

**PUBLIC UTILITY COMMISSION OF OREGON
STAFF REPORT
SPECIAL PUBLIC MEETING DATE: April 21, 2022**

REGULAR X CONSENT _____ EFFECTIVE DATE _____ Upon Commission Approval

DATE: April 14, 2022

TO: Public Utility Commission

FROM: Lori Koho, Yassir Rashid, and Lisa Gorsuch

THROUGH: Bryan Conway **SIGNED**

SUBJECT: IDAHO POWER COMPANY:
(Docket No. UM 2209)
2022 Wildfire Mitigation Plan – Request for Commission Approval.

STAFF RECOMMENDATION:

Not approve Idaho Power’s 2022 Wildfire Mitigation Plan and direct the Company to submit a supplemental filing to bring the plan into compliance with applicable standards by June 28, 2022.

DISCUSSION:

Issue

Whether the Oregon Public Utility Commission (Commission) should not approve Idaho Power’s 2022 Wildfire Mitigation Plan and direct the Company to submit a supplemental filing to bring the plan into compliance with applicable standards by June 28, 2022.

Applicable Rule or Law

Per ORS 756.040, the Commission has authority to supervise and regulate every public utility in Oregon, and to do all things necessary and convenient in the exercise of such power and jurisdiction. Under ORS 756.060, the Commission may adopt reasonable and proper rules relative to all statutes administered by the Commission.

ORS 757.035(1) provides the Commission with the authority to adopt safety rules and Regulations.

Executive Order 20-04 (EO 20-04), Section 5(B)(4) directs the Commission to evaluate electric companies' risk-based wildfire protection plans and planned activities to protect public safety, reduce risks to utility customers, and promote energy system resilience in the face of increased wildfire frequency and severity, and in consideration of the recommendations made by the Governor's Council on Wildfire Response 2019 Report and Recommendations.

Senate Bill (SB) 762 (2021)¹ is a comprehensive bill, which established standards for electric utility Wildfire Mitigation Plans. Relevant sections of SB 762, specific to requirements to be included in electric utility Wildfire Protection Plans (Plans) and the requirement for the Commission to promulgate rules related to the requirements of those plans, have been incorporated in the Commission's statutes ORS 757.960 through 757.969.

Pursuant to ORS 757.963, the Commission may "approve with conditions" a public utility's Wildfire Mitigation Plan or update.

OAR 860-300-0020 articulates the minimum requirements for Wildfire Mitigation Plan filings, as well as the process for Commission approval of the plans.

Analysis

Background

On December 30, 2021, Idaho Power filed its risk-based Wildfire Mitigation Plan (WMP or Plan) with the Oregon Public Utility Commission (OPUC or Commission). Under Senate Bill 762 (2021) and Oregon Administrative Rule (OAR) 860-300-0020, public utilities in the State of Oregon must adopt and operate in compliance with an annually updated WMP that is filed with the Commission. Staff and Bureau Veritas North America, Inc. (BVNA), an Independent Evaluator (IE), have evaluated the 2022 Plan. BVNA was selected through a competitive bidding process to serve as an Expert Witness, to provide written testimony to assist in Staff's overall analysis and review of the Plan for rule compliance, and to make recommendations about Plan approval that may include conditions (i.e. future actions and/or additional requirements/updates for inclusion in upcoming year's Plan).

Staff's analysis, detailed below, considers Idaho Power's compliance with the Wildfire Mitigation Plan minimum requirements set forth in OAR 860-300-0020. The comments, recommended actions, and recommended additional requirements for inclusion in the Company's 2023 Plan reflect Staff's review of the Company's WMP, review of the IE's Report, review of Stakeholder Comments, and ongoing participation in WMP public

¹ Section 3, chapter 592, Oregon Laws 2021, available at [SB0762 \(oregonlegislature.gov\)](https://legislature.oregon.gov/bills/2021/SB0762).

workshops and Stakeholder engagement. In addition to written stakeholder comments, Staff and the IE consulted with emergency managers in some local jurisdictions to gain insight into perceptions by the local community of the effectiveness of the utility's community outreach efforts.

