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March 31, 2023

Ms. Amanda Maxwell
Executive Director and Secretary
Washington Utilities and Transportation Commission
621 Woodland Square Loop SE
Lacey, Washington 98503

RE: WN U-28 - Avista's Proposed Time-of-Use and Peak Time Rebate Pricing Pilots and Monitoring and Reporting Plans

Enclosed for electronic filing with the Commission is a copy of the following proposed electric tariff sheets:

Original Sheet 007
Original Sheet 008
Original Sheet 017
Original Sheet 018
Original Sheet 084

In this filing, the Company is proposing to implement two separate time-of-use pilot programs and a peak time rebate pilot program. These tariff sheets have an effective date of June 1, 2023 in accordance with the Commission's Final Order (08/05) in Dockets UE-200900, UG-200901, and UE-200894 (Consolidated). Upon approval, the Company will begin marketing and enrolling customers and anticipate customers will begin receiving service under these schedules in Q2 2024, which will start the two-year pilot period. Avista, with input from interested parties, prepared monitoring and reporting plans for each of proposed pilots that will be used to evaluate the pilot during the pilot period. At the conclusion of the two-year pilot period, Avista will engage a third party to evaluate the results of the pilot programs and the Company will make a filing with the Commission to determine the permanency of the time-of-use and peak time rebate rate schedules.

I. BACKGROUND

In the Commission's Final Order (08/05) in Dockets UE-200900, UG-200901, and UE-200894 (Consolidated), at pages 25-28, the Commission approved the Partial Multiparty Settlement

Stipulation, including terms related to pricing pilots. Provided below is language from the Settlement Stipulation detailing the terms agreed to by the settling parties and approved by the Commission's order:¹

Avista agrees to:

- I. Design “opt-in” time-of-use pilots and peak time rebate pilots for electric residential and general service customers. Avista may engage a third party to design the pilots.
- II. Develop monitoring and reporting (M+R) plans for each pricing pilot.
- III. Include language in the M+R plans to measure and evaluate the impact to low income and vulnerable populations.
- IV. Include equity measures in the M+R plans for the residential and general service pilots. (PacifiCorp M+R plans provide one example.)
- V. Provide draft pilots and M+R plans to interested parties by May 31, 2022.
- VI. Convene stakeholder meetings to gather feedback from parties on the draft pilots, or a detailed status update as to the expected timing of draft pilots, and M+R plans. Feedback will include the following:
 - a) General pilot design and design of M+R plans;
 - b) Whether the pilots could provide benefits given Avista’s unique system and customer mix; and,
 - c) Incorporation of equity into the design and implementation of the pilots as it concerns low-income, vulnerable, and marginalized populations.
- VII. File final proposals and M+R plans within six months of convening a stakeholder meeting to gather input and solicit feedback on the Company’s draft proposals, but no later than April 1, 2023, with an effective date of June 1, 2023.
- VIII. Avista will engage a third-party evaluator. This evaluator will consult with Avista and stakeholders to design surveys and data collection efforts.

The Company provided interested parties with initial draft designs of the proposed pricing pilot programs and draft monitoring and reporting plans, as required in Parts I-V, on May 31, 2022. In accordance with Part VI, the Company convened its first meeting with the interested parties on November 14, 2022, and a second meeting was held on January 18, 2023. After the second meeting, it was determined that all input and feedback had been received and issues addressed, and further meetings were not necessary. Below is a listing of interested parties represented at the meetings:

- Staff of the Washington Utilities and Transportation Commission
- The Public Counsel Unit of the Washington Attorney General’s Office
- The Energy Project
- NW Energy Coalition

To the best of Avista’s knowledge, it has addressed concerns raised by these interested parties in the formations of these programs.

¹ The Commission’s approval was with the understanding that the pricing pilots include either explicitly or implicitly, highly-impacted communities in addition to and in all places where low-income and vulnerable populations are referenced in the Settlement.



II. PILOT GOALS AND OBJECTIVES

The goal of the pricing pilots is to determine if the Company should offer an opt-in time-of-use program (TOU) and/or a peak time rebate (PTR) to all residential and/or general service customers as a permanent offering, by measuring the value of time-of-use rates and peak time rebates for residential and general service customers in a pilot program. The pricing pilot design encompasses the following four objectives.

1. **System cost minimization**: reduce costs to serve customers by improving capacity utilization, encouraging economic conservation and peak shaving.
2. **Customer choice**: Offer customers options to help them manage their energy bills.
3. **Equity and accessibility**: Design and offer rates and programs that consider needs and effects on low-income/vulnerable populations and highly impacted communities.
4. **Integration of Renewables**: Investing and integrating renewable resources helps Avista achieve its 100% carbon free goals.

