



Avista Corp.

1411 East Mission P.O. Box 3727
Spokane, Washington 99220-0500
Telephone 509-489-0500
Toll Free 800-727-9170

May 15, 2017

Via Electronic Mail

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: Docket No. A-130355 - Comments of Avista Utilities on the “Rulemaking to Consider Possible Corrections and Changes in Rules in WAC 480-07, Relating to Procedural Rules”

Dear Mr. King,

Avista Corporation dba Avista Utilities (Avista or Company) submits the following comments in accordance with the Washington Utilities and Transportation Commission’s (Commission) Notice of Opportunity to Submit Written Comments (Notice) issued in Docket A-130355.

The Company supports, in part, the draft rules for Part III B of WAC 480-07 that have been developed by the Commission, with the following comments, and requested clarifications:

WAC 480-07-500 (4): Summary Rejection

A party should be provided an opportunity to correct incidental errors or omissions without otherwise extending the effective date of the tariffs because of a summary rejection of the filing and the need to refile the entire case. An opportunity to correct minor incidental errors or omissions reflects current practice and is more ministerial than substantive.

WAC 480-07-505 (2)(a): Periodic Rate Adjustments

Expand the definition of types of submissions that may not otherwise constitute a general rate filing to explicitly include tracking mechanisms designed to track other charges or costs outside a general rate case.

WAC 480-07-510 (1) Testimony and Exhibits

As is the current practice, the submission of five paper copies for filing should be allowed on the day following the electronic filing of testimony and exhibits. Also, the Company believes that requiring a showing of the effect for each restating and proforma adjustment on a rate of return basis would provide little value as some adjustments would be de minimis on an ROR basis; rather, the Company believes that providing the Revenue Requirement impact of each adjustment would provide more value.

WAC 480-07-510 (3)(a): Work Papers

The Company would like clarification that workpapers are not part of the record, unless introduced into evidence by a party. Workpapers that are provided as supporting documents should only become part of the record after being formally introduced into evidence.

WAC 480-07-510 (3)(c): Work Papers Cross-Referenced

The Company would like some further clarification and guidance regarding the cross-referencing methodology referenced in the rule.

WAC 480-07-515 (1)(b)

The Company would like some further clarification of the types of data to be provided through the end of the most recent month that is available. More discussions of this should occur at the rules workshop

WAC 480-07-515 (1)(f)

The Company would like this section to recognize that each Company could have a different type of power cost mechanism. Accordingly, any affected utility must remove costs and revenues included in its power cost mechanism (e.g. each company may treat production rate base differently in their power cost mechanism).

WAC 480-07-515(3)

The Company believes the Commission should enter a final order within 120-days from the stated effective date of the Tariff changes. The Company believes that the limited amount of data and information presented would generally allow for a shorter timeframe to review and approve.

Avista appreciates the opportunity to provide these comments, and we look forward to participating in the workshop scheduled for June 12, 2017. Please direct any questions regarding these comments to Paul Kimball at 509-495-4584 or paul.kimball@avistacorp.com or myself at 509-495-4975 or linda.gervais@avistacorp.com.

Sincerely,

/s/Linda Gervais/
Manager, Regulatory Policy
Avista Utilities
Page 2