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AVISTA Corp.

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UTILITIES COMMISSION

January 18, 2011

**Via Email and Overnight Mail**
Jean Jewell
Idaho Public Utilities Commission
472 W. Washington Street
Boise, ID 93702
Email: jean.jewell@puc.idaho.gov

Re: Reply Comments of Avista Corporation
IPUC Docket No. GNR-E-10-04

Dear Ms. Jewell:

Please find enclosed for filing an original and seven copies of the Reply Comments of Avista Corporation in the above-referenced docket. Please let me know if you have any questions regarding this filing.

Sincerely,

Michael G. Andrea
Senior Counsel

Enclosures

cc: Service List

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BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

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| IN THE MATTER OF THE JOINT PETITION OF IDAHO POWER COMPANY, AVISTA CORPORATION, AND ROCKY MOUNTAIN POWER TO ADDRESS AVOIDED COST ISSUES AND JOINT MOTION TO ADJUST THE PUBLISHED AVOIDED COST RATE ELIGIBILITY CAP. | ) | CASE NO. GNR-E-10-04<br><br>REPLY COMMENTS OF AVISTA CORPORATION |

Pursuant to the Notice issued by the Idaho Public Utilities Commission ("Commission") on December 3, 2010 in Order No. 32131 ("Notice"), Avista Corporation ("Avista") respectfully submits the following reply comments in support of reducing the eligibility cap for the published avoided cost rate.

## I. Background

On November 5, 2010, Avista Corporation along with Idaho Power Company and PacifiCorp, dba Rocky Mountain Power, (collectively, the "Utilities") filed a Joint Petition requesting the Commission to initiate an investigation into various avoided cost issues regarding PURPA Qualifying Facilities ("QFs") under the Public Utility Regulatory Policies Act of 1978 ("PURPA"). Among the issues raised in the Joint Petition, the Utilities requested that the Commission issue an order adjusting the published avoided cost rate eligibility cap for QFs from 10 average megawatts ("aMW") to 100 kilowatts ("kW") effective immediately.

On December 3, 2010, the Commission issued the Notice in which it, among other things, set a modified procedure comment schedule with which to develop a record for its decision regarding the Joint Petition and Motion's request to lower the published avoided cost rate eligibility cap. Order No. 32131, Case No. GNR-E-10-04. In the Notice, the Commission bifurcated this proceeding into two phases. In the first phase, the Commission will address only the Utilities' request to reduce the eligibility cap. Initial comments for this first phase were due on December 22, 2010. Reply comments are due on January 19, 2011.

## II. Reply Comments

The Federal Energy Regulatory Commission ("FERC") requires states to have a standard rate offering for projects with a design capacity of 100 kW or less.[1] States may require standard rates for purchases from QFs that have a design capacity greater than 100 kW.[2] In the recent past, the Commission has set the eligibility cap for the published avoided cost rates at 10 aMW. QFs larger than 10 aMW are eligible for an avoided cost rate that is determined through negotiations with the utility using the utility's "IRP Methodology" as the basis for determining the applicable avoided cost rate.[3]

As Commission Staff notes in its comments, "one of the primary justifications for limiting eligibility for published rates to 10 aMW has been to recognize that developers of small QFs are less likely to be large, well-funded organizations, capable of sophisticated contract negotiations."[4] It is not merely developers of small QFs that are taking advantage of published avoided cost rates.[5] Rather, developers of large wind projects are splitting those projects into

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[1] Staff Comments at 3; 18 C.F.R. § 292.304(c)(1).
[2] 18 C.F.R. § 292.304(c)(2).
[3] Staff Comments at 3-4.
[4] Staff Comments at 4.
[5] Staff Comments at 4 (stating: "It has become quite common for large wind projects to be structured as multiple, separate QFs, each 10 aMW in size, but collectively 60, 80 or 120 MW in size. In fact, nearly all new wind

separate smaller QFs in order to take advantage of the published avoided cost rate (this practice is sometimes referred to herein as "disaggregation").[6] This practice raises several concerns. Those concerns include, among others, as Commission Staff recognized: (1) an artificial mismatch between the method used to establish a project's avoided cost rates and the collective size of the project; (2) inefficient turbine layouts that do not maximize the value of Idaho's wind resource; and (3) utilities are forced to acquire generation from large QFs at standard rates without regard to the utility's need for new generation.[7]