BVNA developed specific assessment criteria for evaluation of the utility WMPs. The criteria were, in many cases, more rigorous and detailed than the requirements in OAR 860-300-0020. These standards have provided a view into the components of a more robust Plan, but did not alter Staff's determination of compliance with the 2022 Plan requirements. Additionally, the IE used evaluation rankings of "Met," "Substantially Met," "Partially Met," and "Not Met." Staff did not adopt this ranking system. Staff's analysis resulted in a conclusion that the utility either met the requirement or didn't. However, in most cases, even when Staff determined the utility met the requirements of a specific requirement, Staff provided recommendations that will enhance the Company's future Plans and provide more evidence that the Company's Plan is risk based. Many of Staff's recommendations are based on or supported by recommendations made by the IE.

The IE's Report and stakeholder comments can be found in Docket No. UM 2209.²

Plan Compliance Review and Recommendations by Section

OAR 860-300-0020 (1)(a)(A) & (B):

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 utility, and (B) Outside the service territory of the utility but within the utility's right-of-way for generation and transmission assets.

Staff Analysis:

Idaho Power met this requirement by identifying areas subject to heightened risk of wildfire; however, its description of how it identifies those areas is lacking.

Idaho Power indicated that it utilized a risk-based approach to quantify wildfire risk in terms of probability and consequence of wildfires. Idaho Power used computer modeling to identify areas of elevated wildfire risk in their Oregon service territory and rights-of-way and classified areas with relative increased wildfire risk as Yellow Risk Zones (YRZs) and areas with higher increased wildfire risk Red Risk Zones (RRZs). 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.

² <https://apps.puc.state.or.us/edockets/DocketNoLayout.asp?DocketID=23112>.

Idaho Power indicated that it used modeling to establish threshold values, which, if exceeded, it would classify an area as Tier 2 or Tier 3. The increased wildfire risk tiers, Tier 2 and Tier 3, correspond to YRZ and RRZ respectively. However, it did not provide specific information on how these threshold values were established, and why it decided to create YRZs and RRZs (two tiers) to manage wildfire risk in their service territory. Idaho Power notes that wildfire risk its service territory is significantly lower than wildfire risk posed to utilities serving California.

Idaho Power indicated that it owns and operates 4,800 miles of overhead transmission lines and 19,300 overhead distribution lines. However, Idaho Power did not provide what proportion of its overhead facilities lie in increased wildfire risk zones.

Staff agrees with many of the IE's recommendations for providing more details for determining areas of high risk.

Stakeholder Comments:

STOP B2H Coalition provided the following as part of its overall commentary: "[Idaho Power Company (IPC)] did not identify any Wildfire Risk zones in eastern Oregon." STOP B2H Coalition also commented that it, "wished to have a better understanding of what information was gathered, how it was gathered and from who, how the data sets were created, and how those data sets derived the final numbers. STOP wanted to understand how these inputs were plugged into the formula, $\text{Wildfire Risk} = \text{Fire Probability} \times \text{Consequence}$, to develop the two-tier risk map."

Staff Recommendations for Idaho Power's 2023 Plan:

1. Idaho Power provide details regarding the mileage of overhead facilities that lie within its designated YRZs and RRZs.
2. Idaho Power provide details of the analysis completed for establishing the risk tiers and the threshold values utilized for classifying the YRZs and RRZs.
3. Idaho Power provide information regarding an analysis of the risk from specific utility asset types.
4. Idaho Power provide details of the process and timing that will be followed to evaluate the established heightened wildfire risk zones, and what data inputs and portions of the analysis will be reviewed annually.
5. Idaho Power address the concerns raised by STOP B2H Coalition as thoroughly as possible.

