The Company's request is a proposal, 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. The WUTC is committed to providing reasonable accommodations for participants with disabilities. If you need reasonable accommodations to participate in this open meeting (or public comment hearing, workshop, etc.) please contact the Commission at 888-333-9882 or email at Consumer@utc.wa.gov. You can contact the Commission to comment on Avista's rate proposals via email at comments@utc.wa.gov, by telephone at 1-888-333-WUTC (9882), via letter at: UTC, P.O. Box 47250, Olympia, WA 98504-7250, or online at: www.utc.wa.gov. Copies of the applications are available for public review on the Commission website

Avista offers a number of programs and services to help customers manage their energy use and costs. Visit www.myavista.com or call 1-800-227-9187 for information on these programs which include Comfort Level Billing, bill payment options, automated payment service, assistance programs such as My Energy Discount, conservation tips, and energy efficiency rebates. Copies of our filings are available for public review at www.myavista.com/rates or on the Commission website at www.utc.wa.gov. You can also submit written questions directly to the Company via mail at: 1411 E Mission Ave, C/O Regulatory Affairs, Spokane, WA 99202.

## Important Notice for Washington Electric and Natural Gas Customers

(May/June 2024)

On May 31, 2024, Avista made annual rate adjustment filings with the Washington Utilities and Transportation Commission (UTC or Commission) that are designed to increase overall electric revenues by approximately \$35.6 million or 5.8% and increase overall natural gas revenue by approximately \$3.4 million or 1.1%. If approved, new rates would take effect Aug. 1, 2024.

The first rate adjustment is related to Avista's electric and natural gas decoupling mechanisms. Decoupling is a mechanism designed to break the link between utility revenues and customer energy usage. Generally, Avista's electric and natural gas revenues are adjusted each month based on the number of customers instead of kilowatt hour and therm sales. The difference between revenues based on sales and revenues based on the number of customers is surcharged or rebated to customers beginning in the following year. The decoupling rate adjustments are designed to increase revenues by \$22 million or 3.6% for electric operations and increase revenues by \$3.4 million or 1.1% for natural gas operations. The electric rate adjustments are primarily driven by the expiration of the prior year decoupling rebate credit. The natural gas rate adjustment is primarily driven by variations in 2023 customer usage related to weather and energy reduction due to the Company's efficiency programs.

The second rate adjustment modifies the level of funding for Avista's electric energy efficiency programs. Each year, customers achieve significant energy savings and receive rebates and incentives through Avista's energy efficiency programs. The Commission approves the amount of funding for these important programs through a portion of energy rates. The electric rate adjustment is designed to increase the amount collected from customers by \$12.9 million, or 2.1%. The Company has not proposed to change the present level of natural gas funding.



The third rate adjustment is related to Avista's Renewable Energy Credit (REC) mechanism applicable to electric customers. Currently, Avista is rebating approximately \$0.9 million to customers, annually. In the present filing, Avista is proposing to adjust the REC rebate to reflect a decrease in the projected net REC revenues for the August 2024 – July 2025 time period. That amount is \$0.2 million. The net effect of the new and expiring REC rebate is an increase in revenue of approximately \$0.7 million, or 0.1%.

**Change in Rates** - If approved by the Commission, residential electric customers in Washington using an average of 945 kilowatt hours/month would see their monthly bills change from \$97.26 to \$105.77, an increase of \$8.51/month, or approximately 8.8%. Residential natural gas customers in Washington using an average of 66 therms per month would see their monthly bills change from \$98.36 to \$100.87, an increase of \$2.51 per month, or approximately 2.6%.

The percentage change varies by rate schedule and depends on how much energy a customer uses. If approved, customers would see the following rate adjustments:

#### Electric Rate Change Proposed Schedule 1 Residential Rates (effective Aug. 1, 2024)

Electric Service	Current Billing Rate	Proposed Change	Proposed Billing Rates
Basic Charge	\$9.00	\$0.00	\$9.00
First 800 kWhs/ month	\$0.09096/ kWh	\$0.00901/ kWh	\$0.09997/ kWh
Next 700 kWhs/ month	\$0.10682/ kWh	\$0.00901/ kWh	\$0.11583/ kWh
Over 1,500 kWhs/ month	\$0.12635/ kWh	\$0.00901/ kWh	\$0.13536/ kWh

