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Avista Corporation
1411 East Mission P.O. Box 3727
Spokane, Washington 99220-3727
Telephone 509-489-0500
Toll Free 800-727-9170

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April 14, 2000

Washington Utilities and Transportation Commission
1300 S. Evergreen Park Drive S. W.
P.O. Box 47250
Olympia, Washington 98504-7250

Attention: Ms. Carole Washburn, Executive Secretary

Re: Opposition of Avista Corporation to Public Counsel's Motion to Reopen Centralia Docket
Docket No. UE-991255

Enclosed for filing are an original and nineteen copies of the Company's answer and opposition to Public Counsel's motion to reopen the Centralia Docket in the above referenced case. A copy has also been sent by electronic mail and fax on April 14, 2000. Questions regarding this filing should be directed to Kelly O. Norwood at (509) 495-4267.

Sincerely,

Thomas D. Dukich
Manager, Rates and Tariff Administration

Enclosure

c: See attached service list

AVISTA CORPORATION
CERTIFICATE OF SERVICE
DOCKET NO. UE-991255

I HEREBY CERTIFY that I have served the foregoing answer and opposition to Public Counsel's motion to reopen the Centralia Docket in the above referenced case by mailing a copy thereof, postage prepaid to the parties listed below:

Marjorie R. Schaer ALJ
Washington Utilities and
Transportation Commission
1300 S. Evergreen Park Drive, SW
Olympia, WA 98504-7250

George Galloway
Stoel Rives
900 SW Fifth Avenue, Suite 2600
Portland, OR 97204-1268

Robert Lavitt
Int'l Union of Operating Eng. Local 612
Schwerin Campbell Barnard LLP
18 West Mercer St., Suite 400
Seattle, WA 98119

Michael Brooks, Attorney
Duncan Weinberg Genzer & Pembroke
ICNU
1300 SW Fifth Ave, Suite 2915
Portland, OR 97201

Jim Lazar
Microdesign Northwest
1063 S Capitol Way South, Suite 202
Olympia, WA 98501

Matthew R. Harris
Summit Law Group
1505 Westlake Avenue N, Suite 300
Seattle, WA 98109

Robert D. Cedarbaum
Assistant Attorney General
1400 S. Evergreen Park Drive, SW
PO Box 40128
Olympia, WA 98504-0128

Matthew R. Wright
Vice President, Regulation
PacifiCorp
825 NE Multnomah Street, Suite 800
Portland, OR 97232


Christy Omohundro
Director of Regulation
Puget Sound Energy, Inc.
411 108th Avenue NE, Suite 300
Bellevue, WA 98004

Nancy Hirsh
Northwest Energy Coalition
219 First Ave S., Suite 100
Seattle, WA 98104

Simon ffitich
Office of Attorney General
900 Fourth Avenue, Suite 2000
Seattle, WA 98164-1012

John Bishop
IBEW, Local 125
Bennett, Hartman & Reynolds
851 SW Fifth Avenue
Portland, OR 97204

Dated at Spokane, Washington this 14th day of April 2000.



Jean T. Osterberg
Rates Coordinator

Gary A. Dahlke
 Paine, Hamblen, Coffin, Brooke & Miller LLP
 717 West Sprague, Suite 1200
 Spokane, Washington 99201-03505
 Telephone: (509) 455-6000
 Facsimile: (509) 838-0007

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 CLERK OF THE
 WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

Attorneys for Avista Corporation

BEFORE THE
 WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

In the Matter of the Application of)	
)	DOCKET NO. UE-991255
AVISTA CORPORATION)	
)	
For Authority to Sell its Interest in)	OPPOSITION OF AVISTA CORPORATION
the Coal-Fired Centralia Power Plant)	TO PUBLIC COUNSEL'S MOTION TO
_____)	REOPEN CENTRALIA DOCKET

I. INTRODUCTION

Avista Corporation ("Avista" or "Company") opposes Public Counsel's Motion to Reopen the record in the Centralia Docket. Public Counsel asserts that there is new information available now that was not available during Docket No. UE-991255 (the Centralia Case), and that this "new information" in Docket No. UE-991606 (Avista's General Rate Case) produces results that are "opposite" to that included in the Centralia Case. (Public Counsel's Motion to Reopen, P. 3, LL. 22-26)

