



Avista Corp.

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October 31, 2017

Steven V. King
Executive Director and Secretary
Washington Utilities & Transportation Commission
1300 S. Evergreen Park Drive S. W.
P.O. Box 47250
Olympia, Washington 98504-7250

Re: Docket No. UE-160071 & UG-160072 – Avista Utilities Q3 2017 Fee-Free Payment Program Report

Dear Mr. King,

On March 24, 2016 the Commission issued Order 01 in Docket UE-160071 and UG-160072 approving Avista Corporation's, dba Avista Utilities (Avista or Company) petition for an order authorizing accounting and ratemaking treatment of its residential fee-free payment program. In its petition, the Company sought to defer the costs associated with offering the fee-free payment for up to 36 months from the time the program went into effect. The fee-free payment program was successfully launched on February 19, 2017.

In its petition, the Company agreed to provide updates to the Commission every three months about the program's progress. For purposes of reporting, the Company will be providing updates that coincide with the quarters of the calendar year.

Avista's residential fee-free payment program encompasses previous methods of payments that were assessed a fee or not available. The program includes the following payment methods and channels:

- Credit and debit card payments made through a Customer Service Representative (CSR), through the Company's Integrated Voice Recognition (IVR) system, through its website as a one-time guest payment, through its website as an authenticated user, and for Automatic Payment Service (APS) payments.
- Automated Clearing House (ACH) payments made through a CSR, through the Company's IVR system, and through its website as a one-time guest payment.

Prior to the launch of the program, customers could pay free of charge by ACH through the Company's website as an authenticated user and for APS payments. Also, prior to the launch of the program APS payments were limited to only ACH payment methods.

The following table represents the residential payment information for the Company's Washington customers by month:

Table No. 1

Payments	January	February	March	April	May	June	July	August	September	October	November	December	Total
Total Payments	211,354	194,987	219,215	197,679	208,013	196,544	200,998	205,075	187,450	-	-	-	1,821,315
Fiserv Payments	-	28,610	99,256	91,667	98,866	90,153	96,994	97,249	90,974	-	-	-	693,769
Fee-Free Fiserv	-	8,147	25,058	23,182	25,473	26,890	30,169	31,210	31,661	-	-	-	201,790
Kubra Fee-Free Equivalent*	18,542	11,493	3	2	1	-	-	-	-	-	-	-	30,041
Total Fee-Free	18,542	19,640	25,061	23,184	25,474	26,890	30,169	31,210	31,661	-	-	-	231,831
Fee-Free Payments as % of Total	8.8%	10.1%	11.4%	11.7%	12.2%	13.7%	15.0%	15.2%	16.9%	-	-	-	12.7%

*Kubra Fee-Free Equivalent – these payments represent the Kubra payments received from February 1st – 18th that would have come through the fee-free payment program. Kubra did not process APS payments, which Fiserv now does, including the ability for customers to sign up for APS by credit or debit card.

