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-15

Avista's Response to Public Counsel Data Request No. 208,
With Attachments A and F

July 29, 2022

AVISTA CORP.
RESPONSE TO REQUEST FOR INFORMATION

JURISDICTION:	WASHINGTON	DATE PREPARED:	05/17/2022
CASE NO.:	UE-220053 & UG-220054	WITNESS:	Justin Baldwin-Bonney
REQUESTER:	Public Counsel	RESPONDER:	K. Schultz / T. Benjamin
TYPE:	Data Request	DEPT:	Regulatory Affairs
REQUEST NO.:	PC – 208	TELEPHONE:	(509) 495-2482
		EMAIL:	kaylene.schultz@avistacorp.com

SUBJECT: Capital Additions 2021, TY1 and TY2

REQUEST:
RE: Capital Additions 2021, TY1 and TY2, Justin A. Baldwin-Bonney, Exh JBB-3 at 1–4.
For each programmatic project or program of $1.0 million or greater in 2021 that repeats annually, please provide the following information in Excel:

a. Expand the schedules to include historical amounts spent in each year 2018 through 2021.

b. Provide the average amount spent for the three years 2018–2020 and the variance amount and percent against the 2021 actual amount.

c. Explain any variance of 10 percent or greater and provide the amount related to each reason for the variance.

d. Provide the number of units, quantities, or other data supporting the capital additions for each year 2018 through 2021

RESPONSE:

a. Please see PC-DR-208 Attachment A for transfers-to-plant (TTP) on a system basis by Business Case as contained in Exh. JBB-3 for the period of 2018-2024 (actuals for 2018-2021, forecasted for 2022-2024). The Colstrip 3 & 4 Capital Projects Business Case is not included in this analysis. Please see Staff-DR-123 for more information regarding Colstrip.
b. The average of TTP for the three years 2018-2020 can be derived by Public Counsel from the data provided in PC-DR-208 Attachment A. Please note, the Company bases its determination of rate base included in this case off TTP (when the Business Case is or intended to be in-service and used and useful), rather than spend.
c. As noted in part b above, calculating the variance on a dollar and percent basis between a 3-year average of 2018-2020 and the 2021 actual amount on a system basis can be done by Public Counsel by using the data as provided in PC-DR-208 Attachment A. If more particular information on variances is requested for a specific Business Case or set of Business Cases among the list of Business Cases (134 Business Cases in total over the period 2021-2024) in PC-DR-208 Attachment A for the years provided, please advise.
d. Please refer to the Business Cases for supporting documentation. Please note, the Business Case generally includes spend, and as mentioned in part b. above, the Company uses TTP as the basis for determining rate recovery. Please see the associated Business Case located in one of the following: Exh. JRT-4, Exh. HLR-2, Exh. JMK-2, Exh. KEM-2, Exh. SJK-2, and Exh. DRH-4. Mr. Baldwin-Bonney's Exh. JBB-3 provides a listing of the Business Cases by name and includes a reference to the capital witness's testimony that sponsors the Business Case. Please also refer to Staff-DR-121

Attachment A for references, including page numbers, to the related testimony and Business Case exhibits by Business Case included in this case.

Business cases that support capital additions for 2018-2020 (actual TTP that was deemed prudent and in-service, per Final Order 08 / 05) were previously provided in Dockets UE-200900, UG-200901 and UE-200894 *(consolidated)* have been provided as the following attachments:

- PC-DR-208 Attachment B (previously Exh. JRT-6 in Dockets UE-200900, UG-200901 and UE-200894 *(consolidated))*
- PC-DR-208 Attachment C (previously Exh. HLR-11 in Dockets UE-200900, UG-200901 and UE-200894 *(consolidated))*
- PC-DR-208 Attachment D (previously Exh. JMK-3 in Dockets UE-200900, UG-200901 and UE-200894 *(consolidated))*
- PC-DR-208 Attachment E (previously Exh. KEM-2 in Dockets UE-200900, UG-200901 and UE-200894 *(consolidated))*
- PC-DR-208 Attachment F (previously Exh. DRH-7 in Dockets UE-200900, UG-200901 and UE-200894 *(consolidated))*

ATTACHMENT A TO AVIATA'S RESPONSE TO PUBLIC COUNSEL

DATA REQUEST NO. 208

PC-DR-208 Attachment A
System Transfers to Plant (TTP) by Business Case (including 2021 Budgeted TTP)

