

Avista Corp.

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December 20, 2021

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

Re: Docket ADV 1354 - Advice No. 21-09-G – Avista Utilities Schedule 470

Filing Center:

On November 23, 2021, Avista Corporation, dba Avista Utilities (Avista or the Company), filing tariff revision Advice No. 21-09-G. As stated in the original filing the purpose of these requested tariff revisions is to:

1. Adjust Schedule 469, “Public Purpose Funding Surcharge” (Public Purpose Charge or PPC), to reflect the rates required to fund the Company’s 2022 energy efficiency programs. Specifically, these funds support the delivery of energy efficiency programs administered by the Energy Trust of Oregon (ETO), the Avista Oregon Low-Income Energy Efficiency Program (AOLIEE), and Company energy efficiency program marketing and administrative costs.
2. Introduce Avista’s new tariff Schedule 470, “Voluntary On-Bill Repayment (OBR) Program”.
3. Remove, in its entirety, the Company’s tariff Schedule 488, “Promotional Concessions – Oregon”, as this tariff contains antiquated offerings that the Company has not utilized in many years.

Based on discussion with Oregon Public Utility Commission Staff (Staff), the Company was made aware of minor concerns that Staff had with Avista’s new tariff Schedule 470. As a result of the discussions, the Company has made revisions to the proposed Schedule 470 to alleviate Staff’s concerns as follows:

- Added additional clarity to provision 7 regarding situations when a customer pays less than the total amount billed.
- Removed reference to administration costs from provision 11. Provision 11 is applicable only to the loan amount and all interest and associated expenses that the loan servicer incurs.

- Removed the originally proposed provisions 12 and 13.
- Added a new provision 12 related to delinquency conditions or what happens when a customer misses their loan payments. Specifically, if a customer misses two consecutive loan payments, the loan servicer will remove the Energy-Smart loan from the Company's OBR program and follow-up with the customer directly.

Also, the Company would like to provide clarification to how administration costs required to offer the OBR program will be recovered. Administration costs incurred by the Company and the ETO, will be recovered through the PPC similar to other energy efficiency administration costs. As noted above, administration costs incurred by the loan servicer will be their sole responsibility.

With this revised filing Avista has included a Less Than Statutory Notice Application as it requests that the revised Schedule 470 be allowed to take effect on January 1, 2022.

Please direct any questions regarding this filing to me at shawn.bonfield@avistacorp.com or (509) 495-2782 or Jaime Majure at (509) 495-7839 or jaimemajure@avistacorp.com.

Sincerely,

/s/ Shawn Bonfield

Shawn Bonfield
Sr. Manager of Regulatory Policy & Strategy

AVISTA CORPORATION
dba Avista Utilities

SCHEDULE 470

VOLUNTARY ON-BILL REPAYMENT (OBR) PROGRAM

PURPOSE:

The purpose of this schedule is to describe the On-Bill Repayment (OBR) service that Avista will provide to its Oregon customers, administered through the Energy Trust of Oregon (ETO) using and a third-party loan servicer. This program will enable Customers to access financing for energy efficiency measures through specific ETO Programs. These loans can be repaid using the Company's OBR service, which allows the monthly loan repayment amount to be included on the Customer's natural gas utility bill. Loans established through ETO that utilize the Company's OBR component are hereafter referred to as "Energy-Smart Loans".

AVAILABLE:

To all residential Customers in the State of Oregon where the Company has natural gas service available, who have obtained a loan offered through a program managed by the ETO or its designated representatives approved by the Company, subject to the specifications contained herein.

APPLICABLE:

This OBR Program is applicable to all residential Customers taking service under Schedule 410 that have obtained an Energy-Smart Loan and for whom natural gas is the primary heat source.

DESCRIPTION:

Customers who obtain an Energy-Smart Loan will receive a loan repayment charge as a separately itemized charge on their monthly bill for natural gas service. This charge will remain until such time as:

- a. the Customer has failed to make timely loan repayments and delinquency has exceeded program limitations; or
- b. the Customer's natural gas service account has been closed; or
- c. the loan servicer provides written notification to the Company to remove the billing; or
- d. the repayment timeframe is completed.

SPECIAL PROVISIONS:

1. A Customer's decision to obtain an Energy Smart Loan will not affect the Customer's ability to establish credit with the Company, nor will it have an effect on a Customer's ability to receive reliable natural gas service. Any default on the Customer's Energy-Smart Loan will not result in collections

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January 1, 2022

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By

Patrick Ehrbar, Director of Regulatory Affairs



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SCHEDULE 470 (Continued)

VOLUNTARY ON-BILL REPAYMENT (OBR) PROGRAM

- activity or potential interruption of natural gas service from the Company. The Company will communicate this in writing to Customers who participate in the OBR program.
2. The Company is not responsible for determining credit worthiness for the loan, assessing cost-effective improvements, measuring, or verifying the work performed, financing or determining the monthly loan repayment amount to be billed.
 3. The loan servicer is responsible for determining the monthly billing amount for each loan and the number of months each Customer should be billed. The monthly billing amount and billing duration will be communicated to the Company only for purposes of billing the Customer.
 4. By obtaining an Energy-Smart Loan, the Customer will be responsible to remit the monthly loan repayment amount to the Company with their monthly bill payment for natural gas services.
 5. ETO or the loan servicer must obtain written consent from the participating Customer that states that the Customer agrees to allow the Energy-Smart Loan to be billed through Avista.
 6. The specified loan repayment amount will be billed according to the Customer's standard billing cycle and payment will be required by the due date assigned to the natural gas service charges. The Customer may not select a preferred due date that falls outside of the Company's standards for natural gas service charges.
 7. Monthly payments received from Customers participating in the OBR program will be allocated in the following manner:
 - a. All payments received by the Company toward the Customer's account that are less than the total amount billed for the combined charges related to the provision natural gas service and the monthly loan amount by the Company will first apply toward those charges related to the provision of natural gas service—including deposits, current charges, past due amounts and other services billed to the Customer by the Company for purposes of providing natural gas service. Any underpayment of the monthly loan amount will be added to the subsequent month's bill. Late payment fees and returned check charges will be charged in accordance with Rule No. 9 of this tariff.