As the Company will demonstrate below, the information that produces an increase in revenue requirement in Avista's General Rate Case is not new information. The information in question was clearly included in the record in the Centralia Case. Furthermore, an increase in revenue requirement associated with replacement power costs, in the near-term, is consistent with

the analysis in the Centralia Case, and with the decision that the sale of Centralia is in the public interest. Finally, the gain associated with the sale of Centralia assigned to Avista's customers by the Commission, offsets the near-term increased cost of replacement power, such that the net impact of the sale of Centralia in the General Rate Case is a net decrease in costs to customers.

II. ARGUMENT

A. There is No New Information at Issue

The replacement power costs included in Avista's General Rate Case (Docket No. UE-991606) in Exhibit 194 C are based on the Company's replacement purchase agreement. This is the same agreement that was provided to the parties, including Public Counsel, in the Centralia Case. The change in costs shown in Exhibit 194 C reflect the elimination of all of the Centralia resource costs, and inserting the replacement resource. Therefore, there should not be an issue regarding new information. As the Company will explain below, Public Counsel's concerns in its Motion to Reopen are related to an erroneous comparison of cost data by Public Counsel, and not new information.

B. Centralia Costs

In the Centralia Case, Avista provided a number of reasons supporting its decision to sell its share of the Centralia Generating Project. One of the primary reasons was the immediate requirement for significant capital expenditures related to the installation of pollution control equipment, including Scrubbers and Low Nox Burners (hereafter referred to as "scrubbers"). The Company testified that these immediate capital requirements would result in an increase in the ownership and operating costs of Centralia. (Exhibit T-303, P. 2, LL. 6-15)

Attachment A to this filing includes a copy of Page 1 of Exhibit 304 to Mr. Johnson's direct testimony in the Centralia Case. The last column of Attachment A shows the total cost of Centralia

in 1999 to be \$25.00/Mwh and increasing to over \$30.00/Mwh in 2002, an increase of over 20%.

This increase in costs is due primarily to the installation of scrubbers. Exhibit 324 in the Centralia Case (attached as Attachment B) included the 5-Year Capital Plan for the Centralia Project. The installation of the scrubbers is already in progress. Mr. Lazar, who testified on behalf of Public Counsel, recognized this near-term increase in the cost of Centralia in Exhibit 501 attached to his direct testimony in the Centralia Case (Exhibit 501, Page 7, Line 1 - Non-Fuel Revenue Requirement, and Line 6 - Ownership / Operating Cost).

The purpose for this overview of the Centralia cost increases is to demonstrate that the information in the Centralia Case clearly showed that the ownership and operating costs of Centralia will increase significantly in the near-term, whether the plant is sold or not. As we turn next to the issue of replacement power, it is important to keep in mind that the cost of Centralia presented in the Centralia Case prior to the installation of scrubbers was \$25.00/Mwh (for 1999). And, furthermore, the cost of Centralia *currently* being charged to Avista's customers in retail rates, *excludes* the cost of scrubbers, and would be comparable to the \$25.00/Mwh figure for 1999 as shown in Attachment A.

C. Cost of Replacement Power

There was significant discussion and debate in the Centralia Case regarding the future market price of power and the cost of replacement power assuming that the Centralia Project is sold. The Company has acquired a replacement resource for Centralia through December 31, 2003. As stated earlier, the cost of this replacement purchase was provided to parties in the Centralia Case, including Public Counsel. Although the actual pricing for the replacement purchase is confidential and cannot be disclosed in this document, the pricing in the agreement is above the \$25.00/Mwh cost of Centralia. Furthermore, although the Company did not agree with the market prices proposed by

Public Counsel in the Centralia Case, the market prices used by Mr. Lazer for the year 2000 and beyond were above \$25.00/Mwh.

D. The Record in the Centralia Case Shows that the Future Cost to Customers will Increase in the Near-Term Whether Centralia is Sold or Not

The point to the above summary of cost information presented in the Centralia Case is to demonstrate that the record in the case showed that the cost to customers will increase in the near-term whether Centralia is sold or not. The decision that had to be made in the Centralia Case, related to the sale of the Project, was which course of action would result in the lowest cost to customers in the long term, i.e., sell the Centralia Project or do not sell the Project.