This pilot will provide valuable insights regarding customers' ability, willingness, and experience as it relates to responding to price signals to shift load away from system peaks, thus reducing system costs. Avista plans to capture and measure feedback in a variety of ways to answer the following questions:

1. Will Avista customers show interest in the TOU and PTR pricing, and once they are on the rate, will they respond to the price signals by modifying their electricity consumption?
2. Based on the load impacts quantified in the pilot, can Avista expect meaningful peak demand savings if deployed at a larger scale?
3. What is Avista's low-income/vulnerable customer responsiveness and impact to TOU and PTR pricing?
4. What is Avista's small business customer responsiveness and impact to TOU and PTR pricing?
5. What is the response in a dual peaking load environment, where the industry experience is more limited?
6. Does the price response persist over the course of the pilot?
7. Is one pricing model more or less effective towards objectives than the others?
8. What is the effectiveness of customer outreach, education and support?
9. Are Avista customers satisfied with the TOU and PTR programs as they experience it/them?

Avista is committed to understanding its low income/vulnerable population/highly impacted communities customers' experience with TOU and will study impacts of TOU and PTR on these customers groups. Pursuant to the Settlement provisions of Avista's most recent general rate case², the Company is currently working in consultation with its Energy Assistance Advisory Group (EAAG) to refine specific program design and implementation issues associated with its proposed Low-Income Rate Assistance Program (LIRAP) Bill Discount. This Bill Discount, anticipated to

² See Dockets UE-220053, UG-220054, UE-210854 (Consolidated), Final Order 10/04.



become effective October 1, 2023, will be available to eligible customers taking service under both Avista’s residential service schedules (electric Schedule 001 and natural gas Schedule 101) inclusive of those taking service under the proposed time-of-use Schedule 007 and Schedule 008 discussed below.

III. TIME-OF-USE PILOTS

Avista has evaluated a number of potential TOU programs, and is proposing two TOU pilot programs:

1. Time-of-Use–Residential (Schedule 007) and Time-of-Use–General Service (Schedule 017):
This pilot program is referred to as “TOU-A” throughout this document and is a traditional time-of-use structure with on-peak and off-peak rates that vary based on season (Winter and Summer).
2. Time-of-Use with Morning Discount–Residential (Schedule 008) and Time-of-Use with Morning Discount–General Service (Schedule 018):
This pilot program is referred to as “TOU-B” throughout this document and are Schedules 007/017 that add a “morning discount” (super off-peak) rate in the summer season in addition to the traditional on-peak and off-peak rates that vary by season.

The Company originally proposed the pilots last for a period of three years, but after discussion with interested parties, the consensus was that the pilots will last for a two-year period. The pilots will be available to Schedule 001 residential customers, inclusive of those who currently benefit from rate discount Schedule 002, and Schedule 011 general service customers. Customers must have an AMI meter to participate. All pilot programs will be offered as an “opt-in” option to qualifying customers. For the first year, customers will receive a price-guarantee that will ensure they will pay no more than 10% above the amount they would have paid under their default rate schedule. Customers may opt-out of the program at any time and return to their default rate. However, they will not be allowed to re-enroll in the TOU rate for one year. At the end of the participant’s first annual period on the program, a notification will be sent to the participant informing them of their net savings or cost relative their default rate schedule.

Electric Vehicle (EV) charging will be treated like all other loads and there are no special rate accommodations included in the proposed pilots, given that Avista already has an independent EV charging TOU rate for commercial customers, and two other Northwest utilities are studying a special evening super off-peak rate for EV charging. However, in Avista’s proposed TOU-B program discussed below, there is a “morning discount” time period in the summer season available to EV customers to receive electricity below the “off-peak” rate.

While designing our proposed pilots, the current and proposed pricing pilot programs of PacifiCorp (PAC) and Puget Sound Energy (PSE) were taken into consideration. Both utilities have held several conversations with interested parties and worked through issues of importance, which have been captured in Commission tariff filings and shared with Avista by the interested parties. Our proposed pilots have several key design elements in common with these utilities, but



have been tailored to fit Avista’s unique system and load characteristics and also provide a variation from the other utilities current pilot offerings. This allows Avista and the other utilities in Washington the opportunity to learn concurrently from several variations of TOU and PTR pricing pilots.

Avista has modeled a TOU pricing program in its electric Integrated Resource Plan (IRP) for over a decade, and with the recent implementation of AMI meters in the Washington we are now able to offer these programs.

