



# Special Public Meeting Wildfire Mitigation Plan Presentation & Process Discussion

March 19, 2024

# AGENDA

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- Welcome & introduction (1:30-1:40)
- Utility presentations of WMPs (1:40-3:20 or so)
  - Idaho Power
  - Pacific Power
  - Portland General Electric
  - Questions and answers
- Break (3:20-3:30)
- OPUC reviews process (3:30-3:50)
  - Introduce Independent Evaluator (IE) Melissa Semcer of Climate, Wildfire and Energy Strategies
- Stakeholder comments & discussion (3:50-4:30)
- Next steps

# WORKSHOP PURPOSE

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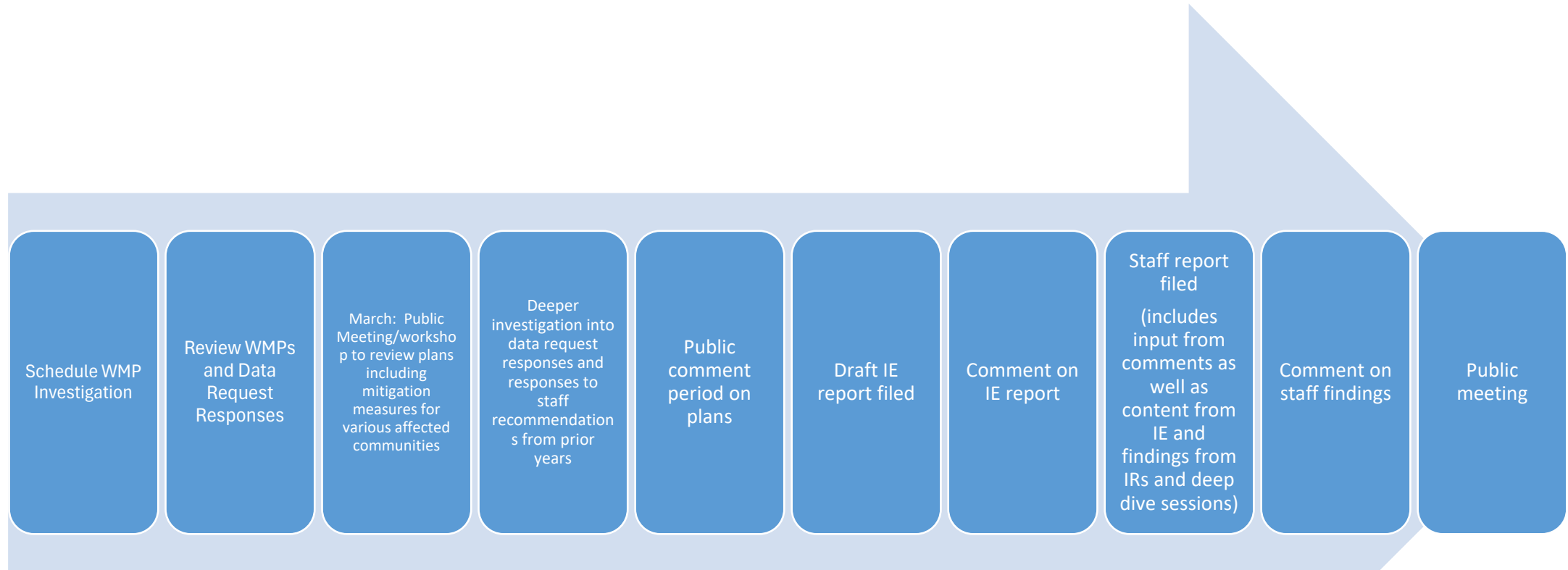
- The investor-owned utilities filed wildfire mitigation plans (WMPs) in compliance with Oregon Senate Bill 762 (2021) and Oregon Administrative Rules (Division 300 and 24) on 12/29/2023
- The purpose of this workshop is to initiate evaluation into the plans:
- Provide each utility an opportunity to share:
  - Overviews of the WMP
    - a) How they incorporated feedback from last year's plan reviews
    - b) What they learned during 2023 and how it influenced this plan
    - c) Activities completed during 2023 and its effect on future years
  - Review the requirements for the plans & discuss investigation process

