	Metric Title	Metric Calculation	Avista Comments
Goal 1: Resilient, reliable, and customer-focused distribution grid			
Outcome 1: Ensure utility responsiveness to customer outages and restoration times.			
1	Equity in Reliability (SAIDI) for Named Communities and Non-named Communities.	Sum all customer interruption minutes, for interruptions greater than 5 minutes, for one year and divide it by the average annual customer count. Provide this calculation for the service territory as a whole and separately for Named Communities.	SAIDI and SAIFI are not customer-focused metrics. IEEE defines SAIDI and SAIFI to be calculated for an electrical system, not to be calculated geographically or spatially for subsets of an electrical system where a circuit/feeder or multiple circuits/feeders serve that subset of the system, such as for Named Communities. SAIDI and SAIFI are used to form a base understanding of general reliability. Avista is concerned that the metrics as proposed will lose their value when not viewed on a system level, especially since feeders can cross multiple census tracts identified as Named Communities and even state lines, so the metrics would not be completely accurate for Named Communities. For a complete view of each utility's reliability, Avista suggests starting with SAIDI and SAIFI at a system level, excluding MEDs. If there is a desire to view reliability with MEDs included, then that should provided as well. Moving to customer focused reliability metrics, IEEE says CEMI and CELID are the most commonly used customer-focused metrics, which both are included below. Additional metrics of interest that are more customer-focused and can be calculated for Named Communities are CAIDI and CAIFI.
2	Equity in Reliability (SAIFI) for Named Communities and Non-named Communities.	Sum the total number of all customer interruptions, for interruptions greater than 5 minutes, for one year and divide it by the average annual customer count. Provide this calculation for the service territory as a whole and separately for Named Communities.	Same comments as SAIDI.
3	Equity in Reliability: length of power outages	Average and median length (in minutes) of power outages per year, separately calculating Named and Non-named Communities for comparison.	Avista supports this metric as written.
4	Historically Worst Performing Circuits	The 10 worst performing circuits in any given year separately by both frequency and duration. In addition, of the 10 worst performing circuits (separately by frequency and duration), the number of years over the past five years that a circuit has appeared on the list.	Avista supports this metric as written.
Outcome 2: Utilities are prepared for and respond to outages and other impacts caused by cyber-attacks, significant events, wildfires, storms, extreme weather events, and other natural			**Avista Comments**
5	Wildfire Avoidance	Number of utility-caused wildfires, ignitions (that do not result in wildfires but could have), and risk events (event with probability of ignition).	Avista can provide this metric as written but agrees definitions are important for consistency of reporting across
6	Response Time to Natural Gas System Emergencies	Average and median length (in minutes) from customer call to arrival of field technician in response to natural gas system emergencies.	Avista can provide this metric as written. We do not suggest adding input metrics at this time. We are open to discussing
Outcome 3: Resilient infrastructure and service, including distributed energy resources, to enable customers to maintain essential functions during times of potential outages.			**Avista Comments**
7	Equity in Resilience Investments	Percent of proposed resilience projects in Named Communities that are completed every year, compared to a proposed projects list that is approved by the Commission.	Avista supports the feedback provided on this metric, particularly the need to define what is included in resilience projects and how the metrics relate to what has been approved or communicated with or by the Commission. The last piece about the approval or communication with or by the Commission may not be needed for this metric due to the timing delay for when resilience projects may be reviewed or approved (i.e. in a CEIP or GRC).
8	Customers Experiencing Multiple Interruptions (CEMI) for Named and Non-named Communities	Average number of outages for customers experiencing multiple interruptions. Total number of customers that experience more than three sustained interruptions divided by the total number of customers served. Provide this calculation for the service territory as a whole and separately for Named Communities.	Avista can provide this metric as written. If a range of values are considered, we suggest limiting the range to 0-3.

9	Customers Experiencing Long Duration Outages (CELID) for Named and Non-named Communities	Number of customers experiencing more than X hours of interruptions per year/total number of customers served, providing separate calculations for X = 0 through X = 8. Provide this calculation for the service territory as a whole and separately for Named Communities.	Avista can provide this metric as written, however, agrees that X should be defined to what is meaningful to the Commission. Avista does not suggest adding a value for "X days".
