



Avista Corp.

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July 21, 2015

Via Electronic Mail

Steven V. King
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. U-144155 - Comments of Avista Utilities

Dear Mr. King,

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 U-144155.

On February 18, 2015, the Washington Utilities and Transportation Commission (Commission) filed with the Code Reviser a Preproposal Statement of Inquiry (CR-101) to consider adoption of rules within Washington Administrative Code (WAC) 480-90-178 and WAC 480-100-178, Billing requirements and payment date. This rulemaking considers establishing standards for all regulated energy companies to investigate and issue a retroactive corrective bill for meter errors including, but not limited to, those created by stopped, slowed, erratic or unassigned usage.

The Commission received written comments on the CR-101 on March 23, 2015. In addition, a workshop with interested stakeholders was held on May 20, 2015. As a result of the

written comments and the stakeholder workshop, Commission staff has developed draft rules for review and comment by interested persons.

Avista appreciates the Commission's efforts to clarify the rules regarding corrective bills and also appreciates the opportunity to provide comments on the developed draft rules. Avista supports the intent of the draft rules and offers the following comments and proposed language to provide greater clarity and better align the final rule with existing statutes. In addition, the Company provides as Attachment A an alternative draft rule developed jointly with other utilities. The draft rule in Attachment A represents the viewpoints of the energy utilities including Avista, Pacific Power, NW Natural, and Puget Sound Energy (PSE).

Avista operates under three different state consumer protection rules, in both Idaho and Oregon; the rules address the adjustment of utility bills for over-billing and under-billing. We respectfully request that the draft rules reflect the same adjustments.

The Company offers the following comments to further clarify the draft rules and address certain scenarios in which a bill correction would occur.¹

Corrected Bills: Meter Failure or Malfunction and Billing Errors: Avista operates under three different state consumer protection rules, in both Idaho and Oregon; the rules address the adjustment of utility bills for over-billing and under-billing. We respectfully request that the draft rules reflect the same adjustments.

Unassigned Energy Usage ("UEU"): UEU is unrelated to meter malfunctions or billing errors. Unbilled usage occurs when an account has been inactivated, and there is no customer associated with the account, but where energy usage is still occurring at the premise. In addition, WAC 480-100-128(2)(f) already addresses the billing of unassigned usage. Avista proposes that the UEU issues be considered outside of this rulemaking or at most the Commission could consider including a subsection in these rules to clarify that UEU will be billed by the utility in accordance with WAC 480-100-128(2)(f).

Revenue Requirement Exclusion: Avista proposes not to include any language in the final rule that would require utilities to exclude from their revenue requirement any unbilled charges that exceed six months from the date the error was discovered. Rate making treatment of unbilled charges should be considered as part of a general rate case and are not appropriate to include in this proposed rule.

Communicating Errors With Customers: Avista appreciates Staff's intent and also supports providing customers with information pertinent to the adjustments made on their

¹ These comments are consistent with the other utilities that Avista worked collaboratively with.

account, however, some of the information proposed by Staff may cause confusion. Based on the Company's experiences with its customer communications in all its jurisdictions, Avista proposes the following changes:

- Modify "The full time period in which the meter error affected the customer's bill" to read "The time period covered by the bill correction" and eliminate "the date the error was discovered." The meter may have been malfunctioning for eight months, and yet the Company will be correcting six months of bills. Having multiple dates on the bill will be confusing for customers and may prompt customer complaints.
- Modify "The actions taken to fix the malfunctioning meter" to read "The actions taken to eliminate the cause of the bill correction". Eliminate "The actions taken to prevent a meter error from occurring in the future." This information may not be known at the time the adjustment is made, i.e., problem with a particular make or model of a meter that is recognized after a period of months or years

Avista appreciates the opportunity to provide these comments. If you have any questions regarding these comments, please contact me at 509-495-4975 or at linda.gervais@avistacorp.com.

Sincerely,

/s/Linda Gervais/

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