



**Avista Corp.**

1411 East Mission P.O. Box 3727  
Spokane, Washington 99220-0500  
Telephone 509-489-0500  
Toll Free 800-727-9170

May 26, 2021

Mark L. Johnson, Executive Director and Secretary  
Washington Utilities & Transportation Commission  
621 Woodland Square Loop SE  
Lacey, Washington 98503

RE: UE-190445 – Avista’s Request for Final 2019 RPS Compliance Determination

Dear Mr. Johnson:

Avista Corporation, dba Avista Utilities or (Avista and/or the Company), respectfully requests a final determination of compliance for its 2019 Renewable Portfolio Standard (RPS) “Compliance Report.”

On May 30, 2019, in compliance with RCW 19.285, (Initiative 937 (I-937) or the Washington Energy Independence Act), the Company submitted its 2019 Renewable Portfolio Standard Compliance Report demonstrating its compliance with the renewable energy component of I-937.

In the RPS Report, Avista reported that, as of January 1, 2019, it had 514,144 megawatt-hours of incremental electricity from hydroelectric upgrades, qualified biomass and wind generation available for its use in 2019 net of Renewable Energy Certificate (REC) sales when the report was submitted. All of the hydroelectric facilities listed in the Company’s RPS Report are located in the Pacific Northwest, and all are owned by a qualifying utility. All of the hydroelectric efficiency improvements listed in Avista’s RPS report were completed after March 31, 1999. Avista has demonstrated that, as of January 1, 2019, it had the right to use 514,144 megawatt-hours of eligible renewable resources, as defined in RCW 19.285.030(12)(a), RCW 19.285.030(12)(b), RCW 19.285.030(3) and RCW 19.285.030(12)(d) in 2016.

On August 8, 2019, in Order No. 01, in Docket No. UE-190445 the Commission provided the following:

- (1) The Commission accepts the calculation of 514,144 megawatt-hours as the 2019 renewable energy target for Avista Corporation.

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- (2) Avista Corporation has identified eligible renewable resources sufficient to supply at least 9 percent of its load for 2019.
- (3) Avista Corporation has complied with the June 1, 2019, reporting requirements pursuant to WAC 480-109-210.
- (4) Avista Corporation’s final compliance report must list certificate numbers for every renewable energy credit that Avista Corporation retired in the Western Renewable Energy Generation Information System and details about which certificates were used for its voluntary renewable programs in 2019.
- (5) The Commission Secretary is authorized to accept or approve a filing that complies with the requirements of this Order.

Per the Commission Order, the Company now seeks a final compliance determination regarding its 2019 compliance. As described in the Company’s RPS report, it has met its 2019 target using qualified hydroelectric upgrades, eligible biomass, and wind resources.

The qualifying generation associated with the hydroelectric upgrades, qualified biomass, and wind generation used for 2019 compliance are permanently retired in WREGIS and are described in the following table:

#### **Renewable Energy for Avista’s 2019 Compliance**

<b>WREGIS Generation Unit ID</b>	<b>Generator Plant – Unit Name</b>	<b>Vintage</b>	<b>Certificate Serial Numbers</b>	<b>Total Number Eligible Renewable Resources (MWh)</b>
W1560	Cabinet Gorge Unit 2	2019	1560-ID-339645-1 to 12184	12,184
W1561	Cabinet Gorge Unit 3	2019	1561-ID-339646-1 to 13690	13,690
W1562	Cabinet Gorge Unit 4	2019	1562-ID-335841-1 to 6137	6,137
W2103	Long Lake Unit 3	2019	2103-WA-328291-1 to 7241	7,241
W216	Nine Mile Unit 1	2019	216-WA-329757-2779 to 3365	587
W216	Nine Mile Unit 1	2019	216-WA-325133-1 to 6021	6,021
W283	Nine Mile Unit 2	2019	283-WA-325139-209 to 2038	1,830
W1530	Noxon Rapids Unit 1	2019	1530-MT—333318-1 to 138	138
W1530	Noxon Rapids Unit 1	2019	1530-MT-392854-1 to 21297	21,297
W1552	Noxon Rapids Unit 2	2019	1552-MT-329846-1 to 7709	7,709
W1554	Noxon Rapids Unit 3	2019	1554-MT-329497-1 to 14529	14,529
W1555	Noxon Rapids Unit 4	2019	1555-MT-329847-11783 to 23680	11,898
W797	Kettle Falls	2018	797-WA-297416-1 to 1038	1,038
W2906	Palouse Wind	2018	2906-WA-320278-16302 to 30146	13,845
W797	Kettle Falls	2018	797-WA-278004-1 to 4356	4,356

