

Avista Corp.

1411 East Mission P.O. Box 3727 Spokane. Washington 99220-0500 Telephone 509-489-0500 Toll Free 800-727-9170

October 30, 2020

Public Utilities Commission of Oregon Attn: Filing Center 201 High Street SE, Suite 100 Salem, OR 97301-3612

RE: Docket No. UM 1978—Avista Utilities Application for Reauthorization

Filing Center:

In accordance with ORS 757.259 and OAR 860-027-0300, Avista Corporation, dba Avista Utilities ("Avista" or "Company"), hereby submits for electronic filing an Application for Reauthorization to defer certain expenses or revenues related to its Low-Income Rate Assistance Program (LIRAP).

As required by OAR 800-027-0300(3)(e)(6), a Notice of Application and list of persons served with the Notice has been sent to all parties in the Company's current general rate case, Docket No. UG 389. A copy of the Notice and the Certificate of Service are attached as an Exhibit to the Application.

If you have any questions regarding this filing, please contact Jaime Majure at (509) 495-7839 or email <u>jaime.majure@avistacorp.com</u>.

Sincerely,

/s/Joe Miller

Joe Miller Sr. Manager of Rates & Tariffs Avista Utilities 509-495-4546 joe.miller@avistacorp.com

1	BEFORE THE PUBLIC UTILITY COMMISSION			
2	OF OREGON			
3	DOCKET NO. UM 1978			
4 5 6 7 8 9 10	IN THE MATTER OF THE APPLICATION OF AVISTA UTILITIES FOR AN ORDER AUTHORIZING DEFERRAL OF LOW-INCOME RATE ASSISTANCE PROGRAM EXPENSES COLLECTED THROUGH RATE SCHEDULE 493) APPLICATION) FOR REAUTHORIZATION) OF CERTAIN DEFERRAL) ACCOUNTS 		
11	Pursuant to ORS 757.259 and OAR 860-027-0300(4), Avista Corporation, dba Avista			
12	Utilities ("Avista" or "Company"), hereby applies to the Public Utility Commission of Oregon			
13	("Commission") for an order reauthorizing the Company to utilize deferred accounting for its Low-			
14	Income Rate Assistance Program (LIRAP). Avista respectfully requests that this deferral be			
15	effective for the 12-month period beginning January 1, 2021.			
16	In support of this Application, the Company states:			
17	Avista provides natural gas service in southwestern and northeastern Oregon and is a public			
18	utility subject to the Commission's jurisdiction under ORS 757.005(1)(a)(A).			
19	Avista requests that all notices, pleadings and correspondence regarding this Application be			
20	sent to the following:			
21 22 23 24 25 26 27 28 29 30	Director of Regulatory AffairsViceAvista Corporationfor RegulatoryP.O. Box 3727Avist1411 E. Mission, MSC-27P.O. ISpokane, WA 99220-37271411(509) 495-8620SpokaPat.ehrbar@avistacorp.com(509)David	I J. Meyer President and Chief Counsel egulatory and Governmental Affairs a Corporation Box 3727 E. Mission, MSC-27 ane, WA 99220-3727 495-4316 I.meyer@avistacorp.com		

1 This Application is filed pursuant to ORS 757.259, which empowers the Commission to 2 authorize the deferral of expenses or revenues of a public utility for later incorporation into rates.

3 BACKGROUND

4 Deferral of the revenues related to the Company's natural gas Low-Income Rate Assistance 5 Program was previously authorized by the Commission on December 16, 2019, through Order No. 6 19-424 of Docket No. UM 1978. The authorization for deferred accounting treatment as described 7 above can be authorized pursuant to ORS 757.259(2)(e). Under the Company's Tariff Schedule 493, 8 "Residential Low-Income Rate Assistance Program (LIRAP)-Oregon", Avista collects funds 9 necessary to administer and deliver low-income programs to its customers. The purpose of LIRAP 10 is to reduce the energy cost burden among those customers least able to pay energy bills, and the 11 revenue collected is provided to the four Community Action Agencies in Avista's Oregon service 12 territory for disbursal to qualifying customers and for administration of the program.

Over a 12-month period, the Company records the funds collected through Schedule 493, netted with the costs of LIRAP, in a balancing account; any unspent funds or uncollected costs are held over to the following year, with any adjustments needed requested in January of each year. This meets the requirement under ORS 757.259(2)(e), specifically "identifiable utility expenses or revenues, the recovery or refund of which the commission finds should be deferred in order to minimize the frequency of rate changes or the fluctuation of rate levels or to match appropriately the costs borne by and benefits received by ratepayers."

20 DESCRIPTION OF DEFERRAL

Presently, Avista records the funds collected with Schedule 493 and the costs of managing
 LIRAP in FERC Account No. 242.7 (Low Income Energy Assistance). A summary of the
 accounting entries recorded by Avista is as follows:

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Transactions to Record LIRAP Revenues and Costs					
FERC	Account Description DR	CR			
142.1	Customer Accounts Receivable \$XXX				
48X.X	Revenue from Customers	\$XXX			
To record revenue collected from Schedule 493.					
908.6	Customer Service & Information Expense \$XXX				
242.7	Low Income Energy Assistance	\$XXX			
To transfer funds collected from Schedule 493 to balancing					
	account.				
242.7	Low Income Energy Assistance \$XXX				
232.1	Accounts Payable	\$XXX			
	To record LIRAP costs.				

