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)*

RESPONSE TESTIMONY OF AARON TAM ADDRESSING THE FULL MULTIPARTY SETTLEMENT STIPULATION ON BEHALF OF THE WASHINGTON STATE OFFICE OF THE ATTORNEY GENERAL PUBLIC COUNSEL UNIT

EXHIBIT AT-1T

July 29, 2022

RESPONSE TESTIMONY OF AARON TAM ADDRESSING

THE FULL MULTIPARTY SETTLEMENT

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I. WITNESS IDENTIFICATION AND PURPOSE OF TESTIMONY

Q. Please state your name and business address.

A. My name is Aaron Tam, and I serve as Regulatory Analyst for the Public Counsel Unit of the Washington State Office of the Attorney General (Public Counsel). My business address is 800 5th Ave, Suite 2000, Seattle, Washington, 98104.

Q. On whose behalf are you testifying?

A. I am testifying on behalf of Public Counsel in this proceeding.

Q. Have you previously testified in this proceeding?

A. No, I have not yet testified in this proceeding.

Q. Please describe your educational background and your professional experience related to utility regulation.

A. I am a Regulatory Analyst and environmental policy specialist. I received a B.S. in Environmental Science and Resource Management and a B.A. in Political Science from the University of Washington in Seattle in 2016. In 2020, I received my Master of Public Administration degree with a Program Evaluation specialization from the Daniel J. Evans School of Public Policy and Governance at the University of Washington in Seattle. While completing my undergraduate studies, I served as a research assistant in the Pacific Wildland Fire Sciences Laboratory analyzing weather and fire smoke data in Oregon. While completing my graduate studies, I worked as a climate analyst for the City of Seattle and created their first-ever greenhouse gas inventory dashboard. My most recent position was as a consultant at Cascadia Consulting Company where I had broad responsibilities. I served as the leading technical analyst in the development of

Sound Transit's Sustainability Inventory Database. I also spearheaded the transition of Puget Sound region governments' greenhouse gas inventories onto a standardized online dashboard. During these greenhouse gas analysis projects, I collected and standardized utility-reported greenhouse gas and energy consumption data for greenhouse gas reporting. I have also conducted cost-effectiveness analyses, planned and facilitated stakeholder workshops, wrote climate action plans, climate mitigation plans, climate adaptation plans, and community engagement plans for local governments on the West Coast.

My current employment with Public Counsel began November 2021. Since joining the Attorney General's Office, I have worked on a variety of water, energy, and policy dockets, including Gold Beach Water Company General Rate Case (Docket UW-220206), Suncadia Water Company General Rate Case (Docket UW-220052), Puget Sound Energy Clean Energy Implementation Plan (Docket UE-210795), Distributed Energy Resource Cost-Effectiveness Rulemaking (Docket UE-210804), and PBR Policy Docket (Docket U-210590). I also participate in conservation advisory groups, IRP technical working groups, and low-income advisory groups for Puget Sound Energy and Northwest Natural Gas. Additionally, I completed the National Association of Regulatory Utility Commissioners' Utility Rate School in May 2022.

Q. What exhibits are you sponsoring in this proceeding?

A. I sponsor the following exhibits:

Exhibit AT-2 List of Avista Wildfire Metrics
Exhibit AT-3 Vegetation Work Plan Analysis

Exhibit AT-4	Wildfire Work Plan Analysis
Exhibit AT-5	Avista Corp. Response to Public Counsel Data Request No. 32
Exhibit AT-6	Avista Corp. Response to Public Counsel Data Request No. 101 with Attachment A
Exhibit AT-7	Avista Corp. Response to Public Counsel Data Request No. 123
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Exhibit AT-14	Avista Corp. Response to Public Counsel Data Request No. 196
Exhibit AT-15	Avista Corp. Response to Public Counsel Data Request No. 208 with Attachment A and F
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Exhibit AT-29	Avista Corp. Response to Public Counsel Data Request No. 313
Exhibit AT-30	Avista Corp. Response to Public Counsel Data Request No. 315 Revised

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

A. I have reviewed Avista's Wildfire Resiliency Plan (Wildfire Plan), proposed performance incentive mechanisms, and vegetation management plan in detail. My testimony presents Public Counsel's support for the additional tracking metrics in the Full Multiparty Settlement Stipulation (Settlement). I also provide recommendations and policy considerations for the Washington Utilities and Transportation Commission (Commission) with regard to the Wildfire Plan and performance tracking.

II. SUMMARY OF WILDFIRE RELATED ISSUES

Q. Please summarize Avista Utilities wildfire-related capital additions and expenses, the revisions the Company made after filing its original application, and the proposed settlement.

A. Avista Utilities (Avista or the Company) originally proposed recovery of capital additions related to its Wildfire Plan totaling $33,983,000 in Rate Year 1 and $17,694,000 in Rate Year 2 for the Washington jurisdiction.[1] This raises the electric revenue requirement by approximately $6 million in Rate Year 1 and $1.9 million in Rate Year 2.[2] The capital additions under the Company's Wildfire Plan mostly target grid hardening activities such as replacing wood cross arms with fiberglass, eliminating open wire secondary districts, or replacing obsolete equipment.[3] The Company also performs wildfire capital work on the

[1] *See* Direct Testimony of Elizabeth M. Andrews, Exh. EMA-1T at 28:2–12, Table No. 2.
[2] *See* Direct Testimony of David R. Howell, Exh. DRH-1T at 3:18–20.
[3] *See* Howell, Exh. DRH-1T at 16:1–15.

transmission network by replacing wood poles with tubular steel to ensure the transmission system is more resilient to wildfires.[4] Other capital additions include upgrading circuit reclosers and substations with Supervisory Control and Data Acquisition (SCADA) equipment to enable remote activation of Dry Land Mode (DLM) with additional fire modes.[5] Although the Company generally defined the areas for improvement, it did not specifically identify the quantities of planned work, location of that work, or other supporting details for the forecasted capital additions. Public Counsel witness Sebastian Coppola discusses these shortcomings in more detail in his direct testimony.[6]

The Final Order 08/05 in Consolidated Dockets UE-200900, UG-200901, and UE-200894 (Final Order 08/05) established that authorized capital additions would be subject to review and refund in the following General Rate Case.[7] The Final Order 08/05 also established the Wildfire Balancing Account to true-up wildfire expenses (excluding labor-related expenses) and allow refund to ratepayers or recovery for the Company of wildfire expenses that exceed or fall below the $3.1 million base level.[8] The first true-up is expected to occur on or about September 30, 2022.[9] The Company estimates its Washington Electric Deferred Wildfire Expenses for 2021–2022 at $3.5 million.[10] Increased operating

[4] *See* Howell, Exh. DRH-1T at 17:3–11.
[5] *See* Aaron Tam, Exh. AT-7 (Avista's Response to Public Counsel's Data Request No. 123).
[6] *See* Direct Testimony of Sebastian Coppola, Exh. SC-1CT.
[7] *Wash. Utils. & Transp. Comm'n v. Avista Corp.*, Dockets UE-200900, UG-200901, and UE-200894 (*consol.*), Order 08/05: Final Order, ¶ 253 (Sept. 27, 2021) (hereinafter "Final Ord. 08/05)".
[8] *Id.* ¶ 258.
[9] *Id.*
[10] *See* Andrews, Exh. EMA-1T at 62:7–11, Table No. 10.

expenses are mostly attributed to the Enhanced Risk-Based Vegetation Management Program, which includes annual identification of risk trees using ground crews, LiDAR, and satellite imagery.[11] This also includes expenses for two new programs, Fuel Reduction Partnerships and Customer Choice Right Tree Right Place.[12] The Company anticipates a deferred balance of $4.4 million (system-wide) as of December 31, 2022.[13] The Company requests an increased wildfire expense baseline for 2023 to approximately $5 million (Washington share only).[14]