Goal 2: Customer Affordability			**Avista Comments**
Outcome 1: Reduce energy burden for customers experiencing high energy burden, especially those in Highly Impacted Communities, Vulnerable Populations, and low-income customers.			
10	Arrearages by Month (reported quarterly)	Arrearages by month, by class, measured by zip code - to include 30+, 60+, and 90+ days arrears for total company, and electric and natural gas stated separately for dual fuel utilities.	For dual fuel customers, it may be possible to report each fuel separately but that is not how it is reported to the Commission currently and it is not how it is presented to customers. Avista suggests providing aggregated arrears in total just as we report it today, which is also how we will provide it in our CEIP. Also, Avista continues to believe providing data by census tract may be a better path forward as it is better aligned with other metrics, such as reliability, and CEIP metrics.
11	Percent of Customers in Arrears with Arrearage Management Plans	Number of residential customers, by zip code, in arrears with arrearage management plans (AMPs)/Total customers in arrears 60+ days.	Customers are eligible to enter an AMP if they are 30+ past due, which is when they begin accumulating arrears. For this reason, 30+ days should be the threshold for this metric. Similar to arrear, Avista suggests moving towards providing this data by census tract.
12	Customer Disconnections and Reconnections	Number and percentage of (1) disconnect notices, (2) residential disconnections for nonpayment, and (3) reconnection, each broken out by month and zip code, for known low-income households, Highly Impacted Communities, and Vulnerable Populations, for total company, and electric and natural gas service stated separately for dual fuel utilities.	For dual fuel customers, Avista cannot break out electric and gas separately. A customer is disconnected for their combined arrears amount and typically their electric service only. Similar to the metrics above, Avista suggests moving towards providing this data by census tract. Also, Named Communities are not identified for gas only service areas so this poses an issue.
13	Average Energy Burden	Annual residential bill/average area median income by zip code for all customers, comparing outcomes in Non-named Communities with Named Communities, with electric and natural gas service stated separately for dual fuel utilities.	Energy burden is based on total energy use so for dual fuel customers we must look at their total bill, rather than calculate this by each fuel. Avista does support calculating the percent of customers with a high energy burden, more than 6% for electric only or dual fuel customers, 3% for natural gas only customers. Measuring excess burden is also important for understanding the energy assistance need for each utility.
Outcome 2: Maximize utilization of cost-effective distributed energy resources and grid-enhancing technologies.			**Avista Comments**
14	Net Benefits of DERs and GETs	Net benefits of distributed energy resources and grid-enhancing technologies, as measured through a Commission approved cost-benefit analysis (e.g., docket 210804).	Avista support the feedback provided for this metric.
15	DER Utilization	Count of MWh and MW provided by each DER programs, and Percentage of MWh and MW provided by each DER program as a total of MW demand.	Avista supports the suggestion of this metric including both the quantity of DERs installed or available and how much of the energy and capacity was utilized each year. Avista does not think the inclusion of the phrase "cost-effective" is necessary or needed for this metric, especially since cost-effectiveness may not be the only reason to deploy DERs.
Outcome 3: Maximize the benefit and efficiency of the energy assistance process so that support can be provided to customers based on the program resources available.			**Avista Comments**
16	Percent of Utility Assistance Funds Dispersed	Utility rate-based assistance funds spent/Annual budget for utility rate-based assistance.	Avista support the feedback provided for this metric.
Outcome 4: Lowest reasonable cost compliance with public policy goals and environmental requirements.			**Avista Comments**
17	Incremental Cost	For electric, as calculated and reported in utility filed CEIP. For natural gas, lowest reasonable cost of compliance with CCA.	Avista supports this metric as originally written and does not agree with the feedback provided.
