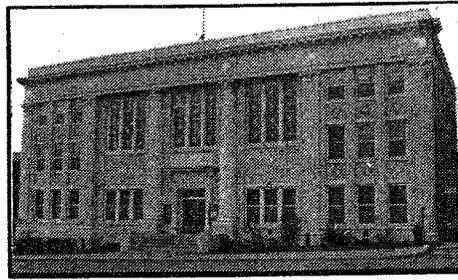


Board of  
County Commissioners  
245-2234

Clerk District Court  
Auditor and Recorder  
245-3212

Treasurer and  
Tax Collector  
245-2421



Prosecuting Attorney  
245-2564

Assessor  
245-2821

Sheriff  
245-2555

Coroner  
245-2611

*County of Benewah*  
701 W. College Avenue  
St. Maries, Idaho 83861

November 21, 2011

Commission Secretary  
Idaho Public Utilities Commission  
P. O. Box 83720  
Boise, Idaho 83720-0074

Re: Case No. AVU-E-11-04

To Whom It May Concern:

In regard to the matter of Avista Corporation's 2011 Electric Integrated Resource Plan, we offer the following concerns and objections.

The proposed 2011 Integrated Resource Plan considers four policies. The plan states each of the four policies represents a different policy alternative beginning in 2015.

Policy one recommends a Regional Cap and Trade Regime. Policy two recommends a National Cap and Trade Regime.

The regional program was envisioned as a precursor to a national cap-and-trade system. Now that federal cap-and-trade legislation seems to have lost most of its momentum, critics say the regional program should be abandoned also to avoid unfair increases in electricity in the region. Some opponents have even billed the program as a backdoor tax hike.

Several northeastern states have recently announced plans to withdraw from Regional Greenhouse Gas Cap and Trade Programs, such as the Regional Greenhouse Gas Initiative, a cooperative effort to reduce greenhouse gas emissions from utility sources in Connecticut, Delaware, Maine, Maryland, Massachusetts, New Hampshire, New Jersey, New York, Rhode Island and Vermont. These ten states originally agreed to cap and reduce energy sector carbon dioxide emissions by ten percent by 2018. Regional Greenhouse Gas Initiative has come under attack for both the ineffectiveness of the program and its adverse impact on electrical ratepayers.

We have already experienced astronomical electrical rate increases in our county over the last few years and we have grave concerns the proposed IRP will cause even further increases. The plan states, "Avista says the present value of the investment required to support the 2011 Preferred Resource Strategy is just over \$0.84 billion; the nominal total

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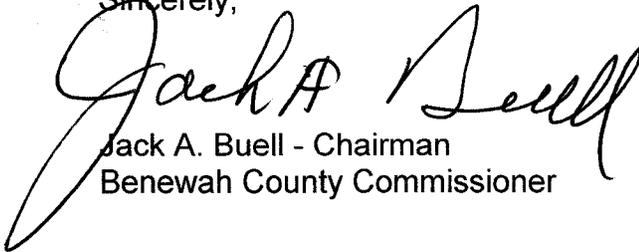
capital expense is \$1.7 billion over the IRP timeframe.” Assuming the timeline for the plan is twenty years; \$42 million would be collected from the ratepayers annually to meet the \$0.84 billion figure. If the \$1.7 billion figure is the projected target; \$85 million would need to be collected annually from the ratepayers. In the current and projected economy these rate increases will have dire impact on our industries, businesses and residents within Benewah County.

The third policy is a National Carbon Tax. This tax would further increase already exorbitant energy and gas prices. This option would also negatively impact the industries, businesses and residents within Benewah County.

The fourth policy is, The Absence of any Greenhouse Gas Policy. Recent scientific data prepared by NASA and world renowned meteorologists does not support the Greenhouse Gas theory. The data reported by these scientists indicates no significant changes in the ozone layer. Gases are able to travel freely into the stratosphere and are not being trapped in the ozone layer. This data does not support the greenhouse gas/global warming theory.

We recognize the importance of planning ahead but we also recognize the importance of basing our decisions on sound science and economics. We strongly urge Avista to rethink their proposed policies and develop alternative ones that will have a positive impact on our environment and also serve the needs of the industries, businesses and citizens of Benewah County.

Sincerely,

A handwritten signature in black ink that reads "Jack A. Buell". The signature is fluid and cursive, with a large loop at the beginning and end.

Jack A. Buell - Chairman  
Benewah County Commissioner