Ultimately, forcing utilities to pay standard published avoided cost rates to larger QFs can, as Staff recognized, have adverse implications, including higher rates for the utilities' customers.[8] Avista has QF requests in Idaho for 450 MW of development, 350 MW of which is for wind QFs.[9] The addition of such resources to Avista's system is substantial relative to Avista's estimated Idaho peak load of 617 MW, and minimum load of 232 MW. Avista has a direct interest in this proceeding.[10] Accordingly, Avista urges the Commission to adopt Staff's recommendation to lower the published avoided cost rate eligibility cap from 10 aMW to 100 kW effective December 14, 2010, while the Commission further investigates this issue. In addition to the interim recommendation to reduce the eligibility cap from 10 aMW to 100 kW while the Commission conducts its investigation of this issue, Staff provides four long-term alternatives to address the disaggregation problem. Avista, as discussed more fully below, supports Staff's first proposed alternative of lowering the eligibility cap indefinitely as the best solution to the disaggregation issue. Although Staff recommends that the eligibility cap only be

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contracts submitted for Commission approval in recent years are collections of two or more adjacent 10 aMW projects, each with common ownership and developers.").

[6] Staff Comments at 4.

[7] Staff Comments at 4-5.

[8] *See* Staff Comments at 5.

[9] Appendix A lists Avista's PURPA requests.

[10] *See also* Staff Comments at 11-12.

lowered for wind resources, Avista respectfully requests that, at a minimum, the eligibility cap be lowered for wind and solar resources.

### A. The Eligibility Cap for Published Avoided Cost Rates Should be Lowered Indefinitely.

Avista supports Staff's alternative solution to the Utilities' recommendation of lowering the eligibility cap indefinitely. This approach is preferable to the other alternatives because it will allow truly small QFs to take advantage of published avoided cost rates while at the same time ensuring that the rates paid to larger QFs more accurately reflect the utility's actual avoided costs.

Staff suggests that the IRP Methodology used to determine the avoided cost rate for developers above the eligibility cap requires the use of complicated and proprietary production cost models and that developers might be suspicious of the model results and would be unable to replicate or verify the model output.[11] Avista is sensitive to these concerns. Avista does not, however, agree that the use of the IRP Methodology for projects greater than 100 kW will be excessively burdensome or complex. The IRP Methodology is presently well founded and developed in a public process. The method comes from a biennial process that has been, in the case of Avista, in use since 1989. Avista also encourages Commission Staff to participate in its

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[11] Avista notes that the Northwest and Intermountain Power Producers Coalition ("NIPPC") argues that lowering the eligibility cap would frustrate the purpose of PURPA. In support of its argument, NIPPC cites a U.S. Supreme Court case, *FERC v. Mississippi*, 456 U.S. 742 (1982), that NIPPC reads to state that "one of the fundamental reasons for the mandatory purchase requirement is that the Utilities have been found to be reluctant to purchase electricity from 'nontraditional facilities.'" NIPPC Comments at 7. The reduction of the eligibility cap will not change the mandatory purchase requirement under PURPA; lowering the eligibility cap only bears on the question of the size limit for QFs that are able to avail themselves to published avoided cost rates it does not have any relevancy to the issue of whether a utility has an obligation under PURPA to purchase the output from a QF. Therefore, NIPPC's argument that reducing the eligibility cap will frustrate PURPA is without merit. Moreover, FERC's regulations expressly require standard published rates only for Qualifying Facilities with a design capacity of 100 kW or less. 18 C.F.R. § 292.304(c)(1).

process to the extent that Staff and/or developers think that such participation may be helpful in assuring developers that Avista is fairly implementing its IRP Methodology.[12]

Commission Staff recommends that the Commission lower the eligibility cap only for wind resources.[13] As stated above, Avista respectfully requests that, at a minimum, the Commission consider lowering the eligibility cap for wind and solar resources. As explained further in Appendix B to these comments, there is significant day-to-day variability associated with solar resources. There is also substantial variability for solar resources across the on-peak hours. Solar provides a limited capacity contribution in the peak winter months, and a less than 15% nameplate contribution in the summer months. Finally, as Staff notes, developers of solar resources may have the ability to configure their projects to circumvent the intent of the published avoided cost rate eligibility cap.[14]

Avista encourages the Commission to adopt the alternative of limiting the eligibility cap for published avoided cost rates to 100 kW for, at a minimum, all wind and solar QFs on an indefinite basis. This alternative provides the best solution to the disaggregation issue. To the extent that the Commission does not apply the 100 kW eligibility cap to resources other than wind, Avista requests that the Commission make clear that it will revisit that issue in the future in the event that it is shown that developers of such other resources are disaggregating projects to avail themselves to published avoided cost rates.

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[12] Avista does not anticipate that the Commission Staff will need to dedicate substantial time or resources to this process. Rather, Avista believes that Staff participation in the first one or two contracts for which the IRP process is used after the eligibility cap is lowered may help developers to feel comfortable with that process.
[13] Staff Comments at 12.
[14] Staff Comments at 6.

### B. Avista Supports Staff's Alternative to Reintroduce an Avoided Cost Computation Methodology that Takes the Utility's Need for New Generation into Account.