The Company originally proposed a performance incentive mechanism (PIM) that would reward it with $500,000 for 96 percent inspection of transmission and non-urban distribution lines with a schedule or plan for mitigation. Inspection of 94–95 percent would result in no incentive or penalty, and anything less than 94 percent would result in a $500,000 penalty.[15] The Company also proposed an insurance balancing account that would follow a similar true-up process as the Wildfire Balancing Account.[16] A majority of the insurance increases relate to increasing wildfire insurance premiums.[17]

In Dockets UE-220053, UG-220054, and UE-210854 *(consolidated),* Avista, the Staff of the Washington Utilities and Transportation Commission, the

[11] *See* Andrews, Exh. EMA-1T at 60:11–61:6.
[12] *See* Andrews, Exh. EMA-1T at 61:1–6.
[13] *See* Tam, Exh. AT-6 at 2 (Avista's Response to Public Counsel's Data Request No. 101 with Attachment A).
[14] *Id.*
[15] *See* Direct Testimony of Patrick D. Ehrbar, Exh. PDE-1T at 35:2–9.
[16] *See* Andrews, Exh. EMA-1T at 64:2–67:13.
[17] *Id.* at 67:10–13.

Alliance of Western Energy Consumers, the NW Energy Coalition, The Energy Project, Sierra Club, Walmart, and Small Business Utility Advocates, jointly referred to as the "Settling Parties," agreed to a Full Multiparty Settlement Stipulation. The Settlement makes a few changes to the Company's wildfire-related expenses, PIMs, and metrics.[18] The Settlement accepts the Company's insurance balancing account with the condition that Avista bears the burden of supporting such deferrals, and that clarifies that this balancing account is non-precedential.[19] The Settlement states that Avista will not implement the financial PIMs that it proposed in this Docket.[20]

The Settlement states that Avista will report wildfire program metrics on an annual basis with both annual incremental amount and total cumulative amount, along with an annual incremental cost per wildfire mitigation component. The Company agreed to do this for the existing Wildfire Plan metrics (as shown in the table below) as well as 16 additional new wildfire metrics such as number of trees trimmed, number of hazard trees removed, number of reclosers installed, miles of wildland-urban interface (WUI), number and percent of distribution grid hardening projects planned vs completed, and more. [21]

Table 1: Avista's 2022 Wildfire Plan Metrics

	Metric
1	Tree Fall-Ins
2	Tree Grow-Ins
3	Pole Fires

[18] *See* Tam, Exh. AT-2 (List of Avista Wildfire Metrics).
[19] Full Multiparty Settlement Stipulation, ¶ 16 (filed June 28, 2022).
[20] *Id.* ¶ 23.
[21] *See* Tam, Exh. AT-2 at 2 (List of Avista Wildfire Metrics).

4	Overhead Equipment Failures
5	Spark Ignition Events
6	Transmission Steel Pole Conversions
7	Transmission Fire Resistant Pole Wraps Installed
8	Miles of Distribution Grid Hardening
9	Number of Dry Land Mode Automation Devices Installed
10	Risk Tree Miles Patrolled
11	Number of Risk Trees Identified/Mitigated
12	Acres of Transmission Corridors Cleared
13	Miles of LiDAR Imaging Completed
14	Miles of Satellite Imaging Completed

The Settlement also includes two electric reliability metrics for tracking outages and equipment failures during the Fire Season and outside of the Fire Season. To review the full list of wildfire-related metrics in the Settlement, please see Exhibit AT-2.[22]

III. SUMMARY OF PUBLIC COUNSEL POSITION AND RECOMMENDATIONS

Q. Does Public Counsel believe that Avista should receive financial incentives for the vegetation inspection goal established in its original proposal?

A. No. As Andrea Crane explains, it is currently premature to provide financial incentives for measures while there is a separate performance-based ratemaking proceeding currently underway.[23] Crane also argues that utilities should not be rewarded for performance that ratepayers should have a right to expect as part of their basic service charges.[24]

[22] *See* Tam, Exh. AT-2 at 2 (List of Avista Wildfire Metrics).
[23] *See* Response Testimony of Andrea C. Crane, Exh. ACC-1T at 13:4–12.
[24] *See* Crane, Exh. ACC-1T at 9:18–21.

In my Vegetation Work Analysis, I aggregated all of Avista's distribution vegetation work performed in 2021 (routine maintenance and risk tree mitigation) results in 7,494 miles inspected, which is 98 percent of their 7,675-mile distribution line goal.[25] Avista states that they are moving away from cycle-based trimming and toward a risk-based approach with a goal of identifying 100 percent of the risk trees on their system.[26] If Avista shifted all of their vegetation work under "routine maintenance" to their "risk tree" vegetation program, then the Company already would be achieving its Measure 11 requirement as of 2021.[27] Thus, the risk tree inspection PIM does not seem to compel the Company to do significantly more for wildfire mitigation than it already is doing.

Public Counsel also believes that PIMs should be tied to achieving certain outcomes, as elaborated in Crane's testimony.[28] The PIM does not require any remediation work to be completed for the incentive to be received, which would not properly encourage the Company to achieve wildfire mitigation outcomes. The Company confirmed in response to Public Counsel Data Request No. 32[29] that completion of mitigation is not a condition for receiving the incentive. Thus, under Avista's original proposal, the Company could receive a financial reward for inspecting and scheduling vegetation work but not actually completing that work. Public Counsel believes it is inappropriate to provide a financial reward

[25] *See* Tam, Exh. AT-3 (Miles Planned and Completed tab, Vegetation Work Plan Analysis).
[26] *See* Howell, Exh. DRH-1T at 34:1–8.
[27] *See* Howell, Exh. DRH-1T at 19:13–17. In 2020, Avista separated vegetation management into two programs based on the new Wildfire Resiliency Plan: Routine Maintenance and Risk-Tree Identification and Mitigation.
[28] *See* Crane, Exh. ACC-1T at 10:11–15.
[29] *See* Tam, Exh. AT-5 (Avista's Response to Public Counsel's Data Request No. 32).

since the outcomes do not adequately reflect a reduction in utility-caused wildfire risk.

Q. What is Public Counsel's position on the Settlement?

A. Public Counsel is not a party to the Settlement; however, Public Counsel supports some components of it. Public Counsel supports the agreement in the Settlement to not implement the PIMs proposed in the Company's initial filing. Public Counsel believes implementing the PIMs at this time would be premature given the concurrent policy docket addressing Performance Based Ratemaking pending before the Commission in Docket U-210590.[30] Public Counsel supports the additional wildfire metrics and service reliability metrics in the Settlement, which allow greater transparency and accountability into Avista's capital expenditures, operating expenses, and the utility's wildfire performance over time. Indeed, these metrics should already be tracked and made readily available by the Company. Puget Sound Energy, PacifiCorp, and utilities in California already track these kinds of metrics.[31]

Public Counsel also believes that certain adjustments need to be made to costs and proposals related to the Wildfire Plan. These include an adjustment to the baseline vegetation operating expenses, unsupported proposed increases in capital additions, the proposed Outage Management System replacement, and the

[30] *See* Crane, Exh. ACC-1T at 13:4–12.
[31] *See* Pacific Power Utils. Wash. Wildfire Mitigation Plan, *In re Utility Wildfire Preparedness*, Docket U-210254 (filed Apr. 14, 2022); *See also* Puget Sound Energy Wildfire Mitigation and Response Plan, *In re Utility Wildfire Preparedness*, Docket U-210254 (filed Apr. 15, 2022).

proposed establishment of the Insurance Balancing Account. Coppola's direct testimony discusses these issues in more detail.[32]

Q. Please summarize Public Counsel's recommendations.

A. With the exception of the adjustments to the baseline vegetation program operating expenses, the capital additions for 2023 and 2024, and the establishment of the Insurance Balancing Account, Public Counsel agrees with the remainder of the wildfire-related items in the Settlement.

