

July 14, 2017

Mr. Steven V. King  
Executive Director and Secretary  
Washington Utilities and Transportation Commission  
1300 South Evergreen Park Drive  
Olympia, WA 98504-7250

**Re: Comments of Renewable Northwest and NW Energy Coalition on Docket UE-170682: June 13, 2017 Notice of Opportunity to File Written Comments on 2017 Renewable Resource Targets Pursuant to RCW 19.285.070 and WAC 480-109-210(3).**

Renewable Northwest (“Renewable NW”) and the NW Energy Coalition (“the Coalition”) appreciate the opportunity to comment on Avista Corporation’s (“Avista” or “the Company”) June 1, 2017 filing pertaining to compliance with renewable energy targets set forth in Washington’s Energy Independence Act (“I-937”).

We commend Avista for acquiring sufficient eligible renewable energy to meet the 2017 target, and we are pleased that Avista intends to meet the target through acquiring renewable energy rather than an alternative compliance mechanism. The renewable energy acquired since the passage of I-937 has built on our legacy hydropower endowment through efficiency investments in hydroelectric generators and new renewable energy projects in Washington; these investments are diversifying our energy portfolio, cleaning our air, creating new jobs, and leading to more stable energy prices for ratepayers.

We applaud Avista’s efforts to address concerns regarding the reporting of incremental costs that Renewable Northwest and the Coalition raised in response to Avista’s 2016 report. In the 2016 compliance report, we commented on the improper accounting of the negative incremental costs of certain resources. The Company has taken steps to abide by the Commission’s rules adopted in March 2015, which clarified that the result of the incremental cost calculation may be a negative number.

However, similar to our comments in the 2016 compliance report process, Avista’s 2017 report provides very little information on incremental cost assumptions. In fact, the incremental cost section of the report is written the same way as last year’s report, notwithstanding the concerns we previously raised. Additionally, the supplementary information regarding incremental cost calculations shown in Appendix B is confidential.

We recommend that the Commission approve the June 1, 2017 filing in the above-referenced docket, but further recommend that the Commission direct Avista to increase transparency in its 2018 report with respect to its incremental cost assumptions and calculations. We appreciate your consideration of these joint

comments, and look forward to answering any questions at the August 10, 2017  
Open Meeting.

Sincerely,

Amanda Jahshan, Renewable Northwest  
Dina Dubson Kelley, Renewable Northwest  
Joni Bosh, NW Energy Coalition  
Wendy Gerlitz, NW Energy Coalition