



Avista Corp.

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September 22, 2020

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"), filing of its proposed revisions to the following tariff sheets, WN U-28:

- First Revision Sheet 70-A** Canceling
- Second Revision Sheet 70-B** Canceling
- Second Revision Sheet 70-C** Canceling
- Second Revision Sheet 70-D** Canceling
- Second Revision Sheet 70-E** Canceling
- Second Revision Sheet 70-F** Canceling
- Second Revision Sheet 70-G** Canceling
- First Revision Sheet 70-H** Canceling
- First Revision Sheet 70-I** Canceling
- Second Revision Sheet 70-J** Canceling
- Third Revision Sheet 70-K** Canceling
- First Revision Sheet 70-L** Canceling
- First Revision Sheet 70-M** Canceling
- First Revision Sheet 70-N** Canceling
- Second Revision Sheet 70-O** Canceling
- Second Revision Sheet 70-P** Canceling
- Second Revision Sheet 70-Q** Canceling
- Third Revision Sheet 70-R** Canceling
- Original Sheet 70-S**
- Original Sheet 70-T**
- Original Sheet 70-U**
- Original Sheet 70-V**
- Original Sheet 70-W**
- Original Sheet 70-X**
- Original Sheet 70-Y**

- Original Sheet 70-A**
- Substitute First Revision Sheet 70-B**
- Substitute First Revision Sheet 70-C**
- Second Substitute First Revision Sheet 70-D**
- Substitute First Revision Sheet 70-E**
- First Revision Sheet 70-F**
- First Revision Sheet 70-G**
- Original Sheet 70-H**
- Original Sheet 70-I**
- First Revision Sheet 70-J**
- Second Revision Sheet 70-K**
- Original Sheet 70-L**
- Original Sheet 70-M**
- Original Sheet 70-N**
- First Revision Sheet 70-O**
- Second Substitute First Revision Sheet 70-P**
- First Revision Sheet 70-Q**
- Substitute Second Revision Sheet 70-R**

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Original Sheet 70-Z
Original Sheet 70-AA

The Company also proposes to cancel the following tariff sheets, WN U-28, in their entirety, as the modifications made herein have eliminated the numbering structure used on these former revisions, instead replacing the tariff sheets with a letter-only format as described below:

Canceling	Original Sheet 70-C.1
Canceling	First Revision Sheet 70-F.1
Canceling	Third Revision Sheet 70-F.2
Canceling	First Revision Sheet 70-H.1
Canceling	Original Sheet 70-I.1
Canceling	First Revision Sheet 70-J.1
Canceling	First Revision Sheet 70-K.1
Canceling	First Revision Sheet 70-Q.1
Canceling	Original Sheet 70-Q.2
Canceling	Original Sheet 70-Q.3
Canceling	Original Sheet 70-Q.4
Canceling	Original Sheet 70-Q.5

I. INTRODUCTION

The primary purpose of this filing is to incorporate the amendments made to WAC 480-100 via General Order R-600 in Docket No. U-180525, the rulemaking “Relating to Consumer Protection in Response to Investor-owned Utility Deployment of Advanced Metering Infrastructure (AMI)”. While integrating the newly-adopted rules, Avista found it most beneficial to simultaneously complete a comprehensive update of its Schedule 70, Rules and Regulations, to remedy several issues with overall verbiage and organization of its tariff sheets, as well as update outdated provisions related to meter testing procedures, Company business processes, and pilot programs that have since expired.

II. PROPOSED MODIFICATIONS

Organizational Changes

Avista’s Schedule 70 contains a comprehensive set of the Company’s rules and regulations pertinent to its electric service as provided to its Washington customers. While various incorporations and tariff revisions have been made to the tariff sheets contained in Schedule 70 over the years, some sheets have remained without such modifications for over 20 years, thus producing a tariff set that is,

in some areas, not as cohesive as the Company would prefer, and thereby potentially confusing for an objective reader. As such, an overall reorganization of the tariff has been completed to allow for more consistency in the subject matters being presented and provide an appropriate flow of information. For example, the “Definitions” listed in this tariff have been moved to the beginning of the tariff, with subsequent sections and headers restructured for efficiency and ease of reference by the reader. The Company has inserted a “Miscellaneous Charges” section, rather than having various charges and fees placed sporadically within the tariff, and has also removed a section regarding its “Load Management Pilot Programs”, as these programs expired October 31, 2016.