# Proposed Electric Rate Change by Schedule (effective Aug. 1, 2024)

Schedule No.	Rate Schedule	% Change in Billed Revenue
1	Residential	8.7%
11/12/13	General Service	3.5%
21/22/23	Large General Service	4.1%
25/251	Ex. Lg. General Service	1.6%
31/32	Pumping Service	5.1%
41-48	Street and Area Lights	2.2%
Overall		5.8%

#### Natural Gas Rate Change Proposed Schedule 101 Rates (effective Aug. 1, 2024)

Natural Gas Service	Current Billing Rate	Proposed Change	Proposed Billing Rates
Basic Charge CCA Credit	(\$1.87)	\$0.00	(\$1.87)
First 70 therms/ month	\$1.51856/ therm	\$0.03804/ therm	\$1.55660/ therm
Over 70 therms/ month	\$1.67040/ therm	\$0.03804/ therm	\$1.70844/ therm

## Proposed Natural Gas Rate Change by Schedule (effective Aug. 1, 2024)

Schedule No.	Rate Schedule	% Change in Billed Revenue
101	General Service	2.5%
111/112	Large General Service	-2.3%
131/132	Interruptible Sales Service	0.0%
146	Transportation Service	0.0%
Overall		1.1%

WN U-29

Tenth Revision Sheet 175 canceling Ninth Revision Sheet 175

AVISTA CORPORATION dba Avista Utilities

#### SCHEDULE 175 DECOUPLING MECHANISM – NATURAL GAS

#### PURPOSE:

This Schedule establishes balancing accounts and implements an annual rate adjustment mechanism that decouples or separates the recovery of the Company's Commission authorized revenues from the therm sales to customers served under the applicable natural gas service schedules.

#### **APPLICABLE:**

To Customers in the State of Washington where the Company has natural gas service available. This schedule shall be applicable to all retail customers taking service under Schedules 101, 111, 112, 116, and 131. This Schedule does not apply to Schedules 132 and 146 customers (Transportation Service For Customer-Owned Gas) or Schedule 148 customers (Special Contracts). Applicable Customers will be segregated into two (2) distinct Rate Groups:

Group 1 – Schedule 101 Group 2 – Schedules 111, 112, 116, 131

MONTHLY RATE:

Group 1 – \$0.04391 per therm Group 2 – \$0.01171 per therm

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Issued May 31, 2024

Effective August 1, 2024

Issued by Avista Corporation By

tich Shba

Patrick Ehrbar, Director of Regulatory Affairs

#### Avista Corp.

AVISTA

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

May 31, 2024

Jeff Killip Executive Director and Secretary Washington Utilities and Transportation Commission 621 Woodland Square Loop SE Lacey, WA 98503

#### Re: Tariff WN U-29, Natural Gas Service Natural Gas Decoupling Rate Adjustment

Dear Mr. Killip:

Attached for electronic filing with the Commission is the following tariff sheet proposed to be effective August 1, 2024:

#### Tenth Revision Sheet 175 Canceling Ninth Revision Sheet 175

This filing is the "Natural Gas Decoupling Rate Adjustment", filed in compliance with the Commission's Order No. 05 in Docket UG-140189 and Order No. 9 in Docket UE-190335. In Docket UE-140188, the Commission approved a natural gas decoupling mechanism for Avista for a five-year period. In Docket UE-190335, the Commission extended the mechanism for an additional five-year period and approved moving the effective date of the annual decoupling tariff revisions from November 1 to August 1. This filing amortizes the 2023 deferral balances over the period August 1, 2024 – July 31, 2025.

The purpose of the natural gas decoupling mechanism is to decouple the Company's Commissionauthorized revenues from therm sales, such that the Company's revenues will be recognized based on the number of customers served under the applicable natural gas service schedules. The decoupling mechanism allows the Company to 1) defer the difference between actual decouplingrelated revenue received from customers through volumetric rates, and the decoupling-related revenue approved for recovery in the Company's last general rate case; and 2) file a tariff to surcharge or rebate, by rate group, the total deferred amount accumulated in the deferred revenue accounts for the prior January through December time period. The proposed tariff reflects a <u>surcharge</u> of 4.391 cents per therm for the Residential Group served under Schedule 101, which is designed to recover approximately \$6.0 million from the Residential Group. The present <u>surcharge</u> rate of 0.587 cents per therm is presently designed to recover from customers approximately \$0.8 million. Therefore, the net overall increase proposed for the Residential Group is 3.804 cents per therm, or an increase of approximately \$5.2 million or 2.5% from the Residential Group customers.

