



Avista Corporation

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August 30, 2024

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

RE: Avista Utilities Tariff WN U-28, Schedule 64, Clean Energy Implementation Plan

Dear Mr. Killip:

Attached for electronic filing with the Washington Utilities and Transportation Commission (Commission) is Avista Corporation, dba Avista Utilities (Avista or the Company) proposed new electric tariff sheets, WN U-28 – Electric Service:

Original Sheet 64

I. PURPOSE

The purpose of this filing is to introduce Avista’s proposed tariff Schedule 64, which outlines the cost recovery related to implementation of the Company’s Clean Energy Implementation Plan (CEIP or Plan). Avista is requesting approval of its proposed tariff schedule with an effective date of November 1, 2024.

II. BACKGROUND

Avista filed its first CEIP on October 1, 2021, pursuant to WAC 480-100-640, describing the Company’s interim and specific clean energy targets, specific actions it will take towards achieving those targets, and identifying Customer Benefit Indicators (CBIs) designed to measure progress. Avista’s CEIP was conditionally approved on June 16, 2022.¹

¹ Docket UE-210628 Order 01

In order to implement the CEIP and associated 38 conditions, the Company filed a deferred accounting petition (Petition) to defer the costs required to implement the CEIP.² Included in the Petition and as described more fully below, in its CEIP, Avista proposed to implement a “Named Communities Investment Fund” (NCIF or Fund) as a specific action to be dedicated to the equitable distribution of energy and non-energy benefits and reduction in burdens to Vulnerable Populations and Highly Impacted Communities (Named Communities). The Company originally requested to defer implementation costs until such time that it could propose recovery in base rates during its next general rate case (i.e., its 2024 rate case with rate effective December 21, 2024), defer NCIF costs into the future, and to begin amortizing deferred costs on August 1, 2023. The Company’s Petition was approved on July 28, 2022, with an effective date starting June 16, 2022 (approval date of Avista’s 2021 CEIP).³

Due to minimal deferred NCIF costs through mid-2023, the Company did not propose to begin amortization of deferred costs on August 1, 2023, as proposed in its Petition. Additionally, considering the relatively minimal and uncertain nature of the other new costs associated with implementing the 2021 CEIP, Avista did not include them in its pending general rate case.⁴ As such, on March 25, 2024, Avista filed for an amendment to Order 01 in Docket UE-220350 requesting that the Company be allowed to (1) defer costs associated with the implementation of its 2021 CEIP beyond December 21, 2024, (2) defer costs associated with the implementation of future CEIPs, and (3) to treat the approved deferral as a balancing account when the Company seeks to recover the deferral. On May 9, 2024, the Commission issued order 02 in Docket UE-220350 approving the aforementioned amendments.

III. CLEAN ENERGY IMPLEMENTATION PLAN & NAMED COMMUNITY INVESTMENT FUND INCREMENTAL SPEND

To implement the CEIP, the Company incurred incremental labor and non-labor charges related to the delivery of the Plan and projects under the NCIF. The Company is seeking recovery of \$2.1 million CETA related labor and non-labor costs, and the associated interest and revenue conversion costs. As listed in Table No. 1 below, the labor and non-labor charges total \$1.9 million for the period of June 16, 2022, through June 30, 2024.

² Docket UE-220350.

³ Docket UE-220350, Order 01.

⁴ Dockets UE-240006 and UG-240007.

Table No. 1 – CEIP & NCIF Life to Date Incremental Summary

Category	Labor	Non-Labor	Total
Clean Energy Implementation Plan	\$546,846	\$583,630	\$1,130,476
Named Community Investment Fund	\$8,141	\$775,933	\$784,074
Total	\$554,986	\$1,359,536	\$1,914,550

As provided in Table No. 1 above, the CEIP labor and non-labor charges totaled \$1.1 million with costs associated with incremental full-time employees, supporting the Equity Advisory group, and the Distributed Energy Resources (DER) Potential Study, amongst others. The labor and non-labor charges associated with Avista’s NCIF totaled \$0.78 million, with projects and investments supporting a range of individuals, small businesses, community centers, and more in Named Community locations. Table No. 2 below, provides a summary of the CEIP labor and non-labor changes by year.

Table No. 2 – CEIP Incremental Labor and Non-Labor by Year

Category	Year	Labor	Non-Labor	Total
Clean Energy Implementation Plan	2022	\$0	\$21,676	\$21,676
	2023	\$349,970	\$266,589	\$616,559
	As of 06/30/2024	\$196,876	\$295,365	\$492,242
	Total	\$546,846	\$583,630	\$1,130,476

CEIP Incremental Labor

To support the implementation of the 2021 CEIP, the Company added three full-time incremental roles: an electric distribution planning engineer, a project manager, and a customer engagement manager. The electric distribution planning engineer in the System Planning Department was hired at the end of December 2022 to support the additional CEIP requirements of the DER Potential Study and the Distribution Planning Advisory Group (DPAG). Under the Clean Energy Strategy Department, a project manager role was hired in January 2023 to support projects resulting from the NCIF and other clean energy related initiatives and pilots. The customer engagement manager was hired in January 2024 to manage the Equity Advisory Group (EAG) and pursue community engagements related to Avista’s CEIP. As listed above in Table No. 2 above, the incremental labor associated with these roles was \$0.55 million.

