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Attorney for the Commission Staff

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF AVISTA)
CORPORATION'S FILING PROPOSING) **CASE NO. AVU-E-20-14**
MODIFICATIONS TO TARIFF SCHEDULE NO.)
95)
) **COMMENTS OF THE**
) **COMMISSION STAFF**

STAFF OF the Idaho Public Utilities Commission, by and through its Attorney of record, Dayn Hardie, Deputy Attorney General, submits the following comments.

BACKGROUND

On December 4, 2020, Avista Corporation dba Avista Utilities (“Company”) submitted a Tariff Advice requesting to modify Electric Service Schedule No. 95—My Clean Energy Program (“Schedule No. 95” or “Program”). The Company requests an effective date of February 15, 2021.

At the Commission’s January 26, 2021 decision meeting, the Commission’s Staff recommended the Commission suspend the proposed effective date and process the Tariff Advice as a formal case because the Tariff Advice would make programmatic changes that warrant public comment. The Commission found it appropriate to process this Tariff Advice as an application (the “Application”) using Modified Procedure. *See* Rule 134.02, IPUC Rules of Procedure.

The Company seeks to modify Schedule No. 95 to offer customers in the My Clean Energy Program a third option to purchase clean energy. The Company proposes to add a 100% Renewable Option which would allow customers to purchase 1 kilowatt-hour (“kWh”) of renewable power from a regional source in the Western Interconnection to offset each kWh billed to the customer’s selected meter. Each kWh purchased under this option would cost \$0.01 in addition to the customer’s regular bill. The number of kWhs purchased each month would correspond directly to a customer’s actual usage each month.

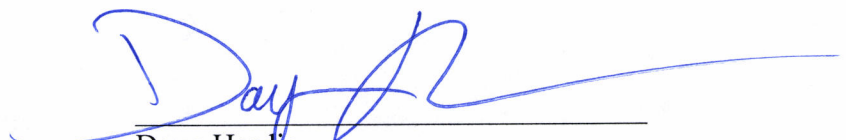
STAFF ANALYSIS

The Company continuously evaluates its voluntary renewable My Clean Energy Program. Through customer feedback, an additional opportunity to align Program options with customer sentiment was identified. Staff supports the Company’s request to expand the Program offering to include a 100% Renewable Option, which eliminates the need for customers to estimate monthly block purchases from existing block options and simplifies the buying process to match monthly energy consumption. Staff confirmed that costs of participation in My Clean Energy are contained within the Program and tracked separately to avoid cost shifts to non-participants. The Company expects the billing system that can support the 100% match option to be complete by the end of March 2021.

STAFF RECOMMENDATION

Staff recommends the Commission approve changes to the My Clean Energy Program to include the proposed 100% Renewable Option.

Respectfully submitted this 18th day of February 2021.



Dayn Hardie
Deputy Attorney General

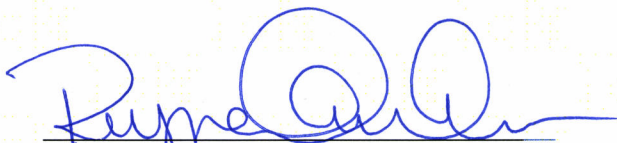
Technical Staff: Rachelle Farnsworth

i:umisc/comments/avue20.14dhrf comments

CERTIFICATE OF SERVICE

I HEREBY CERTIFY THAT I HAVE THIS 18th DAY OF FEBRUARY 2021, SERVED THE FOREGOING **COMMENTS OF THE COMMISSION STAFF**, IN CASE NO. AVU-E-20-14, BY E-MAILING A COPY THEREOF TO THE FOLLOWING:

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SECRETARY