BEFORE THE

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UTILITIES COMMISSION

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IN THE MATTER OF THE APPLICATION OF AVISTA CORPORATION FOR THE AUTHORITY TO INCREASE ITS RATES AND CHARGES FOR ELECTRIC AND NATURAL GAS SERVICE TO ELECTRIC AND NATURAL GAS CUSTOMERS IN THE STATE OF IDAHO.	)	CASE NO. AVU-E-09-1/ AVU-G-09-1

DIRECT TESTIMONY OF RANDY LOBB

IDAHO PUBLIC UTILITIES COMMISSION

MAY 29, 2009

Q. Please state your name and business address for the record.

A. My name is Randy Lobb and my business address is 472 West Washington Street, Boise, Idaho.

Q. By whom are you employed?

A. I am employed by the Idaho Public Utilities Commission as Utilities Division Administrator.

Q. What is your educational and professional background?

A. I received a Bachelor of Science Degree in Agricultural Engineering from the University of Idaho in 1980 and worked for the Idaho Department of Water Resources from June of 1980 to November of 1987. I received my Idaho license as a registered professional Civil Engineer in 1985 and began work at the Idaho Public Utilities Commission in December of 1987. My duties at the Commission currently include case management and oversight of all technical Staff assigned to Commission filings. I have conducted analysis of utility rate applications, rate design, tariff analysis and customer petitions. I have testified in numerous proceedings before the Commission including cases dealing with rate structure, cost of service, power supply, line extensions, regulatory policy and facility acquisitions.

Q. What is the purpose of your testimony in this case?

A. The purpose of my testimony is to introduce Staff witnesses and the issues they address and describe Staff's approach in evaluating the Company's request. I will also discuss the various policy issues associated with this case including establishing a test year, incorporating the Lancaster Tolling Agreement and making changes to the sharing percentages in the Company's Power Cost Adjustment (PCA).

Q. How is your testimony arranged?

A. My testimony is arranged as follows:

I. Recommendation Summary

II. Introduction of Staff witnesses

III. Case Evaluation

IV. Lancaster

V. The PCA

Recommendation Summary

Q. Could you please summarize Staff's recommendation?

A. Yes. Staff recommends an Idaho electric base revenue requirement increase of $8.622 million or 3.91% and a natural gas base revenue requirement increase of $1.894 million or 2.06%. Staff recommends an overall rate of return of 8.55% and a return on equity of 10.5%.

Staff accepts the Company proposed historic test year of October 31, 2007 through November 1, 2008 but limits the proforma period for adjustments to 14 months through December 31, 2009.

The primary rate base and revenue adjustments proposed by Staff include a reduction in normalized power supply costs of approximately $40.6 million (on a total Company or system basis) from that proposed by the Company and a reduction in the requested return on equity from 11% to 10.5%. Other adjustments include elimination of rate base additions and non power expense adjustments after December 31, 2009 including the 2010 salary increase, cost amortization of Montana Riverbed Agreement and removal of costs associated with the Company's relicensing of its Spokane River hydro facilities.

Staff proposes a uniform revenue spread to all customer classes on the electric side with an across the board increase in all energy rate components. Staff further recommends that the Commission accept the Company's proposed customer class revenue spread on the gas side as adjusted for Staff's proposed revenue requirement and approve an across the board increase in customer rate components except the monthly customer charge. In an effort to mitigate the impact of higher base rates, Staff recommends that Purchase Gas Adjustment (PGA) and Power Cost Adjustment (PCA) rates be reduced to offset the base rate increases approved for gas and electric service in this case.

Finally, Staff recommends that the Commission approve the Company's request to include the cost of the Lancaster Tolling Agreement in the PCA as proposed. However, Staff recommends that the Commission deny the Company's request in this case to change the sharing percentage from 90%/10% to 95%/5% in the PCA mechanism.

