

**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-23

Avista's Response to Public Counsel Data Request No. 304

July 29, 2022

AVISTA CORP.
RESPONSE TO REQUEST FOR INFORMATION

JURISDICTION:	WASHINGTON	DATE PREPARED:	06/17/2022
CASE NO.:	220053/54/210854	WITNESS:	David Howell
REQUESTER:	Public Counsel	RESPONDER:	David James
TYPE:	Data Request	DEPT:	Wildfire Resiliency
REQUEST NO.:	PC – 304	TELEPHONE:	(509) 495-4185
		EMAIL:	dave.james@avistacorp.com

SUBJECT: Wildfire Plan, refer to David R. Howell, Exh. DRH-2 at 11–12, and 21.

REQUEST:

Avista’s 2022 Wildfire Resiliency Plan shows that the Company failed to meet some 2021 targets for key wildfire metrics such as, distribution grid miles hardened (see Figure 2 at 11), transmission steel poles converted (see Figure 3 at 12), and DLM circuit recloser replacements (Figure 9 at 21). Please explain why Avista failed to meet its 2021 targets and include supporting documentation.

RESPONSE:

All work projections are subject to some level of uncertainty, especially in current times. Projects are delayed due to inadequate crew resources, weather conditions, and, significantly, supply issues. These issues have impacted Avista as they have across most businesses.

As described in the 2021 Year End Report (David R. Howell, Exh. DRH-3 page 6), the grid hardening effort was slowed during the first quarter of 2021 due to limited contract crew availability. Crews were in short supply across the state after a winter windstorm went through in January and February, leading to an Emergency Proclamation by the Governor¹ and creating significant damage for utilities statewide.² This created a significant demand for crews to repair the system, delaying some more routine projects, such a grid hardening, and impacting our expected schedule.

Also, in the 2021 Year End Report (David R. Howell, Exh. DRH-3 page 4), we described why the transmission steel pole conversion 2021 target was not met. This was a combination of two primary factors. Again, crew availability due to winter storms, especially on the west side of the state, impacted schedules, but as described, the primary issue was inclusion of condition-based steel replacements in the projection in addition to those dictated by the Wildfire Plan. This discrepancy was corrected in the 2022 projections.

The DLM circuit recloser replacement schedule delay differs somewhat from the issues affecting the distribution and transmission projects. In this case, Avista was creating new protective relay settings (the dynamic DLM settings) for the first time. This was a brand-new philosophy and approach to operating our protective devices. The Protection Engineering department spent months creating and testing the settings and believed that they would respond as expected during fault scenarios in the field. Unfortunately, when the devices were commissioned in Q2 and Q3 2021, the settings ended up having a small issue that we discovered in late summer that required correcting. This was only found after 65 of the devices were commissioned and in-service with the new settings. The Protection Engineering group then paused the

¹ https://www.governor.wa.gov/sites/default/files/proclamations/22-01%20-%20Winter%20Weather%20and%20Flooding.pdf?utm_medium=email&utm_source=govdelivery

² “Northwest Storm Leaves Hundreds of Thousands Without Power,” Oregon Public Broadcasting, February 14, 2021, <https://www.opb.org/article/2021/02/14/northwest-storm-leaves-hundreds-of-thousands-without-power/>

commissioning of any new devices until they could investigate and remedy the issue. They spent the next few months working on the fix, which didn't get fully resolved until around Q4 2021. Only after the settings were fixed could Avista then re-commission all 100 devices, thus the planned implementation schedule was delayed. To add to this, Avista's Relay Shop was hit with some resource issues that further delayed the completion of devices. This was largely due to COVID, which limited the resources that were available to address our work while also addressing the other critical work the department was responsible for completing.

Please note, these delays in planned capital transferred to plant through the end of 2022 were reflected in the Company's filed case for Rate Year 1 net plant. In addition, Wildfire capital additions in 2022 and beyond will be subject to the Capital Reporting Review process required for all provisional capital additions.