

Independent Evaluator Report on Wildfire  
Mitigation Plan Compliance  
Bureau Veritas North America, Inc.  
Idaho Power



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VERITAS**



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### Disclaimer

This report has been compiled through the process of observation and the review of provided documents. The report is intended to serve only as a guide to assist with achieving compliance with regulatory requirements instituted by the Oregon Public Utility Commission (OPUC) for an independent evaluation of Investor-Owned Utility providers Wildfire Mitigation Practices. Bureau Veritas North America, Inc. (BVNA) is not the designer, implementer, or owner of the Wildfire Mitigation Plan (WMP) and is not responsible for its content, implementation and/or any liabilities, obligations or responsibilities arising therein.

The report reflects only those conditions and practices which could be ascertained through observation at the time of evaluation. This report is limited to those items specifically identified herein or as may be further required by OPUC at the time of the evaluation. The report does not represent those dangers, hazards and/or exposures do not in fact exist. BVNA shall only be responsible for the performance of the services identified or defined in our specific scope of services.

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## INTRODUCTION

### BACKGROUND

Under Senate Bill 762 (2021) and Oregon Administrative Rules (OAR) Chapter 860, Division 300 -Wildfire Mitigation Plans, which includes rules 860-024-0018, 860-300-0020, 860-300-0030, 860-300-0040 amended effective September 22, 2022, per PUC 6-2022. Per Orders, No. 22-131, No.22-132, and No. 22-133, effective April 28, 2022, the filed 2023 Wildfire Mitigation Plan(WMP) for the following public utilities in the State of Oregon was approved by Oregon Public Utility Commission (OPUC):

- PACIFICORP, dba PACIFIC POWER - Docket No: UM 2207
- PORTLAND GENERAL ELECTRIC COMPANY - Docket No: UM 2208
- IDAHO POWER COMPANY - Docket No: UM 2209

Additionally, the OPUC directed the three public utilities to engage with OPUC Staff and stakeholders through a workshop process prior to filing its 2023 Plan. The OPUC and Bureau Veritas North America, Inc. (BVNA), who has been selected as an Independent Evaluator (IE) by the OPUC, evaluated the 2023 WMPs and served as an Expert Witness to provide written testimony on the plan’s conformance to the State’s requirements.

### SCOPE

Pursuant to the OPUC’s Final IE Scope of Work (SOW) for the Utility Expert Witness, BVNA, in partnership with C2 Group, has reviewed Pacific Power’s 2023 Wildfire Mitigation Plan to verify compliance with the minimum requirements outlined in OAR 860-024-0018, 860-300-020, 860-300-0040, 860-300-0050, 860-300-0070 as summarized in Table 1 below.

**Table 1: Wildfire Mitigation Plans and Updates**  
**Minimum Requirements as set forth in Section 3(2)(a)-(h), chapter 592, Oregon Laws 2021**  
**Senate Bill 762 (2021) and OAR 860-300**

OAR 860-024-0018, 860-300-020, 860-300-0040, 860-300-0050, 860-300-0070	ID	Wildfire Mitigation Plan Requirements
(1)(a)(A) & (B)	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 generation and transmission assets.

(1)(b)	2	Identified means of mitigating wildfire risk that reflects a reasonable balancing of mitigation costs with the resulting reduction of wildfire risk.
(1)(c)	3	Identified preventative actions and programs that the Public Utility will carry out to minimize the risk of utility facilities causing wildfire.
(1)(d)	4	Discussion 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.
(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 through 860-300-0050.
(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.
(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.
(1)(h)	8	Description of the procedures, standards, and time frames that the Public Utility will use to carry out vegetation management in in areas the Public Utility identified as heightened risk of wildfire, consistent with OAR 860-024-0018.
(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.
(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.
(1)(k)	11	Description of ignition inspection program, 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

on pole attachments.

Idaho Power provides electric service to approximately 600,000 customers throughout a 24,000 square mile area in southern Idaho and eastern Oregon. The Oregon service territory is continuous and smaller than the Idaho portion of the service territory. Idaho Power overhead electric assets in total include (Oregon line-miles not provided separately in the WMP):

- Approximately 4,800 line-miles of overhead transmission lines
- Approximately 19,300 line-miles of overhead distribution circuits

Idaho Power has designated portions of their Oregon service territory as Tier 2 Wildfire Risk Zones, or Yellow Risk Zones (YRZ), locations with a heightened relative risk of catastrophic wildfires and started the implementation of wildfire mitigation measures for those areas as outlined in their WMP. Idaho Power has designated portions of their Idaho service territory as Tier 3 Wildfire Risk Zones, or Red Risk Zones (RRZ), locations of higher risk, as well as YRZs. Idaho Power did not provide line-miles of overhead electric assets in Oregon in YRZs in the WMP.



**Figure 1:** Map of Idaho Power’s Service Territory

In part, driven by climate change, the Western United States continues to experience an unprecedented number of catastrophic wildfires, many reaching higher and typically wetter elevations, and climate forecasts suggest this to be a continuing trend. These effects and trends have affected Idaho Power's service area and they developed the 2023 Oregon WMP to outline and guide mitigation strategies to reduce the probability of utility-related wildfires. The plan's timeline, specific objectives, and key deliverables are covered within Idaho Power's WMP. The following includes a comprehensive review and assessment of Idaho Power's 2023 Oregon WMP by the OPUC's IE.

### Key Recommendations

The IE conducted a compliance review of Idaho Power's 2023 WMP by examining the information provided in the plan and comparing it to the plan requirements set forth in Senate Bill 762 and OAR 860-300.

Assessments of the WMP sections were made following the Utility Expert Witness final SOW and further guided by BVNA's "Expectation of Demonstrated Compliance" matrix, which identifies detailed criteria for each plan-required topic to guide the WMP evaluation.