Avista supports the concept of reintroducing utility need into the QF pricing equation. Prior to 2002, the Commission acknowledged that, when a utility is surplus, new QF generation will only serve to further its surplus, and that the surplus has only the value inherent in the wholesale marketplace.[15] The fully-embedded cost of generation reflected in today's published avoided cost rates are too high—especially if the utility is in a surplus period. As Staff recognizes, it could be successfully argued that power offered for sale to a utility during its surplus period has no value.[16]

To ensure that the load and resource positions are clear when each PURPA contract is negotiated, Avista proposes that the load and resource position published in its latest integrated resource plan ("IRP") be used. Avista proposes to keep the load and resource position constant for the two-year period that an IRP is current. Avista believes that it is especially important for utility need be reintroduced into the QF pricing equation, if the Commission does not lower the eligibility cap indefinitely.

### C. Avista Does Not Support Implementing a Larger Separation Rule.

Avista does not support Staff's alternative of implementing a larger separation rule to address the disaggregation issue.[17] Staff explains that a separation requirement that is greater than one-mile might conflict with federal law.[18] Although, as explained below, Avista believes that the Commission can require separation greater than one-mile as a condition to eligibility to

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[15] *See* Staff Comments at 8-9.
[16] Staff Comments at 9.
[17] Staff Comments at 9-10.
[18] Staff Comments at 10.

published avoided cost rates for QFs greater than 100 kW, Avista is concerned that such a separation rule will be difficult to implement and enforce.

First, it is Avista's view that a five-mile (or other separation requirement exceeding the one-mile FERC limit) separation rule applied to QFs greater than 100 kW would not conflict with federal law. FERC's one-mile separation requirement requires that QFs be separated by at least one mile.[19] The FERC separation requirement does not speak to the criteria that the Commission may adopt for eligibility for published avoided cost rates for QFs that are greater than 100 kW.[20] In that regard, FERC's only requirement for standard published rates is that they be available to QFs that are 100 kW or less.[21] States can, however, authorize published avoided cost rates for QFs larger than 100 kW.[22] Under such circumstances, the FERC regulation does not prohibit states from adopting additional eligibility requirements—such as separation requirements greater than one-mile.[23] Therefore, the Commission could mandate for purposes of published avoided cost rate eligibility a separation of, for example, five miles or more for QFs larger than 100 kW. So long as projects of 100 kW or less remain eligible for published avoided cost rates without regard to the increased separation requirement, such a rule would not conflict with federal law.

Although it is legally possible to increase the separation requirement for those QFs greater than 100 kW that want to avail themselves to published avoided cost rates, Avista does not prefer this approach. Avista is concerned that developers may find simple ways to circumvent any such increased separation requirement by creating the appearance of different

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[19] 18 C.F.R. § 292.204(a).
[20] *Compare* 18 C.F.R. § 292.304(c) *with* 18 C.F.R. § 292.204(a).
[21] 18 C.F.R. § 292.304(c)(1).
[22] 18 C.F.R. § 292.304(c)(2).
[23] *See* 18 C.F.R. § 292.304(c)(2).

ownership or control between projects. For example, where there is a large project it could be split up into multiple projects with one or more landowners owning the first project, another owning the second project, etcetera. A developer could also develop one large project, split that project into multiple projects, and hand "ownership" of the pieces of the broken-up project to the landowners or other business entities. The developer could then charge large development fees to transfer most of the value of the entire development to the developer without retaining "ownership." In either of these examples the separation rule could be rendered effectively moot.

For the reasons discussed above, Avista does not generally support an increased separation rule. However, if the Commission determines that the eligibility cap for published avoided cost rates should be greater than the 100 kW cap requested by the Utilities, Avista requests that the Commission consider a separation rule of five miles or more *in conjunction with* any eligibility cap greater than 100 kW.

### D. Avista Does Not Prefer, But Would Support, A New Methodology for Large QF Project Rates.

Avista would support an effort to develop a new methodology for large QF project rates. However, Avista does not prefer this alternative.

Staff references the recent "Wind SAR" proceeding as an alternative to establish avoided cost rates for QF.[24] In that proceeding, the effort was abandoned in favor of this proceeding before an alternative Surrogate Avoided Cost Resource (SAR) methodology was reached. Experience indicates that any attempt to develop a resource-specific or other new SAR methodology will be difficult and will require substantial investment of time and resources by all parties. Even if a new SAR methodology can be developed, it is not clear that any such methodology will solve the disaggregation issue. For these reasons, Avista is not convinced that

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[24] Staff Comments at 11.

pursuing a new methodology, such as multiple SARs, is the best solution to the disaggregation problem. However, to the extent that the Commission does not lower the eligibility cap indefinitely such that large developers cannot continue to disaggregate to avail themselves to published avoided cost rates, Avista believes resource-specific SARs might be the only other workable solution.