Lastly, Avista re-formatted its overall tariff sheet labeling structure to align with the Company’s other tariff schedules, which follow an alphabetical arrangement that does not contain numerical subsets such as sheet “F.1” or “F.2”. As such, all tariff sheets containing these numerical subsets were removed and replaced with letter-only sheet names.

Incorporation of WAC 480-100 Amendments

The primary intention of the proposed Schedule 70 revisions is to integrate applicable changes in language or process instituted by the recently-adopted revisions to WAC 480-100. Such revisions include providing a definition for “Applicant” in tariff, updating disconnection notification requirements, incorporating information regarding procedures or fees related to remote disconnection or reconnection, adding verbiage pertinent to customers with medical conditions or emergencies, and establishing in tariff the conditions under which the Company will cease non-voluntary service disconnections during inclement weather events. References and specific language for this tariff has been taken directly from, or aligned in accordance with, WAC 480-100-023, WAC 480-100-128, and WAC 480-100-133.

Specific to disconnection, reconnection, and new customer connection charges, the Company has removed all charges for customers with a smart meter or when a field visit is no longer required to perform these services in accordance with the newly-adopted AMI rules referenced above. In situations when a field visit is still required, the Company has maintained the fees included within the tariff as those fees are still applicable. The Company has also proposed to eliminate its “field visit” fee, previously charged in instances where the Company dispatches an employee for purposes of disconnection, yet no disconnection occurs due to customer payment at the door or other such arrangements. While the labor costs of dispatching such personnel still exist, the Company finds such

a fee to be misaligned with intentions of accepting payment at the door and believes that elimination of this fee is in the best interest of the customers it serves.

Meter Test Procedures

The implementation of AMI in Avista's Washington service territory requires revisions to various tariff references regarding mechanical meters and testing for such meters, as such references may no longer be accurate or have been superseded by new equipment and updated Company processes. To mitigate future outdating of Avista's "Meter Test Procedures" as written in tariff, this section has been modified to remove obsolete references and provide a more broad description of the Company's processes while still maintaining compliance with WAC 480-100-343.

Additionally, the Company has included in these modifications a new \$85 fee applicable to instances where a customer requests a second meter test within a 12-month period, in accordance with WAC 480-100-183(3). This amount is based off the actual costs of providing such a test¹, and is in alignment with, if not well below, the comparable fees set by its fellow utilities. The particular scenario of a second annual customer-requested meter test is rare; there have been only two such requests from Avista's Washington electric and natural gas customers within the past three years. However, as the Company aims to unite its tariffs across the jurisdictions it serves, having such fees stated in tariff seems appropriate, is parallel with Avista's Idaho and Oregon tariffs (which utilize actual costs of the meter testing rather than a set fee), and is in alignment with other regulated utilities in Washington.

III. CONCLUSION

Avista appreciates the hard work and support of all parties involved in the Docket No. U-180525 rulemaking. The amendments made to WAC 480-100 through this process, and incorporated into the Company's tariffs herein, will remain an integral part of Avista's continuous ambition to keep its Customers as the central-focus of all we do. As such, the Company respectfully requests that these tariff modifications become effective for service on November 1, 2020. Due to the comprehensive nature and sheer number of modifications made to tariff Schedule 70, the Company has provided the

¹ It takes approximately 1 hour for a meterman to complete a meter test, which includes drive time to and from a customer's premise. The estimated labor cost, vehicle cost, and tools cost to complete a meter test equates to approximately \$100. The Company has proposed a cost for second meter test in the amount of \$85, rather than the average of approximately \$100 or the full cost, as a conservative approximation for what the test costs. A flat fee is preferred to the actual costs as it is easier to communicate to customers before they confirm a request for the meter test.

Schedule 70 Revisions

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complete tariff in legislative format, included as Attachment A to the filing, in addition to the clean proposed tariff set, for clarity and ease of review by the Commission and its Staff.

If you have any questions regarding this filing, please contact Jaime Majure at (509) 495-7839 or jaime.majure@avistacorp.com.

Sincerely,

/s/ Shawn Bonfield

Shawn Bonfield

Sr. Manager of Regulatory Policy & Strategy

Enclosure