BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF AVISTA) CASE NO. AVU-G-25-03
CORPORATION'S 2025 NATURAL GAS	
INTEGRATED RESOURCE PLAN (IRP)) NOTICE OF FILING
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) NOTICE OF INTERVENTION
) DEADLINE
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) ORDER NO. 36567
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)) ORDER NO. 36567)

On March 31, 2025, Avista Corporation, d/b/a/ Avista Utilities ("Company") filed its 2025 Natural Gas Integrated Resource Plan ("2025 IRP") with the Idaho Public Utilities Commission ("Commission"). The 2025 IRP outlines and analyzes the Company's strategy for meeting its natural gas customers' projected energy needs. The Company files a natural gas IRP every two years and uses it to guide resource acquisitions. With this Order, the Commission provides notice that the Company has filed its 2025 IRP and sets deadlines for interested persons to petition to intervene.

NOTICE OF FILING

YOU ARE HEREBY NOTIFIED that the Company's 2025 IRP is approximately 262 pages, with approximately 868 pages of appendices. The 2025 IRP sets forth 11 sections: (1) Introduction and Planning Environment; (2) Preferred Resource Strategy; (3) Demand Forecast; (4) Demand Side Resources; (5) Gas Markets and Current Resources; (6) Supply-Side Resource Options; (7) Policy Considerations; (8) Alternate Scenarios; (9) Customer Equity and Metrics; (10) Distribution Planning; and (11) Action Plan. 2025 IRP at 10-11.

YOU ARE FURTHER NOTIFIED that the Company represents that it is an investor-owned utility involved in the production, transmission, and distribution of natural gas and electricity, as well as other energy-related businesses. *Id.* at 21. The Company states that it provides natural gas service to approximately 377,000 customers in eastern Washington, northern Idaho, and northeast and southwest Oregon. *Id.*

YOU ARE FURTHER NOTIFIED that the Company represents that the 2025 IRP provides a comprehensive long-range planning tool, fully integrates forecasted requirements with existing and potential resources, determines the most cost-effective and risk adjusted means for meeting

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future demand requirement, and meets Washington, Idaho, and Oregon regulations, commission orders, environmental programs, and other applicable guidelines. *Id.* at 26. The Company represents that the 2025 IRP process considers customer growth and expected usage, weather planning standards, weather futures, energy efficiency opportunities, existing and potential supply-side resource options, current and known legislation/regulation, greenhouse gas emissions reductions and compliance mechanisms, risk, and least-cost mix of supply and conservation. *Id.* at 26-27.

YOU ARE FURTHER NOTIFIED that the Company states the 2025 IRP identifies a Preferred Resource Strategy ("PRS") to meet system energy demands in Oregon, Washington, and Idaho. *Id.* at 4-7. The Company provides a PRS for Idaho which utilizes natural gas from existing access to supply basins and existing storage. *Id.* at 7. The Company states that the Idaho PRS combines available resources, demand expectations, and current resource needs to select a least cost and least risk portfolio to serve customers in a safe and reliable strategy. *Id.*

YOU ARE FURTHER NOTIFIED that the Company presents some highlighted information with respect to its demand forecast. *Id.* at 61-88. The Company represents that the Idaho natural gas annual average load growth is expected to increase by 0.37% due to an expected increase in customers, primarily in the residential and commercial classes. *Id.* at 70. The Company represents that end-use modeling techniques were used to develop the long-term load forecast. *Id.* at 61. The Company further represents that the Company expects a decrease in demand per customer due to warming temperature expectations, electric heat pump additions, and energy efficiency. *Id.*

YOU ARE FURTHER NOTIFIED that the Company presents some highlighted information with respect to its demand-side resources. *Id.* at 89-114. The Company states it is committed to continuing to offer natural gas energy efficiency programs to residential, low income, commercial, and industrial customer segments when feasible and cost effective within each jurisdiction. *Id.* at 89. The Company provides the following table outlining 2026-2027 conservation targets in Idaho by sector. *Id.* at 97.

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Table 4.2: Idaho 2026-2027 Conservation Target by Sector, (Dth)

Class	2026	2027	Total
Residential	13,858	33,833	47,691
Commercial	11,998	25,531	37,528
Industrial	401	818	1,219
Total	26,257	60,182	86,439

The Company states that in certain regions, energy efficiency is expected to offset 11% of demand by 2045. *Id.* The Company states that heat pumps can provide great efficiency, but conversion costs remain a primary barrier. *Id.*

YOU ARE FURTHER NOTIFIED that the Company presents some highlighted information with respect to gas markets and current resources. *Id.* at 115-138. The Company states that the 20 year levelized price of gas is forecasted to be \$4.94 per dekatherm at Henry Hub and \$3.66 per dekatherm at AECO. *Id.* at 115. The Company states that it procures 83% of its natural gas from Canada. *Id.* The Company states that Company owned and subscribed assets are optimized to help reduce costs to customers. *Id.* The Company states that the 2025 IRP provides the Company's Risk Management Policy, which describes the risk management policies and procedures focusing on: (1) the financial risk of the cost of natural gas system fuel options to supply customers will be unreasonably high or volatile, (2) emissions compliance cost options in Oregon and Washington, and (3) the physical risk that there may not be enough natural gas system resources to serve customers. *Id.* at 130.

