Avista Corp.

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November 18, 2011

David Danner
Executive Director and Secretary
Washington Utilities & Transportation Commission
P. O. Box 47250
1300 S. Evergreen Park Drive S. W.
Olympia, Washington 98504-7250

DOCKET UG-111810

Dear Mr. Danner:

Attached for filing with the Commission is an electronic copy of the Company's SUBSTITUTE tariff sheet in Docket UE-111810:

Substitute First Revision Sheet 170-1.5 Canceling Original Sheet 170-1.5

The purpose of this filing is to revise the Company's tariff sheet listed above. After discussion with Staff we have changed the definition of a meter population. The previously submitted tariff sheet defined a meter population as meters of the same model, size, and purchased in the same year. The definition was changed to meters of the same model, size, and manufactured in the same year.

If you have any questions regarding this filing, please contact David Howell, Manager, Gas Design at 509-495-8719 or Shawn Bonfield at (509) 495-2782.

Sincerely,

Patrick Ehrbar

Manager, Rates & Tariffs Avista Utilities 509-495-8620 patrick.ehrbar@avistacorp.com

Enclosure