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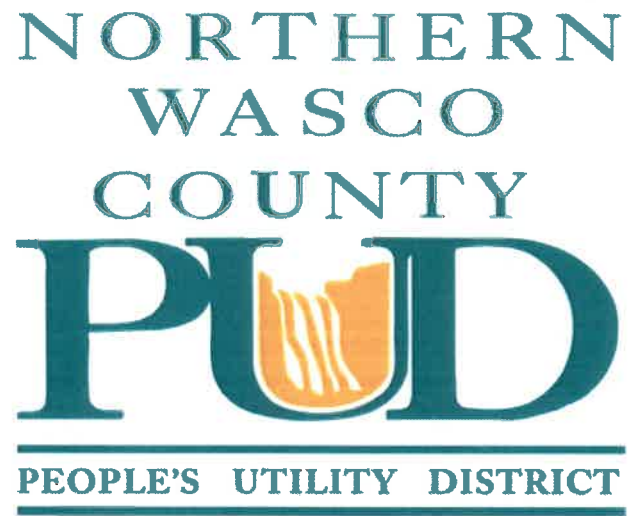
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Policy Number:	
Policy Type:	
Policy Title:	Wildfire Mitigation Plan
Effective Date:	8/3/2021



WILDFIRE MITIGATION PLAN

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1.0 INTRODUCTION

In recent years, the west has experienced wildfire seasons that have resulted in more fires of greater duration and intensity than in years past. There have been several instances in which an electric utility system has been shown to cause or contribute to these fires.

This Wildfire Mitigation Plan has been developed in order to document the Northern Wasco County PUD (NWCPUD) response to this growing regional concern, and to outline the steps that will be taken to protect our people, our assets, and the communities in which we operate.

1.1 Policy Statement

NWCPUD's Mission is to provide reliable, competitively priced energy and related services that benefit our customers in the tradition of public power. NWCPUD strives to design, construct, operate, and maintain its electrical lines and equipment in alignment with this Mission, and in a manner that minimizes the risk of wildfire ignition.

1.2 Purpose

The Wildfire Mitigation Plan describes the wildfire risk assessment process, mitigation strategies, and response protocols used to minimize the probability of wildfire ignition from NWCPUD's power lines and/or electrical equipment.

1.3 Objectives

The primary objectives of the Wildfire Mitigation Plan are to:

- Ensure public safety through a system of continuous wildfire risk potential assessment, with strategies to mitigate any identified risks.
- Minimize fire ignitions from fault events by designing, constructing, operating, and maintaining hardened and resilient electric systems.
- Minimize the impacts of a wildfire to the utility and surrounding communities through enhanced situational awareness, operational readiness, and effective response strategies.

2.0 BACKGROUND

Northern Wasco County People's Utility District is a customer-owned utility that provides nearly 25,000 people and businesses with electricity in Wasco County, Oregon. NWCPUD is a Special District of the State of Oregon and governed by an elected five-member board.

2.1 Service Area

NWCPUD provides service to an area of approximately 87 square miles, encompassing The Dalles and the rural communities of Rowena, Dufur, Tygh Valley, Wamic, and Celilo Village. Outside of the municipal areas, the service territory is largely comprised of rugged, exposed terrain, with few areas of dense vegetation.

