



Avista Corp.

1411 East Mission P.O. Box 3727
Spokane, Washington 99220-0500
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July 2, 2021

Commission Secretary
State of Idaho
Idaho Public Utilities Commission
11331 W. Chinden Blvd. Building 8, Suite 201-A
Boise, Idaho 83714

Case No. AVU-G-21-04

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IDAHO PUBLIC
UTILITIES COMMISSION

I.P.U.C. No. 27 – Natural Gas Service

In accordance with Case No. GNR-U-20-01, Order No. 34602, which suspends the requirement to file physical copies, the Company has attached for electronic filing with the Commission are the following revised tariff sheets:

Twenty-Ninth Revision Sheet 150	canceling	Twenty-Eighth Revision Sheet 150
Twenty-Third Revision Sheet 155	canceling	Twenty- Second Revision Sheet 155

The Company requests that the proposed tariff sheets be made effective September 1, 2021. These tariff sheets reflect the Company's annual Purchased Gas Cost Adjustment ("PGA"). If approved, the Company's annual revenue will *increase* by approximately \$9.0 million or approximately 13.5%. The proposed changes have no effect on the Company's earnings. Detailed information related to the Company's request was filed electronically along with the attached Application and supporting workpapers.

Filed concurrently with this PGA is the Deferred Balances Credit filing. If both the PGA and Deferred Balances Credit filings are approved, residential natural gas customers in Idaho using an average of 63 therms per month would see their monthly bills increase from \$49.49 to \$54.05, an increase of \$4.56 per month, or approximately 9.2%. The proposed natural gas rate changes would be effective September 1, 2021.

Based on discussions with Commission Staff, the Company will provide directly to Commission Staff capacity release detail as soon as it becomes available.

If you have any questions regarding this filing, please contact Marcus Garbarino at (509) 495-2567.

Sincerely,

/s/ Patrick D. Ehrbar

Patrick D. Ehrbar
Director of Regulatory Affairs

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF THE APPLICATION OF)
AVISTA UTILITIES FOR AN ORDER APPROVING) CASE: AVU-G-21-04
A CHANGE IN RATES FOR PURCHASED GAS)
COSTS AND AMORTIZATION OF GAS-RELATED)
DEFERRAL BALANCES)

Application is hereby made to the Idaho Public Utilities Commission for an Order approving a revised schedule of rates and charges for natural gas service in the state of Idaho. The Applicant requests that the proposed rates included in this Purchased Gas Cost Adjustment (“PGA”) filing be made effective on September 1, 2021. If approved as filed, the Company’s annual revenue will increase by approximately \$9.0 million or about 13.5%. In support of this Application, Applicant states as follows:

I.

The name of the Applicant is AVISTA CORPORATION, doing business as AVISTA UTILITIES (hereinafter Avista, Applicant or Company), a Washington corporation, whose principal business office is 1411 East Mission Avenue, Spokane, Washington, and is qualified to do business in the state of Idaho. Applicant maintains district offices in Moscow, Lewiston, Coeur d'Alene, Sandpoint, and Kellogg, Idaho. Communications in reference to this Application should be addressed to:

Patrick D. Ehrbar
Director of Regulatory Affairs
Avista Utilities
1411 E. Mission Avenue
Spokane, WA 99220-3727
Phone: (509) 495-8620
Pat.ehrbar@avistacorp.com
Dockets@avistacorp.com

II.

Attorney for the Applicant and his address is as follows:

David J. Meyer
Vice President and Chief Counsel for Regulatory
And Governmental Affairs
Avista Utilities
1411 E. Mission Avenue
Spokane, WA 99220-3727
Phone: (509) 495-4316

III.

The Applicant is a public utility engaged in the distribution of natural gas in certain portions of Northern Idaho, Eastern and Central Washington, and Southwestern and Northeastern Oregon, and further engaged in the generation, transmission, and distribution of electricity in Northern Idaho and Eastern Washington.

IV.

