

From: [Rothlin, John](#)
To: [EFSEC mi Comments](#)
Subject: Transmission PEIS Scoping
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Attachments: [image001.png](#)
[Transmizzion PEIS AVA Final.pdf](#)

External Email

Please accept these comments from Avista corporation pertaining to Docket # 181034 – Transmission PEIS Scoping.

I recognize this is being submitted beyond the Sunday deadline but hope you will accept these as our good faith contribution to this rulemaking.

Best,

John Rothlin
Government Relations

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Avista Corp.

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July 26, 2024

Amí Hafkemeyer
Energy Facility Site Evaluation Council
621 Woodland Square Loop SE
Lacey WA 98503-3172

Re: Docket No. 181034 – Comments of Avista Utilities

Dear Ms. Hafkemeyer,

Avista Corporation (Avista) is an electric and natural gas utility headquartered in Spokane, Washington. We serve more than 400,000 electric utility customers in eastern Washington and Northern Idaho and own 2,800 miles of electrical transmission assets that reach from western Montana to Washington. Avista is also the Balancing Area Authority for the region in and around our service area.

We have a keen interest in timely siting of needed transmission while taking care to minimize and mitigate environmental impacts. Current processes are often fraught with uncertainties that result in years-long permitting delays. The development of a comprehensive programmatic environmental impact statement (PEIS) could help expedite needed transmission capacity increases to assist in the buildout of renewable resources and to move those resources to load centers in the region. This is an essential element to a clean energy transition. Avista supports development of a meaningful PEIS that would enable timely future transmission development.

We would offer a few observations as part of this initial scoping phase:

Avista encourages EFSEC to be as expansive as practical in the scoping of this PEIS. The more comprehensive the PEIS can be, the more likely it is to serve as a valuable tool for siting and the more streamlined the individual project review may be,

In addition to identifying potential impacts of transmission projects, Avista believes it is important that the PEIS identify executable avoidance, minimization and mitigation methods that could be used in siting, planning and design processes. We were pleased to see this element included in the presentation materials at the July 18 meeting. Recommended avoidance and mitigation measures allows applicants to recognize potential impacts and to concurrently offer appropriate steps to address them.

Finally, the prevalence of federal lands in the region introduces certain challenges that contribute to delays and uncertainties around meeting the federal governments trust responsibilities. We would request EFSEC consider defining the process and expectations for timelines for Section 106 reviews for historic preservation, and tribal consultation. Additionally, the PEIS should seek to improve coordination and avoid duplication of effort and resources when multiple reviews must take place. We recognize these are big issues to address in the PEIS, but we believe they would be instrumental in achieving timely transmission siting and development while still ensuring an appropriate review for resource preservation.

Thank you for the opportunity to comment on the scoping phase of this effort. We look forward to further discussions and participation in this docket.

Sincerely,

Darrell Soyars
Manager of Corp Environmental Compliance
Avista Corp.