

**Avista Corp.**

1411 East Mission P.O. Box 3727  
Spokane, Washington 99220-0500  
Telephone 509-489-0500  
Toll Free 800-727-9170

December 27, 2022

Ms. Amanda Maxwell  
Executive Director and Secretary  
Washington Utilities and Transportation Commission  
621 Woodland Square Loop SE  
Lacey, WA 98503

Received  
Records Management  
12/27/22 11:30  
State Of WASH.  
UTIL. AND TRANSP.  
COMMISSION

**RE: Docket U-210590 - Avista's Responses Related to Performance Metrics – Phase 1**

Dear Ms. Maxwell:

Avista Corporation, dba Avista Utilities (Avista or the Company), submits the following comments in accordance with the Washington Utilities and Transportation Commission's (Commission) Notice of Opportunity to File Written Comments (Notice) issued in Docket U-210590 on November 30, 2022, regarding the development of a "policy statement addressing alternatives to traditional cost of service ratemaking".

For ease of providing Avista's comments on the proposed metrics discussed at the November 7, 2022 workshop, included with these comments is an Excel version of the metrics as proposed for discussion at that meeting with Avista's corresponding comments on each of the metrics proposed (labeled "210590-AVA-PBR Metrics Comments-12-27-22").

If you have any questions regarding this filing, you can contact me at 509-495-8620 or [patrick.ehrbar@avistacorp.com](mailto:patrick.ehrbar@avistacorp.com).

Sincerely,

*/s/ Patrick Ehrbar*

Patrick Ehrbar  
Director of Regulatory Affairs