

J. B. Rivard & Anya Carlson
 2301 N. Crestline Street
 Spokane, Washington 99207

March 12, 2018

Washington UTC
 P.O. Box 47250
 Olympia WA 98504-7250

RE: Hydro One-Avista Merger, Docket UE-170970

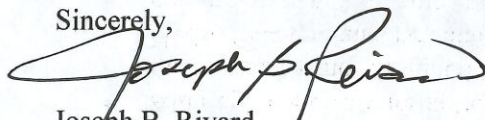
Dear Commissioners:

Washington law requires the merger of Hydro One and Avista to produce concrete benefits for customers. As customers of Avista (Account No. 2213470000) we ask Washington Utilities Commissioners to oppose this merger for the following reasons:

- The merger will create a large, multinational business dominated by the Canadian company, Hydro One. Hydro One's 5 to 4 vote on the Board of Directors means utility policy for customers of Avista will be dominated by this foreign company, an entity beyond the reach of United States and Washington law.
- The customer notice issued to Avista customers dated February-March 2018 provides soothing phrases about the merger being "a good corporate citizen and community partner," providing "safe, reliable and affordable service." Such platitudes are empty of specifics. They provide no assurance whatsoever of "concrete benefits for customers."
- The merged company will be a Canadian for-profit company. Taxes on profits derived from United States customers like us will flow to Canada. This is in complete opposition to Washington law that requires concrete benefits for Washington customers of Avista.
- Although the customer notice for Avista Customers dated February-March 2018 claims the merger "is not designed to target the elimination of jobs," policy domination by Hydro One contains no such restriction. Avista employees in the United States are, as is common when companies merge, at risk of loss of employment.
- Avista's customer notice dated February-March 2018 says "Immediate cost savings" arising from the merger "will be passed on to customers." Because the term "immediate cost savings" is vague and undefined, it cannot legitimately constitute "concrete benefits for customers" as required by Washington law.
- Avista's customer notice dated February-March 2018 claims "Avista communities will see increased charitable contributions" as a result of the merger. This promise is vague and lacks enforceability. As such, it cannot be considered to "produce concrete benefits for customers" as required by Washington law.

For at least the above six reasons, the merger of Hydro One and Avista (Docket UE-170970) should be opposed by the Washington Utilities and Transportation Commission.

Sincerely,


 Joseph B. Rivard


 Anya Carlson

RECEIVED
 RECORDS MANAGEMENT
 2018 MAR 19 AM 7:20
 STATE OF WASH
 UTIL. AND TRANS
 COMMISSION

J.B. Rivard
1452 S. Ellsworth Rd.#3017
Mesa AZ 85209

PHOENIX AZ 852
13 MAR 2018 PM 8 L



Washington UTC
P.O. Box 47250
Olympia WA 98504-7250

98504-7250

