

**Avista 2020 Integrated Resource Plan (IRP)**  
**Idaho Sierra Club comments to Idaho Public Utilities Commission**  
**Aug 5, 2020 Telephonic Public Hearing**

Good evening, Commissioners. My name is Lisa Young. I'm the Director for the Idaho Chapter of the Sierra Club, speaking today on behalf of over 2,000 members and supporters in northern Idaho, many of whom are Avista customers. Our members are encouraged by Avista's plans to exit coal and move toward 100% clean energy in its 2020 Integrated Resource Plan, which we know serves the public interest and makes economic sense.

Our members are deeply concerned about the impacts of fossil fuel emissions and climate change on our region, from increased wildfires to decreased snowpack to more heat waves, and the effects that all of that has on their health and way of life - and that of their most vulnerable family members, friends, and neighbors. Our members also worry about the economic implications of these impacts on their families, local businesses, and the economy as a whole. We know that these climatic changes are taking place right now and are certain to continue into the future, and therefore firmly believe that any prudent long-range planning process should take that into consideration in the public interest of risk mitigation and economic security.

That's why we were confused and concerned by the fact that Avista's 2020 Integrated Resource Plan repeatedly mentions that the economic costs of climate impacts - known as the "social costs of carbon" - were only modeled and taken into consideration for Washington customers, and not for Idaho customers. Only Washington's "share" of resources and related emissions included the social cost of carbon, and Idaho's "share" did not. We're fully aware that the state of Washington has different laws and requirements around carbon emissions and energy resources, but it simply doesn't seem realistic, fair, or prudent to say that the very real economic risks and costs associated with carbon emissions suddenly stop at the Idaho border, and that Idaho customers don't deserve that same risk and cost analysis for the portion of the power they rely on in Avista's system.

Furthermore, with this and other examples, this IRP shows that Avista is conducting analyses and making planning decisions as if it has two separate grids - one in Washington and one in Idaho - and as a practical matter we just don't understand how that's possible, since in reality of course it's all one grid, and we worry that the more Avista goes down this path of doing separate analyses for Washington and Idaho (which it is continuing to bring up in its new IRP planning meetings) - we worry that Idaho customers are going to get the short end of the stick. Modeling their grid and making critical resource decisions in this fractured way is incredibly risky and dangerous, and exposes Idaho customers to huge financial and economic risks. Avista's approach just doesn't make sense to us, and we get the sense that Avista's not quite sure how to handle this, either, which makes us even more nervous. So we sincerely hope that Commission staff can look into this, take this issue seriously, and direct Avista to take a much more reasonable and equitable approach when evaluating risks, costs, and resource decisions across its entire service territory, so that Idaho customers don't ever get stuck with the short end of the stick.

On behalf of Sierra Club members, I thank you for your time tonight, for your attention on these important matters, and for choosing to hold this public hearing to hear Idaho customer concerns and interests.