The majority of the WMP sections appeared to be in compliance and adhere to the requirements listed above in Table 1. A summarization of the IE's key recommendations is demonstrated below:

- The IE recommends that for future WMPs, Idaho Power include details of the analysis completed for establishing the risk tiers, and the threshold values utilized for classifying the YRZs and RRZs. It is suggested that Idaho Power also provide more information on who from Idaho Power or other organizations validated and reviewed the tier boundaries/zones and will be involved in reviewing the information annually.
- The IE also recommends that for future WMPs, Idaho Power include information on the analysis completed to identify the relative risk of overhead asset components, such as specific wire types and equipment, and how that information is being used to guide programmatic decisions, including budgets.
- The IE recommends that for future WMPs, more detail be provided regarding the process and timing that will be followed to evaluate the established YRZs and RRZs on an annual basis and the information clearly depict the established risk zone in Oregon and its bordered lands.
- The IE recommends that for future WMPs, Idaho Power continue to include the analysis of comparing measured risk reduction of plan activities to their costs, a cost-benefit analysis.
- The IE also recommends that for future WMPs, Idaho Power continue to include a description of how the overall effectiveness of the plan activities will be measured, as well as information on wildfires in the service territory for the prior year.
- The IE recommends that for future WMPs, Idaho Power continue to explore industry-wide preventative measures implemented to reduce the risk of wildfire and include a description of future planning efforts to implement some of those measures.
- Additionally, IE recommends that for future WMPs, Idaho Power correlates the preventative actions taken across the various sections of the WMP and quantify Idaho Power's overall preventative actions and their compound effectiveness in reducing wildfire risk.
- The IE recommends that for future WMPs, Idaho Power provide a clear map of what areas of the Oregon service territory may be affected by a PSPS event.
- The IE also recommends that Idaho Power to provide updates regarding engagement with Public Safety Partners, such as the list of specific organizations met with and the results of the outreach. It is also recommended to include input received that influenced the development of the WMP.

- The IE recommends that for future WMPs Idaho Power continue to include more information about the analysis completed to make their programmatic decisions of modifying system operations, in the RRZ and YRZs, specifically Oregon's YRZ. Without specific information included in the WMP, it is difficult to measure successes and procedure adjustments in future WMPs.
- The IE recommends that for future WMPs and existing utility website, information, including Geographic Information System(s) shapefiles depicting current boundaries of the area subject to de-energization, be made easily available to the external stakeholders including a public relation campaign highlighting this valuable resource. Currently, Idaho Power does not meet the requirements for OAR 860-300-0050 and OAR 860-300-0060. The IE recommends to vigorously work toward this goal.
- The IE recommends Idaho Power to provide additional information detailing the logistics behind standing up CRCs if a PSPS event were to occur.
- The IE recommends that for future WMPs, Idaho Power include the anticipated timelines and estimated customer reach for outreach activities, including but not limited to media campaigns, distribution of collateral to Community-Based Organizations and Public Safety Partners, and webinar or live wildfire safety and preparedness forums.
- The IE recommends that for future WMPs, Idaho Power provides a list of metrics developed to evaluate the effectiveness of community outreach efforts and discuss findings related to customer wildfire awareness.
- Idaho Power list all inspection activities described in the WMP in the summary of asset inspections by state and zone or identify where the activities are components of listed inspection types.
- Idaho Power identify whether defects correlated to a heightened fire ignition risk within Oregon's high-fire-risk zones are corrected per OAR 860-024-0018 (5)(b).
- Idaho Power identify whether annual fire season "safety patrols" are conducted in Oregon in accordance with OAR 860-024-0018 (4).
- Idaho Power expand the discussion of reasoning for selected inspection practices to include the evaluation of the effectiveness of inspection and correction activities from the ISO 31000 risk management process.
- Idaho Power identify QA/QC programs used to validate inspection and correction activities in wildfire risk areas, including procedures and quantity of inspections reviewed.
- After participating in deep dive sessions with Idaho Power, as well as reviewing their written responses to questions in the form of information requests, the IE recommends that for future WMPs Idaho Power will continue to clearly identify (using tables and illustrations as reference material) vegetation management practices and protocols for non-wildfire risk zones, vegetation management practices and protocols for RRZs, and vegetation management practices and protocols for YRZs, along with the impacted line-miles and structure counts for transmission and distribution assets in Oregon.
- The IE also recommends that for future WMPs Idaho Power continue to provide logic and details of analysis completed for their programming decisions in YRZs (and if any future RRZs) in Oregon regarding vegetation management practices and protocols.
- The IE recommends that for future WMPs, more detail be provided showing success in completing tasks outlined in OAR 860-024-0018. Details should include utilizing tables and illustrations describing each topic as well as status of each topic, whether abatement has occurred or a timeline when in compliance.

- Additionally, the IE recommends that for future WMPs, Idaho Power provide more information (in the form of tables and illustrations) regarding their quality control/quality assurance program and audits for vegetation management work completed in the RRZs, YRZs; measures employed, and resource types. It is also recommended that any analysis of historical events pertaining to Idaho Power lines, specific equipment type, vegetation and wildfires be provided that informed the program's design and its success factors.
- The IE recommends that for future WMPs Idaho Power continue to provide cost information as outlined in Table 10 to implement activities in Oregon included in the WMP to highlight future activities, especially in Oregon.
- The IE recommends providing a table identifying capital costs in future WMPs
- The IE recommends that for future WMPs Idaho Power continue to provide highlights of collaboration with industry channels, both information and knowledge shared from Idaho Power, and valuable information learned through the engagements.
- The IE also recommends that for future WMPs Idaho Power continue to provide details of the research and analysis they are completing for leading edge technologies and operational practices and the results of that research and analysis to highlight successes.
- The IE recommends that for future WMPs Idaho Power provide a list of conditions determined that could pose an ignition risk.
- The IE also recommends that for future WMPs Idaho Power provide a description of the procedures, standards, and training documents utilized by inspectors in the determination of ignition risks.

The following paragraphs provide a comparative analysis of Idaho Power's WMP and the minimum requirements as set forth in Section 3(2)(a)-(h), chapter 592, Oregon Laws 2021 Senate Bill 762 (2021) and OAR 860-300. This report considers all information demonstrated in Idaho Power's WMP, industry practices, and depicted regulation and further contains IE recommendations for future WMPs.

## INDEPENDENT EVALUATOR REVIEW OF COMPLIANCE

Each report section hereafter contains an evaluation of the WMP requirements, organized by subject, as listed in the order in Table 1. Noted as part of the IE's assessment, although Idaho Power's WMP does not follow the order of items as demonstrated in Table 1, Idaho Power provided Appendix C labeled Oregon Wildfire Requirements and Recommendations that provide reference to the corresponding location in their 2023 WMP.