Public Counsel recommends that Avista improve its Wildfire Plan generally by clarifying the definitions, purpose, and cost-basis of wildfire activities as I discuss in the next section below. Public Counsel recommends improvements in areas such as ignition tracking, reliability metrics, and communications and outreach in collaboration with peer utilities, community organizations, and other stakeholders. Public Counsel recommends that the Commission issue specific guidance in Docket U-210254 to utilities with regard to wildfire mitigation plans, including a standardized glossary of terms and standardized risk event and ignition reporting requirements.

IV. GENERAL IMPROVEMENTS TO THE WILDFIRE PLAN

Q. What general improvements to the Wildfire Plan are you recommending?

A. Public Counsel recommends Avista clarify the definitions, purpose, and cost basis of wildfire activities. These general improvements to the Wildfire Plan would

[32] *See* Coppola, Exh. SC-1CT.

provide the Commission and ratepayers with information on what wildfire activities customers are paying for with supporting evidence for cost recovery.

Q. How are the definitions of Wildfire Plan activities unclear?

A. The interchangeable use of terms is confusing and could hinder the ability of the Commission and stakeholders to examine, comprehend, and review Avista's activities. For example, the Company uses the terms "fire ignition," "spark event," and "spark ignition" in its Wildfire Plan but does not clearly define these terms. The Company clarified the terms in response to Public Counsel Data Request No. 175[33], but no such clarification is provided in the Plan itself. In the Company's response to Public Counsel Data Request No. 175, the Company explains that "A spark event and spark ignition event are the same, resulting when uninsulated conductors are contacted by foreign objects such as trees or branches or equipment failure which produces an electrical short circuit."[34] The Company goes on to say that "energy release is associated with electrical arcing and may cause a fire ignition." The Company did not clearly define fire ignition, but the Company makes clear that it is a potential result of a "spark event" or "spark ignition event" even though the terms are used interchangeably in the Wildfire Plan. The distinction between "spark" and "fire" ignitions are important since they signify different levels of risk. Clarity regarding ignition events is important for the Company, state agencies, and other stakeholders to assess the threat posed

[33] *Id.*
[34] *See* Tam, Exh. AT-8 (Avista's Response to Public Counsel's Data Request No. 175).

by individual events. The use of standardized terminology is also important so the Commission can compare employed practices and capabilities between utilities.

Q. How do unclear definitions impact performance metrics and performance incentive mechanisms?

A. It is especially critical to clarify the definition of terms in evaluating metrics and proposed PIMs as utilities seek to transition into performance-based ratemaking, since the definition of the terms significantly impacts whether specific targets are met. The originally proposed PIM, Measure 11, stated the following: "Complete a risk tree inspection of non-urban transmission and distribution electrical feeder miles on an annual basis, and schedule or plan for mitigation."[35] In addition to Public Counsel's general concerns regarding PIMs, as discussed in the testimony of Public Counsel witness Andrea C. Crane, this PIM was problematic because Measure 11's plain language did not specify the type of risk tree inspection required as a precondition for receiving the performance incentive. A risk tree inspection could mean an inspection by satellite or a visual inspection. This lack of clarity could have allowed the Company to receive the performance incentive by doing all risk tree inspection via satellite, which is still in a pilot phase. Although the Company clarified in Public Counsel Data Request No. 190 that the analysis of satellite imagery alone does not constitute a satisfactorily completed risk tree inspection of the distribution system,[36] the plain language of Measure 11 did not reflect this intent. The Company should define terminology used in

[35] *See* Ehrbar, Exh. PDE-1T at 33:21–23.
[36] *See* Tam, Exh. AT-12 (Avista's Response to Public Counsel's Data Request No. 190).

metrics and performance measures clearly. If goals are attached to these metrics and performance measures, then the conditions for meeting these goals should be clearly defined and delineated.

Q. Do clear definitions impact development of performance metrics and performance scorecards?

Yes. Clear definitions are important for the establishment of performance metrics and scorecards. For instance, in reference to vegetation management, the Company used the terms "miles inspected" and "miles planned" interchangeably, as well as "miles remediated" and "miles completed."[37] In testimony, David Howell provides a table of risk tree miles "completed" and "remediated."[38] The reported metrics are misleading because "miles completed" does not actually mean any remediation work was performed. The Company confirmed in response to Public Counsel Data Request No. 288 that a planned (or "patrolled") polygon of vegetation could have 100 percent miles planned and 100 percent miles completed (or "remediated") and require no actual remediation action.[39] My Avista Vegetation Work Plan Analysis[40] demonstrates that miles completed does not always correlate with tree remediation work performed.

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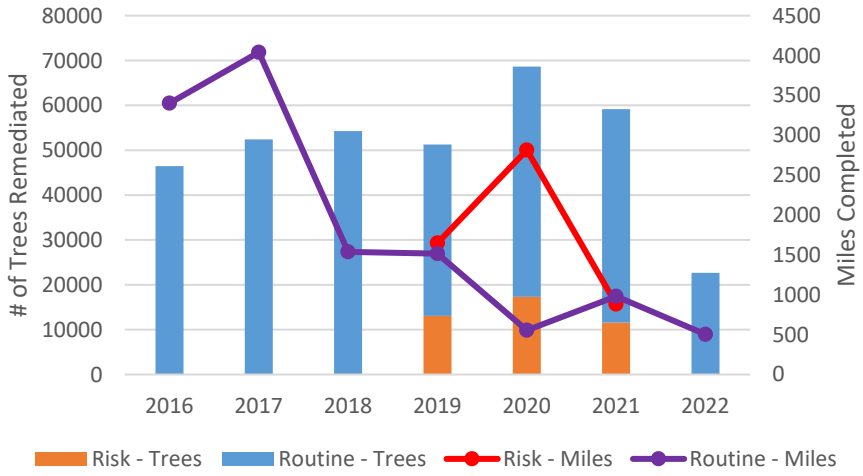
[37] *See* Tam, Exh. AT-20 (Avista's Response to Public Counsel's Data Request No. 288).
[38] *See* Howell, Exh. DRH-1T at 37:1–6, Table No. 6.
[39] *See* Tam, Exh. AT-20 (Avista Response to Public Counsel Data Request No. 288).
[40] *See* Tam, Exh. AT-3 (Vegetation Work Plan Analysis which is based on Tam, Exh. AT-16 (Avista Response to Public Counsel Data Request No. 261)).

Figure 1: Routine and Risk Trees Remediated[41] vs "Miles Completed"



Avista's wildfire metrics include miles patrolled, miles completed, and number of risk tree miles identified/mitigated separately, but it is important for Avista to clarify the distinction between these terms, so regulators and stakeholders can understand the work that Avista is actually doing. Avista should define wildfire metrics clearly in a glossary at the beginning of their Wildfire Plan, so that there can be a clear understanding amongst all parties on their meaning.

Q. Do other West coast jurisdictions provide standardized definitions of wildfire terminology to use as guidance?

A. Yes. California's Office of Energy Infrastructure Safety (Energy Safety) regulates and reviews the wildfire mitigation plans of the California utilities. It provides hundreds of pages of guidelines. An important component of these wildfire mitigation guidelines is the glossary which defines wildfire-related terminology,

[41] The term "remediated" includes removed and trimmed trees.

such as utility-related ignitions, wildfire risk, ignition probability, and risk events.[42] The guidelines are updated annually, which includes updating the use of terminology. Energy Safety appears to recognize that a common understanding of terminology is essential to communicating and understanding what utilities are doing to mitigate wildfire risk. Public Counsel believes that the Commission should issue specific guidance in Docket U-210254 on the use of terminology used in utility wildfire plans so that the utilities, state agencies, and stakeholders have a common understanding of wildfire-related activities.