Introduction of Staff Witnesses

Q. Could you please describe Staff's filing in this case?

A. Yes. Senior Staff Engineer Rick Sterling is responsible for review of profroma test year adjustments proposed by Company witness Johnson and review of the Company's Aurora power supply model used to calculate annual net power supply costs. As a result of his review, Mr. Sterling proposes two modifications to the modeled power supply costs addressed by Company witness Kalich. The first adjustment is a reduction in forecasted natural gas prices to reflect more current forward market prices. This adjustment reduces the Company's requested annual net power supply costs by $36.33 million on a system basis.

The second adjustment removes short-term fixed and financial hedge transactions made under the Company's risk management plan. The volume and price of these transactions are a function of below normal weather and market conditions and are not appropriate for normalized power supply costs included in base rates. This adjustment reduces Company requested annual net power supply costs by approximately $4.3 million on a system basis.

Senior Staff Auditor Joe Leckie develops Staff recommended test year electric rate base with proforma adjustments. Mr. Leckie accepts the Company's calculation of rate base using the 13-month average as adjusted for Staff's proposed proforma period. Staff recommends Company proposed plant additions through December 31, 2009, to arrive at a recommended Idaho jurisdictional rate base level of approximately $564.144 million.

Mr. Leckie also addresses the cost of the Coeur d'Alene Tribe Settlement, the Montana Riverbed Agreement and Spokane River Relicensing. Mr. Leckie recommends that the Commission accept the Company's proposed treatment of costs associated with the Tribal Settlement with adjustment limited to rate base averaging consistent with Staff's proposed test year. He then recommends an adjustment to remove the costs of Spokane River relicensing because no FERC license has yet been issued and costs are therefore not used and useful. He also recommends that the deferred costs associated with the Montana Riverbed Agreement be amortized over the 8-year agreement without carrying charges. This allows the Company to fully recover its investment but not earn a return on the deferred expenses.

Staff Auditor Donn English provides the Staff recommendation for rate base, expenses and revenue requirement for natural gas service in Idaho. He proposes several adjustments on a total Company basis that reduce revenue requirement for both gas and electric service. His adjustments include elimination of 2010 salary increases and acceptance of actual 2009 salary increases with various other adjustments in salary expense. He recommends an adjustment based on reduced regulatory fees, a reduction in Board of Director expenses and adjustments in a variety of other expense categories. Mr. English also addresses Employee Pension expense liability. Adjustments on the electric side are provided to Staff witness Vaughn for derivation of the electric revenue requirement. For Idaho natural gas service, Mr. English recommends a rate base of $90.03 million and an Idaho revenue requirement increase of 2.06% or $1.894 million.

Staff Auditor Cecily Vaughn begins with actual audited, total Company cost data for the historical 12-month test year base period of October 1, 2007 through September 30, 2008. She then applies the Company proposed jurisdictional allocation methodology and Staff proposed expense and rate base adjustments to develop an Idaho jurisdictional electric revenue requirement through December 31, 2009. The resulting annual base revenue requirement increase proposed by Staff is approximately $8.622 million for an overall increase of 3.91%.

Dr. Vaughn's revenue requirement proposal is based on the expense adjustments of Staff witnesses English, the rate base and expense adjustments of Staff witness Leckie, the power supply expense adjustment of senior Staff witness Sterling and the cost of capital recommendations of Staff Accounting witness Carlock.

Deputy Administrator and Audit Section Supervisor Terri Carlock addresses cost of capital and return on equity. Ms. Carlock recommends a return on equity of 10.50% and a capital structure of approximately 50% debt and 50% equity for an overall recommended rate of return of 8.55%.

