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Attorney for the Commission Staff

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF THE APPLICATION OF)	
AVISTA CORPORATION FOR A)	
DETERMINATION OF 2016-2017 ENERGY)	CASE NO. AVU-E-18-12
EFFICIENCY EXPENSES AS PRUDENTLY)	
INCURRED)	
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IN THE MATTER OF THE APPLICATION OF)	
AVISTA CORPORATION FOR A)	CASE NO. AVU-G-18-08
DETERMINATION OF 2014-2017 NATURAL)	
GAS ENERGY EFFICIENCY EXPENSES AS)	COMMENTS OF THE
PRUDENTLY INCURRED)	COMMISSION STAFF
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STAFF OF the Idaho Public Utilities Commission, by and through its Attorneys of record, Edward J. Jewell and Matt Hunter, Deputies Attorney General, submits the following comments.

BACKGROUND

On November 16, 2018, Avista Corporation (“Company”) filed two Applications with the Commission. The first Application, Case No. AVU-G-18-08, requested the Commission determine whether the Company prudently incurred \$2,899,525 in natural gas energy efficiency

expenses from January 1, 2014 through December 31, 2017. The second Application, Case No. AVU-E-18-12, requested the Commission determine whether the Company prudently incurred \$22,719,204 in electric energy efficiency expenses in 2016 and 2017.

The Commission issued Notices of Application and set intervention deadlines for both cases in December 2018. Order Nos. 34210 and 34222. Over the next nine months, Commission Staff worked closely with the Company to determine whether the Company's energy efficiency expenses were prudently incurred. Staff performed two on-site audits and filed multiple rounds of production requests.

On September 17, 2019, the Commission issued Notices of Modified Procedure for Case Nos. AVU-E-18-12 and AVU-G-18-08, setting identical deadlines for comments and reply comments in both cases. The comment deadline was November 18, 2019, and the reply comment deadline was December 3, 2019. Order Nos. 34444 and 34446.

On November 5, 2019, Commission Staff began settlement negotiations with the Company at the Company's request. Staff notified the Commission Secretary of the settlement negotiations, as required by Commission Procedural Rule 272, IDAPA 31.01.01.272, and requested the Commission extend the deadlines for an additional three weeks to facilitate the settlement negotiations. On November 18, 2019, the Commission issued two Notices of Comment Deadlines, setting a December 9, 2019 comment deadline and a December 23, 2019 reply comment deadline in both cases. Order Nos. 34489 and 34487.

STAFF ANALYSIS

Staff and the Company have reached a settlement in principle, and Staff believes the settlement will be ready to file soon. Staff believes a settlement with the Company will potentially address reporting and program management problems that have made the Company's prudence cases challenging for a number of years. Staff will seek a just and reasonable settlement and, if reached, request the Commission set new comment deadlines for the parties and the public to provide feedback on the proposed settlement.

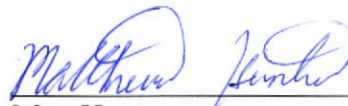
STAFF RECOMMENDATION

Staff recommends the Commission authorize a second round of comments after a settlement with the Company has been reached and presented to the Commission.

Respectfully submitted this ^{9th} day of December 2019.



Edward J. Jewell
Deputy Attorney General



Matt Hunter
Deputy Attorney General


i:umisc:comments/avue18.12_avug18.8ejmh comments

CERTIFICATE OF SERVICE

I HEREBY CERTIFY THAT I HAVE THIS 9th DAY OF DECEMBER 2019, SERVED THE FOREGOING **COMMENTS OF THE COMMISSION STAFF**, IN CASE NOS. AVU-E-18-12 AND AVU-G-18-08, BY MAILING A COPY THEREOF, POSTAGE PREPAID, TO THE FOLLOWING:

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SECRETARY