

**BEFORE THE WASHINGTON  
UTILITIES & TRANSPORTATION COMMISSION**

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION,

Complainant,

v.

AVISTA CORPORATION D/B/A/ AVISTA UTILITIES

Respondent.

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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**

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**EXHIBIT AT-22**

Avista's Response to Public Counsel Data Request No. 290, with Attachment A

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:	David James
TYPE:	Data Request	DEPT:	Wildfire Resiliency
REQUEST NO.:	PC – 290	TELEPHONE:	(509) 495-4185
		EMAIL:	dave.james@avistacorp.com

**SUBJECT: RE: Wildfire Plan, refer to David R. Howell, Exh DRH-2.**

**REQUEST:**

Avista's 2022 Wildfire Resiliency Plan does not have a communications section.

- a) Please provide the Company's most recent wildfire communications plan or protocol.
- b) How many customers in Washington are currently subscribed to email updates and text updates? How many Washington customers are not?
- c) If customers are not subscribed to email or text updates, how does the Company reach these customers?

**RESPONSE:**

Avista's Wildfire communications plan is managed through Avista's Corporate Communications so is not included in the Plan but is a separate document, attached to this request.

- a) See PC-DR-290 Attachment A - Avista's Wildfire Communications Plan for 2022.
- b) There are 166,403 Washington customers listed as active email subscribers, and 18,474 Washington customers listed as active SMS/text alert subscribers. A total of 169,983 Washington customers are subscribed to either emails or SMS/text alerts. 81,599 Washington customers are NOT active email subscribers, and 229,528 Washington customers are NOT active SMS/text alert subscribers. A total of 78,019 Washington customers are NOT subscribed to either emails or SMS/text alerts.
- c) We use a multi-channel approach, including information in our newsletter, which is included in customer bills that are mailed, as well as Avista's website. We can utilize a call out with Interactive Voice Response (IVR) from customer service. We use Avista's social media channels including Facebook and Twitter, partnerships with the community and local media.

**ATTACHMENT A TO AVIATA'S RESPONSE TO PUBLIC COUNSEL**

**DATA REQUEST NO. 290**

**AVISTA’S WILDFIRE RESILIENCY PLAN**  
**2022 Communications Plan**

**Overview**

In June 2020, Avista launched a comprehensive 10-year Wildfire Resiliency Plan. Initial communications focused on the launch, detailing the main elements of the plan, the work that went into it and how the Company would be rolling it out.

In year two, communications shifted to supporting specific initiatives in the plan, partnering with DNR to promote its preparedness outreach in communities and educating customers on Avista’s wildfire resiliency efforts.

The 2022 communications plan builds on the 2020 and 2021 Wildfire Resiliency communications plans. The scope of this plan is broad communications to customers about Avista’s wildfire resiliency work and direct customer communications regarding work or events that may impact them. It does not include communication between Avista staff and first responders or community outreach led by the Regional Business Manager or Wildfire Resiliency Teams.

**Objectives**

As we head into 2022, we are looking to partner with our customers in preparing for and preventing wildfire while also reinforcing our main communications objectives and:

- Build awareness among all key stakeholders of the significant actions and investment Avista is taking to prevent or mitigate the risk of wildfires.
- Instill confidence in Avista as a proactive and responsible corporate citizen.
- Demonstrate Avista’s focus on prioritizing the safety and well-being of its customers and the communities it serves.
- Provide examples of the Wildfire Resiliency Plan in action and show progress as it is implemented.
- Engage customers in programs that impact them and their communities.

The Wildfire Resiliency Plan identified four main components—Grid Hardening, Vegetation Management, Situational Awareness and Operational Readiness. We continue to support each of these elements, highlighting projects in each area as proof points of Avista’s plan in action.

**General Awareness and Customer Preparedness**

- Continue to reinforce key messages of Avista’s Wildfire Resiliency Plan and remind customers of the significant actions and investment Avista is taking.
- Promote wildfire readiness and amplify messages of our partners (DNR, IDL, Firewise, etc.)

