

KARL T. KLEIN
DEPUTY ATTORNEY GENERAL
IDAHO PUBLIC UTILITIES COMMISSION
PO BOX 83720
BOISE, IDAHO 83720-0074
(208) 334-0320
IDAHO BAR NO. 5156

RECEIVED
2016 MAR 14 PM 1:44
IDAHO PUBLIC
UTILITIES COMMISSION

Street Address for Express Mail:
472 W. WASHINGTON
BOISE, IDAHO 83702-5918

Attorney for the Commission Staff

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF AVISTA CORPORATION)
DBA AVISTA UTILITIES' APPLICATION FOR) CASE NO. AVU-E-16-01
AN ACCOUNTING ORDER RELATED TO) AVU-G-16-01
COSTS INCURRED TO OFFER CUSTOMERS A)
FEE-FREE PAYMENT PROGRAM.) COMMENTS OF THE
) COMMISSION STAFF

The Staff of the Idaho Public Utilities Commission provides these following comments to Avista Corporation's Application for an accounting order related to costs incurred to offer customers a fee-free payment program.

BACKGROUND

On January 13, 2016, Avista Corporation dba Avista Utilities applied for an Order authorizing it to record, as a regulatory asset, the costs it incurs to offer a fee-free payment program to its residential customers. The Company does not seek to recover the costs now. Rather, it requests an Accounting Order that will let it defer its opportunity to recover those costs through rates to a later date. The Company asks the Commission to process the Application by Modified Procedure.

Avista currently uses a third-party vendor (Kubra) to process one-time payments that residential customers make through Avista's web site or by telephone. The vendor collects a \$3.50 "convenience fee" if the customer pays by credit or debit card. The fee also applies if the