Twenty-Ninth Revision Sheet 150, which Applicant requests the Commission approve, is filed herewith as Exhibit "A". Additionally, Twenty-Third Revision Sheet 155, which Applicant requests the Commission approve, is also filed herewith as Exhibit "A". Also included in Exhibit "A" is a copy of Twenty-Ninth Revision Sheet 150 and Twenty-Third Revision Tariff Sheet 155 with the changes underlined and a copy of Twenty-Eighth Revision Sheet 150 and Twenty-Second Revision Tariff Sheet 155 with the proposed changes shown by lining over the current language or rates.

V.

The existing rates and charges for natural gas service on file with the Commission and designated as Applicant's Tariff IPUC No. 27, which will be superseded by the rates and charges filed herewith, are incorporated herein as though fully attached hereto.

VI.

Notice to the Public of Applicant's proposed tariffs is to be given simultaneously with the filing of this Application by posting, at each of the Company's district offices in Idaho, a Notice in the form attached hereto as Exhibit "B" and by means of a press release distributed to various informational agencies, a draft copy attached hereto in Exhibit "C". In addition, Exhibit "C" to this Application also contains the form of customer notice that the Company will send to its customers in its monthly bills in the July timeframe.

VII.

The circumstances and conditions relied on for approval of Applicant's revised rates are as follows: Applicant purchases natural gas for customer usage and transports it over Williams Northwest Pipeline, Gas Transmission Northwest (GTN), TC Energy - Alberta, TC Energy - BC and Enbridge Energy Pipeline systems, and defers the effect of timing differences due to implementation of rate changes and differences between Applicant's actual weighted average cost of gas ("WACOG") purchased and the WACOG embedded in rates. Applicant also defers various pipeline refunds or charges and miscellaneous revenue received from natural gas related transactions including pipeline capacity releases. Workpapers for all proposed Commodity, Demand and Amortization costs are provided with this filing as Exhibit "D".

VIII.

This filing reflects the Company's proposed annual PGA to: 1) pass through changes in the estimated cost of natural gas for the September 2021 through October 2022 fourteen-month period (Schedule 150), and 2) revise the amortization rate(s) to refund or collect the balance of deferred natural gas costs (Schedule 155). Below is a table summarizing the proposed rate changes reflected in this filing:

<u>Service</u>	<u>Sch. No.</u>	<u>Commodity Change per therm</u>	<u>Demand Change per therm</u>	<u>Total Sch. 150 Change</u>	<u>Amortization Change per therm</u>	<u>Total PGA Rate Change per therm</u>
General	101	\$ 0.04022	\$ 0.00238	\$ 0.04260	\$ 0.05259	\$ 0.09519
Lg. General	111	\$ 0.04022	\$ 0.00238	\$ 0.04260	\$ 0.05259	\$ 0.09519
Lg General	112	\$ 0.04022	\$ 0.00238	\$ 0.04260	\$ -	\$ 0.04260
Interruptible	131	\$ 0.04022	\$ -	\$ 0.04022	\$ -	\$ 0.04022
Transportation	146	\$ -	\$ -	\$ -	\$ -	\$ -

The Company is filing this Application earlier than the typical August-September timeframe in order to limit the bill impact to customers from the accumulated deferral and amortization surcharge balances that have increased due to rising natural gas costs in recent months since our last filing.

The Company is filing another Application simultaneously with this application designed to refund deferred credit balances associated with depreciation expense, Accumulated Funds Used During Construction, and CARES Acts benefits that would decrease natural gas revenues by approximately \$1.9 million or 2.9% effective September 1, 2021. If both applications are approved the net change to natural gas revenue would be an increase of approximately \$7.1 million or 10.6% effective September 1, 2021.

IX.

Schedule 150 / Purchase Gas Cost - Commodity Costs

As shown in the table above, the estimated WACOG change is an increase of \$0.04022 per therm; the proposed WACOG of \$0.20305 per therm compared to the present WACOG of \$0.16283 per therm included in rates. The cost of natural gas commodity remains relatively low in comparison to historical periods, however, wholesale natural gas prices in recent months as well as the forward prices have risen substantially compared to the level presently included in rates. The market factors attributing to the rise in prices is an overall increase in demand and lower supply. The main driver in demand has been record exports to Mexico, elevated LNG exports and increased use for power generation. On the supply side, production has been slow to ramp up to pre-pandemic levels. In addition, storage levels are well below where they were at this time last year and the current forecasted end of season level is seen as significantly below last year's level.

