



Avista Corp.

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March 5, 2020

VIA – UTC Web-Portal

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

Dear Mr. Johnson,

Attached for filing with the Commission is an electronic copy of Avista Corporation's, dba Avista Utilities ("Avista" or "the Company"), proposed modifications to Tariff Schedule 180 "Meter Reading and Billing Practices." The proposed additions are included in the following tariff sheets, WN U-29:

First Revision Sheet 180a	Canceling	Substitute Original Sheet 180a
First Revision Sheet 180b	Canceling	Substitute Original Sheet 180b
	Delete	First Revision Sheet 180c

I. BACKGROUND

On January 6, 2020, the Company filed with the Washington Utilities and Transportation Commission (Commission) revisions to both electric Tariff Schedule 80 and natural gas Tariff Schedule 180. The purpose of the electric and natural gas filings was to address the low monthly fee, and propose an increase so as to send a more proper price signal to customers as Avista completes the rollout of AMI.

II. PROPOSED OPT OUT FEE CHANGE

In discussions with the Commission Staff and the Energy Project, the Company has agreed to reduce its proposed opt-out fee filed on January 6, 2020 from \$15.00 to \$10.00. To date, approximately 1,518 customers have elected to Opt-Out of receiving an advanced meter.

As provided in the Company's January filing, given the volume of current and forecasted opt-out customers within the Washington service territory, Avista anticipates additional costs will be incurred to provide the necessary quality of service due to an increase in required network devices.¹

Avista believes that the monthly meter reading charge should be changed in order to send a better price signal to customers. Customers that choose a non-communicating meter will have their meter(s) read by the Company on a quarterly basis, and the one-time fees associated with opt-out would not change. Below are the proposed monthly metering reading fees:

Table No. 1 – Ongoing Monthly Meter Reading Charge

Electric Meter(s) Read Only	Both Electric and Natural Gas Meter(s) Read	Natural Gas Meter(s) Read
\$10	\$10	\$10

Avista's proposed \$10.00 monthly meter reading charge is still below the estimated meter reading cost as shown in its January filing. Even though the charge is well below cost based, we believe it will send a more accurate price signal to those customers who have not yet decided whether or not they may opt out. Even more importantly, now is the time to adjust the rate, in light of the fact that Avista has not yet charged the vast majority of its opt-out customers this rate.²

In its January filing, the Company requested to remove the waiver for its limited income customers and allow for additional rate assistance to be applied to cover the opt-out fee. Since the

¹ See Advice Letter dated January 6, 2020 in Docket No. UE-200013.

² Avista has gradually reduced its meter reading staff by replacing permanent staff with temporary meter readers, with the intent to disband its meter reading staff entirely when AMI deployment is complete. Given the limited amount of customer's currently being charged an opt-out fee, Avista proposes to postpone charging the opt-out fee because meter reading will still occur during the transition phase.

filing in January and given that there are only 126 customers who qualify as low-income who have returned an opt-out application, the Company proposes to keep the following language in its tariff:

Customers who have qualified for energy assistance in the 12 months prior to the estimated installation date of a communicating meter, but who request a non-communicating meter, will not be subject to the “Ongoing Monthly Meter Reading Charge”, but will be subject to the conditions detailed under “One-Time Fee.”

III. CUSTOMER COMMUNICATIONS

Per WAC 480-90-194 (3), Avista will send a notice, provided as Attachment B of the proposed tariff to each customer who has requested and/or completed an application to not receive a smart meter. Also, the following Community Action Agencies will be provided the same notice:

Spokane Neighborhood Action Partners (SNAP) - Spokane County
Rural Resources - Stevens, Ferry and Lincoln Counties
Opportunities Industrialization Center - Grant and Adams Counties
Community Action Partnership - Asotin County
Community Action Center - Whitman County
Washington Gorge Action Programs - Klickitat and Skamania Counties

Avista will continue its practice of responding directly to every customer who raises a concern with advanced metering. We have found this direct approach of providing accurate, understandable, and balanced information to be very helpful and effective to our customers. Once a customer contacts us we will direct them to the Company’s website, or mail them the attached Application Form, they can then return the signed form to Avista in order to process the meter request.

IV. CONCLUSION

Given the feedback and interest from the Commission Staff, the Energy Project and other interested parties regarding this filing, Avista requests that the Commission approve the proposed policy changes as explained in its January 6, 2020 filing, as well as the modifications related to the fee and low income as explained above moving the effective date of April 11, to April 13, 2020. The revised “Non-Communicating Meter” application is also included as Attachment A. The Company continues to access all aspects of its AMI opt out program and its unanticipated issues and commits to continued status reports to the Commission. Please direct any questions regarding this filing to me at 509-495-4975.

