

**BEFORE THE WASHINGTON  
UTILITIES & TRANSPORTATION COMMISSION**

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION,

Complainant,

v.

AVISTA CORPORATION D/B/A/ AVISTA UTILITIES

Respondent.

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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**

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**EXHIBIT AT-2**

List of Avista Wildfire Metrics

July 29, 2022

## List of Avista Wildfire Metrics

### I. AVISTA 2022 WILDFIRE RESILIENCY PLAN METRICS

The following wildfire metrics are currently being tracked according to Avista's 2022 Wildfire resiliency plan<sup>1</sup>:

	Metric
1	Tree Fall-Ins
2	Tree Grow-Ins
3	Pole Fires
4	Overhead Equipment Failures
5	Spark Ignition Events
6	Transmission Steel Pole Conversions
7	Transmission Fire Resistant Pole Wraps Installed
8	Miles of Distribution Grid Hardening
9	Number of Dry Land Mode Automation Devices Installed
10	Risk Tree Miles Patrolled
11	Number of Risk Trees Identified/Mitigated
12	Acres of Transmission Corridors Cleared
13	Miles of LiDAR Imaging Completed
14	Miles of Satellite Imaging Completed

### II. AVISTA'S ORIGINAL GENERATE RATE CASE PROPOSAL

In Dockets UE-220053, UG-220054, and UE-210854 (*consolidated*), Avista originally proposed the following wildfire Performance Incentive Mechanism (PIM)<sup>2</sup>:

**Measure 11: Wildfire Resiliency Performance Measure** – Complete a risk tree inspection of non-urban transmission and distribution electrical feeder miles on an annual basis, and schedule or plan for mitigation.

- If Avista completes a risk tree inspection for 96% of the non-urban transmission and distribution electrical feeder miles or greater, Avista would receive an incentive of \$500,000.
- If Avista completes a risk tree inspection for 94-95% of the non-urban transmission and distribution electrical feeder miles or greater, Avista would receive no incentive or penalty.
- If Avista completes a risk tree inspection of less than 94% of the non-urban transmission and distribution electrical feeder miles or greater, Avista would pay a penalty of \$500,000.

<sup>1</sup> See Direct Testimony of David R. Howell, Exh. DRH-2T at 24,

<sup>2</sup> See Ehrbar, Exh. PDE-1T at 33:21–23 and 35:2–9.

### III. FULL MULTIPARTY SETTLEMENT STIPULATION

In Dockets UE-220053, UG-220054, and UE-210854 (*consolidated*), Avista Corporation, the Staff of the Washington Utilities and Transportation Commission, the Alliance of Western Energy Consumers, the NW Energy Coalition, The Energy Project, Sierra Club, Walmart, and Small Business Utility Advocates, jointly referred to as the “Settling Parties” agreed to a Full Multiparty Settlement Stipulation which included the following wildfire-related performance-based ratemaking metrics<sup>3</sup>:

#### *Electric Reliability*

	<b>Metric</b>
<b>48</b>	Number of outages by category during the Fire Season (June 1-Oct. 1) vs No Fire Season
<b>49</b>	Number of overhead equipment failures by subcategory (arrestors, capacitor, insulator, fuse, conductor, etc.) during Fire Season (June 1-Oct. 1) vs No Fire Season

#### *Wildfire*

*Report the following wildfire program metrics on an annual basis with both annual incremental amount and total cumulative amount along with annual incremental cost per wildfire mitigation component.*

	<b>Metric</b>
<b>50</b>	Number and percent of planned pre-season vegetation inspections and remediation performed on time
<b>51</b>	Number of trees trimmed
<b>52</b>	Number of hazard trees removed
<b>53</b>	Number of trees replaced through the Customer Choice Right Tree Right Place program
<b>54</b>	Number of trees removed through customer requests
<b>55</b>	Trees and brush removed and trees trimmed from the Fuel Reduction Partnerships
<b>56</b>	Number of reclosers installed
<b>57</b>	Number of circuit breakers upgraded with supervisory control and data acquisition
<b>58</b>	Miles of Wildland Urban Interface
<b>59</b>	Number and percent of distribution grid hardening projects planned vs completed
<b>60</b>	Miles of conductor undergrounded
<b>61</b>	Miles of copper conductor replaced
<b>62</b>	Number of small copper wire units removed
<b>63</b>	Number of wildlife guards installed
<b>64</b>	Number of open wire secondary districts removed
<b>65</b>	Number of wedge/bail clamps at hot tap connection points installed
<b>66</b>	*Include reporting of other existing Wildfire Plan metrics like number of fiber-glass arms installed, fire resistant wrap installed, Dry Land Mode (DLM) automation devices installed, etc.

<sup>3</sup> Full Multiparty Settlement Stipulation Attachment B at 3 and 4.

The Settling Parties agreed not to implement the financial PIMs proposed by the Company (Exh. PDE-1T, starting at pp. 25, line 5 – pp. 35, line 13) in this docket.

**IV. PUBLIC COUNSEL’S PROPOSED WILDFIRE METRICS**

Public Counsel recommends that Avista standardize and formalize data capture and retrieval of risk events, ignitions, and impact. Avista should also formally consult with peer West coast utilities on how they track risk events and ignitions and explore partnerships with AlertWildfire, fire agencies, and universities to evaluate using wildfire cameras on utility infrastructure.

