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IDAHO PUBLIC
UTILITIES COMMISSION



www.idahoconservation.org

Idaho Conservation League

PO Box 844, Boise, ID 83701
208.345.6933

Idaho Public Utilities Commission
PO Box 83720
Boise, ID 83720-0074
November 6, 2009

RE: Idaho Conservation League Comments on Avista's 2009 Electric Integrated Resource Plan, Case No. AVU-E-09-09

Honorable Commissioners:

Thank you for the opportunity to comment on the Avista's 2009 Electric Integrated Resource Plan (IRP). For thirty-four years, the Idaho Conservation League (ICL) has been Idaho's voice for clean water, clean air, and wilderness—values that are the foundation to Idaho's extraordinary quality of life. As Idaho's largest state-based conservation organization we represent over 9,500 members, many of whom have a deep personal interest in protecting our clean air, clean water, and quality of life.

ICL's comments address three issues in Avista's 2009 IRP: Energy efficiency, renewable energy acquisition, and carbon emissions.

A. Energy Efficiency

ICL applauds Avista for planning to meet 26 percent of its new load growth through 2020 with energy efficiency, which is a 3.3 percent increase in conservation from the 2007 IRP. These goals are consistent with the Northwest Power and Conservation's Draft Sixth Power Plan, which calls for 5800 averages megawatts of conservation over the next 20 years. The Draft 6th Plan finds that all new demand can be met with efficiency and renewable energy.

ICL encourages Avista to continue looking for more opportunities in energy efficiency and demand side management, including both customer programs and transmission and distribution systems. Energy efficiency is cheapest and cleanest way to meet Idaho's energy needs, and there are still many opportunities to capture energy savings.

B. Renewable Energy

ICL is pleased to see the Preferred Resource Strategy (PRS) includes 350 megawatts of wind generation and encourages the Company to explore other non-wind renewable energy options. The Idaho Energy Plan calls for efficiency and renewable energy to be the first resources acquired to meet growing energy needs. The acquisition of renewable energy will allow Avista to meet its requirements under Washington's Renewable Portfolio Standard (RPS) and will help the

Company be better prepared for a federal RPS. In addition, a more diverse energy portfolio reduces risk for the Company and its ratepayers by mitigating fuel price volatility.

C. Carbon Emissions

ICL is also pleased to see no *significant* increase in carbon emissions over the 20-year timeframe in the PRS but strongly encourages Avista to develop a strategy to actually reduce carbon emissions. Focusing on developing a more diverse renewable energy portfolio and increasing energy savings with efficiency may allow the Company to avoid or postpone building new natural gas fired generation, which would lower Avista's carbon emissions. This also benefits ratepayers by avoiding natural gas price volatility.

Thank you for the opportunity to comment on Avista's 2009 IRP. If you have questions about our interest in this matter, please contact me at (208)345-6933 ext. 12 or at bbridge@idahoconservation.org.

Sincerely,

A handwritten signature in black ink that reads "Betsy Bridge". The signature is fluid and cursive, with a long horizontal flourish extending to the right.

Betsy Bridge
Energy Efficiency Associate