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July 14, 2010

VIA: Electronic Mail

David Danner
Executive Director and Secretary
Washington Utilities & Transportation Commission
1300 S. Evergreen Park Drive S. W.
P.O. Box 47250
Olympia, Washington 98504-7250

Re: Notice of Opportunity to File Written Comments - Docket No. U-100523

Dear Mr. Danner,

On April 7, 2010, the Washington Utilities and Transportation Commission (Commission) filed with the Code Reviser a Preproposal Statement of Inquiry (CR-101) to consider the need to develop a new rule and/or modify existing rules in WAC 480-90 (Gas Companies) and WAC 480-100 (Electric Companies) to address the use of electronic bills, notices of tariff revisions, bill inserts, documents in adjudicative proceedings, and reports required by settlement stipulations. On June 11, 2010, the Commission sent out a Notice of Opportunity to File Written Comments. Avista appreciates the opportunity to submit comments in the above-cited docket.

Avista supports the modification to the Commission's rules that would allow the Company to provide electronic bills, notices of tariff revisions, bill inserts, documents in adjudicative proceedings, and reports required by settlement stipulations in lieu of paper copies with one exception:

WAC 480-100-XXX Electronic information.

- (4) The following documents may not be provided solely by electronic means:
- (a) Notices of disconnection; and

The Company believes that if the customer has "opted in" to receiving information electronically, all communication should be provided to them electronically. A recent rulemaking in Idaho supported all notices be sent electronically with the customer's written consent.

IDAPA 31.21.01 (300.04) "Written notice" of utility's intent to deny or terminate service may be mailed or otherwise delivered to the applicant, resident, occupant, or customer. Written notice may be provided by electronic mail (i.e., e-mail) if the customer is billed electronically and separately consents in writing to "opt-in" to receiving electronic notification.

While current industry average for paperless billing is 9.6%, approximately 14% of Avista customers have opted for paperless billing. The Company's e-bill enrollment has and will continue to grow. We believe there is significant savings in reducing postage and printing costs as we move to electronic communications, which is a benefit to all customers.

Again, we appreciate the opportunity to comment and look forward to the continued discussion in the process.

If you have any questions regarding these issues, please contact me at 509-495-4975.

Sincerely,

/Linda Gervais/

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