The Company's natural gas Procurement Plan ("Plan") uses a diversified approach to procure natural gas for the coming PGA year. While the Plan generally incorporates a more structured approach for the hedging portion of the portfolio, the Company exercises flexibility and discretion in all areas of the plan based on changes in the wholesale market. The Company typically meets with Commission Staff semi-annually to discuss the state of the wholesale market and the status of the Company's Plan. In addition, the Company communicates with Staff when it believes it makes sense to deviate from its Plan and/or opportunities arise in the market.

Avista has been hedging natural gas on both a periodic and discretionary basis throughout the previous thirty-six months for the forthcoming PGA year. Approximately 27% of the annual load requirements for this year's PGA period (September 2021 through October 2022) have been hedged at a fixed-price derived from the Company's Plan. Through May, the hedge volumes for the PGA period have been executed at a weighted average price of \$1.81 per dekatherm (\$0.181 per therm).

The Company used a 60-day historical average of AECO forward prices (ending May 31, 2021) to develop an estimated cost associated with index purchases. These index purchases represent approximately 73% of estimated annual load requirements for the coming year. The annual weighted average price for these volumes is \$2.34 per dekatherm (\$0.234 per therm).

X.

Schedule 150 / Purchase Gas Cost - Demand Costs

Demand costs reflect the cost of pipeline transportation to the Company's system, as well as fixed costs associated with natural gas storage. As shown in the table above, demand costs are expected to *slightly increase* for residential customers by approximately \$0.00238 per therm. This increase is related to a variety of factors including Canadian exchange rate, updated demand forecast, and new rates for Canadian pipelines effective June 1, 2021.

XI.

Schedule 155 / Amortization Rate Change

As shown in the table above, the proposed amortization rate change for Schedule 101 and Schedule 111 is an increase in revenue (or expiration of the existing rebate and replacing with a surcharge) of \$0.05259 per therm. The current rate applicable to Schedule 101 and Schedule 111 is \$0.03754 per therm in the rebate direction; the proposed rate is \$0.01505 per therm in the surcharge direction.

In the 2020 PGA filing, the Company forecast a total amortization rebate to customers of approximately \$3.4 million effective November 1, 2020. The forecast did not materialize as projected, resulting in an actual amortization surcharge balance of \$0.7 million as of November 1, 2020. From November 1, 2020 through May 31, 2021, the surcharge balance has grown to \$3.5 million as customers have been receiving a rebate amortization rate.

In this PGA filing, the Company has used the deferral and amortization balances as of May 2021. The result is a surcharge amortization rate to collect approximately \$4.4 million from customers. To reduce the impact on customer bills, the Company has proposed an amortization period of 38 months, instead of the normal 12-month period. The Company will re-evaluate the amortization period during the next PGA filing and adjust if deemed appropriate. On a per therm basis, the net impact of the expiring amortization rebate and the new amortization surcharge is a change in the amortization rate of \$0.05259 per therm.

XII.

If approved as filed, the Company's annual revenue will *increase* by approximately \$9.0 million or about 13.5% effective September 1, 2021. Residential or small commercial customers using an average of 63

therms per month would see an increase of \$6.00 per month, or approximately 12.1%. The present bill for 63 therms is \$49.49 while the proposed bill is \$55.49.

XIII.

Exhibit "D" attached hereto contains support workpapers for the Proposed Tariff Rates proposed by Applicant contained in Exhibit "A".¹

XIV.

Avista requests that the rates proposed in this filing be approved to become effective on September 1, 2021, and requests that the matter be processed under the Commission's Modified Procedure rules through the use of written comments. Avista stands ready for immediate consideration on its Application.

XV.