## III. Conclusion

Avista appreciates the opportunity to submit these reply comments on the issue of PURPA published rate eligibility. Avista supports Commission Staff's recommendation to reduce the eligibility cap for published avoided cost rates to 100 kW, effective December 14, 2010, while the Commission conducts its investigation. Avista also supports Staff's first alternative long-term solution—to reduce the eligibility cap to 100 kW indefinitely—as the simplest and best approach to solve the disaggregation issue. Avista respectfully requests that the Commission reduce the published avoided cost rate eligibility cap to 100 kW. Although Staff recommends lowering the eligibility cap only for wind QFs, Avista requests that, at a minimum, the Commission lower the cap for both wind and solar QFs.

DATED this 18th day of January 2011.

Michael G. Andrea
Attorney for Avista Corporation

# APPENDIX A

# PUPRA History and 2009 - 2010 PURPA Activity
12/13/2010

**Existing PURPA Projects**

| Existing Projects | Start Date | Technology | Capacity | Location | Ownership |
|---|---|---|---|---|---|
| Project 1 | 8/1/1966 | Hydro | 17.7 MW | Spokane, WA | City of Spokane |
| Project 2 | 2/12/1982 | Hydro | 0.22 MW | Clark Fork, ID | James White |
| Project 3 | 6/1/1982 | Hydro | 0.02 MW | Northpoint, WA | Glenn Phillips |
| Project 4 | 5/1/1986 | Hydro | 1.4 MW | Northpoint, WA | Glenn Phillips |
| Project 5 | 9/1/1987 | Hydro | 0.9 MW | Lucille, ID | David Cereghino |
| Project 6 | 4/1/1988 | Hydro | 1.41 MW | Weippe, ID | Ford Hydro Limited |
| Project 7 | 2/12/1999 | Hydro | 1.3 MW | Kettle Falls, WA | Hydro Tech Systems |
| Project 8 | 7/22/2003 | Thermal - Wood | 62 MW | Lewiston, ID | Clearwater Paper Company |
| Project 9 | 10/1/2006 | Thermal - Wood | 6 MW | Plummer, ID | Stimson Lumber |
| | | SUM | 91 MW | | |

**PURPA Inquiries**

1) Projects that have made inquiries and we've sent them the materials.
No further negotiations have taken place

| Project | Date | Last Communication | Technology | Capacity | Location |
|---|---|---|---|---|---|
| Project 1 | Nov-09 | Mar-10 | Wind | 20 MW | SW Montana |
| Project 2 | Mar-10 | Apr-10 | Landfill Gas | 1 MW | Coeur d'Alene, ID |
| Project 3 | Mar-10 | Mar-10 | Biomass | 10 MW | SW Oregon |
| Project 4 | Apr-10 | Apr-10 | Wind | 10 MW | Reardan, WA |
| Project 5 | Jun-10 | Dec-10 | Hydro | 0.4 MW | Northpoint, WA |
| Project 6 | Jul-10 | Jul-10 | Wind | 80 MW | SW Washington |
| Project 7 | Aug-10 | Aug-10 | Biomass | 9 MW | SW Oregon |
| Project 8 | Dec-10 | Dec-10 | Biomass | 80 MW | E. WA |
| Project 9 | Dec-10 | Dec-10 | Wind & Solar | 70 MW | Washington |
| | | | Sum | 280 MW | |

2) Projects that have made development progress and contractual progress
All of these projects proposed to deliver to Avista in Idaho

| Project | Date | Last Communication | Technology | Capacity | Location |
|---|---|---|---|---|---|
| Project 1 | Jan-08 | Nov-09 | Wind | 20 MW | Norris, MT |
| Project 2 | Jan-10 | Sep-10 | Bio-gas | 7 MW | Blanchard, ID |
| Project 3 | Jun-10 | Jun-10 | Wind | 20 MW | Grangeville, ID |
| Project 4 | Jun-10 | Jun-10 | Wind | 20 MW | Grangeville, ID |
| Project 5 | Jun-10 | Jun-10 | Wind | 20 MW | Grangeville, ID |
| Project 6 | Jun-10 | Jun-10 | Wind | 20 MW | Grangeville, ID |
| Project 7 | Jun-10 | Jun-10 | Wind | 20 MW | Grangeville, ID |
| Project 8 | Jun-10 | Nov-10 | Wind | 30 MW | Columbus, MT |
| Project 9 | Oct-10 | Dec-10 | Wind | 10 MW | Oregon |
| Project 10 | Nov-10 | Dec-10 | Wind | 10 MW | Oregon |
| | | | Sum | 177 MW | |

