

Avista Utilities Disconnection Reduction Annual Report

Background

On March 17, 2021, Avista filed its first Disconnection Reduction Plan (Plan) in accordance with the Washington Utilities & Transportation Commission's (WUTC or Commission) Order 09, which approved of the Settlement Stipulation (Stipulation) reached in the Company's 2019 General Rate Case. On December 22, 2021, the Commission found that the Company's Plan and accompanying disconnection data to be in compliance with Order 09. The objective of this Plan is to describe the Company's strategy to reduce disconnections, as well as to gather and track disconnection data, with an ultimate goal of substantially reducing the number of customers that lose essential utility service due to non-payment. Included is the Company's annual Disconnection Reduction Report (Report) pursuant to the Stipulation.

Avista developed its original approach for reducing disconnections due to non-payment for residential customers and to the maximum to the extent feasible in partnership with its Energy Assistance Advisory Group (EAAG or Advisory Group),³ as directed in Order 09. The EAAG ultimately determined that the best way to avoid disconnections for non-payment was to address customers' energy burden and overall ability to pay their utility bills. Energy assistance plays a central role in this approach.

To achieve Avista's goal of significantly reducing the number disconnections for non-payment, the Company is taking a multifaceted approach which includes enhanced Low-Income Rate Assistance Program (LIRAP) offerings through the My Energy Discount (MED) program, an Arrearage Management Plan (AMP), and an Arrearage Forgiveness Plan (AFP). The Company also continues to offer flexible payment arrangements, preferred due dates, multiple payment options, and budget alerts. The intention is to offer all customers self-service tools that allow them

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¹ See Final Order 09 in Dockets UE-190334, UG-190335 and UE-190222 (*Consolidated*), issued on March 25, 2020. ² See Section 14(d) of the Stipulation in Docket Nos. UE-190334 and, UG-190335 and UE-190222 (*Consolidated*), at

³ Established as part of Order 07, Dockets UE-140188 and UG-140189 (*Consolidated*), Avista's Energy Assistance Advisory Group members include representatives from the Company, Community Action Agencies, Commission Staff, Aging and Long Term Care of Eastern Washington, The Energy Project, Northwest Energy Coalition (NWEC), Department of Commerce, and the Public Counsel Unit of the Attorney General's Office (Public Counsel).

to manage their energy bills, and for customers that struggle to pay their utility bills, provide them with a variety of energy assistance options to meet their needs.

Disconnection Reporting

Avista performs service disconnections for various reasons including customer requested disconnections, non-payment, and service disconnection between occupants. Service disconnections can be performed utilizing an Outdoor Serviceperson or through the Company's remote disconnect/reconnect capabilities operated through its Advance Metering Infrastructure (AMI) technology. The disconnect data below provides specific details relating to the total number of disconnections performed in 2024 and the number of customers who submitted a payment in the field to prevent service disconnection for non-payment. Statistics on recipients of low-income bill assistance or emergency medical certifications that were ultimately disconnected for non-payment in the previous two years can also be found in the reporting data below.

It is important to note that 2020 through 2023 disconnect data should not be compared to 2024 disconnect data. Disconnects were suspended as a result of the COVID-19 pandemic starting in March of 2020 and did not resume until October 1, 2021. Once disconnections resumed, all disconnect requests were sent to Commission Staff for review and to attempt to reach the customer. This process concluded in October 2022. As a result of the suspension on disconnections and additional review by Commission Staff, the 2020-2022 data is not reflective of standard disconnection trends. Instead, 2024 data should be compared to the Company's baseline disconnect data reflected in its first Disconnection Reduction Plan report filed in this docket on March 24, 2021.

2024 Annual Disconnect Reporting

1. Total disconnections for all purposes:

Avista performed 17,028 service disconnections for all purposes throughout its Washington service territory in 2024. Disconnects identified in this data include customers requesting services to be shut off, disconnections for non-payment and disconnections between occupants. These disconnections were performed either by an OSM or remotely.

Year	2024
All Disconnects	17,028

2. Total disconnections for nonpayment:

Of the 17,028 service disconnections performed in 2024, as defined above, 11,285 of the total services disconnected were due to nonpayment. This number represents disconnections performed by a representative in the field or through the Company's remote disconnect/reconnect technology.

Year	2024
Disconnects Non-Payment	11,285

3. Total remote disconnections and remote disconnection of low-income bill assistance recipients:

Avista completed 16,011 remote service disconnections for all purposes in 2024. Of the 16,011 remote disconnections performed, 3,882 of those disconnections were identified as being low-income energy assistance recipients within the previous two years.

Year	2024
Total Remote Disconnects	16,011
Remote Disconnects Low-Income	3,882
Remote Non-Payment Disconnects	3,782

4. Total disconnections of customers receiving low-income bill assistance:

Of the total disconnections performed in 2024, remotely or through a field representative, 3,869 customers had received low-income energy assistance in the previous two years.

Year	2024
Total Low-Income Disconnects	3,969
Low-Income Non-Payment Disconnects	3,869

5. Total disconnections of customers with a medical emergency verified at the service location within the previous two years:

Customers with a verified medical emergency within the previous two years accounted for 1 of the total disconnections in 2024.

Year	2024
Total Disconnects with EMC	1

6. Number of payments received during field/premise visits to prevent disconnection:

In 2024, the Company performed a total of 11,432 field/premise visits prior to disconnects for nonpayment; of those 8,360 were to low-income customers. Of the 11,432 field/premise visits in 2024, 1,524 customers paid a field representative at the door to prevent disruption in utility services.

Year	2024
Field Visit Payments (Total)	1,524
Field Visit Payments (Known Low-income)	1,165

7. Amount received during premise visits to prevent disconnection and the mode of payment (cash, check, etc.):

The amount collected at customers' doors to prevent service disconnection for non-payment in 2024 totaled \$263,862.20. Payment types collected at customers' doors include cash, debit or credit card, and checks. In addition, at times an OSM will arrive at a customer's residence and learn the customer already submitted a payment at a pay station or an Avista lobby location, which the Company had not been informed of the payment. When this occurs, the field representative completes the collections order as "collected payment from customer," which is reflected in the second table below, titled "Payments Prior to Arrival." A detailed breakdown of the specific payment types and corresponding amounts are reflected in the tables below. Payments prior to arrival totaled \$160,580.89 in 2024. The amount collected in the field to prevent disconnection in 2024 totaled \$424,443.09.

Payments Collected at Door	2024
Cash	\$ 27,171.00
Card	\$ 220,321.35
Check	\$ 16,369.85
Total	\$ 263,862.20

Payments Prior to Arrival	2024
Lobby or Mail	\$ 144,318.00
Pay station	\$ 8,766.89
Bill Assistance	\$ 7,496.00
Total	\$ 160,580.89

Total Payments to Prevent	\$ 424 442 00
Disconnection in the field	\$ 424,443.U9

8. Number of free pay stations:

Avista offers 82 different designated free pay stations and drop box locations throughout its Washington service territory for customers to submit payments in person.

9. Number and nature of customer complaints related to disconnection:

In 2024, zero customers submitted complaints to the Washington Utilities and Transportation Commission (WUTC) regarding potential service disconnection or disconnection of service performed by Avista.