

**Avista Corp.**

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October 23, 2023

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

Dear Ms. Hunter,

Avista Corporation, dba Avista Utilities (Avista or Company), submits the following tariff revisions to its Schedule 62 “Small Power Production and Cogeneration Schedule”, WN U-28 – Electric Service:

Fifth Revision Sheet 62A	Canceling	Fourth Revision Sheet 62A
Fourth Revision Sheet 62B	Canceling	Third Revision Sheet 62B
Second Revision Sheet 62C	Canceling	First Revision Sheet 62C
Fourth Revision Sheet 62D	Canceling	Third Revision Sheet 62D
Fourth Revision Sheet 62E	Canceling	Third Revision Sheet 62E
Second Revision Sheet 62F	Canceling	First Revision Sheet 62F
Second Revision Sheet 62G	Canceling	First Revision Sheet 62G
Second Revision Sheet 62H	Canceling	Third Revision Sheet 62H
Second Revision Sheet 62J	Canceling	First Revision Sheet 62J

WAC 480-106-040(1) requires that “A utility must file by November 1st of each year, as a revision to its tariff described in WAC 480-106-030 Tariff for purchases from qualifying facilities, a schedule of estimated avoided costs that identifies, both separately and combined, its avoided cost of energy and its avoided cost of capacity.” The purpose of this filing is to update the Company’s avoided costs as described.

On July 25, 2023, the Commission issued a Notice of Change to the Electric Integrated Resource Plan Process (Notice) stating, “As part of the Commission’s effort to reduce unnecessary administrative burden and duplicative processes, we are discontinuing our practice of issuing acknowledgment letters for electric IRPs in all cases.” Regarding the identification of capacity costs, WAC 480-106-040(1)(b) requires a utility to “identify the projected fixed cost of its next planned capacity addition based on either the estimates included in its most recently acknowledged integrated resource plan or the most recent project proposals received pursuant to an RFP consistent with Chapter 480-107 WAC, whichever is most current.” Because of the Commission’s decision to not acknowledge electric IRPs as described in the Notice, the Company requests a five-year waiver from the requirement in WAC 480-106-040(1)(b) as suggested by Commission Staff in discussion ahead of this filing, in hopes that a rulemaking will be completed within this timeframe to eliminate this requirement and need for annual waiver requests. For purposes of the capacity costs included in this filing, the costs are based on the combination of the Company’s 2023 Electric Integrated Resource Plan and 2022 All-Source Request for Proposals.<sup>1</sup>

Workpapers supporting this filing are CONFIDENTIAL and should be treated as CONFIDENTIAL per WAC 480-07-160.

Avista requests the tariff revisions described herein become effective January 1, 2024. If you have any questions regarding this filing, please contact Clint Kalich at 509-495-4532 or [clint.kalich@avistacorp.com](mailto:clint.kalich@avistacorp.com) or myself at 509-495-2782 or [shawn.bonfield@avistacorp.com](mailto:shawn.bonfield@avistacorp.com).

Sincerely,

*/s/ Shawn Bonfield*

Shawn Bonfield  
Sr. Manager Regulatory Policy & Strategy

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<sup>1</sup> Avista’s 2022 Draft All-Source RFP was approved by way of Order 02 issued in Docket UE-210832 on February 10, 2022.