

Avista Utilities

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November 23, 2005

Ms. Julia A. Souder
Western Regional Coordinator
Department of Energy
1000 Independence Ave SW 8H-033
Washington, DC 20585

Dear Ms. Souder:

Re: 2005 Energy Policy Act-Programmatic Environmental Impact Statement

On behalf of Avista Corporation (Avista), I am pleased to provide you with Avista's comments and recommendations on the above matter. Oral comments on behalf of Avista were provided by me at the November 2, 2005 Public Scoping Meeting in Las Vegas, Nevada.

Avista is an electric and natural gas energy company, operating in the states of Idaho, Montana, Oregon and Washington. It provides service to 330,000 electric and 285,000 natural gas customers in three of these western states. It is one of the major generators and transmitters of electricity in the Northwest, as 2,160 miles of electric transmission lines are operated and Avista generates 1,663.1 MW of electricity. In addition, Avista wheels electricity across its transmission system for other utilities. Avista's stock is traded under the ticker symbol "AVA." For more information about Avista, please visit www.avistacorp.com.

The 2005 Energy Policy Act is one of the most important legislation, affecting utilities and federal agencies to meet the energy infrastructure needs of the country. The Department of Energy (DOE) is well positioned to be a major facilitator of the Act and Avista looks forward to working with DOE.

The Western Utility Group (WUG) has been a major cooperator with Federal Agencies in identifying utility corridors in the eleven (11) western states and in resolving industry/agency issues. Avista has been a longstanding member of WUG and has participated in WUG's efforts to identify utility corridors across the western United States. Therefore, it is critical that the corridor mapping efforts of WUG are included in the Programmatic Environmental Impact Statement (PEIS).

The following are Avista's recommendations:

The DOE should include all existing corridors of major utilities, which have been identified by WUG, including Avista corridors, as shown on the attached map. The member companies of WUG expended a great deal of effort and resources to prepare the maps for the use of the federal agencies. Therefore, the PEIS should include the maps. In addition, DOE should consult with each to identify all existing and potential corridors.

The DOE should develop a streamlined, uniform (exactly the same) permitting processes on all federal lands. The process should be a common process, which all federal agencies follow. One permit should be issued through DOE, to cross all federal lands involved in a corridor, rather than have each agency issue a separate permit.

All current or existing corridors should be used for multiple utility corridors, where possible. Proper spacing requirements should be developed through the industry input, to maximize the use of the corridors and minimize the impact on the environment. The following are suggested standardized corridor widths:

Electric Transmission	200 feet
Gas pipeline	60 feet permanent (120 feet temporary construction area)

Numerous railroad corridors cross federal and private lands. These corridors often are not being fully used and should be open to utility use. By having new utility corridors follow or be in railroad right-of-ways, will be very beneficial to the resource, as environmental impacts will be

minimized. This issue should be given the same close scrutiny by DOE, as the Tribal right-of-way issue, as set forth in the 2005 Energy Policy Act.

Power to load goals for utilities must be met; therefore the new process should be flexible to allow for new corridors, as all future uses or needs cannot be identified at this time. More corridors to resource rich areas (source to market corridors) such as Canada, southeast Montana, etc. will be needed. In addition, corridors from new generation sources, such as wind power will need corridors to attach to the energy grid. Once again, it is very important that DOE consult with each of the utilities to identify corridors.

Future corridors of interest to Avista are identified as follows by beginning and ending points:

1. Lolo or Hatwai (Lewiston, Idaho area) to Boise or Mid Point (Boise, Idaho area).
2. Hot Springs/Thompson Falls/Burke (Western Montana/North Idaho area) to Colstrip (Southeast Montana area)
3. Spokane, Washington to Boundary, B.C. Avista holds a Presidential permit for the construction of a new line, known as the BC Hydro Transmission Line.

The Transmission Industry and DOE should identify National Interest Electric Transmission Corridors (NIETC), through a joint effort. The experience and expertise of industry will be very beneficial to DOE in establishing NIETC.

Securing new permits on Tribal right-of-ways for existing facilities has become quite problematic for some utilities, as tribes are demanding many times the market value of a right-of-way for the renewal of these permits. Section 1813 of the 2005 Energy Policy Act, provides for a study to address the matter and to provide recommendations for valuing rights-of-ways in a fair manner. It is hoped that DOE will address this matter to the satisfaction of all concerned, including the tribes, utilities and consumers. Fairness, security and reliable energy delivery are very important to all parties.

Avista greatly appreciates the opportunity to comment on the PEIS and to participate in the process.

Please feel free to call me if you have any questions. My telephone number is (509) 495-4063.