Furthermore, the following terms are used in the Summary of Demonstrated Compliance table for each Subject Area to illustrate the plans completeness. These definitions are provided for the reader to understand the level of demonstrated compliance found within the plan:

**Met:** The term acknowledges that the utility has adequately demonstrated information in the plan that meets the requirements of the identified rule.

**Substantially Met:** The term indicates that the utility has largely but not wholly met the requirements of the rule.



**Partially Met:** The term indicates that the utility has to some extent or some degree has provided information within the plan that partially met or partially demonstrated the plans compliance with the rule. More information, clarity or detail is required to demonstrate the plans compliance with the rule.

**Not Met:** The term indicates that the utility has not provided any information or detail that addresses the requirements of the rule or is grossly understated.

## Wildfire Mitigation Plan Adherence to Requirements

**Subject Area 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.***

The IE utilized the following “Expectation of Demonstrated Compliance” descriptions to evaluate Subject Area 1 of the plan, which covers wildfire area risk mapping in Idaho Power’s service territory and rights-of-way.

- 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 of the service territory
- Describe analysis to both evaluate risk from the environment and specific utility asset types (if considered).
- Describe process that will be followed to evaluate areas on an annual basis.

### Review of Initiatives

Idaho Power with the help of a wildland fire computer modeling consultant identified areas of elevated wildfire risk in their Oregon service territory and rights-of-way and refer to the areas as “Risk Zones,” specifically Yellow Risk Zone (YRZ) and Red Risk Zone (RRZ) with red being the higher risk area. The risk analysis assesses and quantifies the threat of fire based upon risk-based methodology. This methodology is consistent with basic conventional risk by assessing wildfire risk based on fire probability and consequences. At a minimum, the assessment focuses on the potential impact in terms of harm to people and damage to property and uses various data sets, data sources and processes to complete the modeling.

The YRZ (Tier 2) and RRZ (Tier 3) were established after draft risk tiers were generated algorithmically by establishing threshold values. The risk tiers are reflective of relative risk to Idaho Power’s service territory only and not absolute risk. Idaho Power has included a wildfire risk assessment for the proposed Boardman to Hemingway Transmission Line and identified YRZ zones along the proposed route but have not identified higher risk RRZ areas.

### Demonstrated Compliance

Table 2 summarizes the findings of demonstrated compliance for Subject Area 1. One item is met, and two items are partially met.

Idaho Power describes the approach, data inputs, analysis completed, and industry standards used to identify high wildfire risk zones, however they do not provide specific information on how the zone threshold values were established, and why it was decided to create YRZs and RRZs (two tiers) to manage wildfire risk in their service territory.

Idaho Power did not provide any information regarding an analysis of the risk from specific utility asset types, and therefore this item is partially met.

Idaho Power did not provide details of the process and timing that will be followed to evaluate the established zones, and what data inputs and portions of the analysis will be reviewed annually, and therefore this item is partially met.

Idaho Power has been proactive in assessing future transmission line routes outside its service territory and has committed to evaluate risk mapping on an annual basis.

**Table 2: Subject Area 1 Summary of Demonstrated Compliance**

Description No.	Expectation of Demonstrated Compliance	Demonstrated Compliance
1	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.	Met
2	Describe analysis to both evaluate risk from the environment and specific utility asset types.	Partially Met
3	Describe process that will be followed to evaluate areas on an annual basis.	Partially Met

**Recommendations for Future WMPs**

The IE recommends that for future WMPs, Idaho Power include details of the analysis completed for establishing the risk tiers, and the threshold values utilized for classifying the YRZs and RRZs. It is suggested that Idaho Power also provide more information on who from Idaho Power or other organizations validated and reviewed the tier boundaries/zones and will be involved in reviewing the information annually.

The IE also recommends that for future WMPs, Idaho Power include information on the analysis completed to identify the relative risk of overhead asset components, such as specific wire types and equipment, and how that information is being used to guide programmatic decisions, including budgets.

The IE recommends that for future WMPs, more detail be provided regarding the process and timing that will be followed to evaluate the established YRZs and RRZs on an annual basis and the information clearly depict the established risk zone in Oregon and its bordered lands

**Subject Area 2: Identified means of mitigating wildfire risk that reflects a reasonable balancing of mitigation costs with the resulting reduction of wildfire risk.**

The IE utilized the following “Expectation of Demonstrated Compliance” descriptions to evaluate Subject Area 2 of the plan, which covers wildfire risk mitigation and the balance of cost with wildfire risk reduction.

- 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.
- Describe how the effectiveness of the activities will be measured or have been measured.

**Review of Initiatives**

Idaho Power details their main risk mitigation activities and associated costs to reduce fire risk in Section 4.4 of their 2023 WMP. Although some activities describe how they reduce risk, more information should be provided to explain how the effectiveness of each activity is to be measured and evaluated for future WMP implementation or modifications. The information obtained from the activity evaluation will assist in determining how well the utility’s identified activities balance cost with the effectiveness of reducing fire risk.

The 2023 WMP does not provide a history of wildfires in Idaho Power’s service territory, and the subset of those wildfires that were identified as being caused by Idaho Power utility assets, instead involved a review of prior major fires in other states. A complete baseline description of recent wildfire history is not included to provide context to assist in measuring the value of the risk reduction investments.

**Demonstrated Compliance**

Table 3 summarizes the findings of demonstrated compliance for Subject Area 2.

**Table 3: Subject Area 2 Summary of Demonstrated Compliance**

Description No.	Expectation of Demonstrated Compliance	Demonstrated Compliance
1	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.	Partially Met
2	Describe how the effectiveness of the activities will be measured or have been measured.	Partially Met

**Recommendations for Future WMPs**

The IE recommends that for future WMPs, Idaho Power continue to include the analysis of comparing measured risk reduction of plan activities to their costs, a cost-benefit analysis.

The IE also recommends that for future WMPs, Idaho Power continue to include a description of how the overall effectiveness of the plan activities will be measured, as well as information on wildfires in the service territory for the prior year.

**Subject Area 3: *Identified preventative actions and programs that the Public Utility will carry out to minimize the risk of utility facilities causing wildfire.***

The IE utilized the following “Expectation of Demonstrated Compliance” descriptions to evaluate Subject Area 3 of the plan, which covers the preventative actions and programs that the Public Utility carries out to reduce the wildfire risk.

- Describe preventative actions that are specific to reducing the risk and exposures to wildfire, and the measurable improvements, risk reductions, or quantitative results from the preventative actions or programs.