Determining Time-of-Use Pricing Periods:

Determining the peak-rate periods was performed by analyzing Avista’s system hourly load data and hourly Mid-C pricing data from January 1, 2018 through February 1, 2022. A detailed cluster analysis of the system load shape and marginal energy costs was used to determine the winter/summer seasons, peak and off-peak periods (shown in Illustrations No. 1 and 2). Further analysis was performed by utilizing Avista’s 2020 Electric Integrated Resource Plan (IRP). Estimated peak load growth is 0.3% in the winter and 0.4% in the summer. Avista anticipates continuing to be a winter-peaking system, but in years with mild winters and hot summers, the annual maximum peak load could occur in the summer.

Illustration No. 1 - Historical Avista System Loads: 1-1-2018 through 2-1-2022

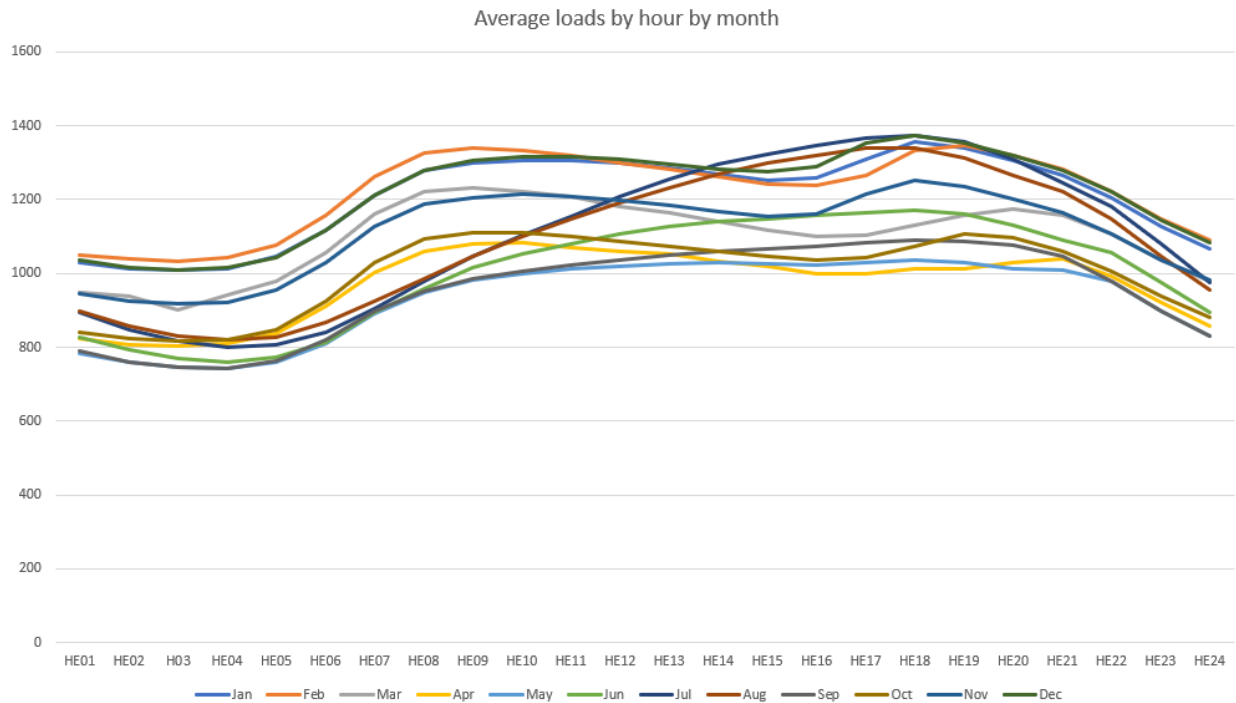
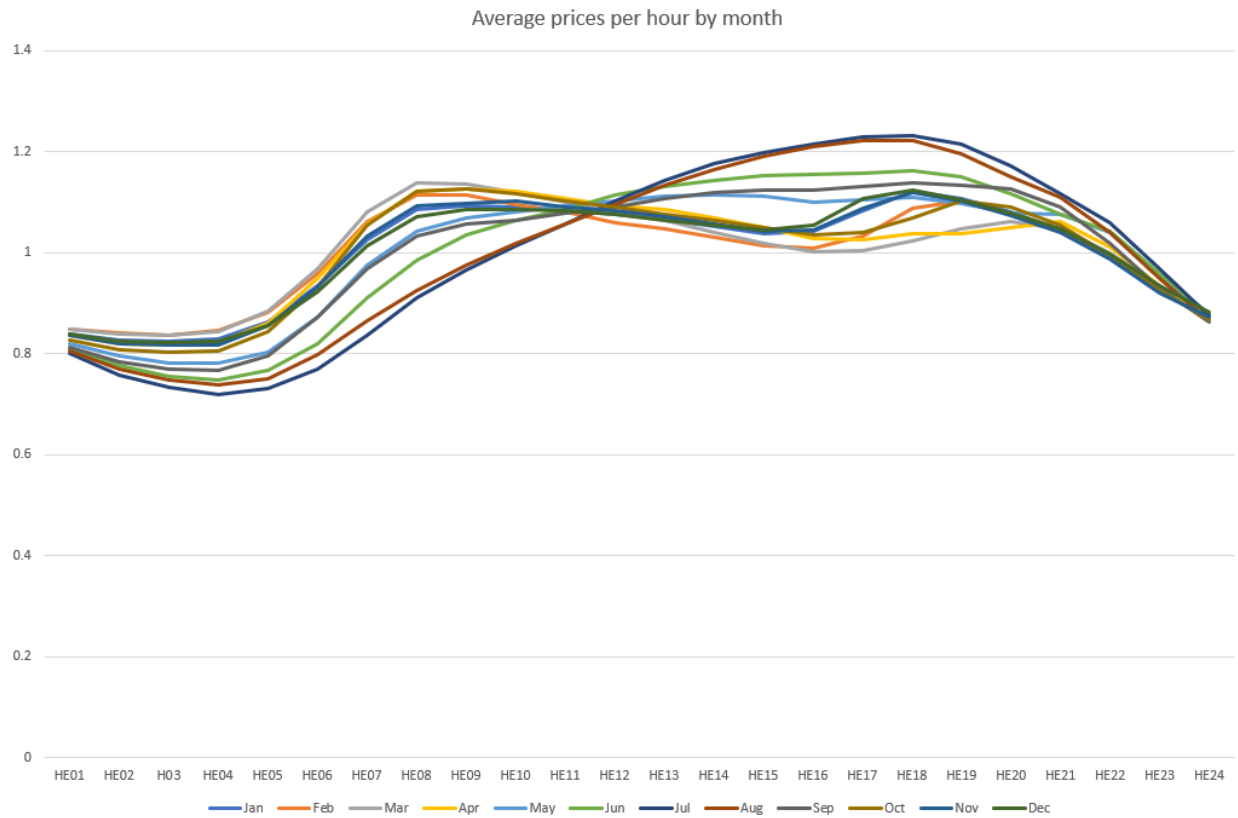


