



Avista Corp.

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September 22, 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"), filing of its proposed revisions to the following tariff sheets, WN U-29:

- | | | |
|------------------------------------|-----------|---|
| First Revision Sheet 170-A | Canceling | Original Sheet 170-A |
| Second Revision Sheet 170-B | Canceling | Substitute First Revision Sheet 170-B |
| First Revision Sheet 170-C | Canceling | Original Sheet 170-C |
| Second Revision Sheet 170-D | Canceling | Substitute First Revision Sheet 170-D |
| Second Revision Sheet 170-E | Canceling | Substitute First Revision Sheet 170-E |
| Third Revision Sheet 170-F | Canceling | Second Revision Sheet 170-F |
| Fourth Revision Sheet 170-G | Canceling | Third Revision Sheet 170-G |
| Second Revision Sheet 170-H | Canceling | Substitute First Revision Sheet 170-H |
| Second Revision Sheet 170-I | Canceling | Substitute First Revision Sheet 170-I |
| Third Revision Sheet 170-J | Canceling | Substitute Second Revision Sheet 170-J |
| Second Revision Sheet 170-K | Canceling | Substitute First Revision Sheet 170-K |
| Third Revision Sheet 170-L | Canceling | Substitute Second Revision Sheet 170-L |
| Original Sheet 170-M | | |
| Original Sheet 170-N | | |
| Original Sheet 170-O | | |
| Original Sheet 170-P | | |
| Original Sheet 170-Q | | |
| Original Sheet 170-R | | |
| Original Sheet 170-S | | |
| Original Sheet 170-T | | |
| Original Sheet 170-U | | |
| Original Sheet 170-V | | |

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The Company also proposes to cancel the following tariff sheets, WN U-29, in their entirety, as the modifications made herein have eliminated the numbering structure used on these former revisions, instead replacing the tariff sheets with a letter-only format as described below:

Canceling	First Revision Sheet 170-D.1
Canceling	Substitute First Revision Sheet 170-F.1
Canceling	Substitute Second Revision Sheet 170-F.2
Canceling	Substitute First Revision Sheet 170-H.1
Canceling	Substitute First Revision Sheet 170-I.1
Canceling	Substitute First Revision Sheet 170-J.1
Canceling	Substitute First Revision Sheet 170-K.1
Canceling	Substitute Second Revision Sheet 170-L.1
Canceling	Substitute Second Revision Sheet 170-L.2
Canceling	Substitute First Revision Sheet 170-L.3
Canceling	Substitute First Revision Sheet 170-L.4
Canceling	Substitute First Revision Sheet 170-L.5
Canceling	Substitute Second Revision Sheet 170-L.6
Canceling	Substitute First Revision Sheet 170-L.7
Canceling	Substitute Second Revision Sheet 170-L.8
Canceling	Substitute Second Revision Sheet 170-L.9
Canceling	Substitute First Revision Sheet 170-L.10
Canceling	Original Sheet 170-L.11

I. INTRODUCTION

The primary purpose of this filing is to incorporate the amendments made to WAC 480-90 via General Order R-600 in Docket No. U-180525, the rulemaking “Relating to Consumer Protection in Response to Investor-owned Utility Deployment of Advanced Metering Infrastructure (AMI)”. While integrating the newly-adopted rules, Avista found it most beneficial to simultaneously complete a comprehensive update of its Schedule 170, Rules and Regulations, to remedy several issues with overall verbiage and organization of its tariff sheets, as well as update outdated provisions related to meter testing procedures and other Company business processes.

II. PROPOSED MODIFICATIONS

Organizational Changes

Avista’s Schedule 170 contains a comprehensive set of the Company’s rules and regulations pertinent to its natural gas service as provided to its Washington customers. While various incorporations and tariff revisions have been made to the tariff sheets contained in Schedule 170 over

the years, some sheets have remained without such modifications for over 20 years, thus producing a tariff set that is, in some areas, not as cohesive as the Company would prefer, and thereby potentially confusing for an objective reader. As such, an overall reorganization of the tariff has been completed to allow for more consistency in the subject matters being presented and provide an appropriate flow of information. For example, the “Definitions” listed in this tariff have been moved to the beginning of the tariff, with subsequent sections and headers restructured for efficiency and ease of reference by the reader. The Company has also inserted a “Miscellaneous Charges” section, rather than having various charges and fees placed sporadically within the tariff.

Lastly, Avista re-formatted its overall tariff sheet labeling structure to align with the Company’s other tariff schedules, which follow an alphabetical arrangement that does not contain numerical subsets such as sheet “F.1” or “F.2”. As such, all tariff sheets containing these numerical subsets were removed and replaced with letter-only sheet names.

Incorporation of WAC 480-90 Amendments

The primary intention of the proposed Schedule 170 revisions is to integrate applicable changes in language or process instituted by the recently-adopted revisions to WAC 480-90. Such revisions include providing a definition for “Applicant” in tariff, updating disconnection notification requirements, incorporating information regarding procedures or fees related to disconnection or reconnection of natural gas service, adding verbiage pertinent to customers with medical conditions or emergencies, and establishing in tariff the conditions under which the Company will cease non-voluntary service disconnections during inclement weather events. References and specific language for this tariff has been taken directly from, or aligned in accordance with, WAC 480-90-023, WAC 480-90-128, and WAC 480-90-133.

