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UTILITIES COMMISSION

Avista Corp.  
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AVU-0-11-02

March 23, 2011

Jean Jewell, Commission Secretary  
Idaho Public Utilities Commission  
P O Box 83720  
472 W Washington 83702  
Boise, ID 83720-0074

RE: Avista's Petition for an Order Modifying IRP Filing Date

Dear Ms. Jewell:

Attached for filing is an original and 7 copies of "Avista's Petition for an Order Modifying IRP Filing Date." Pursuant to Order No. 25342, Case No. GNR-G-93-2 (Reference PURPA Section 303(b)(3), Avista Corporation petitions the Idaho Public Utilities Commission for an order modifying the date for the filing of the Company's Natural Gas Integrated Resource Plan ("IRP"). The Company requests that the action date of this request be June 1, 2011. A copy has also been filed with the Commission's filing center electronically.

If you have any questions regarding this request, please feel free to contact Greg Rahn at 509-495-2048 or myself.

Sincerely,

Shawn Bonfield  
Regulatory Policy Analyst  
Avista Utilities  
509-495-2782  
[shawn.bonfield@avistacorp.com](mailto:shawn.bonfield@avistacorp.com)

David J. Meyer  
Vice President and Chief Counsel  
Regulatory & Governmental Affairs  
Avista Corporation  
1411 East Mission Avenue, MSC 13  
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**BEFORE THE  
IDAHO PUBLIC UTILITIES COMMISSION**

In the Matter of the Petition of )  
AVISTA Corporation, dba Avista Utilities, )  
For an Order Modifying IRP Filing Date )  
Prescribed in Order 25342 )

DOCKET NO. AVU-5-11-02

PETITION OF AVISTA CORPORATION  
FOR AN ORDER MODIFYING IRP  
FILING DATE

1. As prescribed in Order No. 25342, Case No. GNR-G-93-2 (reference PURPA Section 303(b)(3), Energy Policy Act of 1992,) Avista Corporation (“Avista,” or “Company”) herewith petitions the Idaho Public Utilities Commission (“Commission”) for an order modifying the date for the filing of the Company’s Natural Gas Integrated Resource Plan (“IRP”). Please direct all correspondence related to this Petition to the following:

David J. Meyer, Esq.  
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2. The Company is required by Order No. 25342, Case No. GNR-G-93-2, to file its natural gas Integrated Resource Plan within two years after the date on which the previous plan was issued – i.e., in Avista’s case, by December 31 of each odd-numbered year.

3. The Company has identified three areas of significant workflow that currently overlap and occur in the fall of each year: PGA filings, Avista’s procurement planning, and IRP drafting/review/finalizing. Two of the three activities occur in advance of the start of each natural gas year in November – namely, PGA filings and procurement planning. The third activity (the IRP) in theory does not have to be performed at the same time as the PGA filings and the Company’s procurement planning – both of which place considerable demands on Avista and its stakeholders for review. Accordingly, Avista, is recommending a permanent shift of that calendar of key IRP dates away from the fall, and understands that this proposal enjoys the support of Staff and other stakeholders who participate in the IRP process. Provided as Attachment A is a proposed IRP “Activity Timeline,” shifting the filing of Avista’s next natural gas IRP from December 31, 2011 to August 31, 2012.

4. It should also be noted that, in accordance with Case No.U-1500-165, Order No. 22299, Case No.GNR-E-93-1, Order No. 24729 and Case No.GNR-E-93-3, Order No. 25260, the Company files its Electric IRP on August 31<sup>st</sup> of each odd-numbered year. A shift in the required filing date for the natural gas IRP would provide a staggered filing for the Company’s two IRP’s, and avoid an overlap in participation in the two separate plans by the stakeholder groups.

5. Avista has discussed the shift in the natural gas IRP filing dates with Staffs in Idaho, Washington and Oregon, all of whom support the proposal and have agreed that this

would allow for a more thorough and efficient review of the natural gas IRP, given conflicting priorities. On December 30, 2010, the Washington Utilities and Transportation Commission approved the Company's application for the shift in filing dates in Docket No. UG-101982, and a similar filing is pending in Oregon in Docket UM 1521. Ultimately, the quality and thoroughness of the review process will be enhanced. Moreover, the Company, for its part, agrees to provide a natural gas demand update to the Commission between the time this request is approved and when the Company would otherwise make its next natural gas IRP filing in August 2012, in order to allay any concerns about a delay in the filing of the 2012 IRP.

6. For these reasons, the Company respectfully requests that the Commission modify the filing deadline for the Company's natural gas IRP to August 31<sup>st</sup> of each even-numbered year, commencing with the filing of the 2012 IRP by August 31, 2012.

DATED this 23<sup>rd</sup> day of March, 2011

By:   
David Meyer  
Vice President and Chief Counsel, Avista Corp.



### Avista Natural Gas IRP Activity Timeline

|  | Existing Calendar/Schedule |      | Proposed Calendar/Schedule |      |
|--|----------------------------|------|----------------------------|------|
| Work Plan Filed in Washington                  | <b>December 31, 2010</b>   | Days | <b>August 31, 2011</b>     | Days |
| Plan Kickoff (Staff check in / discuss plan)   | March 6, 2011              | 65   | <b>November 20, 2011</b>   | 81   |
| TAC #1 Demand Forecast & DSM Methodology       | April 5, 2011              | 30   | December 20, 2011          | 30   |
| TAC #2 Supply Infrastructure & Dist. Planning  | May 5, 2011                | 30   | January 19, 2012           | 30   |
| TAC #3 Prelim SENDOUT Results & Proposed Cases | June 4, 2011               | 30   | February 18, 2012          | 30   |
| TAC #4 Final SENDOUT Results and Findings      | July 19, 2011              | 45   | April 3, 2012              | 45   |
| Draft Distributed                              | <b>September 2, 2011</b>   | 45   | May 18, 2012               | 45   |
| Draft Comments Due                             | <b>November 1, 2011</b>    | 60   | July 17, 2012              | 60   |
| Filing Date                                    | <b>December 31, 2011</b>   | 60   | <b>August 31, 2012</b>     | 45   |

**Red - PGA & Procurement Planning**

**Key IRP activities**