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May 13, 2011

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

Attention: Mr. David Danner, Executive Director and Secretary

TARIFF WN U-28, ELECTRIC SERVICE, and  
TARIFF WN U-29, NATURAL GAS SERVICE

Avista Corporation ("the Company") hereby submits the attached filing seeking Commission authorization to increase its rates and charges for its electric and natural gas services to its electric and natural gas customers in the state of Washington. With this filing the Company requests an overall increase in billed rates of 8.7% (9.1% in base rates) or \$38.3 million for electric service and 4.0% in billed rates (4.0% in base rates) or \$6.2 million for natural gas service, to be implemented at the end of the general rate case proceedings.

Additionally, Avista Corporation requests that the Commission **immediately suspend the operation of the general tariff revisions** included in this filing, and set the matter for hearing, including the establishment of a prehearing conference, at the earliest possible date in accordance with WAC 480-07-440(1)(a).

Service of documents pertaining to this filing should be to the following Avista Corporation representatives:

David J. Meyer, Esq.  
VP and Chief Counsel for  
Regulatory and Governmental Affairs  
Avista Corporation  
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Kelly O. Norwood  
VP, State & Federal Regulation  
Avista Corporation  
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(509) 495-4267  
(509) 495-8851 (FAX)

Enclosed with this filing are an original and two copies of the following proposed tariff sheets formatted with the coding required by WAC 480-80-105, and three copies in legislative format as required by WAC 480-07-510:

9 <sup>th</sup> Revision Sheet 1	Canceling	8 <sup>th</sup> Revision Sheet 1
9 <sup>th</sup> Revision Sheet 11	Canceling	8 <sup>th</sup> Revision Sheet 11
9 <sup>th</sup> Revision Sheet 21	Canceling	8 <sup>th</sup> Revision Sheet 21
9 <sup>th</sup> Revision Sheet 25	Canceling	8 <sup>th</sup> Revision Sheet 25
6 <sup>th</sup> Revision Sheet 25A	Canceling	5 <sup>th</sup> Revision Sheet 25A
9 <sup>th</sup> Revision Sheet 31	Canceling	8 <sup>th</sup> Revision Sheet 31
8 <sup>th</sup> Revision Sheet 41	Canceling	7 <sup>th</sup> Revision Sheet 41
8 <sup>th</sup> Revision Sheet 42	Canceling	7 <sup>th</sup> Revision Sheet 42
8 <sup>th</sup> Revision Sheet 44	Canceling	7 <sup>th</sup> Revision Sheet 44
9 <sup>th</sup> Revision Sheet 45	Canceling	8 <sup>th</sup> Revision Sheet 45
9 <sup>th</sup> Revision Sheet 46	Canceling	8 <sup>th</sup> Revision Sheet 46
8 <sup>th</sup> Revision Sheet 47	Canceling	7 <sup>th</sup> Revision Sheet 47
9 <sup>th</sup> Revision Sheet 47A	Canceling	8 <sup>th</sup> Revision Sheet 47A
10 <sup>th</sup> Revision Sheet 91	Canceling	9 <sup>th</sup> Revision Sheet 91
9 <sup>th</sup> Revision Sheet 101	Canceling	8 <sup>th</sup> Revision Sheet 101
9 <sup>th</sup> Revision Sheet 111	Canceling	8 <sup>th</sup> Revision Sheet 111
9 <sup>th</sup> Revision Sheet 112	Canceling	8 <sup>th</sup> Revision Sheet 112
9 <sup>th</sup> Revision Sheet 121	Canceling	8 <sup>th</sup> Revision Sheet 121
9 <sup>th</sup> Revision Sheet 122	Canceling	8 <sup>th</sup> Revision Sheet 122
9 <sup>th</sup> Revision Sheet 131	Canceling	8 <sup>th</sup> Revision Sheet 131
9 <sup>th</sup> Revision Sheet 132	Canceling	8 <sup>th</sup> Revision Sheet 132
9 <sup>th</sup> Revision Sheet 146	Canceling	8 <sup>th</sup> Revision Sheet 146
10 <sup>th</sup> Revision Sheet 150	Canceling	9 <sup>th</sup> Revision Sheet 150

In support of this filing, the Company has enclosed 19 copies of its prepared direct testimony and exhibits, as well as 3 copies of workpapers showing how test year data were adjusted. (An electronic copy of the workpapers was also provided to the Commission's accounting advisor, Mr. Maurice Twitchell) A summary document pertaining to the filing is provided as well as the financial reports and other documents required under WAC 480-07-510. An electronic version of this filing and all supporting documents is enclosed as well. The Office of Public Counsel has also been served with a copy of all such documents at the time of filing with the Commission.

