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August 14, 2007

Carol Washburn, Executive Secretary
Washington Utilities and Transportation Commission
P.O. Box 47250
1300 S. Evergreen Park Drive S.W.
Olympia, WA 98504-7250

**Re: Standards for Interconnection to Electric Utility Delivery Systems, WAC
480-108, Docket UE-060649**

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**Re: Public Utility Regulatory Policies Act Standards, Docket UE-060649
PURPA Section 111(d) Standards:
(11) – Net Metering
(12) – Fuel Sources
(13) - Fossil Fuel Generation Efficiency
(14) – Smart Metering (Time-based Metering and Communications)**

Dear Ms. Washburn:

On July 9, 2007, the Washington Utilities and Transportation Commission (Commission) issued a Notice of Opportunity to File Written Comments (Notice) on the proposed rule amendments governing the interconnection of customer-owned generating facilities to investor-owned electric utility delivery systems. On July 10, 2007, the Commission issued a second Notice in this Docket regarding whether new regulations are needed to govern the four PURPA Standards listed above. Avista Corporation (Avista) is providing the following comments in response to these Notices.

General Comments of Avista Corporation
Docket No. UE-060649

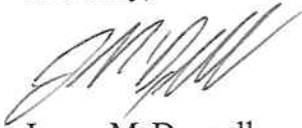
General Comments

In general, Avista supports the proposed amendments to the interconnection rules as developed by the Commission. Additionally, after review of PacifiCorp's comments, Avista generally supports PacifiCorp's comments filed in this Docket in response to the first Notice issued on July 9, 2007.

Avista also supports the Commission's determination not to adopt any new regulations addressing the four PURPA Standards. Furthermore, Avista supports the Commission's drafted Interpretive and Policy Statement in response to the second Notice issued on July 10, 2007, in this Docket.

Avista appreciates the opportunity to present their viewpoints and to participate in the stakeholder's review on these issues in the Commission's drafted amended rules and the drafted Interpretive and Policy Statement. Please direct any questions regarding these comments to the undersigned.

Sincerely,



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