



Avista Corp.
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December 9, 2010

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: Avista's Petition for an Order Modifying IRP Filing Date Under WAC 480-90-238

Dear Mr. Danner:

Pursuant to WAC 480-90-238(4) and WAC 480-07-370(b), Avista Corporation petitions the Washington Utilities and Transportation Commission for an order modifying the date for the filing of the Company's Natural Gas Integrated Resource Plan ("IRP"). The Company requests that the action date of this request be December 30, 2010. Attached is an original and 12 copies of the Company's petition. A copy has also been filed with the Commission's filing center electronically.

If you have any questions regarding this request, please feel free to contact Greg Rahn at 509-495-2048 or myself.

Sincerely,

A handwritten signature in blue ink that reads "Linda Gervais". The signature is written in a cursive style.

Linda Gervais
Manager, Regulatory Policy
Avista Utilities
509-495-4975
linda.gervais@avistacorp.com

**BEFORE THE
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

In the Matter of the Petition of)
AVISTA Corporation, dba Avista Utilities)
For an Order Modifying IRP Filing Date)
Under WAC 480-90-238)

DOCKET NO. _____

PETITION OF AVISTA CORPORATION
FOR AN ORDER MODIFYING IRP
FILING DATE

1 Pursuant to WAC 480-90-238(4) and WAC 480-07-370(b), Avista Corporation (“Avista,” or “Company”) petitions the Washington Utilities and Transportation Commission (“Commission”) for an order modifying the date for the filing of the Company’s Natural Gas Integrated Resource Plan (“IRP”). Please direct all correspondence related to this Petition to the following:

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2 The Company is required by WAC 480-90-238(4) to file its natural gas Integrated Resource Plan within two years after the date of which the previous plan was issued – i.e., in Avista’s case, by December 31 of each odd-numbered year. WAC 480-90-238(4) provides:

Unless otherwise ordered by the Commission, each natural gas utility must submit a[n] [IRP] within two years after the date on which the previous plan was filed with the Commission. Not later than twelve months prior to the due date of a plan, the utility must provide a work plan for informal commission review. (emphasis added)

3 The Company has identified three areas of significant workflow that currently overlap and occur in the fall of each year: PGA filings, Avista’s procurement planning, and IRP drafting/review/finalizing. Two of the three activities occur in advance of the start of each natural gas year in November – namely, PGA filings and procurement planning. The third activity (the IRP) in theory does not have to be performed at the same time as the PGA filings and the Company’s procurement planning – both of which place considerable demands on Avista and its stakeholders for review. Accordingly, Avista, Commission Staff, and other stakeholders who participate in the IRP process are recommending a permanent shift of that calendar of key IRP dates away from the fall. Provided as Attachment A is a proposed IRP “Activity Timeline,” shifting the filing of Avista’s next natural gas IRP from December 31, 2011 to August 31, 2012.

4 It should also be noted that, in accordance with WAC 480-100-238(4), the Company also files its Electric IRP on August 31st of each odd-numbered year. A shift in the required filing date for the natural gas IRP would provide a staggered filing for the Company’s two IRP’s, and avoid an overlap in participation in the two separate plans by the stakeholder groups.

5 Avista has discussed the shift in the natural gas IRP filing dates with Staffs in Washington, Idaho and Oregon, all of whom support the proposal and have agreed that this would allow for a more thorough and efficient review of the natural gas IRP, given conflicting priorities. Ultimately, the quality and thoroughness of the review process will

be enhanced. Moreover, the Company, for its part, agrees to provide a natural gas demand update to the Commission between the time this request is approved and when the Company would otherwise make its next natural gas IRP filing in August 2012, in order to allay any concerns about a delay in the filing of the 2012 IRP.

6 For these reasons, the Company respectfully requests that the Commission modify the filing deadline for the Company's natural gas IRP to August 31st of each even-numbered year, commencing with the filing of the 2012 IRP by August 31, 2012. WAC 480-90-238 contemplates that the Commission may, by order, modify the prescribed filing dates for good cause shown. The forgoing Petition enjoys the support of the stakeholders in the IRP process and is in the public interest.

DATED this 9th day of December, 2010

By: 
David Meyer
Vice President and Chief Counsel, Avista Corp.

Attachment A

Avista Natural Gas IRP Activity Timeline

	Existing Calendar/Schedule		Proposed Calendar/Schedule	
Work Plan Filed in Washington	December 31, 2010	Days	August 31, 2011	Days
Plan Kickoff (Staff check in / discuss plan)	March 6, 2011	65	November 20, 2011	81
TAC #1 Demand Forecast & DSM Methodology	April 5, 2011	30	December 20, 2011	30
TAC #2 Supply Infrastructure & Dist. Planning	May 5, 2011	30	January 19, 2012	30
TAC #3 Prelim SENDOUT Results & Proposed Cases	June 4, 2011	30	February 18, 2012	30
TAC #4 Final SENDOUT Results and Findings	July 19, 2011	45	April 3, 2012	45
Draft Distributed	September 2, 2011	45	May 18, 2012	45
Draft Comments Due	November 1, 2011	60	July 17, 2012	60
Filing Date	December 31, 2011	60	August 31, 2012	45

Red - PGA & Procurement Planning

Key IRP activities