		Actual TTP				Forecasted TTP			
Business Case	**Reoccurring? [2]**	**2018 Actual TTP (System)**	**2019 Actual TTP (System)**	**2020 Actual TTP (System)**	**2021 Actual TTP (System)**	**2022 Forecasted TTP (System)**	**2023 Forecasted TTP (System)**	**2024 Forecasted TTP (System)**	**2021 Budgeted TTP (System)**
Apprentice/Craft Training	N	$ 136,695	$ 1,890	$ 43,920	$ 45,004	$ -	$ -	$ -	$ 61,677
Atlas	Y	$ 2,242,717	$ 399,255	$ 2,339,714	$ 2,756,260	$ 1,452,641	$ 2,948,867	$ 2,119,113	$ 2,131,345
Automation Replacement	Y	$ 1,231,420	$ 319,503	$ 405,105	$ 649,170	$ 349,999	$ 349,999	$ 600,000	$ 419,000
Base Load Hydro	Y	$ 943,795	$ 748,288	$ 800,907	$ 369,768	$ 958,925	$ 963,504	$ 963,504	$ 1,025,004
Base Load Thermal Program	Y	$ 2,218,870	$ 2,305,760	$ 2,222,952	$ 2,454,389	$ 2,484,254	$ 2,693,105	$ 2,623,988	$ 2,764,186
Basic Workplace Technology Delivery	Y	$ -	$ 241	$ 1,277,200	$ 1,172,274	$ 813,479	$ 800,005	$ 800,003	$ 440,003
Boulder Park Generator Replacement	N	$ -	$ -	$ -	$ -	$ -	$ -	$ 999,998	$ -
Cabinet Gorge 15 kV Bus Replacement	N	$ -	$ -	$ 396,721	$ 411,049	$ -	$ -	$ -	$ -
Cabinet Gorge Dam Fishway	N	$ -	$ -	$ 54,207	$ (54,207)	$ 63,475,101	$ 235,000	$ -	$ -
Cabinet Gorge HVAC Replacement	N	$ -	$ -	$ -	$ -	$ -	$ 1,500,000	$ -	$ -
Cabinet Gorge Station Service	N	$ -	$ -	$ -	$ -	$ 7,761,859	$ 5,152,936	$ -	$ -
Cabinet Gorge Stop Log Replacement	N	$ -	$ -	$ -	$ -	$ -	$ 1,200,000	$ -	$ -
Cabinet Gorge Unit 3 Protection & Control Upgrade	N	$ -	$ -	$ -	$ 3,073,449	$ -	$ -	$ -	$ 2,818,081
Cabinet Gorge Unit 4 Protection & Control Upgrade	N	$ -	$ -	$ -	$ -	$ 750,000	$ -	$ -	$ 2,831,852
Cabinet Gorge Unwatering Pumps	N	$ -	$ -	$ -	$ -	$ 395,000	$ 395,016	$ -	$ -
Capital Tools & Stores	Y	$ 2,717,260	$ 1,771,563	$ 1,634,823	$ 2,350,482	$ 2,500,008	$ 2,500,008	$ 2,500,008	$ 2,753,832
Central 24 HR Operations Facility	N	$ -	$ -	$ -	$ -	$ -	$ -	$ 4,598,545	$ -
Clark Fork Settlement Agreement	Y	$ 2,076,672	$ 994,801	$ 945,205	$ 2,703,250	$ 4,839,609	$ 5,622,720	$ 3,877,380	$ 6,470,552
Colstrip Transmission	Y	$ 120,892	$ 357,673	$ 385,002	$ 558,300	$ 325,001	$ 370,002	$ 639,999	$ 724,001
Control and Safety Network Infrastructure	N	$ -	$ -	$ -	$ -	$ 1,324,039	$ 1,282,468	$ 1,485,787	$ -
Coyote Springs LTSA	N	$ -	$ 44,858	$ -	$ 15,898,972	$ -	$ -	$ -	$ -
CS2 Single Phase Transformer	N	$ -	$ -	$ 2,847,790	$ 17,052,904	$ -	$ -	$ -	$ 18,800,848
Customer Experience Platform Program [1]	Y	$ -	$ -	$ -	$ 6,540,925	$ 5,999,915	$ 6,300,000	$ 6,300,000	$ 4,338,871
Customer Facing Technology Program	Y	$ 7,432,557	$ 6,950,848	$ 15,868,642	$ 3,465,629	$ 4,078,651	$ 4,699,999	$ 4,700,000	$ 5,253,159
Customer Transactional Systems	Y	$ -	$ -	$ 1,704,621	$ 4,004,370	$ 3,859,166	$ 3,500,000	$ 3,749,987	$ 3,740,591
Data Center Compute and Storage Systems	Y	$ 207,966	$ 2,233,253	$ 1,956,169	$ 2,093,930	$ 1,260,205	$ 2,063,801	$ 1,972,626	$ 495,965
Digital Grid Network	Y	$ 2,470,662	$ 531,567	$ 1,943,211	$ 1,221,333	$ 2,801,323	$ 2,121,419	$ 2,461,518	$ 1,403,703
Distribution Grid Modernization	Y	$ 14,788,545	$ 10,112,822	$ 7,500,912	$ 1,507,018	$ 2,165,010	$ 2,239,852	$ 794,988	$ -
Distribution Minor Rebuild	Y	$ 9,272,528	$ 11,868,879	$ 12,157,855	$ 11,835,053	$ 11,499,986	$ 11,499,986	$ 10,999,980	$ 10,046,229
Distribution System Enhancements	Y	$ 3,685,446	$ 4,853,883	$ 3,731,511	$ 6,102,801	$ 6,930,025	$ 7,069,995	$ 7,000,013	$ 5,999,999
Distribution Transformer Change Out Program	N	$ 2,064,151	$ 995,659	$ 170,931	$ 107,443	$ -	$ -	$ -	$ 399,996
Downtown Network - Asset Condition	Y	$ 2,742,350	$ 1,815,954	$ 1,915,580	$ 1,883,954	$ 1,600,000	$ 1,999,999	$ 2,400,000	$ 1,599,997
Downtown Network - Performance & Capacity	Y	$ 340,338	$ 379,678	$ 1,947,160	$ 670,739	$ 1,100,000	$ 1,150,000	$ 1,200,000	$ 1,717,694
Elec Relocation and Replacement Program	Y	$ 1,573,450	$ 1,693,571	$ 6,503,138	$ 5,183,165	$ 5,399,944	$ 5,399,984	$ 5,399,987	$ 2,751,073
Electric Storm	Y	$ 3,190,440	$ 6,237,565	$ 10,510,175	$ 17,798,754	$ 6,023,406	$ 6,000,012	$ 6,000,012	$ 3,423,275
Electric Transportation	Y	$ -	$ -	$ -	$ 616,426	$ 2,775,000	$ 3,900,000	$ 4,060,000	$ 2,000,253
Endpoint Compute and Productivity Systems	Y	$ 1,033,833	$ 10,919,526	$ 5,056,069	$ 1,657,283	$ 3,498,321	$ 3,416,996	$ 5,681,768	$ 2,877,669
Energy Delivery Modernization & Operational Efficiency	Y	$ -	$ -	$ -	$ 2,183,337	$ 5,560,672	$ 3,449,859	$ 5,789,674	$ 5,462,847
Energy Delivery Operational Efficiency & Shared Services	N	$ 1,973,649	$ 5,187,210	$ 3,300,317	$ 648,749	$ -	$ -	$ -	$ 388,925
Energy Imbalance Market	N	$ -	$ -	$ 2,832,327	$ 10,584,930	$ 12,016,376	$ -	$ -	$ 9,576,711
Energy Imbalance Market Modernization & Operational Efficiency	N	$ -	$ -	$ -	$ -	$ -	$ 499,974	$ 585,791	$ -
Energy Resources Modernization & Operational Efficiency	Y	$ 509,680	$ 895,569	$ 1,823,770	$ 1,550,948	$ 2,727,599	$ 2,679,478	$ 2,695,981	$ 938,827
Enterprise & Control Network Infrastructure [3]	Y	$ 1,307,216	$ 5,021,478	$ 2,838,112	$ 6,049,746	$ 3,243,307	$ -	$ -	$ 6,965,904
Enterprise Business Continuity	Y	$ 257,515	$ (0)	$ -	$ 171,368	$ 93,045	$ 422,064	$ 100,000	$ 302,427
Enterprise Communication Systems	Y	$ 428,669	$ 2,050,011	$ 1,812,954	$ 2,216,341	$ 1,472,733	$ 2,482,488	$ 2,115,997	$ 1,757,065
Enterprise Data Science	N	$ -	$ 1,437,251	$ 1,299,169	$ 21,497	$ -	$ -	$ -	$ -
Enterprise Network Infrastructure	N	$ -	$ -	$ -	$ -	$ 2,235,285	$ 2,341,928	$ 1,544,361	$ -
Enterprise Security	Y	$ 1,037,227	$ 3,816,881	$ 3,886,215	$ 3,113,431	$ 972,340	$ 1,137,498	$ 1,400,499	$ 1,249,414
Environmental Control & Monitoring Systems	Y	$ 100,618	$ 749,778	$ 580,676	$ 670,378	$ 1,123,937	$ 964,347	$ 887,389	$ 1,088,594
ET Modernization & Operational Efficiency - Technology	Y	$ 1,753,393	$ 2,462,107	$ 2,192,326	$ 2,214,553	$ 1,564,548	$ 2,002,429	$ 2,053,458	$ 1,869,211
Facilities and Storage Location Security	Y	$ -	$ 1,009,634	$ 409,092	$ 267,591	$ 210,919	$ 489,088	$ 345,587	$ 246,161
Fiber Network Lease Service Replacement	Y	$ -	$ -	$ 566,168	$ 591,261	$ 1,392,970	$ 1,687,126	$ 1,392,938	$ 2,054,204
Financial & Accounting Technology	Y	$ 1,195,280	$ 3,446,598	$ 395,007	$ 4,537,652	$ 1,788,284	$ 2,775,001	$ 2,150,001	$ 3,514,217
Fleet Services Capital Plan	Y	$ 8,560,627	$ 6,662,890	$ 4,913,208	$ 5,810,999	$ 7,904,640	$ 5,608,016	$ 5,423,704	$ 6,872,893
Gas Above Grade Pipe Remediation Program [3]	Y	$ -	$ -	$ -	$ -	$ 682,000	$ 714,000	$ 709,000	$ -
Gas Airway Heights HP Reinforcement	N	$ -	$ -	$ -	$ -	$ 9,634,502	$ -	$ -	$ 2,999,743
Gas Cathodic Protection Program	Y	$ 311,249	$ 784,320	$ 704,512	$ 325,122	$ 715,000	$ 715,000	$ 715,000	$ 800,500
Gas Cheney HP Reinforcement	N	$ -	$ 3,048,353	$ 4,944,134	$ 2,834,650	$ -	$ -	$ -	$ 3,099,608