# UTILITY PRESENTATIONS

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- IDAHO POWER
- PACIFIC POWER/PACIFICORP
- PORTLAND GENERAL ELECTRIC

# 2024 WMP PROCESS



# 2024 WMP PROCESS

| Date  | Event  |
|---|--|
| 12/6/2023   | Discussion re IE use during 2024 review period   |
| 12/20/2023  | Meeting with Joint Utilities <ul style="list-style-type: none"> <li>• Discussion of Plan Investigation Process, including</li> <li>• Use of IE</li> <li>• Standard Data Request</li> <li>• Intent to hold Public Workshop including presentations by utilities; plan overview, mitigations planned for impacted communities</li> </ul> |
| 12/29/2023  | Utilities files WMPs (statutory requirement to approve or approve with conditions by 6/26/2024)  |
| 1/2/2024  | Initiated standard data requests: set 1-risk & mitigation, including technology  |
| 1/18/2024   | Initiate standard data requests: set 2-inspection & vegetation management & stakeholder outreach   |
| 1/16/2024   | Set 1 Due  |
| 2/1/2024  | Set 2 Due; requests to extend due dates to 2/7 & 2/15  |
| March 19, 2024 1:30 PM  | PACIFICORP, PORTLAND GENERAL ELECTRIC, IDAHO POWER<br>UM 2207, 2208, 2209 - Wildfire Mitigation Plans – Utility Presentations and Discussion of Mitigation Plans <ul style="list-style-type: none"> <li>• Mitigations planned within the planning horizon, for impacted communities</li> </ul>   |
| <i>March- Late April/Early May:<br/>Individual company data request<br/>meetings seem most useful</i> | <p>Set 1 Topics: Risk Areas, Assessment, Reduction &amp; Mitigation/Costs</p> <p>Set 2 Topics: Inspection &amp; Correction, Vegetation Management &amp; Community Outreach</p>   |
| Early May 2024  | Draft IE Report Filed  |
| 5/23/2024   | Responsive Comments on all issues, including Draft IE Report   |
| 5/30/2024   | Final IE Report Filed  |
| 6/12/2024   | Staff Public Meeting Memo Published with Recommendations   |
| 6/20/2024   | Public Comments on Memo Due  |
| 6/25/2024   | Regular Public Meeting   |

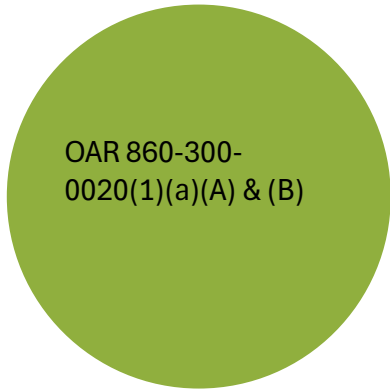
# INTRODUCE INDEPENDENT EVALUATOR

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## **Melissa Semcer**

Chief Strategist & Principal Consultant  
Climate, Wildfire and Energy Strategies, LLC

Climate Wildfire and Energy Strategies (CWE Strategies) is a boutique consulting and expert witness firm specializing in utility wildfire mitigation and climate resilience for policy makers, utilities, and stakeholders. CWE Strategies serves a variety of clients including state public utilities commissions, electric utilities, stakeholder engagement groups and climate resilience start-ups.



Wildfire Protection Plans and Updates must, at a minimum, contain the following requirements as set forth in Senate Bill 762 (2021) and OAR 860-300

- 1) Identified areas that are subject to a heightened risk of wildfire, including determinations for such conclusions, and are:
  - (A) Within the service territory of the Public Utility, and
  - (B) Outside the service territory of the Public Utility but within the Public Utility's right-of-way for generations and transmission assets

- 2022 Clarification of expectations

- \*\* Describe the approach, data inputs, analysis completed, quantitative risk asset tools and techniques, and industry standards utilized to identify areas subject to heightened risk of wildfire within and outside the service territory

- \*\* Describe analysis to both evaluate risk from the environment and specific utility asset types (if considered). Is slope, aspect and fuel models used to evaluate risk?