**Review of Initiatives**

Idaho Power provides an overview of preventative actions and programs planned to reduce wildfire risk in its WMP. Idaho Power has shown the two-tier map for Tier 2 and Tier 3 wildfire risk zones across its entire territory in Oregon and Idaho and listed the breakdown of both transmission and distribution lines per tier. Specific measurable/quantitative preventative actions are identified in the WMP activity summary under the categories System Hardening and Feeder Segmentation. Other preventative actions to reduce the wildfire risk are covered under Idaho Power’s various initiatives for situational awareness, inspection and correction programs, and vegetation management and leading-edge technologies, as detailed in Subject Areas 2, 7, 8, and 10.

**Demonstrated Compliance**

Table 4 summarizes the findings of demonstrated compliance for Subject Area 3.

**Table 4: Subject Area 3 Summary of Demonstrated Compliance**

Description No.	Expectation of Demonstrated Compliance	Demonstrated Compliance
1	Describe preventative actions that are specific to reducing the risk and exposures to wildfire, and the measurable improvements, risk reductions, or quantitative results from the preventative actions or programs.	Substantially Met

**Recommendations for Future WMPs**

The IE recommends that for future WMPs, Idaho Power continue to explore industry-wide preventative measures implemented to reduce the risk of wildfire and include a description of future planning efforts to implement some of those measures.

Additionally, IE recommends that for future WMPs, Idaho Power correlates the preventative actions taken across the various sections of the WMP and quantify Idaho Power's overall preventative actions and their compound effectiveness in reducing wildfire risk.

**Subject Area 4: *Discussion 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.***

The IE utilized the following “Expectation of Demonstrated Compliance” descriptions to evaluate Subject Area 4 of the plan, which covers outreach to regional, state, and local entities regarding protocols for de-energizing power lines and adjusting power system operations.

- Provide geographical boundary of impacted areas of the service territory that may be affected by a PSPS event or modified power system operations.
- 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.

#### **Review of Initiatives**

Idaho Power conducts outreach to Public Safety Partners focused on wildfire awareness, prevention, and outage preparedness. Outreach efforts include annual meetings, WMP and PSPS plan presentations, and functional exercises. The WMP includes a summary of the feedback received from Public Safety Partners that Idaho Power will consider when updating its plan. In addition, Idaho Power outlines its strategy to activate Community Resource Centers for PSPS events in collaboration with local Public Safety Partners.

Idaho Power addressed the OPUC staff recommendations and included them in the 2023 WMP; however, the IE noted the following:

- Idaho Power did not include the timing or method of notification for local emergency management partners in its strategy for activating Community Resource Centers.
- Although Idaho Power included a map showing areas at higher risk for PSPS in the PSPS Program in Appendix B, they did not depict the locations of the PSPS events on the map.
- Idaho Power identified that a list of specific contacts with Public Safety Partners is available upon request.

#### **Demonstrated Compliance**

Table 5 summarizes the findings of demonstrated compliance for Subject Area 4.

The geographical boundary of the areas within the service territory in Oregon that have an increased likelihood to be affected by a PSPS event is not explicitly outlined in the WMP. Idaho Power has identified that PSPS zones exist within the service territory in Idaho but not in Oregon in WMP workshops and responses to data requests.

**Table 5: Subject Area 4 Summary of Demonstrated Compliance**

Description No.	Expectation of Demonstrated Compliance	Demonstrated Compliance
1	Provide geographical boundary of impacted areas of the service territory that may be affected by a PSPS event or modified power system operations.	Met
2	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.	Met

**Recommendations for Future WMPs**

The IE recommends that for future WMPs, Idaho Power provide a clear map of what areas of the Oregon service territory may be affected by a PSPS event.

The IE also recommends that Idaho Power to provide updates regarding engagement with Public Safety Partners, such as the list of specific organizations met with and the results of the outreach. It is also recommended to include input received that influenced the development of the WMP.

***Subject Area 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 through 860-300-0050.***

The IE utilized the following “Expectation of Demonstrated Compliance” descriptions to evaluate Subject Area 5 of the plan, which covers protocols for de-energizing power lines and adjusting power system operations.

- Overview of steps completed by the utility leading up to a PSPS and closing a PSPS event.
- 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.
- Description of adjusted power system operations to mitigate wildfire, and description of operations in non-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.
- 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.

## Review of Initiatives

Idaho Power will initiate a PSPS based on several factors including but not limited to Fire Potential Index, National Weather Service (NWS) Red Flag Warnings, NWS fire weather forecasts, publicly available weather models and Idaho Power’s internal weather model. Idaho also coordinates with several agencies including Boise NWS fire forecasters and NIFC Predictive Service Forecasters, U.S. BLM and the U.S. Forest Service.

Idaho Power has a series of defined steps and decision points documented to follow for deciding when to initiate a Public Safety Power Shutoff (PSPS), including individuals and departments who are involved with the steps and decisions. Standard notification timelines have also been established for de-energization warnings and re-energization estimated completion.

OAR 860-300-0050 (A) refers to providing Geographic Information System(s) shapefile(s) depicting current boundaries of the area subject to de-energization. Although Idaho provides steps they will take before, during and after a PSPS event, the IE was unable to find information describing their website and links to shape files identifying a potential PSPS zones.

## Demonstrated Compliance

Table 6 summarizes the findings of demonstrated compliance for Subject Area 5.

Idaho Power does provide information of the analysis completed to make the programmatic decisions included in the WMP for adjusted power system operations. Examples include utilizing their Fire Potential Index (FPI), National Weather Service Fire Weather Forecasts and Red Flag Warning System, Idaho Power’s Internal Weather Model as well as coordinated meeting with emergency management entities.

If a PSPS event were to occur, there is little information on the logistics behind setting up CRCs for affected community members as well as a training component to staff a CRC.

**Table 6: Subject Area 5 Summary of Demonstrated Compliance**

Description No.	Expectation of Demonstrated Compliance	Demonstrated Compliance
1	Overview of steps completed by the utility leading up to a PSPS and closing a PSPS event.	Met
2	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.	Met
3	Description of adjusted power system operations to mitigate wildfire, and description of operations in non-	Substantially Met

	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.	
4	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.	Met

### Recommendations for Future WMPs

The IE recommends that for future WMPs Idaho Power continue to include more information about the analysis completed to make their programmatic decisions of modifying system operations, in the RRZ and YRZs, specifically Oregon’s YRZ. Without specific information included in the WMP, it is difficult to measure successes and procedure adjustments in future WMPs.