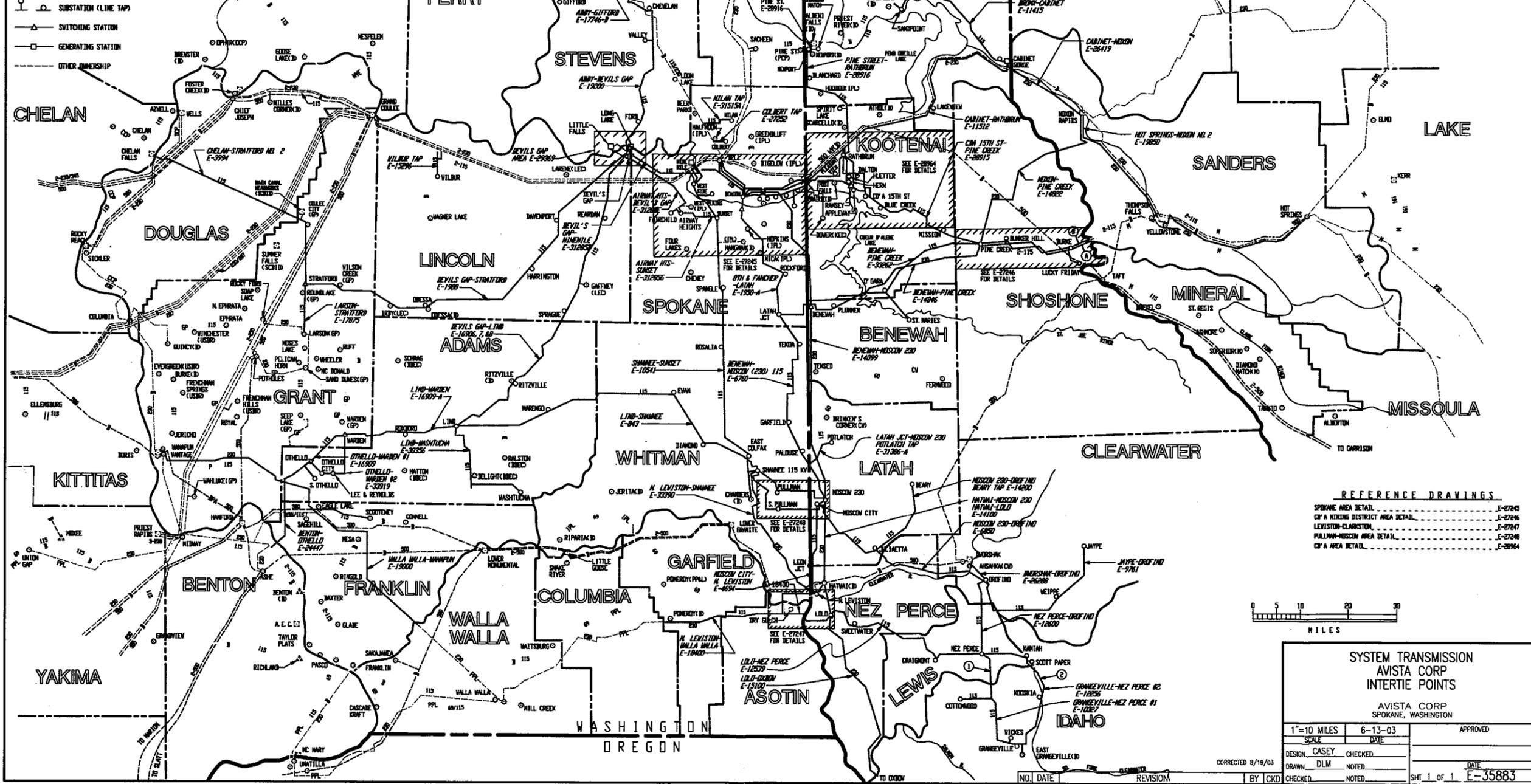
Sincerely,

A handwritten signature in black ink that reads "Donald J. Malisani". The signature is written in a cursive style with a prominent initial "D".

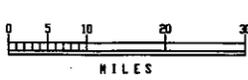
Donald J. Malisani, SR/WA
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E-35883

- LEGEND**
- B BONNEVILLE POWER ADMINISTRATION
 - BREC BIG RIVER ELECTRIC CO-OP
 - CCP CHELAN COUNTY PUB
 - CU CLEARWATER POWER CO
 - CP DOUGLAS COUNTY PUB
 - F FRANKLIN PUB
 - FP GRANT COUNTY PUB
 - JPL INLAND POWER & LIGHT
 - KEC KOOTENAI ELECTRIC CO-OP
 - LED LINCOLN ELECTRIC CO-OP
 - M MONTANA POWER CO
 - NVE NEZ PERCE VALLEY ELECTRIC
 - DCP DOKOCHWA COUNTY PUB
 - PPC PUYE SOUND POWER & LIGHT
 - POL PEND OREILLE PUB
 - PPL PACIFIC POWER & LIGHT
 - SCL SEATTLE CITY LIGHT
 - USBR U.S. BUREAU OF RECLAMATION
 - WPPS WASHINGTON PUBLIC POWER SUPPLY SYSTEM
- LEGEND**
- AWL 230 KV
 - AWL 115 KV
 - OTHER 500 KV
 - OTHER 230 KV
 - OTHER BELOW 230 KV
 - OTHER 115/230 KV
- SUBSTATION (LINE TAP)
 - △ SWITCHING STATION
 - GENERATING STATION
 - OTHER OWNERSHIP



- REFERENCE DRAWINGS**
- SPOKANE AREA DETAIL E-27265
 - OF A MIXING DISTRICT AREA DETAIL E-27266
 - LEVISTON-CLEARWATER E-27267
 - PULLMAN-NEZ PERCE AREA DETAIL E-27268
 - OF A AREA DETAIL E-27269



SYSTEM TRANSMISSION AVISTA CORP INTERTIE POINTS		
AVISTA CORP SPOKANE, WASHINGTON		
1"=10 MILES	6-13-03	APPROVED
SCALE	DATE	
DESIGN CASEY	CHECKED	
DRAWN DLM	NOTED	DATE
CHECKED	NOTED	SHT 1 OF 1
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