Please note that certain sections of the exhibits of Karen S. Feltes, Robert L. Lafferty, Clint G. Kalich, and Scott J. Kinney, along with certain workpapers of Robert L. Lafferty, Scott J. Kinney, William G. Johnson, and Clint G. Kalich have CONFIDENTIAL information. The workpapers of Clint G. Kalich are only being provided electronically on CD due to their voluminous and electronic nature. Additionally as required by WAC 480-07-160(3)(a), the Company is also submitting an Attorney's Claim of Confidentiality regarding the submission of the unredacted versions of the above-referenced CONFIDENTIAL exhibits and workpapers. These workpapers should be treated as CONFIDENTIAL per WAC 480-07-160 and RCW 80-04-095.

In addition, as part of this filing, the Company is specifically requesting **deferred accounting treatment** of changes in generating plant operation and maintenance costs related to its Coyote Springs 2 natural gas-fired plant and its 15% ownership share of the Colstrip 3 & 4 coal-fired generating plants. Company witness Ms. Andrews discusses the request and associated justification in Exhibit No. \_\_\_ (EMA-1T).

Three copies of a "Notice of Tariff Change" are enclosed. This notice will be posted in the Company's offices coincident with the date of this filing. A service list is attached, with the parties on the service list receiving a complete copy of the pre-filed testimony and exhibits.

In compliance with WAC 480-07-510(3)(i) the Company states that there are no additional material affiliated transactions to report that otherwise were not already reported in the Company's annual Report of Affiliated Interest Transactions for the test year. The Company's annual report was filed on April 29, 2011. (See Dockets UE-110771 and UG-110772)

Additional copies of this filing, supporting testimony and exhibits are available from the Company upon request. Questions regarding this filing should be directed to Liz Andrews at (509) 495-8601.

Sincerely,

A handwritten signature in cursive script, appearing to read "Kelly Norwood".

Kelly Norwood  
VP, State & Federal Regulation

Enclosures

cc: See attached service lists

## CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I have served Avista Corporation's Direct Testimony and Exhibits in its Washington Electric and Gas General Rate Case Filing or summary document, if applicable, by mailing a copy thereof, postage prepaid to the following:

David Danner Executive Director & Secretary Washington Utilities and Trans. Comm. 1300 S. Evergreen Park Dr. SW Olympia, WA 98504-7250 <a href="mailto:ddanner@utc.wa.gov">ddanner@utc.wa.gov</a>	Simon ffitch Sarah Shifley Office of the Attorney General Public Counsel Section 800 Fifth Avenue, Suite 2000 Seattle, WA 98104-3188 <a href="mailto:simonf@atg.wa.gov">simonf@atg.wa.gov</a>
Mike Parvinen Washington Utilities and Trans. Comm. 1300 S. Evergreen Park Dr. SW Olympia, WA 98504-7250 <a href="mailto:mparvinen@utc.wa.gov">mparvinen@utc.wa.gov</a>	Ronald L. Roseman Attorney At Law 2011 14 <sup>th</sup> Avenue East Seattle, WA 98112 <a href="mailto:ronaldroseman@comcast.net">ronaldroseman@comcast.net</a>
Chuck Eberdt The Energy Project 1322 N. State St. Bellingham, WA 98225 <a href="mailto:Chuck_Eberdt@opportunitycouncil.org">Chuck_Eberdt@opportunitycouncil.org</a>	Don Trotter Washington Utilities & Trans. Comm. 1400 S. Evergreen Park Dr. SW Olympia, WA 98504-0128 <a href="mailto:gtrautma@utc.wa.gov">gtrautma@utc.wa.gov</a>
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I declare under penalty of perjury that the foregoing is true and correct.

Dated at Spokane, Washington this 13th day of May, 2011.



Paul Kimball  
Sr. Regulatory Analyst