CEIP Incremental Non-Labor

The Company’s non-labor costs associated with its CEIP totaled \$0.59 million with an itemization of the charges listed by year below in Table No. 3 followed by a narrative description of each.

Table No. 3 – CEIP Life to Date - Incremental Non-Labor Spend Detail

Clean Energy Implementation Plan Non-Labor	Year End 2022	Year End 2023	As of 06/30/ 2024	Total
Cedar Plank	\$3,379	\$4,696	\$3,697	\$11,772
Equity Advisory Group Stipend	\$1,620	\$3,150	\$2,340	\$7,110
Acxiom	\$16,677	\$61,200	\$66,708	\$144,585
Applied Energy Group	\$0	\$197,543	\$216,565	\$414,108
Survey Monkey Multiple Languages License	\$0	\$0	\$6,055	\$6,055
CEIP Non-Labor Grand Total	\$21,676	\$266,589	\$295,365	\$583,630

Cedar Plank – The Company contracted with Cedar Plank, a Spokane-based company doing business as Social Impact Partners Northwest providing facilitation services, to facilitate Avista’s monthly EAG meetings for a total of \$11,772.

Equity Advisory Group Stipend – In an effort to compensate EAG members for their time and input on Avista’s equity planning and execution efforts, the Company offers a stipend of \$90 per person per meeting. The total EAG stipend costs incurred totals \$7,110.

Acxiom – In order to support the development and analysis of Avista’s 2021 CEIP CBIs, the Company acquired third-party data through Acxiom to match and append additional data to Avista’s data. Calculating various CBIs has been and will remain dependent on Acxiom data. The total cost incurred for Acxiom data is \$144,585.

Applied Energy Group – Under the 2021 CEIP, Condition 14 required the Company to conduct a DER Potential Assessment:

“...include a Distributed Energy Resources (DERs) potential assessment for each distribution feeder no later than its 2025 electric IRP. Avista will develop a scope of work for this project no later than the end of 2022, including input from the IRP TAC, EEAG, and DPAG. The assessment will include a low-income DER potential assessment. Avista will document its DER potential assessment work in the Company’s 2023 IRP Progress Report in the form of a project plan, including project schedule, interim milestones, and explanations of how these efforts address WAC 480-100-620(3)(b)(iii) and (iv).”

In compliance with this condition, Avista contracted with Applied Energy Group (AEG) in May of 2023 to conduct a DER potential assessment for each Washington electric distribution feeder. AEG completed the study in June 2024 for a total of \$414,108.

Survey Monkey Multiple Languages License – In April 2024, the Company published its 2024 CEIP customer survey to Washington electric customers in anticipation of gathering information for the 2025-2029 CEIP. The 20-question survey was available online in English and Spanish, and in paper form in Russian, Spanish, Ukrainian, and Arabic. Avista utilized Survey Monkey to host the survey, which charged \$6,055 to allow the platform to display multiple languages.

IV. NAMED COMMUNITY INVESTMENT FUND DETAILS

NCIF Overview

Avista proposed the NCIF in its 2021 CEIP as a specific action the Company would take to assist with the equitable distribution of energy and non-energy benefits and reduction in burdens in Named Communities. The Company committed up to approximately one percent of Washington electric retail revenues or approximately \$5 million at the time of the proposal. Table No. 4 below shows a breakdown of the categories of the NCIF.

Table No. 4 – Named Communities Investment Fund

NCIF Amount	NCIF Category
40 percent or up to \$2 million	Energy Efficiency Supplement (Tariff Schedule 91)
20 percent or up to \$1 million	Distribution Resiliency
20 percent or up to \$1 million	Customer & Third-Party Grants & Incentives
10 percent or up to \$0.5 million	Outreach & Engagement
10 percent or up to \$0.5 million	Other Projects, Programs, or Initiatives

Avista began investing in Named Communities through Company projects/programs or leveraging the fund as an incentive or grant to develop projects led by local customers or third parties, supported by Avista. These funds may help uneconomic projects become more cost-effective for Named Communities.

The filing discussed herein will not address energy efficiency allocated NCIF projects as those costs are recovered through Avista’s Demand Side Management Rate Adjustment tariff schedule 91.

NCIF Prioritization Methodology

The \$2.0 million energy efficiency portion of the NCIF is administered and governed by Avista’s Energy Efficiency department. A prioritization matrix for projects, shown in Table No. 5 below, was developed in collaboration with Avista’s EAG to ensure an equity lens is provided for all proposed project decisions.

Table No. 5 – EAG NCIF Prioritization Considerations

Rank	EAG NCIF Prioritization Considerations
1	Focus efforts on improving energy efficiency (and EE awareness/education) for schools, community centers, and other places where Named Community members spend time.
1	Focus efforts on improving energy efficiency for Spokane Tribe partners.
2	Improve energy efficiency in multi-family and mobile home communities.
3	Increase tree canopy and shade in Named Communities (consider tradeoffs with solar).
3	Increase access to energy efficient products and appliances for Named Communities.
4	Increase awareness of and engagement in energy efficiency programs while also meeting whole-house needs through community-based partnerships and referrals to services.
5	Set aside funds to match for energy efficiency grant applications for community organizations and tribal partners (could have higher feasibility).
6	Focus efforts on improving energy efficiency for community members without stable housing (consider including with other initiatives).

