

**BEFORE THE WASHINGTON
UTILITIES & TRANSPORTATION COMMISSION**

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION,

Complainant,

v.

AVISTA CORPORATION d/b/a AVISTA UTILITIES,

Respondent.

DOCKET NOS. UE-200900 and UG-200901 (*Consolidated*)

PAUL J. ALVAREZ AND DENNIS STEPHENS
ON BEHALF OF THE
WASHINGTON STATE OFFICE OF THE ATTORNEY GENERAL
PUBLIC COUNSEL UNIT

EXHIBIT PADS-29

Avista Response to Public Counsel Data Request No. 292

April 21, 2021

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

JURISDICTION:	WASHINGTON	DATE PREPARED:	04/02/2021
CASE NO.:	UE-200900 & UG-200901	WITNESS:	Heather Rosentrater
REQUESTER:	Public Counsel	RESPONDER:	Kyle Jonas
TYPE:	Data Request	DEPT:	Asset Maintenance
REQUEST NO.:	PC – 292	TELEPHONE:	(509) 495-2695
		EMAIL:	kyle.jonas@avistacorp.com

SUBJECT: Electric Distribution Grid Modernization

REQUEST:

Refer to Avista's revised response to Public Counsel Data Request 223, and in particular to footnote 1 on page 2. Refer also to Figure 23 in the June, 2017 Electric Distribution Plan provided by Avista in response to Public Counsel Data Request 105.

- a) Provide a count of A.B. Chance cutouts referenced in this footnote that Avista currently has in operation on its system.
- b) Of the cutouts shown to have failed in Figure 23 in the June, 2017 Electric Distribution Plan, provide the number which are A.B. Chance cutouts of the type referenced in footnote 1.
- c) Provide a count of cutouts Avista has prospectively replaced by year from 2016 through 2020.
- d) Provide a count of A.B. Chance cutouts of the type referenced in footnote 1 Avista has replaced by year from 2016 through 2020.

RESPONSE:

- a) Although the number remaining is very small, there are a few noted as failing in service and being replaced in recent years. This small number remaining is the result of not all electric distribution infrastructure having been systematically inspected, storm damaged, rebuilt, or otherwise 'touched' by field crews during the period of time when the Company has focused on removing Chance cutouts from service. The cutouts failing in service now still demonstrate their tendency for premature failures compared with the expected life of replacement equipment.
- b) From the total cutout failures represented the subject Chance cutouts represent approximately 97.6% of those failures.
- c) Please see the Company's response in PC-DR-288, and elsewhere, regarding Public Counsel's misleading use of the phrase 'prospectively replaced,' and the available subject information already provided in response to PC-DR-223 Revised.
- d) Please see the cutout failure data already provided in response to PC-DR-229 Attachment A.