



**Avista Corp.**

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November 16, 2018

*Via: UTC Web Portal*

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: Avista Utilities 2019 Proposed Tariff Revision Natural Gas Schedule 190

Dear Mr. Johnson,

Attached for filing with the Commission is an electronic copy of Avista Corporation's, dba Avista Utilities ("Avista or "the Company"), proposed revisions to the following tariff sheets, WN U-29:

**Fifth Revision Sheet 190A**                      Canceling                      **Fourth Revision Sheet 190A**

The Company also requests, for housekeeping purposes, cancellation of the following tariff sheets, WN U-29:

**First Revision Sheet 190D**  
**Original Sheet 190E**  
**Original Sheet 190F**  
**Original Sheet 190G**

The Company is requesting these changes to its natural gas tariff Schedule 190—Natural Gas Energy Efficiency Programs—to incorporate provisions from Avista's 2019 Natural Gas Annual Conservation Plan and provide several housekeeping updates as described below:

1. Proposed revisions previously submitted as Appendix E to Avista's 2018-2019 Biennial Conservation Plan, to remove "Minimum measure life of 10 years" from the incentive pay-back table found on Sheet 190A, to add provisions regarding how

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measures with a TRC of less than 1 are incentivized for the low income sector, and to replace references of “Limited Income” with “Low Income” for clarification purposes.

2. Implement a change in the incentive level for residential weatherization measures that are eligible for both electric and natural gas incentives (e.g. windows and insulation). The Company proposes that such measures be incentivized at the higher of the electric and natural gas level, rather than be restricted by the \$3.00/therm formerly used, as long as cost-effectiveness criteria is met. This proposed change was presented to the Advisory Group at its Fall Advisory Group Meeting on October 24, 2018, with the consensus being that as long as cost-effectiveness is still maintained there are no objections to providing the higher of the two available incentives. Further breakdown of this proposed change is provided in the ACP at page 8.
3. For housekeeping purposes, Avista requests cancellation of tariff sheets 190D-90G, as Commission Staff has notified the Company that these sheets are still on file with the Commission, yet have not been utilized in over ten years, with all relevant information having been otherwise incorporated into tariff sheets 190, 190A, 190B, or 190C during that time.

Avista respectfully requests that these changes to natural gas tariff Schedule 190 become effective January 1, 2019. If you have any questions regarding this information, please contact me at 509-495-4975.

Sincerely,

*/s/Linda Gervais/*

Linda Gervais  
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Avista Utilities  
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