The IE recommends that for future WMPs and existing utility website, information, including Geographic Information System(s) shapefiles depicting current boundaries of the area subject to de-energization, be made easily available to the external stakeholders including a public relation campaign highlighting this valuable resource. Currently, Idaho Power does not meet the requirements for OAR 860-300-0050 and OAR 860-300-0060. The IE recommends to vigorously work toward this goal.

The IE recommends Idaho Power to provide additional information detailing the logistics behind standing up CRCs if a PSPS event were to occur.

***Subject Area 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.***

The IE utilized the following “Expectation of Demonstrated Compliance” descriptions to evaluate Subject Area 6 of the plan, which covers community outreach and public awareness efforts before, during, and after wildfire season.

- Detailed description of the Wildfire Mitigation Plan Engagement Strategy identifying planned forums and opportunities for follow up along with a description of the design considerations for inclusivity and accessibility.
- Detailed description of community outreach and public awareness efforts: content and messaging of outreach and communication, media platforms used to disseminate information, frequency of outreach, equity considerations. Description of metrics used to track and report the effect of community outreach and public awareness efforts.

### Review of Initiatives



Idaho Power includes a description of the strategy for communication about wildfires and community outreach. Idaho Power plans to distribute information regarding its WMP to customers via tools including, but not limited to, fact sheets, mass media, community presentations, newsletters, social media, and the Idaho Power website. Examples of communications sent in 2022 have been included, along with a 2022 WMP communication summary identifying outlets used for communications, updates to the Idaho Power Website, and details of additional outreach efforts.

In addition, high-level discussion is included of the timing of outreach efforts in 2022 and adjustments designed to increase the campaign's effectiveness. Finally, Idaho Power summarizes metrics related to the 2022 paid communication campaign.

### Demonstrated Compliance

Table 7 summarizes the findings of demonstrated compliance for Subject Area 6.

Idaho Power outlines the high-level methods of outreach supplemented with examples of communications from 2022, discussion of the timing of 2022 outreach campaign, and metrics related the paid advertising campaign; however, they do not provide details expected target audience for various methods of outreach, expected impact of outreach, details, numbers or reach of Community-Based Organization or Public Safety Partners to capture distribution range or footprint for cohesive understanding of (before, during and after wildfire season) efforts for maximum impact.

**Table 7: Subject Area 6 Summary of Demonstrated Compliance**

Description No.	Expectation of Demonstrated Compliance	Demonstrated Compliance
1	Detailed description of the Wildfire Mitigation Plan Engagement Strategy identifying planned forums and opportunities for follow up along with a description of the design considerations for inclusivity and accessibility.	Met
2	Detailed description of community outreach and public awareness efforts: content and messaging of outreach and communication, media platforms used to disseminate information, frequency of outreach, equity considerations.	Partially Met
3	Description of metrics used to track and report the effect of community outreach and public awareness efforts.	Partially Met

### Recommendations for Future WMPs

The IE recommends that for future WMPs, Idaho Power include the anticipated timelines and estimated customer reach for outreach activities, including but not limited to media campaigns, distribution of collateral to Community-Based Organizations and Public Safety Partners, and webinar or live wildfire safety and preparedness forums.

The IE recommends that for future WMPs, Idaho Power provides a list of metrics developed to evaluate the effectiveness of community outreach efforts and discuss findings related to customer wildfire awareness.

**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, consistent with OAR 860-024-0018.***

The IE utilized the following “Expectation of Demonstrated Compliance” descriptions to evaluate Subject Area 7 of the plan, which covers utility infrastructure inspections and corrections in the areas Idaho Power identified as high wildfire risk.

- Description of procedures and standards utilized to guide inspection activities in wildfire risk areas.
- 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.
- Explanation of logic/reasoning in selected inspection practices in wildfire risk areas.

#### Review of Initiatives

Idaho Power employs several methods to inspect overhead assets. For transmission structures, the following methods are used:

- Annual aerial visual inspections, by helicopter, for transmission lines identified as Western Electricity Coordinating Council (WECC) Path Lines and lines in RRZs. This type of inspection is not listed in Table 8 “Summary of asset inspections and schedules by state and zone” and it is unclear from the WMP if this type of inspection applies to any transmission structures in Oregon.
- Annual ground visual inspections, by using four-wheel-drive vehicles, all-terrain vehicles, utility terrain vehicles, and/or by foot.
- Detailed visual (high-resolution photography) inspections, by helicopter or unmanned aerial vehicles, performed every 10 years.
- Wood pole inspection and treatment program, by foot, every 10 years.
- Cathodic protection and inspection program, by foot, every 10 years, on select transmission towers with either an impressed current corrosion protection system (ICCP) or direct-buried sacrificial magnesium anodes. This type of inspection is not listed in Table 8 “Summary of asset inspections and schedules by state and zone” and it is unclear from the WMP if the protocol and frequency for this type of inspection varies from non-YRZs and YRZs.
- Thermal imaging (infrared) inspections, of lines and equipment that is being specifically expanded to include the RRZs.

For distribution structures, the following methods are used:

- Annual ground detailed visual inspections using four-wheel-drive vehicles, all-terrain vehicles, utility terrain vehicles, and/or by foot for distribution lines in the RRZs. It needs to be clarified

from the WMP if this type of inspection applies to any distribution structures in Oregon, and if it only applies to RRZs, what the detailed inspection protocol is for YRZs.

- Wood pole inspection and treatment program, by foot, every 10 years.
- For annual line equipment inspections of distribution system protection line equipment by line operations technicians, this type of inspection is not listed in Table 8 “Summary of asset inspections and schedules by state and zone,” and it is unclear from the WMP if the protocol and frequency for this type of inspection varies from non-YRZs and YRZs.

Defects found during inspections are classified as Priority 1, 2, or 3. Priority 1 defects may require reporting and repair as soon as reasonably practicable. Priority 2 defects require correction action within 24 months of identification. Priority 3 defects do not pose a threat and are monitored. It is unclear if defects identified in Oregon YRZs that correlate to a heightened risk of fire ignition are corrected in accordance with OAR 860-024-0018 (5)(b).

### Demonstrated Compliance

Table 8 summarizes the findings of demonstrated compliance for Subject Area 7.

