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IDAHO PUBLIC
UTILITIES COMMISSION

Avista Corp.

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Toll Free 800-727-9170

December 20, 2018

Diane Hanian, Secretary
Idaho Public Utilities Commission
W. 472 Washington Street
Boise, Idaho 83720

Re: AVU-G-18-07

Dear Ms. Hanian:

In Compliance with Order No. 34178 in Case No. AVU-G-18-07, enclosed for electronic filing with the Commission is Avista Corporation's dba Avista Utilities ("Avista" or "the Company") 2019 Gas Standards Manual ("Manual"). In its Final Order, the Commission found that:

...it is appropriate for the Company to add a tariff provision that requires the Company to furnish the Commission with an electronic copy of its Gas Standards Manual and the Standard Operating Procedures for the Gas Meter Measurement Performance Program upon request or whenever substantive changes are made.

Avista filed the requested tariff sheets to include the above provision on November 19, 2018, and as such is providing the 2019 updates to its Gas Standards Manual. Due to the voluminous nature of this Manual, the first 31 pages of the document provide a summary of the changes made.

There have been no updates to the Company's Standard Operating Procedures for the Gas Meter Measurement Performance Program at this time; revisions to this document are anticipated during calendar year 2019 and will be filed once available.

If you have any questions regarding this filing, please contact Jaime Majure at (509) 495-7839
or jaime.majure@avistacorp.com.

Sincerely,

/s/Linda Gervais/

Linda Gervais
Senior Manager, Regulatory Policy
Avista Utilities
509-495-4975
linda.gervais@avistacorp.com

Enclosure



Bentley

Removed **BR** Please provide the analysis you relied on to determine Avista will pay Clearwater Paper no more under the 2018 Agreement, than they did under the 2013 Agreement.

Removed **Y** Please provide the customer impact (revenue requirement) for the following three alternatives using the most recent 12 months that Avista has data available: under the 2013 Agreement, under the 2018 Agreement, and under IRP-based avoided cost pricing. Please provide all the workpapers associated with the analysis with formula intact.

Added **B** Please estimate the cost impact of replacing the current 2013 Agreement with a.) the 2018 Agreement and b.) an agreement based on IRP-based avoided cost pricing. For part b, please provide a detailed explanation of the calculation of the IRP-based avoided cost price. These analyses may be based on either test-year data from the last general rate case or data for a recent consecutive 12-month period. Please provide workpapers in Excel, with formulae intact.