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Avista Corp.

1411 East Mission P.O. Box 3727 Spokane. Washington 99220-0500 Telephone 509-489-0500

Toll Free 800-727-9170

Via: UTC Web Portal

November 6, 2019

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

RE: Comments of Avista Utilities - UE-180738

Dear Mr. Johnson:

In response to Commission Staff's "Petition for Exemption from WAC 480-100-238(4) and (5) dated October 28th, 2019, Avista Corporation d/b/a Avista Utilities ("Avista" or "Company") submits the following comments.

Commission Staff requested that the Commission grant its petition for exemptions from WAC 490-100-238(4) and (5), refrain from its practice of issuing a letter of acknowledgement until December 31, 2020, and issue an order setting the next IRP due dates for January 4, 2021, for the draft IRP, and April 1, 2021, for the final IRP. The Company supports Commission Staff's request to establish due dates of January 4, 2021, for the next draft IRP, and April 1, 2021, for the final IRP which will be filed in a new docket.

Notwithstanding the current IRP process in Washington State, Avista will continue to develop its resource plan for compliance in Idaho, therefore continuing its Technical Advisory Committee meetings to ensure customers have a least cost plan to meet their energy and capacity requirements.

The Company looks forward to working with Commission Staff and all interested parties through upcoming workshops and advisory committee meetings.

If you have any questions regarding this filing, please contact James Gall at 509-495-2189 or John Lyons at 509-495-8515.

Sincerely,

/s/Linda Gervais
Senior Manager, Regulatory Policy
509-495-4975
linda.gervais@avistacorp.com

cc: Mr. Chris McGuire Ms. Deborah Reynolds Ms. Jennifer Snyder Ms. Kathi Scanlon