Idaho Power describes inspection activities and correction protocols for overhead transmission and distribution assets and provides a table with a summary of asset inspections and schedules by state and zone; however, several inspection activities are not listed in the table or identified as components of the listed activities.

Idaho Power does not identify clearly that defects correlated with a heightened risk of fire ignition are corrected in accordance with OAR 860-024-0018 (5)(b).

It is unclear whether annual fire season "safety patrols" for distribution assets are conducted in Oregon YRZs in accordance with OAR 860-024-018 (4).

**Table 8: Subject Area 7 Summary of Demonstrated Compliance**

Description No.	Expectation of Demonstrated Compliance	Demonstrated Compliance
1	Description of procedures and standards utilized to guide inspection activities in wildfire risk areas.	Met
2	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.	Partially Met
3	Explanation of logic/reasoning in selected inspection practices in wildfire risk areas.	Met

### Recommendations for Future WMPs

The IE recommends the following for future Idaho Power WMPs:

- Idaho Power list all inspection activities described in the WMP in the summary of asset inspections by state and zone or identify where the activities are components of listed inspection types.
- Idaho Power identify whether defects correlated to a heightened fire ignition risk within Oregon's high-fire-risk zones are corrected per OAR 860-024-0018 (5)(b).
- Idaho Power identify whether annual fire season "safety patrols" are conducted in Oregon in accordance with OAR 860-024-0018 (4).
- Idaho Power expand the discussion of reasoning for selected inspection practices to include the evaluation of the effectiveness of inspection and correction activities from the ISO 31000 risk management process.  
Idaho Power identify QA/QC programs used to validate inspection and correction activities in wildfire risk areas, including procedures and quantity of inspections reviewed.

**Subject Area 8: *Description of the procedures, standards, and time frames that the Public Utility will use to carry out vegetation management in in areas the Public Utility identified as heightened risk of wildfire, consistent with OAR 860-024-0018.***

The IE utilized the following "Expectation of Demonstrated Compliance" descriptions to evaluate Subject Area 8 of the plan, which covers vegetation management procedures, standards and timeframes in the areas Idaho Power identified as high wildfire risk.

- 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).
- 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).
- Explanation of logic/reasoning in selected vegetation management practices in wildfire risk areas.
- Description of the process for reviewing practices and methods to ensure effectiveness with plan procedures.

### **Review of Initiatives**

Idaho Power employs several vegetation management activities for overhead assets. For transmission structures, the following methods are used:

- Annual transmission vegetation inspections are conducted aurally or by ground patrols, on "applicable transmission lines" in all Non-Risk Zones, Idaho and Oregon YRZs and Idaho RRZs. Valley cycle patrol/pruning is performed every three (3) years for all zones and every six (6) years in mountain locations. Additionally, cycle buster patrol/pruning is performed every eighteen (18) months in all zones.
- Transmission line clearing quality control and assurance is completed by a utility arborist or a third party contractor when line clearing work is required, and a line clearing audit form is completed and retained. 100% QA/QC is performed annually in Idaho and Oregon's YRZ and Idaho's RRZs. Sampling audits are taken for non-risk zones in Idaho and Oregon.

For distribution structures, the following methods are used:

- Distribution line clearing cycles are three years (Idaho Power is actively working towards achieving this cycle, which is shortened from the previous cycle). In RRZs and YRZs Idaho Power’s goal is to perform mid-cycle pruning in the second year.
- Distribution vegetation line inspections are conducted annually with mid-cycle pruning the second year by utility arborists for each distribution line in RRZs and YRZs.
- Distribution line clearing procedures include maintaining a target clearance between vegetation and conductors of five feet for lines energized at 600 volts through 50 kV, or three feet if the vegetation is not considered to be readily climbable.
- Distribution line clearing quality control and assurance is completed by a utility arborist or a third party contractor when line clearing work is required, and a line clearing audit form is completed and retained. 100% QA/QC is performed annually in Idaho and Oregon’s YRZ and Idaho’s RRZs. Sample audits are performed for non-risk zones in Idaho and Oregon.

Additionally, Idaho Power clears vegetation around the base of certain subject transmission wood poles and a limited number of distribution subject wood poles in Idaho. Idaho Power applied with the Oregon BLM Vale District Office to prepare an Environmental Assessment to use the same ground sterilant on transmission and distribution facilities in Oregon. It is unclear from the WMP how structures are selected for treatment, and how this procedure would apply to YRZs in Oregon if approved.

### Demonstrated Compliance

Table 9 summarizes the findings of demonstrated compliance for Subject Area 8.

Idaho Power does describe vegetation management activities and protocols for overhead transmission and distribution assets which include annual patrols and mitigation, mid-cycle patrols and pruning, hazard tree identified and pruned or removed and performs annual sampling audits.

**Table 9: Subject Area 8 Summary of Demonstrated Compliance**

Description No.	Expectation of Demonstrated Compliance	Demonstrated Compliance
1	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).	Met
2	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).	Met
3	Explanation of logic/reasoning in selected vegetation management practices in wildfire risk areas.	Partially Met
4	Description of the process for reviewing	Met

	practices and methods to ensure effectiveness with plan procedures.	
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### Recommendations for Future WMPs

After participating in deep dive sessions with Idaho Power, as well as reviewing their written responses to questions in the form of information requests, the IE recommends that for future WMPs Idaho Power will continue to clearly identify (using tables and illustrations as reference material) vegetation management practices and protocols for non-wildfire risk zones, vegetation management practices and protocols for RRZs, and vegetation management practices and protocols for YRZs, along with the impacted line-miles and structure counts for transmission and distribution assets in Oregon.

The IE also recommends that for future WMPs Idaho Power continue to provide logic and details of analysis completed for their programming decisions in YRZs (and if any future RRZs) in Oregon regarding vegetation management practices and protocols.

The IE recommends that for future WMPs, more detail be provided showing success in completing tasks outlined in OAR 860-024-0018. Details should include utilizing tables and illustrations describing each topic as well as status of each topic, whether abatement has occurred or a timeline when in compliance.

Additionally, the IE recommends that for future WMPs, Idaho Power provide more information (in the form of tables and illustrations) regarding their quality control/quality assurance program and audits for vegetation management work completed in the RRZs, YRZs; measures employed, and resource types. It is also recommended that any analysis of historical events pertaining to Idaho Power power lines, specific equipment type, vegetation and wildfires be provided that informed the program’s design and its success factors.

