

350 Spokane
James LeTellier
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9/12/2017

Washington Utilities and Transportation Commission
David Danner Chairman
Box 47250
Olympia, WA 98504-7250

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STATE OF WASH
UTIL. AND TRANSP
COMMISSION

Dear Commissioner Danner,

We here in Spokane have a very strong interest in Avista's Integrated Resource Plan (IRP), but it is difficult to bring a significant number of people to Olympia for your public hearings on this IRP. We know you get a lot of input from Puget Sound Energy electric utility customers in Western Washington and we fear we may not be getting the attention we deserve here in eastern Washington due to lack of participation in the hearings. As you know the squeaky wheel gets the grease. In light of this, we believe you should hold a hearing here in Spokane regarding the Avista IRP.

Avista is a terrific corporate partner for the city of Spokane and as such has been a generous supporter over the years. We are, however, very concerned with Avista's ownership in the Colstrip coal fired power plant which the EPA calculated to be the 3rd largest greenhouse gas source in the United States in 2015. Avista has shown no sense of urgency in divesting their interest in the Colstrip plant, or becoming a coal free provider. At present 3 Washington utilities, Puget Sound Energy, Avista, and PacifiCorp, have a combined ownership of 50% in the Colstrip generating Plant. Avista's 2015 Fuel Mix Disclosure Report, published May 2017, shows 38.44% natural gas, 35.43% hydro, 19.29% coal, and 3.2% wind. The 2015 average fuel mix for all Washington utilities is: 62.6% Hydro, 16.3% Coal, 13.4% natural gas, and 2.3% Wind.

Avista is out of step with other Colstrip owners. Portland General Electric must provide coal free power by 2030 per Oregon law. PacifiCorp has an accelerated depreciation schedule for Colstrip 3&4 ending 2032. Puget Sound Energy now has a recommended depreciation schedule for Colstrip 3&4 ending 2035. King County's Climate Action Plan and a resolution by the city of Olympia call for a phase out of coal fired electricity by 2025. Westmoreland, owner of the sole-source mine for Colstrip, reported to the Securities and Exchange Commission that the "estimated mine life" for existing permitted areas runs out by the end of 2024. Governor Inslee wants to take the "steepest possible glide path" to eliminate coal fired power and set a date for Washington to be coal free. Yet Avista would like to extend the life of the Colstrip plant beyond 2037,

Besides the obvious climate related emissions, there is an enormous environmental impact that will have to be cleaned up. This causes great concern for Avista ratepayers. As the other

owners of the Colstrip power plant divest their interest, Avista will bear an increasing burden for clean up as the useful life of the plant expires. By its depreciation schedule, PacifiCorp has determined this date to be 2032 and Puget Sound Energy puts the useful life date at 2035. The cleanup, remediation, and restoration will run into the hundreds of millions of dollars. There is an 800 acre pond complex around the plant. Toxic byproducts, such as lead, arsenic, mercury, cadmium, and boron are contained in the flyash slurry and sludge that fill these ponds. These ponds were unlined or clay lined when built in the 1970's and 1980's and only recently in the early 2000's were liners placed in some, but not all, of the ponds. Well water in the area is non-potable and water for the community of Colstrip is pumped 30 miles from the Yellowstone River. The sooner Avista can get away from this coal fired generation plant the better. Exiting Colstrip is complicated; the time for planning that move is now.


In closing, you can see there are a lot of issues and rate payer concerns that need to be factored into Avista's future Integrated Resource Plans. We ask that you give serious consideration into holding a hearing on our side of the mountains in Spokane. We look forward to hearing from you.

Best regards

Jim LeTellier 99019
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Best regards

Valerie Waley
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David Randall
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Robert Lewis
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Best regards

David D Sandstrom 99203
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Chelsey Bond 99208

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