| | 1966-90 | 1991 | 1992 | 1993 | 1994 | 1995 | 1996 | 1997 | 1998 | 1999 | 2000 | 2001 | 2002 | 2003 | 2004 | 2005 | 2006 | 2007 | 2008 | 2009 | 2010 | 2011 |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| PURPA Non-Wind Projects | | | | | | | | | | | | | | | | | | | | | | |
| Annual MW (Capability) | 21.7 | | 62.0 | | | | | | | 1.3 | | | (62.0) | 62.0 | | | 6.0 | | | | | |
| Cummulative MW | 21.7 | 21.7 | 83.7 | 83.7 | 83.7 | 83.7 | 83.7 | 83.7 | 83.7 | 85.0 | 85.0 | 85.0 | 23.0 | 85.0 | 85.0 | 85.0 | 91.0 | 91.0 | 91.0 | 91.0 | 91.0 | 91.0 |
| PURPA Wind Proposed | | | | | | | | | | | | | | | | | | | | | | |
| Annual MW (Capability) | | | | | | | | | | | | | | | | | | | 20 | 20 | 310 | |
| Cummulative MW | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 20 | 40 | 350 | 350 |
| PURPA Non-Wind Proposed | | | | | | | | | | | | | | | | | | | | | | |
| Annual MW (Capability) | | | | | | | | | | | | | | | | | | | 0 | 0 | 168.4 | |
| Cummulative MW | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 168.4 | 168.4 |
| Stateline Wind Project | | | | | | | | | | | | | | | 35 | 35 | 35 | 35 | 35 | 35 | 35 | 35 |

