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April 12, 2024

Jeff Killip,
Executive Director and Secretary
Washington Utilities & Transportation Commission
621 Woodland Square Loop SE
Lacey, Washington 98503

RE: Avista Utilities Tariff WN U-28, Proposed Revisions to Tariff Schedule 65 – Interconnection Standards and Tariff Schedule 63 – Net Metering Option

Dear Mr. Killip:

Attached for electronic filing with the Wahington Utilities and Transportation Commission (Commission) are the proposed tariff revisions of Avista Corporation, dba Avista Utilities (Avista or the Company), The Company requesting modifications to the following electric tariff sheets, WN U-28:

First Revision Sheet 65	Canceling	2nd Substitute Original Sheet 65
First Revision Sheet 65A	Canceling	Substitute Original Sheet 65A
Fifth Revision Sheet 63A	Canceling	Substitute Fourth Revision Sheet 63A

The Company requests to cancel the following tariff sheets in their entirety:

Substitute Original Sheets 65B through 65HHHHH

I. INTRODUCTION

The primary purpose of this filing is to modify Avista’s electric tariff Schedule 65, “Interconnection Standards”, to align the processes for interconnecting generating facilities (other than net metering systems) subject to the jurisdiction of the Commission with the processes

provided under Avista’s Open Access Transmission Tariff (OATT) and to modify electric tariff Schedule 63, “Net Metering Option”, to include clarification on the process for interconnecting net metering systems.

In December 2021, Avista filed revisions to its OATT with the Federal Energy Regulatory Commission (FERC) to transition from a first-come, first-served serial interconnection study process to a first-ready, first-served, cluster process. FERC accepted Avista’s filing on June 21, 2022.¹ As part of Avista’s first-ready, first-served cluster process, small generating facilities (generating facilities 20 MW and smaller) are included in a cluster and are processed in accordance with Avista’s first, ready, first-served cluster process. To efficiently conduct its cluster process, it is important to include all generating facilities that are seeking to interconnect within a cluster area in the cluster process. For this reason, Avista is proposing to align its interconnection processes for generating facilities that are subject to the Commission’s jurisdiction with its FERC-approved processes. For generating facilities under 100 kW, or those that elect net metering, the process for interconnection has not changed and will continue to follow WAC 480-108.

II. PROPOSED TARIFF SCHEDULE 65 MODIFICATIONS

In accordance with WAC 480-108-001(1)(b), the Company’s interconnection service tariff is required to be “either equivalent in all procedural and technical respects with the electrical company’s interconnection service offered under its open access transmission tariff approved by the Federal Energy Regulatory Commission, or they must be consistent with this Chapter.” Pursuant to Avista’s proposed revisions to Schedule 65, all generating facilities that are subject to the Commission’s jurisdiction (except net metering systems,² which shall interconnect in accordance with Schedule 63) will apply for interconnection service, and such applications will be processed, in accordance with Avista’s FERC-accepted Small Generator Interconnection Procedures (SGIP).

Although Avista’s SGIP will govern all of the procedural and technical aspects of the interconnection processes, cost responsibility for interconnection costs for generating facilities that

¹ *Avista Corp.*, 179 FERC ¶ 61,183 (2022).

² See RCW 80.60.10(13) (defining “net metering system”).



interconnect with Avista's electrical system in accordance with Schedule 65 shall be governed by the Commission's regulations, WAC 480-106-080 or WAC 480-107-125, as applicable. Finally, small generators interconnecting pursuant to Schedule 65 will enter into a Washington State Small Generator Interconnection Agreement that is subject to the jurisdiction of the Commission and is provided in Schedule 65 Attachment A.

III. PROPOSED TARIFF SCHEDULE 63 MODIFICATIONS

Schedule 65 does not apply to net metering systems. As such, to clarify the interconnection processes for net metering systems, the Company proposes modifications to Schedule 63 to adopt the net metering processes outlined in WAC 480-108-020 for any net metering systems. The proposed modifications simply moves the process the Company is currently following from tariff Schedule 65 to tariff Schedule 63. Included in this filing as Schedule 63 Attachment A is Avista's Net Metering Interconnection Agreement.

IV. CONCLUSION

For the reasons discussed herein, Avista respectfully requests that the Commission approve Avista's proposed Schedule 63 and 65 modifications effective May 17, 2024. If you have any questions regarding this information, please contact me at 509-495-2782 or shawn.bonfield@avistacorp.com.

Sincerely,

/s/ Shawn Bonfield

Shawn Bonfield
Sr. Manager of Regulatory Policy & Strategy