### ***Subject Area 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***

The IE utilized the following “Expectation of Demonstrated Compliance” descriptions to evaluate Subject Area 9 of the plan, which covers the cost to develop, implement and administer the WMP, risk-based cost and benefit analysis, and consideration of technologies that offer co-benefits.

- Summary of plan activities that are incremental costs to "baseline" utility operations.
- Two detailed tables, one for capital costs and one for expense (O&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 2023.
- 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.

### Review of Initiatives

In order to assess high level risk with respect to mitigation, Idaho Power hired an external consultant to assist with determining historical data on the cost of wildfire. An incremental O&M program was created which details all projects and the cost for each. Examples of the O&M program include quantifying risk,

situational awareness, mitigation using field personnel, transmission and distribution mitigation, vegetation management, communications and informational technology Idaho Power provides detailed information regarding the decision making process for planned O&M expenditures. Idaho Power provided detailed information on O&M expenditures, but the IE was unable to find a table detailing capital costs.

### Demonstrated Compliance

Table 10 summarizes the findings of demonstrated compliance for Subject Area 9.

**Table 10: Subject Area 9 Summary of Demonstrated Compliance**

Description No.	Expectation of Demonstrated Compliance	Demonstrated Compliance
1	Summary of plan activities that are incremental costs to "baseline" utility operations.	Substantially Met
2	Two detailed tables, one for capital costs and one for expense (O&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 2023.	Partially Met
3	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.	Met

### Recommendations for Future WMPs

The IE recommends that for future WMPs Idaho Power continue to provide cost information as outlined in Table 10 to implement activities in Oregon included in the WMP to highlight future activities, especially in Oregon.

The IE recommends providing a table identifying capital costs in future WMPs

**Subject Area 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 to develop and implement cost effective wildfire mitigation solutions.***

The IE utilized the following “Expectation of Demonstrated Compliance” descriptions to evaluate Subject Area 10 of the plan, which covers participation in workshops and forums, research, and analysis to maintain expertise in leading edge technologies and operational practices, and the application of the technologies and practices.

- 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).

- Research and analysis the utility is doing or has completed regarding leading edge technology and operational practices.
- Results of research and analysis of technology and operational practices that have been implemented into cost-effective wildfire mitigation solutions.

### Review of Initiatives

Idaho Power continues to participate in workshops with other utilities and regional and national industry collaboration channels around wildfire risk mitigation for utilities. Collaboration channels are listed in the WMP along with a summary of Industry and Peer Utility engagement including a discussion of the purpose for the engagements.

Idaho Power continues to research and analyze emerging technologies through their identified peer engagement activities. Examples include multiple technology vendor meetings, engaging with EPRI regarding UV products and innovations in risk modeling.

### Demonstrated Compliance

Table 11 summarizes the findings of demonstrated compliance for Subject Area 10.

**Table 11: Subject Area 10 Summary of Demonstrated Compliance**

Description No.	Expectation of Demonstrated Compliance	Demonstrated Compliance
1	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).	Met
2	Research and analysis the utility is doing or has completed regarding leading edge technology and operational practices.	Substantially Met
3	Results of research and analysis of technology and operational practices that have been implemented into cost-effective wildfire mitigation solutions.	Substantially Met

### Recommendations for Future WMPs

The IE recommends that for future WMPs Idaho Power continue to provide highlights of collaboration with industry channels, both information and knowledge shared from Idaho Power, and valuable information learned through the engagements.

The IE also recommends that for future WMPs Idaho Power continue to provide details of the research and analysis they are completing for leading edge technologies and operational practices and the results of that research and analysis to highlight successes.



**Subject Area 11: *Description of ignition inspection program, 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 on pole attachments.***

The IE utilized the following “Expectation of Demonstrated Compliance” descriptions to evaluate Subject Area 11 of the plan, which covers utility infrastructure ignition inspection programs in the areas Idaho Power identified as high wildfire risk. This evaluation was completed in conjunction with Subject Area 7.

- Detailed Information associated with the factors/values considered to support the inspector instruction for identification of ignition risks.
- Description of procedures, standards, or training documents used by inspectors to determine ignition risk conditions.

### Review of Initiatives

Idaho Power employs various initiatives for inspection and correction of identified conditions for transmission and distributions assets as detailed in Subject Area 7.

Discussion of the inspection and correction programs does not include identification of specific conditions that pose an ignition risk. Additionally, there is no description in the WMP of the procedures, standards, or training documents used by inspectors to determine ignition risk conditions. Idaho Power provided confirmation that inspectors completing ignition prevention inspections receive training in response to data request, however details of procedures, standards, and training documents were not included.

### Demonstrated Compliance

Table 12 summarizes the findings of demonstrated compliance for Subject Area 11.

**Table 12: Subject Area 11 Summary of Demonstrated Compliance**

Description No.	Expectation of Demonstrated Compliance	Demonstrated Compliance
1	Description of the conditions determined that could pose an ignition risk on utility equipment or pole attachments.	Not Met
2	Description of procedures, standards, and training documents utilized by inspectors in the determination of ignition risks.	Partially Met

### Recommendations for Future WMPs

The IE recommends that for future WMPs Idaho Power provide a list of conditions determined that could pose an ignition risk.

The IE also recommends that for future WMPs Idaho Power provide a description of the procedures, standards, and training documents utilized by inspectors in the determination of ignition risks.

## CONCLUSION

Idaho Power, in its second year of producing a Wildfire Mitigation Plan has provided a detailed description of their overhead electrical assets and their methodology for the designation of both Yellow Risk Zones (YRZ) and Red Risk Zones (RRZ) throughout their Idaho and Oregon service areas. Idaho Power has shown their commitment to providing a detailed WMP by engaging with wildfire professionals and fire and life safety consultants to provide an improved 2023 WMP and clear vision of their commitment to comply with OPUC Wildfire Mitigation Rules.

As the OPUC is developing rules for wildfire mitigation planning, new rules were implemented this year that were a result of the 2022 WMP assessment. Table 1 under the scope of this report depicts the application of the old and new rules to the current 2023 WMP and this report has provided terms (Met, Substantially Met, Partially Met, Not Met) to understand the level of demonstrated compliance found within the plan. Of these 30 new rules for the 2023 WMP, Idaho Power has showed some level of demonstrated compliance:

- Met 15
- Substantially Met 4
- Partially Met 10
- Not Met 1

As the independent evaluator, the level of improvement from the 2022 WMP assessment to the 2023 WMP assessment is clear and provides confidence that future WMP's will continue to show professionalism and improvements. Idaho Power has provided good momentum moving forward in redefining their actions associated with Oregon rules regarding WMP structures.

