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IDAHO PUBLIC  
UTILITIES COMMISSION

Diane Hanian  
Commission Secretary  
Idaho Public Utilities Commission  
PO Box 83720  
Boise, ID 83720

*Submitted via email to: [diane.hanian@puc.idaho.gov](mailto:diane.hanian@puc.idaho.gov), [david.meyer@avistacorp.com](mailto:david.meyer@avistacorp.com), and [linda.gervais@avistacorp.com](mailto:linda.gervais@avistacorp.com)*

January 6, 2020

**RE: Case No. AVU-E-19-12**

Dear Ms. Hanian:

Since 1973, the Idaho Conservation League (“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 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.

Attached, please find my comments on behalf of the Idaho Conservation League regarding Avista Corporation’s Application Requesting to Modify Schedule 95 to Revise the Company’s Voluntary Renewable Energy Program.

Please do not hesitate to contact me at (208) 265-9565 or [mnykiel@idahoconservation.org](mailto:mnykiel@idahoconservation.org) if you have any questions regarding our comments or if we can provide you with any additional information on this matter.

Thank you for your time and consideration.

Sincerely,

A handwritten signature in blue ink, appearing to read "M. Nykiel".

Matthew Nykiel  
Conservation Associate

## **Customer Education**

To improve Avista's proposed "My Clean Energy Program" ("Program"), we request Avista provide and more accessible and understandable information to its Idaho customers specifically explaining what portion of Avista's distributed electricity is produced from renewable sources and what portion is produced from fossil fuel sources. Idaho customers need this information to determine how much to pay into the Program to correctly offset their fossil fuel emissions. We request Avista make this information easily accessible within Avista's materials that explain and describe the Program. Unfortunately, the information Avista currently provides about its energy mix is three years out-of-date and is not specific to its Idaho customers. See <https://www.myavista.com/about-us/our-company/about-our-energy-mix>. We request Avista simply state to its Idaho customers the percent of electricity they receive that comes from fossil fuels and the percent that comes from renewable resources.

Information about how much renewable versus fossil fuel electricity Avista distributes to its Idaho customers should also be updated according to changes to Avista's portfolio of electric generating resources and differences in how Avista dispatches these resources between its Idaho customers and Washington customers.

For example, as Avista proceeds to produce more clean energy according to Avista's corporate climate change commitment and according to Washington State law, Idaho customers need to understand whether or not that additional clean energy is being distributed to and paid for by Idaho customers. If Idahoans share ownership in or use of the clean energy resource additions, Idaho customers could reduce their investment into the Program. But, if the costs of Avista's clean energy resource additions are not incorporated into Idaho customer rates or if the clean energy is not distributed to Idaho customers, then Idahoans will need to pay more to the Program to correctly offset their fossil fuel use. The share of clean energy that is distributed to Idaho customers as distinguished from Washington State customers is necessary for Idahoans to make informed, consumer-driven decisions, especially when participating in the Program. We hope that the intention behind Avista's proposed "value calculator" is to function to help customer determine exactly how much they must pay into the Program to correctly offset their fossil fuel use.

Similarly, Avista's Idaho customers must understand how Avista accounts for and manages the Renewable Energy Credits (RECs) produced by Avista's renewable energy resources. We request that in Avista's materials describing the Program, Avista explain how it manages Idaho's share of RECs produced from Avista-owned energy resources. For example, according to information provided during Avista's 2019 Intergrated Resources Plan development process, Avista's Idaho customers have a stake in approximately 200 average megawatts of hydro-electric RECs every year. See <https://www.myavista.com/-/media/myavista/content-documents/about-us/our-company/irp-documents/2020-electric-irp-tac-5-presentations.pdf?la=en> at pdf page 43. But, if Avista chooses to sell those RECs to Washington customers or over the open market, Avista's Idaho customers would have to pay more into the Program to correctly offset their fossil fuel emissions.

We are not aware of any public materials that adequately inform Idaho customers how Avista accounts for and manages the RECs that are produced as a result of the energy generated to meet the demand in Avista's Idaho service territory. We request Avista make this information easily accessible within Avista's materials that describe and explain the Program. This information is also necessary for Idaho customers to make informed, consumer-driven decisions.

### **Regional REC Preference**

We request Avista source its Regional Blocks with a preference for RECs sourced from Idaho. We also request that whatever Regional Blocks cannot be sourced from Idaho be sourced from the Northwest Region of the United States, excluding California and British Columbia. As Avista's Idaho customers participate in the Program, the benefits of supporting renewable energy development (job growth, air quality, etc.) based on their contributions will better accrue to Idahoan customers the closer those RECs are sourced.

### **Implementation**

In Avista's application at page 6, Avista states:

"In order to successfully implement the proposed changes and deliver on customer expectations, Avista will modify the language and positioning on the Company's website to better illustrate the value of the program. This includes the addition of a value calculator, modifications to the online enrollment process to illustrate the program's options, and back-end system changes...Avista also plans on distributing ongoing communications to our customers in order to promote broader awareness of the program, as well as regular communications to current program participants that will include information about the renewable projects they help support."

We support Avista's intention to improve its communications, education, and facilitation of the Program, but Avista only provides a vague idea of how it intends to do all this, which prevents the public, the Idaho Public Utilities Commission ("IPUC"), and IPUC Staff from providing helpful comments and feedback. In particular, we would be interested to learn more about and to comment on Avista's specific proposals for modifying the language it uses to describe and market the Program. It seems to us that the absence of these details in Avista's application, risks Avista missing an important opportunity to get customer input before it implements the language changes.

We would welcome an opportunity to learn more about how Avista proposes to better illustrate the value of the Program and an opportunity to comment on a more fully presented proposal.

### **Surplus Revenue**

We request Avista indicate the total amount of funding it has awarded in solar grants from the Program's surplus funds, since 2002, to Idaho-based projects as compared to Washington State-based projects. We also request Avista explain the process by which it determines how much of the surplus funding Avista's Idaho service territory is entitled to as compared to Avista's Washington service territory.