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Gas Facility Replacement Program (GFRP) Aldyl A Pipe Replacement	Y	$ 21,914,044	$ 22,002,672	$ 20,857,498	$ 22,430,464	$ 25,687,251	$ 27,687,251	$ 24,444,163	$ 22,832,198
Gas HP Pipeline Remediation Program	N	$ 4,952	$ 0	$ -	$ 702,918	$ 599,998	$ -	$ -	$ 699,752
Gas Isolated Steel Replacement Program	Y	$ 1,416,008	$ 1,459,659	$ 748,884	$ 957,955	$ 862,754	$ 850,008	$ 850,008	$ 1,399,910
Gas Non-Revenue Program	Y	$ 8,811,389	$ 8,173,893	$ 7,166,320	$ 9,831,020	$ 9,295,000	$ 8,500,010	$ 8,500,010	$ 7,999,999
Gas Operator Qualification Compliance	N	$ -	$ 248,710	$ 34,123	$ 28,045	$ -	$ -	$ -	$ 65,074
Gas Overbuilt Pipe Replacement Program	N	$ 85,263	$ 755,731	$ 206,215	$ 158,171	$ -	$ -	$ -	$ 459,747
Gas PMC Program	Y	$ 2,863,796	$ 2,852,374	$ 1,426,939	$ 2,297,030	$ 3,500,004	$ 3,799,993	$ 1,500,000	$ 2,949,736
Gas Pullman HP Reinforcement Project	N	$ -	$ -	$ -	$ -	$ -	$ -	$ 2,400,004	$ -
Gas Regulator Station Replacement Program	Y	$ 1,067,355	$ 996,497	$ 610,389	$ 1,216,306	$ 985,579	$ 1,000,002	$ 799,999	$ 1,462,037
Gas Reinforcement Program	Y	$ 1,767,984	$ 795,172	$ 1,450,851	$ 620,671	$ 1,299,997	$ 1,299,999	$ 1,300,002	$ 1,299,744
Gas Replacement Street and Highway Program	Y	$ 4,704,048	$ 7,592,120	$ 2,888,314	$ 3,120,332	$ 3,495,650	$ 3,500,000	$ 3,500,000	$ 3,418,022
Gas Telemetry Program	Y	$ 214,943	$ 159,810	$ 103,591	$ 155,090	$ 303,256	$ 210,004	$ 210,004	$ 174,438
Gas Transient Voltage Mitigation Program [3]	Y	$ -	$ -	$ -	$ -	$ 875,000	$ 965,000	$ 250,000	$ -
Generation DC Supplied System Update	Y	$ 2,435,491	$ (15,071)	$ 292,079	$ 237,573	$ 550,001	$ 550,001	$ 400,000	$ 249,996
Generation Masonry Building Rehabilitation	N	$ -	$ -	$ -	$ -	$ 493,993	$ 493,995	$ 493,990	$ -
Generation Protection Upgrades	N	$ -	$ -	$ -	$ -	$ -	$ -	$ 587,500	$ -
Generation, Substation & Gas Location Security	Y	$ -	$ -	$ -	$ 2,683,814	$ 332,159	$ 459,001	$ 545,002	$ 483,038
High Voltage Protection (HVP) Refresh	N	$ 163,122	$ 291,477	$ -	$ -	$ 226,712	$ 336,542	$ 190,320	$ 358,075
HMI Control Software	Y	$ 54,541	$ 2,918	$ -	$ 336,041	$ 3,500,000	$ 2,550,000	$ 1,550,000	$ 2,200,000
Human Resources Technology	Y	$ 135,775	$ 120,315	$ 871,690	$ 239,355	$ 499,529	$ 500,002	$ 500,000	$ 699,555
Hydro Safety Minor Blanket	N	$ 242,972	$ -	$ -	$ 40,951	$ -	$ -	$ -	$ 50,004
Identity and Access Governance (IAG) [3]	Y	$ -	$ -	$ -	$ -	$ 672,255	$ 418,119	$ 191,368	$ -
Jackson Prairie Joint Project	Y	$ 2,351,222	$ 2,489,056	$ 2,358,693	$ 2,349,150	$ 2,378,977	$ 2,369,965	$ 2,420,989	$ 2,376,660
Joint Use	Y	$ -	$ -	$ 4,012,728	$ 1,665,814	$ 2,749,992	$ 2,950,008	$ 2,950,008	$ 2,750,002
KF_Fuel Yard Equipment Replacement	N	$ -	$ -	$ -	$ -	$ -	$ 30,367,127	$ -	$ -
Land Mobile Radio & Real Time Communication Systems	Y	$ 180,863	$ 1,040,335	$ 2,396,177	$ 340,231	$ 3,569,746	$ 1,005,328	$ 3,028,940	$ 3,295,261
LED Change-Out Program	Y	$ 1,367,942	$ 676,578	$ 411,488	$ 263,248	$ 299,964	$ 299,964	$ 299,964	$ 399,996
Legal & Compliance Technology	Y	$ 127,413	$ 201,916	$ 517,680	$ 89,026	$ 400,015	$ 413,072	$ 339,598	$ 322,780
Little Falls Plant Upgrade	N	$ 7,892,001	$ 8,953,839	$ 231,373	$ 1,430,408	$ -	$ -	$ -	$ 1,450,889
Long Lake Plant Upgrade	N	$ 3,488,539	$ 733,802	$ 211,786	$ 1,274,252	$ -	$ -	$ 19,541,000	$ 1,330,925
Meter Minor Blanket	N	$ 257,742	$ 198,169	$ 245,518	$ 254,473	$ -	$ -	$ -	$ 249,996
Monroe Street Abandoned Penstock Stabilization	N	$ -	$ -	$ -	$ -	$ -	$ 899,992	$ -	$ -
N Lewiston Autotransformer - Failed Plant	N	$ -	$ -	$ -	$ -	$ 5,554,506	$ -	$ -	$ -
Network Backbone	N	$ -	$ -	$ -	$ -	$ 188,444	$ 3,879,878	$ 3,686,842	$ -
New Revenue - Growth	Y	$ 81,087,056	$ 71,589,173	$ 76,296,316	$ 77,701,938	$ 73,429,598	$ 67,348,997	$ 67,371,967	$ 57,697,286
Nine Mile HED Battery Building	N	$ -	$ -	$ -	$ -	$ 800,001	$ -	$ -	$ -
Nine Mile Powerhouse Crane Rehab	N	$ -	$ -	$ -	$ -	$ 1,699,988	$ -	$ -	$ -
Nine Mile Units 3 & 4 Control Upgrade	N	$ -	$ -	$ -	$ -	$ -	$ 2,000,000	$ 1,999,999	$ -
Noxon Rapids HVAC	N	$ -	$ -	$ -	$ -	$ -	$ -	$ 1,250,002	$ -
Oil Storage Improvements	N	$ -	$ -	$ -	$ -	$ -	$ 1,762,827	$ -	$ -
Outage Management System & Advanced Distribution Management Syste	N	$ -	$ -	$ -	$ -	$ -	$ 10,000,000	$ 15,000,000	$ -
Payment Card Industry Compliance (PCI)	N	$ -	$ 617,112	$ 847,201	$ 597,249	$ -	$ -	$ -	$ -
Peaking Generation Business Case	Y	$ 110,416	$ 322,615	$ 314,540	$ 606,688	$ 445,001	$ 458,000	$ 450,000	$ 450,000
Post Falls Landing and Crane Pad Development	N	$ -	$ -	$ -	$ 3,292,267	$ -	$ -	$ -	$ 3,307,656
Post Falls North Channel Spillway Rehabilitation	N	$ -	$ -	$ -	$ -	$ -	$ -	$ 18,499,999	$ -
Primary URD Cable Replacement	N	$ 637,472	$ 813,805	$ 164,230	$ 35,655	$ -	$ -	$ -	$ -
Protection System Upgrade for PRC-002	N	$ -	$ 1,165,241	$ 0	$ 7,121,962	$ 80,000	$ 11,879,164	$ -	$ -
Regulating Hydro	Y	$ 6,330,403	$ 1,966,017	$ 1,034,433	$ 2,004,462	$ 2,947,845	$ 2,961,000	$ 2,961,000	$ 2,390,000
Saddle Mountain 230/115kV Station (New) Integration Project Phase 1	N	$ 2,554,495	$ 8,943,952	$ 28,852,361	$ 3,490,919	$ -	$ -	$ -	$ -
Saddle Mountain 230/115kV Station (New) Integration Project Phase 2	N	$ -	$ -	$ 1,110,656	$ 11,210,582	$ 19,962,533	$ -	$ -	$ 11,805,060
SCADA - SOO and BuCC	Y	$ 528,722	$ 508,435	$ 1,822,149	$ 1,523,098	$ 1,026,882	$ 736,223	$ 699,972	$ 1,351,728
Security Compliance [3]	Y	$ -	$ -	$ -	$ -	$ 250,001	$ 250,001	$ 244,774	$ -
Spokane River License Implementation	Y	$ 415,863	$ 435,911	$ 1,308,813	$ 746,294	$ 629,226	$ 535,000	$ 492,301	$ 1,659,840
Spokane Smart Circuit	N	$ (2,909)	$ -	$ -	$ 550,569	$ -	$ -	$ -	$ -
Spokane Valley Transmission Reinforcement Project	N	$ -	$ (110)	$ -	$ 13,683,430	$ 2,000,000	$ -	$ -	$ 13,525,820
Strategic Initiatives	N	$ 1,056,725	$ 775,452	$ 10,417,329	$ 6,265,315	$ 2,522,399	$ -	$ -	$ 2,000,000
Structures and Improvements/Furniture	Y	$ 3,216,093	$ 1,558,328	$ 2,162,499	$ 1,574,915	$ 3,639,388	$ 3,349,639	$ 3,349,609	$ 3,551,564
Substation - New Distribution Station Capacity Program	Y	$ 642,886	$ 3,768,440	$ 8,043,164	$ 2,321,014	$ 5,765,300	$ 11,076,449	$ 12,701,549	$ 860,732