YOU ARE FURTHER NOTIFIED that the Company presents some highlighted information with respect to its supply-side resource options. *Id.* at 139-170. The Company provides models for both gas supply options and storage resources. *Id.* at 139-144. The Company provides fuel supply and delivery options to meet future net energy demands. *Id.* at 144-145. The Company provides an evaluation of a variety of supply-side resources to build a gas supply portfolio, including the alternative fuel supply price risks. *Id.* at 146-163. The Company also provides a summary of the alternative fuel options to natural gas and storage. *Id.*

YOU ARE FURTHER NOTIFIED that the Company presents some highlighted information with respect to policy considerations. *Id.* at 171-184. The Company states that regulatory environments regarding energy topics such as renewable energy, carbon reduction, carbon intensity, and greenhouse gas regulation continue to evolve since publication of its 2023

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IRP. *Id.* at 171. The Company states that potential tariffs for natural gas purchased from Canada were not considered in the 2025 IRP. *Id.*

YOU ARE FURTHER NOTIFIED that the Company presents some highlighted information with respect to its alternative scenarios. *Id.* at 185-222. The Company states that future demand is the most uncertain assumption in the 2025 IRP. *Id.* The Company states that portfolio risk is dependent on quality, availability, and price of alternative resources. *Id.* The Company represents that recent peak weather events and diversification of resources are increasingly important to consider in a future resource mix. *Id.* The Company states that the system benefits from local storage and fuels to improve resilience if interstate pipelines become unavailable. *Id.*

YOU ARE FURTHER NOTIFIED that the Company presents some highlighted information with respect to its distribution planning. *Id.* at 245-256. The Company states that distribution planning is a continual process used to incorporate detailed operating conditions to maintain safe and reliable resources. *Id.* at 245.

YOU ARE FURTHER NOTIFIED that the Company presents ten action items in the 2025 IRP. Id. at 261. These include: (1) Purchase Community Climate Investments for compliance to the Climate Protection Plan for years 2025, 2026, 2027, 2028 and 2029 to comply with emission reduction targets; (2) Work with the Energy Trust of Oregon to meet IRP gross savings target of 463,410 therms in 2026; (3) Engage Oregon's stakeholders to explore additional new offerings for interruptible, transport, and low-income customers to work towards identified savings of 147,250 therms in 2026; (4) Acquire all estimated potential energy efficiency savings for Idaho and Washington; (5) In Washington, purchase allowances or offsets for compliance to the Climate Commitment Act for years 2025, 2026, 2027 and 2028 to comply with emissions reduction targets; (6) Release an annual Request for Proposal to investigate options of acquiring the necessary amount of renewable natural gas chosen in the PRS in 2030 of 1.184 million dekatherms; (7) Investigate adding liquified natural gas storage to improve resiliency in the North Idaho/Eastern Spokane region; (8) Investigate carbon capture technologies for further understanding of processes and costs needed for capturing and removal of carbon in large industry and direct air capture; (9) Perform at least two non-pipeline alternatives (NPA) analysis for Washington in 2025 and 2026; and (10) Perform an NPA analysis for any distribution project with an estimated cost greater than \$ 1 million in Oregon. *Id.*

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YOU ARE FURTHER NOTIFIED that the 2025 IRP and appendices are filed with the Commission and are available for public inspection during regular business hours at the Commission's office. These documents are also available on the Commission's website at www.puc.idaho.gov. Click on the "Natural Gas" icon, select "Open Cases," and then click on the case number as shown on the front of this document.

YOU ARE FURTHER NOTIFIED that all proceedings in this case will be held pursuant to the Commission's jurisdiction under Title 61 of the Idaho Code, and all proceedings in this matter will be conducted pursuant to the Commission's Rules of Procedure, IDAPA 31.01.01.000 *et seq*.

NOTICE OF INTERVENTION DEADLINE

YOU ARE FURTHER NOTIFIED that persons desiring to intervene in this matter to obtain parties' rights of participation must file a Petition to Intervene with the Commission pursuant to this Commission's Rules of Procedure 72 and 73, IDAPA 31.01.01.072 and -.073. Persons who wish to intervene as a party must file a Petition to Intervene no later than 21 days after the date of service of this Order. Such persons shall also provide the Commission Secretary with their email address to facilitate further communications. After the intervention deadline runs, the Commission Secretary shall issue a Notice of Parties that identifies the parties and assigns exhibit numbers to each party. Once the Notice of Parties has issued, Commission Staff shall informally confer with the Company and any intervening parties about how to further process this case and shall then report back to the Commission on a proposed case schedule.

YOU ARE FURTHER NOTIFIED that persons who would like to present their views without parties' rights of participation and cross-examination do not have to intervene but may present their views by submitting written comments to the Commission.

YOU ARE FURTHER NOTIFIED that the following people are designated as the Company's representatives in this matter:

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ORDER

IT IS HEREBY ORDERED that persons desiring to intervene in this matter must file a Petition to Intervene no later than 21 days from the service date of this Order. Once the deadline has passed, the Commission Secretary shall prepare and issue a Notice of Parties.

IT IS FURTHER ORDERED that, after the Notice of Parties has issued, Commission Staff shall confer with the parties regarding a procedural schedule for this matter including, if necessary, a hearing in this matter.

IT IS FURTHER ORDERED that parties comply with Order No. 35375, issued April 21, 2022. Generally, all pleadings should be filed with the Commission electronically and will be deemed timely filed when received by the Commission Secretary. *See* Rule 14.02. Service between parties should continue to be accomplished electronically when possible. However, voluminous discovery-related documents may be filed and served on CD-ROM or a USB flash drive.

DONE by Order of the Idaho Public Utilities Commission at Boise, Idaho this 23rd day of April 2025.

EDWARD LODGE RESIDENT

JOHN R. HAMMOND JR., COMMISSIONER

DAYN HARDIE, COMMISSIONER

ATTEST:

Monica Barrios-Sanchez Commission Secretary

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