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July 26, 2010

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: Notice of Opportunity to File Written Comments - Rulemaking to Implement Revisions to
Greenhouse Gases Emissions Performance Statute – RCW 80.80.060
Docket No. UE-100865

Dear Mr. Danner,

On June 23, 2010, the Washington Utilities and Transportation Commission (Commission) filed with the Code Reviser a Preproposal Statement of Inquiry (CR-101) to consider adopting rules to implement revisions to RCW 80.80 regarding greenhouse gases emissions. These revisions are required by Senate Bill 5989 and House Bill 2129, which took effect July 26, 2009. This rulemaking proposes revisions to WAC 480-100 to reflect those changes. On June 25, 2010, the Commission invited comments on the discussion draft rules.

Avista has reviewed the draft rules and supports the proposed rulemaking revisions. The Company appreciates the opportunity to comment in the above-cited docket.

Avista Comments in Docket No. UE-100865

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If you have any questions regarding these issues, please contact John Lyons, Power Supply Analyst at 509-495-8515 or myself at 509-495-4975.

Sincerely,

//Linda Gervais//

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