

**BEFORE THE  
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

In the Matter of the Petition of	)	
	)	
AVISTA Corporation dba Avista Utilities)	)	DOCKET NO. UG-19 _____
	)	
For an Order Requesting Exemption of	)	
WAC 480-109-130	)	PETITION OF AVISTA CORPORATION
_____	)	

**I. PETITIONER**

1 In accordance with WAC 480-07-395, the name and address of Petitioner, Avista Corporation (“Avista Corp.” “Avista,” or “Company”), is as shown below. Please direct all correspondence related to this Petition as follows:

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**II. SUMMARY**

2 Pursuant to WAC 480-07-110, Avista Corp. hereby requests that the Commission issue an order approving this petition and allowing for an exemption from WAC 480-109-130, the Company’s annual requirement to file revisions to its tariff WN U-29, Schedule 191 – Demand Side Management (“DSM”) Rate Adjustment. The Company has provided the attached work papers as documentation in support of this request.

### III. REASON FOR REQUESTED EXEMPTION

3 WAC 480-109-130 provides that:

Utilities must file with the Commission for recovery of all expected conservation cost changes and amortization of deferred balances...no later than June 1st of each year with a requested effective date at least sixty days after the filing. If the utility believes that a filing is unnecessary, then it must file a request for exception and supporting documents no later than May 1st of each year demonstrating why a rate change is not necessary (emphasis added).

4 Avista's DSM tariff rider mechanism is designed to match future revenue with budgeted expenditures. To ensure appropriate recovery, the mechanism includes a true-up feature that reconciles the previous periods' actual expenditures and collections. As of March 31, 2019, the Schedule 191 (natural gas) tariff rider balance was approximately \$250,000 overfunded. While this balance might suggest that the tariff revenue is tracking with the anticipated expense level, the Company has also committed, through its Fuel Conversion Transition Plan<sup>1</sup>, that it will transition the funding of its Fuel Efficiency Program (Fuel Conversions) from its electric tariff rider (Schedule 91) to its natural gas tariff rider (Schedule 191) by December 31, 2019. As a result of this change in funding structure, beginning on January 1, 2019, the projected overfunding of the tariff rider balance is now offset by these additional expenditures, with the balance now anticipated to reach close to \$0 by July 2021<sup>2</sup>.

5 Therefore, Avista is requesting no revision to Schedule 191 at this time, to allow for adequate revenue to both fund current energy efficiency operations as well as to mitigate any potential underfunding of the tariff rider balance. The Company will continue to track the progress of this balance, and should the retention of the current tariff rider rate either fail to clear an

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<sup>1</sup> Avista's Fuel Conversion Plan was filed on October 26, 2018 in compliance with Order No. 07 in Docket Nos. UE-170485 and UG-170486 (*consolidated*).

<sup>2</sup> See attached work papers.

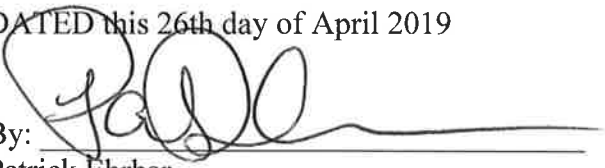
underfunded balance or lead to an overfunded balance at the end of the next twelve month period, Avista will request a revision to clear that balance in its June 1, 2020 filing.

6 The Company provided its request to maintain the current Schedule 191 rates to its Energy Efficiency Advisory Group on Thursday, April 11, 2019 for comments, and received no feedback.

**VI. COMPANY'S REQUEST**

7 The Company respectfully requests that the Commission issue an order approving the Company's request for the continuation of the current rates related to DSM funding in Schedule 191 and exempting the Company from WAC 480-109-130 for the June 1, 2019 filing.

DATED this 26th day of April 2019



By: \_\_\_\_\_  
Patrick Ehrbar  
Director of Regulatory Affairs  
Avista Corp.