OAR 860-300-0020 (1)(b):

Identified means of mitigating wildfire risk that reflects a reasonable balancing of mitigation costs with the resulting reduction of wildfire risk.

Staff Analysis:

Idaho Power did not meet this requirement. Staff's conclusion is based on Idaho Power not providing evidence of analysis that quantifies how specific activities would reduce wildfire risk and how that compares to the cost to complete those activities.

Although in its WMP Idaho Power identified multiple activities utilized to reduce fire risk, Idaho Power did not include an analysis that measures how specific activities would reduce wildfire risk and how that compares to the cost to complete those activities. Idaho Power did not identify costs for implementing wildfire risk reduction activities in Oregon, or in its overall service territory.

For Idaho Power to Comply with this rule it must:

- Include the analysis of comparing wildfire risk reduction activities to the cost of completing those activities.

Staff Recommendations for Idaho Power's 2023 Plan:

6. Include a description of how it will measure the overall effectiveness of its wildfire mitigation activities, as well as information on wildfires in the service territory for the prior year.

OAR 860-300-0020 (1)(c):

Identified preventative actions and programs that the utility will carry out to minimize the risk of the utility's facilities causing wildfire.

Staff Analysis:

Idaho Power met this requirement. Throughout its Plan, Idaho Power identified preventative actions and programs that it will carry out to reduce the risk of utility facilities causing a wildfire.

Idaho Power has developed a Fire Potential Index (FPI) that reflects key variables, such as the state of native vegetation across the service territory, dead and live fuels, moisture content, and weather. Each of these variables is assigned a numeric value and those individual numeric values are summed to generate a Fire Potential value. Based on the Fire Potential value, the FPI score is determined. Based on FPI score, three

levels of wildfire risks are assigned. Green level indicates low potential for wildfire risk, Yellow level indicates elevated level of wildfire risk, and Red level indicates high level of wildfire risk. In its WMP, Idaho Power outlines preventative activities that it utilizes and will continue to utilize to reduce the risk of wildfires. These activities include situational awareness, wildfire preparedness and prevention plan, transmission lines and distribution lines operational strategies, PSPS, system hardening, transmission and distribution asset inspections, and vegetation management. Each action is described in how it will be executed and how it will minimize the risk of utility facilities causing a wildfire.

Staff Recommendations for Idaho Power's 2023 Plan:

7. Idaho Power include details on whether the objectives of key preventative actions outlined in previous year's WMP have been met.
8. Idaho Power describe, to what degree, the preventable measures outlined in previous year's WMP have reduced the risk of the utility's infrastructure from causing ignitions.
9. Idaho Power describe any adjustments made to its wildfire prevention programs that were included in previous year's WMP.

OAR 860-300-0020 (1)(d):

Discussion of the 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.

Staff Analysis:

Idaho Power met this requirement in its 2022 WMP by describing its outreach efforts for de-energization of power lines.

Idaho Power describes compliance with 1(d) beginning largely on page 33 through page 36. This can be found under the headings *9.5 Public Outreach and Communications, 10 Communicating the Plan, 10.1 Objective, 10.2 Idaho Power External Communications, 10.2.1 Community Engagement, 10.2.2 Idaho Power Customers, 10.2.2.1 Prior to Wildfire Season, 10.2.2.2 During Wildfire Season, and 10.2.2.3 After Wildfire Season*, but it is discussed in other sections of the plan.

Staff recommendations for Idaho Power's 2023 Plan:

10. Idaho Power include more detailed information about how it used learnings from the previous year to improve its 2023 Plan. The company should consider Public Safety Partner input through After Action Reports (from exercises and events), surveys or other feedback mechanisms, and Company lessons learned.
11. Idaho Power include clarification about Community Resource Centers (CRC) in its 2023 WMP Update, to include:
 - Whether CRCs will be activated by the Company in every instance of a PSPS.
 - How and when local emergency management will be notified about whether a CRC will be activated for critical preparation in meeting the needs of the impacted community.
12. Idaho Power incorporate the following in its 2023 WMP:
 - Map showing areas of its service territory at higher risk for PSPS events.
 - List of Public Safety Partners the Company engages with related to WMP.
 - Frequency of communication with Public Safety Partners.
 - Methods of communication with Public Safety Partners.
 - Feedback received from Public Safety Partners, and description of how the information influences the WMP.