Outcome 5: Increase awareness of and equitable access to utility services, assistance, education, and benefits for all customers, with a focus on Highly Impacted Communities, Vulnerable			**Avista Comments**

18	Availability of Materials in Multiple Languages	Percentage of utility engagements — including workshops, mailers, and community meetings — offered in multiple languages or with translation services.	First, Avista agrees that this metric needs more definition and scope identifications. If this metric is for all utility activity, it is difficult and may be impossible to accurately track given the nature of our engagements across the Company. With many offices in rural communities and employees whose role is to work in the community, tracking all engagements is not realistic. Avista believes this metric should be focused on broad customer communications, outreach, and engagement with a particular focus on energy assistance, energy efficiency, customer service, safety, and the CEIP. These are the primary customer facings engagements.
19	Customer Awareness of Services/Assistance	Percent of customers in Named Communities stating that they are “somewhat aware of” or “very aware of” utility specific utility services and assistance programs.	
20	Customers Who Participate in One or More Bill Assistance Programs	Unique number of low-income customers who participate in at least one bill assistance program/vetted estimate of total number of low-income customers that qualify for bill assistance.	Avista agrees that the term "vetted" needs to be defined. We believe this metric should remain focus on participation in bill assistance programs.
Goal 3: Advancing equity in utility operations			**Avista Comments**
Outcome 1: Equitable and diversity-focused utility hiring, promotion, and vendor selection practices.			
21	Workplace Diversity	Percentage of employees and senior management (separately identifying: (a) C-suite employees and (b) directors and employees more senior than directors) who identify as: (i) a person of color; and/or (ii) a woman or non-binary.	Avista supports this metric as written.
22	Supplier Diversity	Percentage of suppliers that are owned by people of color, women, and other marginalized groups certified with the Washington State Office of Minority and Women’s Business Enterprises, and total dollars awarded to suppliers owned by people of color, women, and other marginalized groups certified with the Washington State Office of Minority and Women’s Business Enterprises.	Avista supports the feedback provided for this metric.
Outcome 2: Ensure that utility operational and investment decisions promote equitable service that does not unfairly harm or disadvantage Highly Impacted Communities, Vulnerable			**Avista Comments**
23	Annual Incremental Investment Spending	Total amount of capital or operational expenditures that benefit Highly Impacted Communities or Vulnerable Populations in the current year/the amount of capital or operational expenditures that benefit Highly Impacted Communities or Vulnerable Populations in the previous year.	As noted in the feedback for this metric, tracking capital and O&M for certain geographic areas or subsets of customers will be difficult and may be impossible to provide. For example, certain IS/IT expenditures will benefit HIC and VP, but how might one determine the amount simply from computer or Office software deployments. Definition and process to determine how to provide data for this metric will be crucial. Avista is unsure what the question added at the end of the feedback for this metric means.
24	Percentage of Non-pipeline and Non-wires Alternative Spending	Total investment in non-pipeline or non-wires alternative programs targeted in Highly Impacted Communities or on Vulnerable Populations/Total investment in non-pipeline or non-wires alternative programs, separately calculated for duel fuel utilities.	Avista supports this metric as written.
Outcome 3: Equitable access to all utility energy programs, including those related to energy efficiency, demand response, and distributed energy resources.			**Avista Comments**
25	Equity in DER Program Enrollment	Number of customers in Named Communities or low-income customers enrolled in each utility distributed energy resource programs (providing a separate calculation for energy efficiency, electric vehicle, net metering, and demand response)/total customers enrolled in each program.	Avista supports the feedback for this metric to change the language "electric vehicle" to "electric transportation" and the need for definitions for DER programs applicable to electric or gas service. Regarding the comment to include the percent of eligible customers enrolled, Avista does not believe this is necessary as some DER programs may have limited enrollment availability and our understanding of the intent of this metric, is to track the number of customers that participate over time.
26	Equity in DER Program Spending	Separately calculated percentage of utility spending on distributed energy resources for energy efficiency, electric vehicle, net metering, demand response, and renewables that benefits Named Communities as compared to Non-named Communities.	Avista supports the feedback provided for this metric.
Outcome 4: Ensure active and meaningful utility engagement with communities, including Highly Impacted Communities, Vulnerable Populations, and low-income customers such that their input is considered in utility planning processes.			**Avista Comments**

	None selected – Hold for Policy Statement		No comment.
