

From: [Andy Fletcher](#)
To: [PUC PUC.FilingCenter * PUC](#)
Cc: [Brian Kollman](#); [Keenan Jack](#); [Britni Davidson](#); [Ted Case](#)
Subject: RO14
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Attachments: [4711_001.pdf](#)

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PUC,

Please find the attached Columbia Basin Electric Cooperative's Fire Mitigation Plan for 2023. There have been no changes since last year.

Thank you,
Andy Fletcher
Columbia Basin Electric Cooperative
541-676-9146



Columbia Basin Electric Cooperative, Inc.

171 W Linden Way • PO Box 398 • Heppner, Oregon 97836-0398

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TITLE: WILDFIRE MITIGATION PLAN

I. OBJECTIVE

Establish operations, maintenance and construction practices and standards to minimize the risk of the Columbia Basin Electric Cooperative's (CBEC) electric distribution and transmission facilities potential involvement in a wildfire.

II. OVERVIEW

To meet this objective, while still providing safe and reliable power to our members, CBEC will document and evaluate existing wildfire mitigation practices. The Wildfire Mitigation Plan (WMP) addresses the following categories:

- A. Geographic area wildfire risk assessment – this assessment will focus on risk factors unique to the various micro-climates, diverse terrain, and vegetation types across Morrow, Gilliam, Wheeler, Umatilla, and Sherman Counties.
- B. Electric plant ignition risk assessment – this assessment will examine electric plant components and assemblies, their condition and wildfire risks associated with the same.
- C. Electric plant system hardening – uses the electric plant ignition risk assessment (based on knowledge of distribution lines and timbered areas) to plan ways to harden (upgrade or improve) the electric plant, thereby minimizing its potential to ignite a fire.
- D. Right-of-way (ROW) vegetation management – CBEC contracts with tree trimmers every other year to trim ROW throughout our entire service territory.



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- E. Operations practices to mitigate wildfire risk – considers tools, equipment, work methods, and coordination with other entities that work to minimize the potential for the electric plant to cause a wildfire while performing its primary function of serving electricity to CBEC members.
- F. CBEC's Wildfire Mitigation Plan is updated every five years.

III. DEFINITIONS

- Right-of-Way (ROW) – a legal agreement that allows access to the property directly beneath and to either side of an electric power line. The right-of-way allows CBEC to enter the property at any time, to perform maintenance or repairs on the electric plant.
- Geographic Information System (GIS) – a framework for gathering, managing, and analyzing data. It analyzes spatial location and organizes layers of information into visualizations using maps and 3D scenes.
- Global Positioning System (GPS) – a satellite navigation system used to determine the ground position of an object.
- Red Flag Warning – the highest alert issued by the National Weather Service signaling warm temperatures, very low humidity, and strong winds are expected to combine and produce severe fire danger.
- Fire Season – as annually announced by the United States Forest Service and Oregon State Department of Forestry.
- Hot Spots – vegetation that is encroaching or making contact with an energized conductor prior to regular cycle trimming.

IV. GEOGRAPHIC AREA WILDFIRE RISK ASSESSMENT

CBEC will perform a geographic wildfire risk assessment of its overhead transmission and distribution system Right of Ways (ROW).

CBEC will use the following factors to assess the geographic wildfire risk to any given ROW or access point (AP) along a ROW.



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A. CLIMATE

1. CBEC's physical plant resides within US Forest Service Heppner Ranger District, State Forestry Pendleton Area, and State Forestry Fossil Area. CBEC conforms to the Industrial Fire Precaution Levels (IFPL) I, II, III, IV:
 - a. Level I - Fire Season – Fire precaution requirements are in effect.
 - b. Level II - Limited Shutdown – Only certain operations may continue between the hours of 8 pm – 1 pm.
 - c. Level III - Restricted Shutdown – Only certain operations may continue between the hours of 8 pm – 1 pm where mechanized equipment capable of constructing a fire line is immediately available to quickly reach and effectively attack a fire start.
 - d. Level IV - Complete Shutdown – All operations are prohibited.

B. VEGETATION

1. CBEC has an aggressive vegetation management program. See below for details of tree trimming (VII ROW Vegetation Management).
2. Reports of vegetation concerns from members are delivered to Operations staff for evaluation and to determine the necessary course of action to mitigate wildfire risk.

