



ATTORNEY GENERAL OF WASHINGTON

Public Counsel

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March 28, 2019

SENT VIA WEB PORTAL & ABC LMI

Mark L. Johnson
Executive Director and Secretary
Washington Utilities and Transportation Commission
1300 S. Evergreen Park Dr. SW
P. O. Box 47250
Olympia, Washington 98504-7250

Re: In the Matter of the Petition of Avista Corporation, d/b/a Avista Utilities,
For an Order Authorizing the Company to Revise its Natural Gas Book Depreciation Rates
and Authorizing Deferred Accounting Treatment for the Difference in Depreciation Expense.
Dockets UE-180167 & UG-180168 (*Consolidated*)

Dear Mr. Johnson:

Pursuant to Order 04 in the above-referenced docket, Public Counsel offers the following response. In concept, Public Counsel understands the Commission's decision to address issues related to the depreciation of Colstrip Units 3 and 4 in Avista's next General Rate Case. However, after discussions with the other settling parties, Public Counsel is concerned that the implementation of the condition set forth in Paragraph 35 is unclear. Public Counsel seeks to fully understand the condition and the Commission's intended implementation of the condition. Therefore, in accordance with WAC 480-07-750(2)(b)(ii) and WAC 480-07-840, Public Counsel requests a clarification of this Order by conference. In all other respects, Public Counsel remains supportive of the remaining non-Colstrip terms of the Settlement and the Order's treatment of these terms.

Please do not hesitate to contact me if there are any questions.

Sincerely,

/S/ Nina Suetake

NINA M. SUETAKE, WSBA No. 53574
Assistant Attorney General
Public Counsel Unit
(206) 389-2055

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ATTORNEY GENERAL OF WASHINGTON

To: Mr. Mark L. Johnson
Re: Docket UE-180167 and UG-180168 (*Consolidated*)
Date: February 26, 2019
Page 2 of 2

NMS/CM

Enclosures

cc: Service List (E-mail)

CERTIFICATE OF SERVICE

DOCKETS UE-180167 and UG-180168 (Consolidated) *Avista Electric and Natural Gas Depreciation Petition (2018)*

I HEREBY CERTIFY that I have this day served the *Letter of Public Counsel Accepting Condition to Joint Settlement Agreement* upon all parties of record in this proceeding, by electronic transmission to the email address(es) or by mailing a true and correct copy, postage prepaid, to each party or party representative listed in the Commission's master service list for this docket.

SERVICE LIST

HC = Receive Highly Confidential; C = Receive Confidential;
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<p>HC = Receive Highly Confidential; C = Receive Confidential; NC=Receive Non-Confidential</p> <p>COMMISSION STAFF:</p> <p>Brett Shearer, Office of the Attorney General Utilities & Transportation Commission 1400 S. Evergreen Park Drive S.W. P.O. Box 40128 Olympia, WA 98504-0128 brett.shearer@utc.wa.gov</p> <p>Chris Casey, chris.casey@utc.wa.gov Nash Callaghan, nash.callaghan@utc.wa.gov</p> <p>Betsy Demarco, betsy.demarco@utc.wa.gov Krista Gross, krista.gross@utc.wa.gov</p>	<p>AVISTA CORP:</p> <p>David Meyer 1411 E. Mission Avenue Spokane, WA 99220-3727 david.meyer@avistacorp.com avistadockets@avistacorp.com</p> <p>Pat Ehrbar, pat.ehrbar@avistacorp.com</p>
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DATED: March 28, 2019.

/s/ Chanda Mak
CHANDA MAK
Legal Assistant