The remaining \$3.0 million of the NCIF is administered and governed by Avista’s department of Community Vitality and Economic Growth; this community facing department focuses on supporting vulnerable customers and encouraging economic growth. Project evaluation and oversight includes Avista employees and its EAG.

NCIF Communication and Outreach

After the NCIF was formed in 2022, Avista immediately established a formal process for the public to submit proposals leveraging its existing grant application software platform. Based on existing community awareness as a charitable grant provider, and its robust partner network established through many years of community outreach and engagement, Avista was well positioned to promote the Fund. An email introducing the Fund and the online grant application was sent to the Company’s full list of 250 organizations throughout Eastern Washington. The distribution list was generated from the Avista Foundation database, which includes any person or organization who has applied for or received a grant since 2010. The email was also sent to community partners established through Avista’s Community Outreach and Support department, Regional Business Managers, and Account Executives. The NCIF was also promoted through social media, Avista’s multiple advisory groups, and public participation meetings. In addition, Avista hosted virtual open house workshops where success stories were shared pertaining to various grants and project awards. The Company also conducted site visits to prospective applicant facilities and organizations to encourage applications. In 2024, a paper application in English and Spanish was developed to reduce the burden for applicants who may not have computer access. To promote the Fund, Avista provides these paper applications and NCIF literature at community events where Avista has an informational booth.

NCIF Incremental Spend

As listed in Table No. 1 above and further detailed in Table No. 6 below, the NCIF labor and non-labor charges totaled \$0.78 million, with \$8,141 associated with temporary labor charges supporting the Medical Battery Back Up Pilot (CEIP Condition #10) described further below.

Table No. 6 – NCIF Incremental Labor and Non-Labor by Year

Category	Year	Labor	Non-Labor	Total
Named Communities Investment Fund	2022	\$0	\$45,034	\$45,034
	2023	\$8,141	\$304,176	\$312,317
	As of 06/30/2024	\$0	\$426,723	\$426,723
	Total	\$8,141	\$775,933	\$784,074

NCIF Incremental Labor

CEIP, Condition #10 required the Company to:

“. . . identify at least one specific action that will serve a designated subset of Named Communities, to be funded by the Named Communities Investment Fund, and to identify and track all CBIs relevant to this specific action. The location identified for the specific action will be at the granularity of the designated Named Communities subset.”

After evaluation of options, Avista’s advisory groups selected a pilot program where a subset of Named Community members who rely on at-home medical equipment were provided with a battery powered by solar panel equipment and a portable air conditioning device. Avista partnered with Aging & Long-Term Care of Eastern Washington (ALTCEW) to identify and engage 100 senior and/or long-term care customers with medical equipment needs for the pilot. To support implementation of this condition, Avista hired a part-time, project-based employee. This employee visited each customer’s home to deploy the back-up equipment, provide equipment education, establish an emergency plan if needed, and answer any questions. As listed in Table No. 6 above, labor associated with this role totaled \$8,141 in 2023.

NCIF Incremental Non-Labor

A majority of the non-labor costs associated with the NCIF were a direct result of projects prioritized for those residing in Named Communities or organizations that serve members of Named Communities. As show in Table No. 7 below, the NCIF spent a total of \$0.77 million for the benefit of Named Communities with projects supporting distribution resiliency, customer and third-party initiatives, outreach and engage efforts, and various other projects.

Table No. 7 – NCIF Incremental Summary by Project Year & by Type

Year	Distribution Resiliency	Customer & Third-Party	Outreach & Engagement	Other Projects, Programs	Total
Year End 2022	\$0	\$5,200	\$39,834	\$0	\$45,034
Year End 2023	\$30,511	\$5,740	\$27,322	\$240,603	\$304,176
As of 06/2024	\$114,250	\$145,095	\$42,830	\$124,547	\$426,723
Total	\$144,761	\$156,035	\$109,986	\$365,150	\$775,933

Table No. 8 below provides a list of NCIF projects by area and year with the accompanying costs incurred. Each project detail below will provide a summary of the total funds awarded over the initial CEIP reporting period through June 30, 2024. The asterisk (*) references projects where funds were utilized from more than one category.

