



Avista Corp.

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Toll Free 800-727-9170

March 17, 2016

State of Idaho
Idaho Public Utilities Commission
472 W. Washington St.
Boise, ID 83702-5983

Attention: Ms. Jean Jewell, Secretary

RE: AVU-E-16-01/AVU-G-16-01 Reply Comments of Avista

Dear Ms. Jewell:

Attached for filing with the Commission is an original and seven (7) copies of Avista Corporation, doing business as Avista Utilities ("Avista" or "Company") reply comments related the Company's proposal for an order authorizing the accounting and ratemaking treatment detailed its Application related to costs the Company will incur by offering a fee-free payment program for its residential customers to pay by any method, including credit and debit cards. If you have any questions related to this filing please contact me at (509) 495-2782.

Sincerely,

Shawn Bonfield

Sr. Regulatory Policy Analyst
Avista Utilities
shawn.bonfield@avistacorp.com
509-495-2782

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3 REGULATORY AND GOVERNMENTAL AFFAIRS
4 AVISTA CORPORATION
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6 1411 EAST MISSION AVENUE
7 SPOKANE, WASHINGTON 99220-3727
8 TELEPHONE: (509) 495-4316
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10

11 BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

12	IN THE MATTER OF THE APPLICATION)	
13	OF AVISTA CORPORATION FOR AN)	CASE NO. AVU-E-16-01/
14	ACCOUNTING ORDER AUTHORIZING)	AVU-G-16-01
15	ACCOUNTING AND RATEMAKING)	REPLY COMMENTS
16	TREATMENT OF FEES FOR PAYMENTS)	OF
17	<u>MADE BY RESIDENTIAL CUSTOMERS</u>)	AVISTA UTILITIES

18

19 The Company appreciates the thorough review by the Commission Staff of Avista's
20 proposal for an order authorizing the accounting and ratemaking treatment detailed in its
21 Application related to costs the Company will incur by offering a fee-free payment program for its
22 residential customers to pay by any method, including credit and debit cards. Avista Corporation
23 ("Avista" or "Company") hereby submits reply comments in response to the Idaho Public Utilities
24 Commission Staff's ("Staff") comments dated March 14, 2016.

25 Avista appreciates the work and review done by Commission Staff and their support of the
26 Company's filing with certain recommendations. The following are the Company's response to
27 the Staff's recommendations:

28

- 1 1. Approve the Company's request for an accounting order allowing deferral and
2 recording of all transaction fees paid by the Company related to offering a fee-free
3 program for payment of bills by its Idaho residential customers until those costs can
4 be recovered through future rates.

5
6 RESPONSE: Avista agrees and supports Staff's recommendation.

- 7
8 2. Defer deciding on an amortization period until the Company asks to recover the
9 regulatory asset created by the deferral of transaction fees.

10
11 RESPONSE: Avista agrees with Staff's recommendation that the amortization period to
12 recover the regulatory asset created by the deferral of transaction fees can and should be
13 decided at the time the Company seeks recovery of the deferral.

- 14
15 3. Order the Company to directly assign the transaction costs of the fee-free program to
16 each jurisdiction, with fees attributed to Idaho customers being charged to Idaho.

17
18 RESPONSE: Avista agrees with Staff that transaction costs incurred should be directly
19 assigned to each state.

- 20
21 4. Require the Company to file a report with the Commission every six months detailing
22 fees incurred and participation rates, as proposed by the Company in its Application.

23
24 RESPONSE: Avista agrees with Staff's recommendation to file a report with the Commission
25 every six months detailing fees incurred, as well as participation rates as proposed by the
26 Company in its Application.

1 Again, the Company would like to recognize the work and thorough review of the
2 Commission Staff regarding its Application.

3 DATED at Spokane, Washington, this 17th day of March 2016.

4 AVISTA CORPORATION

5 By 

6 Kelly O. Norwood,
7 Vice President, State and Federal Regulation

8

VERIFICATION

STATE OF WASHINGTON)
)
County of Spokane)

Kelly Norwood, being first duly sworn, on oath deposes and says: that he is the Vice President of State and Federal Regulation for Avista Utilities; that he has read the above and foregoing Application, knows the contents thereof, and believes the same to be true.

Kelly Norwood

SIGNED AND SWORN to before me this 17th day of March 2016, by Kelly Norwood.



Patty L. Hanson
NOTARY PUBLIC in and for the State of Washington, residing at Spokane.

Commission Expires: 11-23-2017

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I have this 17th day of March, 2016, served the foregoing Reply of Avista Corporation in Docket No. AVU-E-16-001 and AVU-G-16-01 to the following parties, by mailing a copy thereof, properly addressed with postage prepaid to:

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Linda Gervais
Manager, Regulatory Policy