

**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-20

Avista's Response to Public Counsel Data Request No. 288

July 29, 2022

**AVISTA CORP.
RESPONSE TO REQUEST FOR INFORMATION**

JURISDICTION:	WASHINGTON	DATE PREPARED:	05/17/2022
CASE NO.:	UE-220053 & UG-220054	WITNESS:	David Howell
REQUESTER:	Public Counsel	RESPONDER:	Heather Webster
TYPE:	Data Request	DEPT:	Asset Maintenance
REQUEST NO.:	PC – 288	TELEPHONE:	(509) 495-8930
		EMAIL:	heather.webster@avistacorp.com

SUBJECT: Wildfire Plan, Avista’s Response to Public Counsel Data Request No. 182, Attachment A.

REQUEST:

Avista provided copies of its vegetation work plans in Attachment A in response to Public Counsel Data Request No. 182. Please elaborate on the following terms in regard to the Company’s vegetation management plans:

- a) Please define “miles planned” and explain how the Company determined how many miles to plan each year.
- b) Please define “miles completed” and what completion entails.
- c) Has the definition and the methods of determining “miles planned” and “miles completed” changed over time? If yes, how so and when did the definitions and methods change?
- d) Please define “DX Work Plan”.
- e) Please define “ROW” work type.
- f) Please define “HPGPL”.
- g) Please define what is in the “herbicide plan” used in the past and whether it is categorized under current “routine maintenance” work, “risk tree” work, or a separate category?
- h) In the 2020 vegetation work plan, why was work planned for future years completed in 2020?
- i) In the 2021 vegetation work plan, what does “outstanding plan” mean? What does “polygon planned work not done” mean?
- j) Some of the numbers from the recent vegetation work plans match up with distribution risk tree miles patrolled and remediated numbers provided in David R. Howell, Exh DRH-1T at 37:1–6, Table No. 6. Do the vegetation work plans provided only cover distribution miles (and not transmission miles)?
- k) Some of the numbers from the recent vegetation work plans match up with distribution risk tree miles patrolled and remediated numbers provided in David R. Howell, Exh DRH-1T at 37:1–6, Table No. 6. Does “miles patrolled” have the same meaning as “miles planned” in the vegetation work plans? Does “miles remediated” have the same meaning as “miles completed” in the vegetation work plans? If no, please explain how the definitions of these terms differ.
- l) Can a planned polygon that has 100 percent “Miles Planned” and 100 percent “Miles Completed” require no remediation action? If yes, please explain why that could be the case.

RESPONSE:

a) Avista uses the terms planned and inspected interchangeably. Work planner and inspector are also synonymous. The Miles Planned field in the vegetation work plans provided in response to Public Counsel Data Request No. 182 is a calculation of the known mileage of overhead lines within a polygon multiplied by the percentage of the polygon that has been planned/inspected. The miles planned field is a way of tracking and reporting when planning/inspection of a polygon is complete and ready for

assignment to a tree crew for execution of the planned work. The selection and prioritization process for identifying vegetation polygons for annual work plans (routine and risk).

b) Miles Completed is also a calculated value that equates to the known overhead line mileage within a polygon multiplied by the percentage of planned work completed within that polygon. Completion of planned work means executing the plan (trimming, removing, replacing) to the Company's specifications.

c) Between 2017 and 2018 planning was changed from circuit level to polygon level. Polygons contain many circuits. The method essentially stayed the same, however. Prior to switching to the polygon method described above in a. and b., the overhead line mileage of a circuit was multiplied by the percentage of the circuit planned/inspected to arrive at Miles Planned and the percentage of the work on the circuit completed was multiplied by overhead line mileage to arrive at Miles Completed.

d) DX Work Plan means Distribution Work Plan. DX and TX are abbreviations used by the Company to mean distribution and transmission, respectively.

e) ROW is an abbreviation for right-of-way. The ROW work type means re-clearing/reclaiming the right-of-way with planning and completion of work at the span (from one pole to the next) level as opposed to spot work planned and completed at the individual tree level.

f) HPGPL is an abbreviation for high pressure gas pipeline.

g) Herbicides are used on the right-of-way to control incompatible tall growing species and noxious weeds. In past years there was enough of this work that it was planned and tracked as a distinct project within the annual work plan. For the past several years herbicide applications have primarily consisted of treating the stumps of fast-growing deciduous trees after they are removed to prevent resprouting. These applications are recorded within the same work records as the tree removals which are generally categorized as risk tree work.

h) 2020 was the first year the Company had separate routine maintenance and risk tree programs. The plan year field in the 2020 work plan was a relic of the 5-year (20% per year) routine maintenance plan and did not apply to the prioritization of polygons in the new risk tree program.

i) The term outstanding plan means a still-to-be-completed plan. As inspections are performed plans are created that consist of one or more units of work that need to be performed. Sometimes completion of a plan is delayed due to customer permission, access, inclement weather, etc. The phrase "polygon planned work not done" means that the entire polygon has been planned/inspected but tree work is incomplete. Both phrases appear in the Carryover Notes section of the workplan and are there to keep track of inspections and work that span between two plan years, so that those polygons will be carried into the following year for completion.

j) Yes, the vegetation work plans provided previously are from the distribution vegetation management program only.

k) Yes, miles patrolled and miles planned effectively mean the same thing within the vegetation work plans. The terms "patrol" and "patrolled" are terminology employed in the transmission vegetation management program.

l) A polygon that has 100 percent "Miles Planned" and 100 percent "Miles Completed" requires no further remediation – all tree work has been completed. It is technically possible that an inspection could lead to no work needed at all, but it is not something that's been encountered in practice.