December 14, 2006

VIA ELECTRONIC MAIL& ABC/LMI

Carole Washburn Executive Secretary Washington Utilities & Transportation Commission 1300 S. Evergreen Pk. Dr. S.W. PO Box 47250 Olympia, WA 98504-7250

R e: In the Matter of the Petition of Avista Corporation, d/b/a Avista Utilities for an Order Authorizing Implementation of Natural Gas Decoupling Mechanism and to Record Accounting Entries Associated with the Mechanism Docket Nos. UG-060518

Dear Ms. Washburn:

Enclosed please find the original and eight copies each of Public Counsel's Pre-Hearing Brief for filing in the above-entitled docket.

Sincerely,

Simon J. ffitch Assistant Attorney General Public Counsel Section (206) 389-2055

cc: Service List (E-mail & Federal Express)