OAR 860-300-0020 (1)(e):

Identified protocol for the de-energization of power lines and adjusting of power system operation to mitigate wildfires, promote the safety of the public and first responders, and preserve health and communication infrastructure.

Staff Analysis:

Idaho Power met this requirement by providing an overview of the stages of a PSPS event; the actions taken within each step; what happens during a PSPS event; and by describing adjustments it will implement to its power system operations to prevent its equipment to provide ignition to wildfire.

Idaho Power indicated that during wildfire season, it determines a daily FPI, which informs the transmission line operational strategy for overhead transmission lines located in RRZs. Those lines will be operated in normal settings mode, but without automatically closing a line that may have faulted during the time of a red FPI. In such a case, either the line will be patrolled to determine the cause of the fault, or crews will wait until the FPI level drops out of the red category before reenergizing the line.

Overhead distribution lines located in RRZs will operate such that automatic reclosing devices will be deactivated. If a line is faulted during the time of a red FPI, either the line will be patrolled to determine the cause of the fault, or crews will wait until the FPI level drops out of the red category before reenergizing the line.

The Company describes its de-energization protocol in compliance with 1(e) beginning largely on page 19 under the headings *7.4 Public Safety Power Shutoff, 7.4.1 PSPS Definition, and 7.4.2 PSPS Plan*, but it is discussed in other sections of the plan.

Staff Recommendation for Idaho Power's 2023 Plan:

13. Idaho Power include previous year's lessons learned regarding de-energization of power lines to include findings from after action reports, including survey results from exercises and actual events (when available), in its 2023 WMP.
14. Idaho Power include more information about the analysis completed to make their programmatic decisions of modifying system operations. The information should clarify why the Company describes plans for RRZs not YRZs, and differences in system operations between transmission lines and distribution circuits.

OAR 860-300-0020 (1)(f):

Identification of the community outreach and public awareness efforts that the utility will use before, during, and after a wildfire season.

Staff Analysis:

Idaho Power met this requirement by listing and describing some community outreach and public awareness efforts at a high level with more detail needed.

In its 2022 WMP, the Company describes its protocol in compliance with 1(f) beginning largely on page 33 through page 36. This can be found under the headings *9.5 Public Outreach and Communications, 10 Communicating the Plan, 10.1 Objective, 10.2 Idaho Power External Communications, 10.2.1 Community Engagement, 10.2.2 Idaho Power Customers, 10.2.2.1 Prior to Wildfire Season, 10.2.2.2 During Wildfire Season, and 10.2.2.3 After Wildfire Season*, but it is discussed in other sections of the plan.

Staff Recommendations for Idaho Power's 2023 Plan:

15. Idaho Power incorporate the following into its 2023 WMP:
 - Examples of messaging;

- Selection process for methods of outreach;
- Determination of target audience;
- Metric and criteria used to evaluate effectiveness of outreach;
- Outcome of previous year's outreach evaluation;
- Description of Company personnel and external resources responsible for outreach efforts;
- Description of timing of the outreach, including before, during, and after wildfire season;
- Description of Wildfire Mitigation Information/Resources maintained by the Company on its website; and
- Description of Social Media Campaign developed and implemented by the Company to inform customers about potential wildfire impacts (i.e. potential loss of power, preparedness, safety and awareness, etc.).

16. Idaho Power conduct wildfire training and exercises and include a discussion about community outreach and public awareness efforts prior to the upcoming fire season to clarify these activities, and to solicit input from participating Stakeholders.

