

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

May 14, 2012

VIA: Electronic Mail

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: Additional Comments of Avista Utilities - Docket No. UE-112133

Dear Mr. Danner,

On December 21, 2011, the Washington Utilities and Transportation Commission (Commission) filed with the Code Reviser a Preproposal Statement of Inquiry (CR-101) to consider revising the standards for interconnecting electric generators in the service territories of electric investor-owned utilities in Washington Administrative Code (WAC) 480-108. The Commission filed the CR-101 in the above referenced Docket and asked for written comments from interested parties by January 30, 2012, in which Avista submitted comments.

On Thursday, March 29, 2012, the Commission held a stakeholder workshop in this rulemaking proceeding to review and discuss the comments submitted in response to the CR-101. Representatives from Avista attended and participated in the workshop and supported the decision to pursue informal collaborative discussions about possible rule changes as proposed by the Washington Public Utility District Association (WAPUDA), the Washington Rural Electric Cooperatives Association (WRECA) and the Association of Washington Cities (AWC). The

Interconnection Workgroup held its first meeting on Thursday, April 19, 2012, and has two more meetings scheduled for May 21, 2012 and June 20, 2012. Avista is planning on participating in the workgroup until its conclusion.

On April 13, 2012 the Commission provided a Notice of Opportunity for parties to file additional comments, to respond to comments previously filed in this rulemaking, or to provide additional information. At this time, the Company stands by its previously filed comments and does not have anything further to add to the record.

Avista thanks the Commission for the additional opportunity to comment and supports the Commission's desire to make the interconnection process safe, reliable and not overly burdensome for the Company and Avista customers.

If you have any questions regarding these comments, please contact Kenny Dillon at 509-495-4436 or myself at 509-495-4975.

Sincerely,

/s/Línda Gervaís

Linda Gervais Manager, Regulatory Policy Avista Utilities 509-495-4975 <u>linda.gervais@avistacorp.com</u>