# APPENDIX B

## Appendix B
## Analysis of Solar Contributions to Utility Needs

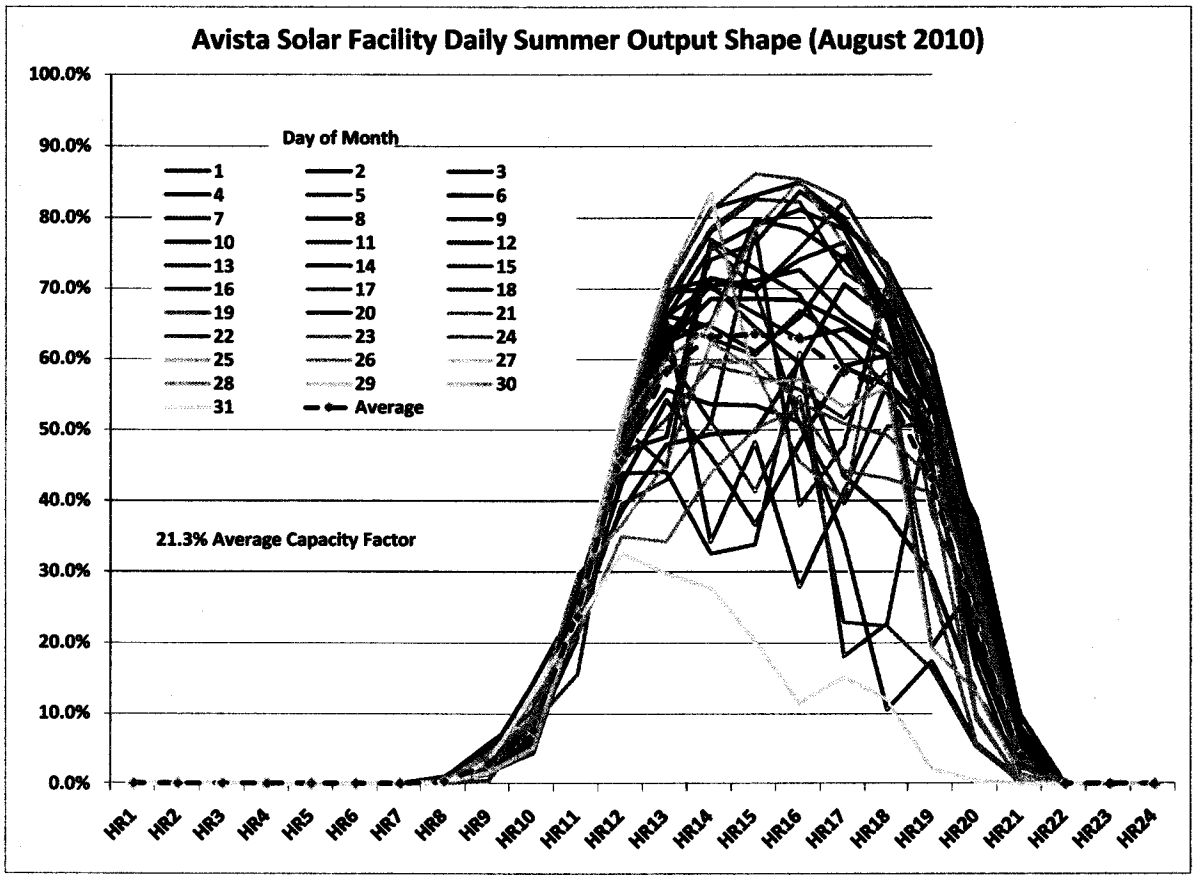
Introduction

Many advocates of solar point to its on-peak generation profile and conclude that this bias warrants a higher price than wind and lessens the reliability impacts of the resource. There is evidence that, unlike wind, solar does on average provide generation during periods where utility loads are higher than for wind. However, this fact does not eliminate the operational and valuation concerns associated with solar. Absent some storage medium, which is unlikely for QF projects which will be comprised of photovoltaic panels, solar does not greatly reduce the capacity needs of the utility. Yet solar appears to have many of the operational problems associated with wind resources; it is an unpredictable variable resource. Much of this unpredictability comes from various weather variables that affect output, including cloud-cover, precipitation, temperature and dust. Avista presents the following analyses in support of its view that eligibility for published avoided cost rates for solar, like wind, QFs should be limited to 100 kW.

Solar Experiences Significant Day-to-Day Variability

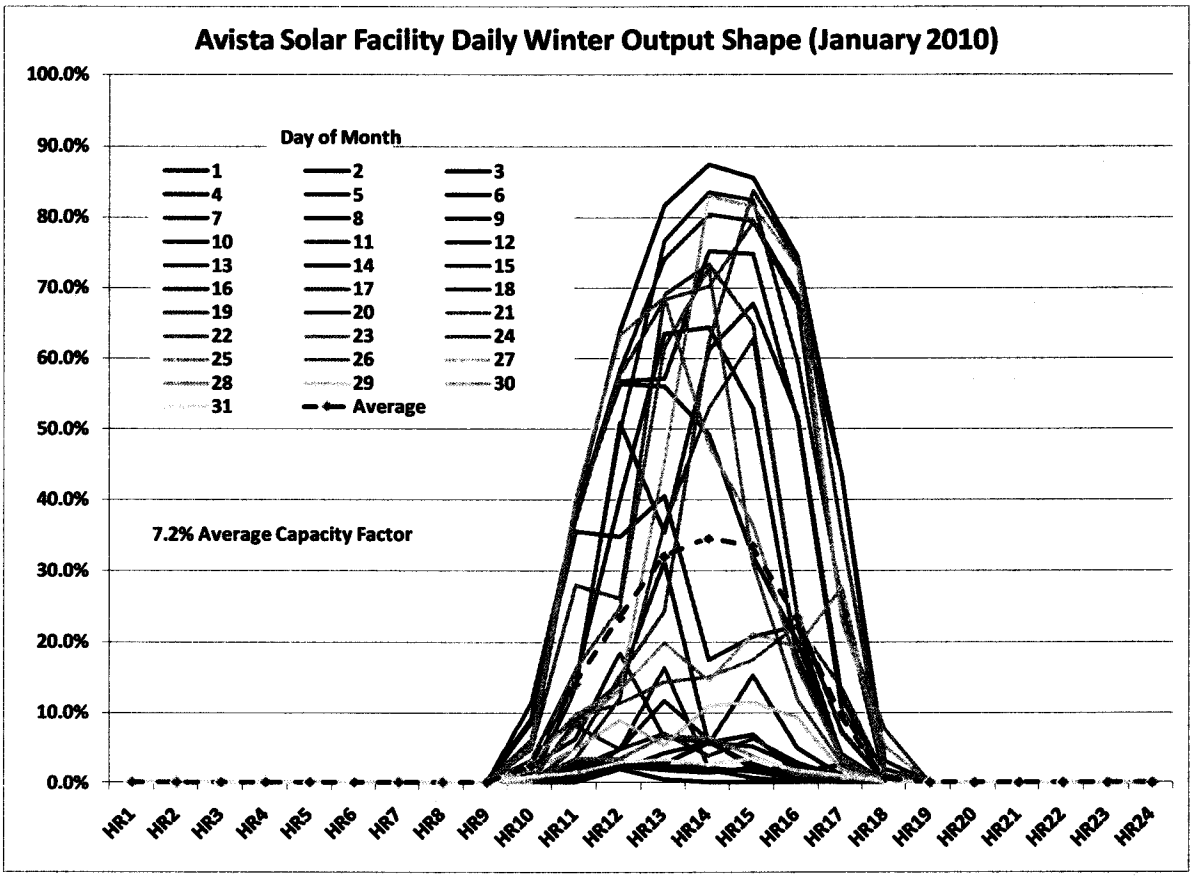
Avista in 2009 installed 3.5 kW-DC photovoltaic solar facility on the top of its corporate headquarters. Chart 1 below details the hourly summer profile of Avista's solar facility in 2010. Chart 2 illustrates the same for a winter profile, defined as January 2010. As can be seen in both cases, the variability across the on-peak hours is substantial. In the case of winter, the average capacity factor is 7.2% for solar, yet variability during on-peak hours is between zero and 87%. In the winter, output for solar can be zero even during solar's peak output hours (12:00p-4:00p).