Bureau Veritas's overall conclusion is that Idaho Power has made changes to their WMP that demonstrates their efforts to reduce fire risks as required by OPUC's rules as narrated above in the recommendations. Idaho Power has proven to have taken a good step forward in their WMP processes and philosophies while understanding there is always room for improvement.

## APPENDIX

### **IOU Demonstration of Compliance Status Spreadsheet**

### Wildfire Mitigation Plan Evaluation Criteria

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	Idaho
(1)(a)(A) & (B)	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	<ul style="list-style-type: none"> <li>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.</li> <li>Describe analysis to both evaluate risk from the environment and specific utility asset types (if considered).</li> <li>Describe process that will be followed to evaluate areas on an annual basis.</li> </ul>	<b>Met</b> <b>Partially Met</b> <b>Partially Met</b>
(1)(b)	2	Identify means of mitigating wildfire risk that reflects a reasonable balancing of mitigation cost with the resulting reduction of wildfire risk.	<ul style="list-style-type: none"> <li>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.</li> <li>Describe how the effectiveness of the activities will be measured or have been measured.</li> </ul>	<b>Partially Met</b> <b>Partially Met</b>
(1)(c)	3	Identify preventative actions and programs that the Public Utility will carry out to minimize the risk of utility facilities causing wildfire.	<ul style="list-style-type: none"> <li>Describe preventative actions that are specific to reducing the risk and exposures to wildfire, and the measurable improvements, risk reductions, or quantitative results from the preventative actions or programs.</li> </ul>	<b>Substantially Met</b>
(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.	<ul style="list-style-type: none"> <li>Provide geographical boundary of impacted areas of the service territory that may be affected by a PSPS event or modified power system operations.</li> <li>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.</li> </ul>	<b>Met</b> <b>Met</b>
(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	<ul style="list-style-type: none"> <li>Overview of steps completed by the utility leading up to a PSPS and closing a PSPS event.</li> <li>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.</li> <li>Description of adjusted power system operations to mitigate wildfire, and description of operations in non-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.</li> <li>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.</li> </ul>	<b>Met</b> <b>Met</b> <b>Substantially Met</b> <b>Met</b>

(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, <b>consistent with OAR 860-300-0040 and OAR 860-300-0050.</b>	<ul style="list-style-type: none"> <li>Detailed description of the Wildfire Mitigation Plan Engagement Strategy identifying planned forums and opportunities for follow up along with a description of the design considerations for inclusivity and accessibility.</li> <li>Detailed description of community outreach and public awareness efforts: content and messaging of outreach and communication, media platforms used to disseminate information, frequency of outreach, equity considerations.</li> <li>Description of metrics used to track and report the effect of community outreach and public awareness efforts.</li> </ul>	<p><b>Met</b> <b>Partially Met</b> <b>Partially Met</b></p>
(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, <b>consistent with OAR 860-024-0018.</b>	<ul style="list-style-type: none"> <li>Description of procedures and standards utilized to guide inspection activities in wildfire risk areas.</li> <li>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.</li> <li>Explanation of logic/reasoning in selected inspection practices in wildfire risk areas.</li> </ul>	<p><b>Met</b> <b>Partially Met</b> <b>Met</b></p>
(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, <b>consistent with OAR 860-024-0018.</b>	<ul style="list-style-type: none"> <li>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).</li> <li>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).</li> <li>Explanation of logic/reasoning in selected vegetation management practices in wildfire risk areas.</li> <li>Description of the process for reviewing practices and methods to ensure effectiveness with plan procedures.</li> </ul>	<p><b>Met</b> <b>Met</b> <b>Partially Met</b> <b>Met</b></p>
(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.	<ul style="list-style-type: none"> <li>Summary of plan activities that are incremental costs to "baseline" utility operations.</li> <li>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 2023.</li> <li>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.</li> </ul>	<p><b>Substantially Met</b> <b>Partially Met</b> <b>Met</b></p>
(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	<ul style="list-style-type: none"> <li>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).</li> <li>Research and analysis the utility is doing or has completed regarding leading edge technology and operational practices.</li> <li>Results of research and analysis of technology and operational practices that have been implemented into cost-effective wildfire mitigation solutions.</li> </ul>	<p><b>Met</b> <b>Substantially Met</b> <b>Substantially Met</b></p>

(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.	<ul style="list-style-type: none"> <li>Detailed Information associated with the factors/values considered to support the inspector instruction for identification of ignition risks.</li> <li>Description of procedures and standards used to train inspectors in the determination of ignition risks.</li> </ul>	Not Met Partially Met
2	12	Wildfire Mitigation Plans must be updated annually and filed with the Commission no later than December 31 of each year. Public Utilities are required to provide a plan supplement explaining any material deviations from the applicable Wildfire Mitigation Plan acknowledged by the Commission. A Public Utility's initial Wildfire Protection Plan must be filed no later than December 31, 2021, per section 5, chapter 592, Oregon Laws 2021.	No expectation. From BV	
3	13	Within 180 days of submission, Wildfire Mitigation Plans and Wildfire Updates may be approved or approved with conditions through a process identified by the Commission in utility-specific proceedings, which may include retention of an Independent Evaluator (IE). For purposes of this section, "approved" means the Commission finds that the Wildfire Mitigation Plan or Update is based on reasonable and prudent practices including those the Public Utility identified through Commission workshops identified in SB 762, Section 2, and designed to meet all applicable rules and standards adopted by the Commission.	No expectation. From BV	
4	14	Approval of the Wildfire Mitigation Plan or Update does not establish a defense to any enforcement action for violation of a Commission decision, order or rule or relieve a Public Utility from proactively managing wildfire risk, including monitoring emerging practices and technologies.	No expectation. From BV	

Idaho

Total Subject Areas	30
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2023 WMP Level of Demonstrated Compliance	
Met	15
Sustantially Met	4
Partially Met	10
Not Met	1
	30

2022 WMP Level of Demonstrated Compliance (Comparison)	
Met	5
Sustantially Met	5
Partially Met	9
Not Met	9
	28