



UE-220841

Avista Corp.

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

November 15, 2022

Amanda Maxwell
Executive Director and Secretary
Washington Utilities & Transportation Commission
621 Woodland Square Loop SE
Lacey, WA 98503

Received
Records Management
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State Of WASH.
UTIL. AND TRANSP.
COMMISSION

Re: Avista Utilities Tariff WN U-28 Revisions, Schedule 90 – Electric Efficiency Programs

Dear Ms. Maxwell:

Attached for electronic filing with the Washington Utilities and Transportation Commission (Commission) are the proposed tariff revisions of Avista Corporation, dba Avista Utilities (Avista or the Company), requesting modifications to the following electric tariff sheets, WN U-28:

Fifth Revision Sheet 90	Canceling	Fourth Revision Sheet 90
Tenth Revision Sheet 90A	Canceling	Ninth Revision Sheet 90A
Fourth Revision Sheet 90C	Canceling	Third Revision Sheet 90C

The purpose of these requested tariff revisions is to update existing verbiage to adequately reflect various energy efficiency program modifications for the 2023 program year onward, as well as to add clarification and make housekeeping changes to the remaining tariff language. These requested changes are summarized as follows:

- Addition of Demand Response Language – Current Schedule 90 language implies that only a large single customer is eligible for demand response incentives, so updates were made to make the language more generally applicable.
- Changes in Measure Funding – Current language provides that Avista will pay an incentive up to a maximum of a measure’s incremental cost. This has been updated

to state that the Company will fund up to the measure's installed cost, and notes that projects must still meet cost-effectiveness requirements.

- Additional Technical Assistance – Training, workforce development and grant writing assistance were added to the forms of technical assistance that may be provided to customers by, or under the direction of, Avista staff. Language was also broadened to allow for such assistance to be provided to improve energy efficiency services.
- Housekeeping – Several changes were made to Schedule 90 that are housekeeping in nature, to remove provisions that have expired or are no longer relevant and to provide overall clarification within the tariff.

The intent of these changes and additions are to further invest in the communities that Avista serves and to address barriers that exist when considering energy efficiency projects. Expanding the assistance that the Company provides to customers contributes to the community being better positioned to take advantage of energy efficiency opportunities offered through State, Federal and Utility-level programs. Avista finds that this is one of several steps that can be taken to empower customers that have historically been resource constrained.

Descriptions of these changes were presented to the Energy Efficiency Advisory Group (EEAG or Advisory Group) on October 12, 2022, with the actual modifications to the verbiage provided on October 14, 2022; no objections were noted from EEAG members regarding the tariff changes. The Company and its Advisory Group continue to agree that though the tariff allows for considerable flexibility in how programs are designed and delivered, there remains the occasional need for modifications to help meet current and future market conditions and opportunities. This continuous improvement and cost-effective adaptive management of energy efficiency programs will allow Avista to continue to best serve its customers with efficiency services and to maximize energy savings within its portfolio.

This filing is being made concurrently with the Company's 2023 Annual Conservation Plan (ACP), which includes these proposed tariff revisions within Appendix C. Avista respectfully requests that these proposed tariff revisions become effective January 1, 2023.

If you have any questions regarding this information, please contact Ryan Finesilver, Planning and Implementation Manager, Energy Efficiency, at (509) 495-4973.

Sincerely,

/s/ Shawn Bonfield

Shawn Bonfield
Sr. Manager Regulatory Policy & Strategy

Cc: Avista Energy Efficiency Advisory Group