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September 9, 2013

***Via Electronic Mail***

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

Re: Docket No. UG-120715

Dear Mr. King,

Attached for filing with the Commission is Avista Corporation dba Avista Utilities (Avista or Company) "Supplement" to its "Two-Year Plan for Managing Select Pipe Replacement in Avista Utilities' Natural Gas System" and Avista Utilities "Protocol for Managing Select Aldyl A Pipe in Avista Utilities' Natural Gas System" (Master Plan) in compliance with the Commission's Policy on Accelerated Replacement of Pipeline Facilities with Elevated Risk in Docket No. UG-120715.

The purpose of this filing is to include the Company's potential rate impact analysis associated with the above referenced documents and in compliance with paragraph 55 of the Commission's Policy in Docket No. UG-120715, which states:

It is a reality that the prudent investment in a pipe replacement program plan will be borne by those the plan intends to protect: the gas company's customers. At the same time, the Commission will consider the rate impact of a pipe replacement

program plan, and expects each gas company to analyze rate impacts in each plan it files pursuant to this policy statement.

The attached potential rate impact analysis is a theoretical analysis over the next 20-years and is considered a best estimate at the time it was prepared, based on information known today.

If you have any questions regarding these comments, please contact me at [linda.gervais@avistacorp.com](mailto:linda.gervais@avistacorp.com) or 509-495-4975.

Sincerely,

*/s/Linda Gervais*

Manager, Regulatory Policy  
Avista Utilities