

VIA ELECTRONIC FILING

March 11, 2022

Public Utility Commission of Oregon
201 High Street SE, Suite 100
P.O. Box 1088
Salem, Oregon 97301

Re: Docket UM 2209 – Comments on Independent Evaluator’s Draft Report of Idaho Power’s Wildfire Mitigation Plan

Dear Filing Center:

Idaho Power Company (“Idaho Power” or “Company”) is grateful for the opportunity to submit comments in the Public Utility Commission of Oregon’s (“OPUC” or “Commission”) Docket UM 2209. Idaho Power offers these comments on the draft report produced by the independent evaluator, Bureau Veritas (“BV”), on the Company’s Wildfire Mitigation Plan (“WMP” or “Plan”). Idaho Power values BV’s detailed review and recognizes that many of its recommendations could help the Company further improve and refine its WMP in the future.

In the following comments, Idaho Power offers important context and feedback on BV’s draft report. But before doing so, the Company would like to highlight the division between the metrics by which BV conducted its review and the rule language that governed all the WMP submissions by the three investor-owned utilities (“IOUs”).

BV’s metrics, which were developed after utility WMPs were filed and without input from stakeholders, should be considered useful suggestions for future WMPs. They should not be used to determine acceptance of Idaho Power’s submitted WMP in this case.

Idaho Power certainly recognizes BV’s depth of experience in reviewing utility wildfire plans for compliance. However, it is Idaho Power’s understanding that BV was not hired to conduct a compliance review. Rather, the evaluator was leveraged to assess whether each IOU met the requirements of the AR 648 rulemaking with its inaugural WMP.

The title of BV’s report—Independent Evaluator Report on Wildfire Mitigation Plan Compliance¹— indicates that the evaluator undertook a compliance exercise, with the assumption that Idaho Power had already carried out all aspects of its Plan.

Importantly, had Idaho Power known BV’s metrics prior to submitting its Plan, many of the metrics could have been met and included in the Plan. The Company either accomplished or intended to accomplish many of the actions that BV recommended, but these items weren’t required to be documented per the AR 648 requirements. Similarly, had BV conducted a compliance review after the 2022 wildfire season, the Company would have been able to demonstrate compliance with many of BV’s derived metrics.

Based on the information available to the Company at the time that BV’s report was prepared, it was unclear how the report would be used to evaluate or inform acceptance of Idaho Power’s WMP. In the absence of such guidance, the Company would like to reiterate that BV’s draft report appears to be far removed from the objective and requirements established in the AR 648 interim rulemaking. The following comments speak to the Company’s concern that metrics not approved under AR 648 appear to be guiding acceptance of utility WMPs.

BACKGROUND

The Oregon legislature’s Senate Bill 762 (“SB 762”) wildfire bill was signed into law by Governor Brown on July 19, 2021. It requires that utilities file inaugural WMPs for the 2022 fire season no later than December 31, 2021.²

In response to the passage of SB 762, Staff halted the permanent wildfire rulemaking in AR 638 and established the AR 648 docket to develop interim permanent rules adhering to the requirements and timing of the new law. On September 15, 2021, the OPUC adopted Staff’s recommendation to open a rulemaking in AR 648, thereby commencing a formal rulemaking for interim wildfire rules.

On November 30, 2021, the Commission issued Order No. 20-440, adopting rules to govern WMPs. The rule language mirrors the language in SB 762. Specifically, the Commission’s order established Oregon Administrative Rule (“OAR”) 860-300-0001 through 860-300-0004, with OAR 860-300-0002 governing Wildfire Protection Plan Filing Requirements.

The Company filed its WMP in accordance with the requirements of OAR 860-300-0002 on December 30, 2021, and it is on these requirements that acceptance of the Company’s WMP should be based, not on the subsequently designed metrics by BV.

¹ See “Independent Evaluator report on Wildfire Plan Compliance: Idaho Power”: <https://edocs.puc.state.or.us/efdocs/HAH/um2209hah141420.pdf>

² SB 762, Section 5.

