

**Avista Corp.**

1411 East Mission Ave.
P.O. Box 3727
Spokane, WA 99220-0500
Telephone: 800-727-9170

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Washington Utilities & Transportation Commission
621 Woodland Square Loop SE
Lacey, WA 98503

VIA Overnight Mail & Commission Web Portal

Dockets UE-240006 and UG-240007

Attention: Kathy Hunter, Acting Executive Director and Secretary

TARIFF WN U-28, ELECTRIC SERVICE, and
TARIFF WN U-29, NATURAL GAS SERVICE

Avista Corporation (“Avista” or “the Company”) hereby submits the attached filing seeking Commission authorization to increase its rates and charges for its electric and natural gas services to its electric and natural gas customers in the State of Washington. In this filing, the Company is proposing a base revenue increase which would begin with new rates effective December 21, 2024.

The Company is proposing a Two-Year Rate Plan, which would begin with new base rates effective December 2024 (Rate Year 1) and December 2025 (Rate Year 2). For Rate Year 1, the proposed increases reflect electric base rate relief of approximately \$77.1 million, or 13.0% (12.6% on a billed basis), and natural gas base rate relief of \$17.3 million, or 13.6% (6.3% on a billed basis), effective December 21, 2024. For Rate Year 2 of the Two-Year Rate Plan, the proposed increases reflect electric base rate relief of \$53.7 million, or 11.7% (7.8% on a billed basis after taking into account the proposed reduction in electric Schedule 99 reflecting certain reductions related to Colstrip), and natural gas base rate relief of approximately \$4.6 million, or 3.2% (1.6% on a billed basis), effective December 21, 2025.

The Company’s request is based on a proposed rate of return of 7.61% with a common equity ratio of 48.5% and a 10.40% return on equity.

Avista requests that the Commission **immediately suspend the operation of the general tariff revisions** included in this filing, and promptly set the matter for hearing, including the

establishment of a prehearing conference, at the earliest possible date in accordance with WAC 480-07-440(1)(a).

The filed tariffs for each rate schedule provides for an effective date of February 21, 2024; however, in the Company’s filing in this case, Avista requests that the tariffs related to the 2024 rate request be suspended with an effective date of December 21, 2024, slightly more than eleven months after the date the Company files this case, and the Company consents to any waivers of the suspension period deemed necessary to accommodate this December 21, 2024 effective date. It is important to note that December 21, 2023 was the effective date for the Company’s Year 2 increase from the last Multiyear Rate Plan, and as such an effective date prior to December 21, 2024, resulting from this case, would cause a slight overlap of Rate Plans which is not what is contemplated in the law. The Company’s request here mitigates that potential overlap.

Please note that the Company has also simultaneously filed a Motion for a Protective Order Pursuant to WAC 480-07-420.

Service of documents pertaining to this filing should be to the following Avista Corporation representatives:

David J. Meyer, Esq.
 VP and Chief Counsel for
 Regulatory and Governmental Affairs
 Avista Corporation
 P. O. Box 3727
 1411 E. Mission Ave, MSC-10
 Spokane, WA 99220-3727
David.Meyer@avistacorp.com
 (509) 495-4316

Patrick Ehrbar
 Director of Regulatory Affairs
 Avista Corporation
 P. O. Box 3727
 1411 E. Mission Ave, MSC-27
 Spokane, WA 99220-3727
Patrick.Ehrbar@avistacorp.com
 (509) 495-8620

Avista Dockets (Electronic Only) - AvistaDockets@avistacorp.com

Provided with this filing are electronic copies of the following proposed tariff sheets, formatted with the coding required by WAC 480-80-105, and electronic copies in legislative format as required by WAC 480-07-510(2):

Rate Year 1 Electric		
19 th Revision Sheet 1	Canceling	18 th Revision Sheet 1
1 st Revision Sheet 7	Canceling	Original Sheet 7
1 st Revision Sheet 8	Canceling	Original Sheet 8
19 th Revision Sheet 11	Canceling	18 th Revision Sheet 11
4 th Revision Sheet 13	Canceling	3 rd Revision Sheet 13
2 nd Revision Sheet 17	Canceling	1 st Revision Sheet 17
2 nd Revision Sheet 18	Canceling	1 st Revision Sheet 18
19 th Revision Sheet 21	Canceling	18 th Revision Sheet 21
4 th Revision Sheet 23	Canceling	3 rd Revision 23