- \*\* Describe process that will be followed to evaluate areas on an annual basis.

- 2023 Clarification

Provide details of the analysis completed to identify the fire risk zones, as well as the proactive de-energization zones including how classification of tiers may have been developed. Also, describe compared to industry approach taken, and resources involved in the map decision-making. Include process to discuss refresh of map datasets, and governance for annual processes associated with map risk management. Detail aspects of map data. Outline assets and their relationship to determining risk designation. For risk management, as assets are hardened, or other programs deployed how is the risk information being updated. Also, where input from local jurisdictions or other subject matter experts are consulted, identify what process is used to document the product provided, the comments received and the changes made as a result of input. If PSPS was conducted in areas not previously identified as at risk for PSPS, outline how the contemporary risk used to make that determination compared to the historic risk used to prioritize mitigation efforts and any planned changes that resulted from the experience.



| OAR 860-300-0020 | ID | Wildfire Protection Plans and Updates must, at a minimum, contain the following requirements as set forth in Senate Bill 762 (2021) and OAR 860-300  | Expectation of demonstrated compliance   | OPUC Clarification   |
|------------------|----|--|--|--|
| (1)(a)(A) & (B)  | 1  | Identified areas that are subject to a heightened risk of wildfire, including determinations for such conclusions, and are:<br><b>(A) Within the service territory of the Public Utility, and<br/>(B) Outside the service territory of the Public Utility but within the Public Utility's right-of-way for generations and transmission assets</b> | <p>** Describe the approach, data inputs, analysis completed, quantitative risk asset tools and techniques, and industry standards utilized to identify areas subject to heightened risk of wildfire within and outside the service territory</p> <p>** Describe analysis to both evaluate risk from the environment and specific utility asset types (if considered). Is slope, aspect and fuel models used to evaluate risk?</p> <p>** Describe process that will be followed to evaluate areas on an annual basis.</p>  | Provide details of the analysis completed to identify the fire risk zones, as well as the proactive de-energization zones including how classification of tiers may have been developed. Also, describe compared to industry approach taken, and resources involved in the map decision-making. Include process to discuss refresh of map datasets, and governance for annual processes associated with map risk management. Detail aspects of map data. Outline assets and their relationship to determining risk designation. For risk management, as assets are hardened, or other programs deployed how is the risk information being updated. Also, where input from local jurisdictions or other subject matter experts are consulted, identify what process is used to document the product provided, the comments received and the changes made as a result of input. If PSPS was conducted in areas not previously identified as at risk for PSPS, outline how the contemporary risk used to make that determination compared to the historic risk used to prioritize mitigation efforts and any planned changes that resulted from the experience.     |
| (1)(b)           | 2  | Identify means of mitigating wildfire risk that reflects a reasonable balancing of mitigation cost with the resulting reduction of wildfire risk.  | <p>** Describe the main activities being utilized to reduce wildfire risk, how they reduce risk, and how the utility's planned chosen activities balance costs with effectiveness of reducing wildfire risk.</p> <p>** Describe how the effectiveness of the activities will be measured, or have been measured. Compare/contrast 2022/2023</p> <p>** What details have been provided that clearly indicates how the assigned budget/associated cost align with the overall benefit of reduced fire risk.</p> <p>** Describe in metrics, mitigation efforts, line miles cleared, how many poles (T&amp;D) were cleared, etc</p>  | Identify risk drivers used by the utility to determine ignition risk. Compare mitigation measures against risk drivers and identify which measures have the greatest likelihood of either reducing ignition, reducing duration of heat, reducing extent of impact or fully eliminating the risk driver. Provide the analysis of measure risk reduction plan activities to their cost, as well as how effectiveness is estimated or calculated. Provide information on all wildfire in the service territory for the prior year, as well as root cause analysis for them. Include details of how any specific strategy resulted in improvements in wildfire risk. Outline program changes made to the WMP based on effectiveness calculations or estimations.   |