Senior Staff Engineer Keith Hessing addresses the electric class cost of service (COS) methodology, class revenue spread and several Company proposed modifications to the power cost adjustment (PCA) mechanism including tracking transmission expense, modifying the retail revenue credit and inclusion of the production tax credit (PTC). Based on his review, Mr. Hessing recommends that the Commission accept the Peak Credit Cost of Service methodology proposed by the Company but spreads revenue uniformly in this case to all customer classes until current class COS load studies are completed. Using the Staff proposed jurisdictionally allocated Idaho revenue requirement, Mr. Hessing recommends a uniform base rate increase for all electric customer classes of 3.91%. Mr. Hessing recommends that the Commission approve the Company's proposed changes to the PCA to track variations in the Production Tax Credit and third party transmission costs/revenues included in base rates. Mr. Hessing further recommends that the Commission approve the Company's proposal to establish the retail revenue adjustment in the PCA using the Commission approved average cost of production and transmission subsequently established in this case. Finally, Mr. Hessing evaluates the expected level of PCA deferral balances over the next 18 months and recommends a PCA rate reduction of 0.361 cents per kWh that will offset the impact of the Staff's proposed base rate increase without unduly increasing the risk of higher PCA deferral balances in the future.

Staff Economist Matt Elam recommends that the Commission accept the Company's gas cost of service based revenue spread to the various customer classes. Using the Staff proposed revenue requirement, the increases range from a 2.0% increase for Schedule 131 to a 3.0% increase for Schedule 111. Schedule 101, which is mostly residential, will receive an increase of 2.9%. Mr. Elam further recommends that only the commodity charge be increased in each class to recover the proposed base revenue increase. Finally, Mr. Elam recommends that the PGA rate per therm be decreased by 0.02599 cents to offset impact of the base rate increase and reflect the lower forecasted cost of natural gas.

Staff Economist Bryan Lanspery recommends that the revenue assigned to the various electric customer classes as proposed by Staff witness Hessing be recovered solely from the energy component. In addition Mr. Lanspery utilizes the PCA rate reduction provided by Mr. Hessing to offset the base energy rate increase for a net change in rates ranging from an increase of 1.2% for General Service Schedule 11 to a decrease of 2.01% for Potlatch (now known as Clearwater Paper) Schedule 25. Residential customers will see a net change of 0.61% under Mr. Lanspery's recommendation.

Staff Economist Lynn Anderson addresses the prudency of demand side management (DSM) expenditures made by Avista from January 2008 through November 2008. Mr. Anderson recommends that the Commission defer consideration of the Company's DSM program expenditures until sufficient information is provided to evaluate prudency. Mr. Anderson points to a lack of post implementation program evaluation and plans of the Company to improve its evaluation programs as justification for deferring a finding of prudency in this case.

Finally, Consumer Investigators Marilyn Parker and Curtis Thaden address a broad range of consumer issues. Ms. Parker discusses the number and tenor of customer comments received by the commission in this case. She also addresses the monthly residential customer charge, and opposes any increase. She concludes by addressing reduced telephone service level standards, increasing customer complaints and the various improvements that the Company has made in service quality technology.

Mr. Thaden provides information on customer demographics, low income financial assistance programs, payment programs and low income energy efficiency programs.

Case Evaluation

Q. What has been your role in this case?

A. My role as Staff Administrator has been to oversee the preparation of the Staff case with respect to identification of issues, coordination of positions on those issues and development of Staff policy.

Q. What are the important policy issues in this case?

A. In my opinion, the most important policy issues include: establishing the rate case test year; identifying revenue requirement adjustments; assigning cost of service responsibility, and applying appropriate rate designs including mitigation using the PGA and PCA. Additionally, modification of PCA sharing percentages is an important policy issue in this case.

Q. Please describe Staff's approach in evaluating the Company's rate increase request.

A. Staff's approach in evaluating the Company's rate request in this case was consistent with methods used many times in general rate cases over the last few years. Staff audited the actual costs booked in the test year, evaluated the Company's proposed proforma adjustments to historic costs and identified costs that were believed to be inappropriate. Because Avista is an electric and natural gas company operating in several state jurisdictions, actual costs and proforma adjustments were evaluated on a total Company basis. Any cost adjustments in the Company's case identified by Staff were then allocated to gas and/or electric service on an Idaho jurisdictional basis.