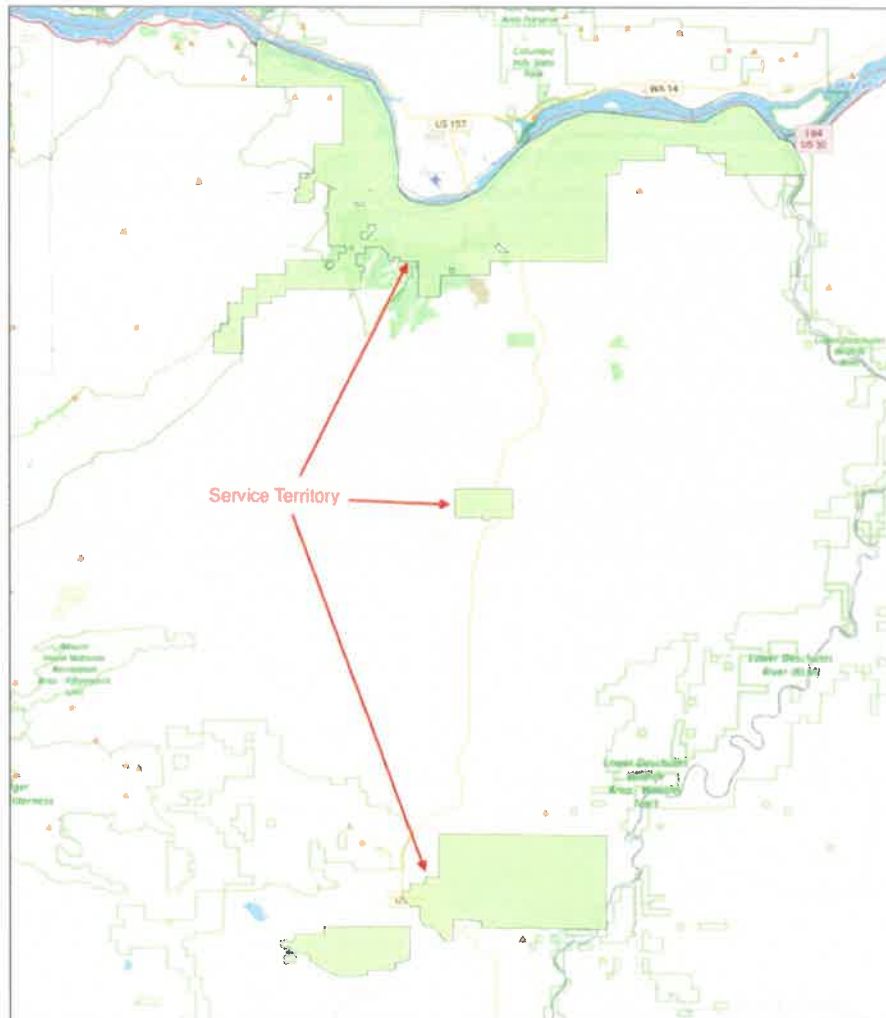


Figure 1: NWCPUD Service Territory

2.2 Electric System

NWCPUD takes delivery of energy through BPA’s Big Eddy, The Dalles, and Chenoweth substations, which feed NWCPUD’s substations via a series of NWCPUD- and BPA-owned 115 kV transmission lines. The southern portion of the service territory is fed from a 69 kV NWCPUD-owned transmission line that originates at the Three Mile substation.

NWCPUD is a winter-peaking utility at approximately 150 MW.

2.3 Asset Overview

The following is a summary table of the NWCPUD electric system assets that are currently in service.

Table 1: Electric System Asset Summary

Asset		Quantity
Substations		9
Transmission & Distribution Pole Structures		7377
Overhead Distribution Transformers		2404
Pad-Mount Distribution Transformers		749
Asset	Overhead Miles	Underground Miles
Transmission Lines	38	-
Primary Distribution Lines	195	49
Secondary Service Lines	124	7

2.4 Fire Protection Zones

The majority of the NWCPUD service territory is non-forested land, though portions of our system approach the boundaries of the MH-1 zone, with restrictions established by the US Forest Service (Mount Hood National Forest).

3.0 RISK PROFILE

While the most destructive wildfires in our state typically occur in heavily forested areas, our district has a potentially hazardous combination of hot and dry summers exacerbated by periods of high winds.

3.1 District Wildfire Risk

The source of risk data for this plan comes from the Oregon Wildfire Risk Explorer, a partnership among Oregon Department of Forestry, Oregon State University Institute for Natural Resources, OSU Libraries and Press, the US Forest Service, and a wide variety of stakeholders throughout Oregon.



Figure 2: District Burn Probability

Figure 2 shows our electric system overlaid with the overall “Burn Probability,” the likelihood of a wildfire > 250 acres burning in a given location. The yellow and orange colors covering our entire services territory indicate a “high” probability in all areas. Yellow indicates a probability of between 1-in-500 and 1-in-100. Orange indicates a probability of between 1-in-100 and 1-in-50.

3.2 Potential Ignition Sources

The possible causes for ignition of a wildfire by the components of the overhead electric system have been grouped into the following categories. Each of these is taken into account when planning, designing, and constructing the electric system.

