

Avista Corp.

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VIA: UTC Web Portal

Date: June 17, 2019

Mark L. Johnson Executive Director and Secretary Washington Utilities & Transportation Commission 1300 S. Evergreen Park Drive S.W. Olympia, Washington 98504-7250

Re: Docket No. UE-190459 – Comments of Avista Utilities

Dear Mr. Johnson,

Avista Corporation, dba Avista Utilities (Avista or Company), submits the following comments in the Matter of Public Utility District No. 1 of Chelan County, Washington's Petition for Declaratory Order Regarding Application of WAC 480-109-200, Docket UE-190459.

Avista appreciates the opportunity to comment on Public Utility District No. 1 of Chelan County's request for the Commission to approve the generation from incremental efficiency gains at the Chelan Hydroelectric Projects as an eligible renewable resource under the Energy Independence Act (EIA).

Avista offers its support for the Commission approving the incremental generation from this project. As Washington moves towards a 100 percent clean energy future, and the EIA reaches its 15 percent goal next year, all of the utilities in the State will need to work together to develop, and promote additional renewable energy resources. Maximizing the use of our hydroelectric resources through traditional and more innovative efficiency improvements will increase in importance as more renewables are added to the regional power system. Having approvals from both the Commission and the Department of Commerce will foster the use of these new resources for the benefit all customers in the State of Washington.

Again, Avista appreciates the opportunity to provide these comments. Please direct any questions regarding these comments to Clint Kalich at (509) 495-4532 or myself at 509-495-4975. Sincerely,

/S/Línda Gervaís

Sr. Manager, Regulatory Policy & Strategy linda.gervais@avistacorp.com 509-495-4975 Avista Utilities