Illustration No. 2 - Historical Mid-Columbia (Mid-C) Prices: 1-1-2018 through 2-1-2022

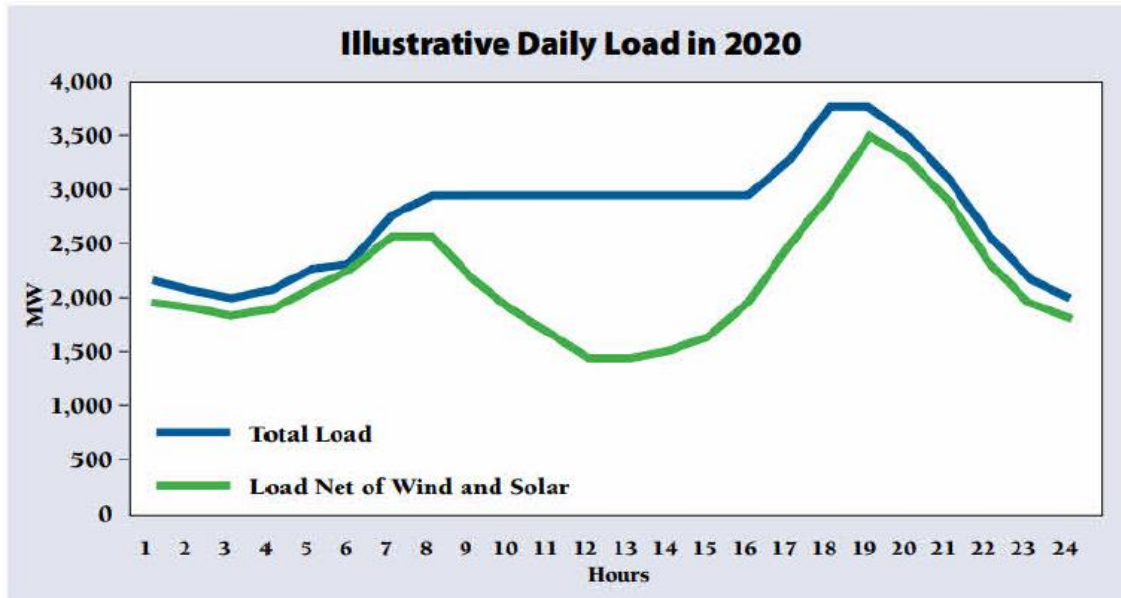




Further consideration in the design of peak-rate periods is the role of non-dispatchable renewable resources and their impact on the load to be served. Avista’s most recent Electric IRP shows customer-installed solar continues to increase, although not at the historical rate. Nonetheless, the shift to clean energy and the global drive to reduce greenhouse gases are expected to increase customer-owned solar renewable resources. This will thereby reduce overall loads during mid-day, which will exacerbate the ramp-rate of generation resources to meet afternoon peak unless more loads can be shifted to mid-day to balance the increased solar generation at that time. This phenomenon has been coined the “duck curve” due to the chart’s resemblance to a duck, as shown in Illustration No. 3 on the following page.



Illustration No. 3 – Example of Impacts of Solar Generation in California³



Avista’s Energy Resources team further noted the importance of mitigating the steep ramp in the afternoon. The design of load-shifting pricing-programs needs to reduce loads during this ramp period to allow for generation resources to be spun up. Potential impacts to the wholesale power market from TOU pricing designs will also be evaluated both in the design process and throughout the pilot.

This analysis resulted in two peak seasons for Avista, winter and summer. The months of April, May and October had relatively flat load and pricing curves and don’t fit in perfectly with either season. Accordingly, two TOU programs were developed: The first (TOU-A) closely matches the timing of Avista’s Electric Vehicle (EV) TOU rate schedules (013 and 023); the second (TOU-B) was designed to prepare for the increased renewable generation impacts on Avista’s system. A morning discount rate in the summer season was developed in the TOU-B rate to encourage customers to shift their energy consumption to match renewable generation resources more closely, and thereby reduce the loads in the afternoon that contribute to the steep ramp rate. Table No. 1 on the following page provides a summary of the two TOU pilot programs:

³ Source: Regulatory Assistance Project (<https://www.raponline.org/wp-content/uploads/2016/05/rap-lazar-teachingducktofly-2014-jan.pdf>)

Table No. 1 - Proposed Pricing TOU Pilot Periods

| Pilot Program | Season | Months | On-Peak Hours (Weekdays) | Off-Peak Hours* | Morning Discount |
|---------------------------------------|---------------|------------------|---------------------------------|---------------------------|-------------------------|
| TOU - A Sch. 007 & 017 | Summer | April - October | 2pm - 7pm | All other hours | n/a |
| | Winter | November - March | 6am - 9am & 5pm - 8pm | All other hours | n/a |
| TOU - B Sch. 008 & 018 | Summer | May - September | 2pm - 7pm | 7pm - 9am & 12pm - 2pm | 9am - 12pm |
| | Winter | October - April | 6am - 10am & 5pm - 9pm | All other hours | n/a |

*All hours on weekends and holidays are off-peak hours.

Proposed Time-of-Use Pricing Calculation:

To calculate the rates for the various seasons and time periods offered in these TOU programs, the Company began by using Avista’s most recent cost of service study results for residential and small business classes.

1. Calculate Off-Peak Rate (TOU-A and TOU-B):
 - a. Calculate off-peak rate to reflect embedded transmission, distribution, and production costs embedded in rates, less the current retail revenue credit rate.

2. Calculate a Morning Discount Rate (TOU-B only):
 - a. The morning discount rate for the summer season in TOU-B was set to two-thirds of the off-peak rate, which is in line with similar “super off-peak” pricing seen at other utilities and comparable with the total transmission and distribution costs embedded in rates.

3. Calculate On-Peak (TOU-A and TOU-B):
 - a. Allocate the remaining costs (net of revenue from peak hours and revenue from fixed charges) equally across off-peak periods (solves for the corresponding rates) to ensure revenue neutrality.

On the following page, Table No. 2 summarizes the Company’s current rate structure and resulting proposed pilot rate structures for Schedule 001 (Residential) and Table No. 3 summarizes the Company’s current rate structure and resulting proposed pilot rate structures for Schedule 011 (General Service) based on current base rates in effect.⁴

⁴ The current base rates and the proposed rates for TOU-A and TOU-B in the table are based on the rates in effect from Docket UE-220053 effective 12/21/2022 and will change when the approved Year 2 base rates go into effect from that filing effective 12/21/2023.