Q. Did Staff focus on any specific issues in its review?

A. Yes. As in all cases, Staff focused on cost of capital and the level of test year operation and maintenance expense including employee compensation. Staff also focused on the big ticket expense changes and capital additions since the last rate case. Finally, Staff focused on the "known and measurable" and "used and useful" proforma adjustments to historic test year costs and the period beyond the historic test year that adjustments should be allowed.

Q. What proforma period does the Staff recommend be allowed to adjust actual test year results of operations?

A. The Company uses an actual historic test period of October 1, 2007 through September 30, 2008. Staff recommends that known and measureable proforma adjustments be allowed through December 31, 2009. Staff believes that the 15-month proforma period beyond the end of the 12-month test year assures that expenses and plant additions are both known and measurable and used and useful. The exception is in the calculation of net power supply costs because these costs are already normalized using a forecasting model. Staff does not oppose allowing a forecast of power supply costs through June 30, 2010 and inclusion of any production plant used in the calculation.

Q. How does this compare to the most recent Order issued by the Commission regarding historic test year and proforma period?

A. The most recent Commission decision on appropriate test year came in Order No. 30722 in Case No. IPC-E-08-10. In that Order the Commission approved modification of Idaho Power's historic 12-month test period with limited adjustment into the future for anticipated capital additions and expense changes. The proforma adjustment period was limited to 12 months beyond the end of the historic test period. The Commission did allow a forecast of normalized power supply costs beyond the 12 month proforma period. Staff believes its recommended test year and proforma period is consistent with the Commission's Order in the Idaho Power case.

Q. Is Staff's recommendation to reduce the Company's electric revenue increase request from $31.23 million to $8.622 million and gas revenue requirement increase from $2.74 million to $1.894 million in response to the weakened economy and the level of opposition expressed by the Company's customers?

A. Not necessarily. The impact of Company rate increases on customers is always a concern of the Commission Staff. In a weakened economy as described by Staff witness Thaden, I believe customers expect Staff to more aggressively evaluate the Company's request. However, Staff believes it is always thorough in its audit review, and this case is no exception. Staff believes its recommendation to use PGA and PCA rate reductions to mitigate base rate increases is a reasonable response to current economic conditions.

Staff also believes it has continued to recommend adjustments in those areas that are fair to the Company but pass through only those costs that are necessary at this time. For example, the lion share of the revenue requirement adjustments come from three areas: 1) limiting the test year proforma period; 2) granting a reasonable return on equity to shareholders, and 3) reducing the requested electric power supply costs to reflect more accurate prices available in the market place. The justification for adjustments in these areas is fully described in the testimony of the appropriate Staff witnesses.

Q. Shouldn't even greater reductions in revenue requirement have been proposed by Staff given the current economic conditions?

A. Staff does not believe it is fair or reasonable to the Company or its customers to propose a reduced revenue requirement beyond that recommended by Staff in this case. Based on its review of Company O&M expenditures and capital additions, Staff concludes that its recommended revenue requirement is appropriate and necessary to provide adequate service.

Staff believes that a further reduction in O&M expenses could reduce service quality and reliability beyond the point acceptable to most Avista customers.

Additionally, Staff believes that disallowing capital investment for plant replacement actually completed could impact Avista's earnings, financial ratings and ability to borrow money at reasonable interest rates. Finally, failure to allow the Company to include costs of replacing/protecting aging or existing infrastructure could reduce such investment in the future, again diminishing reliability and service quality. Staff does not believe it is appropriate at this time to sacrifice service quality to assure marginally lower rates.

Q. Company witness Andrews states in her testimony (page 9, lines 9-21) that costs associated with the Coeur d'Alene Tribal Settlement and Spokane River Relicensing were reviewed and approved for recovery in Case No. AVU-E-08-01. Do you agree?