Table No. 8 – NCIF Life to Date Incremental Non-Labor Spend Detail

Named Community Investment Fund Category & Project	Year End 2022	Year End 2023	As of 06/30/2024	Total
<i>Distribution Resiliency</i>				
Martin Luther King, Jr. Community Center*	\$0	\$20,174	\$0	\$20,174
Town of Malden*	\$0	\$10,337	\$114,250	\$124,587
<i>Distribution Resiliency Subtotal</i>	\$0	\$30,511	\$114,250	\$144,761
<i>Customer & Third-Party Grants / Incentives</i>				
Kids Making Sense®	\$5,200	\$0	\$0	\$5,200
Kettle Falls Community Chest	\$0	\$5,740	\$0	\$5,740
City of Spokane – Planit Geo	\$0	\$0	\$33,082	\$33,082
The Lands Council – Tree Planting	\$0	\$0	\$48,000	\$48,000
Christ Kitchen	\$0	\$0	\$40,000	\$40,000
SNAP Homes – Air Conditioning Units	\$0	\$0	\$24,014	\$24,014
<i>Customer & Third-Party Grants / Incentives Subtotal</i>	\$5,200	\$5,740	\$145,095	\$156,035
<i>Outreach & Engagement</i>				
Public Participation Partners (P3)	\$39,834	\$2,705	\$0	\$42,539
Medical Battery Back Up Pilot Intern Labor*	\$0	\$15,339	\$0	\$15,339
Hanna & Assoc – Medical Battery Pilot Fliers*	\$0	\$2,187	\$0	\$2,187
Cybergrants – NCIF Online Application	\$0	\$6,925	\$5,552	\$12,477
Zoom Subscription	\$0	\$27	\$0	\$27
Malden Outreach Support*	\$0	\$139	\$68	\$207
Michael Crawford – MLK CC Photos*	\$0	\$0	\$675	\$675
ASAP Translation Services – 2024 CEIP Survey	\$0	\$0	\$820	\$820
Hanna & Assoc – CEIP Newsletter Template	\$0	\$0	\$1,639	\$1,639
Hanna & Assoc – NCIF Paper Application	\$0	\$0	\$1,375	\$1,375

Weglot / Myavista.com	\$0	\$0	\$6,600	\$6,600
Mike Ellis – Media Services	\$0	\$0	\$4,500	\$4,500
Desautel Hege	\$0	\$0	\$21,600	\$21,600
<i>Outreach & Engagement Subtotal</i>	<i>\$39,834</i>	<i>\$27,322</i>	<i>\$42,830</i>	<i>\$109,986</i>
<i>Other Projects & Programs</i>				
Medical Battery Back Up Pilot*	\$0	\$216,331	\$0	\$216,331
MLK Community Center – Windows*	\$0	\$24,272	\$0	\$24,272
Gladish Community & Cultural Center	\$0	\$0	\$99,547	\$99,547
Career Path Services	\$0	\$0	\$25,000	\$25,000
<i>Other Projects & Programs Subtotal</i>	<i>\$0</i>	<i>\$240,603</i>	<i>\$124,547</i>	<i>\$365,150</i>
<i>NCIF Grand Total</i>	<i>\$45,034</i>	<i>\$304,176</i>	<i>\$426,722</i>	<i>\$775,932</i>

Distribution Resiliency

Martin Luther King, Jr. Community Center* (MLK Center) – In March 2023, Avista partnered with the MLK Center and the City of Spokane to submit a Washington Department of Commerce Solar Plus Storage grant application. The grant is designed to help develop neighborhood resilience centers to provide shelter and resources during climate and other emergencies. Total costs are estimated at \$3.5 million with energy efficiency improvements, a new roof, a solar array, and a battery storage system. In August 2023, the Department of Commerce awarded the project \$1.5 million, with a total NCIF estimated contribution of \$1.3 million to the effort across the third quarter 2023 and into 2024-2025. As of June 2024, the Fund spent \$20,174 on the project.

Town of Malden* – During the third quarter 2023, Avista partnered with the Town of Malden for two projects supporting the town hall and a to-be-built community center. The town hall project included an energy efficiency scoping review and a solar feasibility study to reduce monthly energy. The town hall project was completed in the fall of 2023 with a 52-kW solar array. As of June 2024, the Fund spent \$124,587 on the project. A future project will include a 43-kW array for the to-be-built community center.

Customer and Third-Party Grants/Incentives

Kids Making Sense® – In May 2022, Avista partnered with the Spokane Regional Clean Air Agency to sponsor two, Kids Making Sense® (KMS) program kits for the fall 2022 academic year for students in 6-12 grade and located in Named Community schools. Each kit contained two PurpleAir sensors for indoor and outdoor installation, a hand-held particle sensor, smart phones, curriculum lab kit, access to the KMS data-visualization website, and access to an air quality scientist. Through this program students gain an understanding of air pollution, particle matter pollution, why particle matter is measured for regulatory purposes, and encourages them to take personal action to reduce air pollution. As of June 2024, the NCIF provided \$5,200 for this project.

Kettle Falls Community Chest – Avista supported the renovation of a foodbank that serves individuals residing in rural communities in the northern portion of eastern Washington. The

foodbank received combined support through the NCIF, the Company's energy efficiency rebates, and a grant with low-interest rate loan from the US Department of Agriculture for a complete overhaul of the foodbank, with little to no cost to the non-profit organization. As the building relies on a dual-fuel system, the NCIF supplemented costs to support upgrades to windows, lighting, and HVAC systems at \$5,740 for the project.

City of Spokane – PlanIt Geo – Avista granted an award to the City of Spokane in 2023 for a three-year subscription to PlanIt Geo's TreePlotter software. The software establishes a data sharing platform to develop a comprehensive tree inventory, canopy analysis, and canopy modeling for the city. Named Community locations will benefit from the city's ability to prioritize areas in need of additional trees to reduce heat island effects and other impacts related to the lack of tree canopy. As of June 2024, the Fund provided \$33,082 for this project.