Public Counsel recommends that Avista track and report the following wildfire metrics related to risk events, ignition events, reliability, and communications and outreach:

***Risk and Ignition Event Metrics***

*Report metrics listed in Table 2, 6, 7.1, and 7.2 of Attachment 3 in the California Office of Energy Infrastructure Safety (COEIS) Wildfire Mitigation Plan Non-Spatial Data Template.<sup>4</sup> Below are previews of the listed tables for reference:*

**Table 2 of Attachment 3: Recent performance on outcome metrics, last 7 years– reference only, fill out attached spreadsheet to correct prior reports**

Metric type	#	Outcome metric name	Wind Warning Status	HFTD Tier	2015	2016
1. Risk Events	1.a.	Number of all events with probability of ignition, including wires down, contacts with objects, line slap, events with evidence of heat generation, and other events that cause sparking or have the potential to cause ignition	All	1		
			RFW	1		
			HWW	1		
			HWW & RFW	1		
			HWW & not RFW	1		

**Table 6 of Attachment 3: Weather patterns, last 7 years – reference only, fill out attached spreadsheet to correct prior reports**

Metric type	#	Progress metric name	2015	2016	2017	2018	2019	2020	2021	Unit(s)
1. Red Flag Warning overhead Circuit Mile Days	1.a.	Red Flag Warning overhead Circuit Mile days - entire utility territory								RFW OH circuit mile days
	1.b.	Red Flag Warning overhead Circuit Mile days - HFTD Zone 1								RFW OH circuit mile days
	1.c.	Red Flag Warning overhead Circuit Mile days - HFTD Tier 2								RFW OH circuit mile days
...	...									...

<sup>4</sup> California Office of Energy Infrastructure Safety, 2022 WILDFIRE MITIGATION PLAN UPDATE GUIDELINES TEMPLATE OFFICE OF ENERGY INFRASTRUCTURE SAFETY, Attach. 3 (2022) Wildfire Mitigation Plan Guidance Document), <https://energysafety.ca.gov/what-we-do/electrical-infrastructure-safety/wildfire-mitigation-and-safety/wildfire-mitigation-plans/2022-wmp/> (Last Visited July 12, 2022).

**Table 7.1 of Attachment 3: Key recent and projected drivers of outages, last 7 years and projections – reference only, fill out attached spreadsheet to correct prior reports**

Risk Event category	Cause category	#	Sub-cause category	Are risk events tracked?	Actual number of risk events							Projected risk events				
					2015	2016	2017	2018	2019	2020	2021	2022	2022	Q3	Q4	
					2022	2022	2022	2022								
Wire down event - Distribution	1. Contact from object - Distribution	1.a.	Veg. contact-Distribution													
		1.b.	Animal contact-Distribution													
		1.c.	Balloon contact-Distribution													
...	...	...	...	...	...	...	...	...	...	...	...	...	...	...	...	...

**Table 7.2 of Attachment 3: Key recent and projected drivers of ignition probability by Line type and HFTD status, last 7 years and projections – reference only, fill out attached spreadsheet to correct prior reports**

Metric Type	#	Ignition Driver	Line Type	HFTD Tier	Are ignitions tracked? (Yes/No)	Actual number of ignitions							Projected numbers of ignitions	
						2015	2016	2017	2018	2019	2020	2021	2022	2023
1. Contact from object	1.a.i	Veg. contact	Distribution	Non-HFTD										
	1.a.ii	Veg. contact	Distribution	HFTD Zone 1										
	1.a.iii	Veg.	Distribution	HFTD Tier 2										

Additionally, report risk and ignition event-specific data and spatial data which includes geotagging a risk event photo log, a risk event asset log, and ignition event details as described in COEIS’ Geographic Information Systems Data Standard.<sup>5</sup>

**Reliability Metrics**

	Metric
1	Number of and location of outages from tree fall-ins outside the utility corridor
2	Number of and location of ignition events from tree fall-ins outside the utility corridor
3	Electric reliability metrics (SAIDI, SAIFI, CAIDI, CEMI, etc.) in Non-Fire Season
4	Electric reliability metrics (SAIDI, SAIFI, CAIDI, CEMI, etc.) in Base Level DLM
5	Electric reliability metrics (SAIDI, SAIFI, CAIDI, CEMI, etc.) in Elevated DLM: Fire 2 Shot
6	Electric reliability metrics (SAIDI, SAIFI, CAIDI, CEMI, etc.) in Elevated DLM: Fire 1 Shot

**Communications and Outreach Metrics**

	Metric
1	Translated wildfire collateral
2	Languages provided for written and telephonic customer support

<sup>5</sup> California Office of Energy Infrastructure Safety, 2021 GEOGRAPHIC INFORMATION SYSTEMS DATA STANDARD VERSION 2.1 at 69-74 (2021) [https://energysafety.ca.gov/wp-content/uploads/energy-safety-gis-data-reporting-standard\\_version2.1\\_09072021\\_final.pdf](https://energysafety.ca.gov/wp-content/uploads/energy-safety-gis-data-reporting-standard_version2.1_09072021_final.pdf) (Last Visited July 18, 2022).

3	Customer reach via multiple channels (social media, local news media, telephone calls, website communications, mobile app communications, community meetings, etc.)
4	Customer engagement via multiple channels (social media, local news media, telephone calls, website communications, mobile app communications, community meetings, etc.)
5	Customer participation and feedback via multiple channels (survey, community meetings, website, mobile app, etc.)
6	Number of identified Access and Functional Needs customers
7	Number of Customers receiving text/SMS
8	Number of Customers receiving email
9	Number of Customers receiving mobile app service reliability and wildfire updates