WHEREFORE, Avista requests the Commission issue its Order finding its proposed rates to be just, reasonable, and nondiscriminatory and to become effective for all natural gas service on and after September 1, 2021. The overall increase is approximately \$9.0 million or 13.5%. The Company requests that the matter be processed under the Commission's Modified Procedure rules through the use of written comments.

Dated at Spokane, Washington, this 2nd day of July 2021.

AVISTA UTILITIES
BY

/s/ David J. Meyer

David J. Meyer
Vice President and Chief Counsel for
Regulatory & Governmental Affairs
Avista Corporation

¹ Based on discussions with Commission Staff, the Company will provide directly to Commission Staff capacity release detail as soon as it becomes available.

AVISTA UTILITIES

Case No. AVU-G-21-04

EXHIBIT “A”

Proposed Tariff Sheets

AVISTA CORPORATION
 d/b/a Avista Utilities

**SCHEDULE 150
 PURCHASE GAS COST ADJUSTMENT - IDAHO**

APPLICABLE:

To Customers in the State of Idaho where Company has natural gas service available.

PURPOSE:

To pass through changes in costs resulting from purchasing and transporting natural gas, to become effective as noted below.

RATE:

- (a) The retail rates of firm gas Schedules 101, 111 and 112 are to be increased by 29.548¢ per therm in all blocks of these rate schedules.
- (b) The rates of interruptible Schedules 131 and 132 are to be increased by 20.305¢ per therm.
- (c) The rate for transportation under Schedule 146 is to be decreased by 0.000¢ per therm.

WEIGHTED AVERAGE GAS COST:

The above rate changes are based on the following weighted average cost of gas per therm as of the effective date shown below:

	Demand	Commodity	Total
Schedules 101	9.243¢	20.305¢	29.548¢
Schedules 111 and 112	9.243¢	20.305¢	29.548¢
Schedules 131 and 132	0.000¢	20.305¢	20.305¢

The above amounts include a gross revenue factor.

	Demand	Commodity	Total
Schedules 101	9.203¢	20.217¢	29.420¢
Schedules 111 and 112	9.203¢	20.217¢	29.420¢
Schedules 131 and 132	0.000¢	20.217¢	20.217¢

The above amounts do not include a gross revenue factor.

BALANCING ACCOUNT:

The Company will maintain a Purchase Gas Adjustment (PGA) Balancing Account whereby monthly entries into this Balancing Account will be made to reflect differences between the actual purchased gas costs collected from customers and the actual purchased gas costs incurred by the Company. Those differences are then collected from or refunded to customers under Schedule 155 – Gas Rate Adjustment.

Issued July 2, 2021

Effective September 1, 2021

Issued by Avista Utilities
 By

Patrick Ehrbar – Director of Regulatory Affairs



AVISTA CORPORATION
 d/b/a Avista Utilities

**SCHEDULE 150
 PURCHASE GAS COST ADJUSTMENT - IDAHO**

APPLICABLE:

To Customers in the State of Idaho where Company has natural gas service available.

PURPOSE:

To pass through changes in costs resulting from purchasing and transporting natural gas, to become effective as noted below.

RATE:

- (a) The retail rates of firm gas Schedules 101, 111 and 112 are to be increased by ~~25.288¢~~ per therm in all blocks of these rate schedules.
- (b) The rates of interruptible Schedules 131 and 132 are to be increased by ~~16.283¢~~ per therm.
- (c) The rate for transportation under Schedule 146 is to be decreased by 0.000¢ per therm.

WEIGHTED AVERAGE GAS COST:

The above rate changes are based on the following weighted average cost of gas per therm as of the effective date shown below:

	Demand	Commodity	Total
Schedules 101	9.005¢	16.283¢	25.288¢
Schedules 111 and 112	9.005¢	16.283¢	25.288¢
Schedules 131 and 132	0.000¢	16.283¢	16.283¢

The above amounts include a gross revenue factor.

