

**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-8**

Avista's Response to Public Counsel Data Request No. 175

July 29, 2022

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

JURISDICTION:	WASHINGTON	DATE PREPARED:	04/21/2022
CASE NO.:	UE-220053 & UG-220054	WITNESS:	David Howell
REQUESTER:	Public Counsel	RESPONDER:	David James
TYPE:	Data Request	DEPT:	Wildfire Resiliency
REQUEST NO.:	PC – 175	TELEPHONE:	(509) 495-4185
		EMAIL:	dave.james@avistacorp.com

**SUBJECT: Wildfire Plan**  
**David R. Howell, Exh. DRH-1T.**

**REQUEST:**

Avista uses the following terms in the testimony of David Howell – “spark event,” “fire ignition event,” and “spark ignition.”

- a) Please explain what, to Avista, constitutes a “spark event,” “fire ignition event,” and “spark ignition event.”
- b) How do the terms “spark event,” “fire ignition event,” and “spark ignition event” differ in their meaning?
- c) How have “spark events,” “fire ignition events,” and “spark ignition events,” been reported and tracked over time?
- d) Have the definitions, reporting, and tracking of “spark event,” “fire ignition event,” and “spark ignition event” been consistent over the past 12-years?

**RESPONSE:**

- a) 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. Energy release is associated with electric arcing and may cause fire ignition.
- b) See response a) above.
- c) Spark, fire ignition, and spark ignition events have not been specifically tracked over time. The Company has not explicitly tracked wildfires in the past because our current outage management data is based upon cause, not impact, with the goal of repairing or replacing equipment that has caused or could cause an outage. Avista’s Outage Management System (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 generally relates to structure fires and is not typically associated with Avista equipment. This situation is noted when Avista crews are dispatched to disconnect a meter after a fire or to de-energize to protect fire crews. Currently fire information must be obtained by looking through the dispatcher comments in the OMS. This will be the methodology used until we replace our outage management system within the next few years.
- d) No, as these events have been captured in Dispatcher comments which may be inconsistent.