Sincerely,

/s/Linda Gervais

Sr. Manager, Regulatory Policy & Strategy
Regulatory Affairs
linda.gervais@avistacorp.com

AVISTA CORPORATION
dba Avista Utilities

SCHEDULE 180A - CONTINUED
Advanced Metering Infrastructure (AMI) Opt-Out - Pilot

(T)

AVAILABILITY:

1. The services described herein are available to single-family residential homes, including multi-plexes up to four units, for the purpose of a customer's choice to have a non-communicating meter. AMI meters, sometimes referred to as "smart meters," are digital meters equipped with wireless communication capabilities. Customers that request to have a non-communicating meter must meet the requirements and responsibilities for service outlined in this tariff schedule. Customers who net meter are not eligible for a non-communicating meter.

(T)

TERMS AND CONDITIONS:

1. The Company shall not initiate the process to provide non-communicating meter service before it has received the Customer's signed, written request in the Application Form on file with the Commission.
2. Customer will be required to pay the ongoing administrative and operational costs associated with the manual reading of the non-communicating meter, and other fees and charges associated with the non-communicating metering service that may be assessed for each eligible meter, as noted in the Fees Section of this tariff.
3. Customer may be required to pay a One-Time fee if they call in after installation of the new AMI meter requesting a non-communicating meter. This fee is to cover the costs of the labor and transportation associated with the installation. The One-Time Fee is noted in the Fees Section of this tariff.
4. Customer account with a non-communicating meter will be billed monthly based upon estimated monthly reads.
5. The Company is under no obligation to physically read the meter more frequently than once a quarter.
6. The Company may refuse or revoke the installation of a non-communicating meter at the Customer's premises for the following conditions, but not limited to:
 - a. when safe access is not available for the Company's personnel and standard equipment;
 - b. current or past incidents of Customer meter tampering; or
 - c. current or past incidents of the Customer impeding the Company's access to the meter to obtain meter reads, perform maintenance or to disconnect meter for non-payment of electric service.

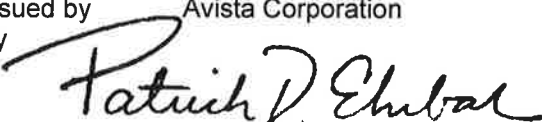
(C)

Issued March 5, 2020

Effective April 13, 2020

Issued by Avista Corporation

By



Patrick Ehrbar, Director of Regulatory Affairs

AVISTA CORPORATION
dba Avista Utilities

SCHEDULE 180B - CONTINUED
Advanced Metering Infrastructure (AMI) Opt-Out - Pilot

(T)

FEES:

One-Time Fee

Customers who request to opt-out from installation of an AMI meter before one is installed and within 30 days of its initial installation will not be charged. When a customer requests a non-communicating meter more than 30 days after an AMI meter has been installed, that customer will be charged as described below:

(T)

Opt-Out Following Installation of an AMI Meter	Natural Gas Meter Only	Both Natural Gas and Electric Meter
Within 30 days	\$0.00	\$0.00
After 30 days	\$75.00	\$75.00

Ongoing Monthly Meter Reading Charge

(D)

Meter Readings - Customers that choose a non-communicating meter will have their meter(s) read by the Company on a quarterly basis. The non-manual meter read billing cycles will be estimated by the Company. The monthly charge for this service is as set forth below:

(D)

Natural Gas Meter(s) Read Only	Both Natural Gas and Electric Meter(s) Read	Electric Meter(s) Read Only
\$10.00	\$10.00	\$10.00

(N)(R)

Customers who have qualified for energy assistance in the 12 months prior to the estimated installation date of a communicating meter, but who request a non-communicating meter, will not be subject to the "Ongoing Monthly Meter Reading Charge", but will be subject to the conditions detailed under "One-Time Fee".

All monthly meter reading charges will be subject to the Company's Rules and Regulations under Tariff Schedule 170. There will be no charge for customers choosing to remove a non-communicating meter and install an AMI meter.

