



Avista Corp.

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

December 3, 2020

Mark L. Johnson
Executive Director and Secretary
Washington Utilities & Transportation Commission
621 Woodland Square Loop SE
Lacey, WA 98503

Re: Docket No. UE-190837 – Comments of Avista Utilities

Dear Mr. Johnson,

Avista Corporation, dba Avista Utilities (Avista or 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 UE-190837 on November 3, 2020 In the Matter of Amending, Adopting, and Repealing WAC 480-107, Relating to Purchases of Electricity (PoE), Docket UE-190837.

Pursuant to the Notice, Avista provides the following comments regarding specific sections of the rules that could benefit from further refinement.

WAC 480-107-007(2) – Regarding the Commission’s review of a Company’s acquisition of resources governed by WAC 480-107, the Company suggest the following revisions for clarification:

(2) When the commission evaluates the prudence of the utility’s acquisition of new resources in rate and other proceedings, it the commission will consider the information the utility obtained through its acquisition solicitation and procurement efforts. when the commission evaluates the performance of the utility in through rate and other proceedings.

WAC 480-107-007 – Regarding the definition of the “Repowering,” the Company suggests the following revisions for clarification:

*“**Repowering**” means a rebuild or refurbishment, including fuel source changes, of a utility-owned generator or generation facility that is required in order to extend the useful*

Received
Records Management
12/10/20 11:16
State Of WASH.
UTIL. AND TRANSP.
COMMISSION

~~life or economic life of the generator or facility, due to the generator or facility reaching the end of its useful life or the useful reasonable economic life. The rebuild or refurbishment does not constitute repowering if it is part of ~~routing~~ routine major maintenance or operations, existing hydroelectric licensing obligations, or replacement of equipment that does not materially affect the physical or economical longevity of the generator or generation facility.~~

WAC 480-107-015(4) – The Company proposes the following language to further clarify when the evaluation process for bids is to begin:

Prior to the expiration of the solicitation period specified in the RFP, the utility may allow the bid contents to be available to its employees and the independent evaluator, within the limitations established in WAC 480-107-024(3). Such availability must be solely for the purpose of tracking the receipt of bids. The evaluation phase will not occur until such time as all bids have been received and the bidding timeframe has officially closed. ~~and to prepare for, but not to begin, the evaluation phase of the RFP process~~

WAC 480-107-023(4) – Regarding the data a utility must provide to an independent evaluation, as drafted the requirement to provide “all data and information” is overly broad and may result in claims that the utility did not provide something, even it is unreasonable. To address this concern the Company suggests the following revision:

The utility must provide the independent evaluator with all data and information reasonably necessary to perform a thorough examination of the bidding process and responsive bids.

Please direct any questions regarding these comments to me at 509-495-2782 or Shawn.Bonfield@avistacorp.com.

Sincerely,

/s/ Shawn Bonfield

Shawn Bonfield
Sr. Manager of Regulatory Policy & Strategy