OAR 860-300-0020 (1)(g):

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.

Staff Analysis:

Idaho Power met this requirement. Idaho Power practices conform to industry standards; however, the WMP lacks details regarding and explanation of the differences in employing inspection activities across all its service territory.

Idaho Power provided a description of various methods and tools it employs to inspect its overhead assets. For transmission structures, Idaho Power conducts annual aerial visual inspections along transmission lines inside and outside of RRZs, annual ground visual inspections, wood pole inspection and treatment program, cathodic protection and inspection program, and thermal imaging inspections of lines and equipment. It is unclear from the WMP whether these transmission related activities apply to any transmission structures in Oregon and whether these activities and their frequencies vary between non-YRZs and YRZs.

For distribution structures, Idaho Power conducts annual ground detailed visual inspections, wood pole inspection and a treatment program every 10 years, and annual

line equipment inspections. Defects found during inspections are prioritized and repaired accordingly. The WMP, however, lacks clarity on whether these activities vary between non-YRZs and YRZs.

Staff Recommendation for Idaho Power's 2023 Plan:

17. Idaho Power clearly identify inspection and correction procedures and protocols for non-wildfire risk zones, inspection and correction procedures and protocols for RRZs, and inspection and correction procedures and protocols for YRZs, along with the impacted line-miles and structure counts for transmission and distribution assets in Oregon.
18. Idaho Power include logic and details of analysis completed for their inspection and correction programming decisions in YRZs (and if any future RRZs) in Oregon.

OAR 860-300-0020 (1)(h):

Description of the procedures, standards, and timeframes that the utility will use to carryout vegetation management in areas it has identified as heightened risk of wildfire.

Staff Analysis:

Idaho Power met this requirement. However, there are deficiencies in the WMP regarding the vegetation management program. For transmission line vegetation management activities, it is unclear if vegetation management practices vary between non-wildfire risk zones, RRZs, and YRZs.

It is unclear from the WMP whether there are distribution lines in the YRZs in Oregon. It is also unclear how the frequency of the inspections varies from non-wildfire risk zones and RRZ and YRZs.

When reviewing Idaho Power's distribution line clearing procedures, it is unclear if the line clearing procedures vary between non-wildfire risk zones, RRZs, and YRZs. Staff is unable to determine if line clearing cycles considers the specific vegetation species growth and/or conditions are included as factors to mitigate risk of vegetation contact. Furthermore, it is unclear from the WMP if the quality control and assurance protocols vary between non-wildfire risk zones, RRZs, and YRZs.

Staff and the IE made similar observations about the need for more detail and clarity in Idaho Power's plans and practices around vegetation management.

Staff Recommendation for Idaho Power's 2023 Plan:

19. Idaho Power clearly identify 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.
20. Idaho Power 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.
21. Idaho Power provide more information regarding their quality control/quality assurance program and audits for vegetation management work completed in the RRZs, YRZs, including measures employed and resource types.
22. Idaho Power provide analysis of any historical events pertaining to its power lines, specific equipment type, vegetation, and wildfires that informed the program's design and monitoring approach.

OAR 860-300-0020 (1)(i):

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.

Staff Analysis:

Idaho Power did not meet the requirement of this rule. In response to the IE's report, Idaho Power did provide an estimate of the costs listed in the rule as an addendum to its Plan. However, neither the WMP nor the addendum provided any quantitative discussion of prioritization of investments or choices. There is little specificity of options being considered and no discussion about options or solutions that might provide co-benefits. The discussion in the Plan was very general and provided staff with no assurance that Idaho Power was applying risk analysis to its plans and investments.

For Idaho Power to Comply with this rule it must:

- Provide more detail on the investments being made.
- Include a summary of the quantitative analysis used in the choice and prioritization of specific solutions and investments.

- Provide examples of how it considers co-benefits when identifying solutions.