- Contact with Objects
- Equipment Failure
- Wire-to-Wire Contact
- Other

3.2.1 Contact with Objects

NWCPUD’s overhead power lines are installed as bare wire on top of insulated poles and structures. Depending on the voltage level and other design criteria, the power lines are kept a specified distance from the ground, from each other, and from adjacent objects in order to prevent contact. Even so, with hundreds of miles of conductors in the air, contact from objects is bound to occur periodically throughout the year.

Vegetation

Trees from inside and outside the utility right of way can come into contact with lines by falling, potentially causing electrical arcs or sparks. Occasionally, this can result in a downed line, creating a potential for fire ignition. In other instances, a tree or branch may lean or grow into a line, resulting in a continual burn at the point of contact.

Vehicles

Vehicular contact with poles or supporting guy wires can damage or break the pole, which in turn can put stress on other components, causing a line to break and fall to the ground with the potential for arcs and sparks.

Wildlife, Kites, and Balloons

Birds and other animals, as well as highly conductive kites and mylar balloons, can make contact with power lines and cause arcs and sparks. Protection devices such as circuit breakers, reclosers, and fuses are installed to isolate and protect against these faults but arcing or sparking can occur during the brief time that it takes for one of these devices to operate.

3.2.2 Equipment Failure

NWCPUD aims to have a highly reliable electric system, and achieves this through inspections, maintenance, and the timely replacement of aging equipment. However, environment stresses continually wear on the equipment and can eventually result in a failure.

Failed components such as connectors and insulators can cause an energized conductor to fall to the ground, potentially emitting sparks prior to the breaker or fuse tripping. Other equipment such as transformers can fail internally, causing the protective fuse to open, which can produce sparks and ignite a fire under the right conditions.

3.2.3 Wire-to-Wire Contact

When two overhead lines contact one another, arcing and sparking can occur, creating a potential ignition source. This wire-to-wire contact can occur due to vehicular collision or falling trees. The utility's overhead lines are designed to meet the windy conditions of this service area, but it is still possible to have wire-to-wire contact due to a severe wind event.

3.2.4 Other

A potential ignition source can be caused by contacts from property owner equipment or contractors, or damage due to vandalism.

NWCPUD vehicles and tools can be a potential ignition source. Crews working in or driving through remote areas with dry grass or brush can cause this vegetation to ignite. Gas-powered tools and can cause ignition in dry conditions.

3.3 Risk Assessment

Because there is a high burn probability in our entire service territory, the whole district is susceptible to damage from wildfires, and all areas of our overhead electric system have at least some potential to ignite a wildfire.

District staff, however, believe that the most vulnerable areas are those that lie outside of the more populated areas of the City of The Dalles, the City of Dufur, and Tygh Valley. In the more rural areas, a fire is likely to burn longer before being detected and the response time of firefighters will be slower.

The areas listed below in Table 2 have been identified as the highest risk within our service territory based on the proximity to firefighting resources and also the age of the infrastructure.

Table 2: Areas of Highest Risk

Identification	Comments
Feeder 17	From Taylor Lake to Rowena
Feeder 22	Chenowith Creek Rd, McDonald Way, Browns Creek Rd
Feeder 23	Cherry Heights Rd
Feeder 42	From Old Moody Rd to the Deschutes
Feeder 71	From Tygh Valley to Wamic
69 kV Transmission	From 3 Mile Substation to Tygh Valley Substation

4.0 RISK MITIGATION STRATEGIES

This section describes the proactive measures used by the PUD to minimize the potential for wildfire ignition by the electric system.

4.1 System Inspection and Maintenance

The following rigorous testing and maintenance program contributes to both system reliability and wildfire mitigation.

4.1.1 Pole Testing and Treatment

NWCPUD complies with OAR 860-024-0011 and inspects, tests, and treats ten percent of its overhead facilities every year. This process includes visual inspection, pole sounding, inspection hole drilling, and fumigant hole drilling accompanied with a chemical application to preserve the life of the pole.

4.1.2 Detailed Inspections

Field Inspections

A detailed field inspection is performed on ten percent of the overhead facilities each year in accordance with OAR 860-024-0011. The field inspector performs this inspection on a per-facility basis documenting deficiencies, NESC code violations, and safety hazards.

Safety Patrols

Routine safety patrols of overhead supply lines and accessible facilities are performed in order to identify hazards to the public. A minimum of 50 percent of the system is patrolled each year.