	Demand	Commodity	Total
Schedules 101	8.952¢	16.188¢	25.140¢
Schedules 111 and 112	8.952¢	16.188¢	25.140¢
Schedules 131 and 132	0.000¢	16.188¢	16.188¢

The above amounts do not include a gross revenue factor.

BALANCING ACCOUNT:

The Company will maintain a Purchase Gas Adjustment (PGA) Balancing Account whereby monthly entries into this Balancing Account will be made to reflect differences between the actual purchased gas costs collected from customers and the actual purchased gas costs incurred by the Company. Those differences are then collected from or refunded to customers under Schedule 155 – Gas Rate Adjustment.

Issued June 30, 2020

Effective November 1, 2020

Issued by Avista Utilities
 By

Patrick Ehrbar – Director of Regulatory Affairs

AVISTA CORPORATION
 d/b/a Avista Utilities

**SCHEDULE 150
 PURCHASE GAS COST ADJUSTMENT - IDAHO**

APPLICABLE:

To Customers in the State of Idaho where Company has natural gas service available.

PURPOSE:

To pass through changes in costs resulting from purchasing and transporting natural gas, to become effective as noted below.

RATE:

- (a) The retail rates of firm gas Schedules 101, 111 and 112 are to be increased by 29.548¢ per therm in all blocks of these rate schedules.
- (b) The rates of interruptible Schedules 131 and 132 are to be increased by 20.305¢ per therm.
- (c) The rate for transportation under Schedule 146 is to be decreased by 0.000¢ per therm.

WEIGHTED AVERAGE GAS COST:

The above rate changes are based on the following weighted average cost of gas per therm as of the effective date shown below:

	Demand	Commodity	Total
Schedules 101	<u>9.243¢</u>	<u>20.305¢</u>	<u>29.548¢</u>
Schedules 111 and 112	<u>9.243¢</u>	<u>20.305¢</u>	<u>29.548¢</u>
Schedules 131 and 132	0.000¢	<u>20.305¢</u>	<u>20.305¢</u>

The above amounts include a gross revenue factor.

	Demand	Commodity	Total
Schedules 101	<u>9.203¢</u>	<u>20.217¢</u>	<u>29.420¢</u>
Schedules 111 and 112	<u>9.203¢</u>	<u>20.217¢</u>	<u>29.420¢</u>
Schedules 131 and 132	0.000¢	<u>20.217¢</u>	<u>20.217¢</u>

The above amounts do not include a gross revenue factor.

BALANCING ACCOUNT:

The Company will maintain a Purchase Gas Adjustment (PGA) Balancing Account whereby monthly entries into this Balancing Account will be made to reflect differences between the actual purchased gas costs collected from customers and the actual purchased gas costs incurred by the Company. Those differences are then collected from or refunded to customers under Schedule 155 – Gas Rate Adjustment.

Issued July 2, 2021

Effective September 1, 2021

Issued by Avista Utilities
 By

Patrick Ehrbar – Director of Regulatory Affairs

AVISTA CORPORATION
d/b/a Avista Utilities

SCHEDULE 155
GAS RATE ADJUSTMENT - IDAHO

AVAILABLE:

To Customers in the State of Idaho where Company has natural gas service available.

PURPOSE:

To adjust gas rates for amounts generated by the sources listed below.

MONTHLY RATE:

- (a) The rates of firm gas Schedules 101 and 111 are to be increased by 1.505¢ per therm in all blocks of these rate schedules.
- (b) The rate of interruptible gas Schedule 131 is to be decreased by 0.000¢ per therm.
- (c) The rate of transportation gas Schedule 146 is to be decreased by 0.000¢ per therm.

SOURCES OF MONTHLY RATE:

Changes in the monthly rates above result from amounts which have been accumulated in the Purchase Gas Adjustment (PGA) Balancing Account as described in Schedule 150 – Purchase Gas Cost Adjustment.

SPECIAL TERMS AND CONDITIONS:

The above Monthly Rate is subject to the provisions of Tax Adjustment Schedule 158.

