



CHAD M. STOKES  
ADMITTED IN OREGON AND WASHINGTON

[cstokes@cablehuston.com](mailto:cstokes@cablehuston.com)

February 16, 2024

**VIA ELECTRONIC FILING**

Public Utility Commission of Oregon  
Attn: Filing Center  
201 High Street SE #100  
Salem, OR 97301

**Re: (Docket No. ADV 1588/Advice No. 24-01-G)  
Revision to Schedule 469 and UM 2254 deferral adjustment request.**

Dear Filing Center:

Alliance of Western Energy Consumers (“AWEC”) appreciates the opportunity to provide comments in response to Avista Corporation *dba* Avista Utilities’ (“Avista”) Docket No. Adv 1588 to modify Schedule 469 and associated UM 2254 deferral adjustment request.

Avista proposes to modify Schedule 469 to incorporate Schedule 440 Customers, (Interruptible Natural Gas Service for Large Commercial and Industrial) into the collection and distribution of the public purpose charge for energy efficiency programs. AWEC does not necessarily oppose Avista’s filing, and finds that the general framework is appropriate considering that the Climate Protection Plan (CPP) has been invalidated by the Oregon Court of Appeals. Regardless of the status of the CPP, AWEC supports energy efficiency programs for customers as they advance Oregon’s greenhouse gas and climate policies. However, AWEC does have a few questions and concerns about the filing that warrant further discussion.

1. Is there a cost cap on the energy efficiency programs for Schedule 440 customers? AWEC would support a reasonable cost cap for Schedule 440 customers.
2. How will the energy efficiency costs for Schedule 440 customers be allocated to customers? AWEC believes cost causation should be followed and Schedule 440 energy efficiency cost should be paid by the Schedule 440 class.

**Cable Huston LLP**

February 16, 2024

Page 2

3. How will the energy efficiency costs for Schedule 440 customers be spread? Will there be a fixed charge or will the cost be allocated on an equal percent or margin or equal cents per therm. AWEC understands that Avista's energy efficiency costs are spread on an equal cents per therm basis under UM 1979, which is no longer appropriate because the CPP rules are no longer in effect. At a minimum, further discussions on rate spread are appropriate for Avista's energy efficiency programs. The rate spread for energy efficiency programs is important so that the costs are fairly and equitably spread to customers.

Finally, AWEC does not object to Avista's proposed special condition preventing a Schedule 440 customer that received energy efficiency incentives from migrating to a transportation rate schedule to potentially avoid paying a public purpose charge.

AWEC appreciates the opportunity to provide these comments.

Very truly yours,



Chad M. Stokes

DMK:lr