



**Avista Corp.**

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June 18, 2020

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

Re: Docket No. U-180525 – Comments of Avista Utilities

Dear Mr. Johnson,

Avista Corporation, dba Avista Utilities (Avista or Company), submits the following comments in accordance with the Washington Utilities and Transportation Commission’s (“Commission”) Notice of Opportunity to Submit Written Comments (“Notice”) issued in Docket U-180525 on May 4, 2020, regarding the “Rulemaking to modify existing consumer protection and meter rules to include Advanced Metering Infrastructure.”

The Commission revised its draft rules in response to the comments received in January 2019 and has invited the utilities, stakeholders, and the public to provide feedback on its revised informal consumer protection and meter related rules. Avista has reviewed the draft rules and respectfully provides the following comments:

**Proposed WAC 480-100-128: Disconnection of service**

Subsection 4(e): Avista’s Customer Care and Billing system is limited in its functionality when determining which service should be disconnected for those customers that receive both electric and natural gas service. Determining the service to be disconnected occurs at the time the disconnect order is created. The order for disconnection is generated after the customer has received all notifications as required in WAC 480-90-128. Due to this limitation, the Company does not have the ability to communicate the service that will be disconnected within the notice. For this reason, the Company suggests this requirement to be removed.

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Subsection 6(b): Avista does not support limiting the Company's ability to remotely disconnect customers between the hours of 8:00 a.m. and 12:00 p.m. only. The Company's current practice is to perform remote disconnects between the hours of 9:00 a.m. and 3:00 p.m., which allows a disconnected customer time to resolve the reasons for disconnection and to be reconnected within the same day. The broad timeframe for disconnections enables customer calls to be staggered throughout the day, keeping call volumes manageable. Shortening the Company's window for disconnects hinders the current model used for adequate staffing.

It is important to note that the Company offers a number of free payment methods for customers. In addition to being able to make a payment at a pay station, drop box, or paying in cash at one of the Company's office locations, Avista also offers customers online payment options through its website and pay-by-telephone options, which provide almost immediate account updates. These payment options allow for customers to be reconnected to service in a matter of minutes using their checking account or debit/credit card.

Additionally, the Company is equipped to accept calls outside of standard operating hours through an emergency line. This provides extra support for customers in remedying disconnection, ensuring same day reconnection. With AMI technology, reconnecting electric service is more rapid than ever.

It has been the Company's experience that customers who are facing disconnection know that they will be disconnected, no matter what the time window. However, what customers are most concerned with is how quickly they will be "reconnected," and with AMI remote technology, once the customer satisfies payment, that is only a matter of minutes.

Subsection 6(d): Avista remains concerned with the requirement that it would have to "visit the customer's premises and provide the customer with an opportunity to pay..." before disconnecting a possible low-income customer. This concern is especially true given the advancement in metering technology, as well as the numerous options for customers to pay without leaving their home. Identifying customers who have received low-income assistance or experienced a medical emergency in the prior two-years would be a very labor-intensive and manual process. Low income assistance programs are run separately from connection and disconnection procedures (and in some cases outside the utility entirely). Attempting to track a customer's receipt of assistance, on a rolling basis, to ensure compliance with this requirement is not feasible. Furthermore, identifying customers who are eligible for low-income assistance, or whose medical condition renders disconnection inequitable, is already addressed through the notice and medical emergency provisions in rule. For these reasons Avista strongly urges the Commission to reconsider this requirement.

Avista appreciates the opportunity to provide these comments and looks forward to participating in the Adoption Hearing scheduled for July 13<sup>th</sup>, 2020. Please direct any questions regarding these comments to Amanda Ghering at 509-495-7950 or me at 509-495-2782 or [shawn.bonfield@avistacorp.com](mailto:shawn.bonfield@avistacorp.com).

Sincerely,

*/s/ Shawn Bonfield*

Shawn Bonfield  
Sr. Manager, Regulatory Policy & Strategy