

DECISION MEMORANDUM

TO: COMMISSIONER KJELLANDER
COMMISSIONER RAPER
COMMISSIONER ANDERSON
COMMISSION SECRETARY
COMMISSION STAFF
LEGAL

FROM: JOHN R. HAMMOND JR.
DEPUTY ATTORNEY GENERAL

DATE: April 24, 2020

**SUBJECT: IN THE MATTER OF AVISTA'S PETITION FOR AN EXTENSION TO
FILE ITS 2020 ELECTRIC INTEGRATED RESOURCE PLAN; CASE NO.
AVU-G-20-01**

On January 15, 2020, Avista Corporation ("Company") filed a Petition seeking an extension of the August 31, 2020, filing date for the Company's 2020 Natural Gas Integrated Resource Plan ("IRP").

THE PETITION

The Company requests a six-month extension of its August 31, 2020, IRP filing deadline. *Petition* at 2. The Company states there are numerous, potentially significant legislative proposals in Washington and Oregon that if passed, would have major impacts on natural gas planning, including Washington's Senate Clean Energy Transformation Act ("CETA") or Senate Bill 5116, Washington House Bills 1257 and 1444, and Oregon Senate Bill 98. *Id.* The Company states final rules and expectations for natural gas distribution utilities due to these bills are expected to take several more months to create and implement, which will affect the ability to fully realize the impacts on the IRP process. *Id.*

The Company represents CETA requires 100% carbon-free electricity serving Washington customers by 2045 and references renewable natural gas investments for distribution or consumption. *Id.* at 3. Washington House Bills 1257 and 1444 call for new energy efficiency requirements with new requirements for buildings and appliance standards that the Company alleges and will affect its conservation potential assessment ("CPA") going forward, taking effect by 2022. *Id.* The Company asserts that a set of renewable natural gas and fuels bills,


including Oregon SB 98, and Washington HB 1257 opens up a path forward to acquire these supply-side resources as a means to reduce carbon emissions. The Company claims that because of these legislative uncertainties, IRP modeling at this time is premature. *Id.* The Company claims the impact of such legislation could fundamentally change the regional (and the Company's) resource mix, and therefore have an impact on the Company's customers. *Id.* Thus, to the extent any of the potential legislation is enacted, new models would need to be run to account for the actual impact of such legislation. *Id.* Further, in the Company's 2018 IRP, it did not have transportation resource needs in the 20-year planning horizon. *Id.* The Company represents it is currently assessing the alignment of portions of its electric and natural gas IRPs to reduce redundancy in analytics and economic assumptions. The newly requested filing date for the natural gas IRP is April 1, 2021. *Id.*

STAFF RECOMMENDATION

Staff recommends the Commission issue a Notice of Petition and Notice of Modified Procedure, with comments due twenty-one days from the issuance of the Notice and reply comments due seven days later.

COMMISSION DECISION

Does the Commission wish to issue a Notice of Petition and Notice of Modified Procedure that establishes a twenty-one day comment period and a seven day reply period?



John R. Hammond Jr.
Deputy Attorney General

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