Staff Recommendation for Idaho Power's 2023 Plan:

23. Idaho Power discuss the impact of participation in expert forums (see OAR 860-300-0020(1)(j)) on identification of solutions most likely to provide the benefits anticipated. This should include:
- Cited research, reports, and studies used in any analysis, unless the source is confidential.
 - How the factors unique to the Company's facilities and service territory were used when considering the applicability of specific options to its systems.

OAR 860-300-0020 (1)(j):

Description of participation in national and international forums, including workshops identified in section 2, chapter 592, Oregon Law 2021, as well as research and analysis the 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.

Staff Analysis:

Idaho Power met the requirement of this rule. Staff appreciates the Company providing specific examples of projects it is participating in as a result of these relationships.

The Company described its engagement in a number of forums where it can collaborate with peers and well as national and international experts. The Company provided examples of these relationships led the Company to expand its use of Unmanned Aircraft Systems (UAS), also known as drones, during line patrols. These collaborations have also led to Idaho Power replacing expulsion fuses with energy limiting fuses, and adding mesh wraps to wood poles in wildfire risk zones.

Staff Recommendation for Idaho Power's 2023 Plan:

24. Idaho Power include more specifics on what it has learned by participating in these groups. Staff would like assurance the Company is leveraging the learnings from other utilities and experts to facilitate implementation of solutions with the highest benefit cost ratio.
25. Idaho Power include its contribution to these forums including any research projects it is supporting or participating in.

Stakeholder Comments Related to Overall Plan:

In general, the comments provide many ideas for consideration when Idaho Power is developing its plan for 2023.

STOP B2H Coalition³

STOP B2H Coalition's (STOP) comments were focused on the Company's assessment of areas subject to high wildfire risk. STOP is concerned both with the risk to and from Idaho Power's existing facilities, as well as the path for the proposed Boardman to Hemmingway line, and has directly asked Idaho Power to provide more clarity on its risk analysis.

Idaho Power Company⁴

Idaho Power expressed concern that the evaluation criteria used by the IE is beyond the requirements set in current rule. Also, the IE's evaluation criteria were established and published after the utilities filed their WMPs. Staff recognizes this may appear unfair and inappropriate. Staff wants to make clear that the IE's recommendations and conclusions only provided guidance to Staff. The individuals with Bureau Veritas conducting the evaluation have extensive experience evaluating plans in other states with varying requirements. Many of the IE's comments reflect that experience. Much of the IE's discussion provides guidance to Staff for evaluation of future WMPs. Staff does agree with many of the recommendations provided by the IE and those are captured in Staff's memo.

It is not unusual for Commission orders to expand or provide clarification for how a utility demonstrates compliance with specific requirements in rule. If the Commission adopts Staff's recommendations, the order will provide further guidance. Additionally, it is anticipated upcoming WMPs will be governed by requirements being developed in Docket No. AR 638.

Conclusion

Staff considers WMPs as ongoing living documents or plans that are more a "journey" and less a "destination." Future plans will be shaped by new technology, greater understanding of risks, climate change, and energy policy. Minimum requirements will likely change and expectations of providing more details used in risk analysis, cost-benefit analysis and new technologies will expand. This will be a continuing effort in partnership with Stakeholders to not only comply with minimum requirements, but also

³ <https://edocs.puc.state.or.us/efdocs/HAC/um2209hac163939.pdf>.

⁴ <https://edocs.puc.state.or.us/efdocs/HAC/um2209hac15226.pdf>.

to improve practices that will facilitate electric safety and reliability for the utilities and the public they serve.

One of many observations Staff made while evaluating Idaho Power's plan is that it is difficult to map elements of the plan to the requirements on OAR 890-300-0020. Even in the Company's reply comments to the IE's evaluation, the Company described how it felt it did meet criteria the IE assessed as missing, but the Company didn't refer specifically to where this information could be found in its Plan.

