

April 23, 2018

Utilities and Transportation Commission Comments on Avista/HydroOne Merger

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Thank you for coming to Spokane and hearing the concerns of Avista rate-payers.

I'd like to address the proposed merger between Avista and HydroOne and its relationship to the climate impact of our electricity generation. I have four main points to make.

1. Avista/HydroOne should not allocate rate payer money to operate the Colstrip coal-fired electric generation plant past 2025. The cost effectiveness of coal as a source of energy continues to decline and the maintenance and operating expenses of the Colstrip Plant continue to rise. Avista rate payers cannot be expected to bear the burden of propping up this aging, obsolete generation plant. In short, Colstrip has gone from being an asset to a liability.
2. Avista/Hydro One needs to set a closure date for the plant. They have agreed to accelerate the depreciation schedule of the plant to 2027 from 2037. This new depreciation schedule assumes a remaining useful life of units 3 and 4 through December 31, 2027, but Avista/Hydro One have not committed to retiring the plant on that date. They must set a date and plan towards that event.
3. The area around the Colstrip Plant is an ecological disaster. There are 800 acres of leaking ash ponds that have created a toxic underground plume that has contaminated thousands of acres of aquifer. Avista/Hydro One should begin contributing to a designated fund for environmental cleanup and remediation, including plant decommissioning and demolition. Rate payer dollars should not be for this cleanup fund.
4. The Colstrip Generation Plant partners own approximately 300 miles of transmission lines that carry Colstrip power to intersect with BPA transmission lines at Townsend Montana. Avista owns approximately 200MW of transmission rights from Montana to Washington. This is a tremendously valuable asset and Avista should develop new renewable energy resources to replace the Colstrip power currently using these transmission rights.