



ATTORNEY GENERAL OF WASHINGTON

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January 25, 2019

SENT VIA WUTC WEB PORTAL

Mark L. Johnson
Executive Director and Secretary
Washington Utilities and Transportation Commission
1300 S. Evergreen Park Dr. SW
P. O. Box 47250
Olympia, Washington 98504-7250

Re: Petition of Avista Corporation For an Order Authorizing Approval of Changes to the Company's Natural Gas Line Extension Tariff and Associated Accounting and Ratemaking Treatment
Docket UG-180920

Dear Mr. Johnson:

On January 14, 2019, Avista Corporation (Avista) filed a Second Revised Petition to withdraw its request to extend the existing Line Extension Allowance Program (LEAP) Pilot, but still maintain its request to make the Perpetual Net Present Value (PNPV) calculation methodology permanent. The Public Counsel Unit of the Washington State Attorney General's Office (Public Counsel) respectfully submits these comments in response to Avista's Second Revised Petition.

As expressed in our previous comments filed on December 7, 2018, Public Counsel supported the continuation of the LEAP program. While we agree with Avista that the LEAP has been valuable to Avista's customers, Public Counsel is open to working with Avista and other stakeholders in the Energy Assistance Advisory Group on Avista's line extension program. Public Counsel looks forward to discussing options with stakeholders to develop a line extension allowance program that would focus on providing benefits to Avista's lower income population.

Additionally, Public Counsel continues to support the continued use of the PNPV methodology to determine the amount of a line extension allowance.

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To: Mark L. Johnson, Executive Secretary
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Date: January 25, 2019
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If you have any questions about these comments, please contact me at (206) 389-3879 or via e-mail at SarahL2@atg.wa.gov.

Sincerely,

/s/ Sarah Laycock

SARAH E. LAYCOCK
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