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Nick Brown

ATTORNEY GENERAL OF WASHINGTON

Public Counsel

800 Fifth Ave • Suite 2000 • MS TB-14 • Seattle, WA 98104-3188 • 206-464-7744

April 24, 2025

SENT VIA WEB PORTAL

Jeff Killip
Executive Director and Secretary
Washington Utilities and Transportation Commission
P.O. Box 47250
Olympia, WA 98504-725022

Re: ***Avista Corporation's All-Source Request for Proposals for Resources,***
Docket UE-250155

Dear Director Killip:

The Public Counsel Unit of the Washington State Attorney General's Office (Public Counsel) submits these comments to the Washington Utilities and Transportation Commission (Commission) in response to its Notice of Opportunity to File Written Comments (Notice) in Docket UE-250155. Public Counsel appreciates the opportunity to engage on Avista Corporation d/b/a Avista Utilities (Company or Avista) Draft 2025 All-Source Request for Proposals for Resources (RFP). Public Counsel recommends that the Commission require the Company to submit unredacted versions of the 2025 All Source RFP Exhibits D, Evaluation Methodology, and E, Bid Scoring Summary.

Avista issued its Draft RFP on March 10, 2025, following the Company's 2025 Integrated Resource Plan (IRP) filed on December 30, 2024. Avista's IRP indicated a capacity shortfall within four years. Therefore, the Company issued the all-source IRP seeking proposals for winter and summer capacity to be online by 2029 or earlier, renewable or non-emitting resources, and demand response programs starting as early as 2026. Public Counsel has reviewed the Draft RFP and submits the following comments. Upon review, Public Counsel expresses concern over the redaction of the scoring and weighting details in the evaluation methodology.

In Exhibits D and E, the Company has redacted both the weighting percentages for each category in the evaluation criteria, as well as sub-category scoring details. Based on these redactions, neither interested parties nor the bidders themselves have all the necessary information to comment on the RFP or submit strong proposals.

To: Jeff Killip, Executive Director and Secretary
Re: Avista Corporation's All-Source Request for Proposals for Resources, Docket UE-250155
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From a regulatory perspective, the redaction of this information is a hindrance to transparency and reduces engagement of interested parties. Without the details on scoring and weighting, it is difficult to assess if evaluation categories are being given their due weight in the RFP process. Furthermore, this redaction is not standard practice. The other two electric investor-owned utilities in the state, Puget Sound Energy and PacifiCorp, have both made their scoring and weighting criteria publicly available in their recent RFPs.¹

These redactions are counterproductive from an economic perspective as well. Withholding the full information on how proposals will be evaluated decreases bidders' ability to submit proposals that are likely to be successful. In turn, this increases the potential for an insufficient number of proposals moving forward to meet the needs identified in the IRP.

Public Counsel appreciates the opportunity to provide comments and look forward to reviewing other interested parties' comments and further discussion at the open meeting. If you have any questions about this filing, please contact the undersigned or Callahan Moriyasu at Callahan.Moriyasu@ATG.WA.GOV or 206-521-3212.

Sincerely,



TAD ROBINSON O'NEILL, WSBA No. 37153
Assistant Attorney General, Interim Unit Chief
Public Counsel Unit
800 Fifth Avenue, Suite 2000
Seattle, WA 98104
206-254-0570
Tad.ONeill@ATG.WA.GOV

TRO/CAM

¹ See Initial Filing of Puget Sound Energy, *In re Puget Sound Energy 2024 RFP for CETA*, Docket UE-240532 (filed July 1, 2024); See PacifiCorp Initial Filing, *In re PacifiCorp d/b/a/ Pacific Power & Light Co., RFP*, Docket UE-210979 (filed Dec 29, 2021).