1	Q.	What is Avista doing regarding a long-term alternative to BPA transmission				
2	for the Lancaster plant?					
3	A.	Avista is in the process with BPA to jointly study interconnecting Avista's				
4	transmission	to the BPA Lancaster substation, where the Lancaster plant is currently				
5	interconnected. An extension of Avista transmission system to the BPA substation at Lancaste					
6	could only occur following power flow and reliability studies, negotiation of an interconnection					
7	agreement with BPA, and design and construction of the facilities. This entire process, already					
8	underway, is expected to take a minimum of two more years.					
9	Q.	Public Counsel witness Woodruff's testimony suggests that an extension of				
10	Avista transmission to the Lancaster plant would cost only one-tenth the BPA transmission					
11	costs. Will	an interconnection between the BPA and Avista transmission systems at the				
12	Lancaster substation provide benefits?					
13	A.	Yes. A transmission system interconnection between the BPA and Avista systems				
14	can provide an opportunity for additional benefits for customers, but it is not available to the					
15	Company for at least two years into the future as explained above.					
16	III. LANCASTER GAS TRANSPORTATION					
17	Q.	Please review the gas transportation arrangement for the Lancaster plant.				
18	A.	Gas supply for Lancaster is sourced from two delivery points, Alberta and Malin.				
19	Delivery capability is 25,742-966 Dth/day from Alberta and 25,00026,388 Dth/day from Mali					
20	for a total delivery capability of 50,74252,354 Dth/day.					
21	Q.	What is the amount of gas consumed by the Lancaster plant?				
22	A.	Under average temperature conditions, Lancaster consumes approximately 48,000				
23	Dth/day: 43	,000 Dth/day for the combustion turbine and 5,000 Dth/day for the duct burner.				
	Rebuttal Testimony of Robert J. Lafferty Avista Corporation Page 4 Docket No's. UE-090134, UG-090135 & UG-060518 (consolidated) REVISED 9/29/09					

Table 2 shows expected gas consumption at Lancaster for each month under average temperature conditions. The average consumption across all months is 47,975 Dth/day. At peak generation conditions, represented by an ambient temperature of 0 degrees Fahrenheit, Lancaster is estimated to consume approximately 51,400 Dth/day, slightly more less than the gas delivery capability of the gas transportation agreements. This figure is in-line with the Company's Coyote Springs 2 gas-fired CCCT plant which has very similar characteristics (size, heat rate). That plant has exceeded 51,000 Dth/day on various cold-weather days when Avista's load is at its peak.

Table 2							
Lancaster Gas Consumption and Transportation							
	Gas	Gas	Gas				
	Consumption	Transport	Transport	Excess			
	w/ Duct	from	from	Gas			
<u>Month</u>	<u>Burner</u>	<u>Alberta</u>	<u>Malin</u>	<u>Transport</u>			
	(dth/day)	(dth/day)	(dth/day)	(dth/day)			
Jan	49,778	25,966	26,388	2,576			
Feb	49,256	25,966	26,388	3,098			
Mar	48,775	25,966	26,388	3,579			
Apr	48,169	25,966	26,388	4,185			
May	47,347	25,966	26,388	5,007			
Jun	46,638	25,966	26,388	5,716			
Jul	45,961	25,966	26,388	6,393			
Aug	46,110	25,966	26,388	6,244			
Sep	46,920	25,966	26,388	5,434			
Oct	48,044	25,966	26,388	4,310			
Nov	49,098	25,966	26,388	3,256			
Dec	49,606	25,966	26,388	2,748			
Average	47,975	25,966	26,388	4,379			
Peak Day (1)	51,397	25,966	26,388	957			
1) Based on 0 degrees Fahrenheit							

Q. Does Avista have excess gas transport capacity for its combined cycle

11 combustion turbine plants?

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Rebuttal Testimony of Robert J. Lafferty Avista Corporation Docket No's. UE-090134, UG-090135 & UG-060518 (consolidated) A. No. As shown in Table 3 below, when both Lancaster and Coyote Springs 2 are operating at full capacity Avista will not have enough long-term firm gas transportation capacity

and will have to purchase additional capacity.

- Table 3 **Lancaster & CS2 Gas Consumption and Transportation** Lancaster CS2 Gas Gas Consumption Consumption Lancaster CS₂ Excess w/ Duct w/ Duct Gas Gas Gas Transport Transport **Transport** Month Burner Burner (dth/day) (dth/day) (dth/day) (dth/day) (dth/day) 43,000 Jan 49,778 50,739 52,354 (5,163)Feb 49,256 50,272 52,354 43,000 (4,174)Mar 48,775 49,634 52,354 43,000 (3,055)Apr 48,169 49,007 52,354 43,000 (1,822)47,347 48,276 52,354 43,000 (269)May 46,638 47,626 52.354 43.000 1,090 Jun Jul 45,961 46,963 52,354 43,000 2,430 46,110 47,151 52,354 43,000 2,093 Aug 43,000 Sep 46,920 47,994 52,354 440 48.044 49.030 52,354 43.000 (1,720)Oct Nov 49,098 50,017 52,354 43,000 (3,761)Dec 49,606 52,354 43,000 (4,777)50,525 43,000 Average 47,975 48,936 52,354 (1,557)Peak Day (1) 51,397 51,647 52,354 43,000 (7,690)Based on 0 degrees Fahrenheit for Lancaster and actual for CS2
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- Q. Where did the figure of 20 percent excess transportation capacity originate from as identified by Public Counsel Witness Woodruff?
- A. The figure of 20 percent excess gas capacity was noted in the Thorndike Landing evaluation (Exhibit RLS-6, page 11) in relation to an average consumption of 43,000 Dth/day. When the Lancaster duct burner is in operation, the gas delivery capacity is fully utilized. And when combined with the Coyote Springs plant, Avista is short of gas transportation when both