

**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-25**

Avista's Response to Public Counsel Data Request No. 307

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 – 307	TELEPHONE:	(509) 495-4185
		EMAIL:	dave.james@avistacorp.com

**SUBJECT: Wildfire Plan, refer to David R. Howell, Exh. DRH-2 at 24.**

**REQUEST:**

Avista states, “Avista tracks data related to fire-related performance such as number of acres impacted by fires together with data related to fire impact such as number of transmission and distribution structures damaged during fires.” Please provide the Company’s tracked fire-related performance data for each of the past three years in Excel format.

**RESPONSE:**

Avista uses state and national professional fire organization data to track fires, as their information is accurate and verified. For Washington State, the Department of Natural Resources (DNR) is the largest fire department, responsible for over 13 million acres of both private and state-owned land. The DNR is connected directly with the Northwest Interagency Coordination Center (NICC) and the National Interagency Fire Center (NIFC).<sup>1</sup> The attached spreadsheet (PC-DR-307 Attachment A) indicates the number of fires, acres burned, causes, and applicable agency in Washington state for the period requested, as well as the link to this information in the tab labeled “NIFC WA Fires.” This information, as shown, was obtained from these official sources.

Also included in the spreadsheet is a tab for Transmission-related fire events indicating the number of transmission structures impacted by fire from 2019-2021, a total of 308 poles which were subsequently replaced. The largest fire was the one on the Chelan-Stratford line. Fire damage to this transmission line was a result of the Cold Springs Canyon/Pearl Hill fire in September 2020 and resulted in capital replacement costs of over \$8.5 million. This fire was caused by a campfire on private property that had not been properly extinguished.<sup>2</sup>

The third tab on the spreadsheet is for Distribution. These 30 events were derived from the Company’s Outage Management System (OMS). As mentioned in previous testimony, 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, etc. Fire is listed as an outage category, but most often relates to structure fires and is not typically associated with Avista equipment. The OMS was designed to record actual events based upon cause, not impact, with the goal of repairing or replacing equipment that has or could lead to an outage. Currently we can use the OMS dataset to capture spark-ignition and fire events by searching the text strings of Dispatcher comments, which was done in this case. It is important to note that the Wildfire Plan does not focus on replacement of distribution infrastructure to protect it against wildfire damage as we do with transmission. Rather, the focus of Distribution Wildfire Plan programs related to distribution, as described in prior testimony, is to reduce

<sup>1</sup> Coordinating agencies in this group for Washington State include: Bureau of Land Management, US Forest Service, Oregon Dept of Forestry, US Fish and Wildlife Service, Bureau of Indian Affairs, Washington Dept. of Natural Resources and the National Park Service.

<sup>2</sup> <https://wildfirepartners.org/cold-springs-fire/>

spark potential by grid hardening measures such as identifying and mitigating risk trees, replacing obsolete equipment, installing wildfire guards, and replacing wood crossarms with fiberglass.