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Avista Corp.

1411 East Mission P.O. Box 3727
Spokane, Washington 99220-0500
Telephone 509-489-0500
Toll Free 800-727-9170

September 14, 2022

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

Re: Case No. AVU-E-22-11– Reply Comments of Avista

Dear Commission Secretary:

Avista Corporation, dba Avista Utilities (Avista or Company), respectfully submits the following reply comments in response to Commission Staff’s September 7, 2022 written comments. Avista appreciates Staff’s time and thorough review of its annual Power Cost Adjustment (PCA) filing. In general, the Company finds Staff’s comments to be agreeable, but has one point of clarification on the Energy Imbalance Market (EIM).

Staff has recommended “the Commission authorize EIM incremental expenses to be included in the PCA up to the benefits realized from the EIM until the Company’s next rate case when these costs can be reviewed and included in base rates.”¹ While the Company is not opposed to including incremental EIM O&M expenses through base rates in its next general rate case, the Company currently has authority, per Case No. AVU-E-21-01 Order No. 35156, that “effective with the expected “go live” March 1, 2022, date, the Company will begin to reflect Idaho’s share of incremental EIM O&M expenses through the PCA up to Idaho’s share of EIM benefits that also will flow through the PCA.”²

¹ Staff’s Comments, p. 5.

² Order No. 35156, p. 5, section 6 E.

The Company's preference at this time would be to continue this methodology of incremental EIM O&M expenses and EIM benefits flowing through the PCA in order to match such costs going forward.

Please direct any questions regarding this filing to Kaylene Schultz at (509) 495-2482.

Sincerely,

/s/ Patrick D. Ehrbar

Patrick D. Ehrbar
Director of Regulatory Affairs

