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July 6, 2022

Jan Noriyuki, Secretary
Idaho Public Utilities Commission
11331 W. Chinden Blvd. Bldg. 8, Ste. 201-A
Boise, Idaho 83714

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IDAHO PUBLIC
UTILITIES COMMISSION

RE: Case No. AVU-G-22-01 - Avista Utilities Proposed Tariff Schedule 195 “Optional Renewable Natural Gas”

Dear Ms. Noriyuki:

Avista Corporation dba Avista Utilities (Avista or the Company) provides the following reply comments in Case No. AVU-G-22-01, regarding Avista’s proposed tariff Schedule 195 to offer Idaho natural gas customers with an optional renewable natural gas (RNG) program. The comments contained herein are in response to the comments filed by Commission Staff on June 23, 2022.

Avista would like to thank Staff for their thorough analysis and recommended approval of the Company’s proposed Optional Renewable Natural Gas tariff schedule. The Company supports the tariff changes and annual reporting recommendation proposed by Staff and will submit updated tariff sheets upon approval of its Option RNG program. Avista proposes that the annual reports be provided by April 30th of each year.

In response to Staff’s concerns pertaining to the adoption of the M-RETS system and use of Renewable Thermal Certificates (RTCs), the Company would like to clarify that it does have processes in place to verify the RNG and corresponding RTCs are transferred from PSE to Avista when an RNG purchase is made. Gas Schedulers will purchase appropriate amounts of RNG to support the customers enrolled in its Optional RNG Program. Once the purchase is made the RTCs (for each dth of gas purchased) will be transferred to Avista’s MRETs account upon delivery of the RNG. The Gas Scheduler will then verify the RTCs have been transferred from PSE to Avista, ensuring that no other party is utilizing the same RTCs or being used under any other greenhouse gas reduction program.

In its comments, Staff notes that the Company has 69 customer enrollments in its Optional RNG program to date. As of June 21, 2022, Avista has a total of 517 customers enrolled in its Optional

RNG program with 378 enrollments in Washington and 139 in Oregon. Avista is confident that the growing interest in the program in both Washington and Oregon will also be reflective of its customers in Idaho.

Please direct any questions regarding these comments to Amanda Ghering at amanda.ghering@avistacorp.com or 509-495-7950.

Sincerely,

/s/ Shawn Bonfield

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