

**Avista Corp.**

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September 16, 2022

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

**RE: UG-220476 –Avista Utilities Amendment to Petition**

Dear Ms. Maxwell:

On June 28, 2022, Avista Corporation, dba Avista Utilities (Avista or the Company), filed with the Washington Utilities and Transportation Commission (Commission) its “Petition For an Order Authorizing Temporary Exemption of WAC 480-90-343, WAC 480-90-348 and Associated Company Tariffs” (Petition), in accordance with WAC 480-90-008 and WACs 480-07-110 and 370(3). This request was made so that Avista may provisionally pause its current natural gas meter testing procedures, or Periodic Meter Changeout (PMC) Program, due to ongoing meter supply issues, as described within the Petition.

After subsequent investigation and discussions with Commission Staff, the Company recognizes that its original Petition lacked specificity regarding which rules and tariff sections the Company was actually seeking exception from. As such, to provide for a cleaner record in this Docket, Avista is hereby revising its petition to provide further clarification and specificity regarding the provisions from which it is seeking relief. Namely, the Company is narrowing its citations of WAC 480-90-348 and its natural gas tariff Schedule 170, “Rules and Regulations”, to more precise sections, and excluding, in its entirety, the original request for exemption from 480-09-178(5)(a). Since the time of Avista’s filing, Staff and the Company have determined that this portion of the request is no longer warranted, as the Company’s request to appropriately refund

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customers for any potential overbilling due to a provisional pause in the PMC Program can be accomplished within the existing rule.

Avista has also been advised that, in addition to the revised Petition, the Company must also submit revised tariff pages that effectively remove the language from which it is seeking exemption in WN U-29, Schedule 170. In support of such guidance, Avista requests modifications to the following natural gas tariff sheets, WN U-29:

**First Revision Sheet 170-U      Canceling      Original Sheet 170-U**

The language to be deleted during the time in which the PMC Program is temporarily paused (WN U-29, Schedule 170, paragraph 24.C.b.iii.1) states:

For diaphragm meters 1000 CFH and smaller, a random sample of meters shall be selected, tested within a prescribed sample size, and analysis conducted using Standard Z1.9. The random sampling program shall begin during the 10th year after meter installation, as established by last set date.

Due to the timing of submitting these tariff revisions (since they were not submitted with the Company's original filing in June 2022), and to align the tariffs with the potential approval of the Petition, Avista is requesting that these revisions be approved with Less than Statutory Notice (LSN) pursuant to WAC 480-80-122—with an effective date of September 30, 2022. As required by WAC 480-80-122(2), the tariff sheet provided is reflective of the required statutory notice period and will be revised to reflect the requested LSN effective date if approved by the Commission. This language will then be added back into the Company's tariff once the PMC Program has resumed. For the reasons listed above, and for those listed within Avista's Petition regarding why this request is in the public interest, the Company believes that LSN is appropriate for the tariff changes requested herein.

If you have any questions regarding this filing, please contact me at (509) 495-2782 or [shawn.bonfield@avistacorp.com](mailto:shawn.bonfield@avistacorp.com).

Sincerely,

*/s/ Shawn Bonfield*

Shawn Bonfield  
Sr. Manager of Regulatory Policy & Strategy

CC : Public Counsel