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Kathy Hunter
Acting Executive Director and Secretary
Washington Utilities & Transportation Commission
621 Woodland Square Loop SE
Lacey, WA 98503

RE: Avista Utilities Tariff WN U-28, Schedule 70, Rules and Regulations

Dear Ms. Hunter:

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:

Third Revision Sheet 70-N Canceling 2nd Substitute Second Revision Sheet 70-N

I. INTRODUCTION

The primary purpose of this filing is to modify Avista's electric tariff Schedule 70, "Rules and Regulations", to adjust its inclement weather threshold from 25-degrees Fahrenheit to 32-degrees Fahrenheit. The Company also proposes to include an Air Quality Index (AQI) threshold of 100 and above. This threshold determines whether non-voluntary service disconnections will occur during inclement weather as further defined below.

On June 1, 2023, Avista filed proposed revisions to schedule 70 to incorporate changes from RCW 80.28.010 as a result of House Bill 1329, which provides additional non-voluntary disconnect protections to electric customers during heat related events, as well as the inclusion of

housekeeping items to incorporate information regarding standard voltage and permissible variation pursuant to WAC 480-100-373.¹

Avista met with Staff in late June 2023 to discuss the inclusion of updated low temperature thresholds within the June filing. In order to promptly update disconnection procedures prior to any significant heat events, Avista and Staff agreed to review Avista's low temperature threshold and for Avista to submit revisions prior to any potential inclement weather events (before October 1, 2023) to become effective no later than November 1, 2023.

II. PROPOSED TARIFF MODIFICATIONS

Low Temperature Threshold

Avista's Schedule 70 contains a comprehensive set of the Company's rules and regulations pertinent to its electric service as provided to its Washington customers. The primary intention of the proposed Schedule 70 revisions is to modify the Company's current inclement weather threshold from 25-degrees Fahrenheit to 32-degrees Fahrenheit. As noted above, Avista committed to working with Staff on a proposal to update the Company's threshold and for the updated threshold to be in place prior to this upcoming winter. After discussion with Staff and reviewing the temperature thresholds of peer utilities in Washington, Avista believes that a threshold of 32-degrees Fahrenheit balances the health and safety concerns of disconnecting customers during extremely cold weather, while recognizing that Avista's service territory is much colder than its peer utilities, hence the reason Avista's current threshold was lower than its peers. In addition, with the installation of Advanced Metering Infrastructure (AMI), most disconnections for nonpayment occur on an electric meter, no later than 12:00 p.m., allowing customers to call for reconnection the same day where they are reconnected nearly immediately. Also, it is important to note that currently customers are not assessed deposits or reconnect fees, so can be reconnected simply by calling and requesting to do so. Lastly, Commission Staff supported Avista's proposal to increase its threshold to 32-degrees.

Air Quality Index

¹ Docket UE-230423.

Daily analyses of the air quality throughout Avista’s Oregon service territory is performed utilizing AirNow.gov data. As a health and safety precaution for employees and customers, nonvoluntary service disconnections are not performed when the AQI is at or above 100. An AQI of 100 or above was selected because when air quality levels reach 101, healthy impacts may be experienced by members of sensitive groups. The table below represents the various air quality levels and the potential impact they may have on the community.

Table 1: Air Quality Index Basics for Ozone and Particle Pollution²

Levels of Concern	Values of Index	Description of Air Quality
Good	0 to 50	Air quality is satisfactory, and air pollution poses little or no risk
Moderate	51 to 100	Air quality is acceptable. However, there may a risk for some people, particularly those who are unusually sensitive to air pollution.
Unhealthy for Sensitive Groups	101 to 150	Members of sensitive groups may experience health effects. The general public is less likely to be affected.
Unhealthy	151-200	Some members of the general public may experience health effects; members of sensitive groups may experience more serious health effects.
Very Unhealthy	201-300	Health alert: The risk of health effects is increased for everyone.
Hazardous	301 and Higher	Health warning of emergency conditions: everyone is more likely to be affected.

The addition of an AQI threshold has been a beneficial provision throughout Avista’s Oregon service territory. After discussing with Staff, where they indicated support for establishing an AQI threshold, Avista proposes to include the same AQI threshold it utilizes in Oregon throughout its Washington service territory.

III. CONCLUSION

As outlined in the attached Schedule 70 modifications, Avista hereby requests that the tariff changes proposed become effective November 1, 2023, so that the Company may promptly update

² Please reference the air quality index table on the AirNow.gov website: <https://www.airnow.gov/aqi/aqi-basics/>

its disconnection process to include the updated 32-degree Fahrenheit threshold prior to the start of inclement weather as well as the AQI threshold of 100 or above, ahead of the following years' fire season. If the proposed modifications are approved, Avista will utilize its current daily process for reviewing AQI through AirNow.gov and weather conditions through the National Weather Service when determining which service areas in Washington are subject to inclement weather and AQI conditions (as outlined above). The Company will include an AQI of 100 or above, temperatures of 32-degrees Fahrenheit and below, in addition to its existing heat related alerts as part of its daily review for each county in which the Company has a construction office located.

If you have any questions regarding this filing, please contact me at (509) 495-2782 or shawn.bonfield@avistacorp.com.

Sincerely,

/s/ Shawn Bonfield

Shawn Bonfield
Sr. Manager of Regulatory Policy & Strategy