RECEIVED 2020 JUN 15 PM 12: 17 IDAHO PUBLIC STILITIES COMMISSION

Michael G. Andrea (ISB No. 8308) Senior Counsel Avista Corporation 1411 East Mission, MSC-17 Spokane, WA 99202 Phone: (509) 495-2564 Facsimile: (509) 777-5468 Email: michael.andrea@avistacorp.com

Attorney for Avista Corporation

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

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IN THE MATTER OF COMMISSION STAFF'S PETITOIN TO UPDATE INPUTS TO THE COLSTRIP METHOD AND TO DISCONTINUE THE SUMAS METHOD

NO. AVU-E-20-04/1PC-E-20-24

COMMENTS OF AVISTA CORPORATION

Avista Corporation ("Avista" or "Company"), in accordance with RP 201, et seq., the applicable provisions of the Public Utility Regulatory Policies Act of 1978 ("PURPA"), and the Idaho Public Utilities Commission's ("Commission") Notice of Modified Procedure in this matter, Order No. 34674, hereby respectfully submits the following Comments.

On May 14, 2020, Commission Staff filed a Petition requesting a Commission Order to implement an updated avoided cost based on the Colstrip Method for determining the adjustable portion of avoided cost rates under PURPA. The Colstrip Method was established by the Commission in Order No. 28708.

The Company has reviewed Commission Staff's revision to the adjustable portion of the avoided cost rate for existing PURPA contracts that utilize the Colstrip Method. Avista agrees that the calculations used by the Staff for Avista are consistent with Commission Order No. 28708. Avista agrees the Commission should discontinue pricing requirements specific to the Sumas Method.

Respectfully submitted this 15th day of June 2020.

AVISTA CORPORATION

<u>/s/ Michael G. Andrea</u> Michael G. Andrea Senior Counsel

Page - 2 COMMENTS OF AVISTA CORPORATION