

ATTORNEY GENERAL OF WASHINGTON

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September 27, 2017

VIA UTC WEB PORTAL and ABC LMI

Steven V. King
Executive Director and Secretary
Washington Utilities and Transportation Commission
1300 S. Evergreen Pk. Dr. S.W.
P. O. Box 47250
Olympia, WA 98504-7250

Re: Report on Avista Corporation's Notice to Customers on General Rate Case and Proposed Rate Changes, Dockets UE-170485 and UG-170486 (*Consolidated*)

Dear Mr. King:

Pursuant to the procedural schedule, the Public Counsel Unit of the Washington Office of the Attorney General's Office agreed to report the status of Avista Corporation's ("Company" or "Avista") Customer Notice regarding the General Rate Case filing and proposed rate changes. To this point, Public Counsel has submitted three reports to the Commission, on August 7, 2017; August 23, 2017; and September 8, 2017. As per the August 8 letter to the Commission, Public Counsel respectfully submits the fourth and final Customer Notice Report.

On September 12, Public Counsel submitted its second set of comments on Avista's Customer Notice. Throughout the process, Avista has been receptive to comments and edits proposed by both Public Counsel and Staff. Public Counsel's comments focused on highlighting the residential bill impacts resulting from the proposed multi-year rate plan, further detailing the drivers of the proposed rate increase, and clarifying information about participating in the Public Comment Hearings.

Although the Company was generally open to Public Counsel's comments, the final Customer Notice failed to include important edits. First, Avista did not explain to customers that increasing power costs were a major component of their filing, despite Public Counsel's request to include this valuable information. Additionally, Public Counsel suggested adjusting the formatting to aid customers in understanding the bill impact of the multi-year rate plan by highlighting the annual increases. Since the Company's filing involves a multi-year rate plan for both electric and natural gas service,

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the Customer Notice contains a significant volume of information. All of the information in the Notice has educational value, but bill impacts are the most critical aspect of the request from the customer's perspective. As such, a simple formatting change would have better conveyed important information to customers. Furthermore, the Company did not provide Public Counsel with any reason why they excluded the suggested edits from the final draft of the Customer Notice.

Avista intends to include the Customer Notice with forthcoming customer bills, which are likely to arrive in early October. The first Public Comment Hearing is scheduled for November 8 and the Company is required to provide at least 30 days' notice of the hearing. If all goes according to plan, the Company should meet this requirement. Given this condensed timeline, Commission Staff should work to ensure that customers receive adequate notice of their right to register comments with the Commission.

Sincerely

Assistant Attorney General

Public Counsel Unit (206) 389-2055

ARB:cjd Enclosures

cc: Service List (via E-mail and First Class Mail)