Monthly Inspections

All substations are inspected monthly by Operations staff.

4.2 Vegetation Management

NWCPUD has implemented a vegetation management program and a board-approved Tree Trimming Policy focused on keeping Rights-of-Way clear of fuel. The policy and program include tree trimming and removal, vegetation mowing and trimming, and the application of herbicides.

4.2.1 Tree Trimming

Distribution Lines

Trees near our feeder lines are systematically trimmed a minimum of once every four years, with trouble areas being addressed more frequently as they are identified by our routine inspections. This information is documented in the PUD's Geographic Information System (GIS) as shown in Figure 3.

Transmission Lines

Areas near transmission lines are inspected multiple times per year and are trimmed more frequently than distribution lines as soon as it becomes necessary.

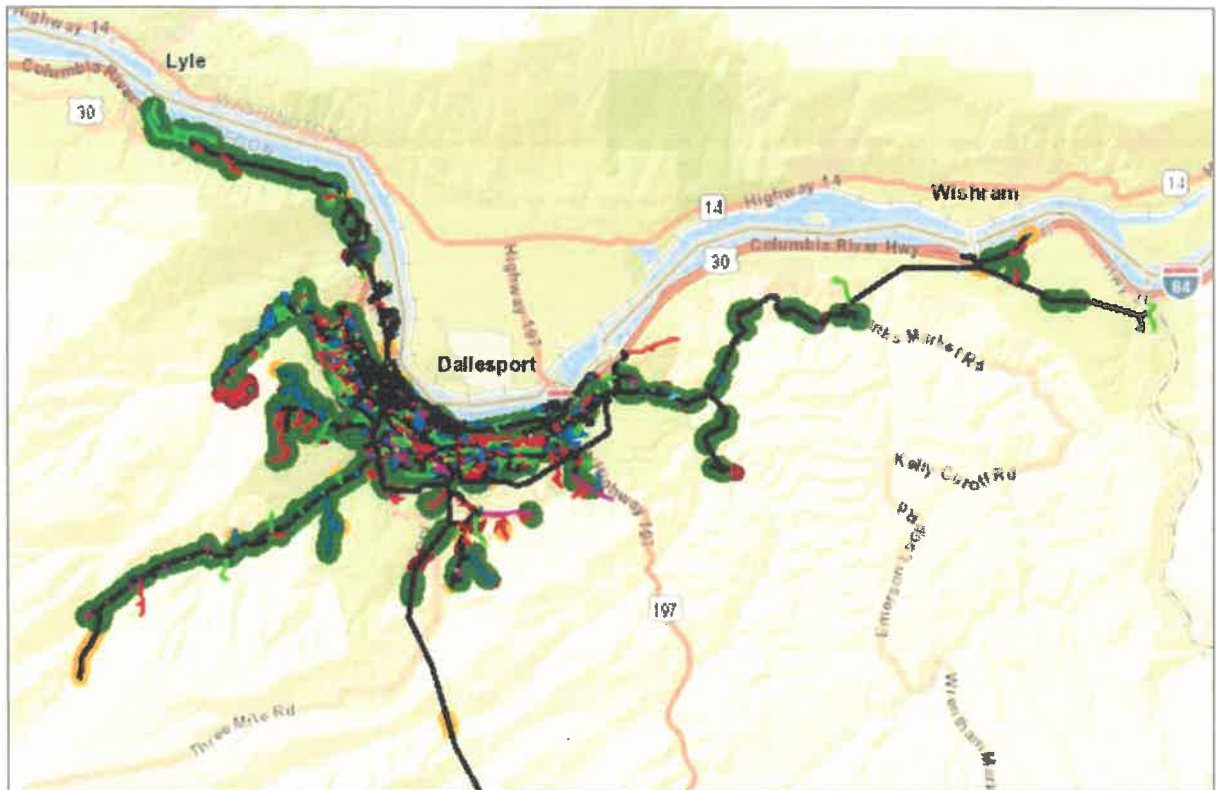


Figure 3: Tree Trimming GIS Records

Clearances

NWCPUD tree-to-conductor clearance requirements exceed those required by the Public Utility Commission (PUC) in OAR 860-024-0016, and wherever possible we exceed our own policy requirements as seen below.

