



Avista Corp.

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March 5, 2020

VIA – UTC Web-Portal

Mark L. Johnson
Executive Director and Secretary
Washington Utilities & Transportation Commission
621 Woodland Square Loop SE
Lacey, WA 98503

Dear Mr. Johnson,

Attached for filing with the Commission is an electronic copy of Avista Corporation’s, dba Avista Utilities (“Avista” or “the Company”), proposed modifications to Tariff Schedule 180 “Meter Reading and Billing Practices.” The proposed additions are included in the following tariff sheets, WN U-29:

First Revision Sheet 180a	Canceling	Substitute Original Sheet 180a
First Revision Sheet 180b	Canceling	Substitute Original Sheet 180b
	Delete	First Revision Sheet 180c

I. BACKGROUND

On January 6, 2020, the Company filed with the Washington Utilities and Transportation Commission (Commission) revisions to both electric Tariff Schedule 80 and natural gas Tariff Schedule 180. The purpose of the electric and natural gas filings was to address the low monthly fee, and propose an increase so as to send a more proper price signal to customers as Avista completes the rollout of AMI.

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II. PROPOSED OPT OUT FEE CHANGE

In discussions with the Commission Staff and the Energy Project, the Company has agreed to reduce its proposed opt-out fee filed on January 6, 2020 from \$15.00 to \$10.00. To date, approximately 1,518 customers have elected to Opt-Out of receiving an advanced meter.

As provided in the Company's January filing, given the volume of current and forecasted opt-out customers within the Washington service territory, Avista anticipates additional costs will be incurred to provide the necessary quality of service due to an increase in required network devices.¹

Avista believes that the monthly meter reading charge should be changed in order to send a better price signal to customers. Customers that choose a non-communicating meter will have their meter(s) read by the Company on a quarterly basis, and the one-time fees associated with opt-out would not change. Below are the proposed monthly metering reading fees:

Table No. 1 – Ongoing Monthly Meter Reading Charge

Electric Meter(s) Read Only	Both Electric and Natural Gas Meter(s) Read	Natural Gas Meter(s) Read
\$10	\$10	\$10

Avista's proposed \$10.00 monthly meter reading charge is still below the estimated meter reading cost as shown in its January filing. Even though the charge is well below cost based, we believe it will send a more accurate price signal to those customers who have not yet decided whether or not they may opt out. Even more importantly, now is the time to adjust the rate, in light of the fact that Avista has not yet charged the vast majority of its opt-out customers this rate.²

In its January filing, the Company requested to remove the waiver for its limited income customers and allow for additional rate assistance to be applied to cover the opt-out fee. Since the

¹ See Advice Letter dated January 6, 2020 in Docket No. UE-200013.

² Avista has gradually reduced its meter reading staff by replacing permanent staff with temporary meter readers, with the intent to disband its meter reading staff entirely when AMI deployment is complete. Given the limited amount of customer's currently being charged an opt-out fee, Avista proposes to postpone charging the opt-out fee because meter reading will still occur during the transition phase.

filing in January and given that there are only 126 customers who qualify as low-income who have returned an opt-out application, the Company proposes to keep the following language in its tariff:

Customers who have qualified for energy assistance in the 12 months prior to the estimated installation date of a communicating meter, but who request a non-communicating meter, will not be subject to the “Ongoing Monthly Meter Reading Charge”, but will be subject to the conditions detailed under “One-Time Fee.”

III. CUSTOMER COMMUNICATIONS

Per WAC 480-90-194 (3), Avista will send a notice, provided as Attachment B of the proposed tariff to each customer who has requested and/or completed an application to not receive a smart meter. Also, the following Community Action Agencies will be provided the same notice:

Spokane Neighborhood Action Partners (SNAP) - Spokane County
Rural Resources - Stevens, Ferry and Lincoln Counties
Opportunities Industrialization Center - Grant and Adams Counties
Community Action Partnership - Asotin County
Community Action Center - Whitman County
Washington Gorge Action Programs - Klickitat and Skamania Counties

Avista will continue its practice of responding directly to every customer who raises a concern with advanced metering. We have found this direct approach of providing accurate, understandable, and balanced information to be very helpful and effective to our customers. Once a customer contacts us we will direct them to the Company’s website, or mail them the attached Application Form, they can then return the signed form to Avista in order to process the meter request.

IV. CONCLUSION

Given the feedback and interest from the Commission Staff, the Energy Project and other interested parties regarding this filing, Avista requests that the Commission approve the proposed policy changes as explained in its January 6, 2020 filing, as well as the modifications related to the fee and low income as explained above moving the effective date of April 11, to April 13, 2020. The revised “Non-Communicating Meter” application is also included as Attachment A. The Company continues to access all aspects of its AMI opt out program and its unanticipated issues and commits to continued status reports to the Commission. Please direct any questions regarding this filing to me at 509-495-4975.

Sincerely,

/s/Linda Gervais

Sr. Manager, Regulatory Policy & Strategy
Regulatory Affairs
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