



Avista Corp.

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November 2, 2017

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

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State Of WASH.
UTIL. AND TRANSP.
COMMISSION

**RE: Updated Washington Meter Reading and Billing Practices Tariff, Schedule 180,
Tariff WN U-29, Natural Gas Service – Substitute Filing**

Dear Mr. King:

Attached for filing with the Commission is the Company's proposed tariff revision:

Substitute First Revision Sheet 180 Canceling Original Sheet 180

On October 10, 2017, Avista filed to updates its Meter Reading and Billing Practices Tariff, Schedule 180. Based on feedback and consultation with Commission Staff, enclosed is a substitute tariff page to incorporate certain changes and/or clarifications as recommended by Commission Staff.

Specifically, the Company made the following changes:

Section 3: Changed the time-frame for what constitutes a shorter than normal billing period to replicate what is included in the Company's electric tariff Schedule 80. Also, added additional language to make it clear how billing periods for seven days or more will be treated.

Section 4, added additional language to make it clear that the Company's standard practice is to obtain an actual meter reading during the normal billing period of 27 to 35 days per Section 1.

Also, added new language to clarify under what circumstances the Company may attempt to obtain a meter reading beyond the 35 day normal billing period and that the maximum monthly billing period for which a customer may be billed is 45 days in those circumstances.

The Company requests that the tariff revisions described herein become effective on November 13, 2017. If you have any questions regarding this filing, please contact Shawn Bonfield at 509-495-2782 or shawn.bonfield@avistacorp.com.

Sincerely,

/s/ Linda Gervais

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