

Agenda Date: December 5, 2024

Item Numbers: A1, A2, and A3

Dockets: UE-240836 – Avista Corporation d/b/a Avista Utilities
UE-240831 – PacifiCorp d/b/a Pacific Power & Light Company
UE-240832 – Puget Sound Energy

Staff: Laura Henry, Regulatory Analyst
David Panco, Regulatory Analyst
Debbie Johnson, Regulatory Analyst

Recommendation

Confirm the electric utility Wildfire Mitigation Plans meet statutory requirements as submitted in Dockets UE-240836, UE-240831, and UE-240832.

Background on Electric Utility Wildfire Mitigation Plans

Avista Corporation d/b/a Avista Utilities (Avista), PacifiCorp d/b/a Pacific Power & Light Company (PacifiCorp), and Puget Sound Energy (PSE), jointly (Companies) submitted to the Washington Utilities and Transportation Commission (Commission) Wildfire Mitigation Plans (Plans) in response to requirements of recently enacted RCW 80.28.440.¹

RCW 80.28.440 requires investor-owned utilities to review and revise, as needed, their Plans and submit them to the Commission for review beginning on October 31, 2024. The Commission will confirm if the Plans contain the recommended elements.

As set forth in RCW 76.04.185, the Plans must include acknowledgement that utilities have varying topography, population, and vegetation in their service areas and the Plans must be designed to fit site-specific circumstances. The Plans must also include:

- Vegetation management;
- Infrastructure inspection and maintenance;
- Modifications or updates to facilities to minimize fire risk;
- Preventative programs;
- Operational Procedures; and
- Communication plans for addressing wildfire safety and risk mitigation.

The Companies have presented and reviewed wildfire mitigation plans and results with the Commission in public meetings in conjunction with Docket U-210254 since May 2021.

¹ HB 1032, effective July 23, 2023.

Discussion

The Companies timely filed each of the Plans. Commission Staff (Staff) reviewed the Plans with representatives of each of the Companies and found each of the Plans to be in accordance with statutory requirements.

UE-240831 – PacifiCorp d/b/a Pacific Power & Light Company

Pacific Power provides electricity to approximately 140,000 customers via 33 substations, 4,074 overhead transmission and distribution line miles, and 796 underground line miles across nearly 2,731 square miles in Washington. Many of Pacific Power's wildfire mitigation efforts are focused in the defined geographic area of heightened wildfire risk. The company's wildfire mitigation strategies include:

- Implementation of risk modeling tools, datasets, and software.
- Installation of five new weather stations.
- Continued implementation of increased asset inspections, enhanced asset inspections, and accelerated condition correction.
- Continued transition to a three-year vegetation management cycle for overhead distribution.
- Rebuilding of overhead lines with covered conductor, upgrading of reclosers for enhanced functionality, execution of two public engagement forums and public safety partner meetings and workshops.

Pacific Power's filed Plan complies with statutory requirements in RCW 80.28.440.

UE-240832 – Puget Sound Energy

PSE's Plan WMP is comprised of four core elements: Situational Awareness, Grid Hardening, Operational Procedures, and Communications and Outreach. Improvements were made in several areas:

- Installation of 20 new weather stations and six panoramic cameras. PSE held multiple trainings on these new additions.
- Increased pre-season inspections for distribution and transmission lines. These increased inspections allowed the Company to find and address potential issues such as transformer and pole replacements.
- Increased the number of employee and public safety training, along with awareness campaigns.
- Additional emergency preparedness procedures detail protocols for planned coordination with local jurisdictions and neighboring utilities.

Puget Sound Energy's filed Plan complies with statutory requirements in RCW 80.28.440.

UE-240836 – Avista Corporation d/b/a Avista Utilities

Avista's filed Plan complies with RCW 80.28.440 in format and content. Avista's wildfire resiliency programs are grouped into Grid Hardening, Vegetation Management, Situational Awareness and Emergency Response and Operations, according to a template by the Department of Natural Resources. The Plan cites and adheres to applicable American National Standards Institute criteria, Federal Energy Regulatory Commission reliability standards, and North American Energy Reliability Corporation standards. Both this plan and Avista's previous 2023 Wildfire Resiliency Plan submitted for Avista's GRC are based upon a single operational plan, according to Avista, which undergoes yearly updates.

Avista's submitted plan highlights:

- An Emergency Operations Plan detailing Avista's training and protocols for planned coordination efforts with local police and fire and state and federal authorities under Incident Response Organization.
- Technological upgrades for monitoring and fire risk prediction, such as the application of LiDAR (Light Detection and Ranging), to transmission systems inspections and other digital data strategies.

In a meeting with Staff, Avista described additional procedures in development for fire risk and emergency operations at interconnection points. Avista will consult with the connected utility before a Public Safety Power Shutoff (PSPS) involving such points and execute a joint plan.

Avista experienced its first PSPS on September 29, 2024, affecting 1,500 Spokane residents for approximately 7 hours due to heightened wind and dry conditions. Over the year, Avista reports that the number of outages caused by either vegetation or weather decreased on distribution and transmission systems between 2022 and 2023. On the distribution side, weather related outages have notably decreased from 3,582 in 2021 to 445 in 2023.

Customer Comments

The Commission has not received public comments on any of these dockets as of November 22, 2024.

Conclusion

Staff therefore recommends the Commission confirm the Wildfire Mitigation Plans submitted in Dockets UE-240836, UE-240831, and UE-240832 meet statutory requirements.