Tactic	Timing/Details
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Customer Communication	<ul style="list-style-type: none"> <li>• May - Connect and e-Connect article giving an update on the plan and the season going forward.</li> <li>• May - Customer email with an update on the plan.</li> <li>• May-Aug – Social media posts</li> </ul>
Website	<ul style="list-style-type: none"> <li>• May/June- Update myavista.com/wildfire with information preparedness, new initiatives and more resources.</li> <li>• May – Connect article posted on site</li> </ul>
Internal	<ul style="list-style-type: none"> <li>• May – July – Internal article series updating on elements of the plan.</li> <li>• Information included in all-employee meetings.</li> </ul>
RBM and AE Newsletters	<ul style="list-style-type: none"> <li>• April– Targeted articles to business and community leader audience.</li> </ul>
Advertising	<ul style="list-style-type: none"> <li>• Spring-Summer – Advertising in the WUI areas that focuses on preparedness message to customers.</li> </ul>
Presentations	<ul style="list-style-type: none"> <li>• Update PPT deck created in 2020 with new information for Regional Business Managers.</li> <li>• Support RBM efforts to conduct series of meetings in WUI risk communities</li> </ul>

**Vegetation Management – Right Tree, Right Place, Fuel Reduction**

- As part of Avista’s Wildfire Resiliency Plan, Avista is elevating its approach to vegetation management, particularly in targeted, high risk geographic areas, to further reduce the risk of trees making contact with electrical lines.
- Electric customers in high risk areas (WUI Tier 2-3) may be eligible for a program where Avista will remove and replace incompatible trees with low growing, compatible species. A list of those customers is currently in development.

<b>Tactic</b>	<b>Timing/Details</b>
Customer Communication	<ul style="list-style-type: none"> <li>• Feb - Targeted outreach to customers identified who qualify in Shoshone area for pilot program.</li> <li>• Additional follow-up outreach from program.</li> <li>• Include veg management video in all-customer email in May.</li> </ul>
Website	<ul style="list-style-type: none"> <li>• Update on Right Tree, Right Place webpages, TBD</li> <li>• Add Transmission veg management video to website</li> </ul>

Avista-Owned Channels	<ul style="list-style-type: none"> <li>• Success stories from pilot program shared on Connect blog, possible Connections article, social media posts.</li> </ul>
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**Operational Awareness – Next Generation Dry Land Mode**

- Avista has traditionally alerted all customers when we enter Dry Land Mode, explaining that they may experience longer outages during this time period. An email and press release were sent after operations declares Dry Land Mode.
- Operations has identified different levels of Dry Land Mode—Basic DLM, Elevated DLM and Extreme DLM.
  - Base Level DLM – during fire season, specific circuits, selected based upon potential fire risk, are reconfigured to allow a single automatic reclose. Fault energy varies from 10-55%.
  - Elevated – based on fire-weather conditions, individual circuits, are reconfigured to retain a single reclose attempt but prevents fuses from blowing. Fault energy varies from 10-20%.
  - Extreme – based on fire-weather conditions, individual circuits are reconfigured to eliminate automatic reclosing. Fault energy fixed at 10%.
- As the modes progress, the likelihood of longer outages increases, if a fault were to occur. None of the options include preemptively deenergizing lines as is traditionally understood a Public Safety Power Shutoffs (PSPS). We may turn off lines in an event where emergency responders have requested.
- Additional tactics may be identified and implemented as needed.

Tactic	Timing/Details
Customer Communication	<ul style="list-style-type: none"> <li>• Targeted communication to customers on specific feeders that are impacted. Some will have a message similar to previous years while others will be more specific with preparedness messages.</li> <li>• More messaging needs to be developed along with process—How is it initiated, what gets sent to customers and through what channels (e.g. email, IVR)</li> <li>• Notify customers if impacted by active event and Avista has been asked to turn off power for the safety of emergency responders. (Email, IVR)</li> </ul>
Press release	<ul style="list-style-type: none"> <li>• Announcing the start of Dry Land Mode operations with updated changes. Likely July but depends on weather.</li> </ul>
Internal	<ul style="list-style-type: none"> <li>• Tabletop exercise to prepare for Elevated and Extreme modes of operation in May.</li> </ul>

<p>Additional tactics</p>	<ul style="list-style-type: none"> <li>• As changes take shape, other outreach might be necessary to explain new DLM operations. Support community outreach Regional Business Manager team is leading.</li> <li>• Visuals possibly developed to explain each level. Will need lead time from creative agency to create.</li> </ul>
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**Grid Hardening**

- As grid hardening projects continue throughout our service territory, we are working with that team to notify customers who will be impacted by the work and reinforce why we are doing it.
- Grid hardening projects offer a tangible example of how Avista is investing in its wildfire plan.

Tactic	Timing/Details
Customer Communication	<ul style="list-style-type: none"> <li>• March – December, Postcards alerting customers of work that is happening in their area. To be mailed within two weeks of work for each project.</li> </ul>
Earned Media	<ul style="list-style-type: none"> <li>• As appropriate, actively pitch media stories about grid hardening and wildfire resiliency as work happens in an area</li> </ul>
Avista-Owned Channels	<ul style="list-style-type: none"> <li>• As appropriate and available, stories, like wood-to-steel transmission upgrades, can be used on our own channels like Connect, Connections and social media.</li> </ul>