Issued July 2, 2021

Effective September 1, 2021

Issued by Avista Utilities
By

Patrick Ehrbar, Director of Regulatory Affairs



AVISTA CORPORATION
d/b/a Avista Utilities

SCHEDULE 155
GAS RATE ADJUSTMENT - IDAHO

AVAILABLE:

To Customers in the State of Idaho where Company has natural gas service available.

PURPOSE:

To adjust gas rates for amounts generated by the sources listed below.

MONTHLY RATE:

- (a) The rates of firm gas Schedules 101 and 111 are to be ~~decreased~~ by ~~3.754¢~~ per therm in all blocks of these rate schedules.
- (b) The rate of interruptible gas Schedule 131 is to be decreased by 0.000¢ per therm.
- (c) The rate of transportation gas Schedule 146 is to be decreased by 0.000¢ per therm.

SOURCES OF MONTHLY RATE:

Changes in the monthly rates above result from amounts which have been accumulated in the Purchase Gas Adjustment (PGA) Balancing Account as described in Schedule 150 – Purchase Gas Cost Adjustment.

SPECIAL TERMS AND CONDITIONS:

The above Monthly Rate is subject to the provisions of Tax Adjustment Schedule 158.

Issued June 30, 2020

Effective November 1, 2020

Issued by Avista Utilities
By

Patrick Ehrbar, Director of Regulatory Affairs

AVISTA CORPORATION
d/b/a Avista Utilities

SCHEDULE 155
GAS RATE ADJUSTMENT - IDAHO

AVAILABLE:

To Customers in the State of Idaho where Company has natural gas service available.

PURPOSE:

To adjust gas rates for amounts generated by the sources listed below.

MONTHLY RATE:

- (a) The rates of firm gas Schedules 101 and 111 are to be increased by 1.505¢ per therm in all blocks of these rate schedules.
- (b) The rate of interruptible gas Schedule 131 is to be decreased by 0.000¢ per therm.
- (c) The rate of transportation gas Schedule 146 is to be decreased by 0.000¢ per therm.

SOURCES OF MONTHLY RATE:

Changes in the monthly rates above result from amounts which have been accumulated in the Purchase Gas Adjustment (PGA) Balancing Account as described in Schedule 150 – Purchase Gas Cost Adjustment.

SPECIAL TERMS AND CONDITIONS:

The above Monthly Rate is subject to the provisions of Tax Adjustment Schedule 158.

Issued July 2, 2021

Effective September 1, 2021

Issued by Avista Utilities
By

Patrick Ehrbar, Director of Regulatory Affairs

AVISTA UTILITIES

Case No. AVU-G-21-04

EXHIBIT “B”

Notice of Public Applicant’s Proposed Tariffs

**Important Notice for Idaho Customers DRAFT
(July 2021)**

Avista has filed two rate adjustment requests with the Idaho Public Utilities Commission (Commission), that if approved, are designed to increase overall natural gas revenue by approximately \$7.1 million or 10.6% effective Sept. 1, 2021. These filings have no impact on Avista's earnings.

The **first** adjustment is related to the annual Purchased Gas Cost Adjustment (PGA) filing. The PGA is filed each year to balance the actual cost of wholesale natural gas purchased by Avista to serve customers with the amount included in rates. This includes the natural gas commodity cost as well as the cost to transport natural gas on interstate pipelines to Avista's local distribution system. The increase is primarily driven by two factors: 1) wholesale natural gas costs that are higher than the level presently included in rates, and 2) the expiration of a rebate customers are currently receiving from last year's PGA. If approved, Avista's request is designed to increase annual natural gas revenues by approximately \$9.0 million or 13.5%.

The **second** filing is the Deferred Balances Credit filing. This filing returns to customers deferred balances related to depreciation expense, Accumulated Funds Used During Construction (AFUDC), and CARES Act benefits. If approved, Avista's request is designed to decrease natural gas revenues by approximately \$1.9 million or 2.9%.

These rate adjustment filings are separate and distinct from the Settlement Stipulation filed on June 14, 2021 related to the pending general rate case filing, that, if approved, would reduce customer's natural gas bills by an overall 4.5%, also on Sept. 1, 2021.

