



Oregon Public Utility Commission  
201 High Street SE, Suite 100  
Salem, OR 97301-3398

October 18, 2021

RE: AR 648 – Wildfire Protection Plans

Dear Chair Decker, Commissioner Tawney and Commissioner Thompson,

The Oregon Solar + Storage Industries Association (OSSIA) appreciates the considerable work that PUC staff and the utilities have put into making sure that the grid is ready for wildfire season in dockets AR 638 and AR 648. This work is critical to ensure that the grid is ready for the increase in wildfires that Oregon continues to experience.

OSSIA would like to highlight the importance of inclusion of (1)(B)(h) in the proposed changes to OAR 860-300-0002. When the utilities are planning for infrastructure improvements and upgrades to ensure the grid is resilient during wildfires, it makes sense to also include consideration of technologies that provide co-benefits to the grid. Making the grid more Distributed Energy Resources (DER) ready during wildfire system hardening saves ratepayer dollars by combining efforts.

PGE, PacifiCorp and Idaho Power all state a vision in their recently filed distributed system plans to have a grid infrastructure that allows for increased customer generation. We applaud this vision and expect them to continually look for opportunities to strengthen the grid in ways that include co-benefits to ratepayers and, ultimately, to reduce the climate pollution adding to the increase in wildfires.

OSSIA looks forward to working with the three utilities to include these co-benefits in their wildfire protection plans.

Sincerely,

Angela Crowley-Koch  
Executive Director