In addition, the proposed tariff reflects a <u>surcharge</u> of 1.171 cents per therm for the Non-Residential Group served under Schedules 111, 112, 116, and 131, which is designed to recover approximately \$0.8 million from the Non-Residential Group. The present <u>surcharge</u> rate of 3.987 cents per therm is presently designed to recover from applicable customers approximately \$2.6 million. Therefore, the net overall decrease proposed for the Non-Residential Group is a rate decrease of 2.816 cents per therm, or a decrease of approximately \$1.8 million or 2.3% for the Non-Residential Group customers.

	Expiring Present	Proposed	Proposed
	Decoupling Revenue	Decoupling Revenue	Decoupling Change
Residential Group	\$807,174	\$6,037,991	\$5,230,817
Non-Residential Group	\$2,623,305	\$770,477	(\$1,852,829)

### **Residential Group Rate Determination**

The Company recorded \$5,095,431 in the surcharge direction in deferred revenue for the natural gas Residential Group in 2023. The 3% incremental surcharge limitation, discussed later in this letter, resulted in no reduction of the 2023 deferral surcharge. The proposed surcharge rate of 4.391 cents per therm is designed to recover \$6,037,991 from the Company's residential natural gas customers served under rate Schedule 101. The following table summarizes the components of the Company's requested surcharge:

2023 Deferred Revenue	\$5,095,431
Add: Earnings Sharing/DSM Adjustment	\$0
Add: Prior Year Carryover Balance	\$185,239
Add: Interest through 07/31/2025	\$481,941
Add: Revenue Related Expense Adj.	\$275,380
Total Requested Recovery	\$6,037,991
Customer Surcharge Revenue	\$6,037,991
Carryover Deferred Revenue	\$0

Attachment A, page 1 shows the derivation of the proposed surcharge rate to recover the 2023 deferred revenue (including prior period unamortized deferred revenue) plus interest and revenue-related expenses, based on projected sales volumes for Schedule 101 during the surcharge/amortization period (August 2024 through July 2025). As identified in Tariff Schedule 175 under Step 6 of "Calculation of Monthly Deferral", interest on the deferred balance accrues at

the quarterly rate published by the FERC.<sup>1</sup> If the proposed surcharge is approved by the Commission, the 2023 deferral balance, less earnings sharing (if any), plus interest through July, will be transferred into a regulatory asset balancing account along with any residual regulatory asset balance approved for recovery in Docket UG-220379, Avista's 2023 Natural Gas Decoupling Rate Adjustment filing. The balance in the account will be reduced each month by the revenue collected under the tariff.

## Non-Residential Group Rate Determination

The Company recorded \$643,544 in the surcharge direction in deferred revenue for the natural gas Non-Residential Group in 2023. The 3% incremental surcharge limitation, discussed later in this letter, resulted in no reduction of the 2023 deferral surcharge. The proposed surcharge rate of 1.171 cents per therm is designed to recover \$770,477 from commercial and industrial customers served under rate Schedules 111, 112, 116, and 131. The following table summarizes the components of the Company's request for recovery:

2023 Deferred Revenue	\$643,544
Add: Earnings Sharing/DSM Adjustment	\$0
Add: Prior Year Carryover Balance	\$31,181
Add: Interest through 07/31/2025	\$61,051
Add: Revenue Related Expense Adj.	\$34,701
Total Requested Recovery	\$770,477
Customer Surcharge Revenue	\$770,477
Carryover Deferred Revenue	\$0

Attachment A, page 3 shows the derivation of the proposed surcharge rate to recover the 2023 deferred revenue (including prior period unamortized deferred revenue) plus interest and revenue-related expenses, based on projected sales volumes for Schedules 111, 112, 116, and 131 during the surcharge/amortization period (August 2024 through July 2025). As identified in Tariff Schedule 175 under Step 6 of "Calculation of Monthly Deferral", interest on the deferred balance accrues at the quarterly rate published by the FERC. If the proposed surcharge is approved by the Commission, the 2023 deferral balance, less earnings sharing (if any), plus interest through July, will be transferred into a regulatory asset balancing account to be combined with any residual balance approved for recovery in Docket UG-220379, Avista's 2023 Natural Gas Decoupling Rate Adjustment filing. The balance in the account will be reduced each month by the revenue collected under the tariff.