Table No. 2 – Comparison of Current Rates and Proposed TOU Rates (Residential)

| Residential | | | | |
|------------------------------------|---------------|------------------|----------------|----------------|
| | | <u>Current</u> | <u>TOU - A</u> | <u>TOU - B</u> |
| | | <u>Sch 01/02</u> | <u>Sch 007</u> | <u>Sch 008</u> |
| First 800 kWh | <i>\$/kWh</i> | \$ 0.08832 | | |
| 801 - 1500 kWh | <i>\$/kWh</i> | \$ 0.10381 | | |
| 1501 kWh + | <i>\$/kWh</i> | \$ 0.12286 | | |
| Basic Charge | <i>\$/mo.</i> | \$9.00 | \$9.00 | \$9.00 |
| <u>Winter</u> | | | | |
| On-Peak | <i>\$/kWh</i> | | \$ 0.22408 | \$ 0.18310 |
| Off-Peak | <i>\$/kWh</i> | | \$ 0.06586 | \$ 0.06586 |
| On-Peak to Off-Peak Ratio | | | 3.4 | 2.8 |
| <u>Summer</u> | | | | |
| On-Peak | <i>\$/kWh</i> | | \$ 0.22691 | \$ 0.23039 |
| Off-Peak | <i>\$/kWh</i> | | \$ 0.06586 | \$ 0.06586 |
| Morning Discount | <i>\$/kWh</i> | | n/a | \$ 0.04391 |
| On-Peak to Off-Peak Ratio | | | 3.4 | 3.5 |
| Morning Discount to Off-Peak Ratio | | | n/a | 0.7 |

Table No. 3 – Comparison of Current Rates and Proposed TOU Rates (Non-Residential)

| Non-Residential | | | | |
|------------------------------------|---------------|------------------|----------------|----------------|
| | | <u>Current</u> | <u>TOU - A</u> | <u>TOU - B</u> |
| | | <u>Sch 11/12</u> | <u>Sch 017</u> | <u>Sch 018</u> |
| First 3650 kWh | <i>\$/kWh</i> | 0.12056 | | |
| 3651 + kWh | <i>\$/kWh</i> | 0.08773 | | |
| Basic Charge | <i>\$/mo.</i> | \$21.00 | \$21.00 | \$21.00 |
| Demand (above 20kW) | <i>\$/kW</i> | \$7.50 | \$0.00 | \$0.00 |
| <u>Winter</u> | | | | |
| On-Peak | <i>\$/kWh</i> | | \$ 0.23021 | \$ 0.19327 |
| Off-Peak | <i>\$/kWh</i> | | \$ 0.09165 | \$ 0.09165 |
| On-Peak to Off-Peak Ratio | | | 2.5 | 2.1 |
| <u>Summer</u> | | | | |
| On-Peak | <i>\$/kWh</i> | | \$ 0.23688 | \$ 0.25420 |
| Off-Peak | <i>\$/kWh</i> | | \$ 0.09165 | \$ 0.09165 |
| Morning Discount | <i>\$/kWh</i> | | n/a | \$ 0.06110 |
| On-Peak to Off-Peak Ratio | | | 2.6 | 2.8 |
| Morning Discount to Off-Peak Ratio | | | n/a | 0.7 |



The rates in Table No. 2 and No. 3 are base rates only and subject to the adder schedules that the customers would be subject to on their default rate schedule. Schedules 007 and 008 will be subject to the same adder schedules as Schedule 001 and Schedules 017 and 018 will be subject to the same adder schedules as Schedule 011, inclusive of DSM, LIRAP, Decoupling, etc.

IV. PEAK TIME REBATE PILOT

A Peak Time Rebate (PTR) program is considered an “active” energy price response or dispatchable. It is typically triggered by wholesale market prices and not grid problems. Industry best practice dictates the PTR rate should reflect the customer’s opportunity cost for consuming electricity during critical peak events. In other words, the rebate amount should account for the fact that the customer avoids paying by not consuming electricity.

A PTR is calculated by subtracting what a customer used during the “event” window from their baseline. Baseline calculation methods are of primary importance for this program, and require a balance between accuracy (complexity) and ease-of-use (simplicity). The Company developed its customer baseline calculation with the following key objectives:

- Accuracy: the baseline should estimate what the customer would have used on the event day as accurately as possible.
- Simplicity: the calculation should be as simple as is feasible while maintaining the desired level of accuracy. The utility will want the baseline to be easy to understand and have a low cost to calculate.
- Cost Effective: minimize payouts to non-participants, to the best extent possible.