Table 3: Tree Trimming Clearances

Description	PUC Required	NWCPUD Policy	Actual Practice
Transmission Minimum Clearance (50 kV – 200 kV)	7.5 ft	10 ft	19 ft
Distribution Minimum Clearance (600 V – 50 kV)	5 ft	6 ft (bottom) 5 ft (sides)	10 ft

4.2.2 Other Vegetation

Grasses and other combustible vegetation are cleared in a ten-foot radius around each of our transmission poles and some through mowing, trimming, and the application of herbicides. This is completed a minimum of once every three years.

Presently, this type of vegetation management is also performed on a few distribution poles in difficult-to-reach areas. This program will be expanded to include all distribution poles on the feeder lines identified in Table 2, which are located in non-irrigated, high-hazard locations.

4.3 System Hardening

NWCPUD’s existing construction standards provide for robust, reliable systems in the environmental conditions that are faced within this region. On a case-by-case basis, system hardening investments are evaluated. Hardening measures available to NWCPUD include:

- Stronger poles than required by code
- Use of steel poles rather than wood
- Larger spacing between conductors to reduce the potential for conductor-to-conductor contact
- Undergrounding

4.4 System Protection

The addition or modification of protective devices can minimize the chance that a fault will result in a wildfire ignition. There are two key areas where investments in system protection improvements may mitigate wildfire ignition hazards.

4.4.1 Non-expulsion Fuses

Fuses protect the distribution system from faults. Conventional fuses, when operated, expel hot particles and gases, which could potentially ignite a fire. NWCPUD primarily uses these conventional expulsion fuses to protect its overhead circuits. However, the engineering staff is assessing current-limiting fuses and other non-sparking devices that could be used to replace conventional expulsion fuses in high fire-risk areas. Because this would be a change to a long-

standing engineering standard, PUD staff will proceed cautiously with this approach to prevent the introduction of components that might adversely affect system reliability.

4.4.2 Reclosers

Operation

Under normal operating conditions, the PUD's reclosers are set to open and close three times for incidental faults (such as an object blowing into the line) before "locking out," which indicates the presence of a more significant fault.

During high-fire risk days, Operations staff can place reclosers into "one-shot" mode, which disables the automatic reclosing function. This does not completely eliminate the possibility of an ignition, but it does reduce the number of possible ignition-producing events.

Additional Reclosers

Because the majority of the PUD's reclosers are located within its substations, placing a recloser into "one-shot" will result in the entire feeder being de-energized during a fault. Engineering staff is in the process of identifying locations to add reclosers to the periphery of the system, specifically in the areas identified in Section 3.3. This will allow Operations staff greater flexibility in placing reclosers into "one-shot" mode in these higher-risk areas without reducing the reliability of the entire feeder.

4.5 Operational Tools and Practices

The following systems, tools, and work practices aid in the mitigation of wildfires.

4.5.1 Systems and Tools

Advanced Metering Infrastructure (AMI)

The AMI system provides Operations staff with rapid notification of outages, allowing for faster response times.

SCADA (Future)

The Supervisory Control and Data Acquisition (SCADA) system is expected to be deployed in 2022. This system will allow for overall monitoring of substations and, potentially, other key distribution components. The SCADA system can allow staff to respond more quickly and to remotely place reclosers into one-shot mode.

Fleet Fire Suppression Equipment

Each fleet vehicle is equipped with the appropriate fire suppression equipment given the use of the vehicle. Table 4 identifies the equipment in each type of NWCPUD fleet vehicle.

