

November 17, 2000

Via Facsimile

The Honorable Marjorie R. Schaer
Administrative Law Judge
Washington Utilities and Transportation Commission
1300 S Evergreen Park Drive S.W.
Olympia WA 98504-7250

Re: Washington Utilities and Transportation Commission v. Avista Corporation
Docket No. UE-991606

Dear Judge Schaer:

In response to the notice dated November 16, 2000, the Industrial Customers of Northwest Utilities ("ICNU") is providing the following comments with respect to the proposed Centralia bill credit for Schedule 25 customers.

ICNU would prefer that the credit be distributed through a check issued in December 2000, as proposed by Avista in its October 23, 2000 filing. However, if the Commission elects to adopt a bill credit approach, then the undistributed portion of the Centralia credit should continue to accrue interest until the entire credit is used.

In its October 23, 2000 filing, Avista included interest from the date of closing of the Centralia transaction in May 2000 to November 2000. It is possible that it will take more than two months for the entire bill credit to be used by some Schedule 25 customers. If the undistributed amount of the credit does not accrue interest, it would result in a windfall to Avista. Therefore, the undistributed amount of the credit should accrue interest from December 1, 2000, until the credit is fully used. ICNU appreciates the opportunity to comment on the Centralia bill credit.

Sincerely,

S. Bradley Van Cleve

cc: Service List