Q. What are your recommendations to the Commission for Avista to provide clear definitions in their Wildfire Plan?

A. Public Counsel recommends that Avista convene other utilities and stakeholders to develop a standardized glossary of wildfire mitigation plan terms and definitions so all parties can have a clear understanding of wildfire program activities. Public Counsel also recommends that the Commission issue specific guidance in Docket U-210254 to utilities with regard to wildfire mitigation plans, including a glossary of terms.

Q. How can the wildfire mitigation components of the Wildfire Plan be improved?

A. The first improvement would be for the Company to specify the exact purpose of each wildfire program component and what risk each component is trying to

[42] Cal. Off. of Energy Infrastructure Safety, *2022 Wildfire Mitigation Plan Update Guidelines Template Office of Energy Infrastructure Safety*, Attach. 2 at 11–23 (Dec. 15, 2021) (Final 2022 Wildfire Mitigation Plan Guidance Document) https://energysafety.ca.gov/what-we-do/electrical-infrastructure-safety/wildfire-mitigation-and-safety/wildfire-mitigation-plans/2022-wmp/.

mitigate. In response to Public Counsel Data Request No. 176, the utility clarifies that most actions undertaken in the Wildfire Plan are intended to prevent utility-caused wildfires, with some actions protecting utility infrastructure from the impacts of wildfire. [43] The Company should provide descriptions of how programs are expected to "mitigate" wildfires similar to the explanation provided in response to Public Counsel Data Request No. 176 as shown in the table below. In that response, the Company clarifies that "mitigating wildfires" refers to programs that are meant to protect utility infrastructure against wildfire damage (also known as "resiliency") as well as to programs that are meant to reduce the chances of a utility-caused wildfire (also known as "protection").

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[43] *See* Tam, Exh. AT-9 (Avista's Response to Public Counsel's Data Request No. 176).

Figure 2: Wildfire Program by Primary Purpose[44]

Category	Program	Primary Purpose
Grid Hardening	Distribution Infrastructure Upgrades	Protection
	Converting Wood Transmission Poles to Steel	Resiliency
	Installing Fire Resistant Pole Wraps	Protection
	Enhancing Transmission Inspections	Resiliency
Risk Based Vegetation	100% Annual Risk Tree Inspection	Protection
Management	Transmission LiDAR Imaging	Protection
	Distribution Satellite Imaging	Protection
	Customer Choice Right Tree Right Place	Protection
	Fuel Reduction Partnerships	Protection
Situational Awareness	Dry Land Mode Operations	Protection
	Fire Weather Dashboard	Protection
	Substation SCADA	Protection
	Dry Land Mode Operating Devices	Protection
Operations &	Wildland Urban Interface Maps	Protection
Emergency Response	Emergency First Responder Training	Protection
	Expedited Fire Response	Protection

Metrics should be attached to each wildfire program component to measure the success and efficacy of investments over time. For instance, the primary purpose of fiberglass cross-arm replacements is to reduce pole fires and, thus, protect Avista infrastructure. Avista should track pole fires and fiberglass cross-arm replacements alongside each other to demonstrate the efficacy of the investment over time. As an extension of wildfire program components, Avista should be more transparent with the justification for cost increases over time and include detailed information for planned work.

In this rate case, Public Counsel recommends that the Commission disallow increases in spending in 2023 and 2024 above 2022 baseline levels due

[44] *See* Tam, Exh. AT-9 (Avista's Response to Public Counsel's Data Request No. 176).

to the lack of support for increased activities that justify those cost increases.[45] Public Counsel requested that the Company provide the units, quantities, and other data supporting capital additions from 2018 through 2021 in Public Counsel Data Request No. 208,[46] and from 2019–2024 in Public Counsel Data Request No. 211.[47] In its responses, the Company referred to their business cases, which did not provide the requested information or an adequate justification of projected capital additions.

In Public Counsel Data Request No. 305, Public Counsel asked again for units, quantities, wildfire metric targets, and other data that fall under each wildfire program for years 2020–2029 specifically for the Wildfire Plan.[48] In response, Avista provided a table with rough cost estimates per unit which required extrapolation of units of work performed and planned; however, the estimated units of work performed based on actual and budgeted total and incremental costs do not match actual work reported in the 2022 Wildfire Plan. For instance, Avista's 2022 Wildfire Plan reported that the incremental cost for transmission steel replacement ranged from $15,000 to $25,000 per structure.[49] I estimated that 218 to 364 steel-converted transmission poles in 2021 would occur based on these incremental cost estimates and the total 2021 transmission steel

[45] *See* Coppola, Exh. SC-1CT.
[46] *See* Tam, Exh. AT-15 (Avista's Response to Public Counsel's Data Request No. 208 with Attachments A and F).
[47] *See* Tam, Exh. AT-16 (Avista's Response to Public Counsel's Data Request No. 211).
[48] *See* Tam, Exh. AT-24 Attach. D (Avista's Response to Public Counsel's Data Request No. 305, with Attachment D).
[49] *See* Howell, Exh. DRH-2 at 10.

replacement expenditure of $5,455,000; however, the 2022 Wildfire Plan reported 896 steel-converted transmission poles.[50]

Additionally, some cost estimates for wildfire components differed significantly compared to the Wildfire Plan. In response to Public Counsel Data Request No. 305, Avista provided an estimate of $45,000 per transmission pole structure,[51] which would pay for 121 converted transmission poles in 2021 based on the actual 2021 total transmission steel replacement cost of $5,455,000. However, Avista provides conflicting steel pole conversion unit cost estimates that vary by $30,000.[52] Even worse, based on the actual number of transmission pole structures replaced and the total transmission pole structure replacement expenditures, the actual incremental cost of transmission pole replacements should be 10 times less than reported in the Wildfire Plan and in response to Public Counsel Data Request No. 305.[53]

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[50] *See* Tam, Exh. AT-4 (Wildfire Work Plan Analysis).
[51] *See* Tam, Exh. AT-24 Attach. D (Avista's Response to Public Counsel's Data Request No. 305, with Attachment D).
[52] $45,000/pole conversion (as listed in Avista's Response to Public Counsel Data Request No. 305) - $15,000/pole conversion (as listed in the 2022 Wildfire Plan) =$30,000/pole conversion incremental cost estimate difference.
[53] *See* Tam, Exh. AT-4 (Wildfire Work Plan Analysis).

Table 2: Estimated vs Actual Transmission Steel Pole Replacements[54]

Wildfire Mitigation Component	Cost ($/Unit)	Source	Units of Work 2020	2021	2022
Transmission Steel Replacement	$ 45,000	PC DR 305	2	121	89
Transmission Steel Replacement	$ 25,000	2022 Wildfire Plan, p. 10	3	218	160
Transmission Steel Replacement	$ 15,000	2022 Wildfire Plan, p. 10	5	364	267
Actual Transmission Steel Replacement	~$200-6,090	2022 Wildfire Plan, p. 12	368	896	852

Avista claims to be replacing equipment using a risk-based rather than a condition-based approach.[55] If this were the case, the utility already should have estimates of planned units for replacements readily available based on their wildland-urban interface (WUI) wildfire risk map, but the Company has not provided that data in a transparent manner upon request. As described, above, Public Counsel recommends Avista clarify the definitions, purpose, and cost-basis of wildfire activities, with an emphasis on specifying the particular risks mitigated by Avista's activities and tying those activities to the WUI wildfire risk map.

