



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

May 7, 2021

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

Re: **Docket No. UE-210247** – Notice of Opportunity to Respond to Petition (City of Spokane
Petition for Declaratory Order)

Dear Mr. Johnson,

Avista Corporation, dba Avista Utilities (Avista or the Company), submits the following comments in accordance with the Notice of Opportunity to Respond in the Matter of the Petition of City of Spokane for an Order Declaring that the City of Spokane Waste to Energy Facility is not “Baseload Electric Generation” Under RCW 80.80.010(4) and WAC 480-100-405(2)(a).

In its Notice dated April 20, 2021, the Commission gave notice that Interested Parties could provide feedback on the City’s Petition. Avista, for its part, does not take a position as to whether the Waste to Energy Facility is or is not baseload electric generation. That legal finding is left to the Commission. That said, should the Commission decide to rule on the issue and find in favor of the City’s position, we would engage with the City in negotiations on a long-term PPA. The Waste to Energy Facility has been an important resource for serving our customers, including the City of Spokane.

Please direct any questions regarding these comments to Patrick Ehrbar at 509-495-8620 or patrick.ehrbar@avistacorp.com.

Sincerely,

/s/ Jason R. Thackston

Jason R. Thackston
Senior Vice President of Energy Resources