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

October 08, 2025

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

RE: Avista Comments to Docket No. AR 641

Avista Corporation, dba Avista Utilities or (Avista or the Company), appreciates the opportunity to provide comments on the proposed Public Utilities Commission of Oregon (Commission) rulemaking relating to Division 001 rules. The Company supports the Commission's efforts to update these rules and looks forward to participating in the process.

The Company agrees with the proposed timeline and framework for the Rules Modules. At this time the Company has not identified any issues with the OARs referenced, however, as revised draft rules are proposed the Company may have input to offer at such time. Throughout the rulemaking process, advanced notice of scheduled workshops and meeting materials would be appreciated by the Company, allowing ample time to prepare and meaningfully contribute and participate during the workshops. Without time to review meeting materials in advance, it makes it difficult to actively engage in Commission workshops.

Thank you for the opportunity to provide comments related this rulemaking. If you have any questions regarding this response, please contact me at (509) 495-8325.

Sincerely,

/S/Athena Allen

Regulatory Affairs Analyst
Avista Utilities
(509) 495-8325
Athena.allen@avistacorp.com