

**BEFORE THE WASHINGTON
UTILITIES & TRANSPORTATION COMMISSION**

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION,

Complainant,

v.

AVISTA CORPORATION D/B/A/ AVISTA UTILITIES

Respondent.

DOCKETS UE-220053, UG-220054, and UE-210854 (Consolidated)

**AARON TAM
ON BEHALF OF THE
WASHINGTON STATE OFFICE OF THE ATTORNEY GENERAL
PUBLIC COUNSEL UNIT**

EXHIBIT AT-3

Vegetation Work Plan Analysis

July 29, 2022

Vegetation Analysis Summary

The tables and charts below compare miles completed with number of distribution trees remediated (removed, trimmed, and other work).

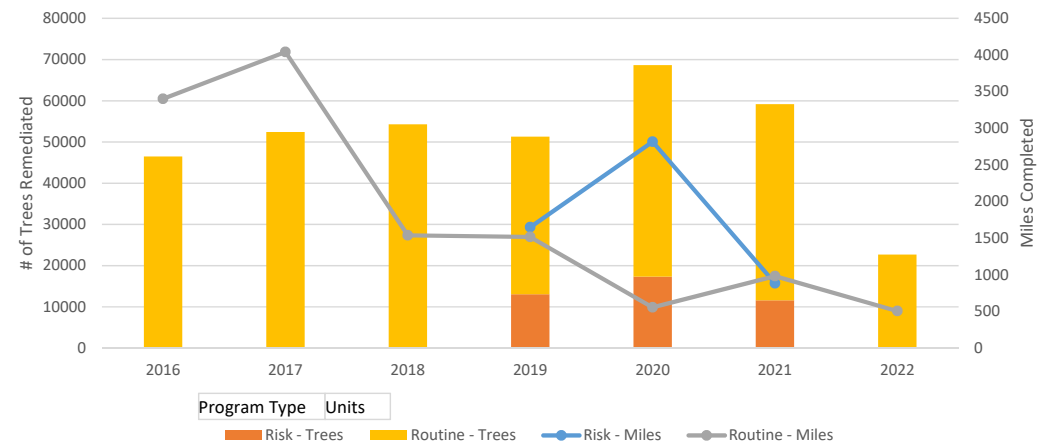
Program Type	Work Type	Year	Value	Units
Routine	Removed	2018	13761	Trees
Routine	Removed	2019	16747	Trees
Routine	Removed	2020	15246	Trees
Routine	Removed	2021	13915	Trees
Routine	Removed	2022	7270	Trees
Routine	Trimmed	2016	46459	Trees
Routine	Trimmed	2017	52425	Trees
Routine	Trimmed	2018	40503	Trees
Routine	Trimmed	2019	16607	Trees
Routine	Trimmed	2020	23035	Trees
Routine	Trimmed	2021	24385	Trees
Routine	Trimmed	2022	10146	Trees
Routine	Miles Completed	2016	3402	Miles
Routine	Miles Completed	2017	4041	Miles
Routine	Miles Completed	2018	1538	Miles
Routine	Miles Completed	2019	1516	Miles
Routine	Miles Completed	2020	555	Miles
Routine	Miles Completed	2021	981	Miles
Routine	Miles Completed	2022	504	Miles
Routine	Other work	2019	4858	Trees
Routine	Other work	2020	13043	Trees
Routine	Other work	2021	9262	Trees
Routine	Other work	2022	5266	Trees
Risk	Removed	2019	9943	Trees
Risk	Removed	2020	12897	Trees
Risk	Removed	2021	6294	Trees
Risk	Trimmed	2019	2731	Trees
Risk	Trimmed	2020	3686	Trees
Risk	Trimmed	2021	4910	Trees
Risk	Miles Completed	2019	1649	Miles
Risk	Miles Completed	2020	2815	Miles
Risk	Miles Completed	2021	883	Miles
Risk	Other work	2019	390	Trees
Risk	Other work	2020	725	Trees
Risk	Other work	2021	383	Trees

Work Type (All)

Sum of Value	Column Labels		Risk Total	Routine		Routine Total	Grand Total
	Risk Miles	Trees		Miles	Trees		
2016				3402	46459	49861	49861
2017				4041	52425	56466	56466
2018				1538	54264	55802	55802
2019	1649	13064	14713	1516	38212	39728	54441
2020	2815	17308	20123	555	51324	51879	72002
2021	883	11587	12470	981	47562	48543	61013
2022				504	22682	23186	23186
Grand Total	5347	41959	47306	12537	312928	325465	372771

Work Type

Sum of Value



Year

Source: PC DR 261

Routine and Risk Distribution Tree Work

The table below compare miles completed with number of distribution trees remediated (removed, trimmed, and other work) as shown in PC DR 261.

