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March 8, 2023

Public Utility Commission, Oregon
201 High St. SE, Suite 100
Salem, OR 97301

RE: LC 79 - Avista Utilities Natural Gas Fact Finding Comments on the Draft Report

Filing Center:

Avista Corporation, d/b/a/ Avista Utilities (Avista or the Company), hereby submits the following comments as requested by Oregon Public Utility Commission (OPUC or Commission) in Docket LC 79, Northwest Natural Gas Company's (NW Natural) 2022 Integrated Resource Plan (IRP) filing, as described in the Memorandum issued on February 13, 2023. Specifically, the Commission posed a number of questions related to modeling electrification within natural gas IRPs. While the Company will not respond to each of the individual questions posted, which it recognizes as important, rather it will provide general comments on the topic at hand. Also, Avista supports much of the comments provided by NW Natural in response to the questions posed.

First, Avista believes the topic of modeling electrification within IRPs to be broad, complex, and impacts all natural gas and electric utilities in Oregon. As such, the questions posed regarding electrification are better suited for a generic docket pertaining to IRP guidelines and the contents of an IRP, rather than an individual natural gas utility's docket for their IRP. Having these questions posed in a generic docket seems most fair as all interested parties will be notified and have an opportunity to participate in discussions and responding to written requests for comment. The outcome within a generic docket could be an update to the IRP guidelines that affect all investor-owned utilities regulated by the OPUC. Further, while Avista would have liked to address all of the questions posed, it lacked the time and resources to do so by March 8th due to finalizing its 2023 IRP that will be filed by March 31st. If these questions are posed in a generic docket with additional time allotted for discussion and written response, Avista will have the time and resources available to adequately participate and respond.

Second, the OPUC should carefully consider the work of any consultant it selects to assist in determining proxy values of electrification inputs to be used in IRPs. Any consultant selected should be neutral to a particular fuel type, well versed in resource planning in Oregon, and have the credentials to perform the analysis necessary to achieve the desired result. Certain consultants

may be biased based on prior work they have completed in Oregon or elsewhere, as such, Avista asks the Commission to allow for a public stakeholder process regarding the analysis performed by any consultant aiding Commission Staff with this effort. Stakeholders should be afforded the opportunity to review the scope of work, ask questions of the consultant's analytical methods, and provide input on the final results of any analysis performed. Also, if stakeholders see issues with the work performed by any such consultant, they should be given the opportunity to present those concerns before the Commission.

Finally, joint resource planning between natural gas and electric utilities would be quite difficult. Even the sharing of information used in IRPs between natural gas and electric utilities would be difficult due to the amount of work and effort already required to complete an IRP, along with when each utility files their IRP, which is greatly multiplied for Avista as it must meet the IRP requirements in Oregon, Washington and Idaho.

If you have any questions regarding this filing, please contact me at 509-495-2782 or shawn.bonfield@avistacorp.com.

Sincerely,

/s/ Shawn Bonfield

Shawn Bonfield
Sr. Manager of Regulatory Strategy & Policy

