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IDAHO PUBLIC
UTILITIES COMMISSION

Attorney for the Idaho Conservation League

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

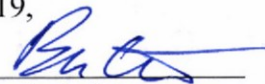
IN THE MATTER OF THE)	CASE NO. AVU-E-19-04
APPLICATION OF AVISTA)	
CORPORATION FOR THE)	
AUTHORITY TO INCREASE ITS)	IDAHO CONSERVATION LEAGUE
RATES AND CHARGES FOR)	
ELECTRIC CUSTOMERS IN THE)	STATEMENT OF POSITION
STATE OF IDAHO)	

The Idaho Conservation League, pursuant to Idaho Public Utilities Commission Rule of Procedure 31.01.01.255, hereby moves the Commission to accept the following Statement of Position supporting the settlement of Avista's General Rate Case. IDAPA Rule 255 allows parties, "in any proceeding" to file a motion with the Commission to accept a statement of position. This motion is timely pursuant to IDAPA Rule 256 which allows parties 14 days to respond prior to Commission action. The technical hearing at which the Commission would act on this motion is scheduled for November 22nd. ICL elects to follow this procedural pathway to avoid the expense of hiring a witness to file testimony as contemplated in IDAPA Rule 241. By utilizing the Statement of Position offered by Rule 255 ICL is avoiding costs for all parties while putting our organizational position in the formal record.

The Idaho Conservation League is a signatory to the proposed settlement and we believe the agreement is in the public interest. We engaged in this docket to address our concerns about spending ratepayer dollars on the struggling Colstrip coal plant and to secure additional support to help customers conserve energy. Through negotiation with the parties we achieved a great result for the public - reduced electric rates and increased conservation funding. Regarding ratepayer dollars for Colstrip, we acknowledge the settlement includes some revenue to address compliance with coal ash regulations. As coal plants like Colstrip reach the end of their

economically viable life, it is important to scrutinize proposed utility spending. ICL supports spending to comply with environmental laws and clean up the coal plant site. We oppose using ratepayer dollars to prolong the life of the plant, especially since the plant owners do not have a coal supply contract in place beyond December 31, 2019. This settlement agreement strikes the correct balance by allowing for revenue to cover coal ash clean up but keeping the risk of extraordinary Colstrip costs on Avista and other plant owners. We encourage the Commission to approve this settlement that cuts rates, protects customers from unnecessary spending on Colstrip, and invests in energy conservation.

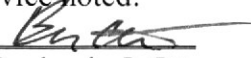
Respectfully submitted this 31st day of October 2019,



Benjamin J. Otto
Idaho Conservation League

CERTIFICATE OF SERVICE

I hereby certify that on this 31st day of October, 2019, I served the foregoing STATEMENT OF POSTION, in Case No. AVU-E-19-04 via the method of service noted:


Benjamin J. Otto

Hand delivery:

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Commission Secretary (Original and seven copies provided)
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