| (1)(c)           | 3  | Identify preventative actions and programs that the <u>Public Utility</u> will carry out to minimize the risk of utility facilities causing wildfire.  | <p>Information provided demonstrates/narrates the measurements of preventative actions that are specific to reducing the risk and exposures to wildfire, thus improving the preventative measures, priorities and quantitative results from the preventative actions or programs. Compare/contrast 2022/2023</p> <p>** Describe risk analysis and mitigation, if any, performed on sub-stations within Utility boundaries.</p>   | Outline activities delivered that reduce wildfire risk for the reporting period. Estimate risk buy down based on work delivered and prepare some form of valuation associated with that expenditure. Detail whether the activity is a recurring one or one-time expense, as well as its estimated duration of effectiveness. Estimate any cost reductions associated with base rates for the activity delivered (such as reconditioning or undergrounding and reduced fault rate).   |
| (1)(d)           | 4  | Demonstration of outreach efforts to regional, state, and local entities, including municipalities regarding a protocol for the de-energization of power lines and adjusting power system operations to mitigate wildfires, promote the safety of the public and first responders and preserve health and communication infrastructure.            | <p>** Provide geographical boundary of impacted areas of the service territory that may be affected by a PSPS event or modified power system operations.</p> <p>** Provide list of specific regional, state and local entities, including municipalities, who have been reached out to, when are they reached out to, who will be reached out to, and the results of the outreach. Provide detail of topics covered, and input from agencies that have impacted utility wildfire risk reduction planned activities.</p>  | Clearly outline areas at risk of PSPS. Include more detail regarding meetings with Public Safety Partners, including frequency, methods and content of communications. Specify with roles, including local, county and state agencies, in addition to those providing critical services to communities need to be outlined. Identify methods for communities to self identify specific services or locations that warrant consideration within the local area plans should a PSPS be required. Also, identify methods undertaken by the company to collaborate with other electric companies to coordinate and communicate consistently with public safety partners.   |
| (1)(e)           | 5  | Identified protocol for the de-energization of power lines and adjusting of power system operations to mitigate wildfires, promote the safety of the public and first responders and preserve health and communication infrastructure, including a PSPS communication strategy consistent with OAR 860-300-0040 and OAR 860-300-0050               | <p>** Overview of steps completed by the utility leading up to a PSPS, and closing a PSPS event.</p> <p>** Detailed descriptions of each step of the process, including: information used and analysis completed to make decisions for the steps, utility staff involved in the steps and the utility decision-maker(s), interaction with entities outside of the utility that impact decisions, communication protocols (internal and external), typical duration of each step.</p> <p>** Description of adjusted power system operations to mitigate wildfire, and description of operations in none wildfire threat conditions. Include details of: information used and analysis completed before adjusting operations, utility staff involved with adjusting operations, reasoning/logic to specific operational choices.</p> <p>** Describe vulnerabilities to stakeholders such as emergency responders and public safety officials when de-energizing of the system occurs and what is necessary to communicate when a re-energization occurs due to an emergent situation and how they are defined.</p> | Discussion of after-action reviews, as well as any customer or public safety partner surveys performed by the company and its impact on protocols. Clear identification of the use of community resource centers and the benefits attributed to them via ad hoc or intentionally developed surveys regarding their use. Provide further detail regarding operational strategies employed that may lead up to a PSPS, such as system settings changes, how and when those are enacted, who is responsible for making that decision, what effectiveness of the measures is conducted to more strategically align system operations against relevant risks. Detail any pre-PSPS event patrols, surveys or other resource deployment and the risk spend considerations undertaken to properly align protocols and resources against risks. Clarify the selections outlined in the plan using studies performed that rationalize the protocols established. Outline how such operations are intended to change as system mitigation projects are delivered, including estimating their impact to customers and communities with regard to reliability and resilience. |