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		Actual TTP				Forecasted TTP			
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Substation - Station Rebuilds Program	Y	$ 17,850,286	$ 14,313,860	$ 11,413,390	$ 4,672,935	$ 12,998,326	$ 58,412,186	$ 41,493,604	$ 6,639,082
Technology Failed Assets	Y	$ 1,695	$ 786,634	$ 973,270	$ 533,505	$ 611,563	$ 556,208	$ 556,198	$ 616,980
Technology Refresh to Sustain Business Process	N	$ 8,687,848	$ 3,713,767	$ (2,616)	$ 812,952	$ -	$ -	$ -	$ 562,670
Telematics 2025	N	$ -	$ -	$ -	$ 651,009	$ 438,347	$ 808,250	$ -	$ 1,100,000
Transmission - Minor Rebuild	Y	$ 586,929	$ 3,971,001	$ 1,674,541	$ 4,331,179	$ 3,400,375	$ 3,343,418	$ 3,343,419	$ 3,343,428
Transmission - Performance & Capacity [3]	Y	$ -	$ -	$ -	$ -	$ -	$ -	$ 8,500,000	$ -
Transmission Construction - Compliance	N	$ 10,845,388	$ 5,883,218	$ 9,539,913	$ 2,189,745	$ 2,111,069	$ 1,550,000	$ -	$ 2,100,825
Transmission Major Rebuild - Asset Condition	Y	$ 7,760,684	$ 314,005	$ -	$ 16,128,097	$ 5,680,751	$ 12,000,000	$ 11,000,000	$ 17,900,000
Transmission NERC Low-Risk Priority Lines Mitigation	N	$ 774,519	$ 744,660	$ 5,027,589	$ 327	$ 2,554,255	$ 2,499,984	$ -	$ 1,023,452
Tribal Permits & Settlements	Y	$ 87,307	$ 1,251,484	$ -	$ 43,395	$ 259,776	$ 249,996	$ 249,996	$ -
Upper Falls Trash Rake Replacement	N	$ -	$ -	$ -	$ -	$ -	$ 1,500,000	$ -	$ -
Use Permits	Y	$ -	$ -	$ 126,396	$ 203,901	$ 150,012	$ 150,012	$ 150,012	$ 50,004
Washington Advanced Metering Infrastructure Project	N	$ 33,868,858	$ 52,793,010	$ 28,711,359	$ 2,986,858	$ -	$ -	$ -	$ 6,815,471
Westside 230/115kV Station Brownfield Rebuild Project	N	$ 9,559,989	$ 650,861	$ (634,812)	$ 8,339,334	$ -	$ -	$ 8,924,475	$ -
Wildfire Resiliency Plan	Y	$ -	$ -	$ 3,206,894	$ 18,369,323	$ 24,544,986	$ 27,000,000	$ 29,000,001	$ 17,117,355
Wood Pole Management	Y	$ 10,999,184	$ 10,369,759	$ 10,275,278	$ 14,588,071	$ 12,999,996	$ 12,999,996	$ 12,999,996	$ 15,739,332
WSDOT Control Zone Mitigation	Y	$ -	$ -	$ -	$ 408,317	$ 749,998	$ 1,200,005	$ 1,399,999	$ 999,999
WSDOT Franchises	Y	$ -	$ -	$ 2,531,162	$ 505	$ 99,996	$ 99,996	$ 99,996	$ 237,084

