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March 16, 2020

Paul Kjellander, President
Idaho Public Utilities Commission
P.O. Box 83720
Boise, ID 83720

**RE: Request for a Public Hearing on Avista's 2020 Electric Integrated Resource Plan,
Case No. AVU-E-19-01**

President Kjellander and Commissioners of the Idaho Public Utilities Commission:

The Idaho Public Utilities Commission ("IPUC") recently opened a case to consider the 2020 Electric Integrated Resource Plan ("IRP") for Avista Corporation, doing business as Avista Utilities ("Avista"). The Idaho Conservation League ("ICL") respectfully requests the IPUC hold a public hearing in this case in Sandpoint, Idaho. We are mindful that the IPUC's consideration of this request will come at a time when the IPUC must also consider the developing situation concerning the spread of COVID-19. Public health and safety must be the top priority. Accordingly, we recommend the IPUC consider issuing a decision on this request that allows for the flexibility and the time to set a public hearing date later this spring or summer, should the circumstances make a public hearing safe and appropriate at that time.

Since 1973, ICL has been Idaho's leading voice for clean water, clean air, and wilderness – values that are the foundation for Idaho's extraordinary quality of life. As a 501(c)(3) nonprofit organization, ICL works to protect these values through public education, outreach, advocacy, and policy development. ICL also regularly participates and intervenes in electric utility rate cases and other matters before the IPUC to advocate for affordable, reliable, and clean electricity for all Idahoans. ICL is Idaho's largest state-based conservation organization and represents over 35,000 supporters, many of whom have a deep personal interest in protecting Idaho's human health and environment through the integration of clean energy resources and energy efficiency.

ICL has a direct and substantial interest in this proceeding and in the outcome of Avista's IRP. ICL's Sandpoint field office purchases electric service from Avista, as a small commercial customer. In addition, ICL represents approximately 1,000 members who are residential customers of Avista and who care deeply about the future of their electric service. On behalf of the Idaho Conservation League and its members, I am requesting the IPUC hold a customer public hearing, pursuant to IDAPA 31.01.01.203. See also IDAPA 31.01.01.241.04.b.

Avista's electric customers in Idaho, for the most part, do not have the freedom to choose from whom they buy their electricity. If an electric customer in Avista's Idaho service territory is unhappy with her service, she cannot "vote with her pocketbook" by seeking service from another electric provider. As a monopoly, Avista is free from competition in the electric market that would incentivize Avista to adjust and provide electric service based on their customers' changing needs and interests. To account for the absence of market competition, the IPUC provides critical regulatory oversight of utilities like Avista and helps ensure Avista makes decisions and provides service in the public interest. But, deciphering the public interest of electric customers over 400 miles and a time zone away is no small task, which is why customers in North Idaho need frequent and different types of opportunities to ensure the general direction of their utility aligns with their interests, concerns, and needs.

Customer public hearings offer electric users in North Idaho a different, but important, means of communicating with Avista that complements other alternatives, such as written, electronic, or telephonic comments. Hearings provide a discreet opportunity for public participation that focuses public attention. Hearings can also be a more satisfying form of public participation because customers offering testimony know they have been heard directly by Avista and IPUC staff, whereas it can be less certain how much consideration or attention a comment filed electronically receives. For these reasons, Avista and the IPUC might hear from electric customers at a hearing they might not otherwise hear from through any other means. And, this is an important time for Avista and the IPUC to be hearing from electric users in North Idaho.

The electric utility industry is undergoing massive changes, and Idaho electric customers ought to be informed and have a say in the future of the electricity for which they pay. Much of our electric infrastructure is aging, some of which can no longer provide cost effective and safe electricity for Idaho customers. At the same time, state-of-the-art electric-generating technologies are rapidly coming online to supplant their retiring predecessors. Integrated Resource Plans provide a critical opportunity for customers to learn about this transition and to weigh in (more or less technically) on how they would prefer their utility company navigate this transition. Indeed, electric customers across Idaho are increasingly seeking out these forums, especially in Sandpoint.

Avista's electric customers in Idaho have shown a growing desire for more opportunities to communicate their interests to Avista and the IPUC. As you may recall, 18 Avista customers in Idaho testified during the IPUC's November 2, 2017 telephonic public hearing on Avista's 2017 IRP, in addition to the written comments that were also submitted in this case. The contrast between Avista's 2017 IRP to Avista's 2020 IRP, shows public hearings create important opportunities for Avista to listen and respond to feedback from electric customers in Idaho.

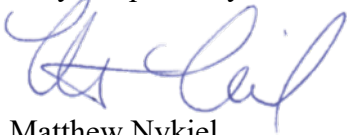
ICL appreciates the IPUC's commitment to make itself available to utility customers in North Idaho and respects the costs associated with doing so. And, we thank the IPUC for considering our request for a public hearing during Avista's last IRP cycle and for facilitating a telephonic public hearing. For Avista's 2020 IRP, Sandpoint would be an appropriate and effective location for the IPUC to conduct a public hearing.

To our knowledge, the IPUC has never held a public hearing in Sandpoint regarding any of Avista's previous IRPs. This matters because Sandpoint and the surrounding rural communities are further removed from Avista's Spokane headquarters. Consequently, it is more challenging for Avista customers in this part of Idaho to engage with their utility, in-person, on issues that are important to them. For example, if an electric customer from Sandpoint wanted to attend, in-person, one of Avista's IRP Technical Advisory Committee meetings, she would have to make a three-hour, round-trip drive to do so because the meetings are always held in Spokane. We understand that the reality of these meetings makes it challenging to conduct them anywhere other than Avista's Spokane headquarters, but the IPUC can help acknowledge this reality by offering a public hearing on this IRP, where Idaho customers can communicate directly with Avista, as well as the IPUC itself.

Thank you for your time and consideration of ICL's request for a public hearing in Sandpoint, regarding Avista's 2020 Electric IRP. Again, we are mindful that the IPUC's consideration of this request will come at a time when the IPUC must also consider the developing situation concerning the spread of COVID-19. Public health and safety must be the top priority. Accordingly, we recommend the IPUC consider issuing a decision on this request that allows for the flexibility and the time to set a public hearing date later this spring or summer, should the circumstances make a public hearing safe and appropriate at that time.

Thank you, again, for your time and consideration.

Very Respectfully,



Matthew Nykiel
Conservation Associate

c: Diane Hanian, Commission Secretary, Idaho Public Utilities Commission
Ed Jewell, Deputy Attorney General, Idaho Public Utilities Commission
Linda Gervais, Sr. Manager, Regulatory Policy, Avista
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