



**Avista Corp.**

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June 2, 2015

***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: Substitute Filing - UE-131056 – Avista’s Request for Compliance Determination

Dear Mr. King:

Avista Corporation, dba Avista Utilities or (“Avista” and/or the “Company”), respectfully requests a determination of compliance for its 2013 Renewable Portfolio Standard (RPS) “Compliance Report.”

On May 31, 2013, in compliance with RCW 19.285, (Initiative 937 (I-937) or the Washington Energy Independence Act), the Company submitted its 2013 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, 2013, it had 541,742 megawatt-hours of incremental electricity from hydroelectric upgrades and wind generation available for its use in 2013. 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, 2013, it had the right to use 166,740 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 September 9, 2013, in Order No. 01, in Docket No. UE-131056 the Commission provided the following:

- (1) Under RCW 19.285.040(2)(a)(i) and WAC 480-109-020(1)(a), the 2013 renewable energy target for Avista Corporation is 166,740 megawatt-hours.

- (2) Avista Corporation has complied with the June 1, 2013, reporting requirements pursuant to WAC 480-109-040.
- (3) By January 1, 2013, Avista Corporation used eligible renewable resources to supply at least three percent of its load for the remainder of 2012, as required by RCW 19.285.040(2)(a)(i) and WAC 480-109-020(1)(a).
- (4) Avista Corporation must file a second report no later than June 1, 2015, that provides the information necessary to determine whether Avista met the January 1, 2013, target, including the specific megawatt-hours and/or renewable energy credits used to meet the target.

Per the Commission Order, the Company now seeks a final compliance determination regarding its 2013 compliance. As described in the Company's RPS Report, it met its 2013 target using qualified hydroelectric upgrades. Since the filing of its 2013 Compliance Report, the information and analysis regarding how the Company was to comply with the 2012 target has not changed.

The qualifying generation associated with the hydroelectric upgrades used for 2013 compliance are retired in WREGIS, or in an attestation, and are described in the following table:

#### Renewable Energy for 2013 Compliance

<b>WREGIS Generation Unit ID</b>	<b>Generator Plant – Unit Name</b>	<b>Vintage</b>	<b>Certificate Serial Numbers</b>	<b>Total Number Eligible Renewable Resources (MWh)</b>
W1560	Cabinet Gorge Unit 2	2013	1560-ID-83943-2 to 8068	8,067
W1560	Cabinet Gorge Unit 2	2013	1560-ID-86403-1 to 20941	20,941
W1561	Cabinet Gorge Unit 3	2013	1561-ID-83944-1 to 17480	17,480
W1561	Cabinet Gorge Unit 3	2013	1561-ID-86404-7108 to 35435	28,328
W1562	Cabinet Gorge Unit 4	2013	1562-ID-793461-1 to 1615	1,615
W1562	Cabinet Gorge Unit 4	2013	1562-ID-81552-1 to 8818	8,818
W1562	Cabinet Gorge Unit 4	2013	1562-ID-83945-1 to 10084	10,084
W2102	Little Falls Unit 4	2013	2102-WA-86701-1 to 4862	4,862
W2103	Long Lake Unit 3	2013	2103-WA-79629-1 to 6783	6,783
W2103	Long Lake Unit 3	2013	2103-WA-81967-1 to 7414	7,414
W1530	Noxon Rapids Unit 1	2013	1530-MT-86378-29997 to 51431	21,435
W1552	Noxon Rapids Unit 2	2013	1552-MT-83935-26366 to 34074	7,709
W1554	Noxon Rapids Unit 3	2013	1554-MT-86398-27104 to 36459	9,356
W1554	Noxon Rapids Unit 3	2013	1554-MT-98793-1 to 5173	5,173
W1555	Noxon Rapids Unit 4	2013	1555-MT-79339-1 to 12024	12,024
<b>Total Number of RECs and/or Qualifying Hydroelectric Upgrades</b>				<b>170,089</b>

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 21,927 MWh from Wanapum qualified hydro upgrades documented in previous filings for 2013 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 2013 compliance are already retired in WREGIS.

The Company retired 3,349 MWh more than its 166,740 MWh goal for 2013 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/Linda Gervais/*

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