[1] Customer Experience Platform Program includes "Strategic Initiatives" TTP in 2020 & 2021.

[2] For purposes of responding to this data request, the Company has defined reoccurring (programmatic in nature) as business cases that have transfers to plant occurring annually each year from 2021-2024, which is the period of TTP included in this case. In column B "Reoccurring?", "Y" = Yes, reoccurring/programmatic in nature and "N" = No, non-reoccurring (i.e. discreet).
[3] These business cases have started or ended within the period identified as reoccurring; however, for purposes of this data request, are reoccurring in nature.

Please note, the analysis above does not contain TTP information related to the Colstrip Units 3 & 4 business case. See Staff-DR-123 for more information.

ATTACHMENT F TO AVIATA'S RESPONSE TO PUBLIC COUNSEL

DATA REQUEST NO. 208

EXECUTIVE SUMMARY

The threat of wildfires poses a significant risk to utilities across the western United States. In May of 2020, Avista published its "**2020 Wildfire Resiliency Plan**" which details twenty-eight actions to mitigate the risk of wildfire. The Plan includes upgrades to infrastructure aimed at reducing spark-ignition events and protecting critical infrastructure from the threat of wildfires. The Plan details a 10-year time horizon. The $268,965,000 Plan includes investments in the four categories:

Enhanced Vegetation Management
Widen Transmission R/Ws ($5,000,000)
Vegetation management incorporated into CPC designs ($100,000)

Situational Awareness
Fire-Weather Dashboard & TROVE risk analysis ($425,000)
Midline Reclosers Communications ($540,000)
100% Substation SCADA ($17,000,000)

Operations and Emergency Response
Transmission Design Review of Major Events ($100,000)
Fire Ignition Tracking System ($200,000)

Grid Hardening & Dry Land Mode
Transmission Fire Inspection ($3,000,000)
Transmission Grid Hardening ($44,000,000)
Midline Reclosers ($5,400,000)
Distribution Grid Hardening (193,200,000)

Wildfire Plan (CapX 2020-2029) $268,965,000

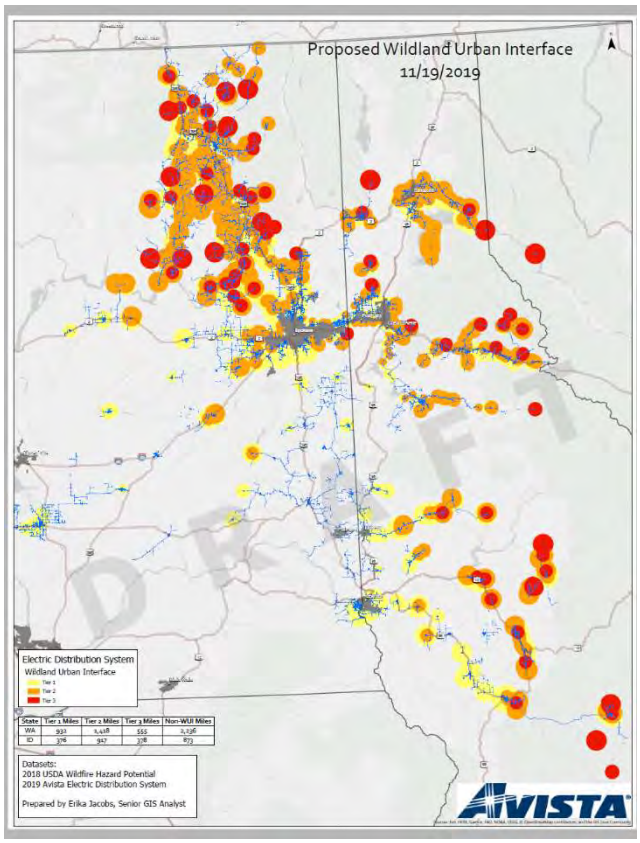
The 10-year accumulated inherent risk of wildfire is estimated between $8.05 and $18.2 billion dollars. The mitigated risk (with controls) is estimated between 0.5 and $2.3 billion dollars. Again, accumulated over a 10-year period. The risk reduction is estimated at between 8X and 16X with a cost – benefit ratio between 22.9 and 48.6 including $60 million dollars of O&M expense.

