



Avista Corp.

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July 30, 2020

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

Dear Mr. Johnson,

Attached for filing with the Commission is an electronic copy of Avista Corporation's, dba Avista Utilities ("Avista" or "the Company"), proposed modifications to tariff Schedule 80 "Meter Reading and Billing Practices." The proposed additions are included in the following tariff sheet, WN U-28:

Third Revision Sheet 80a Canceling Second Revision Sheet 80a

On April 13, 2020, by operation of law, the Commission allowed modifications to tariff Schedule 80 to go into effect regarding the Company's advanced metering infrastructure (AMI) opt-out policy. Specifically, the filing updated the monthly recurring charge (from \$5 to \$10) for manual meter reading services for customers that opt out of conversion to a communicating AMI meter. The filing also updated the Company's policy to allow opt-out customers to retain their old, analog meter rather than receive a new, non-communicating digital meter.

As the Company nears the end of its AMI installations, it has identified a need to further modify its tariff Schedule 80 related to our opt-out policy. A group of just over 100 customers are refusing to sign the standard Application Form to receive a non-communicating digital meter as required by tariff Schedule 80 and are refusing to allow the Company to install a communicating digital meter. As stated in tariff Schedule 80, "the Company shall not initiate the process to provide non-communicating meter service before it has received the Customer's signed, written request in the Application Form on file with the Commission." A customers' refusal poses two issues the Company must now address:

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1. Beginning October 1, 2020, customers that have chosen to opt-out of receiving a communicating meter by returning a signed Application Form will begin being charged the monthly fee of \$10, which covers the cost of the Company to manually read their meter. For customer's that refuse to sign and return an Application Form or accept a communicating meter, they will receive unequal treatment of the terms and conditions approved in tariff Schedule 80.
2. For customer's that refuse to sign and return an Application Form or accept a communicating meter, they will be in violation of the Company's tariff Schedule 70 if they deny the Company access to its equipment. Tariff Schedule 70, provision #8 – Access to Premises, states the following:

The customer shall grant all necessary permission to enable the Company to install and maintain the service on the premises of the Customer and to carry out its contract. The Company shall have the right through its agents, or other employees, to enter upon the premises of the Customer at all reasonable times for the purpose of installing, reading, inspecting, repairing, or removing the metering devices, facilities, and wiring of the Company. In the event the Customer is not the owner of the premises occupied, the Customer shall obtain such permission from the owner as the Company may require.

Many of the customers identified have not only threatened to deny access to the Company to install a communicating meter but have made threats to Avista's employees if they do access their property. Avista takes all threats made against employees serious and places the safety of its employees above all else.

The Company has evaluated multiple options to deal with the issues described above. First, the Company could deny these customers the ability to opt-out of receiving a communicating meter on the grounds that they refuse to sign and return an Application Form and are preventing safe access for the Company's personnel and standard equipment. As a result, the Company would then plan to install a communicating meter, which the customers have stated they will refuse to allow access for the Company to do so. The second option is for the Company to disconnect these customers from service as a condition of receiving service from the Company is to allow safe access to the Company.

Neither of these options are favorable for the customer, Company, nor the Commission, and likely will lead to additional issues or unintended consequences. Further, the Company plans to take all possible steps to avoid disconnecting any customer. To date the Company has taken the

following actions to get the group of customers discussed above to either sign an opt-out Application Form or accept the installation of a communicating meter:

1. Three AMI mailed notifications, 90, 60, and 30-days, prior to the installation of the AMI meter;
2. Truck roll to install smart meter;
3. If customer refuses smart meter installation, customer is contacted by phone regarding opt-out process;
4. Opt-out Application Form sent to customer;
5. Reminder letter mailed to customer 15-days after Application Form sent;
6. If opt-out Application Form is not received within 30-days, second truck roll is initiated to install smart meter;
7. If customer refuses smart meter installation on second installation attempt, opt-out notification process begins again. Customer is contacted by phone regarding opt-out process;
8. Opt-out Application Form sent to customer;
9. Reminder letter mailed to customer 15-days after Application Form sent;
10. If opt-out Application Form is not received within 30-days, meter shop attempts to contact customer to initiate installation of smart meter, including a potential third truck roll; and,
11. Up to two more additional attempts to contact customer to initiate installation of smart meter (potential fourth and fifth truck roll).

Rather than pursuing the options above, the Company proposes to modify its tariff Schedule 80 as follows:

*The Company shall not initiate the process to provide non-communicating meter service before it has received the Customer's signed, written request in the Application Form on file with the Commission. **If by October 1, 2020, a customer refuses to sign Avista's standard Application Form on file with the Commission to receive a non-communicating meter and refuses to allow the Company to install a communicating meter, the customer will be deemed to have opted-out of receiving a communicating meter and will be subject to the opt-out terms and conditions described in provisions number 2 through 6 of tariff Schedule 80a.***

The Company will continue to require customers that would like to opt-out to sign an Application Form. However, the proposed tariff revision will mean all customers that opt-out of a communicating meter are subject to the same terms and conditions and manual meter reading fees, regardless if they sign the Application Form or refuse to sign.

The proposed tariff revision will not solve both of the issues discussed above. Those customers that refuse to provide access to the Company must be also be addressed. Per the terms and conditions of Schedule 80, the Company may refuse or revoke the installation of a non-communicating meter at the Customer's premises when safe access is not available for the Company's personnel and standard equipment. Customers that have made threats to employees and refused access to the Company's personnel will have the option of accepting a communicating meter or not taking service from the Company. If a customer with a non-communicating meter refuses access to the Company in the future when the Company requires access to read the meter or replace it if it fails, the Customer will be subject to the terms and conditions set forth in tariff Schedules 70 and 80, and WAC 480-100-168 and 480-100-128, which includes termination of service.

Avista is providing notice of the proposed tariff changed discussed in this filing to those customers affected by the change. The customer notice is attached to this filing as Attachment A. The Company requests that the Commission allow the proposed tariff changes discussed herein with an effective date of September 1, 2020 to go into effect by operation of law. This timeline will give customers 30-days to respond to the proposed change if approved.

Please direct any questions regarding this filing to me at 509-495-2782 or shawn.bonfield@avistacorp.com.

Sincerely,

/s/ Shawn Bonfield

Sr. Manager Regulatory Policy and Strategy
Avista Utilities