BV DRAFT REPORT

Idaho Power was assessed by BV on ten “subject areas” that align with the ten subparts of OAR 860-300-0002. For each subject area, BV developed several detailed compliance metrics. Of the ten areas, BV determined that Idaho Power “met,” “substantially met,” or “partially met” the bulk of BV’s metrics in 8 of 10 areas. It also assessed that the Company did not meet BV’s detailed metrics (in full or in part) in five subject areas. The Company’s comments below focus on sections for which BV assessed that the Company did not meet the detailed metrics.

Executive Summary

BV’s executive summary includes a list of “key recommendations” that blend the actual rule requirements established in AR 648 with the evaluator’s assessment using its detailed metrics. Given that Idaho Power filed its Plan in accordance with OAR 860-300-002, the Company suggests that BV isolate recommendations specific to rule requirements from those that are beyond the scope of the rules. The latter should be appropriately labeled as suggestions for 2023 and beyond.

Additionally, the Company believes two references to Pacific Power on page 6 of the draft report should be relabeled to reference Idaho Power.

Subject Area 2

Subject Area 2: Identify means of mitigating wildfire risk that reflects a reasonable balancing of mitigation cost with the resulting reduction of wildfire risk.³

For Subject Area 2, as titled in BV’s report, the evaluator assessed that the Company’s WMP did not meet BV’s detailed metrics. The Company disagrees with this assessment. Idaho Power provided a cost-benefit discussion in its WMP that the Company believes fully achieves the objectives of the relevant rule language. The Company comprehensively identified means of mitigating wildfire risk through system hardening, personnel practices, situational awareness, and vegetation management. The Company believes that its detailed mitigation activities are effective risk reduction measures that reasonably balance cost against the potential risk of not taking such measures.

Subject Area 4

Subject Area 4: Demonstration of outreach efforts to regional, state, and local entities, including municipalities regarding a protocol for the de-energization of power lines and

³ BV’s Subject Area 2 aligns with OAR 860-300-002(1)(b)

*adjusting power system operations to mitigate wildfire, promote the safety of the public and first responders and preserve health and communication infrastructure.*⁴

While BV's Subject Area 4 is largely representative of the rule language, there is a crucial difference. The rule language states that the utility's WMP will include a "discussion of outreach efforts to regional, state, and local entities." In contrast, BV's evaluation notes that the utility should include a "demonstration" of such outreach. The Company feels strongly that these words are not interchangeable.

Within this section, BV notes that Idaho Power did not demonstrate compliance with "[providing] geographical boundary of impacted areas of the service territory that may be affected by a PSPS event or modified power system operations." BV is accurate in its assessment, but the Company would point out that this language is a significant departure from the actual requirement.

Idaho Power believes it provided a thorough and complete Public Safety Power Shutoff ("PSPS") plan in accordance with the rule requirement. Efforts to discuss the Company's de-energization/PSPS protocols with Public Safety Partners in Eastern Oregon had commenced at the time of BV's outreach, but had not been completed. These outreach activities will continue through the Spring and then evolve on an on-going basis. Again, Idaho Power would note that the WMP is a forward-looking document and was not intended nor written as a compliance document to reflect activities the Company had already performed.

Subject Area 7

*Subject Area 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.*⁵

BV's draft report states that Idaho Power did not meet two of four detailed metrics in Subject Area 7: First, "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." And second: "Explanation of logic/reasoning in selected inspection practices in wildfire risk areas."

Idaho Power believes its filed WMP fully accounts for the rule requirements. Chapter 6 of the Company's Plan addresses field personnel practices (i.e., procedures and standards). Chapter 7 of the WMP details transmission and distribution ("T&D") line operational strategies, including specific operational procedures in Red and Yellow Risk Zones. Chapter 8 of the WMP

⁴ BV's Subject Area 4 relates to OAR 860-300-002(1)(d).

⁵ BV's Subject Area 7 aligns with OAR 860-300-002(1)(f).

details the Company's extensive wildfire mitigation activities, including asset management programs that address inspection procedures and protocols.

