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April 12, 2002

Secretary
Washington Utilities and Transportation Commission
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PO Box 47250
Olympia, WA 98504-7250

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RE: A-020334 Interpretive Statement

On March 28, 2002, the Commission distributed Draft Interpretive Statement A-020334 ("Statement") for review and comment. The purpose of the Interpretive Statement is to remove possible uncertainty about when a public service company undertakes to issue securities and, therefore, must file with the Commission pursuant to the requirements of RCW 80.08.040 and WAC 480-146-290.

Avista believes all the security filings it has made over the past two years have met the current requirements of RCW 80.08.040, WAC 480-146-290, and the spirit of the Draft Interpretive Statement. Avista also feels the Commission currently provides a thorough review of our security filings and responds with timely orders. Additionally, there is nothing in the Statement to suggest that there will be any material change to the current process, as it affects Avista.

In that light, Avista supports the language in Draft Interpretive Statement A-020334.

Sincerely,

A handwritten signature in cursive script that reads "Diane Thoren".

Diane Thoren
Assistant Treasurer