



**Avista Corp.**

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November 15, 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: Docket No. UE-171091 - Avista Utilities 2019 Electric Annual Conservation Plan (ACP)  
and Tariff Revision Schedule 90

Dear Mr. Johnson,

In compliance with RCW 19.285, WAC 480-109-120(2), and requirements outlined in Commission Order No. 01 in Docket No. UE-171091 approving Avista's 2018-2019 Biennial Conservation Plan with conditions, Avista Corporation, dba Avista Utilities ("Avista or "the Company"), respectfully submits its "2019 Electric Annual Conservation Plan (ACP)". Also included in this filing are proposed revisions to the Company's associated electric tariff Schedule 90 – Electric Energy Efficiency Programs – to incorporate resultant provisions into the tariff and provide several housekeeping updates.

A draft copy of the 2019 Electric ACP was provided to Avista's Energy Efficiency Advisory Group (Advisory Group) on October 15, 2018. The Company received input from the Commission Staff, Public Counsel, and the Northwest Power and Conservation Council and have incorporated the input into its filing.

Avista's Electric ACP represents program efforts by the Company in order to acquire electric energy efficiency savings for residential, commercial and industrial customers in the upcoming 2019 program year. For the 2019 ACP, the Company has identified planned conservation savings, excluding the Company's fuel conversion programs, of 49,108 MWh from

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local efforts and a total of 54,101 MWh after including regionally acquired savings from the Northwest Energy Efficiency Alliance (NEEA). The Company has provided in its plan the annual estimated savings and budgets for each of its electric Energy Efficiency programs. Please see Appendix F for the annual program summary outlining Avista’s planned savings by sector.

The 2019 Electric ACP includes several appendices:

- Appendix A: 2019 Program Plans*
- Appendix B: 2019 Evaluation, Measurement and Verification Plan*
- Appendix C: Summarization of Cost-Effectiveness Methodology*
- Appendix D: Quick Reference Guide*
- Appendix E: Schedule 90, Washington*
- Appendix F: Program Summary*
- Appendix G: Impact Evaluation Recommendations*

Also attached for filing with the Commission, and included as Appendix E to the Company’s ACP, are Avista’s proposed revisions to the following tariff sheets, WN U-28:

<b>Seventh Revision Sheet 90A</b>	Canceling	<b>Sixth Revision Sheet 90A</b>
<b>Fifth Revision Sheet 90B</b>	Canceling	<b>Fourth Revision Sheet 90B</b>

The Company also requests, for housekeeping purposes, cancellation of the following tariff sheets, WN U-28:

**Second Revision Sheet 90D**  
**Second Revision Sheet 90E**  
**Third Revision Sheet 90F**  
**Original Sheet 90G**  
**Original Sheet 90H**  
**Original Sheet 90I**  
**Original Sheet 90J**  
**Original Sheet 90K**  
**Original Sheet 90L**  
**Original Sheet 90M**  
**Original Sheet 90N**  
**Original Sheet 90O**

These requested tariff revisions include updates to incorporate the following changes:

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 90A, to add provisions regarding how

measures with a TRC of less than 1 are incentivized for the low income sector, and to replace references of “DSM” with “Energy Efficiency” 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 \$0.20/kWh 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 10.
3. For housekeeping purposes, Avista requests cancellation of tariff sheets 90D-90O, 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 90, 90A, 90B, or 90C during that time.

If you have any questions regarding this information, please contact Dan Johnson, Director of Energy Efficiency at 509-495-2807 or myself at 509-495-4975.

Sincerely,

*/s/Linda Gervais/*

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cc : Avista’s Energy Efficiency Advisory Group

Enclosures