While BV's metrics in this subject area are items that the Company could consider in future years to bolster the detail of its Plan, the Company again would note that these metrics are a significant departure from the rule language itself. The Company is confident that it has met in full the specific rule in question.

Subject Area 8

Subject Area 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.⁶

Chapter 8.3 of Idaho Power's WMP details the Company's T&D vegetation management practices. This information includes discussion of procedures, standards, and timeframes. The Company considers itself fully responsive to the rule language related to vegetation management.

BV, however, notes that the Company did not provide "explanation of logic/reasoning in selected management practices in wildfire risk areas." The Company did not provide such reasoning because that language is not present or implied in the rules. To be certain, the Company's vegetation management plan is based on sound logic, industry best practices, and considerable lessons learned and experience in vegetation management. Idaho Power can provide such backward-looking reasoning in future WMPs should the Commission consider that background vital to the Company's Plan. This discussion, however, seems best suited to a cost deferral or cost recovery filing, in the Company's estimation.

Subject Area 9

Subject Area 9: Identification of the development, implementation, and administrative costs for the plan, which includes a discussion of risk-based cost and benefit analysis, including consideration of technologies that offer co-benefits to the utility's system.⁷

Chapters 3 and 4 of Idaho Power's WMP address the quantification of wildfire risk and the benefits of wildfire mitigation activities, respectively. The Company considered the broad discussion of cost-benefit and the following detailed chapters on mitigation activities sufficient for addressing the cost-related sections of the rules.

⁶ BV's Subject Area 8 aligns with OAR 860-300-002(1)(g).

⁷ BV's Subject Area 9 aligns with OAR 860-300-002(1)(h).

However, the Company understands that BV considers this an especially lacking area in the Company's Plan. To address this concern, the Company has attached to these comments cost tables of estimated incremental WMP and PSPS expenses from 2022-2025. These cost tables have been included in the Company's WMP as an additional appendix.

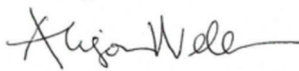
CONCLUSION

In summary, the Company believes it developed a comprehensive WMP for the 2022 wildfire season. The elements of the Plan address each of the requirements established in AR 638 and codified in OAR 860-300-002. Additionally, the Company has modified its Plan to include a cost table of incremental wildfire mitigation and PSPS-related expenditures.

The Company would note once more that BV's draft report offered a host of helpful suggestions for the future. But for the matter at hand—acceptance of the Company's Plan in accordance with OAR 860-300-002 for inaugural utility wildfire plans—BV's detailed metrics should be considered with caution. If these detailed metrics are expected to guide the development of future WMPs, the metrics themselves should be introduced into the final phase of AR 638 to ensure due process and consideration.

Idaho Power would like to reaffirm its commitment to robust and effective wildfire mitigation. The Company is proud of the Plan it has developed and believes it effectively mitigates risk and protects its customers. The Company looks forward to further discussions in this matter.

Respectfully Submitted,



Alison Williams
Regulatory Policy & Strategy Advisor
Idaho Power

cc: OPUC Filing Center

**Appendix C: Forecast of Idaho Power System Incremental Operations and Maintenance (O&M) and Capital Expenditures for Wildfire Mitigation and Public Safety Power Shutoff (PSPS) Expenditures (2022-2025)
March 11, 2022**

Idaho Power's forecast of incremental O&M and capital expenditures for wildfire mitigation and PSPS activities are based on total system estimates. Cost assignment between the Company's Idaho and Oregon service areas will be based on work performed that may be specific to one of the two service areas and an allocation of system costs based on the Company's jurisdictional separation amounts as determined through its Jurisdictional Separation Studies.