Table 4: Fleet Fire Suppression Equipment

Vehicle Type	ID	Fire Suppression Equipment
Eng & Op Vehicles	All	Shovel, ABC Fire Extinguisher, Water Fire Extinguisher (Fire season only)
Bucket Trucks	All	Shovel, ABC Fire Extinguisher, Chainsaw w/ Spark Arrester, Water Fire Extinguisher
Digger Trucks	All	Shovel, ABC Fire Extinguisher, Chainsaw w/ Spark Arrester, Water Fire Extinguisher
Designated Fire Response Pick-up	14	Shovel, ABC Fire Extinguisher, Water Fire Extinguisher, Fire Suppression Tank (125 gal)
Foreman Pick-up	9	Shovel, ABC Fire Extinguisher, Water Fire Extinguisher
Foreman Pick-up	10	Shovel, ABC Fire Extinguisher, Water Fire Extinguisher, Fire Suppression Tank
Service Truck	3	Shovel, ABC Fire Extinguisher, Chainsaw w/ Spark Arrester, Water Fire Extinguisher
Service Truck	55	Shovel, ABC Fire Extinguisher, Chainsaw w/ Spark Arrester, Water Fire Extinguisher
Fleet ATV	58	ABC Fire Extinguisher, Water Fire Extinguisher, Fire Suppression Tank (85 gal)
Fire Water Trailer	69	Fire Suppression Tank (500 gal)
Additional Equipment		Shovels, Picks, Hoes, Portable Backpack Hand Pump Systems, 15 Extra ABC Fire Extinguishers, 6 Extra Water Fire Extinguishers

4.5.2 Work Practices

During fire season, NWCPUD Operations staff reviews the current wildfire conditions and forecast on a daily basis, using tools such as the following:

- Oregon Department of Forestry:
<https://www.oregon.gov/ODF/Fire/Pages/Weather.aspx>
- US Forest Service:
<https://www.fs.usda.gov/science-technology/fire/information>

Industrial Fire Precaution Levels

The USFS will establish the Industrial Fire Precaution Level (IFPL) for each of the zones under its control. The following is a description of each level. Details, including prohibited and permitted activities may be found by consulting the USFS website. While the NWCPUD electric system is outside of USFS-managed lands, our crews and contractors do follow the IFPL restrictions for our area.

Table 5: Industrial Fire Precaution Levels

IFPL	Description
IFPL I	Fire precautions in effect (fire season)
IFPL II	Limited Shutdown
IFPL III	Restricted Shutdown
IFPL IV	Complete Shutdown

During wildfire season, the IFPL restrictions may change daily. NWCPUD operations staff and its contractors must be aware of the current IFPL, and shift work protocols as required to comply with the active restrictions.

4.5.3 Training

Incident Command System

In 2020 NWCPUD began an initiative for all staff to receive ICS 100 training. Additional training is being held in 2021, and periodic tabletop exercises will be performed to keep staff prepared for regional disasters, including wildfires.

Fire Safety

Many field staff have been through fire safety training, and a plan is being developed to train the remaining crew. Annual refresher training will be given.

4.5.4 Interagency Collaboration

NWCPUD collaborates with other regional entities for development of strategies and disaster preparedness. These include:

- Wasco County Sheriff
- Mid-Columbia Fire and Rescue
- Oregon Department of Transportation
- Bonneville Power Administration (BPA)
- Other PUDs and Cooperatives
- Oregon Public Utility Commission

Additionally, NWCPUD has mutual aid agreements with agencies such as:

- Wasco Electric Coop
- Hood River Electric Coop
- Klickitat PUD
- City of Cascade Locks
- BPA
- APPA
- Western Regional Mutual Assistance Group (WRMAG)

5.0 RESPONSE STRATEGIES

PUD staff uses several different methods of proactively addressing the wildfire risks in our region. These are described in detail below.

5.1 Situational Awareness

PUD staff keeps informed of environmental conditions affecting the district through several channels.

5.1.1 Weather Monitoring

Operations staff monitors current and ten-day weather forecasts daily, provided by the National Weather Service (NWS) (<https://forecast.weather.gov/>). Current fire hazard conditions are also provided by the NWS Fire Weather site, which indicates the current “Fire Weather Watch” and “Red Flag Warning” conditions for the area. (<https://www.weather.gov/fire/>)

Additionally, select PUD staff are subscribed to receive automatic weather alerts via the Wasco County Citizens Alert system (<https://member.everbridge.net/index/453003085612392>).

5.1.2 Active Fire Monitoring

The status of active fires in the region is monitored at least daily during fire season via a service provided by the Oregon Department of Forestry. (<https://www.oregon.gov/ODF/Fire/Pages/FireStats.aspx>)

5.2 Operational Response

When the situational awareness indicates that it is time to take action, NWCPUD proceeds in a methodical fashion, altering operations to mitigate the growing risk.

5.2.1 Operating Procedure Changes

NWCPUD adjusts its normal operating procedures as indicated below in Table 6.

