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IDAHO PUBLIC
UTILITIES COMMISSION

Avista Corp.

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

April 15, 2024

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

RE: Case No. AVU-E-24-03 – Reply Comments of Avista Utilities

Commission Secretary:

On April 8, 2024, Commission Staff submitted comments in the above-referenced case in which Staff recommended (i) against approval of the proposed amendment that would relieve the QF from its obligation to pay a use-of-facilities charge during periods of extended shutdowns, and (ii) that Avista meet with Staff to discuss the development of a tariff to address recovery of use-of-facility costs. Avista Corporation, doing business as Avista Utilities (Avista), appreciates Commission Staff's Comments.

Avista understands Staff's concern regarding the recovery of costs of the facilities that are the subject of the use-of-facilities charge. The proposed amendment to require Stimson to pay the use-of-facilities charge only when Stimson operates its QF attempts to strike a balance that relieves the QF from paying the use-of-facilities charge when its QF is shutdown for extended periods of time while at the same time requiring payment when the QF does operate. The amendment attempts to find a solution that preserves both the QF's ability to generate and sell its output, and the utility's ability to collect the use-of-facilities charge if and when the QF does generate. The inclusion of a minimum collection of \$8,448¹ does not relieve the economic impact faced by the QF when it does not generate. While this amount is not material to the overall PCA, it does create a significant economic consideration for the QF's operations. The petition submitted by the Company attempts to relieve the burden for the QF with a minimal impact to the PCA.

In response to Staff's recommendation that the Company meet with Staff to explore the potential development of a tariff schedule for recovery of use-of-facilities related costs, Avista is open to meeting with Staff on this issue. However, Avista notes that the use-of-facilities arrangement at

¹ Per the Company's response to Staff PR_001, it is estimated that only \$2,620.06 impacts the Idaho PCA after allocations between Washington and Idaho, and cost sharing (90% customer, 10% Company).

issue in this proceeding is a unique arrangement. Avista does not anticipate any additional similar arrangements in the future. Accordingly, a tariff schedule for recovery of use-of-facility costs is not necessary at this time.

Sincerely,

/s/ Paul Kimball

Paul Kimball
Manager of Compliance & Discovery
Avista Utilities
509-495-4582
paul.kimball@avistacorp.com