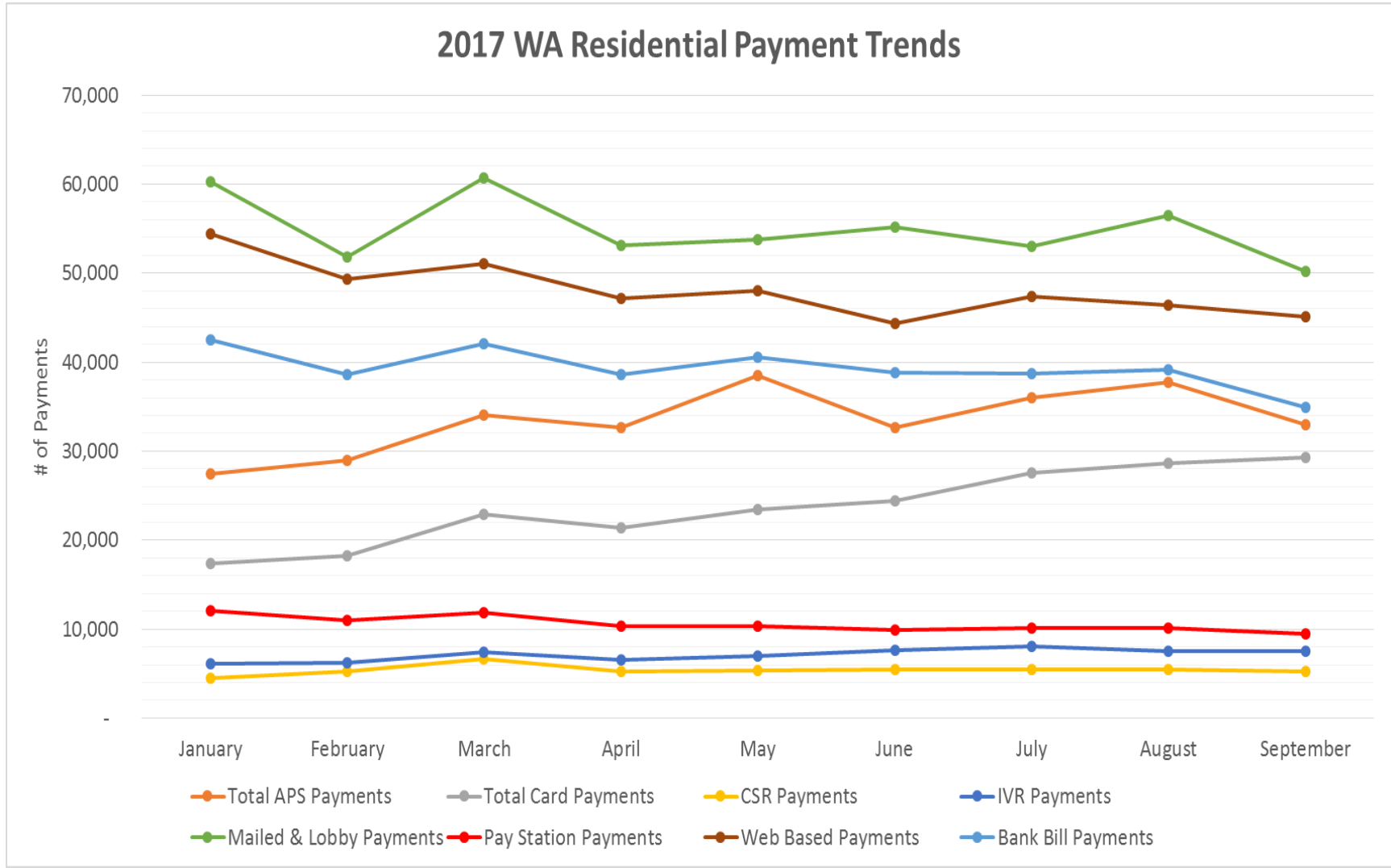
Table No. 2 below includes additional detail on certain payment channels. This information is highlighted to monitor trends in customers’ payment behavior. Note that the data in Table No. 2 will not subtotal to the data in Table No. 1 as there is overlap in payment information by channel (i.e., “Total Card Payments” includes card payments made through APS, CSRs, the IVR, and web).

Table No. 2

Payment Method	January	February	March	April	May	June	July	August	September	October	November	December	Total
APS by ACH	27,456	28,895	33,613	31,742	36,812	30,780	33,448	34,535	29,606	-	-	-	286,887
APS by Debit or Credit Card	-	31	464	939	1,669	1,903	2,610	3,254	3,407	-	-	-	14,277
Total APS Payments	27,456	28,926	34,077	32,681	38,481	32,683	36,058	37,789	33,013	-	-	-	301,164
Total Card Payments	17,364	18,209	22,947	21,339	23,462	24,437	27,557	28,689	29,275	-	-	-	213,279
CSR Payments	4,450	5,204	6,707	5,215	5,328	5,472	5,427	5,430	5,200	-	-	-	48,433
IVR Payments	6,113	6,240	7,364	6,579	6,955	7,609	8,042	7,556	7,518	-	-	-	63,976
Bank Bill Payments	42,536	38,619	42,104	38,586	40,587	38,773	38,682	39,138	34,928	-	-	-	353,953
Mailed & Lobby Payments	60,295	51,786	60,708	53,136	53,757	55,138	52,975	56,434	50,207	-	-	-	494,436
Pay Station Payments	12,119	10,988	11,882	10,390	10,361	9,883	10,171	10,122	9,475	-	-	-	95,391
Web Based Payments	54,456	49,343	51,011	47,122	48,023	44,311	47,388	46,393	45,140	-	-	-	433,187

Chart No. 1 below displays the payment trends from Table No. 2.

