

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

JURISDICTION:	WASHINGTON	DATE PREPARED:	09/07/2022
CASE NO.:	UE-220053 & UG-220054	WITNESS:	David Howell
REQUESTER:	Public Counsel	RESPONDER:	Liz Andrews
TYPE:	Data Request	DEPT:	Regulatory Affairs
REQUEST NO.:	PC – 359	TELEPHONE:	(509) 495-8601
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SUBJECT: RE: Capital additions

REQUEST:

Refer to Rebuttal Testimony of David R. Howell, Exh. DRH-5T at 5:13–16.

Please provide a specific reference where the Company disclosed the annual information on miles of distribution lines, number of structures, number of substation and other quantities of work activities for years 2021 through 2024 with the related dollar amounts.

RESPONSE:

As noted by Witness Howell, the Company has provided total miles or units over the 10-year plan, however, the specific detailed information of materials and locations of each mile, distribution line, crossarm, etc., to be replaced, upgraded, etc., will be, by necessity, determined as we progress through each year, and will be based on emerging influences for each time period, such as the high fire threat districts per our Wildland Urban Interface (WUI) map and the updated WUI map, annual review of our system and its specific characteristics, and where the work is to occur, related work, annual lessons learned, and other factors. For 2021, Exh. DRH-3 “Wildfire Resiliency 2021 Year End Report”, provided available 2021 information, such as: fiberglass crossarms installed, steel pole replacements, transmission pole wraps, grid hardening miles, enhanced management miles, etc.

Mr. Howell at Exh. DRH-1T Tables 5 and 6 provided 2021 and 2022 (plan) unit and mile info where available. As noted, Exh. DRH-2 provided total amounts on an annual basis over the 10-year plan (see cost forecasting starting at page 9 - 21, including tables and footnotes) and included examples of certain units for 2022 – i.e. 2022 planned mesh wrap units, 2022 Transmission LIDAR miles, 2022 Distribution satellite imaging miles, Dry Land Mode circuit recloser replacement units, etc. Also as noted in response to Public Counsel DR-305, annual balances are provided by capital and O&M category, with PC-DR-305 Attachment A tab “WUI miles” providing WUI planned miles impacting the overall plan by state. Attachment D (column A) provided available unit cost per mile information for the 2022 planning cycle.

In any event, by the very nature of projects that won’t be completed until 2023 and 2024, any uncertainty will be resolved once actual transfers-to-plant occur and made available for the review process which forms an integral part of the Rate Plan, whereby those capital projects are subject to review annually for the prior calendar year, for final prudence and verification of dollars spent and transferred, and a demonstration of used and useful investment.