If Centralia is not sold, the costs to customers will increase due to the installation of scrubbers, which is currently in progress. If Centralia is sold, the cost to customers will increase, at least in the near-term, due to the price of replacement power currently being higher than the existing cost of Centralia that is built into Avista's retail rates (i.e., approximately \$25.00/Mwh). In either event, the information in the Centralia Case showed an increase in costs to the Company's customers in the near-term. As will be explained later, however, the sale of Centralia brings with it the gain on the sale, which will result in a reduction of costs to customers.

Public Counsel presents an erroneous comparison in its Motion to Reopen. The analysis in the Centralia Case compares the future costs of Centralia with the future costs of replacement power from the market. The future costs of Centralia, in the analysis, include the significant capital costs associated with installing scrubbers, with a total cost of Centralia exceeding \$30.00/Mwh. Once the scrubbers are installed and in service, the cost of replacement power would be below the cost of Centralia.

As stated earlier, however, the cost of Centralia embedded in existing retail rates is comparable to the \$25.00/Mwh, because the scrubbers that are currently being installed have not yet been included in rates. Therefore, any change in costs associated with Centralia in Avista's General Rate Case will be compared against the, currently lower, costs of Centralia embedded in existing retail rates.

E. The Sale of Centralia Results in a Decrease in Costs to Avista's Customers in Avista's General Rate Case

In its Motion to Reopen, Public Counsel expresses concern regarding an "increase in rates" in the General Rate Case of \$4.1 million as a result of the sale of Centralia. (Public Counsel Motion to Reopen, P. 1, LL. 22-26.) Public Counsel's Motion, however, does not take into consideration all of the changes in costs associated with the sale of Centralia.

The Company is actually proposing a net decrease in rates in the General Rate Case related to the sale of Centralia. While it is true that the replacement power costs resulting from the sale will increase the revenue requirement, the sale also brings with it the gain of \$19 million (after-tax) that the Commission has assigned to ratepayers.

As Mr. McKenzie explained in hearings before the Commission in the General Rate Case, Avista is proposing to offset the Ice Storm costs with a portion of the Centralia gain, and to amortize the remainder of the gain to customers over an eight year period, consistent with that approved in the Company's Idaho jurisdiction. The Company's proposed accounting treatment for the gain will result in a revenue requirement reduction that exceeds the \$4.1 million increase in costs. Therefore, the net impact to Avista's customers in the General Rate Case from the sale of Centralia will actually be a net reduction in costs to the Company's retail customers.

In summary, if the sale of Centralia does not occur, customers will soon see a significant increase in costs due to the installation of scrubbers. If the sale of Centralia does occur, customers will see a net decrease in costs in the pending General Rate Case related to the sale.

III. REQUEST TO MOVE FORWARD WITH THE SALE WITHOUT DELAY

In hearings before the Commission in Avista's General Rate Case, the Company announced its intention to move forward with the sale of Centralia. In approving the sale of Centralia, the Commission stated in its order that the sale "is consistent with the interests of the ratepayers, shareholders, and the broader public, subject to appropriate accounting treatment." (Second Supplemental Order in Docket No. UE-991255, page 22, ¶ 63.) The Company believes the analysis in the Centralia Case supports this decision. In its Motion to Reopen, Public Counsel has made an improper comparison of cost data as explained above. The Company's proposal in its pending General Rate Case regarding the sale of Centralia will result in a net decrease in costs to its retail customers.

Public Counsel's Motion to Reopen is completely without merit and should be summarily and firmly rejected. Reopening the Centralia Case at this point will jeopardize the sale of the Project, and cause the Company and its customers to lose the benefits associated with the sale.

Avista requests that the Commission reject Public Counsel's Motion to Reopen as soon as possible so that the Company may move forward with the sale without delay.