The Lands Council – Tree Planting – During the SpoCanopy Expo Forest Tree Planting week in May of 2024, volunteers planted 500 trees in the urban Spokane region. The Lands Council leveraged federal funding for the trees, equipment and staff, while the NCIF was used to market the event and enlist the cadre of volunteers to plant the trees over the five-day period. In the months and years after the plantings occur, The Lands Council will work with partners to assess tree survival rates and survey tree recipients to determine benefits to their utility bills and well-being. As of June 2024, the Fund supplied \$48,000 for this project.

Christ Kitchen – Avista partnered with Christ Kitchen, a Christ-centered non-denominational ministry providing employment, job training, discipleship, and support for women living in poverty in the Spokane area, to sponsor a workforce development program. Through this sponsorship, Avista anticipates an impact to the CBI Reduction of Burden and will aid women seeking employment in the food service industry with a stabilizing support system to improve long-term outcomes. As of June 2024, the NCIF spent \$40,000 for this sponsorship.

SNAP Homes – Air Conditioning Units – In an effort to reduce vulnerability and increase resiliency during extreme summer heat events, Avista awarded funds to the Spokane Neighborhood Action Partner (SNAP) to distribute 60 portable air conditioning units at no cost to 60 households in Named Communities. Additionally, at the time of distribution, materials and education are provided about enrollment in various Avista programs for energy discounts, weatherization, energy efficiency, and other opportunities to reduce energy burden. As of June 2024, the NCIF as provided \$24,014 for this project.

Outreach and Engagement

Public Participation Partners (P3) – In the Spring of 2022, in addition to ongoing efforts, Avista recognized the need for a specialized public participation strategy, to reach customers and organizations in Named Communities. The Company pursued the expertise of Public Participation

Partners (P3), a South Carolina based company, to focus on targeted outreach to underrepresented populations, including those with limited English proficiencies. Avista sought specialized consulting services for its Washington service territory that provided an equitable approach to identifying and mitigating barriers to participation and obtaining valuable customer input. In the first quarter 2023, P3 delivered a public participation “playbook,” which aided in the creation of Avista’s 2023 Public Participation Plan (PPP) filed on May 1, 2023.⁵ As of June 2024, the NCIF spent \$42,539.

Medical Battery Back Up Pilot Intern Labor* – In addition to the temporary Avista employee discussed in the NCIF Incremental Labor section above, ALTCEW hired a temporary intern to assist Avista and ALTCEW with the Medical Battery Back Up pilot. To support distribution resiliency in Named Communities, a pilot to distribute a battery back-up system for customer’s medical equipment was implemented. The pilot was developed based on inputs from Avista’s Energy Assistance Advisory Group (EAAG) and EAG to meet the requirements outlined in its 2021 CEIP Condition #10. A temporary, short-term employee was hired to support delivery of this project. As of June 2024, the Fund provided \$15,339 to NCIF labor on this project.

Hanna & Associates – Medical Battery Pilot Fliers* – Educational materials were created to provide information about the air conditioning unit, the battery, and the solar panel kit for pilot members. As of June 2024, the NCIF provided \$2,187 for this effort.

Cybergrants – NCIF Online Application – Avista contracted with Cybergrants, an existing third-party provider of online application services for the Company’s non-profit Avista Foundation, to develop the NCIF online application for community members and businesses. The application⁶ went live July 10, 2023. The total project cost was \$28,000, with funding split between the NCIF Energy Efficiency and NCIF Outreach & Engagement. As of June 2024, the NCIF provided \$12,447 for this effort.

Zoom Subscription – To host the EAG and public participation meetings, Avista purchased an online meeting platform subscription through Zoom, which a limit of 100 participations. In anticipation of increased participation for the Q2 2023 Public Participation Meeting, Avista purchased a one-time participant increase feature. As of June 2024, the Fund has spent \$27.

Malden Outreach Support* – During the course of the Malden resiliency project, Avista employees were required to visit Malden. The NCIF provided mileage reimbursement at \$207.

⁵ Docket UE-210295.

⁶ The NCIF application can be found at:

https://www.cybergrants.com/pls/cybergrants/quiz.display_question?x_gm_id=5440&x_quiz_id=11888

Michael Crawford – MLK Center Photos* – During the MLK energy efficiency and resiliency project, the Company contracted with Michael Crawford to take before and after photos of the building and renovations for awareness of the project and to show the transformation of the MLK center. As of June 2024, the NCIF has provided \$675 for this effort.

ASAP Translation Services – In April 2024, Avista published its 2024 CEIP customer survey for Washington electric customers. ASAP Translation Services was contracted to translate the survey into Spanish, Ukrainian, Russian, and Arabic. As of June 2024, the NCIF provided \$820 for this effort.

Hanna & Associates – CEIP Newsletter Template – As outlined in the Company’s 2023 PPP, Avista committed to publishing an online newsletter. As of June 2024, the NCIF provided \$1,639 for the creation of a newsletter template.

Hanna & Associates – NCIF Paper Application – To support multiple funding access points, the Company invested in an online and paper application to apply for NCIF grants and awards. As of June 2024, the NCIF provided \$1,375 for the creation of a paper NCIF application.

