

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

WASHINGTON UTILITIES AND  
TRANSPORTATION COMMISSION,

Complainant,

v.

AVISTA CORPORATION, d/b/a  
AVISTA UTILITIES,

Respondent.

DOCKET NO. UE-100467 and

DOCKET NO. UG-100468

PUBLIC COUNSEL ANSWER TO  
AVISTA MOTION FOR WAIVER  
OF PAPER FILING  
REQUIREMENTS

1. Public Counsel files the following response to Avista Corporation's (Avista) Motion For Waiver of Paper Filing Requirements of WAC 480-07-510. Public Counsel does not take a position with respect to the request as it relates to the number of paper copies filed with the Commission. Because one paper copy has been filed for the record, the number of additional copies provided to the Commission is a matter for the Commission's discretion, based on its own needs, rather than a matter for other parties to address.
2. Public Counsel opposes the request for waiver of service of hard copies on parties. Avista appears to have done a creditable job of presenting the subject electronic material in a useful and user-friendly fashion designed to assist review. However, it remains the case that it is not practical or desirable for Public Counsel staff to review such lengthy detailed, technical material solely on a screen-by-screen basis. In addition, hard copy review provides benefits in

terms of convenience, functionality, and comprehension of the filing to the user, as compared to electronic-only format. Accordingly, it is likely Public Counsel would need to create a hard copy if Avista only provides only the electronic files. In that sense, Avista is simply externalizing the copying and compilation task to other parties. These expenses would ultimately be borne by ratepayers in any event. Since ratepayer representatives benefit from better access to documents, it is not unreasonable for Avista to provide these materials in the form most helpful to Public Counsel and other intervenors.

3. Public Counsel notes that Avista offers to provide a hard copy to any party requesting one, even if the requirement is waived. In the event Avista's motion is granted, Public Counsel requests that Avista provide a complete hard copy of the referenced material to Public Counsel at its earliest convenience.

4. Dated this 29<sup>th</sup> day of March, 2010.

ROBERT M. MCKENNA  
Attorney General

Simon J. ffitch  
Senior Assistant Attorney General  
Public Counsel