



UG-230887

Avista Corp.

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November 1, 2023

Received
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Nov 1, 2023

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-29 Revisions, Schedule 190 – Natural Gas Efficiency Programs

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 natural gas tariff sheets, WN U-29:

Third Revision Sheet 190	Canceling	Second Revision Sheet 190
Eighth Revision Sheet 190A	Canceling	Seventh Revision Sheet 190A
Fifth Revision Sheet 190B	Canceling	Fourth Revision Sheet 190B

The purpose of these requested tariff revisions is to update existing verbiage to adequately reflect various energy efficiency program modifications for the 2024 program year onward, as well as to add clarification and make housekeeping changes to the remaining tariff language. More specifically, the Company is removing outdated and overly prescriptive language regarding cost-effectiveness – in favor of a direct reference to the Total Resource Cost (TRC) and exception for low-income programs – as well as broadening the language contained within the tariff’s non-monetary assistance provisions, to avoid potential restrictions for how Avista may best provide educational or outreach assistance to its customers. The overall intent of these changes is to allow

Avista to further invest in the communities it serves and to address barriers that exist when considering energy efficiency projects.

These proposed tariff changes were provided to the Energy Efficiency Advisory Group (EEAG or Advisory Group) on October 2, 2023, with further presentation of the verbiage modifications provided at the Company's October 18, 2023 EEAG meeting. No objections or additional feedback was received from EEAG members regarding the tariff changes. The Company and its Advisory Group continue to agree that, although 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 Avista's 2024-2025 Biennial Conservation Plan (BCP), which includes the Company's electric and natural gas Annual Conservation Plans (ACPs) as Appendices B and C, respectively, as well as these proposed tariff revisions within Appendices H (electric Schedule 90) and I (natural gas Schedule 190). Avista respectfully requests that these proposed tariff revisions become effective January 1, 2024.

If you have any questions regarding this information, please contact Meghan Pinch, Manager, Energy Efficiency Program Managers, at (509) 495-2853.

Sincerely,

/s/ Jaime Majure

Jaime Majure
Regulatory Affairs Manager

Cc: Avista Energy Efficiency Advisory Group