Table 6: Operational Response Strategies

Status	Response
Fire Weather Watch	<ul style="list-style-type: none"> • Monitor forecasted conditions more frequently • Monitor and adhere to IFPL requirements
Red Flag Warning	<ul style="list-style-type: none"> • Evaluate the situation for ICS activation and PSPS • Assess the application of modified relay and recloser sensitivity settings • Limit non-critical maintenance work • Monitor and adhere to IFPL requirements
Extremely Critical Risk (Red Flag Warning AND Sustained Winds > 40 mph)	<ul style="list-style-type: none"> • Evaluate the situation for ICS activation and PSPS • Activate modified relay and recloser sensitivity settings • Communicate with local emergency management organizations • Cease non-emergency maintenance work • Monitor and adhere to IFPL requirements • Patrol lines in high-risk areas identified in Table 2 • Following any outage (planned or unplanned), perform detailed downstream inspection prior to re-energizing
Fire Event (Involving PUD Assets)	<ul style="list-style-type: none"> • Active ICS • Coordinate de-energizing/re-energizing sections of line with local emergency management organizations • Implement PSPS as necessary • Make repairs and assess before re-energizing

5.2.2 Modified Recloser Settings

To mitigate the ignition risk in the areas identified in Table 2, the following reclosers will be placed into one-shot mode as described in Section 4.4.2.

Table 7: Modified Recloser Settings

Identification	Feeder	Location
B217	Feeder 17 (Rowena)	Second Street Substation
B168	Feeder 42 (Celilo)	Near Fifteenmile Rd
B526	Feeder 22 (W 10 th Street)	Near Chenowith Creek Rd
<i>Future</i>	<i>Feeder 23 (E 10th Street)</i>	<i>Cherry Heights near 13th St</i>
B515	Feeder 71 (Tygh Valley)	Tygh Valley Substation

The addition of reclosers in other select locations is in the planning stage, which will provide wildfire mitigation while preserving maximum reliability to as many customers as possible.

5.2.3 Internal Communications

Current IFPL and forecasted conditions are monitored by the Chief Operating Officer and the Operations Supervisor daily. Updates on status levels, safety precautions, and procedures are communicated to field crews daily, prior to work beginning and during crew tailboard meetings.

5.2.4 Incident Command System

An Incident Command System (ICS) is under development at this time and has been described in the Emergency Response and Restoration Plan, which will be revised to reflect the current organizational structure and capabilities. The ICS information presented below is an outline of what is expected to be in place following the completion of the PUD's ICS initiative.

The ICS is activated in response to incidents such as natural disasters and during large-scale outage events. When ICS is activated at NWCPUD, designated PUD staff fill the Command and General Staff roles as shown in Figure 4 below.

