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IDAHO PUBLIC
UTILITIES COMMISSION

Avista Corp.

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

AVU-E-19-01

January 29, 2019

Diane Hanian, Secretary
Idaho Public Utilities Commission
Statehouse Mail
W. 472 Washington Street
Boise, Idaho 83720

RE: Petition for an Extension to File its 2019 Electric Integrated Resource Plan

Dear Ms. Hanian:

Attached for filing is an original and seven (7) copies of Avista Corporation, doing business as Avista Utilities ("Avista" or "Company") Petition for an Extension to File its 2019 Electric Integrated Resource Plan (IRP).

If you have any questions regarding this filing, please contact James Gall at 509-495-2189 or John Lyons at 509-495-8515.

Sincerely,

A handwritten signature in blue ink, reading "Linda Gervais", is positioned above the typed name and title.

Linda Gervais
Sr. Manager, Regulatory Policy
Avista Utilities
509-495-4975
linda.gervais@avistacorp.com

1 DAVID J. MEYER
2 VICE PRESIDENT AND CHIEF COUNSEL FOR
3 REGULATORY AND GOVERNMENTAL AFFAIRS
4 AVISTA CORPORATION
5 1411 E. MISSION AVENUE
6 P.O. BOX 3727
7 SPOKANE, WASHINGTON 99220
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10 BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

11

12 IN THE MATTER OF THE PETITION OF) CASE NO. AVU-E-19- 01
13 AVISTA CORPORATION FOR AN)
14 EXTENSION TO FILE ITS 2019)
15 ELECTRIC INTEGRATED RESOURCE PLAN) PETITION OF
16) AVISTA CORPORATION
17)
18 _____

19 I. INTRODUCTION

20 Avista Corporation, doing business as Avista Utilities
21 (hereinafter Avista or Company), at 1411 East Mission
22 Avenue, Spokane, Washington, respectfully petitions the
23 Idaho Public Utilities Commission (Commission) to issue an
24 order authorizing a six-month extension of time for filing
25 its 2019 Electric Integrated Resource Plan (IRP).

26 The Company requests that this filing be processed
27 under the Commission's Modified Procedure rules through the
28 use of written comments.

1 Communications in reference to this Application should
2 be addressed to:

3 David J. Meyer, Esq.
4 Vice President and Chief Counsel for
5 Regulatory & Governmental Affairs
6 Avista Corporation
7 P.O. Box 3727
8 MSC-27
9 1411 E. Mission Ave
10 Spokane, WA 99220-3727
11 Phone: (509) 495-4316
12 David.Meyer@avistacorp.com

13
14 Linda M. Gervais
15 Senior Manager, Regulatory Policy
16 Avista Utilities
17 P.O. Box 3727
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19 1411 E. Mission Ave
20 Spokane, WA 99220-3727
21 Phone: (509) 495-4975
22 Linda.Gervais@avistacorp.com
23

24 **II. BACKGROUND**

25 The Company submits the IRP to the Commission every two
26 years as outlined in Case No. U-1500-165, Order No. 22299.
27 Avista's next IRP is due to be filed with the Commission on
28 or before August 31, 2019. The IRP is a methodology for
29 identifying and evaluating various resource options and is
30 a process to establish a plan of action for resource
31 decisions. Avista uses AURORA_{xmp} for electric market price
32 forecasting, resource valuation and for conducting Monte-

1 Carlo style risk analyses of the electric market place. This
2 model fills future capacity and energy (physical/renewable)
3 deficits using an efficient frontier approach to evaluate
4 quantitative portfolio risk versus portfolio cost while
5 accounting for environmental laws and regulations.

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

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

16 **III. SUPPORT FOR EXTENSION**

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

1 and 100% carbon free energy serving Washington customers by
2 2045. In addition to Senate Bill 5116, House Bill 1113, would,
3 if approved, increase the Washington State greenhouse gas
4 targets to meet the Paris Climate Accord goals. House Bill
5 1110 may impact our industry through increased electrification
6 of transportation, which could also impact the regional
7 electric market. A comprehensive cap and trade proposal is
8 also expected to be introduced in Washington soon.

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

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

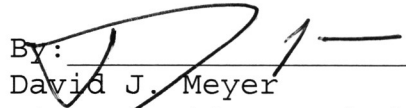
1 In addition, Avista discussed the idea to extend the
2 filing date by six-months with Commission Staff, they did not
3 object to our request.

4 IV. CONCLUSION

5 WHEREFORE, Avista respectfully requests the
6 Commission issue its order approving a six-month extension
7 of the Company's 2019 Electric IRP, with this Petition
8 being processed under Modified Procedure through the use
9 of written comments.

10 Dated at Spokane, Washington this 29 day of January
11 2019.

12
13 AVISTA CORPORATION

14
15 By: 
16 David J. Meyer
17 Vice President and Chief Counsel for
18 Regulatory and Governmental Affairs