A. No. In the last case, the agreement between the Coeur d'Alene Tribes and the Company had not been completed and its costs were not finally known and measurable. Staff agreed as part of the Settlement and the Commission approved to defer all costs with a carrying charge until the next rate case. Staff did not complete its review of these issues in Case No. AVU-E-08-01 because final costs were not known. The same is true for the Spokane River relicensing; these costs were not known and measurable because FERC had yet to approve the new license. Likewise, these costs could not and were not approved in that case for automatic recovery in this case.

Q. Were there indications in the last rate case that costs associated with these two issues were incomplete?

A. Yes. Company witness Norwood states, on page 8 of his testimony filed in Support of the Settlement in Case No. AVU-E-08-01, that a final license for Spokane River has yet to occur. On page 9 he states that confidential litigation (the Coeur d'Alene Tribe Settlement) is still pending and has yet to be finally resolved. Moreover, the Stipulation at page 5 states that issuance of the FERC license "has yet to occur." And on page 6, the parties acknowledge that settlement of the Coeur d'Alene Tribal litigation "is still pending and has yet to be finally resolved…"

Q. Is the Staff prohibited from making cost recovery adjustments on these issues in this case?

A. No, not in my opinion. Neither Staff nor the Commission in the last case evaluated the prudency of the Coeur d'Alene Tribal Agreement or the Spokane River Relicense. The Commission simply approved the Settlement deferring the costs for accounting purposes. The Settlement in no way authorized automatic, undisputed cost recovery in this case based on the proposal of the Company in Case No. AVU-E-08-01.

Q. Why does the Staff recommend a reduction in the PGA and PCA rates to mitigate proposed base rate increases?

A. Staff believes that the PGA rate reduction is justified because the current weighted average cost of gas (WACOG) embedded in rates is much higher than the forward cost of gas in the market place. Even with the reduction, the WACOG will likely decrease again this year as part of the Company's annual PGA filing.

Staff's proposed PCA rate reduction is reasonable but relies on future water conditions that are unknown and might impact future PCA deferral balances. Staff witness Hessing provides more information on future PCA deferral balances with the proposed PCA rate reduction in this case. Nevertheless, Staff believes that the risk of higher PCA rates in the future is justified to moderated rate increases for customers today.

Lancaster

Q. What is your understanding of the Lancaster Tolling Agreement?

A. The Lancaster power plant is a 275 Mw gas fired, Combined Cycle Combustion Turbine (CCCT) located in Rathdrum, Idaho. The Lancaster Tolling Agreement between Avista Utilities and Rathdrum Energy LLC came about as part of Avista Corporations sale to Coral Energy of Avista Energy (an Avista Utilities affiliate). Avista Energy owned the output, under long term agreement (through 2027) of the Rathdrum plant that came online in 2001. Avista Utilities simply assumed the Avista Energy tolling agreement originally signed with Rathdrum Energy LLC in 1998.

Beginning on January 1, 2010, Avista Utilities has agreed to purchase all of the plant output through 2027. The generating plant will be owned and operated by Rathdrum Energy LLC but dispatched as specified by Avista Utilities. In return for the right to dispatch and utilize plant output, Avista will pay a capacity charge, a fixed O&M charge, a variable O&M charge and will purchase and deliver all natural gas to fuel the plant. Avista will also incur fixed costs for gas pipeline capacity and transmission rights to Avista's system over BPA lines. Capacity and O&M charges will escalate at specified fixed and variable rates over the remaining life of the contract.

Q. Is the Lancaster Tolling Agreement reasonable?

A. Yes, based on my review of the information available at the time Avista utilities signed the Agreement (April 2007), I believe purchase of the output from the Lancaster CCCT was reasonable.

