

July 19, 2018

Mr. Mark L. Johnson
Executive Director and Secretary
Washington Utilities and Transportation Commission
1300 South Evergreen Park Drive
Olympia, WA 98504-7250

Re: Comments of Renewable Northwest and Northwest Energy Coalition on Docket E-180478: June 7, 2018 Notice of Opportunity to Comment on Electric Utility Energy Independence Act Reports Concerning Conservation and Renewable Portfolio Standards Pursuant to RCW 19.285.070 and WAC 480-109

Renewable Northwest (“Renewable NW”) and the NW Energy Coalition (“the Coalition”) appreciate the opportunity to comment on Avista Corporation’s (“Avista” or “the Company”) June 1, 2018 filing detailing the eligible renewable resources acquired for compliance with the renewable resource targets set forth in Washington’s Energy Independence Act (“I-937”). We recommend that the Commission approve the Company’s June 1, 2018 filing in the above-referenced docket.

We applaud Avista for meeting the 2018 target by acquiring renewable energy rather than through an alternative compliance mechanism. I-937 continues to drive renewable energy investments that diversify Washington’s energy portfolio, leading to a more reliable grid, rate stability, job creation, and progress towards state emissions goals.

However, as in the Company’s 2016 and 2017 compliance reports, Avista’s most recent report provides very little information on incremental cost assumptions. In fact, the supplemental information regarding incremental cost calculations (Appendix B) is confidential, challenging the public’s ability to constructively analyze and comment on the compliance report.

We recommend that the Commission approve the Company’s June 1, 2018 filing in the above-mentioned docket, but we suggest that the Commission direct Avista to increase transparency in its 2019 report with respect to its incremental cost assumptions and calculations. We appreciate the opportunity to submit these joint comments for your consideration.

Sincerely,

Amanda Jahshan, Renewable Northwest

Joni Bosh, NW Energy Coalition

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Records Management
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COMMISSION