



Avista Corp.

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July 11, 2018

Via Electronic Mail

Mark L. Johnson
Executive Director and Secretary
Washington Utilities & Transportation Commission
1300 S. Evergreen Park Drive S. W.
P.O. Box 47250
Olympia, Washington 98504-7250

Re: Docket No. A-130355 - Comments of Avista Utilities on Procedural Rules WAC 480-07-160 and WAC 480-07-420

Dear Mr. Johnson,

Avista Corporation dba Avista Utilities (Avista or Company) submits the following comments in accordance with the Washington Utilities and Transportation Commission's (Commission) Notice of Opportunity to Submit Written Comments (Notice) issued in Docket A-130355.

WAC 480-07-160-(2)(b): The draft rule proposes that confidential information be defined under the RCW. The Company would propose, for clarity, the following:

Confidential information means valuable commercial information, including trade secrets or confidential marketing, cost, or financial information, or customer specific usage and account information. ~~information whose disclosure the legislature has limited as valuable commercial information under RCW 80.04.095 or RCW 81.77.210.~~

WAC 480-07-160(4)(c)(vi): The draft rule proposes that the provider must file in separate submissions the redacted and unredacted versions, yet the Commission web portal requests both versions filed in the same submission. The Company would propose, for clarity, the following:

The provider must file the redacted and unredacted versions with the commission at the same time but in separate submissions (other than when filing through the commission web portal).

Avista appreciates the opportunity to provide these comments. Other than the comments above, the Company supports the rest of the draft rules for WAC 480-07-160 and WAC 480-07-420 that have been developed by the Commission Staff.

Please direct any questions regarding these comments to Paul Kimball at 509-495-4584 or paul.kimball@avistacorp.com or myself at 509-495-4975 or linda.gervais@avistacorp.com.

Sincerely,

/s/Linda Gervais/
Senior Manager, Regulatory Policy
Avista Utilities