

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

JURISDICTION:	WASHINGTON	DATE PREPARED:	09/12/2022
CASE NO.:	UE-220053 & UG-220054	WITNESS:	David Howell
REQUESTER:	Public Counsel	RESPONDER:	David James
TYPE:	Data Request	DEPT:	Wildfire/Elec. Operations
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**SUBJECT: Wildfire Plan**

**REQUEST:**

**Rebuttal Testimony of David R. Howell, Exh. DRH-5T at 5:4–7.**

Please answer the following:

- a. Are there 1,100 remaining wood transmission poles that still need to be converted to steel over the course of Avista’s Wildfire Resiliency Plan?
  - i. If yes, how many more years (after the year 2022) does Avista anticipate it will need to accomplish this goal?
  - ii. If no, please provide the number of wood transmission pole that still need to be converted to steel and the number of years (after the year 2022) Avista estimates is will need to accomplish transmission pole replacement.
- b. Please provide the number of actual and planned wood-to-steel transmission pole conversions for each year in 2020-2029.
- c. Howell, Exhibit DRH-2, Avista’s 2022 Wildfire Resiliency Plan indicates that Avista is planning on converting 852 wood transmission poles to steel in 2022. What is the basis for maintaining an annual transmission steel pole conversion budget that is equivalent to about 852 transmission pole replacements annually for the remainder of Avista’s 10-year Wildfire Resiliency Plan? Please providing any supporting calculations or workpapers with the explanation.

**RESPONSE:**

- a. No. The values listed in Howell Rebuttal testimony DRH-5T Page 5, lines 4-7 are inclusive of the Wildfire Resiliency Program from 2020 through 2029 and include projects both in Washington and Idaho. Testimony from that section includes the statement, “This work includes nearly 3,000 of 7,650 miles of distribution lines, converting 1,100 wood transmission structures to tubular steel, and automating nearly 140 substation and distribution line circuit breakers”. In 2021 and 2022, Avista converted 271 transmission structures involving 313 poles as part of Wildfire Resiliency. *Transmission structures may contain 1-3 poles.* The following table indicates the specific breakdown of structures and poles converted since the project started in 2020.

<b>Year</b>	<b>Transmission</b>	<b># Structures</b>	<b># Poles</b>
2021	Addy-Devil's Gap 115 kV	37	75
2021	Addy-Gifford 115 kV	121	124
2022	Addy-Gifford 115 kV	113	114
<b>Totals</b>		<b>271</b>	<b>313</b>

- ii. Of the 1,100 transmission structures slated for conversion from wood to steel, 1,073 structures remain. They will be addressed in the 2023-2029 construction period.
  
- b. Transmission Engineering has developed a project scoping document for the 2023 construction season. Several projects are identified in the Devil's Gap Substation area which is an integration point for the Little Falls and Long Lake hydroelectric projects. 81 structures are slated for conversion from wood to steel in 2023. This leaves 992 structures remaining for the period 2024-2029.
  
- c. In Howell's testimony, he stated that "about 852 transmission poles" were planned for replacement in 2022. This value is inclusive of all planned replacements identified by Transmission Engineering and includes replacements as part of condition rebuild programs, capacity upgrade projects, as well as Wildfire Resiliency. Steel conversion metrics attributable solely to Wildfire Resiliency are noted above in parts a and b.