Chart No. 1



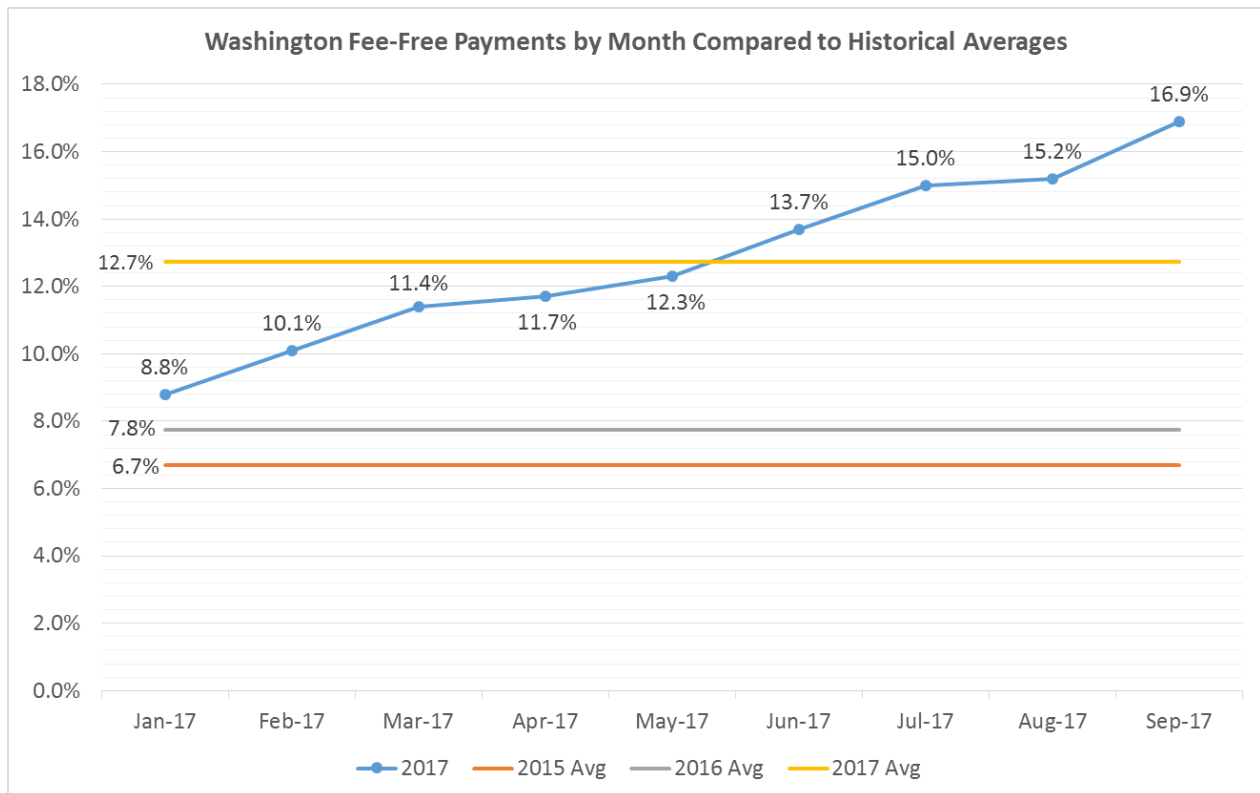
For historical comparison purposes, Table No. 3 displays residential payment data from 2015 and 2016. The column labeled “Payments Subject to Convenience Fee” represents the payments that were previously charged a fee and no longer do through the Company’s fee-free payment program.

Table No. 3

Year	# of Residential Payments	Payments Subject to Convenience Fee	% of Total
2015	2,435,536	163,570	6.72%
2016	2,474,632	191,720	7.75%

Chart No. 2 graphically shows the trend in fee-free payments in 2017 compared to the historical annual average in 2015 and 2016.

Chart No. 2



To date the Company has paid invoices for February through April, of which \$84,903.30 has been deferred for customer transactions through the fee-free payment program. The

Company continues to work through the invoice reconciliation process with Fiserv and expects to begin paying invoices closer to the months when the expenses were incurred soon.

Please direct any questions regarding this report to Shawn Bonfield at 509-495-2782 or shawn.bonfield@avistacorp.com or myself at 509-495-4975 or linda.gervais@avistacorp.com

Sincerely,

Linda Gervais

Sr. Manager Regulatory Policy
Avista Utilities