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October 17, 2011

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

Dear Mr. Danner:

Attached for filing with the Commission is an electronic copy of the Company's filing of its proposed revisions to the following tariff sheets, WN U-29:

First Revision Sheet 170-f.1	Canceling	Original Sheet 170-f.1
Second Revision Sheet 170-f.2	Canceling	First Revision Sheet 170-f.2
Second Revision Sheet 170-g	Canceling	First Revision Sheet 170-g
First Revision Sheet 170-h	Canceling	Original Sheet 170-h
First Revision Sheet 170-h.1	Canceling	Original Sheet 170-h.1
First Revision Sheet 170-i	Canceling	Original Sheet 170-i
First Revision Sheet 170-i.1	Canceling	Original Sheet 170-i.1
Second Revision Sheet 170-j	Canceling	First Revision Sheet 170-j
First Revision Sheet 170-j.1	Canceling	Original Sheet 170-j.1
First Revision Sheet 170-k	Canceling	Original Sheet 170-k
First Revision Sheet 170-k.1	Canceling	Original Sheet 170-k.1
Second Revision Sheet 170-l	Canceling	First Revision Sheet 170-l
Second Revision Sheet 170-l.1	Canceling	First Revision Sheet 170-l.1
Second Revision Sheet 170-l.2	Canceling	First Revision Sheet 170-l.2
First Revision Sheet 170-l.3	Canceling	Original Sheet 170-l.3
First Revision Sheet 170-l.4	Canceling	Original Sheet 170-l.4
First Revision Sheet 170-l.5	Canceling	Original Sheet 170-l.5
Second Revision Sheet 170-l.6	Canceling	First Revision Sheet 170-l.6
First Revision Sheet 170-l.7	Canceling	Original Sheet 170-l.7
Second Revision Sheet 170-l.8	Canceling	First Revision Sheet 170-l.8
Second Revision Sheet 170-l.9	Canceling	First Revision Sheet 170-l.9
First Revision Sheet 170-l.10	Canceling	Original Sheet 170-l.10
First Revision Sheet 170-l.11	Canceling	Original Sheet 170-l.11

The purpose of this filing is to revise the Company's Meter Test Procedures consistent with industry standards and state codes. This filing is an outcome of Avista's efforts to review and

update standard practices while maintaining or improving the effectiveness of programs. Specifically, the revisions include updated Washington Advisory Codes (WAC's) referenced throughout the tariffs that have changed since previously filed, correct spacing issues, and other housekeeping revisions.

The proposed changes include:

- 1) Section 20, Part A – Reporting: Modify language to provide meter test results at the commission's request. WAC 480-90-353, "Gas companies – operations", does not contain a provision to submit the annual gas meter test results. Submission of the results in prior years has caused some confusion since the report is not required. As part of the existing PMC (Planned Meter Change-out) program Avista will complete the annual report and maintain it on file.
- 2) Section 20, Part E(3)(a) – Installed meters testing program: The current meter population is defined as meters of the same model, installed in the same State jurisdiction, and purchased in the same year. The proposed definition for a meter population will include meters of the same model, size, and purchased in the same year. The new definition removes the criteria to test meters by state. A statistical analysis of meter testing results for all three (3) states Avista operates in revealed that the mean accuracy and standard deviation of accuracy about the mean are similar for all three states and that any difference is not statistically significant, indicating that state test results can be combined. Refer to report dated June 2011 by David Howell. Elimination of "State" from the "Population" criteria will allow the results of all three states to be combined when determining the historical performance of the meter populations and reduce the annual PMC test requirements by approximately 25% which will provide a net benefit to rate payers while maintaining a PMC program with equivalent meter testing accuracy.
- 3) Section 20, Part E(5) - Installed turbine Meters: Changes expand turbine testing requirements to include both single rotor and dual rotor auto adjust meters.
- 4) Section 20, Part E(6) – Installed rotary meters: Changes provide clarification regarding necessary test requirements for rotary meters.
- 5) Accuracy: Additional clarification added to the accuracy requirement. The existing tariff fails to establish a prescribed accuracy expectation. It is currently implied that meter accuracy should be 100% +/- an allowable tolerance. The tariff revisions explicitly indicate that the target accuracy for all gas meters is 100%. Note: Additions made to numerous locations within the tariff to further describe accuracy requirements.

In conclusion, the Company requests approval to revise its Meter Test Procedures consistent with industry standards and state codes and for an effective date of November 21, 2011. There is no revenue change associated with this filing.

If you have any questions regarding this filing, please contact David Howell, Manager, Gas Design at 509-495-8719 or Shawn Bonfield at (509) 495-2782.

Sincerely,

A handwritten signature in black ink that reads "Patrick Ehrbar". The signature is written in a cursive style with a large initial "P" and a stylized "Ehrbar".

Patrick Ehrbar
Manager, Rates & Tariffs
Avista Utilities
509-495-8620
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Enclosure