Q. How did you come to that conclusion?

A. I came to that conclusion by reviewing Avista's 2007 Integrated Resource Plan (IRP) and comparing the cost of the Lancaster Agreement to the cost of generation alternatives available to meet anticipated loads. At first glance, the tolling agreement looks somewhat self serving when viewed as part of the sale of Avista Energy.

For example, although the preferred portfolio identified in Avista's 2007 IRP called for up to 350 Mw of new combined cycle generating capacity by 2012, the Company did not issue a request for proposals (RFP) or obtain any competitive bids to acquire a CCCT resource. In addition, assumption of the tolling Agreement by Avista Utilities seemed to be a concession by Avista Corporation in order to sell its affiliate, Avista Energy. Finally, Avista Utilities did not hire an independent third party consultant to evaluate the economic benefit of acquiring the Lancaster output until after the transaction had already occurred.

Regardless of appearance, the real question is whether the transaction meets the reasonably anticipated needs of customers at reasonable price. While the tolling agreement was associated with an affiliate transaction and outside the usual RFP competitive bidding process, Avista had a demonstrated need and the Company's internal evaluation and that of an independent third party consultant provided extensive economic analysis of the transaction as compared to other alternatives.

As part of its evaluation, Staff reviewed the underlying tolling agreement, the internal net present value (NPV) comparison of alternatives performed by Avista, the discounted cash flow (DCF) comparative analysis of alternatives performed by Thorndike Landing LLC, the Northwest Power and Conservation Council forecasts of CCCT development costs and past and present CCCT surrogate cost estimates used to set Idaho published avoided cost rates.

In each case, the price paid for Lancaster over the life of the Agreement was lower than available CCCT alternatives. Moreover, when the price is compared to other more recent combined cycle resource acquisitions in the region, the purchase agreement appears even more valuable and beneficial to ratepayers.

Q. Did Avista show a need in 2007 for a resource of this size by 2010?

A. Pages 2-19 and 2-20 of Avista's 2007 IRP, shows projected capacity and energy short falls beginning in 2011. These pages also show the effect of Lancaster output on the Company's net positions through 2027.

Q. What does the tolling agreement cost Avista and its customers and how does that compare to other CCCT alternatives?

A. The net present value and DCF analysis performed by Avista and Thorndike, respectively, compared the

Lancaster tolling agreement to other theoretical tolling agreements based on capital construction costs of existing regional CCCT resources. The analysis also compared the agreement to expected costs to construct a new CCCT in the region.

The analyses show that the tolling agreement is essentially equivalent to a Company owned Greenfield plant with a capital cost of about $530/kW. Further analysis shows that the value of the tolling agreement is equivalent to paying up to $677/kW. The cost of the Tolling Agreement compares favorably to all estimates of new construction costs that likely would be incurred for a similar sized plant. For example, Avista's 2007 IRP shows new CCCT capital costs of $786/kW, PacifiCorp's 2007 IRP shows new cost ranging from $758 to $870/kW and Idaho Power's 2006 IRP estimates CCCT capital costs at $732/kW.

More recent examples of comparable CCCT transactions include the purchase by PacifiCorp of the existing 500 Mw Chehalis CCCT at a cost of approximately $610/kW. Recent RFPs issued by PacifiCorp and Idaho Power returned CCCT capital costs in the range of $1000 to $1300/kW. Current surrogate CCCT costs (which are based on current costs as reported by the Northwest Power and Conservation Council) used to establish the Idaho published avoided cost rate is $1100/kW.

According to the Company, 2010 fixed costs are expected to be $20.87 per Mwh at a 69% capacity factor. At gas prices ranging from $5 to $7/MMbtu, a heat rate of about 7000 kWh/MMbtu and variable O&M charges, 2010 generation cost could range from $58 to $72/Mwh.

Q. Has the Company included Lancaster Tolling costs in base rates?

A. No. Avista has requested that costs associates with the tolling agreement be passed through the PCA when the Company begins purchasing the output on January 1, 2010. Staff witness Hessing will address treatment of these costs through the PCA.