Forecast of Idaho Power System Incremental O&M Expenditures (\$000s)					
	2022	2023	2024	2025	2022 - 2025
Quantifying Wildland Fire Risk					
Risk Map Updates	\$ -	\$ 67	\$ -	\$ 69	\$ 136
Situational Awareness					
Weather Forecasting - Fire Potential Index (FPI) and Public Safety Power Shutoff (PSPS) Personnel	\$ 210	\$ 220	\$ 230	\$ 241	\$ 901
Weather Forecasting - System development and support	\$ 10	\$ 29	\$ 55	\$ 55	\$ 149
Pole Loading Modeling & Assessment (Contract service)	\$ 25	\$ 75	\$ -	\$ -	\$ 100
Cameras	\$ 50	\$ 55	\$ 113	\$ 50	\$ 268
Mitigation - Field Personnel Practices					
Mobile Weather Kits for Field Observers	\$ 20	\$ -	\$ -	\$ -	\$ 20
Tools/Equipment	\$ 5	\$ 5	\$ 5	\$ 5	\$ 20
Mitigation - Transmission & Distribution Programs					
Wildfire Mitigation Program Manager	\$ 180	\$ 185	\$ 190	\$ 195	\$ 750
O&M Component of Capital Work	\$ 54	\$ 61	\$ 60	\$ 54	\$ 229
Annual O&M T&D Patrol Maintenance Repairs	\$ 50	\$ 50	\$ 50	\$ 50	\$ 200
Environmental Management Practices	\$ 25	\$ 25	\$ 25	\$ 25	\$ 100
Transmission Thermography Inspection Mitigation - Red Risk Zones	\$ 20	\$ 20	\$ 20	\$ 20	\$ 80
Distribution Thermography Inspection Mitigation - Red Risk Zones	\$ 30	\$ 30	\$ 30	\$ 30	\$ 120
Thermography Technician Personnel	\$ 155	\$ 160	\$ 165	\$ 170	\$ 650
Transmission Wood Pole Fire Resistant Wraps - Red Risk Zone	\$ 88	\$ 88	\$ -	\$ -	\$ 176
Transmission Wood Pole Fire Resistant Wraps - Yellow Risk Zone	\$ 163	\$ 163	\$ 163	\$ 163	\$ 652
Covered Wire Evaluation - Pilot Program in PSPS Zones	\$ 25	\$ 50	\$ 50	\$ -	\$ 125
Vegetation Management					
Vegetation Mgmt Incremental Expense to Transition to/Maintain 3-yr cycle Line Clearing Program	\$ 8,087	\$ 8,796	\$ 9,547	\$ 8,372	\$ 34,802
Vegetation Distribution Red & Yellow Risk Zone: Pre-Fire Season Patrols/Mitigation, Pole Clearing, Removals, Work QA	\$ 1,223	\$ 1,284	\$ 1,349	\$ 1,416	\$ 5,272
Line Clearing Personnel	\$ 155	\$ 159	\$ 164	\$ 169	\$ 647
Communications					
Wildfire/Wildfire Mitigation Communications - Advertisements/Meetings/Other	\$ 100	\$ 100	\$ 100	\$ 100	\$ 400
PSPS Customer Education/Communication - Advertisements, Bill Inserts/Other	\$ 71	\$ 71	\$ 71	\$ 71	\$ 284
Information Technology					
Communication/Alert Tool development (System set up, outage maps, critical facilities identification)	\$ 163	\$ -	\$ -	\$ -	\$ 163
Communication/Alert Tool for PSPS Customer Alerts/Extended Use	\$ 141	\$ 129	\$ 129	\$ 129	\$ 528
Forecast Incremental O&M Expenditures Total	\$ 11,050	\$ 11,822	\$ 12,516	\$ 11,384	\$ 46,772

Forecast of Idaho Power System Estimated Capital Expenditures (\$000s)					
Capital Expenditures	2022	2023	2024	2025	2022 - 2025
Distribution	\$ 5,017	\$ 5,632	\$ 5,589	\$ 5,005	\$ 21,243
Transmission Projects	\$ 122	\$ 3,385	\$ 193	\$ 4,233	\$ 7,933
Forecast Incremental Capital Expenditures Total	\$ 5,139	\$ 9,017	\$ 5,782	\$ 9,238	\$ 29,176