VERSION HISTORY

Version	Author	Description	Date	Notes
0	David James	Initial Submission to Capital Planning	April 1, 2020	Initial submission
1	David James	Refresh using 2020 BC narrative template	July 29, 2020	No revision to capital requirements

GENERAL INFORMATION

Requested Spend Amount	$268,965,000 (2020-2029) CAPX $59,586,000 (2020-2029 OPX) *for information*
Requesting Organization/Department	Electric Operations
Business Case Owner	David Howell
Business Case Sponsor	Heather Rosentrater
Sponsor Organization/Department	Electric Operations
Category	Program
Driver	Customer Service Quality & Reliability



1. BUSINESS PROBLEM

1.1 What is the current or potential problem that is being addressed? The risk of wildfires is increasing throughout the western United States. Data from the U.S. Forest service indicates a 300% increase in the number of wildfires since 1970 Data specific to fires in Washington and Idaho fires suggest that fire size has increased 400-500% over the last several decades. Though the number of powerline involved wildfires remains relatively low (5-7% WA DNR statistics, 1990-2015), wildfire is differentiated from natural disasters in that 'cause and origin' investigations often lead to claims for fire suppression costs, property damage, timber loss, and personal injury. In the fall of 2018, a small team of Avista employees was assembled to assess the risks, develop defensive strategies, and implement a Wildfire Resiliency Plan. This business case reflects the 10-year strategy to build defense strategies against wildfire.

1.2 Discuss the major drivers of the business case and the benefits to the customer? Wildfire does not align well with the existing business case drivers. Unlike most asset replacement programs, Wildfire Resiliency is a risk-based, not a condition-based program. Therefore, it is best aligned with Customer Service Quality & Reliability and is expected to reduce risk exposure by at least $7.5 billion dollars over a 10-year period.

1.3 Identify why this work is needed now and what risks there are if not approved or is deferred – Avista has published a "2020 Wildfire Resiliency Plan" and have committed to implementation at the highest levels of the Company including the Board of Directors. It is a Tier 1 Enterprise Level risk.

1.4 Identify any measures that can be used to determine whether the investment would successfully deliver on the objectives and address the need listed above – As part of Wildfire Resiliency, performance metrics will be tracked including, fire ignition events, to measure the efficacy of the program. Transmission and Distribution Operations tracks system outages including cause-code, duration, and impacted customers. The primary goal of the program is to limit the number of spark-ignition events and the reduction in outages will enhance customer experience.

1.5 Supplemental Information

1.5.1 Please reference and summarize any studies that support the problem

Several supporting documents are available for review:

2020 Avista Wildfire Resiliency Plan (June 2020)
Wildfire Resiliency Cost Plan (January 2020)
Wildfire Risk Assessment (September 2019)
Wildfire Plan Charter (May 2019)

1.5.2 For asset replacement, include graphical or narrative representation of metrics associated with the current condition of the asset that is proposed for replacement.

Wildfire Resiliency is a comprehensive, risk-based program and includes targeted equipment replacement. Condition based metrics are not considered.

In May and June of 2019, a series of risk workshops were held to identify potential defensive strategies to reduce the risk of wildfire. These workshops were facilitated by the Business

Process Improvement team with support from Senior Risk Manager, Bob Brandkamp, and Asset Management Analyst, Jeff Smith. Over the course of 6-workshops, 160 mitigation strategies were identified. 60 of those were analyzed in detail and ultimately, 28 strategies were adopted into the plan including transmission and distribution grid hardening, a comprehensive review of dry land mode operating strategies, and systems to actively monitor fire-risk. In addition to internal processes, Avista participated in several utility forums sponsored by the Western Energy Institute including the Wildfire Planning & Mitigation workshop. In general, the approach to fire mitigation is consistent throughout the utility sector.

Option	Capital Cost	Start	Complete
Wildfire Resiliency Plan	*$268,965,000*	*07 2020*	*12 2029*

2.1 Describe what metrics, data, analysis or information was considered when preparing this capital request.

Wildfire Resiliency is a risk-based plan. Inherent (existing) and mitigated (future) risks were assessed in three categories:

- Financial (the cost of replacing T&D infrastructure associated with wildfire events and response to third party and other claims for fire suppression and damages)
- Customer (the cost impact to customers including outage duration and societal disruption)
- Safety (costs associated with worker and public injuries)

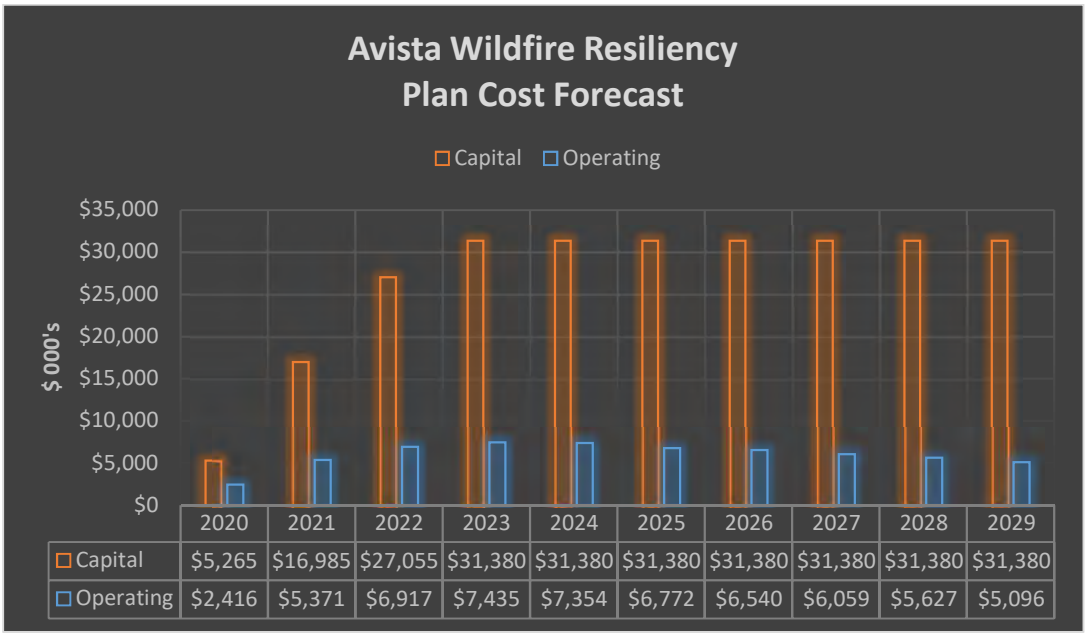
The following is a list of the 28 recommended actions indicating a range of inherent and mitigated risk costs. Note that not all the actions reflect capital investments (e.g. vegetation management). Monetized risk values represent a 10-year operating time horizon.

