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IDAHO PUBLIC
UTILITIES COMMISSION

Avista Corp.

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May 12, 2022

Jan Noriyuki, Secretary
Idaho Public Utilities Commission
11331 W. Chinden Blvd. Bldg. 8, Ste. 201-A
Boise, Idaho 83714

RE: Case No. AVU-E-22-02 Capacity Deficiency Period for the Avoided Cost Calculations

Dear Ms. Noriyuki:

Avista Corporation dba Avista Utilities (Avista or the Company) provides the following reply comments pursuant to Order No. 35347 in Case No. AVU-E-22-02, regarding Avista's compliance filing to update and establish its capacity deficiency period to be used for avoided cost calculations. The comments contained herein are in response to the comments filed by Commission Staff on May 5, 2022.

Included with these reply comments is an updated Confidential Load and Existing Resource Balances (L&R) spreadsheet with the following changes recommended by Commission Staff:

1. Use of the most recent load forecast from February 2022.
2. Update of the Colstrip Losses adjustment through 2036 for Idaho's 35% pro rata share.
3. The use of 2034 and 2036 for the respective retirement dates for Colstrip Units 3 and 4.
4. L&R showing annual and monthly deficits.

The capacity deficiency period has shifted from November 1, 2026, as included in the original filing, to December 1, 2026, with a shortfall of 155 MW. The reason for the change is primarily due to the inclusion of Colstrip beyond December 1, 2026, but also the updated load forecast from February 2022 and including the monthly L&R position are contributing factors. December 1, 2026 should be the date used for the capacity deficiency period.

Lastly, Avista supports Staff's recommendation to open a generic docket to re-evaluate when the capacity deficiency date case should be filed.

Please direct any questions regarding this filing to John Lyons at 509-495-8515.

Sincerely,

/s/ Shawn Bonfield

Shawn Bonfield
Sr. Manager of Regulatory Policy & Strategy
Avista Utilities
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Enclosure

**BEFORE THE
IDAHO PUBLIC UTILITIES COMMISSION**

CASE NO. AVU-E-22-02

Attachment - Load and Existing Resource Balances (L&R) spreadsheet -
to Avista Corporation's May 12, 2022, reply comments

is **CONFIDENTIAL**