

**BEFORE THE  
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

In the Matter of the Petition of )  
Avista Corporation, d/b/a Avista Utilities ) DOCKET NO. UE-160100  
For an Order Authorizing Deferred Accounting ) MOTION OF AVISTA CORPORATION  
Treatment Related to the Undepreciated Net Book ) FOR LEAVE TO FILE A REPLY TO  
Value of the Company’s Existing Electric Meters ) ANSWERS OF PUBLIC COUNSEL AND  
THE ENERGY PROJECT )

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1 COMES NOW, Avista Corporation (hereafter “Avista” or “Company”) and respectfully  
requests permission, under WAC 480-07-370(d), to file a Reply to the Answers of Public  
Counsel and The Energy Project filed on February 10, 2016 to Avista’s Petition for an  
accounting order.

2 Because both Public Counsel and The Energy Project mischaracterize the nature of the  
relief Avista is requesting in its Petition, good cause exists under WAC 480-07-370(d) for  
permission to file the attached Reply, in order to remove any uncertainty concerning the scope  
of Avista’s request for an accounting order.

3 Public Counsel, in its Response to Avista’s Petition, argues that, “Avista continues to seek  
a decision from the Commission regarding whether it should invest in AMI.” (See Response at  
para. 5) It then continues by arguing, among other things, that, “[p]lacing the investment on  
hold pending a Commission decision removes the decision-making responsibility from the  
Company and places it with the Commission.” (Id., at para. 7)

4 The Energy Project also objects to the request for deferred accounting, arguing that the  
“Avista petition asked the Commission once again to make the managerial decision for them.”  
(See letter dated February 10, 2016 from The Energy Project to the Commission)

5 Both Public Counsel and The Energy Project apparently misunderstand Avista's request in this Docket, and as a result are mischaracterizing what the Company is requesting of this Commission. In response to Public Counsel and The Energy Project, Avista wants to be clear on what we are and what we are not requesting of the Commission.

6 What Avista is not requesting:

1. Avista is not requesting a "managerial" decision from the Commission of any kind. The Company plans to move forward with the Advanced Metering Infrastructure (AMI) project.
2. Avista is not requesting pre-approval or a determination of prudence of any kind related to AMI in this Docket. We are not requesting a decision by this Commission related to recovery of costs of the existing meters, nor the costs associated with the new AMI investment. On page 5 of our Petition we stated:

We also agree the obligation to demonstrate that both the decision to move forward was prudent, and the costs of installation are prudent, rest solely with the Company, and we will proceed on that basis.

And on page 6:

The recovery of the costs associated with both the AMI Project and the costs of the existing meters would be addressed in a separate, future regulatory proceeding. (emphasis in original)

What Avista is requesting:

1. Avista is requesting authorization from the Commission to move dollars currently recorded in FERC plant accounts to a FERC regulatory asset account at the time the Company signs an agreement with a vendor to replace the existing electric meters.

7 Accordingly, Avista requests that the Commission accept the Company's proposed Reply, as attached, for its consideration.

Respectfully submitted this 12<sup>th</sup> day of February 2016

By:   
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Vice President and Chief Counsel for Regulatory and Governmental Affairs