

DECISION MEMORANDUM

TO: COMMISSIONER KJELLANDER
COMMISSIONER RAPER
COMMISSIONER ANDERSON
COMMISSION SECRETARY
COMMISSION STAFF

FROM: DAYN HARDIE
DEPUTY ATTORNEY GENERAL

DATE: NOVEMBER 19, 2021

SUBJECT: IN THE MATTER OF AVISTA’S ANNUAL COMPLIANCE FILING TO
UPDATE THE LOAD AND GAS FORECASTS IN THE INCREMENTAL
COST INTEGRATED RESOURCE PLAN AVOIDED COST MODEL TO
BE USED FOR AVOIDED COST CALCULATIONS; CASE NO. AVU-E-21-
14.

On October 13, 2021, Avista Corporation (“Company”) filed a compliance filing requesting the Commission issue an order accepting its updated load forecast, natural gas price forecast, and contracts used as inputs to calculate its incremental cost Integrated Resource Plan avoided cost rates, as required by Order Nos. 32697 and 32802. The Company requested its Filing be processed by Modified Procedure.

On November 5, 2021, the Commission issued a Notice of Application and established a November 26, 2021 public comment deadline and a December 3, 2021 Company reply deadline. Order No. 35220.

BACKGROUND

The Company included the same load forecast submitted in last year’s Annual Load and Natural Gas Forecast Update, Case No. AVU-E-20-10, with its Application. An updated load forecast, along with the most recent natural gas forecast and updated contracts are used as an input into the Company’s incremental cost integrated resource plan avoided cost model to ensure accurate avoided cost rates for new PURPA contracts. Through production requests, Staff discovered that the load forecast filed with the Application was the same forecast submitted in last year’s filing but has developed a more recent load forecast. Staff also learned it was not submitted

with the Company's Application because the Annual Load and Natural Gas Forecast Update has not been fully vetted through the Company's internal processes.

Staff has discussed this with the Company, which requested additional time to review the updated forecast before submitting it to the Commission. The Company has committed to submitting it by December 3, 2021. Staff and the Company agree the procedural schedule should be amended to allow additional time for the Company to provide the updated forecast. The Parties agree an amended schedule will allow for a final order to issue before January 1, 2022.

STAFF RECOMMENDATION

Staff recommends that the Commission vacate the comment and Company reply deadlines established in Order No. 35220 and issue a Notice of Amended Comment Deadlines establishing a December 14, 2021 public comment deadline and December 21, 2021 Company reply deadline.

COMMISSION DECISION

Does the Commission wish to vacate the comment and Company reply deadlines established in Order No. 35220 and issue a Notice of Amended Comment Deadlines establishing a December 14, 2021 public comment deadline and December 21, 2021 Company reply deadline?



Dayn Hardie
Deputy Attorney General