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|------------------|----|--|--|--|
| (1)(f)           | 6  | Identification of the community outreach and public awareness efforts that the Public Utility will use before, during and after a wildfire season, consistent with OAR 860-300-0040 and OAR 860-300-0050.  | <p>** Comprehensive list of completed community outreach and public awareness effort types and planned (new or repeat type of engagement and outreach) effort types in 2022.</p> <p>** Detailed description of each activity: content and messaging of outreach and communication, why it was chosen its expected audience, its expected impact, measures to ensure communication techniques are successful in reaching the target audience, who from the utility supports the effort, outside organizations who support the effort, and when it is planned (before, during and after wildfire season).</p>  | Evaluate communication timelines relating to pre-fire season coordination and communication as well as during fire season communications, in addition to elevated risk period communications, such as during PSPS. Include rosters of attendees. Detail messages produced through various channels that demonstrate how company communicates with customers and the general public regarding wildfire mitigation strategies, including PSPS. Identify methods to maximize reach and understanding across all public of any intended PSPS, including languages used, media employed, use of community-based resources, alignment with local stakeholder groups.   |
| (1)(g)           | 7  | Description of procedures, standards, and time frames that the Public Utility will use to inspect utility infrastructure in areas the Public Utility identified as heightened risk of wildfire, consistent with OAR 860-024-0018.  | <p>** Description of inspection activities in non-high wildfire risk areas, separated by distribution and transmission (inspection types, frequencies, correction protocols).</p> <p>** Description of procedures and standards utilized to guide inspection activities in wildfire risk areas.</p> <p>** Description of inspection activities in wildfire risk areas, detailed by miles and structures of impacted distribution and transmission assets, inspection types and methods, frequency, infraction categorization, infraction protocol.</p> <p>** Explanation of logic/reasoning in selected inspection practices in wildfire risk areas.</p>   | Clearly identify inspection and correction procedures and protocols for non-wildfire risk zones, also delineate inspection and correction procedures and protocols that differ from non-wildfire risk zones. Specify inspection and correction scopes of work in PSPS or high fire risk zones, as well as those areas which were not previously PSPS areas, but were involved in a PSPS event. Detail the risk informed frequency determination. Identify how the inspection scope of work or frequency is intended to change as mitigation measures are completed. Identify how the company has determined its scope of work and frequency. Provide detail clarifying frequency of discovery of fire risk conditions for each type of fire risk area, for each calendar year, detail provided should include but is not limited to: condition type, inspector type (contract, company employee), location type (HRFZ, PSPS area, ad hoc PSPS area, non fire risk area, versus total conditions found and total inspections performed, mileage of conductors by conductor type, by location type.  |
| (1)(h)           | 8  | Description of the procedures, standards, and time frames that the Public Utility will use to carry out vegetation management in areas the Public Utility identified as heightened risk of wildfire, consistent with OAR 860-024-0018.   | <p>** Description of vegetation management activities in non-high wildfire risk areas (trimming and clearing protocol and frequency, inspection frequency, QA/QC program, separated by transmission and distribution).</p> <p>** Description of vegetation management activities in wildfire risk areas, detailed by miles and structures of impacted distribution and transmission assets, trimming and clearing protocol and frequency, inspections, QA/QC program (separated clearly between distribution and transmission activities).</p> <p>** Explanation of logic/reasoning in selected vegetation management practices in wildfire risk areas.</p> <p>** Describe the process for reviewing practices and methods to ensure effectiveness with plan procedures.