DATED this 14th day of April 2000

PAINE, HAMBLÉN, COFFIN,
BROOKE & MILLER LLP

By: 

Gary A. Dahlke
Attorneys for Avista Corporation

**BEFORE THE
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

DOCKET NO. UE-991255

ATTACHMENT A

OPPOSITION OF AVISTA CORP TO PUBLIC COUNSEL'S MOTION TO REOPEN

Centralia Plant Cost with Scrubbing (Avista Corp's 15% Share)

Capacity	201 MW
Tons of Coal Available	800,000
Conversion	1.526 MW/ton
Annual Energy Production	1,220,800 MWh
O&M Cost	\$1.78 per MWh
Fuel Cost	\$17.90 per MWh
O&M Escalation	2.0%
Fuel Escalation	2.0%
Reserve Cost	\$1.50 per kW/mo
Reserves Escalation	2.0%
Wheeling Cost	\$1.00 per kW/mo
Wheeling Losses	1.9%
Wheeling Escalation after 2001	2.0%

Annual Energy Production	O&M Cost	Fuel Cost	Reserves Cost	Wheeling Cost	Exchange Wheeling Credit	Fuel, O&M Reserves & Nat Wheeling Cost	Fuel, O&M & Wheeling Cost	Capital Recovery Cost	Total Delivered Centralia Cost
Present Value Levelized	\$28,403,086	\$255,403,425	\$2,960,613	\$34,070,076	(\$2,611,907)	\$298,225,293	\$244	\$67	\$311
1999	\$2,169,150	\$21,848,000	\$253,260	\$2,933,892	-\$1,919,415	\$25,284,887	\$20.71	\$4.29	\$25.00
2000	\$2,340,750	\$22,284,960	\$258,925	\$2,939,691	-\$1,927,409	\$25,896,318	\$21.21	\$5.24	\$26.45
2001	\$3,307,350	\$22,730,659	\$263,492	\$3,011,126	-\$1,983,383	\$27,329,244	\$22.39	\$6.54	\$28.93
2002	\$3,315,750	\$23,185,272	\$268,762	\$3,074,103	-\$2,026,847	\$27,817,040	\$22.79	\$7.55	\$30.33
2003	\$2,481,000	\$23,648,978	\$274,137	\$3,138,408	-\$2,071,276	\$27,471,247	\$22.50	\$8.10	\$30.60
2004	\$2,530,620	\$24,121,957	\$279,620	\$3,204,070	-\$2,116,690	\$28,019,577	\$22.95	\$7.82	\$30.87
2005	\$2,581,232	\$24,604,397	\$285,212	\$3,271,118	-\$2,163,113	\$28,578,846	\$23.41	\$7.74	\$31.15
2006	\$2,632,857	\$25,086,484	\$290,916	\$3,339,581	-\$2,210,567	\$29,149,272	\$23.88	\$7.55	\$31.43
2007	\$2,685,514	\$25,568,414	\$296,734	\$3,409,489	-\$2,259,074	\$29,731,078	\$24.35	\$7.36	\$31.72
2008	\$2,739,224	\$26,110,382	\$302,669	\$3,480,873	-\$2,308,658	\$30,324,490	\$24.84	\$7.18	\$32.02
2009	\$2,794,008	\$26,632,590	\$308,723	\$3,553,764	-\$2,359,345	\$30,929,741	\$25.34	\$6.99	\$32.33
2010	\$2,849,889	\$27,165,242	\$314,897	\$3,628,196	-\$2,411,158	\$31,547,066	\$25.84	\$6.80	\$32.64
2011	\$2,906,887	\$27,708,547	\$321,195	\$3,704,199	-\$2,464,123	\$32,176,705	\$26.36	\$6.61	\$32.97
2012	\$2,965,025	\$28,262,718	\$327,619	\$3,781,809	-\$2,518,266	\$32,818,905	\$26.88	\$6.43	\$33.31
2013	\$3,024,325	\$28,827,972	\$334,171	\$3,861,060	-\$2,573,613	\$33,473,915	\$27.42	\$6.24	\$33.66
2014	\$3,084,812	\$29,404,531	\$340,855	\$3,941,985	-\$2,630,192	\$34,141,991	\$27.97	\$6.05	\$34.01
2015	\$3,146,508	\$29,992,622	\$347,672	\$4,024,622	-\$2,688,030	\$34,823,394	\$28.53	\$5.86	\$34.38
2016	\$3,209,438	\$30,592,475	\$354,625	\$4,109,006	-\$2,747,155	\$35,518,399	\$29.09	\$5.67	\$34.76
2017	\$3,273,627	\$31,204,324	\$361,718	\$4,195,176	-\$2,807,597	\$36,227,247	\$29.68	\$5.47	\$35.15
2018	\$3,339,099	\$31,828,410	\$368,952	\$4,283,168	-\$2,869,386	\$36,950,244	\$30.27	\$5.28	\$35.55
2019	\$3,405,881	\$32,464,979	\$376,331	\$4,373,023	-\$2,932,551	\$37,687,663	\$30.87	\$5.01	\$35.88
2020	\$3,473,999	\$33,114,278	\$383,858	\$4,464,779	-\$2,997,124	\$38,439,790	\$31.49	\$4.01	\$35.50

