

**BEFORE THE WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION**

In the Matter of Avista's Ten-year Achievable Conservation Potential and Biennial Conservation Target Report in Compliance with RCW 19.285 and WAC 480-109)	Docket No. UE-100176
)	
)	NW Energy Coalition Comments on Avista's Revised Compliance Report
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The NW Energy Coalition respectfully submits the following comments to the revised copy of Avista's I-937 Compliance Report that was submitted to the Washington Utilities and Transportation Commission (WUTC) on April 16, 2010.

We appreciate the work of the Company, Commission staff, Public Counsel and other stakeholders to work through concerns raised by the Coalition and other parties since the March 11 UTC open meeting. While some of our issues are resolved in this revised filing we continue to have the following concerns that were included in our comments to the Company in our original comments, our participation on the March 19th conference call, and on comments submitted on March 25, 2010.

1. We appreciate the revised language that clarifies the fact that electric to natural gas conversions are in addition to the conservation target established using the 6th Plan calculator. That said, we continue to request clarification that the report state that only savings from electric to natural gas conversions apply if the conversion installs high efficiency gas equipment. We believe that this should be included in the Conditions for Approval of 10-year Conservation Potential Assessment and Biennial Conservation Target.

2. The inclusion of distribution system efficiency measures is quite welcome. However, we continue to have concerns with the language on page 17 that refers to life-cycle analysis and the presumption that new equipment uses less energy than what is being replaced. This may well be the case, but we expect documentation and a commitment to use the most high efficiency replacement equipment appropriate and available for the application.

3. The Company has not discussed its evaluation of potential opportunities for efficiency improvements within power generation facilities owned by the Company. We recognize that efficiency improvements at the Company's hydroelectric projects will likely be counted toward the renewable energy standard but we request that the Company, at least, discuss generation efficiencies with the Triple E Advisory Board and include findings in its next biennial filing.

These comments are respectfully submitted this 23rd day of April, 2010.

NW Energy Coalition

A handwritten signature in black ink that reads "Nancy Hirsh". The signature is written in a cursive, flowing style.

Nancy Hirsh
Policy Director