Support showing the monthly calculation of the 2023 deferred revenue balances for both the Residential and Non-Residential Groups is provided as Attachment B. These calculations were also provided to the Commission in quarterly reports (see Docket UG-190335). The allowed decoupling baseline values that were updated when Docket UG-220054 rates became effective

<sup>&</sup>lt;sup>1</sup> The FERC effective interest rate was 6.31% in Q1 of 2023, 7.50% in Q2, 8.02% in Q3 and 8.35% in Q4. The current rate of 8.50% has been used going forward as an estimate for purposes of this rate determination.

December 21, 2022 and remained in effect for all of 2023. Attachment B shows the monthly deferral calculations for 2023.

## <u>Earnings Test</u>

The decoupling mechanism is subject to an annual earnings test based on the Company's year-end Commission Basis Reports that reflect actual decoupling-related revenues and various normalizing adjustments. If the earnings test rate of return exceeds the allowed rate of return approved by the Commission, one-half of the revenue in excess of the rate of return will be shared with customers through the decoupling rate adjustment.

The 2023 Washington Natural Gas Earnings Test sharing calculations are shown on page 6 of Attachment A. The Earnings Test showed that the Company earned a 6.91% rate of return on a normalized basis in 2023 which does not exceed the allowed return of 7.53%.<sup>2</sup> Therefore, no earnings sharing adjustment is applied to the 2023 decoupling deferred balances.

## 3% Annual Rate Increase Test

Decoupling annual rate adjustment surcharges are subject to a 3% annual rate increase limitation. There is no limit to rebate rate adjustments. As described in Tariff Schedule 175 the 3% annual rate increase limitation "will be determined by dividing the incremental annual revenue to be collected (proposed surcharge revenue less present surcharge revenue) under this Schedule by the total "normalized" revenue for the two Rate Groups for the most recent January through December time period. Normalized revenue is determined by multiplying the weather-corrected usage for the period by the present rates in effect. If the incremental amount of the proposed surcharge exceeds 3%, only a 3% incremental rate increase will be proposed, and any remaining deferred revenue will be carried over to the following year. There is no limit to the level of the decoupling rebate, and the reversal of any rebate would not be included in the 3% incremental surcharge test".

Revenue from 2023 normalized loads and customers calculated at the billing rates in effect as of May 1, 2024, for the two rate groups are shown on line 1 of page 7 of Attachment A (these are the same values used to allocate the earnings sharing if any, on lines 11 and 12 of page 6).

The proposed Residential Group rate results in a surcharge of 2.46% and therefore does not exceed the 3% limitation. The proposed Non-Residential Group rate results in a rebate of 2.32% and therefore also does not exceed the 3% limitation.

## **Conclusion**

In conclusion, Avista requests the Commission approve the proposed Schedule 175 surcharge rate of 4.391 cents per therm for the Residential Group and the proposed surcharge rate of 1.171 cents per therm for the Non-Residential Group. The estimated annual revenue change associated with this filing is an increase of approximately \$3.4 million (\$5.2 million increase in Residential and

<sup>&</sup>lt;sup>2</sup> The allowed return was 7.53% for the rates in effect throughout 2023 as established by Docket UG-220054.

\$1.8 million decrease in Non-Residential). Residential customers taking service on Schedule 101 using an average of 66 therms would see their monthly bills change from \$98.35 to \$100.86, an increase of \$2.51, or 2.55%.

The Company has provided in this filing a copy of its customer notice which will be included as a bill insert in the June – July time frame. Please direct any questions on this matter to Joel Anderson at (509) 495-2811.

Sincerely,

/s/ Joe Miller

Joe Miller Senior Manager of Rates and Tariffs, Regulatory Affairs Enclosures