V. SPECIFIC WILDFIRE PLAN IMPROVEMENTS TO TRACK RISK EVENTS AND FIRE IGNITIONS

Q. **What is Avista doing in terms of tracking risk events and ignitions?**

A. Risk event is defined by California Energy Safety as:

> An event with probability of ignition, including wires down, contacts with objects, line slap, events with evidence of heat generation, and other events that cause sparking or have the potential to cause ignition. The following risk events all qualify as

[54] Based on cost estimates provided in Public Counsel Data Request No. 305, Attach. D and the Wildfire Plan. *See* Tam, Exh. AT-4 (Wildfire Work Plan Analysis) for more examples.
[55] *See* Tam, Exh. AT-27 (Avista Response to Public Counsel Data Request No. 311).

risk events:

- Ignitions
- Outages not caused by vegetation
- Vegetation-caused outages
- Wire-down events
- Faults

Other risk events with potential to cause ignitions.[56]

For risk events, the Company searches text strings in their Outage Management System (OMS) dispatcher notes.[57] The OMS is used to track electric outages, including causation information such as tree fall-ins, car-hit-pole, wind, animal, underground cable failure, overhead equipment, pole fires, and the like. Avista states, "The Company has not explicitly tracked wildfires in the past because our current outage management data is based upon cause, not impact.[58]" Avista notes that "fire is listed as an outage category, but most often relates to structure fires and is not typically associated with Avista equipment."[59] The Company admits that "[spark and fire ignition] events have been captured in Dispatcher comments which may be inconsistent."[60]

The Company relies upon the state and national fire organization data to track wildfires. The Department of Natural Resources collects high-level data on the number of fires, acres burned, cause, and applicable agency in Washington

[56] Cal. Off. of Energy Infrastructure Safety, *2022 Wildfire Mitigation Plan Update Guidelines Template Office of Energy Infrastructure Safety*, Attach. 2 at 20 (Dec. 15, 2021) (Final 2022 Wildfire Mitigation Plan Guidance Document), https://energysafety.ca.gov/what-we-do/electrical-infrastructure-safety/wildfire-mitigation-and-safety/wildfire-mitigation-plans/2022-wmp/.
[57] *See* Tam, Exh. AT-30 (Avista's Response to Public Counsel's Data Request No. 315 Revised).
[58] *See* Tam, Exh. AT-8 (Avista's Response to Public Counsel's Data Request No. 175).
[59] *Id.*
[60] *Id.*

State.[61] The Company has no further plans outlined in its 2022 Wildfire Plan to track spark or fire ignition data. The Company has no further planned expenditures for fire ignition tracking in their 2022 Wildfire Plan.[62] When asked in Public Counsel Data Request No. 313 why Avista removed further expenditures for fire ignition tracking, the Company responded that "revisions to this process will be captured in the scoping and requirements process for the planned replacement of the current Outage Management System."[63] The Company has not formally consulted with peer West Coast utilities on how to track or plans for fire ignitions.[64] The Company states that it has had informal discussions regarding tracking fire ignitions, and that other utilities follow a similar process of systematically searching the OMS database to extract information related to spark ignition events.[65] The Company attributes its inability to track spark and fire ignitions to their outdated OMS, but the Company does not provide information on how wildfire program managers, David James and David Howell have influenced the OMS Request for Proposal.[66]

Q. Why does risk event and ignition tracking matter?

A. Risk event and ignition tracking are important to understand the drivers of utility-caused ignitions and the appropriate mitigation strategies that can be implemented. Risk event and ignition tracking also ensures that investments made

[61] *See* Tam, Exh. AT-25 (Avista's Response to Public Counsel's Data Request No. 307).
[62] *See* Howell, Exh. DRH-2 at 22.
[63] *See* Tam, Exh. AT-29 (Avista's Response to Public Counsel's Data Request No. 313).
[64] *See* Tam, Exh. AT-30 (Avista's Response to Public Counsel's Data Request No. 315 Revised).
[65] *See Id.*
[66] *See* Tam, Exh. AT-28 (Avista Response to Public Counsel Data Request No. 312).

to reduce utility-caused wildfires or reduce the probability of ignitions actually are effective. Ideally, these risk event and ignition tracking investments should be started prior to implementation of wildfire programs in order to establish a baseline of data. Accurate tracking of risk events and ignitions also allows the utility to learn the details surrounding sources of ignitions.

For instance, in California, helium-filled metallic balloons are a leading cause of utility-caused fires. Pacific Gas and Electric's (PG&E) Asset Failure Analysis found that a greater percentage of fires caused by balloons were larger than 1/4 acre than fires attributed to other common ignition sources tracked by PG&E.[67] Such knowledge regarding the impact of metallic balloons could only be discovered through detailed tracking of ignitions. As a result of this discovery, California utilities pursued creative solutions to reduce ignition risk resulting from metallic balloons. PG&E supported legislation which would regulate balloons sold in California[68] and San Diego Gas and Electric (SDG&E) is currently pursing development of non-conductive balloons with a major balloon manufacturer.[69] SDG&E also adopted covered conductors which were estimated to be 99 percent effective against contact with metallic balloons.[70]

[67] *Help Graduates Celebrate Safety by Securing Balloons with a Weight,* Businesswire, (May 17, 2022, 2:22 PM), https://www.businesswire.com/news/home/20220517006153/en/Help-Graduates-Celebrate-Safety-by-Securing-Balloons-with-a-Weight.
[68] *Id.*
[69] San Diego Gas & Electric Company, *2020-2022 Wildfire Mitigation Plan Update* 346–347 (SDG&E 2021) https://www.sdge.com/2022-wildfire-mitigation-plan.
[70] San Diego Gas & Electric Company, *2020-2022 Wildfire Mitigation Plan Update*, Attach. H, at 10, Table 2 (SDG&E 2021) https://www.sdge.com/2022-wildfire-mitigation-plan (Attachment H: Joint IOU Response to Action Statement-Covered Conductor).

Avista, on the other hand, reported that 10 out of 17 utility-caused wildfires in the past five years were from unknown causes.[71] If Avista wants to truly adapt its Wildfire Plan over time, they need the necessary information to understand ignition drivers, and to adopt solutions appropriate for those particular drivers.

Q. What regulations guide wildfire plans and the tracking and reporting of metrics in Washington State?

A. Other than requirements to file wildfire mitigation plans in Docket U-210254, utilities are not subject to any specific regulations or requirements for mitigating utility-caused wildfires or standards for tracking metrics related to utility infrastructure impact on wildfires. A bill introduced last legislative session, SB 5803, would have directed Department of Natural Resources (DNR) to contract with a consultant to recommend a format and list of elements to be included in an electric utility wildfire mitigation plan. The bill would have required updates to wildfire mitigation plans every two years and required the UTC to review and affirm the wildfire mitigation plans. The bill did not pass last legislative session.

Q. **Why should utilities not wait for the legislature to do something about risk event and ignition standards?**

A. The legislature failed to pass SB 5803 last legislative session, which would have directed the DNR to hire a consultant to create a list of requirements for utility wildfire mitigation plans. Utilities are already making substantial investments to

[71] *See* Tam, Exh. AT-18 at 2, Table 1 (Avista's Response to Public Counsel's Data Request No. 283).

reduce the likelihood of utility-caused wildfires, and in order to evaluate the effectiveness of their investments, they should already be tracking wildfire-related data to establish a baseline.

Avista requested tens of millions of dollars in this general rate case to replace its OMS. The Company attributes its inability to track spark and ignition events due to its outdated OMS, yet the Company has not proven that it has done due diligence by consulting with its own wildfire program managers to plan the OMS replacement, consulting with peer utilities on how to track ignitions to incorporate that information into the new OMS, or evaluating what expenditures and actions it actually must take to track risk events and ignitions.