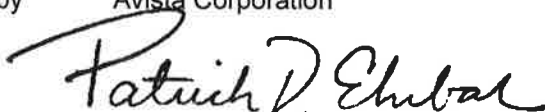
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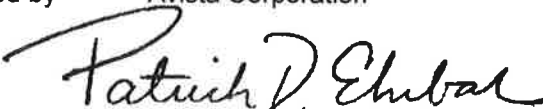
SCHEDULE 180C - CONTINUED
Advanced Metering Infrastructure (AMI) Non-Communicating Digital Meter - Pilot

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Issued March 5, 2020

Effective April 13, 2020

Issued by Avista Corporation
By



Patrick Ehrbar, Director of Regulatory Affairs

Non-Communicating Meter Application

Account Number: _____ Date: _____

Customer Name on Account: _____

Email: _____ Phone: _____

Service Address: _____

Property Owner Signature (if different than Customer: _____

Property Owner Phone Number: _____

Request to keep existing meter: _____

Reason for Request: _____

Signed: _____ Date: _____

For your convenience, there are multiple ways to submit this Application to us:

- Scan or take a photo of it and email it to optout@avistacorp.com
- Mail it to Avista at 1411 E. Mission, Attn: Opt Out, Spokane, WA 99202
- FAX it to Avista at 509-777-9650

Please contact us at 1-800-227-9187 or visit www.myavista.com/smartmeters for more information.

Terms and Conditions

All services provided in connection with Avista's Non-Communicating Meter Program shall be provided in accordance with the terms and conditions of Avista's Tariff Schedules 80A-80C, as amended from time to time and as approved by the Washington Utilities and Transportation Commission. A copy of Tariff Schedules 80A-80B are available at <https://www.myavista.com/about-us/our-rates-and-tariffs/washington-electric>, or may be provided in hardcopy, by e-mail or U.S. mail, upon request. By signing above, Customer recognizes and agrees that their participation in Avista's Non-Communicating Meter Program is subject to said terms and conditions.

[Insert Date]

DRAFT

Dear (Customer Name),

As an Avista customer participating in the Smart Meter Opt-Out Program, we want to inform you of an update to the proposal we filed earlier this year with the Washington Utilities and Transportation Commission (Commission) that would change elements of the program if approved.

On March 3, 2020, we filed an updated tariff revision that changes the previously proposed monthly program fee. The proposed update is the result of ongoing discussions through the regulatory process. It supports efforts to better align the program with the actual costs to serve opt out customers.

Changes in updated proposal

If the Commission approves the update to our proposal, customers who choose to opt out would be charged a \$10 monthly fee. This new fee would be effective April 13, 2020, and would apply to customers after they have completed the full opt out process.

Customers who have qualified for energy assistance in the 12 months prior to the estimated installation of a smart meter who choose to opt out will not be charged the monthly fee, but will be charged the one-time fee of \$75. This is a continuation of the current policy.

Opt out customers' meters will continue to be manually read. These requested monthly fee changes help cover these and other costs.

Other requested changes relate to the opportunity for customers to keep their existing meters. For more details and information about the filing with the Commission, smart meters and the opt out program, visit www.myavista.com/smartmeters.

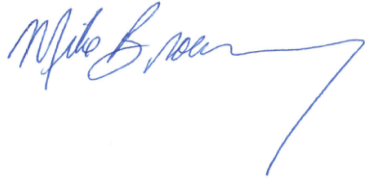
The benefits of Smart Meters

Avista's smart meter program provides benefits for all participating customers in Washington, and we respect your right to choose. Opting out of this program won't allow you to take advantage of the benefits that come with this technology, including:

- **More responsive service** – Smart meters communicate directly with Avista; we'll be able to detect and restore power outages even more quickly.
- **Information at your fingertips** – Online access to charts and graphs that give you detailed insight into your energy use.
- **More control of your energy dollar** – Smart meters provide personalized information to help you better manage your monthly bill.
- **More personalized service** – Our representatives will have more information available to provide solutions unique to your specific needs.
- **Contribute to a more sustainable community** – This technology will allow us to integrate more renewables onto the system and help reduce our region's carbon footprint.

If you have additional questions, please contact our Customer Service Representatives at (800) 227-9187 or visit myavista.com/smartmeters.

Sincerely,

A handwritten signature in blue ink that reads "Mike Broemeling". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Mike Broemeling
Avista Director of Customer Service

Note: Avista's requests are proposals, subject to public review and a Commission decision. The Commission has the authority to set final rates that may vary from the utility's request, which may be either higher or lower depending on the results of the investigation. You may contact the UTC to inquire about the Commission process, or to be notified about the scheduled open meetings at which the proposal will be considered. You can contact the Commission to comment on Avista's rate proposal and reference Docket No. UE-200013 via email at comments@utc.wa.gov, by telephone at 1-888-333-WUTC (9882), via letter at: UTC, 621 Woodland Square Loop, P.O. Box 47250, Lacey, WA 98503-7250, or online at: www.utc.wa.gov. Copies of the applications are available for public review on the Commission website, at the Company offices located at: 1411 E. Mission Ave, Spokane, WA 99202, as well as on our website at www.myavista.com/rates.