With the above considerations, the Company is proposing that PTR Credits will be calculated by comparing a customer’s past usage metered to the usage metered during the Event Day. Past usage metered shall be calculated by examining the usage metered for the ten business days preceding the Event Day, excluding weekends, listed legal holidays, and any other Event Day(s), to determine the Baseline Days. Baseline Days shall be the three days in the ten-business day period with the highest usage metered during peak periods.

PTR is calculated in the same way as Critical Peak Pricing (CPP). They are often referred to being mirror images of each other. PTR is incentive only (carrot) and CPP is more costly for customer’s going over their baseline (stick). PTR credits have the potential to pay some customers for doing nothing because of the random variations in their electricity use. As a result, the potential for revenue loss for Avista associated with a PTR program is significant. It will be important for Avista to fully understand the negative implications of the PTR program and mitigate the risk as best as possible. Choosing a baseline methodology that minimizes the revenue loss can also minimize the rebate for customers who choose to respond to the event. The need to balance the incentive for participation with minimizing revenue loss is an important consideration.

Peak Time Rebate (PTR) Rate:

Avista determined a PTR rate of \$0.40/kWh and estimates 15-20 events per year will be called for 2–6-hour blocks with day ahead notification. The \$0.40/kWh (\$400 MWh) attempts to strike a balance between actual power supply benefit that would result in the event to actually be called while also sending a meaningful price incentive in order to result in measurable customer response.

The rebate amount earned by customers will be accounted for as a power supply cost to the Company and credited to the customer through a newly created adder schedule tariff, Schedule 084, which will be applicable to the rate schedules identified below.

V. CUSTOMER SELECTION AND ENROLLMENT

In order for the results of this pilot to be statistically valid, each pilot program offered will need a minimum of 100 customers in each of the customer classifications below, but not to exceed 500 for each pilot program.

- Residential (Schedules 007/008/084)
- Small Business (Schedules 017/018/084)
- Low Income (inclusive of Schedule 002)⁵

Avista plans to recruit a statistically appropriate sample size of customers in each treatment group through various customer outreach and enrollment activities. Customers participating in the time-of-use pilots will receive preference when recruiting and selecting participants for the peak time rebate pilot. Avista may also consider commissioning a customer survey to better understand customers knowledge and interest in this type of program. This will require Avista to communicate to customers why Avista is offering the pilot, to share with customers educational materials detailing the concepts Avista is seeking to address, terms and conditions of participation, and steps to enroll. A personalized on-line savings comparison tool will be offered to customers to learn if a TOU rate plan would be beneficial to them over their standard rate option. This tool may be leveraged to provide monthly feedback to enrolled TOU participants comparing rates. Avista will also consider any other information or digital tools that help educate participants on how the pilot rates would impact their bills with respect to their expected behavior. Given that some customers may not have access to digital tools, Avista will have enrollment opportunities through customer service representatives.

Industry research has shown residential customers tend to respond to recruitment efforts better than small business (general service) customers. Barriers to participation for small business customers include the following:

- Challenge to reach decision maker;
- Peak times are often during small business's core hours of operation and not worth shifting business operations; and
- Customers can view the TOU pricing and/or PTR pricing as de minimis in their overall business expense.

Avista has identified several outreach strategies and outlined them in Attachment B M&R Plan in an effort to recruit a statistically valid sample.

⁵ Low Income customers would take service under Schedules 007 or 008 and would be separately identified for monitoring and reporting purposes.

VI. MONITORING AND REPORTING (M+R) PLAN

The Company prepared monitoring and reporting plans for each of the pilots that are included as attachments (Attachments A – C). To leverage the extensive work already performed by interested parties, including Commission Staff, in other proceedings, Avista utilized the M+R Plan submitted by PacifiCorp in Docket UE-191024 as the starting point when drafting our plan. They were further updated as a result of interested party feedback.

VII. TIMING FOR PILOT DEVELOPMENT, FILING, AND GO-LIVE

The following schedule was developed based on consensus reached with interested parties:

- Late 3rd Quarter or Early 4th Quarter 2022: Convening first interested parties meeting to gather feedback. This timing is to reflect that all of the parties are involved in many, substantive processes and cases, and Avista would like to give enough time for a thorough review and feedback.
- 4th Quarter 2022 – 1st Quarter 2023: Follow-up virtual meetings with interested parties, as needed.
- No later than April 1, 2023: Submit pilot proposals to the Commission with an effective date no later than June 1, 2023.
- 3rd Quarter 2023 – First Quarter 2024: After Commission order on final pilot programs, begin to execute customer communication, outreach and recruitment efforts, incorporating any final program changes that are otherwise unknown by Avista prior to approval.
- 2nd Quarter 2024: Go-live of pilot programs.