Mike Ellis – Media Services – Based on EAG comments, Avista prioritized promotion of the NCIF and how it benefits Named Community organizations and their customers. The Company contracted with Mike Ellis to write stories based on the investments made through the NCIF for social media publication. As of June 2024, three stories have been highlighted showcasing the NCIF benefits to Named Communities through projects like Christ Kitchen, the Kettle Falls Community Chest, and the Lands Council for a total of \$4,500 provided by the NCIF. In addition to providing awareness of the benefits of the NCIF, these stories promote the contributions these community organizations provide to their community members.

Weglot / www.myavista.com – In an effort to support multilingual translation on myavista.com, Avista purchased a multilingual translation plug-in feature from Weglot in April 2024. For quality assurance purposes, the first phase of this upgrade included Spanish only. The NCIF was used to support 29%⁷ of the upgrade costs, which only accounts for the Washington residential electric share. As of June 2024, the NCIF provided \$6,600 for this project.

Desautel Hege (DH) – In March 2024, the Company contracted with DH, a Spokane-based social impact agency, to support the creation and execution of Avista’s 2025 PPP, with action items to deepen community engagement efforts with key strategies and tactics. In addition, DH is considering ways to supplement the implementation of actions from the Company’s 2023 PPP.

⁷ The 29% is derived by calculating Washington’s residential electric schedule 01 average monthly billed meter count (approximately 228,000 meters) compared to the system total average monthly billed meter count (approximately 787,000 meters), or $228,000/787,000 = 29\%$.

Their deliverable will also include a timeline, resourcing roles, and budget impacts for Avista to consider. As of June 2024, the Fund has provided \$21,600.

Other Projects and Programs

Medical Battery Back-Up Pilot* – To support distribution resiliency in Named Communities, a pilot to provide a battery back-up system for customer’s medical equipment was implemented. The pilot was developed based on inputs from the Energy Assistance Advisory Group (EAAG) and EAG to meet the requirements outlined in Avista’s 2021 CEIP Condition 10. As of June 2024, the NCIF has provided \$216,331 for this project.

MLK Community Center – Windows* – As part of the MLK residency project for their solar array plus battery storage project, various building and energy efficiency improvements were also planned, including a new roof and new windows. As of June 2024, the NCIF provided \$24,272 to support window replacement.

Gladish Community & Cultural Center – The Gladish Community and Cultural Center is a pivotal cultural and community hub housed in the historic Pullman High School building, supporting a diverse array of tenants, including area small businesses, nonprofits, and two Montessori schools. With support of the NCIF, the building will transition to a modern heating system with mini splits to reduce the building's energy consumption and operating costs, while freeing up critical resources to further enrich and expand its cultural and educational programs. As of June 2024, the NCIF has provided \$99,547 against its grant of \$212,556 for the project materials.

Career Path Services – Career Path Services (CPS) is a workforce development and human services non-profit organization founded 53 years ago in Spokane, WA with a purpose of breaking the spirit of poverty through the dignity of work. In 2024, Avista awarded a grant of \$25,000 from the NCIF to cover a portion of the cost of wages and direct support for workers who serve as an on-demand workforce in support of Habit for Humanity’s housing projects located within many of Spokane’s most underserved neighborhoods such as East Central and Hillyard. Similar to the award made to Christ Kitchen, Avista anticipates an impact to the CBI Reduction of Energy Burden for the Career Path Services workers and a stabilizing support system to improve long-term outcomes.

V. FUTURE NCIF PROJECT COMMITMENTS

Avista continues to see the magnitude of the need for NCIF support for community envisioned and led projects, and the benefits they provide for their communities. As awarded project timelines and activities vary in length, there is a lag between awarded projects and the actual funds spent. In addition to the actualized NCIF community project costs specified in the sections above, the

Company has committed an additional \$3.8 million through June 2024 toward projects that have yet to be realized. Avista anticipates these projects and the associated funds to be completed throughout the remainder of 2024 and into 2025.

VI. CUSTOMER IMPACTS

The proposed Schedule 64 will increase the Company’s annual Washington revenues by approximately \$2 million, or about 0.35%. For purposes of the revenue spread and rate design, the Company applied a percentage of base revenue allocation and a uniform cent per kWh to the individual rate schedules.⁸ As a result of the proposed Schedule 64 impacts, the average Washington residential customer receiving service under schedule 01 will see an increase of \$0.37 per month. If approved, the average monthly bill for residential electric customers using 945 kWh a month would increase from \$105.76 to \$106.13. For all other rate schedules, the following chart includes the estimated monthly bill impact for each customer class based on average use of the customer for each schedule.

Schedule Nos.	Rate Schedule	CEIP Charge	Total Net Monthly Bill Amount	% Change in Billed Revenue
01/07/08	Residential	\$0.00039 per kWh	\$0.39	0.4%
11/12/13/17/18	General Service	\$0.00046 per kWh	\$0.46	0.3%
21/22/23	Large General Service	\$0.00040 per kWh	\$0.40	0.3%
25/25I	Extra Large General Service	\$0.00028 per kWh (First 500,000 kWh) \$0.00028 per kWh (Next 500,500 kWh) \$0.00000 per kWh (Over 600,000 kWh)	\$0.28	0.2%
31/32	Pumping	\$0.00041 per kWh	\$0.41	0.4%
41-48	Street and Area Lights	\$0.00171 per kWh	\$0.17	0.4%
Total			\$1.94	0.3%

This filing is being made concurrently with six other electric and natural gas rate adjustments applicable to Avista customers.⁹ Collectively, if approved by the Commission, residential electric customers using an average of 945 kilowatt hours/month would see their monthly bills change from \$105.76 to \$109.58, an increase of \$3.82/month, or approximately 3.6%.