	Inherent Risk ($M)		Managed Risk ($M)		Cost: Benefit		Risk Red
System & Transmission	Low	High	Low	High	Low	High	%
EOP & Fire ICS Representation	9.6	17.7	9.6	17.6	0.0	2.0	0%
Fire-Weather Dashboard	4.8	8.8	4.3	4.8	0.5	3.7	33%
Engineering Review Major Events	1	6.9	0.9	2.4	1.0	45.0	58%
Wildfire Compliance Tracking	9.6	18	2.2	2.7	49.3	102.0	82%
Digital Data Collection	9.6	17.7	0.9	2.4	1.3	2.2	88%
Wood Pole FR Mesh Protection	9.6	28	4.3	4.8	2.2	9.5	76%
Fuel Reduction Partner	15	29	3	29	8.0	0.0	27%
Emergency Responder Training	1.8	2.3	0.3	0.9	1.2	1.1	71%
Conforming Rights-of-Way	4.8	8.8	0.2	1.4	0.9	1.5	88%
Transmission Inspection Pym	4	59	1.1	2.6	0.6	11.3	94%
Expedited Fire Response	-	-	-	-			n/a
Transmission Grid Hardening							n/a
Transmission Total	**$70**	**$196**	**$27**	**$69**	**0.6**	**1.9**	**64%**

	Inherent Risk ($M)		Managed Risk ($M)		Cost: Benefit		Risk Red
Electric Distribution	Low	High	Low	High	Low	High	%
Fuse Coordination Study	41	107	1.6	8.2	197.0	494.0	93%
Recloser Event Reporting	21	82	1.3	8.4	49.3	184.0	91%
Fire Ignition Tracking System	132	547	46	213	286.7	1113.3	62%
Veg Mngt in CPC designs	20	278	10	21	100.0	2570.0	90%
Fire Suppression 'wetting' agent	53	582	11	66	840.0	10320.0	88%
Dry Land Mode 'effectiveness' study	21	57	0.6	4.2	204.0	528.0	94%
WUI layer in GIS	0	0.11	0	0.11	0.0	0.0	0%
Dry Land Mode 'trigger'	-	-	-	-			n/a
Arcos Wildfire Notification	-	-	-	-			n/a
Distribution Annual Risk Tree	2,816	5,722	264	1,226	100.1	176.3	83%
Public Safety Initiative 'Right Tree-Right Place'	563	1,145	2.25	28.2	58.4	116.3	98%
Midline Recloser Communication	14.6	29	0.25	0.28	17.7	35.4	99%
Additional Midline Reclosers	22.6	39	5.63	13.2	2.9	4.4	69%
Digital Data Collection	2,816	5,722	132	564	346.3	665.5	92%
100% Substation Scada	132	547	0	1.6	7.7	31.9	100%
WA Grid Hardening in WUI Tier 2-3	823.6	1980.75	6.83	41	6.8	16.2	98%
ID Grid Hardening in WUI Tier 2-3	502.4	1208.25	4.17	25	6.8	16.2	98%
Distribution Total	**$7,978**	**$18,046**	**$486**	**$2,220**	**28.7**	**60.6**	90%

2.2 Discuss how the requested capital cost amount will be spent in the current year (or future years if a multi-year or ongoing initiative). (i.e. what are the expected functions, processes or deliverables that will result from the capital spend?)**. Include any known or estimated reductions to O&M as a result of this investment.**

The illustration indicates the estimated capital and operating investments. Though we do expect outage rates associated with vegetation and equipment failures to trend downward, O&M 'offsets' are not a significant factor. The primary focus of this plan is risk reduction and to protect the financial viability of the Company.



	2020	2021	2022	2023	2024	2025	2026	2027	2028	2029
Capital	$5,265	$16,985	$27,055	$31,380	$31,380	$31,380	$31,380	$31,380	$31,380	$31,380
Operating	$2,416	$5,371	$6,917	$7,435	$7,354	$6,772	$6,540	$6,059	$5,627	$5,096

Capital cost breakdown by year and project (values in $000's).

		Capital										
	System & Transmission	2020	2021	2022	2023	2024	2025	2026	2027	2028	2029	10-yr
ST-1	EOP & Fire ICS Representation											0
ST-2	Fire-Weather Dashboard	200	150	75								425
ST-3	Engineering Review Major Events	10	10	10	10	10	10	10	10	10	10	100
ST-4	Wildfire Compliance Tracking											0
ST-5	Digital Data Collection											0
ST-6	Wood Pole FR Mesh Protection											0
ST-7	Fuel Reduction Partner											0
ST-8	Emergency Responder Training											0
ST-9	Conforming Rights-of-Way	500	500	500	500	500	500	500	500	500	500	5,000
ST-10	Transmission Inspection Pgm	300	300	300	300	300	300	300	300	300	300	3,000
ST-11	Expedited Fire Response											0
ST-12	Transmission Grid Hardening	1,000	3,000	5,000	5,000	5,000	5,000	5,000	5,000	5,000	5,000	44,000
	Transmission Total	**$2,010**	**$3,960**	**$5,885**	**$5,810**	**$5,810**	**$5,810**	**$5,810**	**$5,810**	**$5,810**	**$5,810**	**$52,525**

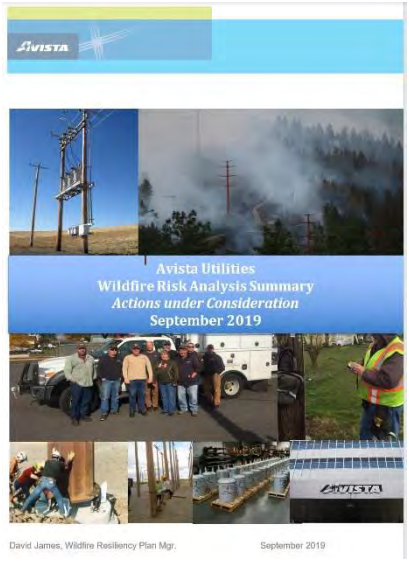
		Capital										
	Electric Distribution	2020	2021	2022	2023	2024	2025	2026	2027	2028	2029	10-yr
D-1	Fuse Coordination Study											0
D-2	Recloser Event Reporting											0
D-3	Fire Ignition Tracking System	25	75	100								200
D-4	Veg Mngt in CPC designs	10	10	10	10	10	10	10	10	10	10	100
D-5	Fire Suppression 'wetting' agent											0
D-6	Dry Land Mode 'effectiveness' study											0
D-7	WUI layer in GIS											0
D-8	Dry Land Mode 'trigger'											0
D-9	Arcos Wildfire Notification											0
D-10	Distribution Annual Risk Tree											0
D-11	Public Safety Initiative 'Right Tree-Right Place'											0
D-12	Midline Recloser Communication	20	40	60	60	60	60	60	60	60	60	540
D-13	Additional Midline Reclosers	200	400	600	600	600	600	600	600	600	600	5,400
D-14	Digital Data Collection											0
D-15	100% Substation Scada	0	1,000	2,000	2,000	2,000	2,000	2,000	2,000	2,000	2,000	17,000
D-16	WA Grid Hardening in WUI Tier 2-3	2,000	6,500	10,000	14,500	14,500	14,500	14,500	14,500	14,500	14,500	120,000
D-17	ID Grid Hardening in WUI Tier 2-3	1,000	5,000	8,400	8,400	8,400	8,400	8,400	8,400	8,400	8,400	73,200
	Distribution Total	**$3,255**	**$13,025**	**$21,170**	**$25,570**	**$25,570**	**$25,570**	**$25,570**	**$25,570**	**$25,570**	**$25,570**	**$216,440**
	D-10 - $500k/per year added to the above for budget											
	Plan Total	**$5,265**	**$16,985**	**$27,055**	**$31,380**	**$31,380**	**$31,380**	**$31,380**	**$31,380**	**$31,380**	**$31,380**	**$268,965**

2.3 Outline any business functions and processes that may be impacted (and how) by the business case for it to be successfully implemented.