Exhibit 204
Docket No. UE-991255
W. Johnson, Avista
Page 1 of 2

BEFORE THE
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

DOCKET NO. UE-991255

ATTACHMENT B

OPPOSITION OF AVISTA CORP TO PUBLIC COUNSEL'S MOTION TO REOPEN

Project		Direct Project Cost (\$000)									
Proj #	BUCKET	Description	Overhead Related "x"	Prior Years	NO OH 1999	NO OH 2000	U-2 SWK 2001	U-1 SWK 2002	NO OH 2003	Future Years	Total Direct
PROJECTS < \$100K											
4701		COMMON, BLANKET FOR MISC. CAPITAL COSTS			10						10
4708	RR	COMMON, REPLACE CONVEYOR BELT			64						64
47682	RR	COMMON, REPLACE 8" BOILER DRAIN LINE			62						62
47671	RR	COMMON, REWIND OR REPLACE LARGE MOTORS AND TRANSFORMERS			52						52
47689	RR	COMMON, REWIND BCP MOTORS			50						50
47672	RR	COMMON, PURCHASE SMALL TOOLS			40						40
47703	RR	COMMON, REPLACE SAFETY DEPARTMENT VEHICLE			17						17
47700	RR	COMMON, REPLACE DRAFTING COPIER			0						0
47704	RM	COMMON, UPGRADE CEMS MOISTURE ANALYZER & EDR SOFTWARE			41						41
47681	RM	COMMON, RAISE SEWAGE TREATMENT PLANT OXIDATION POND			33						33
47702	MU	UNIT #2, INSTALL BOTTOM ASH IMAGING SYSTEM			98						98
47674	MU	COMMON, PURCHASE COMPUTER EQUIPMENT			87						87
Moved to O&M		UNIT #1, INSTALL MECHANICAL SEALS ON HOT AIR BLAST GATES			0						0
Moved to O&M		UNIT #2, INSTALL MECHANICAL SEALS ON HOT AIR BLAST GATES			0						0
47688	MU	COMMON, INSTALL PUMP FROM CPRO PONDS TO NORTH EFF POND			44						44
47680	MU	COMMON, REPLACE LOAD CENTER TRANSFORMER			32						32
47701	MU	COMMON, PROVIDE ELECTRICAL POWER TO CPRO PONDS			23						23
47687	MU	COMMON, PURCHASE INTERACTIVE TRAINING SYSTEM			23						23
47673	MAJ	COMMON, PURCHASE OFFICE EQUIPMENT			6						6
		COMMON, FUTURE YEARS BLANKET PROJECTS				800	800	800	800		3,200
		SUBTOTAL PROJECTS <100K	0	0	682	800	800	800	800	0	3,882
PROJECTS > \$100K											
47553	RR	COMMON, REPLACE 10TH FLOOR ROOF			650						650
47677	RR	COMMON, REPLACE CRAWLER 19			810						810
47670	RR	COMMON, REPLACE MISC PUMPS, MOTORS, VALVES, ETC.			144						144
47675	MU	UNIT #2, REPLACE COOLING TOWER FILL			1,157						1,157
	MU	COMMON, REPLACE EQUIPMENT FOR YEAR 2000 COMPLIANCE			143						143
47678	MU	COMMON, REPLACE FLYASH TRANSPORT SYSTEM CONTROLS			102						102
	RR	COMMON, REPLACE ROOF ON TURB AND DEMIN ROOM				725					725
	RR	COMMON, REPLACE JLG MAHLIFT				100					100
