

August 14, 2001

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

Re: Docket No. U-991301—Chapter 480-80 WAC Rulemaking

Dear Ms. Washburn:

Thank you for the opportunity to comment in the above-cited docket. Avista Utilities appreciates the improvements contained in the current Staff proposal as compared to its predecessor. The Company recommends the following portions of the Staff proposal be further considered.

The language for noticing proposed tariff changes [-19V] results in 58 days of notice if done through the most cost-effective manner (e.g., bill inserts). This would delay the filing 28 days beyond the existing 30 day requirement. This is because the proposed rule implies that the last customer in a billing cycle (in Avista Utilities' case, 28 days on average) must receive notice 30 days prior to the effective date. The alternatives to the billing insert option appear to be either 1) a direct mailing at a cost to our Company of over \$60,000 (postage and low-cost production for Washington electric customers) or 2) purchasing print advertisements and taking other noticing measures under section 2 of this rule.

Avista Utilities suggests that rule allows for the last customer in a billing cycle to be notified less than 30 days before the effective date of the filing.

The requirement for current cancelled sheet maintenance in the manner prescribed should be either reconsidered or reasons for this proposal further supported. The current and proposed notice requirement requires an explanation of the proposed rate change and how it relates to existing rates. Maintaining physical access (by web-site) to current cancelled tariffs seems redundant because customers can calculate the proposed rate impact without physically using cancelled tariffs. Furthermore, it is Avista Utilities' practice to always cooperate with customers who seek more information. The Company would be happy to provide current cancelled tariffs, or what we call historic rates, to customers upon request—a request that Rates Department staff cannot recall receiving more than half a dozen times in the past ten years. Our web-site tariff maintenance effort

is currently one part of one person's duties with two individuals trained as back-ups. The proposed rule would double the administration of our web-site maintenance for a web presentation similar to our tariff access in its present state. An expansion of the web-site tariff requirements may involve staffing up at a greater expense.

Current cancelled tariffs are currently available to customers upon request. Avista Utilities suggests that this business practice be allowed as a substitute for the current cancelled tariff maintenance provisions of the proposed rule.

After talking with Commission Staff, we understand that the formal hearing notice [-19X] is not intended to be in addition to the notice of proposed tariff changes.

Based on this clarification, the Company does not need to comment further on this section at this time.

On a minor note, Avista suggests that the definition contained in –19W be rewritten either as a definition of what is to be included or what is to be exempted rather than citing to items on the open public meeting agenda.

Please direct any questions on this matter to Bruce Folsom at (509) 495-8706.

Sincerely,

Thomas D. Dukich
Director, Rates and Regulation