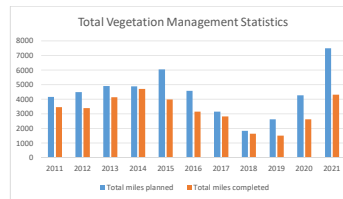
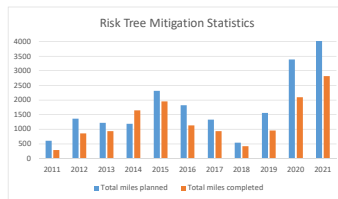
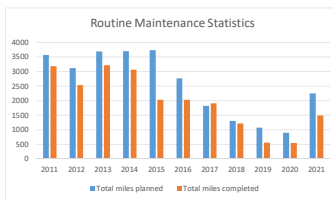
Program Type	Work Type	2016	2017	2018	2019	2020	2021	2022
Routine	Removed			13761	16747	15246	13915	7270
Routine	Trimmed	46459	52425	40503	16607	23035	24385	10146
Routine	Miles Completed	3402	4041	1538	1516	555	981	504
Routine	Other work				4858	13043	9262	5266
Risk	Removed				9943	12897	6294	
Risk	Trimmed				2731	3686	4910	
Risk	Miles Completed				1649	2815	883	
Risk	Other work				390	725	383	

Source: PC DR 261

Distribution Vegetation Work Plans

The table below synthesizes miles of distribution vegetation work completed in the past 12 years as shown in PC DR 182, Attachment A.

	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020	2021	10-yr avg	10-yr avg
Maintenance and ROW Statistics													
Current year planned miles	1663	1471	1712	1593	1448	1973	967	716	331	516	1550	1009	1267
Current year herbicide planned miles	1767	1364	1823	1190	1245								
Current year HPGL planned miles	34	115	7	219	264	44	13	125					
Prior years planned miles	102	167	142	695	775	744	841	458	739	382	699	644	522
Current year miles completed	1645	1129	1244	1218	878	1441	1270	870	215	285	986	845	1017
Prior years miles completed	102	167	142	437	545	545	623	241	343	255	507	419	355
Current year herbicide completed miles	1403	1213	1823	1190	514								
Current year HPGL completed miles	32	30	7	219	94	44	11	106					
Total miles planned	3566	3117	3684	3696	3732	2761	1821	1299	1070	898	2248	1653	1789
Total miles completed	3182	2539	3215	3064	2031	2030	1904	1218	558	540	1495	1264	1372
Total planned miles uncompleted	384	578	469	632	1701	731	92	82	513	358	753	392	416
% planned miles completed	89%	81%	87%	83%	54%	74%	105%	94%	52%	60%	67%	76%	77%
Risk Tree Mitigation Statistics													
Current year planned miles	605	1355	1210	979	2316	1688	481	322	807	2503	4075	1646	1486
Prior years planned miles	0	9	5	204	0	138	846	221	752	879	1171	668	384
Post-storm risk tree mile additions				799				292				292	545
Current year miles completed	286	846	929	646	1952	1021	80	49	644	1520	2190	918	924
Prior years miles completed		9	5	204		109	849	73	314	578	627	425	307
Total miles planned	605	1364	1215	1183	2316	1826	1327	543	1559	3382	5245	2314	1870
Total miles completed	286	855	934	1649	1952	1130	929	414	959	2098	2817	1391	1275
Total planned miles uncompleted	319	509	281	465	364	696	398	129	600	1285	2428	923	595
% planned miles completed	47%	63%	77%	139%	84%	62%	70%	76%	61%	62%	54%	60%	68%
Total Vegetation Management Statistics													
Total miles planned	4171	4481	4898	4879	6048	4587	3148	1843	2629	4280	7494	3997	4405
Total miles completed	3468	3394	4149	4713	3983	3160	2833	1632	1516	2638	4312	2582	3254
Total planned miles uncompleted	704	1087	749	186	2065	1427	315	211	1113	1642	3182	1315	1151
% planned miles completed	83%	76%	85%	97%	66%	69%	90%	89%	58%	62%	58%	67%	74%
% 2022 PIM Targets	54%	58%	64%	64%	79%	60%	41%	24%	34%	56%	56%		



Source: PC DR 182, Attachment A

Table No. 6 – Risk-Based Veg. Management Program Category Results and 2022 Goals

Risk-Based Vegetation Management Programs	2020	2021	2022 (Plan)
Transmission LIDAR (miles)	850	1,143	1,982
Distribution Satellite Imaging (miles)	n/a	7,675	7,675
Distribution Risk Tree (miles patrolled)	3,429	5,245	7,675
Distribution Risk Tree (miles remediated)	1,649	2,815	TBD
Transmission Risk Tree (miles patrolled)	1,355	2,270	2,270
Transmission Risk Tree (miles remediated)	2,715	1,362	TBD

Miles planned = distribution miles patrolled
Miles completed = distribution miles remediated

Measure 11 PIM: *96% inspection would result in incentive of \$500k, 94-95% would result in no incentive or penalty, anything less than 94%-would result in \$500k pen

2022 PIM Targets
Distributi 7675
Transmissi 2270

Source: Howell Exh. DRH-1T