**Chart 1**




In the summer the average solar capacity factor of Avista's facility was 21.3%, with a range in the on-peak hours of between zero and 86%. During the summer when average production is the highest, output during the resource's highest production hours (1:00p-5:00p) ranged greatly, between 11.6% and 87.4% in 2010, versus an average of 61.9%.

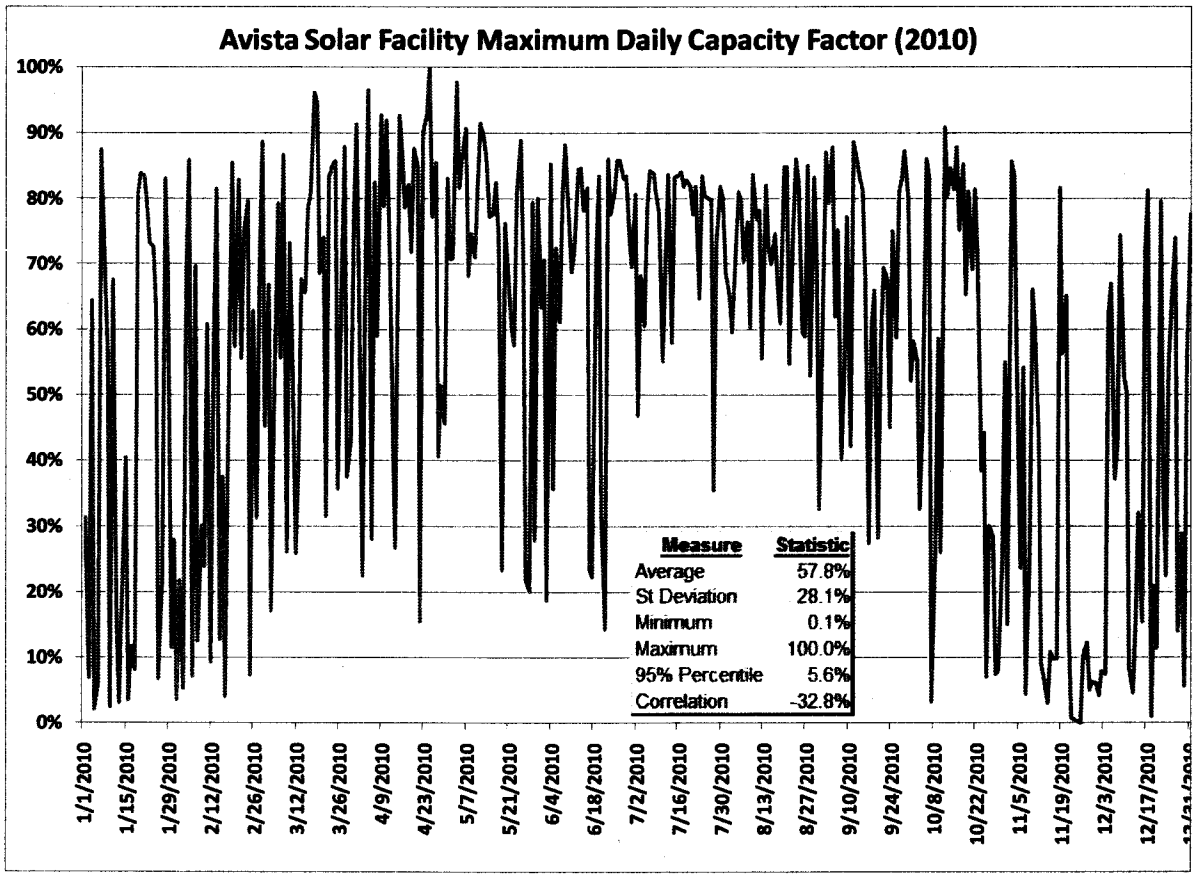
**Chart 2**




<u>Solar is Not Correlated to System Needs (Peak Demand)</u>

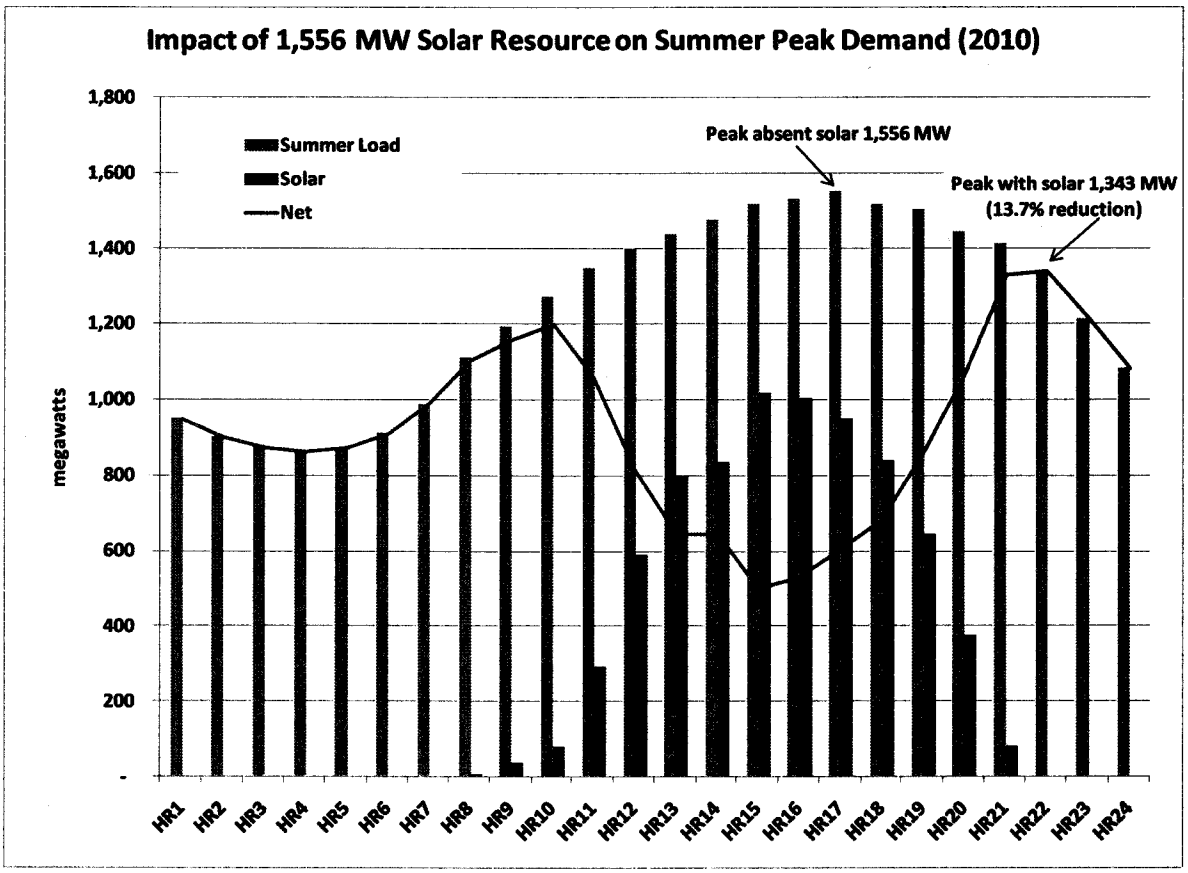
Solar output is not consistent or "reliable." As a result, Avista's other resources will have to stand ready to backup the solar resource. In 2010 the correlation of Avista's solar facility to Avista's daily peak demand was -33%, indicating no correlation. Chart 3 below provides the peak daily output profile of Avista's solar test facility during 2010.

**Chart 3**




Although Chart 3 provides a good illustration of the variability of solar, it does not explain the capacity contribution of the resource. Solar, while generating on-peak energy, does not greatly reduce a utility's need to construct capacity resources. To illustrate this, Avista analyzed its peak winter and summer load days during 2010. In each case it was assumed that a solar facility of the same size as the peak demand hour was constructed (otherwise the impact would be difficult to visualize). As Chart 4 shows, during the summer months the solar facility would reduce the peak need of the utility by only 13.7% of the nameplate of alternating current rating of the resource.

**Chart 4**




The facility generated a significant amount of electrical energy on this hot day, but its output fell substantially before Avista's load fell. Therefore Avista's peak need for non-solar resources was simply *shifted* from hour ending 17 (4:00p-5:00pm) to hour ending 22 (9:00p-10:00p). A 13.7% reduction was achieved. A similar analysis was completed by the Northwest Power and Conservation Council's (NPCC) 6th Power Plan using the expected solar output of southern Idaho. NPPC's analysis revealed an even smaller peak reduction of 9%.

The same analysis performed for the winter, using both Avista's and the NPCC's solar profiles, found that *during the winter solar will provide no peak capacity reduction.*

CERTIFICATE OF SERVICE

I hereby certify that on this 18th day of January 2011, true and correct copies of the foregoing Reply Comments of Avista Corporation were delivered to the following persons via Email.

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