Customer Bills

Natural Gas

If the natural gas PGA and the Deferred Balances Credit filings are approved, residential natural gas customers in Idaho using an average of 63 therms per month would see their monthly bills increase from \$49.49 to \$54.05, an increase of \$4.56 per month, or approximately 9.2%. The proposed natural gas rate changes would be effective Sept. 1, 2021.

The net effect, on an annual revenue basis, for the requested natural gas rate changes by rate schedule are:

General Service - Schedule 101	9.2%
Large General Service - Schedules 111 & 112	16.3%
Transportation Service - Schedule 146	<u>-2.9%</u>
Overall	10.6%

Rate Application Procedure

The Company's applications are proposals, subject to public review and a Commission decision. Copies of the applications are available for public review at the offices of both the Commission and Avista, and on the Commission's website (www.puc.idaho.gov). Customers may file with the Commission written comments related to the Company's filings. Customers may also subscribe to the Commission's RSS feed (<http://www.puc.idaho.gov/rssfeeds/rss.htm>) to receive periodic updates via e-mail about the case. Copies of rate filings are also available on our website, www.myavista.com/rates.

If you would like to submit comments on the proposed rate change, you can do so by going to the Commission website or mailing comments to:

Idaho Public Utilities Commission
P.O. Box 83720
Boise, ID 83720-0074

Avista offers a number of programs and services to help customers manage their energy use and costs. Visit www.myavista.com for information on these programs which include Comfort Level Billing, bill payment options, automated payment service, assistance programs, conservation tips, and energy efficiency rebates.

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DAVID J. MEYER
VICE PRESIDENT AND CHIEF COUNSEL FOR
REGULATORY & GOVERNMENTAL AFFAIRS
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DAVID.MEYER@AVISTACORP.COM

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF THE APPLICATION)	CASE NO. AVU-G-21- <u>04</u>
OF AVISTA CORPORATION FOR AN)	
ORDER APPROVING A CHANGE)	ATTORNEY'S CERTIFICATE
IN NATURAL GAS RATES AND CHARGES)	CLAIM OF
TO NATURAL GAS CUSTOMERS IN THE)	CONFIDENTIALITY
STATE OF IDAHO)	RELATING TO PORTIONS
)	OF AVISTA'S EXHIBIT'S
)	AND WORKPAPERS
)	

1 **FOR AVISTA CORPORATION**

2 I, David J. Meyer, represent Avista Corporation. I am Vice President and Chief
3 Counsel for Regulatory and Governmental Affairs for Avista Corporation (Avista or
4 Company) and I am appearing on its behalf in this proceeding.

5 I make this certification and claim of confidentiality pursuant to IDAPA 31.01.01
6 because Avista, through its supporting workpapers, is disclosing certain information that
7 is CONFIDENTIAL and constitutes TRADE SECRETS as defined by Idaho Code
8 Section 9-340 and 48-801 and protected under IDAPA 31.01.01.067 and 31.01.01.233.

9 The electronic information Avista provides will, as required under IDAPA Rule
10 31.01.01.067, be marked as CONFIDENTIAL on all documents. In accordance with
11 Case No. GNR-U-20-01, Order No. 34602 which suspends the requirement to physically
12 file documents due to the COVID-19 Pandemic, the Company will file all work papers,
13 tariffs, and exhibits only in electronic format.

14 The confidential information that Avista is disclosing includes, but is not limited
15 to certain forward wholesale natural gas pricing which is provided by a third-party
16 vendor, who does not allow public access to their proprietary information. Avista herein
17 asserts that the aforementioned information is confidential in that making third-party
18 pricing data public will violate the terms of our agreement with the vendor.

19 I am of the opinion that this information is CONFIDENTIAL, as defined by
20 Idaho Code Sections 9-340D and 48-801, should therefore be protected from public
21 inspection, examination and copying, and should be utilized only in accordance with the
22 terms of the protective agreement between Avista Corporation and Parties who have
23 requested such an agreement.