19 th Revision Sheet 25	Canceling	18 th Revision Sheet 25
15 th Revision Sheet 25A	Canceling	14 th Revision Sheet 25A
19 th Revision Sheet 31	Canceling	18 th Revision Sheet 31
18 th Revision Sheet 42	Canceling	17 th Revision Sheet 42
12 th Revision Sheet 42A	Canceling	11 th Revision Sheet 42A
4 th Revision Sheet 42B	Canceling	3 rd Revision Sheet 42B
18 th Revision Sheet 44	Canceling	17 th Revision Sheet 44
7 th Revision Sheet 44A	Canceling	6 th Revision Sheet 44A
19 th Revision Sheet 45	Canceling	18 th Revision Sheet 45
19 th Revision Sheet 46	Canceling	18 th Revision Sheet 46
5 th Revision Sheet 46A	Canceling	4 th Revision Sheet 46A
18 th Revision Sheet 47	Canceling	17 th Revision Sheet 47
19 th Revision Sheet 47A	Canceling	18 th Revision Sheet 47A
5 th Revision Sheet 47B	Canceling	Substitute 4 th Revision Sheet 47B
6 th Revision Sheet 75D	Canceling	Substitute 5 th Revision Sheet 75D
3 rd Revision Sheet 75E	Canceling	Substitute 2 nd Revision Sheet 75E
Rate Year 2 Electric		
20 th Revision Sheet 1	Canceling	19 th Revision Sheet 1
2 nd Revision Sheet 7	Canceling	1 st Revision Sheet 7
2 nd Revision Sheet 8	Canceling	1 st Revision Sheet 8
20 th Revision Sheet 11	Canceling	19 th Revision Sheet 11
5 th Revision Sheet 13	Canceling	4 th Revision Sheet 13
3 rd Revision Sheet 17	Canceling	2 nd Revision Sheet 17
3 rd Revision Sheet 18	Canceling	2 nd Revision Sheet 18
20 th Revision Sheet 21	Canceling	19 th Revision Sheet 21
5 th Revision Sheet 23	Canceling	4 th Revision Sheet 23
20 th Revision Sheet 25	Canceling	19 th Revision Sheet 25
16 th Revision Sheet 25A	Canceling	15 th Revision 25A
20 th Revision Sheet 31	Canceling	19 th Revision Sheet 31
19 th Revision Sheet 42	Canceling	18 th Revision Sheet 42
13 th Revision Sheet 42A	Canceling	12 th Revision Sheet 42A
19 th Revision Sheet 44	Canceling	18 th Revision Sheet 44
20 th Revision Sheet 45	Canceling	19 th Revision Sheet 45
20 th Revision Sheet 46	Canceling	19 th Revision Sheet 46
6 th Revision Sheet 46A	Canceling	5 th Revision Sheet 46A
19 th Revision Sheet 47	Canceling	18 th Revision Sheet 47
20 th Revision Sheet 47A	Canceling	19 th Revision Sheet 47A

Rate Year 1 Natural Gas		
20 th Revision Sheet 101	Canceling	19 th Revision Sheet 101
20 th Revision Sheet 111	Canceling	19 th Revision Sheet 111
20 th Revision Sheet 112	Canceling	19 th Revision Sheet 112
5 th Revision Sheet 116	Canceling	4 th Revision Sheet 116
20 th Revision Sheet 131	Canceling	19 th Revision Sheet 131
10 th Revision Sheet 131A	Canceling	9 th Revision Sheet 131A
20 th Revision Sheet 132	Canceling	19 th Revision Sheet 132
10 th Revision Sheet 132A	Canceling	9 th Revision Sheet 132A
20 th Revision Sheet 146	Canceling	19 th Revision Sheet 146
6 th Revision Sheet 175D	Canceling	Substitute 5 th Revision Sheet 175D
3 rd Revision Sheet 175E	Canceling	Substitute 2 nd Revision Sheet 175E
Rate Year 2 Natural Gas		
21 st Revision Sheet 101	Canceling	20 th Revision Sheet 101
21 st Revision Sheet 111	Canceling	20 th Revision Sheet 111
21 st Revision Sheet 112	Canceling	20 th Revision Sheet 112
6 th Revision Sheet 116	Canceling	5 th Revision Sheet 116
21 st Revision Sheet 131	Canceling	20 th Revision Sheet 131
11 th Revision Sheet 131A	Canceling	10 th Revision Sheet 131A
21 st Revision Sheet 132	Canceling	20 th Revision Sheet 132
11 th Revision Sheet 132A	Canceling	10 th Revision Sheet 132A
21 st Revision Sheet 146	Canceling	20 th Revision Sheet 146
Canceled Tariff Sheets		
17 th Revision Sheet 41		
6 th Revision Sheet 41A		

The Company has mailed, via overnight mail, 7 copies of its prepared direct testimony and exhibits for receipt on the same day as the Company's electronic filing. The Company will provide electronic copies of workpapers showing how test year data were adjusted to the parties within 5 business days of this filing, as required.

Pursuant to WAC 480-07-510 (5)(a), the Company has provided summary documents for both electric and natural gas service, individually for Rate Year 1, as well as for Rate Year 2.

WAC 480-07-510 (5)(b)(ii) which requires a letter stating that the Company's pre-filed testimony, exhibits, and work papers are available from the company on request, if the company is not serving them along with the summary document, is not relevant in this matter as we have served the parties to the proceeding, including the Public Counsel Unit of the Washington Attorney General's Office, with the pre-filed testimony and exhibits on the same day that the filing was made with the

Commission, and the workpapers as noted above will be provided to the parties within 5 business days of this filing, as required by WAC 480-07-510(4).