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As funds are distributed for LIRAP activities, the balancing account is debited for the amount of the expenditure disbursement. The balance in the account (either unspent funds or uncollected costs) is deferred at December 31 each year, with the net amount in the account included in the Company's filing when the LIRAP Surcharge is updated. In absence of a deferred accounting order from the Commission, Avista would instead transfer the balance of the account at December 31 into earnings. Interest accrues on this balancing account each month based on the average monthly fund balance at the Company's currently authorized rate of return.

9 PROPOSED ACCOUNTING

In this Reauthorization application, Avista is not proposing any change to the current deferral
 accounting. The Company would continue to record the funds collected through Schedule 493 as
 described above.

13 CURRENT DEFERRAL BALANCES

At December 31, 2019, the total unspent balance in the Low Income Energy Assistance account, subject to deferral, was \$67,297. For illustrative purposes, since December 31, 2017, a summary of LIRAP funds collected and spent is as follows:

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Avista's LIRAP Summary				
Transactions Recorded in Balancing Account (FERC Account No. 242.7)				
For December 31, 2017 through December 31, 2019				
Balance at December 31, 2017	\$	(62,286)		
2018 Tariff Collections		(212,616)		
2018 LIRAP Costs		185,400		
2018 Interest		(5,999)		
Balance at December 31, 2018	\$	(95,501)		
2019 Tariff Collections		(232,728)		
2019 LIRAP Costs		268,172		
2019 Interest		(7,240)		
Balance at December 31, 2019	\$	(67,297)		

At December 31, 2017, the Company's program-to-date collections exceeded its costs by \$62,286, with these funds subsequently spent in 2018. At December 31, 2018, the funds collected exceeded costs by an additional \$33,215, and the balance of \$95,501 was used in 2019. Similarly, at December 31, 2019, the carryover balance for the 2020 program year was \$67,297.

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6 WHEREFORE, Avista Utilities respectfully requests that the Commission reauthorize the 7 Company to defer the unspent funds or uncollected costs of its low-income programs for the 12-8 month period, January 1, 2021 through December 31, 2021. The Company is not proposing an 9 adjustment to customers' retail rates through this Application. Pursuant to OAR 800-027-10 0300(3)(e)(6), a copy of the Notice of Application and list of persons served with the Notice is 11 attached to this Application as Exhibit A. DATED this <u>30th</u> day of October 2020. 12 Respectfully submitted, 13 14 **Avista Utilities** By: /s/ David Meyer 15

16David J. Meyer, Vice President and Chief17Counsel for Regulatory and Governmental Affairs

Docket No. UM 1978

NOTICE OF APPLICATION FOR REAUTHORIZATION OF CERTAIN DEFERRAL ACCOUNTS

October 30, 2020

AVISTA

To All Parties Who Participated in UG 389:

Please be advised that on October 30, 2020, Avista Corporation, dba Avista Utilities ("Avista" or "Company"), applied to the Public Utility Commission of Oregon ("Commission") for an order reauthorizing the Company to utilize deferred accounting for its Low-Income Rate Assistance Program ("LIRAP"). This filing has been made pursuant to ORS 757.259 and OAR 860-027-0300(4).

This Notice is being sent to all parties that participated in Avista's most recent general rate case, Docket No. UG 389, to inform them that an Application for Reauthorization has been filed. Parties wanting more information or who wish to obtain a copy of the filing can access the Application on the Commission website, or by contacting either of the following:

Avista Utilities Attn: Patrick Ehrbar P.O. Box 3727 1411 E. Mission, MSC-27 Spokane, WA 99220-3727 (509) 495-8620 Public Utility Commission of Oregon Attn: Filing Center 201 High Street SE, Suite 100 PO Box 1088 Salem, OR 97301-1088 (509) 373-0886

Any person may submit to the Commission written comments on this matter by November 25, 2020. Approval of Avista's Application will not authorize a change in the Company's rates, but will permit the Commission to consider allowing such deferred amounts in rates in a subsequent proceeding.

DATED this 30th day of October 2020.

By: ____/s/David Meyer_____

David J. Meyer, Vice President and Chief Counsel for Regulatory and Governmental Affairs

UM 1978 – EXHIBIT A



I HEREBY CERTIFY that I have on this day, October 30, 2020, served by electronic mail the foregoing Notice of Application for Reauthorization of Certain Deferral Accounts, related to the deferral of funds collected for Avista's Low-Income Rate Assistance Program (LIRAP), to all parties of record for Avista's most recent general rate case, Docket No. UG 389, as indicated below:

Alliance of Western Energy Consumers (AWEC) Edward Finklea, Director of Natural Gas efinklea@awec.solutions

Chad M. Stokes Cable Huston, LLP <u>cstokes@cablehuston.com</u>

AVISTA

Tommy A. Brooks Cable Huston, LLP tbrooks@cablehuston.com Oregon Citizens Utility Board (CUB) dockets@oregoncub.org

Mike Goetz, Staff Attorney <u>mike@oregoncub.org</u>

William Gehrke will@oregoncub.org

Oregon Public Utilities Commission (OPUC)

Marianne Gardner, OPUC Staff Marianne.gardner@state.or.us Department of Justice Johanna Riemenschneider johanna.riemenschneider@doj.state.or.us

I declare under penalty of perjury that the foregoing is true and correct.

Dated at Spokane, Washington this 30th day of October 2020.

/ s/ JaimeMajure

Jaime Majure Regulatory Policy Analyst Avista Utilities jaime.majure@avistacorp.com 509.495.7839