V. ELECTRIC PLANT IGNITION RISK ASSESSMENT

CBEC will perform a physical inspection of the electric plant for potential wildfire risk due to equipment type or failure. Operations field personnel will complete the initial assessment by the end of 2022. After the initial assessment, periodic reviews will be conducted every 5 years.

- A. CBEC's system health and age are evaluated and reported by assessing the age and condition of poles, conductor, and equipment. This report will be utilized for system hardening, construction works plans, and budgeting.



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- B. Protection equipment settings are reviewed to determine their ability to inhibit reenergizing power lines following an overcurrent event.

- C. Physical Patrols and Inspections
 - 1. CBEC's linemen conduct detailed facility inspections of the system on a ten-year cycle evaluating the system's NESC compliance and looking for potential hazards.
 - 2. Post-storm patrols are conducted by field personnel who patrol lines after a storm in search of potential hazards.
 - 3. Safety inspections are conducted by CBEC's linemen to identify any potential public safety hazards. The system is covered on a two-year cycle.

VI. SYSTEM HARDENING

CBEC will evaluate and upgrade overhead and underground facilities based upon the wildfire risks identified in the electric plant ignition risk assessment.

- A. Evaluate the benefits of rebuilding underground for fire mitigation when an overhead line replacement is planned due to age.
- B. Evaluate the condition and age of all transmission and distribution facilities for repair, replacement, and upgrades.
- C. Consult the Long-Range Plan (LRP) to prioritize upgrades based on age and health of system components and fire risk area where the equipment is located. Fire risk posed by the equipment is then evaluated to determine if it will influence replacement timing.
- D. Engineering staff review the current Coordination study to evaluate protection measures and make recommendations for protection device schemes.
- E. Evaluate and implement new technology (Trip-savers, non-expulsion fuse types, recloser settings, grid/fault monitoring, etc.) to mitigate fire ignition risk posed by the system.



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- F. CBEC maintains a pole test and treat program to evaluate the integrity and extend the life of electric plant poles. Test and treat program data are used to help prioritize pole replacement.
- G. Substation inspections are conducted on a weekly and monthly basis to identify and mitigate fire ignition risk from substation equipment failure.

VII. ROW VEGETATION MANAGEMENT

CBEC has an aggressive ROW vegetation management program. The focus has been to prevent vegetation contact with overhead conductors. Now additional attention is being given to reduce the fuel load within the ROW's.

- A. CBEC utilizes contract crews to clear the ROW through hand cutting of vegetation, removing danger trees, along and outside of the ROW. Crews also apply herbicide to prevent re-growth of vegetation.
- B. Operations field personnel trim ROW "hot spots", as needed, to control vegetation contact with overhead lines.
- C. ROW clearing cycle times are adjusted based on patrols and historical trimming/mowing records.
- D. Field personnel conduct inspections outside of the ROW, to find snags and dangerous trees that pose a threat of falling into the energized electric plant. Any such findings are scheduled for removal.

V. OPERATIONS PRACTICES

As fire season approaches each year and fire precaution levels increase, the operations department adjusts work practices and system operations. These adjustments are coordinated with the IFPL and escalate with the increasing wildfire danger. Some practices are intended to mitigate risk of fire ignition and others are in place to control and extinguish an accidental fire before it grows out of control.



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- A. All CBEC field personnel have required fire suppression equipment on-site during fire season.
- B. During high fire risk CBEC locates its 150-gallon truck-mounted fire pumper in Heppner.
- C. CBEC field personnel receive annual OSHA training/refresher course on wildland fire fighting and have been trained on wildland fire suppression.
- D. Protective relays on the distribution system are normally set to “reclose” following a fault on the system. This automatically restores power if the cause of the fault was temporary. During fire season protective relay settings are changed to be more sensitive and to limit or inhibit automatic reclosing. This limits the possibility of an automatic reclosing operation igniting a fire. Line inspections will be performed during an event prior to re-energizing line.
- F. Operations personnel monitor the weather daily for the IFPL fire levels and the National Weather Service for red flag warnings during fire season.
- G. CBEC field personnel are restricted to the use of battery and hydraulic powered tools when the IFPL reaches Level III, except for emergencies involving large trees.

Andy Fletcher, General Manager

Brian Kollman, Operations Manager

Gerry Arnson, Board President

Date Adopted: 5-25-23 _____

Date Reviewed (every 5 years): _____

Geographic area wildfire risk assessment (Date): _____

Electric plant ignition risk assessment (Date): _____

Electric plant system hardening (Date) _____