

November 24, 2010

Electronic Filing

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: Updated Washington Avoided Cost Schedule Tariff WN U-28, Electric Service

Attached for filing with the Commission is one copy of the Company's proposed tariff revision:

Fourth Revision Sheet 62	Canceling	Third Revision Sheet 62
Twelfth Revision Sheet 62A	Canceling	Eleventh Revision Sheet 62A

The purpose of this filing is to update Avista's Washington Avoided Cost Schedule 62. This schedule will be used to provide baseline payments for Qualifying Facilities (QF's) that satisfies Avista's obligation to purchase power under Section 210 of the Public Utility Regulatory Policies Act of 1978 (PURPA).

In the Company's previous annual filings, the avoided cost rates for the upcoming 5 year period were updated. In addition to that annual change, the Company made other changes in this year's filing to provide better clarity and readability as it relates to the rates paid for various qualifying facilities. The most significant changes relate to "Firm" and "Non-Firm" energy rates. In the past, these terms typically referred to short-term (under one year, or "Non-Firm), and "Firm", which were those contracts between 1 and 5 years. The Company has changed "Firm" and "Non-Firm" as follows:

- 1. Small QF Power Rates (formerly "Firm") these rates are applicable for contracts between 1 and 5 years in length, and have a generating capacity of one megawatt or less.
- 2. Small QF Short-Term Power Rate (formerly "Non-Firm") these rates are applicable for contracts less than 1 year in length, and have a generating capacity of one megawatt or less.

In addition, the Company added a new section called "Large/Long-Term QF Power Rate". While the Company only has the obligation under WAC 480-107-095 to publish a standard tariff for QF's of one megawatt or less, the Company felt that providing the derivation of the Power Rate for projects with a term greater than 5 years, or greater than one megawatt, would provide further clarity.

Avista requests the tariff revision to become effective January 1, 2011. If you have any questions regarding this filing, please contact me at 509-495-8620.

Sincerely,

Catrick Shik

Patrick Ehrbar Manager, Rates & Tariffs