

ORIGINAL

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SECRETARY OF THE
COMMISSION

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FEDERAL ENERGY
REGULATORY COMMISSION

November 4, 2011

Honorable Kimberly D. Bose, Secretary
Federal Energy Regulatory Commission
888 First Street N.E.
Washington, DC 20426

RE: Public Utility District No. 1 of Douglas County, Washington Wells Project No. 2149-152

Dear Secretary:

Avista Corporation ("AVA"), a utility based in Spokane, Washington, purchases power under long-term contracts from Public Utility District No. 1 of Douglas County, Washington ("Douglas PUD") licensee of the Wells Hydroelectric Project No. 2149, Public Utility District No. 1 of Chelan County, Washington ("Chelan PUD"), licensee of the Rocky Reach Hydroelectric Project No. 2145, and from Public Utility District No. 2 of Grant County, Washington ("GPUD"), licensee of the Priest Rapids Hydroelectric Project No. 2114.

AVA submits this letter to support Douglas PUD's request that the Federal Energy Regulatory Commission ("the Commission") provide a 50-year license term for the new license for the Wells Project No. 2149, filed May 27, 2010 in its Final License Application and mirror Puget Sound Energy, Inc's ("PSE") letter to the Secretary dated October 18, 2011 recommending the renewal of a 50-year license term.

AVA also agrees with the premise in PSE's letter that the term of the new license for the Wells Project should be determined on the basis of the record developed in each specific relicensing proceeding. AVA agrees with PSE's concern regarding the Commission's Orders issuing renewals of licenses for Grant PUD's Priest Rapids Project No. 2114 and Chelan PUD's Rocky Reach Project No. 2145 with terms other than 50-years to facilitate coordination of future relicensing proceedings for these Projects. AVA also agrees with PSE that the selection of terms expiring in the same years for the Priest Rapids and Rocky Reach Projects raises concerns that the term of the new license for the Wells Project may have been pre-determined in other Project proceedings involving different parties with unique stakeholders' interests.

In summary, AVA agrees with PSE's recommendation and Douglas PUD's request that a term of 50 years should be granted for the renewal of the Wells Project No. 2149 in accordance with the record developed in the renewal application for the Wells Project.

Very truly yours,

Richard L. Storro
Vice President, Energy Resources - Avista Corporation

Cc: William C. Dobbins – Douglas PUD
Paul M. Wiegand - PSE

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