Q. What kind of guidance do California utilities have in regards to wildfire metrics?

A. California Energy Safety ensures electrical utilities are taking effective actions to reduce utility-related wildfire risk. The office was established on July 1, 2021, before which utility-related wildfire risk was managed by the California Public Utilities Commission (CPUC) Wildfire Safety Division. Energy Safety provides detailed guidelines for utilities on their wildfire mitigation plans, including a template for the plan itself as well as one for tracking metrics.[72] The Excel tracking metrics template includes:

- inspection metrics,

[72] Cal. Off. of Energy Infrastructure Safety, *2022 Wildfire Mitigation Plan Update Guidelines Template Office of Energy Infrastructure Safety*, Attach. 3 (Dec. 15, 2021) (2022 Final Wildfire Mitigation Plan Guidance Document), https://energysafety.ca.gov/what-we-do/electrical-infrastructure-safety/wildfire-mitigation-and-safety/wildfire-mitigation-plans/2022-wmp/.

- outcome metrics from risk events and ignitions,
- fatalities from wildfire mitigation initiatives,
- injuries from wildfire mitigation initiatives,
- weather pattern metrics,
- drivers of risk events,
- drivers of ignitions,
- state of service territory and utility equipment,
- actual and planned utility equipment additions or removal,
- location of actual and planned utility infrastructure upgrades year over year,
- use of Public Safety Power Shutoff,
- and mitigation initiative financials.[73]

Utilities report their wildfire metrics on a quarterly basis, and provide past historical data back until 2015 plus projected data for the current year and following year.[74] California utilities report drivers of risk events using standardized risk event categories (e.g., wire down event-distribution, outage-distribution, etc.), cause categories (e.g., contact from object-distribution, equipment/facility failure-distribution, utility work/operation, vandalism/theft, etc.), and sub-cause categories (e.g., veg. contact- distribution, animal contact-distribution, balloon contact-distribution, insulator damage or failure-distribution,

[73] *Id.*
[74] *Id.*

etc.).[75] California utilities also track ignition drivers by line type and High Fire Threat District (HFTD) tier.[76]

While under the jurisdiction of the CPUC, utilities were required to report fire incidents annually with detailed information on:

- fire start time (date, time),
- location (latitude, longitude, material at origin, land use at origin),
- fire (size, suppressed by, suppressing agency),
- utility facility (facility ID, other companies,
- voltage, equipment involved, type),
- outage (was there an outage, date, time),
- field observations (suspected initiating event, equipment/facilities failure, and contact from object, facility contacted, and contributing factors).[77]

California utilities still are required to report this ignition information under their quarterly spatial data reporting, as described in Energy Safety's Geographic Information Systems Data Standard.[78]

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[75] *Id.*
[76] *Id.*
[77] Cal. Off. of Energy Infrastructure Safety*, 2022 Wildfire Mitigation Plan Update Guidelines Template Office of Energy Infrastructure Safety*, Attach. A at C-4 (Dec. 15, 2021) (Final 2022 Wildfire Mitigation Plan Guidance Document), https://energysafety.ca.gov/what-we-do/electrical-infrastructure-safety/wildfire-mitigation-and-safety/wildfire-mitigation-plans/2022-wmp/.
[78] Cal. Off. of Energy Infrastructure Safety, *2021 Geographic Information Systems Data Standard Version 2.1* at 69–74 (2021) https://energysafety.ca.gov/wp-content/uploads/energy-safety-gis-data-reporting-standard_version2.1_09072021_final.pdf (last visited July 18, 2022).

Q. What are Washington peer utilities doing in terms of tracking spark events and ignition events?

A. Puget Sound Energy (PSE) is implementing a new software solution and formalizing data logging practices amongst their operators to track fire ignitions better.[79] PSE is finalizing logging procedures in its OMS for the 2022 wildfire season to be able to separate out events that are specific to wildfire risk reduction and include identification codes for a variety of scenarios in which field personnel have identified the presence of arcing energy or signs of fire. These logging procedures also would allow for identification of the equipment and/or device involved in the event and easy retrieval of data to be analyzed and incorporated into future wildfire mitigation and response plans. PSE also has improved its situational awareness by equipping drones with a thermal or infrared radiation camera, to detect failing insulators or coronas from electricity tracking from conductors to other parts of the structure.[80]

PacifiCorp does not track ignitions, and it uses outage data as a proxy for fire ignition risk.[81] The Company estimates ignition risk by classifying outage cause categories and multiplying it by a percent likelihood contribution to fire ignition within and outside the Fire High Consequence Areas (FHCA). PacifiCorp is experimenting with wildfire cameras on utility infrastructure, in collaboration

[79] *See* Puget Sound Energy Wildfire Mitigation and Response Plan at 5, *In re Utility Wildfire Preparedness,* Docket U-210254 (filed Apr. 15, 2022).
[80] *See id.*, Attach. A at 17.
[81] *See* PacifiCorp Wildfire Mitigation and Response Plan Attach. A at 16, *In re Utility Wildfire Preparedness,* Docket U-210254 (filed Apr. 14, 2022).

with the Oregon Department of Forestry and Distributed Fault Anticipation technology. PacifiCorp has 19.8 line miles in FHCA in Washington State.[82]

Q. Does Avista have experience with standardizing its data collection and tracking processes?

A. Yes. Last year, the Company improved standardization of how vegetation work data was being collected and reported, which improved data accuracy by 95 percent or better.[83] These efforts indicate that the Company sees value in standardizing data collection and reporting. The Company should similarly aim to standardize risk event and ignition tracking. Public Counsel provides its recommendations and improvements to the Company's current risk event and ignition tracking, below.

Q. What does Public Counsel recommend in terms of risk event and ignition tracking?

A. Avista currently takes a passive and reactive approach to ignition tracking and wildfire data tracking. Of the major IOUs in Washington State, Avista has the greatest amount of territory identified as FHCA, and Public Counsel believes that it should be at the forefront of wildfire mitigation in this state. Public Counsel recommends that Avista formalize its logging procedures within its existing OMS with identification codes to capture and retrieve data on the cause of ignitions and their impacts. The Company currently has no formalized process for recording the

[82] *See id.*, at 12.
[83] *See* Tam, Exh. AT-14 (Avista's Response to Public Counsel's Data Request No.196).

impacts of ignitions in its OMS, and the use of text string search for key terms produces disorganized and inconsistent results.[84]

Public Counsel also recommends that Avista formally consult with peer West coast utilities on how they detect and track risk events and ignitions, so the Company can learn and assess additional methods of ignition detection and wildfire metrics tracking. Avista should also investigate and evaluate the usefulness of fire detection technologies such as fire cameras,[85] fire detection software, drones with thermal cameras, and satellite fire detection in improving its ignition detection capabilities.

California already has done significant work in this area, and Washington utilities can adapt and build upon this work. Public Counsel recommends Avista track non-spatial risk event and fire ignition by using metrics included in Tables 2, 6, 7.1, and 7.2 of Attachment 3 in the Energy Safety Wildfire Mitigation Plan Non-Spatial Data Template.[86] Avista should also report spatial risk and ignition event data which includes geotagging of a risk event photo log, a risk event asset log, and ignition event details as described in Energy Safety's Geographic Information Systems Data Standard.[87] Public Counsel recommends the

[84] *See* Tam, Exh. AT-8 (Avista Response to Public Counsel Data Request No. 175).
[85] Fire cameras are sometimes installed and used in collaboration with universities and fire districts. An example of this kind of partnership is AlertWildfire (https://www.alertwildfire.org/).
[86] Cal. Off. of Energy Infrastructure Safety, *2022 Wildfire Mitigation Plan Update Guidelines Template Office of Energy Infrastructure Safety*, Attach. 3 (Dec. 15, 2021) (2022 Wildfire Mitigation Plan Guidance Document), https://energysafety.ca.gov/what-we-do/electrical-infrastructure-safety/wildfire-mitigation-and-safety/wildfire-mitigation-plans/2022-wmp/.
[87] Cal. Off. of Energy Infrastructure Safety, *2021 Geographic Information Systems Data Standard Version 2.1* at 69–74 (2021) https://energysafety.ca.gov/wp-content/uploads/energy-safety-gis-data-reporting-standard_version2.1_09072021_final.pdf (last visited July 18, 2022).