Implementation has and will impact many areas of the Company including electric operations, engineering, supply chain, IT, asset management, finance and accounting. However, great care has been taken to leverage existing workflow processes and technologies to minimize disruption to the organization. This is an enterprise level program.

2.4 Discuss the alternatives that were considered and any tangible risks and mitigation strategies for each alternative.

A complete list of alternatives is included in the September 2019 publication entitled, "Wildfire Risk Analysis Summary – actions under consideration". This document focuses on the risks and costs of viable alternatives and laid the groundwork for actions adopted in the Resiliency Plan.



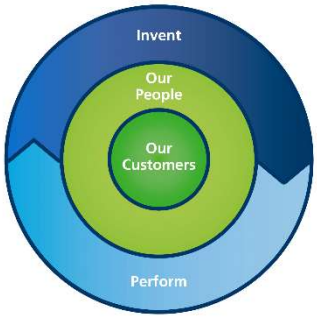
2.5 Include a timeline of when this work will be started and completed. Describe when the investments become used and useful to the customer.

The scope of this plan is considerable. Both transmission and distribution grid hardening projects will be ramped from 2020 through 2023 and then levelized through 2029. Other efforts including technology projects such as the fire-weather dashboard and the TROVE risk analysis will be conducted on the front end of the ten-year horizon. The following table indicates the capital spend levels, by year. This is a surrogate for activity.

Capital										
2020	2021	2022	2023	2024	2025	2026	2027	2028	2029	10-yr
$5,265	**$16,985**	**$27,055**	**$31,380**	**$31,380**	**$31,380**	**$31,380**	**$31,380**	**$31,380**	**$31,380**	**$268,965**

Values in $000's.

2.6 Discuss how the proposed investment aligns with strategic vision, goals, objectives and mission statement of the organization.



The stated goals of the resiliency plan are:

- Protect lives and property
- Ensure emergency preparedness and align operating practices with fire threat conditions
- Protect Avista's energy delivery infrastructure

The effort to develop a comprehensive wildfire mitigation strategy has been fully embraced by Avista's Board of Directors and executive management. The Board has requested quarterly updates since early 2020 and will receive another briefing on August 5, 2020 (D. Howell and D. James).

2.7 Include why the requested amount above is considered a prudent investment, providing or attaching any supporting documentation. In addition, please explain how the investment prudency will be reviewed and re-evaluated throughout the project

Prudency is a fundamental tenant of cost recovery. Avista has engaged directly with Idaho and Washington Utility Commissioners and their staffs. Avista's rates department recently petitioned the IPUC for deferral treatment of all wildfire related costs (capital and O&M). Discussions continue with Washington Commissioners. Events surrounding the November 2018 'Camp Fire' lead to the bankruptcy of PG&E and served as the catalyst for many utilities to assess their systems and defenses associated with wildfire.

2.8 Supplemental Information

2.8.1 Identify customers and stakeholders that interface with the business case

Avista electric customers located in Wildland Urban Interface zones 2 & 3 will be directly engaged via the process. Grid hardening and enhanced vegetation management strategies will be focused in those areas. In addition, Avista is coordinating with local and regional stakeholders including fire protection agencies, electric utilities, the Washington department of natural resources (DNR), the Idaho department of lands (IDL), and groups with an interest in or impacted by Avista's plan.

2.8.2 Identify any related Business Cases

N/A

3.1 Steering Committee or Advisory Group Information

Since February of 2019, a Wildfire Steering Committee has actively engaged in the formation and adoption of the Plan. That committee remains active and will guide efforts throughout the life of the program. Members include:

Name	Title
David Howell	Director, Electric Operations (Business Case Owner)
Bruce Howard	Sr. Director, Environmental Affairs and Real Estate
Greg Hesler	Vice President, General Counsel & Chief Compliance Officer
Alicia Gibbs	Manager, Asset Maintenance
Elizabeth Andrews	Sr. Manager, Revenue Requirements
Bob Brandkamp	Sr. Manager, Risk
Annie Gannon	Manager, Communications
Casey Fielder	Manager, Corporate Communications

3.2 Provide and discuss the governance processes and people that will provide oversight

The Wildfire Resiliency Plan will adapt and evolve to align with risk conditions and available technologies to mitigate those risks. Governance and oversight will be a consistent element throughout the life of the Plan including direct involvement by senior management and oversight via the Board of Directors.

3.3 How will decision-making, prioritization, and change requests be documented and monitored

Program management is a prescribed function of the Wildfire Plan Manager position. Monthly status reports will include status of costs, production, and forecasts including resource requirements. This plan will adapt over time as we gain experience with new elements including risk-based vegetation management, digital data collection, grid hardening, and emergency operations tactics specific to fire response.

The undersigned acknowledge they have reviewed the ***Wildfire Resiliency Plan business case*** and agree with the approach it presents. Significant changes to this

will be coordinated with and approved by the undersigned or their designated representatives.

Signature:	David Howell	Date:	8/2/20
Print Name:	David Howell		
Title:	Director, Electric Operations		
Role:	Business Case Owner		

Signature:		Date:	
Print Name:	Heather Rosentrater		
Title:	Sr Vice President, Energy Delivery & Shared Services		
Role:	Business Case Sponsor		

Signature:		Date:	
Print Name:	David Howell (on behalf of WFRES Steering Group)		
Title:			
Role:	Steering/Advisory Committee Review		

will be coordinated with and approved by the undersigned or their designated representatives.

Signature:		Date:	
Print Name:	David Howell		
Title:	Director, Electric Operations		
Role:	Business Case Owner		

Signature:	Heather Rosentrater	Date:	10/7/2020
Print Name:	Heather Rosentrater		
Title:	Sr Vice President, Energy Delivery & Shared Services		
Role:	Business Case Sponsor		

Signature:		Date:	
Print Name:	David Howell (on behalf of WFRES Steering Group)		
Title:			
Role:	Steering/Advisory Committee Review		