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June 10, 2022

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Amanda Maxwell
Executive Director and Secretary
Washington Utilities and Transportation Commission
P. O. Box 47250
Olympia, WA 98504-7250

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Re: *In the Matter of Avista Corporation, d/b/a Avista Utilities 2021 Clean Energy
Implementation Plan*, Docket UE-210628
Recessed Open Meeting, June 16, 2022

Dear Director Maxwell:

The Energy Project (TEP) submits these comments for consideration at the Recessed Open Meeting scheduled for June 16, 2022, regarding the Avista Clean Energy Implementation Plan (CEIP) filed October 1, 2021, and the additional agreed conditions (Conditions) filed on May 19, 2022.

As noted in Avista's May 19 filing, TEP has no objection to the proposed Conditions. The Energy Project recommends that the Commission approve the Avista CEIP subject to these Conditions. This letter highlights areas that from TEP's perspective are of particular importance for Avista's low-income customers and vulnerable populations.

The Energy Project is a member of Avista's Energy Assistance and Energy Efficiency Advisory Groups and has been an active participant in the review of Avista's CEIP and the development of the Conditions. As mentioned by Public Counsel in its June 8 letter in this docket, TEP was one of the stakeholders (the "Joint Advocates") involved in the development of a comprehensive set of Customer Benefit Indicators (CBIs) for the utilities to consider in the development of their CEIPs. The Energy Project submitted multiple rounds of comments in this docket and engaged with the Company other stakeholders in the intensive discussions over many weeks that led to agreement on the set of Conditions filed in May.

Because the Avista CEIP will be in place for four years, and because it sets a precedent as the first CEIP presented to the Commission, an important goal for TEP has been to ensure that, to the maximum extent possible, the initial CEIP adopt a strong and detailed framework, rather than postponing specifics for a later day. The Energy Project's focus has been on inclusion of CBIs

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that track the experience of low-income and vulnerable populations. The Energy Project has advocated for CBIs and metrics that provide practical specificity, measuring improvement in defined areas that reflect whether or not customers see direct tangible benefits from the transition to clean energy.

While Avista's as-filed CEIP contained several reasonable CBIs, TEP identified some areas of potential improvement, in particular regarding affordability and energy security. To address this concern, working through the Conditions process, the Company and parties agreed to include Condition 22 which establishes a CBI for "Residential Arrearages and Disconnections For Non-payment" with related tracking and reporting metrics. The Energy Project strongly supports inclusion of this Condition.

The Conditions also adopt several other elements important to TEP, including:

- Express commitments in multiple Conditions to include Avista's advisory groups, including the Energy Assistance and Energy Efficiency Advisory Groups, in key CEIP activities going forward.
- Throughout the Conditions, as appropriate data will be tracked not just for residential customers, but also for known low-income, vulnerable populations and highly impacted communities.
- Recognition of the need for an update and expansion of the Vulnerable Populations areas, with consultation from advisory groups, as well as the need for additional data sources and mapping. (Condition 9)
- As part of the CBI for Customer Participation in Company Programs, Avista will track residential appliance and equipment rebates, including for customers residing in rental units. (Condition 17)
- Inclusion of a CBI to track households with a high energy burden, with separate tracking for known low-income (KLI) customers and those in Named Communities. (Condition 18)
- Tracking increased availability of translation services. (Condition 19)
- Adoption of metric for decreased wood use for heating, as part of the Outdoor Air Quality CBI. (Condition 20)

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- Inclusion of a metric to measure frequency of power outages, including for known low-income, vulnerable populations and highly impacted communities. (Condition 21)
Outage duration will also be measured.
- A commitment to develop a metric for indoor air quality. (Condition 24)
- Measurement of distributed energy and storage resources in Named Communities, including the number (i.e., sites, projects, and/or households) of distributed renewable generation and storage resources.

The Energy Project is also pleased that the Conditions recognize the on-going nature of the CEIP process by committing Avista to work with its advisory groups to consider additional CBIs proposed by the Joint Advocates and other stakeholders and to propose an updated list of CBIs and metrics in the 2023 Biennial CEIP update. (Condition 23) Importantly, the Conditions also specify that future CEIPs and updates will organize CBIs around statutory benefit areas (Condition 25).

Thank you for considering these comments. The Energy Project will be in attendance and available to answer questions at the Recessed Open Meeting on June 16.

Sincerely,

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SJf:cjb

cc: Avista Utilities
Commission Staff

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