⁸ Consistent with the rate spread and rate design for the Company’s LIRAP tariff the 3rd block for Schedules 25 and 25I have been removed from the allocations.

⁹ Avista’s Bonneville Power Administration (BPA) Residential Exchange Program, Wildfire Expense Balancing Account, Insurance Expense Balancing Account, Clean Energy Implementation Plan (CEIP), Low Income Rate Assistance Program (LIRAP), Climate Commitment Act (CCA) and Purchased Gas Cost Adjustment will all be filed simultaneously on August 30, 2024.

VII. CONCLUSION

As outlined in the attached Schedule 64, Avista hereby requests that the tariff proposed becomes effective on November 1, 2024. Also included with this filing is a draft of the customer notice that will be sent to customers in September. If you have any questions regarding this filing, please contact me at (509) 495-7950 or amanda.ghering@avistacorp.com.

Sincerely,

/s/ Amanda Ghering

Amanda Ghering
Regulatory Policy Analyst

AVISTA CORPORATION
dba Avista Utilities

SCHEDULE 64

CLEAN ENERGY IMPLEMENTATION RATE ADJUSTMENT- WASHINGTON

APPLICABLE:

To Customers in the State of Washington where the Company has electric service available. This Clean Energy Implementation Rider Adjustment or Rate Adjustment shall be applicable to all retail customers for charges for electric energy sold and to the flat rate charges for Company-owned or Customer-owned Street Lighting and Area Lighting Service. This Rate Adjustment is designed to recover costs incurred by the Company associated with the implementation of the Company's Clean Energy Implementation Plan (CEIP) and Named Community Investment Fund.

MONTHLY RATE:

The energy charges of the individual rate schedules are to be surcharged by the following amounts:

Schedule 1, 7 & 8	\$0.00039 per kWh
Schedule 11, 12, 13, 17 & 18	\$0.00046 per kWh
Schedule 21, 22 & 23	\$0.00040 per kWh
Schedule 25 & 25I (First 500,000 kWh)	\$0.00028 per kWh
Schedule 25 & 25I (Next 5,500,000 kWh)	\$0.00028 per kWh
Schedule 25 & 25I (Over 6,000,000 kWh)	\$0.00000 per kWh
Schedule 31 & 32	\$0.00041 per kWh
Schedules 41-48	\$0.00171 per kWh

TERM:

On or before September 1, every year, the Company will file to adjust rates with an effective date of November 1.

SPECIAL TERMS AND CONDITIONS:

Service under this schedule is subject to the Rules and Regulations contained in this tariff. The above Rate is subject to increases as set forth in Tax Adjustment Schedule 58.

Issued September 1, 2024

Effective November 1, 2024

Issued by Avista Corporation
By

Patrick Ehrbar, Director of Regulatory Affairs



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Important Notice for Washington Electric and Natural Gas Customers August-September 2024

On August 30, 2024, Avista filed its annual Bonneville Power Administration (BPA) Residential Exchange Program, Wildfire Expense Balancing Account, Insurance Expense Balancing Account, Clean Energy Implementation Plan (CEIP), Low Income Rate Assistance Program (LIRAP), Climate Commitment Act (CCA) and Purchased Gas Cost Adjustment filings with the Washington Utilities and Transportation Commission (UTC or Commission). If approved, new rates would take effect Nov. 1, 2024 for electric customers and Nov. 15, 2024 for natural gas customers.

If approved, Avista's request is designed to increase electric revenues by \$22.9 million or 3.5% and would decrease natural gas revenues by \$42.3 million or 13.9%.

The first rate adjustment, the BPA Residential Exchange Program, provides a share of the benefits of the federal Columbia River power system to the residential and small farm customers of the investor-owned utilities in the Pacific Northwest, including Avista. Avista applies the benefits it receives to qualifying customers as a credit in their monthly electric rates. Due to fluctuations in usage, Avista rebated to customers a level of benefits that was lower than the level of benefits received from BPA. Through this filing Avista is seeking to slightly increase the level of benefits provided to qualifying customers in order to return the under-rebated balance. As a result, the proposed revenue decrease for these customers is approximately \$0.7 million, or 0.1%.

The second, Wildfire Expense Balancing Account, tracks the difference in wildfire expenses incurred by Avista to address the growing frequency of extreme and dangerous wildfires in Avista's service territory to the base expense approved by the Commission. The difference is rebated to or collected from customers through Schedule 88 – Wildfire Expense Balancing Account. The rate increase proposed reflects the higher level of expense incurred above the approved amount. If approved, Avista's request is designed to increase electric revenues by \$1.4 million or 0.2%.