Commission adapt best practices from California Energy Safety and issue specific guidance in Docket U-210254 which should include uniform, regular risk event and ignition reporting requirements across all Washington investor-owned utilities.

VI. ADDITIONAL RELIABILITY METRICS

Q. What additional reliability metrics does Public Counsel recommend?

A. Public Counsel recommends that Avista adopt reliability metrics that track outages and ignitions from trees outside the utility corridor, as well as track outages during different Dry Land Mode (DLM) settings.[88] Avista has reported that four out of the 17 wildfire-related claims in the past five years were caused by trees falling from outside of the utility corridor.[89] This is the single greatest known cause of utility-caused wildfires. By tracking this data, the Company can assess where and when patterns of tree fall-ins outside the utility corridor occur. The Company then can test and evaluate new wildfire mitigation strategies that reduce tree fall-ins from outside the utility corridor.

Avista is currently upgrading its circuit reclosers to support full automation with four levels of reclosing operations in DLM.[90] The settings have the potential to reduce fire risk but also puts customers at greater risk for service disruptions due to the potential for extended duration of the outage, estimated to be 12 to 36 hours.[91] Public Counsel issued data requests to the Company

[88] During fire season, Avista transitions into the mode of limiting the number of circuit recloses. This operating mode is called Dry Land Mode.
[89] *See* Tam, Exh. AT-18 (Avista Response to Public Counsel Data Request No. 283).
[90] *See* Howell, Exh. DRH-1T at 26:9–32.
[91] *See* Howell, Exh. DRH-1T at 42:16–19.

requesting information about the impacts of DLM settings on service reliability. The Company reported in response that it does not currently track this, but does investigate the cause of outages and is able to relate DLM protection settings to specific outage events.[92] Once the Company knows the nature of the fault incident it could estimate the impact of additional DLM fire modes on service reliability. This would be important to track over time so the Company can understand the impacts of protection settings and adjust them as necessary to balance service reliability and fire ignition risk. Public Counsel recommends that Avista track additional metrics surrounding DLM settings and trees outside the utility corridor, so it can adaptively manage their newest service reliability risk and their historically most dangerous wildfire risk.

VII. IMPROVEMENTS TO COMMUNICATIONS AND OUTREACH

Q. What is Avista's current communications and outreach strategy?

A. Avista does not include its communications and outreach strategy in its Wildfire Plan, as Public Counsel learned by obtaining the utility's wildfire communications plan through a data request. Avista's 2022 Wildfire Communications Plan objectives include[93] :

- Building awareness amongst key stakeholders of Avista's actions and investment in mitigating the risk of wildfires.

[92] *See* Tam, Exh. AT-21 (Avista's Response to Public Counsel's Data Request No. 289) and Tam, Exh. AT-11 (Avista's Response to Public Counsel's Data Request No. 181).
[93] *See* Tam, Exh. AT-22 Attach. A at 3 (Avista's Response to Public Counsel's Data Request No. 290 with Attachment A).

- Instilling confidence in Avista as a proactive and responsible corporate citizen.
- Providing examples of the Wildfire Plan in action and showing progress as it is implemented.
- Engaging customers in programs that impact them and their communities.

Avista focuses its communication and outreach efforts on general wildfire awareness and customer preparedness, vegetation management, operational awareness, and grid hardening.[94] Avista plans to communicate on these topics to customers through a variety of channels: through its website, newsletters, social media posts, targeted articles to business and community leaders, presentations for Regional Business Managers, press releases, and postcards.[95] Avista currently does not translate any wildfire materials into languages other than English.[96]

Currently, 169,983 Washington customers are subscribed to either emails or SMS/text alerts, but 78,019 Washington customers are not subscribed to either emails or SMS/text alerts. [97] Avista mentions in its comment letter for its 2022 Wildfire Plan that it began working with Spokane County organizations including emergency services, social service agencies, and community-based organizations

[94] *See* Tam, Exh. AT-22 Attach. A (Avista's Response to Public Counsel's Data Request No. 290 with Attachment A).
[95] *Id.*
[96] *See* Tam, Exh. AT-26 (Avista's Response to Public Counsel's Data Request No. 309).
[97] *See* Tam, Exh. AT-22 Attach. A (Avista's Response to Public Counsel's Data Request No. 290 with Attachment A).

to gain a better understanding of how to support vulnerable populations during emergency events.[98]

Avista identified 189 Life Support customers or Emergency Medical Certificate customers who must maintain connection to utility service to preserve medical device functionality or for other medical reasons.[99] These customers receive direct calls from the Company regarding planned outages, active collections with pending disconnect, requests for certification paperwork, follow-ups on prior discussions, and a referral return calls.[100] Avista customers must self-identify as a Life Support customer to receive these special notifications.

Q. What are peer utilities doing in regards to wildfire communications and outreach strategies?

A. PSE's key wildfire communication strategies to customers include local news media (broadcast, digital, and print), social media, digital advertising communications, telephone calls, website and mobile application communications, and deployment of community engagement team members.[101] It plans to develop their communication strategies further by potentially including automated systems for proactive notifications based on customer preferences, translation of materials in multiple languages, interactive online tools, and specialized notifications and outreach to customers with medical needs. PSE

[98] Avista Wildfire Resiliency Cover Letter at 8, *In re Utility Wildfire Preparedness,* Docket U-210254 (filed Apr. 15, 2022).
[99] *See* Tam, Exh. AT-19 (Avista's Response to Public Counsel's Data Request No. 287).
[100] *Id.*
[101] Puget Sound Energy Wildfire Mitigation and Response Plan Attach. A at 28, *In re Utility Wildfire Preparedness,* Docket U-210254 (filed Apr. 15, 2022).

hosted a virtual town hall with customers on two of its highest risk circuits to educate and gather feedback on potential future wildfire mitigation measures, including Public Safety Power Shutoff (PSPS).[102] PSE tracks key communications and outreach performance metrics such as customer participation/feedback from community meetings, customer communication via multiple channels, number of meetings with fire agencies, and number of meetings with forest land agencies.[103]

PacifiCorp's key wildfire communication strategies to customers include: paid media campaign (radio, newspaper, digital, social media ads), partnerships with Public Safety Partners and Community-Based Organizations (CBOs), informational flyers and brochures for CBOs and Public-Safety Partners, updating its webpage, and conducting webinars. PacifiCorp allows customers to self-identify as having access and functional needs (AFN).[104] PacifiCorp also engaged a vendor to survey those with AFN. As a result of the survey, PacifiCorp has partnered with local and regional agencies to better reach AFN customers, and PacifiCorp may produce translated brochures to encourage customers to self-identify as having medical needs dependent on electricity.[105] PacifiCorp has

[102] *Id*.
[103] *Id.* at 35.
[104] The Centers for Disease Control and Prevention defines access and functional needs as "individuals with and without disabilities, who may need additional assistance because of any conditions (temporary or permanent) that may limit their ability to act in an emergency." *See* Centers for Disease Control and Prevention, *Access and Functional Needs Toolkit: Integrating a Community Partner Network to Inform Risk Communication Strategies* at 1 (U.S. Dept. of Health & Human Services, March 2021). https://www.cdc.gov/cpr/readiness/00_docs/CDC_Access_and_Functional_Needs_Toolkit_March2021.pdf
[105] PacifiCorp Wildfire Resiliency Attach A. at 58–59, *In re Utility Wildfire Preparedness,* Docket U-210254 (filed Apr. 14, 2022).

