

Avista Corp.
1411 East Mission PO Box 3727
Spokane, Washington 99220-3727
Telephone 509-489-0500
Toll Free 800-727-9170



January 9, 2004

**VIA ELECTRONIC FILING &
OVERNIGHT MAIL DELIVERY**

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

Re: Docket No. UG-021584 – Natural Gas Benchmark Mechanism

Dear Ms. Washburn:

Enclosed for filing with the Commission are an original and sixteen copies of Avista's Rely Brief for filing in the above-cited case.

This has been provided to the Commission by an electronic version with the original concurrently placed in overnight mail.

Questions regarding this filing should be directed to Liz Andrews at (509) 495-8601.

Sincerely,

A handwritten signature in cursive script that reads "Kelly Norwood".

Kelly Norwood
Vice President of State & Federal Regulation

Enclosures

c: Attached service list

**BEFORE THE WASHINGTON STATE UTILITIES AND TRANSPORTATION
COMMISSION**

In re the Matter of)	
WASHINGTON UTILITIES AND)	DOCKET NO. UG-021584
TRANSPORTATION COMMISSION,)	
)	
Complainant,)	
)	
vs.)	
)	
AVISTA CORPORATION d/b/a AVISTA)	
UTILITIES,)	
)	
Respondent.)	
)	

REPLY BRIEF OF AVISTA CORPORATION

AVISTA CORPORATION
David J. Meyer
Senior Vice President & General Counsel
Avista Corporation
1411 E. Mission Avenue
P.O. Box 3727
Spokane, WA 99220

TABLE OF CONTENTS

I. THE AFFILIATED NATURE OF AVISTA ENERGY'S INVOLVEMENT WITH THE MECHANISM.....	1
II. STAFF ERRONEOUSLY CONCLUDES THAT THE MECHANISM REWARDS AVISTA ENERGY FOR AVERAGE PERFORMANCE.....	8
III. STAFF'S CRITIQUE OF AVISTA ENERGY'S PARTICIPATION IN BASIN OPTIMIZATION IS MISPLACED	10
IV. THE MECHANISM DOES, IN FACT, COMPORT WITH THE COMMISSION'S POLICY STATEMENT ON INCENTIVE MECHANISMS	13
V. QUANTIFICATION OF BENEFITS.....	14
VI. CONCLUSION	16

CERTIFICATE OF SERVICE


I hereby certify that I have served the Reply Brief of Avista Corporation upon all parties of record in Docket No. UG-021584, by commercial parcel delivery company properly tendered with fees prepaid.

Carole Washburn
Executive Secretary
Washington Utilities & Transportation Commission
1300 S. Evergreen Park Drive SW
Olympia, WA 98504-7250

Robert Cromwell
Attorney General's Office
900 Fourth Avenue, Suite 2000
Seattle, WA 98164-1012

Donald T. Trotter, Senior Counsel
Attorney General of Washington
PO Box 40128
1400 S. Evergreen Park Dr. SW
Olympia, WA 98504-0128

Dated at Spokane, Washington this 9th day of January 2004.



Patty Olsness
Rates Coordinator