W797	Kettle Falls	2018	797-WA-285782-384 to 1593	1,210
W2906	Palouse Wind	2019	2906-WA-336122-1 to 20583	20,583
W130	Kettle Falls	2018	130-WA-284098-15585 to 22585	7,001
W797	Kettle Falls	2019	797-WA-281890-1 to 1136	1,136
W797	Kettle Falls	2018	797-WA-285782-1594 to 4282	2,689
W130	Kettle Falls	2018	130-WA-291768-3283 to 23112	19,830
W130	Kettle Falls	2018	130-WA-303687-21635 to 29371	7,737
W797	Kettle Falls	2018	797-WA-309164-818 to 4092	3,275
W130	Kettle Falls	2018	130-WA-319672-12689 to 29833	17,145
W2906	Palouse Wind	2019	2906-WA-328508-127 to 31211	31,085
W2906	Palouse Wind	2019	2906-WA-332784-1 to 27765	27,765
W130	Kettle Falls	2018	130-WA-280203-28253 to 30677	2,425
W2906	Palouse Wind	2018	2906-WA-280865-7062 to 39160	32,099
W797	Kettle Falls	2018	797-WA-281890-1137 to 3208	2,072
W130	Kettle Falls	2018	130-WA-287957-7280 to 30153	22,874
W797	Kettle Falls	2018	797-WA-285782-1 to 383	383
W797	Kettle Falls	2018	797-WA-289557-1 to 3282	3,282
W130	Kettle Falls	2018	130-WA-299650-1141 to 7305	6,165
W797	Kettle Falls	2018	797-WA-301308-1 to 4170	4,170
W797	Kettle Falls	2018	797-WA-305209-854 to 4422	3,569
W130	Kettle Falls	2018	130-WA-315812-25184 to 31486	6,303
W797	Kettle Falls	2018	797-WA-313480-1 to 4471	4,471
W797	Kettle Falls	2018	797-WA-317273-1 to 4237	4,237
W130	Kettle Falls	2018	130-WA-323683-5803 to 30612	24,810
W797	Kettle Falls	2018	797-WA-321134-305 to 4347	4,043
W2906	Palouse Wind	2019	2906-WA-339926-1 to 32999	32,999
W2906	Palouse Wind	2019	2906-WA-344016-1 to 26521	26,521
W2906	Palouse Wind	2019	2906-WA-348114-1 to 26425	26,425
W2906	Palouse Wind	2019	2906-WA-352402-834 to 3397	2,564
W2906	Palouse Wind	2018	20% Apprentice Credit (No WREGIS Certificate)	9,188
W2906	Palouse Wind	2019	20% Apprentice Credit (No WREGIS Certificate)	33,588
<b>Total Number of RECs and/or Qualifying Hydroelectric Upgrades</b>				<b>514,144</b>

The Company retired the qualifying hydroelectric upgrades, Kettle Falls biomass, and the Palouse Wind RECs listed above, and has included screen shots from WREGIS (190445-AVA-Attachment A and 190445-AVA-Attachment B) as proof of retirement for 514,144 MWh to the Commission. With the switch over from hydro Method 3 to hydro Method 1, some of the qualified hydro upgrades for 2019 that should have been retired for compliance in 2019 were sold and the difference was replaced with RECs from Kettle Falls. The affected hydro included 2,284 RECs from Noxon Rapids Unit 1, 7,783 RECs from Noxon Rapids Unit 2, and 11,010 RECs from Noxon Rapids Unit 3.

Attached as 190445-AVA-Attachment C is the REC certificate numbers and screen shots for the 63,623 MWh retired on behalf of Avista's voluntary My Clean Energy/Buck-A-Block program. The attestation for the 19 MWh from the Rathdrum Solar Project is included as 190445-AVA-

Attachment D, 42,346 MWh from Adams-Neilson Solar for the Solar Select program is outlined in 190445-AVA-Attachment E, and 557 MWh for the Boulder Park Community Solar program is included as 190445-AVA-Attachment F to this filing.

If you have any questions regarding this information, please contact John Lyons at 509-495-8515 or [john.lyons@avistacorp.com](mailto:john.lyons@avistacorp.com) or myself at 509-495-2782 or [shawn.bonfield@avistacorp.com](mailto:shawn.bonfield@avistacorp.com).

Sincerely,

*Shawn Bonfield*

Shawn Bonfield  
Sr. Manager of Regulatory Policy & Strategy  
Avista Utilities