



**Avista Corp.**

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February 15, 2024

Public Utility Commission Oregon  
Attention: Filing Center  
201 High Street SE, Suite 100  
Salem, OR 97301-1088

**Re: Docket No. LC 81 – Avista Utilities 2023 Natural Gas Integrated Resource Plan – Supplemental Chapter 9 - Action Plan**

Avista Corporation, dba Avista Utilities (Avista or the Company), provides the enclosed 2023 Natural Gas Integrated Resource Plan (IRP) revised 2023-2024 Action Plan. Revisions to the action plan include 1) removal of original Action Item No. 1 pertaining to the purchase of Community Climate Investments (CCIs) for compliance with the Climate Protection Plan (CPP); 2) modified original Action Item No. 4 to remove reference exploring additional new energy efficiency offerings for transport customers in 2024; and 3) removed original Action Item No. 5 related to the acquisition of Renewable Natural Gas (RNG) in 2023 and 2024 for Oregon. These revisions are necessary as the action items in question relate to compliance with the Climate Protection Program (CPP), which was ruled invalid by the Oregon Court of Appeals on December 20, 2023. Because the future of the CPP is unknown at this time, these action items are no longer necessary for 2023-2024. The Company discussed the changes with Commission Staff prior to this filing and Staff indicated they were supportive of these changes.

Please contact me with any questions regarding these changes 509-495-2782 or [shawn.bonfield@avistacorp.com](mailto:shawn.bonfield@avistacorp.com) or Tom Pardee at 509-495-2159 or [tom.pardee@avistacorp.com](mailto:tom.pardee@avistacorp.com).

Sincerely,

*/s/ Shawn Bonfield*

Shawn Bonfield  
Sr. Manager Regulatory Policy & Strategy



## 2023-2024 Action Plan

1. ETO identified 546,000 therms in the 2023 IRP verses 427,000 therms of planned savings in the 2023 ETO Budget and Action Plan. Avista will work with ETO to meet IRP gross savings target of 568,000 therms in 2024.
2. New program offered by ETO for interruptible customers in 2023 to save 15,000 therms.
3. Engage Oregon stakeholders to explore additional new offerings for interruptible and low-income customers to work towards identified savings of 375,000 therms in 2024.
4. In Washington purchase allowances or offsets for compliance to the Climate Commitment Act for years 2023, 2024, 2025 and 2026 to comply with emissions reduction targets.
5. Begin to offer a Washington transport customer EE program by 2024 with the goal of saving 35,000 therms
6. Explore methods for using Non-Energy Impact (NEI) values in future IRP analysis to account for social costs in Washington to ensure equitable outcomes.
7. Explore using end use modeling techniques for forecasting customer demand.
8. Consider contracting with an outside entity to help value supply side resource options such as synthetic methane, renewable natural gas, carbon capture, and green hydrogen.
9. Regarding high pressure distribution or city gate station capital work, Avista does not expect any supply side or distribution resource additions to be needed in our Oregon territory for the next four years, based on current projections. However, should conditions warrant that capital work is needed on a high-pressure distribution line or city gate station in order to deliver safe and reliable services to our customers, the Company is not precluded from doing such work. Examples of these necessary capital investments include the following:
  - Natural gas infrastructure investment not included as discrete projects in IRP
    - Consistent with the preceding update, these could include system investment to respond to mandates, safety needs, and/or maintenance of system associated with reliability
      - Including, but not limited to Aldyl A replacement, capacity reinforcements, cathodic protection, isolated steel replacement, etc.
    - Anticipated PHMSA guidance or rules related to 49 CFR Part §192 that will likely require additional capital to comply

- Officials from both PHMSA and the AGA have indicated it is not prudent for operators to wait for the federal rules to become final before improving their systems to address these expected rules.
  - Other special contract projects not known at the time the IRP was published
- Other non-IRP investments common to all jurisdictions that are ongoing, for example:
  - Enterprise technology projects & programs
  - Corporate facilities capital maintenance and improvements