The PCA

Q. Has the Company proposed any changes to the PCA?

A. Yes, Company witness Johnson has proposed four changes to the PCA in this case. The first three changes dealing with tracking variations in third party transmission expense/revenues, tracking variations in PTC and the method of calculating the retail revenue credit will be address in the testimony of Staff witness Hessing.

I will address the Company's proposal to change PCA sharing from the current 90%/10% split to a 95%/5% split.

Q. What justification does the Company provide to support such a change in the sharing percentage?

A. Company witness Johnson was the only Company witness to address this issue. His one page justification was a description of how energy prices went from $88/Mwh in April of 2008 to $25/Mwh in June and how volatility in gas prices will become more significant for Avista with the addition of the Lancaster plant.

Q. Is the justification provided by the Company in this case sufficient to warrant a change in the PCA sharing percentage?

A. No, not in my view. While the Company has pointed to the volatility in gas and electric prices in 2008, it has not provided any information on how PCA sharing percentages have affected the Company over the life of the deferral mechanism. There is no demonstration of negative financial impact or how that might change if sharing percentages are modified. Idaho currently represents only about 36 percent of Avista's electric service with 64 percent of its services provided in Washington. Any financial benefit to the Company or its customers from changes in the Idaho PCA could be completely offset by actions in its Washington jurisdiction. Finally, the Company has not provided any rationale or supporting justification showing why current PCA sharing unduly penalizes the Company or why reducing its share of extraordinary power supply costs is appropriate at this time.

Q. Does this conclude your direct testimony in this proceeding?

A. Yes, it does.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY THAT I HAVE THIS 29TH DAY OF MAY 2009, SERVED THE FOREGOING **DIRECT TESTIMONY OF RANDY LOBB**, IN CASE NOS. AVU-E-09-1 & AVU-G-09-1, BY ELECTRONIC MAIL TO THE FOLLOWING:

DAVID J. MEYER
VICE PRESIDENT AND CHIEF COUNSEL
AVISTA CORPORATION
PO BOX 3727
SPOKANE WA 99220
E-MAIL: david.meyer@avistacorp.com

KELLY NORWOOD
VICE PRESIDENT – STATE & FED. REG.
AVISTA UTILITIES
PO BOX 3727
SPOKANE WA 99220
E-MAIL: kelly.norwood@avistacorp.com

DEAN J MILLER
McDEVITT & MILLER LLP
PO BOX 2564
BOISE ID 83701
E-MAIL: joe@mcdevitt-miller.com

SCOTT ATKINSON
PRESIDENT
IDAHO FOREST GROUP LLC
171 HIGHWAY 95 N
GRANGEVILLE ID 83530
E-MAIL: scotta@idahoforestgroup.com

CONLEY E WARD
MICHAEL C CREAMER
GIVENS PURSLEY LLP
PO BOX 2720
BOISE ID 83701-2720
E-MAIL: cew@givenspursley.com
mcc@givenspursley.com

DENNIS E PESEAU, Ph.D.
UTILITY RESOURCES INC
SUITE 250
1500 LIBERTY STREET SE
SALEM OR 97302
E-MAIL: dpeseau@excite.com

BETSY BRIDGE
ID CONSERVATION LEAGUE
710 N SIXTH STREET
PO BOX 844
BOISE ID 83701
E-MAIL: bbridge@wildidaho.org

ROWENA PINEDA
ID COMMUNITY ACTION NETWORK
3450 HILL RD
BOISE ID 83702-4715
E-MAIL: Rowena@idahocan.org

CARRIE TRACY
1265 S MAIN ST, #305
SEATTLE WA 98144
E-MAIL: carrie@nwfco.org

BRAD M PURDY
ATTORNEY AT LAW
2019 N 17TH ST
BOISE ID 83702
E-MAIL: bmpurdy@hotmail.com

Jo Nelson
SECRETARY