OAR 860-303-0002(1)(b), OAR 860-303-0002(1)(i), and OAR 860-303-0002(1)(j), all state costs and benefits to be considered. The Company's discussion throughout its plan was subjective with little analytical back-up. It's difficult for Staff or anyone to review the plan and find evidence of decisions being made that are the most cost effective.

A significant amount of content of the plan was front-line operational in nature, providing what appear to be detailed training documents for utility staff discussing clothing requirements (FR clothing, boots, etc.) as well as crew practices like tailboards. This is important information, but doesn't belong in a document demonstrating the Company is operating in compliance with a risk-based wildfire mitigation plan.

Staff's concluding summary of its evaluation of Idaho Power's 2022 WMP is that while the Company met several of the individual requirements in rule, the overall Plan doesn't provide necessary evidence that the Plan is risk-based with demonstrated cost-benefit analysis. Therefore, Staff can't recommend Commission approval of Idaho Power's Plan.

Staff acknowledges the Company is in the early phases of developing and implementing its Plan. In comparison, Pacific Power has been constantly updating and refining its plans as California updates and expands its requirements for utility WMPs.

A number of recommendations are provided here and in the IE's report that Staff believes will help guide the Company as it further develops its Plan. The key statement and direction provided by law is the plans are to be risk-based. The plan has to provide adequate quantitative and objective evidence to assure the Company is pursuing actions that provide the most benefits with ratepayer dollars. While Staff does not recommend approval of the Plan at this time, it has included recommendations for Idaho Power's 2023 WMP in Attachment A.

ORS 757.963(5) gives the Commission three options in addressing utility WMPs. The Commission can reject the filing if it fails to comply with all applicable rules and

standards adopted for WMPs; it can approve the WMP with conditions; or it can approve the WMP.

Staff recommends the Commission not approve Idaho Power's 2022 WMP at this time and directs the Company to submit a supplemental filing to bring the plan into compliance with applicable standards and attain Commission approval by June 28, 2022. To comply with the requirements for the 2022 WMP, the Company must comply with the requirements of OAR 860-300-0020 (1)(b) & OAR 860-300-0020 (1)(i) by:

- Including the analysis of comparing wildfire risk reduction activities to the cost of completing those activities.
- Providing more detail on the investments being made.
- Including a summary of the quantitative analysis used in the choice and prioritization of specific solutions and investments.
- Providing examples of how it considers co-benefits when identifying solutions.

The June 28, 2022, deadline is consistent with the 180 day review period for WMPs articulated in ORS 757.963.

PROPOSED COMMISSION MOTION:

Not approve Idaho Power's 2022 Wildfire Mitigation Plan and direct the Company to submit a supplemental filing to bring the plan into compliance with applicable standards by June 28, 2022.

Attachment A: UM 2209 – Staff Recommendations

Staff Recommendations for 2023 Plans:

OAR 860-300-0020 (1)(a)(A) & (B):

1. Idaho Power provide details regarding the mileage of overhead facilities that lie within its designated YRZs and RRZs.
2. Idaho Power provide details of the analysis completed for establishing the risk tiers, and the threshold values utilized for classifying the YRZs and RRZs
3. Idaho Power provide information regarding an analysis of the risk from specific utility asset types.
4. Idaho Power provide details of the process and timing that will be followed to evaluate the established heightened wildfire risk zones, and what data inputs and portions of the analysis will be reviewed annually.
5. Idaho Power address the concerns raised by STOP B2H Coalition as thoroughly as possible.

OAR 860-300-0020 (1)(b):

6. Idaho Power include a description of how it will measure the overall effectiveness of its wildfire mitigation activities, as well as information on wildfires in the service territory for the prior year.

OAR 860-300-0020 (1)(c):

7. Idaho Power include details on whether the objectives of key preventative actions outlined in previous year's WMP have been met.
8. Idaho Power describe, to what degree, the preventable measures outlined in previous year's WMP have reduced the risk of the utility's infrastructure from causing ignitions.
9. Idaho Power describe any adjustments made to its wildfire prevention programs that were included in previous year's WMP.