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SCHEDULE 470 (Continued)

VOLUNTARY ON-BILL REPAYMENT (OBR) PROGRAM

- b. Any payment to the Customer's account that exceeds the full monthly amount due (overpayment) will remain on the Customer's account. The excess credit created by this overpayment will apply to future billing charges as designated above. The Customer may contact the Company to request refund of any overpayment. All intended payment(s) toward the loan amount in excess of the calculated monthly repayment amount due on the Customer's statement shall be paid directly by the Customer to the loan servicer.
8. The Company will not a) accept loan payoffs, b) issue refunds on loan payments (except as noted herein for overpayments), c) offer payment arrangements on loan amounts due, or d) allow energy assistance to be applied to loan balances. The Company will refer Customer disputes regarding such matters to the loan servicer.
 9. The Company is solely a billing agent for ETO and the loan servicer. Participating Customers shall hold Company harmless from any liability arising from or related to contractors' actions with regard to installation of energy efficiency measures resulting from this program.
 10. The Company is not responsible for any financial assurances given or guarantees as to the net financial benefit of dollars spent on energy efficiency upgrades as it relates to dollars saved on energy consumption that may be conveyed to participants in ETO-managed loan programs by the ETO, its contractors, or other parties.
 11. Recovery of the loan amount and all interest and associated expenses are the sole responsibility of the loan servicer.
 12. If a customer misses two consecutive Energy-Smart Loan payments, the loan servicer will remove the Energy-Smart Loan from the Company's OBR program and follow-up with the customer directly.
 13. The Company is not responsible for Customer questions and disputes related to the loan, or the Customer's perceived or real experience related to any portion of the loan or energy efficiency measures.
 14. ETO and the loan servicer must provide evidence to the Company's satisfaction of its compliance with the Federal Trade Commission's FACTA Identity Theft Prevention Program (16 C.F. R. § 681) upon request.
 15. The provision of OBR services will not affect the Company's compliance with all Division 21, Utility Regulation, Oregon Administrative Rules (OARs).

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SCHEDULE 470 (Continued)

VOLUNTARY ON-BILL REPAYMENT (OBR) PROGRAM

RULES AND REGULATIONS:

Service under this schedule is subject to the General Rules and Regulations contained in the tariff of which this schedule is a part, and to those prescribed by regulatory authorities.

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LESS THAN STATUTORY NOTICE APPLICATION

This document may be electronically filed by sending it as an attachment to an electronic mail message addressed to the Commission's Filing Center at puc.filingcenter@puc.oregon.gov.

BEFORE THE PUBLIC UTILITY COMMISSION OF OREGON

IN THE MATTER OF THE APPLICATION OF) UTILITY L.S.N. APPLICATION
Avista Corporation)
(UTILITY COMPANY)) NO. _____
TO WAIVE STATUTORY NOTICE.) (LEAVE BLANK)

NOTE: ATTACH EXHIBIT IF SPACE IS INSUFFICIENT.

1. GENERAL DESCRIPTION OF THE PROPOSED SCHEDULE(S) ADDITION, DELETION, OR CHANGE. (SCHEDULE INCLUDES ALL RATES, TOLLS AND CHARGES FOR SERVICE AND ALL RULES AND REGULATIONS AFFECTING THE SAME)
On November 23, 2021, Avista Corporation, dba Avista Utilities (Avista or the Company), filing tariff revision Advice No. 21-09-G requesting approval of new tariff Schedule 470, "Voluntary On-Bill Repayment Program". Based on discussion with Oregon Public Utility Commission Staff, the Company was made aware of minor concerns that Staff had with Avista's new tariff Schedule 470. As a result of the discussions, the Company has made revisions to the proposed Schedule 470 to alleviate Staff's concerns.

2. APPLICANT DESIRES TO CHANGE THE SCHEDULE(S) NOW ON FILE KNOWN AND DESIGNATED AS: (INSERT SCHEDULE REFERENCE BY NUMBER, PAGE, AND ITEM)
The proposed schedule 470 is a brand new schedule that is not yet on file.

3. THE PROPOSED SCHEDULE(S) SHALL BE AS FOLLOWS: (INSERT SCHEDULE REFERENCE BY NUMBER, PAGE AND ITEM)
Tariff Schedule 470, 470A, 470B, and 470C.

4. REASONS FOR REQUESTING A WAIVER OF STATUTORY NOTICE:
A Waiver of Statuory Notice is requested due to the requested effective date of January 1, 2022.

5. REQUESTED EFFECTIVE DATE OF THE NEW SCHEDULE(S) OR CHANGE(S): January 1, 2022

AUTHORIZED SIGNATURE /s/ Shawn Bonfield	TITLE Sr. Manager of Regulatory Policy	DATE 12/20/2021
PUC USE ONLY		
<input type="checkbox"/> APPROVED <input type="checkbox"/> DENIED	EFFECTIVE DATE OF APPROVED SCHEDULE(S) OR CHANGE	
AUTHORIZED SIGNATURE		DATE