The third, Insurance Expense Balancing Account, tracks the difference in insurance expenses incurred by Avista to the base expense approved by the Commission. The difference is rebated to or collected from customers through Schedule 66 – Insurance Expense Balancing Account for electric customers and Schedule 166 – Insurance Expense Balancing Account for natural gas customers. The rate change proposed reflects the higher level of expense incurred above the approved amount for electric and natural gas customers. If approved, Avista's request is designed to increase electric revenues by \$4.6 million or 0.7% and increase natural gas revenues by \$0.2 million or 0.1%.

The fourth is related to Avista's Low Income Rate Assistance Program (LIRAP), which provides bill assistance to income eligible customers with a household income less than or equal to 200% Federal Poverty Level (FPL) or 80% Area Median Income (AMI), whichever is greater. This rate increase is necessary to support the continuation and expansion of all LIRAP components, which includes both an income-based bill discount as well as offerings intended to help customers manage their past due balances, or arrearages. If approved, Avista's request is designed to increase electric revenues by \$15.3 million or 2.3% and increase natural gas revenues by \$6.8 million or 2.3%.

The fifth is related to Avista's Clean Energy Implementation Plan (CEIP), which recovers the costs required as a direct result of implementing its CEIP. These costs include a "Named Communities Investment Fund" (NCIF) as a specific action to be dedicated to the equitable distribution of energy and non-energy benefits and reduction in burdens to Vulnerable Populations and Highly Impacted Communities (Named Communities). In addition to the NCIF, this tariff recovers the costs for additional resources necessary for

implementation of Avista’s CEIP and associated conditions to the CEIP. If approved, Avista’s request is designed to increase electric revenues by \$2.1 million or 0.3%.

The sixth is related to the Climate Commitment Act cost recovery tariff. The CCA, passed by the Washington State legislature and enacted into law in 2021, implements a cap-and-invest program designed to meet emission reduction targets and reduce emissions by 95% of 1990 levels by 2050. Natural gas utilities must meet declining targets for greenhouse gas emissions (GHG) as compared to a baseline, which is the average emissions from 2015-2019. Beginning in 2023, natural gas utilities received no-cost emissions allowances to cover a portion of their GHG baseline, which 65% of the no-cost allowances had to be consigned to allowance auctions held by the Department of Ecology. Consignment of no-cost allowances to auction resulted in revenues back to the utility, which shall be used for the benefit of customers as determined by the Commission, including at minimum, eliminating any additional cost burden to low-income customers due to the implementation of the CCA. Locations connected to the natural gas system after July 25, 2021, are not eligible to receive any benefit from these revenues, per state law, hence the larger increases shown below. If approved, Avista’s request is designed to increase natural gas revenues by \$25.2 million or 8.3%.

The seventh is Avista’s Purchased Gas Cost Adjustment (PGA). PGAs are filed each year to balance the actual cost of wholesale natural gas purchased by Avista to serve customers with the amount included in rates. This includes the natural gas commodity cost as well as the cost to transport natural gas on interstate pipelines to Avista’s local distribution system. The proposed rate change is primarily due to lower forward wholesale natural gas prices than those currently included in rates and a reduction in the current surcharge amortization rate in effect from the prior year PGA. If approved, Avista’s request is designed to decrease natural gas revenues by \$74.5 million or 24.6%.

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 \$105.76 to \$109.58, an increase of \$3.82/month, or approximately 3.6%. Residential natural gas customers in Washington using an average of 66 therms per month would see their monthly bills change from \$100.86 to \$87.20, a decrease of \$13.66 per month, or approximately 13.5%, when compared to rates currently in effect.

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 Nov. 1, 2024)

Electric Service	Current Billing Rate	Proposed Change	Proposed Billing Rates
Basic Charge	\$9.00	\$0.00	\$9.00
First 800 kWhs/month	\$0.09996/kWh	\$0.00404/kWh	\$0.10400/kWh
Next 700 kWhs/month	\$0.11582/kWh	\$0.00404/kWh	\$0.11986/kWh
Over 1,500 kWhs/month	\$0.13535/kWh	\$0.00404/kWh	\$0.13939/kWh

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

Schedule No.	Rate Schedule	% Change in Billed Revenue
1/7/8	Residential	3.6%
11/12/13/17/18	General Service	3.4%
21/22/23	Large General Service	3.7%

25/25I	Ex. Lg. General Service	2.5%
31/32	Pumping Service	4.1%
41-48	Street and Area Lights	4.6%
Overall		3.5%

Natural Gas Rate Change

Proposed Schedule 101 Rates (effective Nov. 15, 2024)

Natural Gas Service	Current Billing Rate	Proposed Change	Proposed Billing Rates
Basic Charge	\$9.50	\$0.00	\$9.50
Avg. Sch 162/163 CCA Credit	(\$11.37)	(\$11.68)	(\$23.05)
First 70 therms/month	\$1.55645/therm	(\$0.03000)/therm	\$1.52645/therm
Over 70 therms/month	\$1.70829/therm	(\$0.03000)/therm	\$1.67829/therm

Proposed Natural Gas Rate Change by Schedule (effective Nov. 15, 2024)

Schedule No.	Rate Schedule	% Change in Billed Revenue
101	General Service	-14.2%
111/112	Large General Service	-18.6%
131/132	Interruptible Sales Service	7.9%
146	Transportation Service	61.8%
Overall		-13.9%

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. 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.

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