extensive translation services in place. On its website, PacifiCorp has a message translated into nine languages that directs customers who need language assistance to a customer agent who can assist them further. PacifiCorp has translated all wildfire-related messaging translated into Spanish. PacifiCorp employs Spanish-speaking customer care professionals and contracts with a 24/7 translation service that translates communications in real-time over the phone in Cantonese, Mandarin, Tagalog, Vietnamese, and a variety of other languages and dialects. Customer care agents are trained on how to facilitate a conversation between the customer and translation services to ensure the customer receives wildfire safety and preparedness or PSPS-related information they seek.[106]

Q. What changes to Avista's wildfire communications and outreach plan is Public Counsel recommending?

A. Public Counsel recommends that Avista track wildfire-related communication and outreach metrics, improve AFN outreach, provide translated wildfire-related materials, and conduct more direct community engagement with CBOs that work with AFN and customers with limited English proficiency (LEP). PSE and PacifiCorp appear to have performed more direct community outreach in regards to wildfire issues. PacifiCorp has done more to provide accessible wildfire resources and information to LEP and AFN populations. Avista has the largest Wildland Urban Interface and fire risk territory of any IOU in Washington state and plans on implementing a new DLM fire mode settings that could extend

[106] *Id.* at 56–58.

outage duration, so it is critical that they provide accessible wildfire and service reliability resources and information to their customers—especially for highly impacted communities and for AFN, LEP, and vulnerable populations.

Public Counsel recommends that Avista track metrics on translated wildfire-related materials, languages provided for written and telephonic customer support, customer reach and engagement via multiple channels, customer participation/feedback, number of identified AFN customers, and customers receiving service reliability and wildfire updates by text/SMS, email, or mobile app. California utilities also track complaints related to utility initiatives (e.g., vegetation management),[107] and Avista should do the same since the success of its Wildfire Mitigation Plan relies on increased vegetation management.[108] Improved communications and outreach are essential to the safety and satisfaction of customers as well as the success of the wildfire program as a whole, so Avista should track these metrics to improve accountability and ensure progress.

Avista currently conducts no further outreach to identify customers with access and functional needs.[109] AFN customers must self-identify to receive special notifications and information on supportive resources for extended outages. Avista should seek local and regional partnerships to better identify AFN customers. Partnerships with local and regional partnerships will allow the

[107] Cal. Off. of Energy Infrastructure Safety, *2022 Utility Wildfire Mitigation Maturity Survey,* at 166 https://energysafety.ca.gov/what-we-do/electrical-infrastructure-safety/wildfire-mitigation-and-safety/wildfire-mitigation-plans/2022-wmp/.
[108] *See* Howell, Exh. DRH-1T at 33:14–23.
[109] *See* Tam, Exh. AT-19 (Avista's Response to Public Counsel's Data Request No. 287).

Company to identify more AFN customers and give these customers better resources to make it through extended outages.

Avista's support for LEP customers seems to be lacking, since they currently do not translate any wildfire-related communications.[110] According to the Department of Commerce, Adams County has been identified as a county where 29 percent of persons spoke English less than "very well" and 50.6 percent of persons lived in households where Spanish is spoken.[111] According to the American Census Bureau, 65.5 percent of the population in Adams County identifies as Hispanic or Latino.[112] At the very least, the utility should be providing wildfire communications and language support in Spanish. Adams County is a region in Avista's wildland-urban interface (WUI) Tier 1 service territory[113] and the Department of Commerce's LEP map. Public Counsel recommends that the Company provide translated wildfire materials at the very least in Spanish due to having a region with the highest LEP needs in the state. Avista should also engage with local CBOs that work with LEP customers in Adams County to receive feedback and improve language accessibility.

[110] *See* Tam, Exh. AT-26 (Avista Response to Public Counsel Data Request No. 309).
[111] *Languages Spoken at home (mapped by County),* Off. of Fin. Mgmt., (last updated Aug. 4, 2021) https://ofm.wa.gov/washington-data-research/statewide-data/washington-trends/social-economic-conditions/language-spoken-home/languages-spoken-home-mapped-county.
[112] U. S. Census Bureau*, QuickFacts Adams County, Wash*., https://www.census.gov/quickfacts/fact/table/adamscountywashington/PST045221 (last visited July 13, 2022).
[113] *See* Direct Testimony of David R. Howell, Exh DRH-5 at 2, *Wash. Utils. & Transp. Comm'n v. Avista Corp.,* Dockets UE 200900, UG-200901 & UE-200894 (*consol.*) (filed Oct. 10, 2020).

VIII. SUMMARY OF RECOMMENDATIONS

Q. Please summarize your recommendations with regard to the provisions of the Settlement that address PBR metrics and PIMs.

A. **General Improvements to the Wildfire Plan:**

- Avista should clarify Wildfire Plan terminology in a glossary as well as clarify the purpose and cost-basis of wildfire programs.
- Avista should work with peer utilities and stakeholders to come to a mutual agreement on wildfire mitigation plan terminology.
- The Commission should issue specific guidance in Docket U-210254 on required wildfire mitigation plan elements, which should include a standardized glossary of terms.

Risk Event and Ignition Tracking Improvements:

- Avista should formally consult with peer utilities on how they detect and track risk events and ignitions.
- Avista should investigate and evaluate the usefulness of fire detection technologies.
- Avista should report spatial and non-spatial risk events and ignition metrics using California Energy Safety templates and guidelines.
- The Commission should issue specific guidance in Docket U-210254 on regular reporting requirements for spatial and non-spatial risk and ignition event metrics.

Reliability Metrics:

- Avista should track additional reliability metrics around DLM and trees outside the utility corridor.

Communications and Outreach:

- Avista should provide translated wildfire materials in the dominant non-English languages in its service territory, or, at the very least, in Spanish.
- Avista should track the specified communications and outreach metrics.
- Avista should engage with local and regional partnerships to identify AFN customers and engage with local community-based organizations to improve language accessibility for LEP customers.

These improvements to the Wildfire Plan would provide the Commission and ratepayers with information as to how and where capital and O&M spending is directed and what is actually being accomplished. Improvements in fire ignition tracking would allow the Company to evaluate the efficacy and prudency of its wildfire program activities better. Adding more outage reliability metrics would allow the Company to adjust dynamic protection settings to balance reliability and safety, as well as to evaluate other wildfire mitigation measures. Requiring communications and outreach standards will compel the Company to engage more directly with customers and particularly those with Access and Functional Needs (AFN) and Limited English Proficiency (LEP). The Commission should issue specific guidance to utilities on wildfire mitigation plan elements and wildfire-related metric reporting requirements in Docket U-210254 which should

include a glossary, an expected list of elements, and risk event and ignition metrics.

Q. Do the recommendations contained in your testimony promote equity among the ratepayers of Avista?

A. Yes, the recommendation to include geographic tracking of risk events and ignitions will provide valuable information regarding the disparities in wildfire safety and service reliability between highly impacted communities, vulnerable populations, and all other customers. It also will allow Avista to adaptively manage their Dry Land Mode (DLM) settings to optimize wildfire safety and service reliability. The addition of communications and outreach requirements and metrics also will ensure that the Company is making progress towards engaging AFN and LEP communities. For these reasons, the recommendations proposed by Public Counsel promote equity and the Commission should adopted them.

Q. Does this conclude your testimony?

A. Yes, it does.