	MU	COMMON, REPLACE AUX BOILER CONTROLS				105					105
	RR	UNIT #1, REPLACE COOLING TOWER FILL				1,200					1,200
47482	RR	UNIT #2, REPLACE DISSIMILAR METAL WELDS	x	80			833				893
	RR	UNIT #2, REPLACE PCB TR's	x				600				600
	RR	COMMON, REPLACE DROTT MOBILE CRANE					340				340
	RR	COMMON, REPLACE #30 LOADER					250				250
47531	RR	UNIT #2, REPLACE HYDROGEN COOLERS	x	6			169				177
47686	RR	UNIT #2, REPAIR STRUCTURAL STEEL AND THROAT TUBES	x	163			79				242
	RR	UNIT #2, CRITICAL PIPING REPAIR (REPLACE HRH ELBOWS)	x				750				750
	RM	COMMON, REPLACE CEMS, UNIT #1 & UNIT #2					400				400
	MU	UNIT #2, INSTALL MILL INERTING SYSTEM					900				900
47421	MU	UNIT #2, REWIND GENERATOR (PHASE I, PARTS)	x	4,913							4,913
	MU	UNIT #2, REWIND GENERATOR (PHASE II INSTALLATION)	x				5,956				5,956
47461	MU	UNIT #2, REPLACE GENERATOR ROTOR (PHASE I, PARTS)	x	1,812							1,812
	MU	UNIT #2, REPLACE GENERATOR ROTOR (PHASE II, INSTALLATION)	x				827				827
	RR	UNIT #2, REPLACE AIR PREHEATER BASKETS	x				1,495				1,495
	MU	UNIT #2, REPLACE LODGE PRECIP AVC'S	x				168				168
	MU	UNIT #2, REPLACE #21 AND #23 AUX TURBINE ALARMS	x				115				115
	RR	UNIT #1, CRITICAL PIPING REPAIR (REPLACE HRH ELBOWS)	x				750				750
	RR	UNIT #1, REPLACE PCB TR's	x				600				600
47632	RR	UNIT #1, REPLACE HYDROGEN COOLERS	x	8			169				177
47420	MU	UNIT #1, REWIND GENERATOR	x	13			4,414	6,783			11,210
	MU	UNIT #1, INSTALL MILL INERTING SYSTEM					900				900
	MU	UNIT #1, REPLACE LODGE PRECIP AVC'S	x				168				168
	MU	COMMON, UPGRADE COAL RECLAIM AND GALLERY SYSTEMS					120				120
47661	MU	UNIT #1, REPLACE #11 & #12 AUX TURBINE ALARMS					115				115
	RR	COMMON, REPLACE CAT #27 SCRAPER							922		922
	RR	COMMON, REPLACE D8 CRAWLER							800		800
		SUBTOTAL PLANT PROJECTS <100K		0	682	800	800	800	800	0	3,882
		SUBTOTAL PLANT PROJECTS >100K		6,977	3,006	2,130	17,297	9,606	1,722	0	40,737
		UNFORSEEN		0	0	0	0	0	0	0	3,882
		TOTAL, REGULAR CAPITAL PROJECTS		6,977	3,888	2,930	18,097	10,406	2,822	0	48,501
CLEAN AIR PROJECTS											
		SCRUBBER AND LOW NOx BURNERS		2,766	7,347	36,146	66,716	64,668	29,386	0	198,029
		TOTAL, CLEAN AIR PROJECTS		2,766	7,347	36,146	66,716	64,668	29,386	0	198,029
		TOTAL, REGULAR PROJECTS		6,977	3,888	2,930	18,097	10,406	2,822	0	44,619
		TOTAL, ALL CAPITAL PROJECTS		8,763	11,635	39,076	73,813	78,654	31,908	0	240,648

Exhibit 324