

## Avista Corp.

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June 1, 2016

VIA: Electronic

Steven V. King Executive Director and Secretary Washington Utilities & Transportation Commission 1300 S. Evergreen Park Drive S. W. P.O. Box 47250 Olympia, Washington 98504-7250

RE: UE-140801 – Avista's Request for Final 2014 RPS Compliance Determination

Dear Mr. King:

Avista Corporation, dba Avista Utilities or ("Avista" and/or the "Company"), respectfully requests a determination of compliance for its 2014 Renewable Portfolio Standard (RPS) "Compliance Report."

On May 30, 2014, in compliance with RCW 19.285, (Initiative 937 (I-937) or the Washington Energy Independence Act), the Company submitted its 2014 Renewable Portfolio Standard Compliance Report demonstrating its compliance with the renewable energy component of I-937.

In the RPS Report, Avista reported that, as of January 1, 2014, it had 610,906 megawatt-hours of incremental electricity from hydroelectric upgrades and wind generation available for its use in 2014. All of the hydroelectric facilities listed in the Company's RPS Report are located in the Pacific Northwest, and all are owned by a qualifying utility. All of the hydroelectric efficiency improvements listed in Avista's RPS Report were completed after March 31, 1999. Avista has demonstrated that, as of January 1, 2014, it had the right to use 167,884 megawatt-hours of eligible renewable resources, as defined in RCW 19.285.030(10)(b) and WAC 480-109-007(9)(b), in 2013.

On July 31, 2014, in Order No. 01, in Docket No. UE-140801 the Commission provided the following:

(1) The Commission accepts the calculation of 167,884 megawatt-hours as the 2014 renewable energy target for Avista Corporation.

- (2) Avista Corporation has identified eligible renewable resources sufficient to supply at least 3 percent of its load for 2014.
- (3) Avista Corporation has complied with the June 1, 2014, reporting requirements pursuant to WAC 480-109-040.
- (4) Avista Corporation must file a second report no later than June 1, 2016, that provides the information necessary to determine whether Avista Corporation met the 2014 renewable target of 167,884 megawatt-hours.

Per the Commission Order, the Company now seeks a final compliance determination regarding its 2014 compliance. As described in the Company's RPS Report, it met its 2014 target using qualified hydroelectric upgrades. Since the filing of its 2014 Compliance Report, the information and analysis regarding how the Company was to comply with the 2014 target has not changed.

The qualifying generation associated with the hydroelectric upgrades used for 2014 compliance are retired in WREGIS, or in an attestation, and are described in the following table:

WREGIS Generation Unit ID	Generator Plant – Unit Name	Vintage	Certificate Serial Numbers	Total Number Eligible Renewable Resources (MWh)
W1560	Cabinet Gorge Unit 2	2014	1560-ID-129523-1 to 29008	29,008
W1561	Cabinet Gorge Unit 3	2014	1561-ID-129524-1 to 38264	38,264
W1561	Cabinet Gorge Unit 3	2014	1561-ID-133215-1 to 38264	7,544
W1562	Cabinet Gorge Unit 4	2014	1562-ID-129525-1 to 20517	20,517
W2102	Little Falls Unit 4	2014	2102-WA-109698-1 to 4862	4,862
W2103	Long Lake Unit 3	2014	2103-WA-112568-1 to 3270	3,270
W2103	Long Lake Unit 3	2014	2103-WA-109699-1 to 10927	10,927
W1530	Noxon Rapids Unit 1	2014	1530-MT-133190-1 to 21435	21,435
W1552	Noxon Rapids Unit 2	2014	1552-MT-133207-1 to 7709	7,709
W1554	Noxon Rapids Unit 3	2014	1554-MT-133208-1 to 14529	14,529
W1555	Noxon Rapids Unit 4	2014	1555-MT-133209-1 to 12024	12,024
Total Number of RECs and/or Qualifying Hydroelectric Upgrades				170,089

## **Renewable Energy for 2014 Compliance**

The Company retired the qualifying hydroelectric upgrades listed above, and has included screen shots from WREGIS as proof of retirement for 170,089 MWh to the Commission.

The 21,146 MWh from Wanapum qualified hydro upgrades documented in previous filings for 2014 compliance have been removed to be consistent with General Order R-578 (footnote 54 on p. 29). This Order required all qualified resources submitted for 2013 onwards be recorded in WREGIS or that a one-time exemption from the rule be requested. The Company decided against the one-time exemption because sufficient qualified resources for 2014 compliance are already retired in WREGIS.

The Company retired 2,205 MWh more than its 167,884 MWh goal for 2014 because incremental hydroelectric generation is a non-transferrable eligible renewable resource under the Energy Independence Act.

If you have any questions regarding this information, please contact Clint Kalich at 509-495-4532 or myself at 509-495-4975.

Sincerely,

/S/Línda Gervaís//

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