Changes in Company Procedure

In completing such an all-inclusive array of edits, Avista discovered a few policies included in the tariff that needed material updates. One such change is the elimination of the Company’s separate “Reestablishment Charge” in instances where natural gas service has been discontinued at the Customer’s request and then reestablished within a twelve-month period. Under the current tariff, the customer is required to pay a \$32 fee for reestablishment of such services during regular business hours and \$46 for after-hours reconnection, as opposed to the lower reconnection fees charged for disconnections/reconnections that are not “seasonal” in nature (\$16 and \$32, respectively). Instead,

the Company is proposing that the Customer be required to pay the monthly minimum charges that would have been billed had service not been discontinued, and that the reestablishment charge be aligned with those listed for a typical reconnection. This change is consistent with Avista's business practices across the remainder of the customers it serves in Idaho and Oregon, as Washington natural gas customers are currently the only customers exempt from this back-billing requirement. Having all customers responsible for the minimum charge at their premise helps the Company recover at least a portion of the fixed costs required to keep the natural gas service available to that customer during those months in which the service was not utilized. While such requests for "seasonal" disconnection/reconnection are not common,¹ Avista finds that alignment and consistency across its jurisdictions wherever possible to be administratively efficient when communicating with its customers.

In this filing, the Company also proposes to eliminate its "field visit" fee, previously charged in instances where the Company dispatches an employee for purposes of disconnection, yet no disconnection occurs due to customer payment at the door or other such arrangements. While the labor costs of dispatching such personnel still exist, the Company finds such a fee to be misaligned with intentions of accepting payment at the door and believes that elimination of this fee is in the best interest of the customers it serves.

Meter Test Procedures

Avista's current "Meter Testing Procedures" as detailed in its Schedule 170 are thorough and exhaustive of all possible testing procedures for each natural gas meter type. As part of the update to this tariff, and to mitigate future outdating of Avista's "Meter Test Procedures" as written in tariff, this section has been modified to remove obsolete references and provide a more broad description of the Company's processes while still maintaining compliance with WAC 480-90-343. For example, rather than list specific tolerances for each meter type, the Company instead provides a general description and refers to its Avista Utilities Gas Standards Manual for further specifications. To accommodate this reference, the Company has also included a provision to "provide electronic copies of the Avista Utilities Gas Standards Manual and Standard Operating Procedure for the Gas Meter Measurement Performance Program to the Commission upon request or whenever substantive changes are made." This provision is also in alignment with the Company's Idaho Meter Testing Procedures.

¹ In 2019, Avista received seven customer requests for natural gas service to be disconnected and subsequently reconnected within a 12-month period.

Additionally, the Company has included in these modifications a new \$125 fee applicable to instances where a customer requests a second meter test within a 12-month period, in accordance with WAC 480-90-183(3). This amount is based off the actual costs of providing such a test,² and is in alignment with, if not well below, the comparable fees set by its fellow utilities. The particular scenario of a second annual customer-requested meter test is rare; there have been only two such requests from Avista's Washington electric and natural gas customers within the past three years. However, as the Company aims to unite its tariffs across the jurisdictions it serves, having such fees stated in tariff seems appropriate, is parallel with Avista's Idaho and Oregon tariffs (which utilize actual costs of the meter testing rather than a set fee), and is in alignment with other regulated utilities in Washington.

III. CONCLUSION

Avista appreciates the hard work and support of all parties involved in the Docket No. U-180525 rulemaking. The amendments made to WAC 480-90 through this process, and incorporated into the Company's tariffs herein, will remain an integral part of Avista's continuous ambition to keep its Customers as the central-focus of all we do. As such, the Company respectfully requests that these tariff modifications become effective for service on November 1, 2020. Due to the comprehensive nature and sheer number of modifications made to tariff Schedule 170, the Company has provided the complete tariff in legislative format, included as Attachment A to the filing, in addition to the clean proposed tariff set, for clarity and ease of review by the Commission and its Staff.

If you have any questions regarding this filing, please contact Jaime Majure at (509) 495-7839 or jaime.majure@avistacorp.com.

Sincerely,

/s/ Shawn Bonfield

Shawn Bonfield
Sr. Manager of Regulatory Policy & Strategy

² In contrast to electric meters, which can be tested on-site, natural gas meters may be required to be taken off-site, or even sent to a third-party testing facility, depending on the type of meter being tested. As such, the Company has aligned its meter testing fee to account for the approximate 1 ½ hour required for a serviceman to complete a meter test, which includes drive time to and from a customer's premise. The estimated labor cost, vehicle cost, and tools cost to complete a meter test equates to approximately \$140. The Company has proposed a cost for second meter test in the amount of \$125, rather than the average of approximately \$140 or the full cost, as a conservative approximation for what the test costs. A flat fee is preferred to the actual costs as it is easier to communicate to customers before they confirm a request for the meter test.

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