Pursuant to WAC 480-07-510, the Company has included hard copies of the following documents, with URLs also provided:

- A. Most recent Annual Report for 2022 filed in 2023 (10K) - <https://investor.avistacorp.com/static-files/536eb577-0eb6-4502-a885-ce58d678ad1f>
- B. Subsequent Quarterly Reports (10Q)
 - First Quarter 2023 - <https://investor.avistacorp.com/sec-filings/sec-filing/10-q/0000950170-23-016819>
 - Second Quarter 2023 - <https://investor.avistacorp.com/sec-filings/sec-filing/10-q/0000950170-23-036696>
 - Third Quarter 2023 - <https://investor.avistacorp.com/sec-filings/sec-filing/10-q/0000950170-23-057042>
- C. FERC Form 1 – <https://www.utc.wa.gov/sites/default/files/2023-06/NEW-AVA-2022-Form1-5-1-2023.pdf>
- D. FERC Form 2 - <https://www.utc.wa.gov/sites/default/files/2023-06/NEW-AVA-2022-Form2-5-1-2023.pdf>
- E. Annual and Quarterly Reports for 2022
 - Annual 10K - <https://investor.avistacorp.com/static-files/0f9b10de-962c-4c89-82f4-dc646818e42e>
 - First Quarter 10Q - <https://investor.avistacorp.com/sec-filings/sec-filing/10-q/0000950170-22-007151>
 - Second Quarter 10Q - <https://investor.avistacorp.com/sec-filings/sec-filing/10-q/0000950170-22-013978>
 - Third Quarter 10Q - <https://investor.avistacorp.com/sec-filings/sec-filing/10-q/0000950170-22-020658>
- F. Annual and Quarterly Reports for 2021
 - Annual 10K - <https://investor.avistacorp.com/static-files/c0741d7a-4efb-48a4-90c9-fa7ef63ade34>
 - First Quarter 10Q - <https://investor.avistacorp.com/sec-filings/sec-filing/10-q/0001564590-21-023551>
 - Second Quarter 10Q - <https://investor.avistacorp.com/sec-filings/sec-filing/10-q/0000950170-21-000739>
 - Third Quarter 10Q - <https://investor.avistacorp.com/sec-filings/sec-filing/10-q/0000950170-21-002708>
- G. Prospectuses for any issuances of securities – provided in hard copy form with this filing.

Please note that certain sections of the exhibits of Kevin J. Christie, Scott J. Kinney, Elizabeth M. Andrews, and Clint G. Kalich contain CONFIDENTIAL information. Please also note that Exh. SJK-2, SJK-2a, SJK-7, and SJK-7a, which are copies of the Company’s electric and natural gas Integrated Resource Plans and Appendices, are only being provided electronically due to their voluminous nature.

Also included in the filing are Ms. Schultz's native electric and natural gas Pro Forma Studies Exh. KJS-2 (electric) and Exh. KJS-3 (natural gas), providing linked, supporting information for all restating, pro forma and provisional adjustments and filed revenue requirements.

Additionally, as required by WAC 480-07-160(4)(a), the Company is also submitting an Attorney's Claim of Confidentiality regarding the submission of the unredacted versions of the above-referenced CONFIDENTIAL exhibits and workpapers. These documents should be treated as CONFIDENTIAL per WAC 480-07-160.

In compliance with WAC 480-90-197 and WAC 480-100-197, the Company will provide public notice once the public hearing dates have been selected by the Commission. In compliance with WAC 480-90-193(1) and WAC 480-100-193(1), the Company will post the proposed changes to its tariffs for public inspection and review on its website and will provide access via request by telephone or mail. A service list is attached, with the parties on the service list receiving a complete copy of the pre-filed testimony and exhibits.

In compliance with WAC 480-07-510(3)(g), the Company states that there are no additional material affiliated transactions to report impacting the test year that otherwise were not already reported in the Company's annual "2022 Affiliated Interest and Subsidiary Transaction Report". The Company's 2022 annual reports were filed on April 28, 2023 (See Dockets UE-230303 and UG-230304).

Finally, as a courtesy the Company has provided as Attachment A to this cover letter a spreadsheet which provides Commission Staff's "Audit Guide – Initial Filing Assessment For Electric And Natural Gas Companies" requirements, and Avista's explanation of how or where the requirements were met.

Additional copies of this filing, supporting testimony and exhibits are available from the Company upon request. Questions regarding this filing should be directed to Liz Andrews at (509) 495-8601 or liz.andrews@avistacorp.com.

Sincerely,

/s/ David J. Meyer

David Meyer
Vice President and Chief Counsel
for Regulatory and Governmental Affairs

Enclosures

cc: Service List