</p> | Logic and details of analysis completed for programming decisions in HRFZs regarding vegetation management practices and protocols, particularly as it relates to legacy vegetation management versus those PSPS or HRFZs. Provide logic and details of analysis completed for the programming decisions based on non-fire risk area, non-fire risk areas that have had PSPS events, PSPS areas and HRFZs by location type in Oregon regarding vegetation management practices and protocols. Provide any analysis of historical events regarding company power lines, vegetation and wildfires that informed the vegetation management program design. Clearly identify vegetation management practices and protocols for non-wildfire risk zones, vegetation management practices and protocols for non-fire risk areas, non-fire risk areas that have had PSPS events, PSPS areas and HRFZs, along with the impacted line-miles and structure counts (by these location designations) for transmission and distribution assets in Oregon. Provide information regarding quality control/quality assurance program and audits for vegetation management work completed by non-fire risk areas, non-fire risk areas that have had PSPS events, PSPS areas and HRFZs, including measures employed, findings discovered, and work processes modified as a result. Provide any analysis of historical events regarding company power lines, vegetation and wildfires that informed the vegetation management program design. |
| (1)(i)           | 9  | Identification of the development, implementation, and administrative costs for the plan, which includes discussion of risk-based cost and benefit analysis, including consideration of technologies that offer co-benefits to the utility's system.   | <p>** Summary of plan activities that are incremental costs to "baseline" utility operations.</p> <p>** Two detailed tables, one for capital costs and one for expense (O&amp;M) costs, with annual costs for each plan activity, and a forecast of costs for the activities described in the plan that are anticipated to go beyond 2022.</p> <p>** Summary discussion of decision-making process on planned expenditures, based on risk-based cost and benefit analysis, and co-benefits to the utility's system.</p>  | Logic and details of analysis completed for programming decisions in HRFZs regarding plan activities. Provide details of the cost-benefit analysis completed to support decisions of program strategy and scale. Provide details by cost type for each program or project outlined in the WMP, at minimum engineering/design, field labor, materials, contractor, AFUDC, overhead. Program level forecasted costs, by WMP year, as well as a forecast of costs at a minimum of three years out. Cost benefit analysis should include ignition risk drivers, ignition probability, magnitude of impacts, risk estimates, as well as mitigation measure cost estimates.  |
| (1)(j)           | 10 | Description of participation in national and international forums, including workshops identified in section 2, chapter 592, Oregon Laws 2021, as well as research and analysis the Public Utility has undertaken to maintain expertise in leading edge technologies and operational practices, as well as how such technologies and operational practices have been used develop implement cost effective wildfire mitigation solutions | <p>** Comprehensive list of national and international forums and state workshops attended by utility staff, and nature of participation in the forums and workshops (who attended from the utility, who presented from the utility).</p> <p>** Research and analysis the utility is doing or has completed regarding leading edge technology and operational practices.</p> <p>** Results of research and analysis of technology and operational practices that have been implemented into cost-effective wildfire mitigation solutions.</p>  | Continue to provide highlights of collaboration with industry channels, both information and knowledge shared from the company, and valuable information learned through the engagements. Provide details of the research and analysis for leading edge technologies and operational practices and the results of that research and analysis. Detail all meetings, with topics and staff attendance for collaboration within industry channels. Identify all pilot projects outlined in mitigation plans and how risk valuation for the pilot activity with regard to benefits delivered. Identify costs related to each pilot, degree of maturity of that pilot activity.   |
| (1)(k)           | 11 | Description of ignition inspection programs, as described in Division 24 of these rules, including how the utility will determine, and instruct its inspectors to determine conditions that could pose an ignition risk on its own equipment and pole attachments.   | <p>**Detailed Information associated with the factors/values considered to support the inspector instruction for identification of ignition risks</p> <p>**Description of training documentation for inspectors</p> <p>**Description of prioritized list of areas to be inspected</p> <p>**Description of completed Q/A for Ignition Inspection Programs</p>   | Completely filled out ignition reports. For any ignitions reported, company must assemble information supportive of the report, including weather (supply relevant information consistent with inputs to fire risk assessment). All root cause analyses regarding equipment involved in ignition reports.  |

# NEXT STEPS

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- STAKEHOLDER COMMENTS
- CONTINUE INVESTIGATION AND ANALYSIS
- ANNOUNCE COMMENT PERIOD
- ADDITIONAL QUESTIONS?