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January 7, 2010 JAN -8 AM 10:10

IDAHO PUBLIC  
UTILITIES COMMISSION

**Via Email and Overnight Mail**

Jean Jewell, Secretary  
Idaho Public Utilities Commission  
472 W. Washington Street  
Boise, ID 83720-0074  
Email: [jean.jewell@puc.idaho.gov](mailto:jean.jewell@puc.idaho.gov)

**Re: IPUC Case No. GNR-E-08-03**

Dear Ms. Jewell:

On November 26, 2008, the Northwest and Intermountain Power Producers Coalition ("NIPPC") filed a petition with the Idaho Public Utilities Commission ("Commission") requesting that the Commission open a generic investigation into the desirability of initiating competitive bidding guidelines for the procurement of supply-side resources by the electric utilities under the Commission's authority.<sup>1</sup> As a result, the Commission opened the above-referenced generic proceeding. As a utility that is under the Commission's authority, Avista Corporation ("Avista") has been monitoring this proceeding.

On December 22, 2009, NIPPC filed a motion ("Motion") requesting that the Commission issue a procedural schedule in the above-referenced proceeding. NIPPC further requested that the Commission narrow the scope of the proceeding to "eliminate its generic status and limit the issues to be explored to only Idaho Power." NIPPC Motion at 3. In its Motion, NIPPC noted that the other two relevant electric utilities, including Avista, already comply with competitive procurement rules in the other states in which they operate and that there is no need to subject those utilities to duplicative rules. *Id.* Avista does not object to NIPPC's Motion and agrees that the above-referenced proceeding should be narrowed to apply only to Idaho Power.

Avista further agrees with NIPPC that it is not necessary for Idaho to develop competitive procurement rules for utilities that already comply with competitive procurement rules in other states. Avista is subject to the State of Washington's competitive procurement rules, which are codified in the Washington Utilities and Transportation Commission's ("WUTC") rules at WAC

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<sup>1</sup> The Industrial Customers of Idaho Power, the J.R. Simplot Company, and the Idaho Irrigation Customers Association, Inc. joined in NIPPC's petition.

480-107-001, *et seq.*<sup>2</sup> Avista complies with the WUTC's competitive procurement rules with regard to all resource acquisitions that are subject to those rules.

As stated above, Avista does not object to NIPPC's request to narrow the above-captioned proceeding to apply only to Idaho Power. To the extent the Commission grants NIPPC's request to narrow the proceeding only to Idaho Power, Avista respectfully requests that the Commission expressly state in its order that any rules developed or promulgated in the proceeding will apply only to Idaho Power and will not apply to any other utility that is subject to and complies with the competitive procurement rules of another state.

Thank you for your attention to this matter. Please do not hesitate to call me if you have any questions.

Sincerely,



Michael G. Andrea  
Senior Counsel

cc: Scott Woodbury  
Rick Sterling  
Randy Lobb  
Kelly Norwood  
David Meyer  
Linda Gervais  
Clint Kalich  
Bart Kline  
Stacey Kusters  
Peter Richardson

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<sup>2</sup> The relevant WUTC rules can be accessed at the following link:  
<http://apps.leg.wa.gov/wac/default.aspx?cite=480-107>