OAR 860-300-0020 (1)(d):

10. Idaho Power include more detailed information about how it used learnings from the previous year to improve its 2023 Plan. The company should consider Public Safety Partner input through After Action Reports (from exercises and events), surveys or other feedback mechanisms, and Company lessons learned.

11. Idaho Power include clarification about Community Resource Centers (CRC) in its 2023 WMP Update, to include:
 - Whether CRCs will be activated by the Company in every instance of a PSPS.
 - How and when local emergency management will be notified about whether a CRC will be activated for critical preparation in meeting the needs of the impacted community.
12. Idaho Power incorporate the following in its 2023 WMP:
 - Map showing areas of its service territory at higher risk for PSPS events.
 - List of Public Safety Partners the Company engages with related to WMP.
 - Frequency of communication with Public Safety Partners.
 - Methods of communication with Public Safety Partners.
 - Feedback received from Public Safety Partners, and description of how the information influences the WMP.

OAR 860-300-0020 (1)(e)

13. Idaho Power include previous year's lessons learned regarding de-energization of power lines to include findings from after action reports, including survey results from exercises and actual events (when available), in its 2023 WMP.
14. Idaho Power include more information about the analysis completed to make their programmatic decisions of modifying system operations. The information should clarify why the Company describes plans for RRZs not YRZs, and differences in system operations between transmission lines and distribution circuits.

OAR 860-300-0020 (1)(f):

15. Idaho Power incorporate the following its 2023 WMP:
 - Examples of messaging;
 - Selection process for methods of outreach;
 - Determination of target audience;
 - Metric and criteria used to evaluate effectiveness of outreach;
 - Outcome of previous year's outreach evaluation;
 - Description of Company personnel and external resources responsible for outreach efforts;
 - Description of timing of the outreach, including before, during, and after wildfire season;
 - Description of Wildfire Mitigation Information/Resources maintained by the Company on its website; and

- Description of Social Media Campaign developed and implemented by the Company to inform customers about potential wildfire impacts (i.e. potential loss of power, preparedness, safety and awareness, etc.),

16. Idaho Power conduct wildfire training and exercises and include a discussion about community outreach and public awareness efforts, prior to the upcoming fire season to clarify these activities, and to solicit input from participating Stakeholders.

OAR 860-300-0020 (1)(g):

17. Idaho Power clearly identify inspection and correction procedures and protocols for non-wildfire risk zones, inspection and correction procedures and protocols for RRZs, and inspection and correction procedures and protocols for YRZs, along with the impacted line-miles and structure counts for transmission and distribution assets in Oregon.

18. Idaho Power include logic and details of analysis completed for their inspection and correction programming decisions in YRZs (and if any future RRZs) in Oregon.

OAR 860-300-0020 (1)(h):

19. Idaho Power clearly identify 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.

20. Idaho Power 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.

21. Idaho Power provide more information regarding their quality control/quality assurance program and audits for vegetation management work completed in the RRZs, YRZs; measures employed, and resource types.

22. Idaho Power provide analysis of any historical events pertaining to its power lines, specific equipment type, vegetation, and wildfires that informed the program's design and monitoring approach.

OAR 860-300-0020 (1)(i):

23. Idaho Power discuss the impact of participation in expert forums (see OAR 860-300-0020(1)(j)) on identification of solutions most likely to provide the benefits anticipated. This should include:
- Cited research, reports, and studies used in any analysis, unless the source is confidential.
 - How the factors unique to the Company's facilities and service territory were used when considering the applicability of specific options to its systems.

OAR 860-300-0020 (1)(j):

24. Idaho Power include more specifics on what it has learned by participating in these groups. Staff would like assurance the Company is leveraging the learnings from other utilities and experts to facilitate implementation of solutions with the highest benefit cost ratio.
25. Idaho Power include its contribution to these forums including any research projects it is supporting or participating in.