With this filing, the Company has completed the first three items above and believes the remaining schedule remains reasonable up to the go-live date of the pilots. The Company estimates it will take approximately 9 to 12 months after the final pilot programs are approved by the Commission to go-live in order to allow sufficient time for customer communication, outreach and recruitment, resulting in a planned go live in the 2nd Quarter of 2024. This schedule is subject to change based on the timing of Commission approval and customer recruitment results.

VIII. PILOT PROGRAMS COST

The total amount Avista estimates it will spend on these pricing pilots through 2026 is \$3.3 million. Avista is not requesting recovery or deferral of these program costs with this filing as they will be included in a future general rate case filing and subject to review for recovery in that proceeding. The estimated expenditure breakdown by year is shown in Table No. 4 below.

Table No. 4 – Estimated Capital and Expense for Pilot Programs

| Category | Pre-Pilot 2023-2024 | 1st Year of Pilot 2024-2025 | 2nd Year of Pilot 2024-2025 | Total Pilot Costs 2024-2025 | Post Pilot Full Program Enhancements 2026+ |
|--------------|------------------------|-----------------------------------|-----------------------------------|-----------------------------------|---|
| Capital | \$ 1,500 | \$ 375 | \$ 375 | \$ 2,250 | \$ 750 |
| O&M | \$ 105 | \$ 470 | \$ 475 | \$ 1,050 | TBD |
| Total | \$ 1,605 | \$ 845 | \$ 850 | \$ 3,300 | \$ 750 + |

**Amounts above shown in thousands*

Table No. 5 provides the approximate allocation of the estimated costs to execute the pricing pilots, including enhancements needed to move the pilot to a full program in 2026. These costs are subject to change as the pilot moves through the design, deployment, and execution phases.

Table No. 5 – Expenditure Breakdown

| Category | Cost |
|--|-----------------|
| Implementation - Capital | \$ 3,000 |
| Marketing | \$ 450 |
| Evaluation, Measurement & Verification | \$ 300 |
| Program Management | \$ 300 |
| Total | \$ 4,050 |

**Amounts above shown in thousands*

Information Technology development and management expenses make up a significant portion of the pilot expenses. These pricing pilots will require custom configurations of Avista’s meter data management and customer billing systems to allow the Company to document the appropriate usage data and apply multiple time-varying pricing structures, along with implementation of technology for PTR settlements. This will also require software updates to review the customer bill presentment. Finally, Avista plans to leverage technology solutions to support its education, outreach, enrollment, and participation tracking efforts which will require similar custom configuration and integration of any associated digital tools.

Educational, outreach, and enrollment costs will include production of materials, costs associated with initial implementation, and continued customer communications through the life of the pilots. The Company will promote enrollment in the program across multiple channels that may include:

- Bill messaging
- Website
- Newsletters
- Targeted email announcements
- Social media posts



- Outreach through Avista’s Energy Assistance Advisory Group, Energy Efficiency Advisory Group, Equity Advisory Group, and other applicable organizations
- Outreach conducted in languages other than English in line with local customer demographics

To assist the adoption and success of income qualified customer in the TOU pilot programs, Avista will provide a free smart thermostat to those customers whose HVAC systems meet the following eligibility criteria. Funding will be provided by Avista’s Schedule 91, energy efficiency rider.

- Electric space heating system compatible with a low-voltage thermostat
- HVAC system in good working order
- Proper wiring compatibility for a smart-thermostat
- WiFi in home
- If tenant occupied, need landlord approval

XI. PILOT CONCLUSION

As discussed above, the Company is requesting the effective date of the proposed tariffs be June 1, 2023 in accordance with the Commission’s Final Order (08/05) in Dockets UE-200900, UG-200901, and UE-200894 (Consolidated). Upon approval, the Company will begin marketing and enrolling customers and anticipate customers will begin receiving service under these schedules in the Second Quarter of 2024, which will start the two-year pilot period. It is the Company’s intent that these pilot programs are successful and result in a full rollout of time-of-use and/or peak time rebate rates to our customers in Washington. At the conclusion of the two-year pilot program, participants will have the option to return to their default rate schedule or remain on the pilot rate schedule until the final evaluation of the pilot is completed and the Company makes a filing with the Commission to determine the permanency of time-of-use and/or peak time rebate rates.

Please direct any questions related to this filing to Marcus Garbarino (509.495.2567 or marcus.garbarino@avistacorp.com) or Joe Miller (509.495.4546 or joe.miller@avistacorp.com).

Sincerely,



Patrick Ehrbar
Director of Regulatory Affairs