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-9

Avista's Response to Public Counsel Data Request No. 176

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

SUBJECT: Wildfire Plan
Howell, Exh DRH-1T at 7:21.

REQUEST:
Avista states that its Wildfire Resiliency Plan ("Wildfire Plan" or "the Plan") was developed as a risk-based approach to mitigating wildfires.

a) Please list all the risks Avista considered when creating its Wildfire Plan.
b) Please explain in detail what Avista means by "mitigating wildfires" and how the Wildfire Plan will mitigate wildfires.
c) Did Avista assess the risk of company infrastructure causing a wildfire? If the answer is yes, how did Avista assess this risk? If the answer is no, please provide a detailed explanation as to why the Company did not conduct this assessment.
d) In developing a risk-based approach to mitigating wildfires, does Avista differentiate between the risk of wildfires burning utility infrastructure and the risk of Avista infrastructure causing a fire?
e) Please confirm that specific actions undertaken to reduce the risk of wildfire damage to utility infrastructure and actions undertaken to reduce the risk of utility-caused wildfires are distinct. If the answer is yes, please distinguish which specific actions are taken for reducing the risk of wildfire damage to utility infrastructure versus actions undertaken to reduce the risk of utility-caused wildfires.

RESPONSE:

a) The goal of wildfire resiliency is to reduce the overall risk associated with wildfires. As described in the Plan, risks include public and employee safety, customer service reliability, financial risk to the Company and its shareholders, loss of or damage to infrastructure and potential third-party claims for damages. Fire threat risk is also categorized geographical via the Wildland Urban Interface (WUI) map which considers fuel concentration, housing density, and infrastructure data to yield a fire risk rating of 0 to 3. This is the same rating scale used by California IOUs and other public utilities. Precise identification of the risk-cost for any given year is not realistic, and for wildfires, there is a significant difference between small fire events which can occur many times per season versus a large-scale event which may occur once every few years.
b) "Mitigating" wildfires to Avista means developing strategies to reduce the chances of a utility-caused wildfire as well as protecting the infrastructure from the impacts of wildfire. Avista's Wildfire Resiliency Plan is focused on mitigating the risk of wildfires primarily in three areas: protecting lives and property, ensuring emergency preparedness and aligning operations with fire threat conditions, and protecting Avista's energy delivery infrastructure. The recommendations in the Wildfire Plan are based on the ability to reduce the risks associated with public and worker safety, the risks to property and infrastructure, to lessen the impact of electric system outages, and reduce the number of potential utility-caused wildfires. It is impossible to prevent all tree contacts or equipment failures associated with the electric delivery system. However, by adding defense

strategies specifically designed to reduce spark-ignition sources, Avista believes that its Wildfire Resiliency Plan represents a holistic approach to mitigating wildfire risk using the current best practices in the industry: grid hardening, enhanced vegetation management practices, improving situational awareness and response.

c) Yes, in 2019 Avista developed a Wildland Urban Interface map and a financial risk model. A risk report was generated, and that publication has been previously filed with the Commission. In 2020, Avista developed a weather influenced risk monitor which combines the National Weather Service 7-day forecast with performance and condition metrics of electric distribution lines. This model informs our Dry Land operations and helps us identify elevated or extreme fire risk.

d) Yes, frankly the risk to infrastructure is financially contained and well below insurance limits. However, the financial risks associated with starting a fire can be substantial and is proving out in California for the Paradise Fire, the Woolsey Fire, and others that have had significant impact to public safety and private property.

e) Yes, there are differences in actions undertaken to protect infrastructure and to reduce spark potential, although there can be overlap. For example, replacing wood transmission poles with steel reduces the likelihood of pole failure, which can drop conductor to the ground and create a spark, so this program serves both purposes though its primary aim is to make the transmission system resilient to the impacts of wildfires. Distribution grid hardening replaces old equipment that is more likely to fail with the potential to create a spark, but it also strengthens the system. The table below provides a generalized view of the Wildfire programs and their primary focus:

Category	Program	Primary Purpose
Grid Hardening	Distribution Infrastructure Upgrades	Protection
	Converting Wood Transmission Poles to Steel	Resiliency
	Installing Fire Resistant Pole Wraps	Protection
	Enhancing Transmission Inspections	Resiliency
Risk Based Vegetation	100% Annual Risk Tree Inspection	Protection
Management	Transmission LiDAR Imaging	Protection
	Distribution Satellite Imaging	Protection
	Customer Choice Right Tree Right Place	Protection
	Fuel Reduction Partnerships	Protection
Situational Awareness	Dry Land Mode Operations	Protection
	Fire Weather Dashboard	Protection
	Substation SCADA	Protection
	Dry Land Mode Operating Devices	Protection
Operations &	Wildland Urban Interface Maps	Protection
Emergency Response	Emergency First Responder Training	Protection
	Expedited Fire Response	Protection