

Avista Corp.

1411 East Mission P.O. Box 3727 Spokane. Washington 99220-0500 Telephone 509-489-0500 Toll Free 800-727-9170

May 15, 2020

VIA: Electronic

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

RE: UE-180478 – Avista's Request for Final 2018 RPS Compliance Determination

Dear Mr. Johnson:

Avista Corporation, dba Avista Utilities or ("Avista" and/or the "Company"), respectfully requests a determination of compliance for its 2018 Renewable Portfolio Standard (RPS) "Compliance Report."

On May 31, 2018, in compliance with RCW 19.285, (Initiative 937 (I-937) or the Washington Energy Independence Act), the Company submitted its 2018 Renewable Portfolio Standard Compliance Report demonstrating its compliance with the renewable energy component of I-937.

In the RPS Report, Avista reported that, as of January 1, 2018, it had 650,656 megawatt-hours of incremental electricity from hydroelectric upgrades, qualified biomass and wind generation available for its use in 2018 net of renewable energy certificate sales when the report was submitted. All of the hydroelectric facilities listed in the Company's RPS Report are located in the Pacific Northwest, and all are owned by a qualifying utility. All of the hydroelectric efficiency improvements listed in Avista's RPS Report were completed after March 31, 1999. Avista has demonstrated that, as of January 1, 2018, it had the right to use 512,805 megawatt-hours of eligible renewable resources, as defined in RCW 19.285.030(12)(a), RCW 19.285.030(12)(b), RCW 19.285.030(3) and RCW 19.285.030(12)(d) in 2016.

On August 9, 2018, in Order No. 01, in Docket No. UE-180478 the Commission provided the following:

(1) The Commission accepts the calculation of 512,805 megawatt-hours as the 2018 renewable energy target for Avista Corporation.

- (2) Avista Corporation has identified eligible renewable resources sufficient to supply at least 9 percent of its load for 2018.
- (3) Avista Corporation has complied with the June 1, 2018, reporting requirements pursuant to WAC 480-109-210.
- (4) Avista Corporation's final compliance report must list certificate numbers for every renewable energy credit that Avista Corporation retired in the Western Renewable Energy Generation Information System and details about which certificates were used for its voluntary renewable programs in 2018.
- (5) The Commission Secretary is authorized to accept or approve a filing that complies with the requirements of this Order.

Per the Commission Order, the Company now seeks a final compliance determination regarding its 2018 compliance. As described in the Company's RPS Report, it has met its 2018 target using qualified hydroelectric upgrades, eligible biomass and wind RECs.

The qualifying generation associated with the hydroelectric upgrades, qualified biomass and wind generation used for 2018 compliance are permanently retired in WREGIS and are described in the following table:

Renewable Energy for Avista's 2018 Compliance

WREGIS Generation	Generator Plant – Unit Name	Vintage	Certificate Serial Numbers	Total Number Eligible
Unit ID	Tume			Renewable
				Resources (MWh)
W1560	Cabinet Gorge Unit 2	2018	1560-ID-280538-1 to 18271	18,271
W1560	Cabinet Gorge Unit 2	2018	1560-ID-284475-1 to 10737	10,737
W1561	Cabinet Gorge Unit 3	2018	1561-ID-284476-1 to 26896	26,896
W1561	Cabinet Gorge Unit 3	2018	1561-ID-280590-1 to 18912	18,912
W1562	Cabinet Gorge Unit 4	2018	1562-ID-280591-1 to 20517	20,517
W2102	Little Falls Unit 4	2018	2102-WA-278371-1 to 4862	4,862
W2103	Long Lake Unit 3	2018	2103-WA-280645-1 to 14197	14,197
W216	Nine Mile Unit 1	2018	216-WA-285591-5928 to 9895	3,968
W216	Nine Mile Unit 1	2018	216-WA-277826-4091 to 6454	2,364
W216	Nine Mile Unit 1	2018	216-WA-281708-4001 to 6239	2,239
W216	Nine Mile Unit 1	2018	216-WA-289367-1 to 233	233
W283	Nine Mile Unit 2	2018	283-WA-281714-3677 to 7091	3,415
W283	Nine Mile Unit 2	2018	283-WA-277833-1 to 7333	7,333
W283	Nine Mile Unit 2	2018	283-WA-285597-8491 to 10888	2,398
W1530	Noxon Rapids Unit 1	2018	1530-MT-278266-1 to 21435	21,435

W1552	Noxon Rapids Unit 2	2018	1552-MT-278209-1 to 7709	7,709
W1554	Noxon Rapids Unit 3	2018	1554-MT-280537-1 to 14529	14,529
W1555	Noxon Rapids Unit 4	2018	1555-MT-278210-1 to 12024	12,024
W2906	Palouse Wind	2018	2906-WA-284764-419 to 36979	36,561
W2906	Palouse Wind	2018	2906-WA-292406-156 to 33275	33,120
W2906	Palouse Wind	2018	2906-WA-304258-1143 to 1149	7
W2906	Palouse Wind	2018	2906-WA-304258-1853 to 16868	15,016
W2906	Palouse Wind	2018	2906-WA-288575-816 to 34318	33,503
W2906	Palouse Wind	2018	2906-WA-300386-2046 to 24888	22,843
W2906	Palouse Wind	2018	2906-WA-296392-368 to 18977	18,610
W2906	Palouse Wind	2018	2906-WA-308173-284 to 21475	21,192
W2906	Palouse Wind	2018	2906-WA-312527-118 to 19654	19,537
W2906	Palouse Wind	2018	2906-WA-324371-1 to 19011	19,011
W2906	Palouse Wind	2018	2906-WA-320278-496 to 16301	15,806
W2906	Palouse Wind	2018	2906-WA-324372-323 to 32421	32,099
W2906	Palouse Wind	2018	20% Apprentice Credit (No	53,461
			WREGIS Certificate)	
To	512,805			

The Company retired the qualifying hydroelectric upgrades and the Palouse Wind RECs listed above, and has included screen shots from WREGIS as proof of retirement for 512,805 MWh to the Commission in Attachments A and B.

The REC certificate numbers and screen shots for the 73,906 MWh retired on behalf of Avista's voluntary Buck-A-Block program and the attestation for the 19 MWh from the Rathdrum Solar Project are included as Attachments D and E to this filing. The REC certificate numbers retired for the 540 MWh of the Boulder Community Solar project are also included in Attachment C.

If you have any questions regarding this information, please contact John Lyons at 509-495-8515 or myself at 509-495-2782.

Sincerely,

Is/Shawn Bonfield

Sr. Manager Regulatory Policy and Strategy Avista Utilities (509) 495-2782 shawn.bonfield@avistacorp.com