

**BEFORE THE  
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

In the Matter of the Petition of )  
Avista Corporation, d/b/a Avista Utilities ) Docket No. UE-19-\_\_\_\_\_  
For an Order Authorizing Approval of an Extension to )  
File its 2019 Electric Integrated Resource Plan, and ) PETITION OF AVISTA  
Use of its 2017 Integrated Resource Plan for purposes ) CORPORATION  
of its 2020-2021 Biennial Conservation Plan Targets )

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**I. INTRODUCTION**

1 Avista Corporation, doing business as Avista Utilities ("Avista" or "Company"), at 1411 East Mission Avenue, Spokane, Washington, respectfully petitions the Washington Utilities and Transportation Commission (Commission) to issue an order authorizing a six-month extension of time for filing its 2019 Electric Integrated Resource Plan (IRP).

2 Please direct all correspondence related to this Petition as follows:

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## **II. BACKGROUND**

3           The Company submits the IRP to the Commission every two years as outlined in WAC  
480-100-238. Avista's next IRP is due to be filed with the Commission on or before August 31,  
2019. The IRP is a methodology for identifying and evaluating various resource options and is  
a process by which to establish a plan of action for resource decisions. Avista uses AURORA<sub>xmp</sub>  
for electric market price forecasting, resource valuation and for conducting Monte-Carlo style  
risk analyses of the electric market place. This system fills future capacity and energy  
(physical/renewable) deficits using an efficient frontier approach to evaluate quantitative  
portfolio risk versus portfolio cost while accounting for environmental laws and regulations.

4           Avista uses a public process to solicit technical expertise and feedback throughout the  
development of the IRP through a series of Technical Advisory Committee (TAC) meetings.

5           For the reasons stated herein, Avista requests a six-month extension to submit the  
Company's 2019 Electric IRP to provide enough time for the conclusion of various state  
legislative sessions so that Avista can integrate any changed regulations that may impact its IRP  
modeling and assumptions.

## **III. SUPPORT FOR EXTENSION**

6           There are currently numerous legislative proposals in the States of Washington, Montana,  
and Oregon that will have major impacts on the regional electric market most-notably,  
Washington's Senate Bill 5116, "100% Clean Energy" bill. Washington's Senate Bill 5116  
will, if adopted, require the elimination of coal as a source of generation serving Washington  
customers by 2025, 80% carbon-free energy by 2030 and 100% carbon free energy serving

Washington customers by 2045. In addition to Senate Bill 5116, House Bill 1113, would, if approved, increase the Washington State greenhouse gas targets to meet the Paris Climate Accord goals. House Bill 1110 may impact our industry through increased electrification of transportation, which could also impact the regional electric market. A comprehensive cap and trade proposal is also expected to be introduced in Washington soon.

7 Potential legislation in Montana and Oregon could also impact the regional electric market. Montana House Bill 203 – the Montana Energy Security Act - could allow Montana to issue half a billion dollars of bonds to buy Colstrip. Energy-related bills in Oregon (Cap and Trade) may impact Avista’s Coyote Springs 2 Generating Facility.

8 With all of these legislative uncertainties, IRP modeling at this time would be premature. The impact of such legislation could fundamentally change the regional (and Avista’s) resource mix, and therefore have an impact on Avista’s customers. Thus, to the extent any of the potential legislation is enacted, new models would need to be run to account for the actual impact of such legislation.

#### **IV. 2019-2020 BIENNIAL CONSERVATION PLAN**

9 In compliance with RCW 19.285 and WAC 480-109-120, Avista is to submit its “2020-2021 Biennial Conservation Plan (BCP)” on or before November 1, 2019. The BCP outlines the Company’s approach to acquiring electric energy efficiency savings which is derived using its most recently completed Conservation Potential Assessment (CPA). Since the IRP modeling, including the CPA modeling, will not be completed by November 2019, under the Company’s proposal to delay its 2019 IRP (as discussed above), the Company plans to use its 2017 IRP for compliance with its 2020-2021 BCP targets to be filed on or before November 1, 2019. Avista

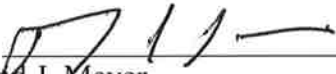
believes the targets would not be dramatically different than the current pro rata share in its 2018-2019 BCP.

**V. CONCLUSION**

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WHEREFORE, Avista respectfully requests the Commission issue its Order approving a six-month extension of the Company's 2019 Electric IRP as explained in this Petition and the use of its 2017 IRP for purposes of setting the energy efficiency target for its 2020-2021 Biennial Conservation Plan.

DATED this 29th day of January 2019

By:   
David J. Meyer  
Vice President and Chief Counsel for  
Regulatory and Governmental Affairs

VERIFICATION

STATE OF WASHINGTON )  
 )  
County of Spokane )

David J. Meyer, being first duly sworn on oath, deposes and says: That he is a Vice President of Avista Corporation and makes this verification for and on behalf of said corporation, being thereto duly authorized;

That he has read the foregoing Petition, knows the contents thereof, and believes the same to be true.



SIGNED AND SWORN to before me on this 29<sup>th</sup> day of January 2019





NOTARY PUBLIC in and for the State of Washington, residing at Spokane.

Commission Expires: 11/23/2021