Goal 4: Environmental improvements			**Avista Comments**
Outcome 1: Reduce pollution burden and pollution exposure with a focus on communities with elevated exposures to health hazards, including Highly Impacted Communities, Vulnerable			
27	Energy-related Air Quality Emissions	Annual criteria air pollutant (CO, Pb, NOx, O3, PM10, PM2.5, and SO2) and toxic air pollutant (Hg) emissions associated with utility generation, transmission, and distribution operations (including customer direct use) for the following geographies: • Across the utility's service territory, • By census tract within the utility's service territory, and • In Named vs. Non-named Communities within the utility's service territory.	First Avista stands by its suggestion that this metric should be reworked through discussion with environmental impact experts. Second, Avista can provide SO2, Mercury, NOx, and VOC as we do in our CEIP and have agreed to in our GRC. This data is available for our service territory as a whole and **cannot be provided at any more granular level**, including by census tract or Named vs. Non-Named Communities. Regarding the suggestion to include generation sources outside of Washington, those are included in what Avista already provides and the emissions from those resources is included in the last metric listed below. Further discussion is needed regarding the consideration of reporting benzene from gas use. Note through the CCA, Ecology will begin monitoring air quality in overburdened communities so they may have additional data available in the future.
28	Utility Fleet Tailpipe Emissions Reductions	Utility vehicle fleet tailpipe emissions reductions by vehicle type (light-, medium-, and heavy-duty) that may operate in Named Communities, according to the utility's adoption of low- and zero-emissions vehicles, using the utility's 2022 fleet composition as baseline.	Avista does not agree with the addition of other impacts in this metric beyond fleet tailpipe emissions as they may not be identifiable. We do believe it will be important to report tailpipe emissions for our entire fleet operating in Washington. For reporting of tailpipe emissions in Named Communities, we agree it should be for those vehicles that are based in Named Communities or regularly travel in or through Named Communities. Using 2022 for the baseline is reasonable as normal operations fore utility vehicles occurred in 2022. Avista would be okay with reporting the total emissions per year as well as the reduction compared to the baseline.
Outcome 2: Cost-effective alignment of load with clean energy generation and storage through load management, energy efficiency measures, and demand response.			**Avista Comments**
29	Utility Electric Load Management Success	Energy and capacity of load reduced or shifted, and percent of load reduced or shifted, through load management activities conducted by the utility, by activity (e.g., demand response versus energy efficiency).	Avista agrees with most of the feedback included for this metric, with the exception of highlighting bidirectional charging capabilities. Managed TE loads would already be included as part of demand response programs.
30	DER GHG Reductions	Greenhouse gas reductions from DER programs (energy efficiency, electric vehicle, net metering, and demand response).	Avista supports the feedback provided for this metric such that it should be clarified if the reporting would be for all program in aggregate or by each program type and that the information should be provided incrementally each year based on the activities that occurred each year.
Outcome 3: Accelerate the cost-effective achievement of Commission or state public policy goals and statutes, including the reduction of greenhouse gas emissions.			**Avista Comments**
31	Greenhouse Gas Reductions per Dollar	Greenhouse gas reductions per dollar spent on programs and investments that reduce greenhouse gas emissions.	Avista agrees this metric needs definition of qualifying programs, but disagrees there should be a comparison to a linear glidepath as there may not be a linear glidepath to compare to.

32	Total Greenhouse Gas Emissions	Carbon intensity by CO2e (metric tons of CO2 and CO2-equivalent emissions) and CO2e/customer associated with utility generation, transmission, and distribution operations (including customer direct use), and CO2e/therm for gas utilities and in CO2e/MWh and CO2e/MW for electric utilities (dual-fuel utilities must report both separately).	The suggested edit to call out PPAs and market purchases is not necessary as this metric already includes providing emissions intensity by customer direct use. Also, if leakages for gas utilities are considered as part of this metric, Avista would only be able to report on what happens on its system, not any leaks that occur upstream from a gate station. Additional conversation is likely needed to understand how and where leakages for gas utilities should be considered and reported.
		Total	