

**BEFORE THE
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

In the Matter of the Petition of)
Avista Corporation, d/b/a Avista Utilities) Docket No. UG-20-_____
For an Order Authorizing Approval of an Extension to)
File its Natural Gas Integrated Resource Plan) PETITION OF AVISTA
CORPORATION)
_____)

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 an extension from August 31, 2020 to April 1, 2021 to submit the Company's Natural Gas Integrated Resource Plan (IRP).

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

David Meyer
Vice President and Chief Counsel for
Regulatory & Governmental Affairs
Avista Corp.
P. O. Box 3727
1411 E. Mission Avenue, MSC XX
Spokane, Washington 99220-3727
Telephone: (509) 495-4316
E-mail: david.meyer@avistacorp.com

Linda Gervais
Senior Manager of Regulatory Policy
Regulatory Affairs
Avista Corp.
P. O. Box 3727
1411 E. Mission Avenue, MSC 27
Spokane, Washington 99220-3727
Telephone: (509) 495-4975
E-mail: linda.gervais@avistacorp.com

II. BACKGROUND

3 The Company submits the IRP to the Commission every two years as outlined in WAC
480-90-238. Avista's next IRP is due to be filed with the Commission on or before August 31,
2020. 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 SENDOUT®
(a PC based programming model widely used to solve natural gas supply and transportation
optimization questions) for peak day demand, resource valuation and for conducting Monte-
Carlo style risk analyses. SENDOUT® modeling results are used to select the Preferred
Resource Strategy (PRS).

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 seven-month extension from August 31,
2020 to April 1, 2021 to submit the Company's Natural Gas 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 and Oregon
that will have major impacts on natural gas planning, including Washington's Senate Clean
Energy Transformation Act (CETA) or Senate Bill 5116, Washington House Bills 1257 and
1444, and Oregon Senate Bill 98. Final rules and expectations for natural gas distribution
utilities with respect to each of these bills are expected to take several more months to create
and implement, which will affect the ability to fully realize the impacts to the IRP process.

7 CETA requires 100% carbon free electricity serving Washington customers by 2045 and references renewable natural gas investments for distribution or consumption. Washington House Bills 1257 and 1444 call for new energy efficiency requirements with new requirements for buildings and appliance standards and will affect Avista’s conservation potential assessment (CPA) going forward, taking effect by 2022. A set of renewable natural gas and fuels bills, including Oregon SB 98, and Washington HB 1257, open up a path forward to acquire these supply side resources as a means to reduce carbon emissions.

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. Further, recall that in almost every scenario provided in the Company’s 2018 IRP, Avista did not have transportation resource needs in the 20 year planning horizon.

9 Avista is currently assessing the alignment of portions of its electric and natural gas IRPs to reduce redundancy in analytics and economic assumptions. The newly requested filing date for the natural gas IRP is April 1, 2021. In Avista’s 2018 Natural Gas IRP the expected case displayed no resource shortages.

IV. CONCLUSION

10 WHEREFORE, Avista respectfully requests the Commission issue its Order approving a six-month extension from August 31, 2020 to April 1, 2021 to submit the Company's Natural Gas Integrated Resource Plan as explained in this Petition.

DATED this 15th day of January 2020

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