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Received
Records Management
Aug 30, 2024

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

Re: Tariff WN U-28, Electric Service – WA Wildfire Expense Balancing Mechanism

Dear Mr. Killip:

Attached for electronic filing with the Commission is the following tariff sheet proposed to be effective November 1, 2024:

Third Revision Sheet 88 Canceling **Substitute Second Revision Sheet 88**

Per Order 08/05 in Docket UE-200900, the Commission approved a two-way Wildfire Expense Balancing Account that would track the variability in wildfire expenses Avista makes to address the growing frequency of extreme and dangerous wildfires in Avista's service territory,[1] as proposed by the Company, with certain modifications and clarifications. The proposed tariff sheet reflects an electric rate adjustment to surcharge customers the amount of Wildfire Expense above the current base level amount authorized by the Commission per Order 10/4 in Docket UE-220053 of $5.1 million for Washington electric operations.[2]

Further, in Docket UE-200900 the Commission clarified the operation of the Wildfire Balancing Account as follows in Order 08/05 para(s). 258-259:

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[1] Order 08/05, in Dockets UE-200900, et. al., at p. 2. Also, at para(s). 237 and 238, the Commission stated, "Avista has demonstrated that the circumstances are not normal, but extraordinary. We cannot know, at this time, when the relative threat, risk, and cost of wildfires will no longer be extraordinary and will become normal. But, in time and through utility efforts, Avista must address the challenge, and it appears that any future normal level will be at increased levels appropriately matched to counter the increased threat. ... [W]e find that these extraordinary circumstances warrant an expansive use of the regulatory tools the Commission possesses, including approval of a new wildfire balancing account and of Avista's Deferral Petition."

[2] Order 10/4, Docket UE-220054, para. 150.

> We authorize the Wildfire Balancing Account to operate outside of GRCs to the extent that we expect the account to true up deferral balances annually for return to ratepayers or recovery for the Company, with the first true up occurring on or about September 30, 2022.[323] Modifications to the mechanics of the account, such as the application of a new base level of wildfire expense, additional requirements, or performance-based metrics, should be considered in GRCs.
>
> [[323] We are aware, and we intend, that the first true up will likely occur during the pendency of Avista's next GRC. The Wildfire Balancing Account will function for its first true up as authorized in this Order, with any subsequent true up being subject to any modifications made during GRCs, unless otherwise specifically ordered by the Commission for compelling cause.]
>
> We will review and revise the Wildfire Balancing Account as necessary in Avista's next GRC, which Avista has indicated it intends to file in early 2022. Thus, we require Avista to include with its initial filing proposals for our review of new metrics that should apply in the context of multi-year rate plans, of performance-based measurements that should apply, and of any other proposals for effectively monitoring wildfire expenses.

In the Wildfire Expense Balancing Account, approved by the Commission, Avista is to record the deferral balances (expense levels higher or lower than the GRC established base) into a balancing account recorded as a separate regulatory asset in FERC Account 182.3 (Other Regulatory Assets), and credit FERC Account 407.4 (Regulatory Credit). Interest will not accrue on the unamortized balance.

In accordance with the Commission's Order, as described above, the Wildfire Balancing Account is to operate outside of the Company's GRCs, with an account true-up of the deferral balances annually, for return to ratepayers or recovery by the Company. The Company has not included a carrying charge on the deferral during the amortization period. In order to minimize the number of rate changes experienced by our customers, and to align with other rate changes, the Company is making this filing in coordination with the annual Residential Exchange (Schedule 59) filing, effective November 1, 2024.

The Company is proposing to recover the deferred wildfire costs over a one-year period and will true-up any over or under recovered balance in a future filing. For purposes of rate spread, the Company has applied a methodology that provided a reasonable end result in the Company's prior years filings (Docket UE-220669/UE-230708) as agreed to by the Parties.

As provided in the workpapers accompanying this filing, the total surcharge effective November 1, 2024 is an incremental increase to electric customers of $1.5 million, or 0.2%. Below, Table 1 illustrates the impact by rate schedule:

Table 1 - Impact by Rate Schedule

Schedule No.	Rate Schedule	Change in Billed Revenue
1/7/8	Residential	0.2%
11/12/13/17/18	General Service Schedule	0.3%
21/22/23	Large General Service Schedule	0.3%
25	Ext. Lg General Service Schedule	0.1%
25I	Special Contract	0.0%
31/32	Pumping Service Schedule	0.3%
41-48	Street and Area Lights	0.7%
	Overall	**0.2%**

Enclosed is a set of workpapers which shows the derivation of the proposed per kilowatt-hour rate credit proposed to be effective for a twelve-month period beginning November 1, 2024. Also included in the workpapers is transaction level detail of the expenses incurred during the deferral period.

The average residential customer using 945 kWhs per month will see an increase of $0.23 per month, or approximately 0.2%. The present bill for 945 kWhs is $105.76 while the proposed bill is $105.99. The actual bill change will vary based on customer usage.

In accordance with the requirements of WAC 480-100-103, attached to this filing is a draft notice to customers, which the Company will provide through a bill insert, during the September 2024 bill cycle.

Please direct any questions regarding this filing to me at (509) 495-8601 or Joe Miller at (509) 495-4546.

Sincerely,

/S/ Elizabeth M. Andrews

Elizabeth M. Andrews
Sr. Manager, Revenue Requirements

Enclosures