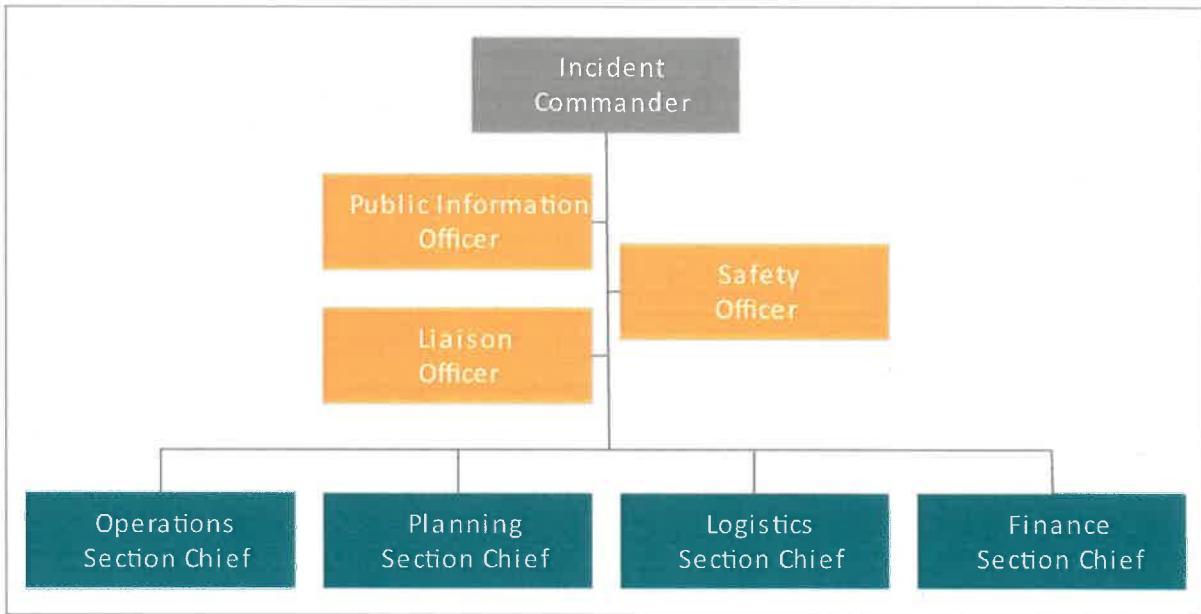


Figure 4: NWCPUD ICS Structure (DRAFT)

5.3 Public Safety Power Shutoff

Public Safety Power Shutoff (PSPS) is an option that is available, which de-energizes power lines during high-wind events combined with hot and dry weather conditions. NWCPUD uses PSPS as a last response mitigation strategy during Red Flag Warnings or Extremely Critical fire risk conditions.

5.3.1 Evaluation and Determination

The necessity, location, duration, and timeline of a PSPS activation will be determined by the Incident Commander and may be in consultation with interagency partners including, but not limited to, the US Forest Service, Wasco County Sheriff's Office, and local fire departments.

The Incident Commander will evaluate conditions and will determine when it is safe for re-energization. Prior to re-energizing a line, complete and thorough line patrols of the PSPS area will be performed by Operations staff.

Potential Risks and Consequences

When considering a PSPS, NWCPUD analyzes the potential risks and consequences of this action, including:

- Potential loss of water supply to fight wildfires due to loss of power to well pumps and other pumping facilities.
- Negative impacts to emergency response and public safety caused by disruptions to Internet and mobile phone services during extended power outages.
- Medical emergencies for members of the community who require powered medical equipment or refrigerated medications. Additionally, a lack of air conditioning can negatively impact medically vulnerable populations.
- Negative impacts on medical facilities
- Traffic congestion resulting from public evacuations in de-energized areas, resulting in longer response times for emergency responders.
- Negative economic impacts to local businesses forced to close during a power outage.
- The inability to open garage doors or motorized gates during a wildfire event could contribute to injuries or fatalities.

The risks and potential consequences of initiating a PSPS are significant and extremely complex. Based on the above considerations, NWCPUD reserves the option of implementing a PSPS when conditions dictate. While NWCPUD believes the risks of implementing a PSPS far outweigh the chances of its electric overhead distribution system igniting a catastrophic wildfire, the PSPS provides a last resort tool and another option in a crisis.

Determining Factors for PSPS

The decision to implement a PSPS is based on multiple triggers accompanied with the unique understanding of the NWCPUD electric system. No single element is determinative. Potential factors include:

- Imminent fire danger
- Critically dry vegetation that could serve as fuel for a wildfire
- Low humidity levels
- Red Flag Warnings
- Temperatures in excess of 100°F
- Winds projected beyond 40 mph in high-risk areas
- Mandatory fire orders in effect
- On-the-ground observations from NWCPUD or other agency field staff
- Active wildfire in the service territory
- Local topography

On a case-by-case basis, NWCPUD will consider de-energizing a portion of its system in response to a known public safety issue or a request from an outside emergency management/response agency.

5.3.2 Required Notifications

When planning or implementing a PSPS, the Oregon Public Utility Commission (OPUC) should be notified in order to aid in state-wide coordination efforts.

Primary	Alternate	Alternate
Lisa Gorsuch 503) 510-8769 (cell) (254) 377-4022 (satellite)	Lori Koho (503) 576-9789 (cell) (254) 377-4020 (satellite)	Kevin Hennessy (503) 881-6738 (cell)

5.3.3 Continuous Improvement

NWCPUD will actively monitor the evolution of PSPS implementation factors by other regional electric utilities and will continue to refine its evaluation criteria and response processes.

5.3.4 PSPS Communications

Internal and external communications are of the utmost importance before, during, and following a PSPS activation. The following process flow charts depict the typical communication strategies executed in the event of a PSPS activation.

Internal Communication Protocol for PSPS

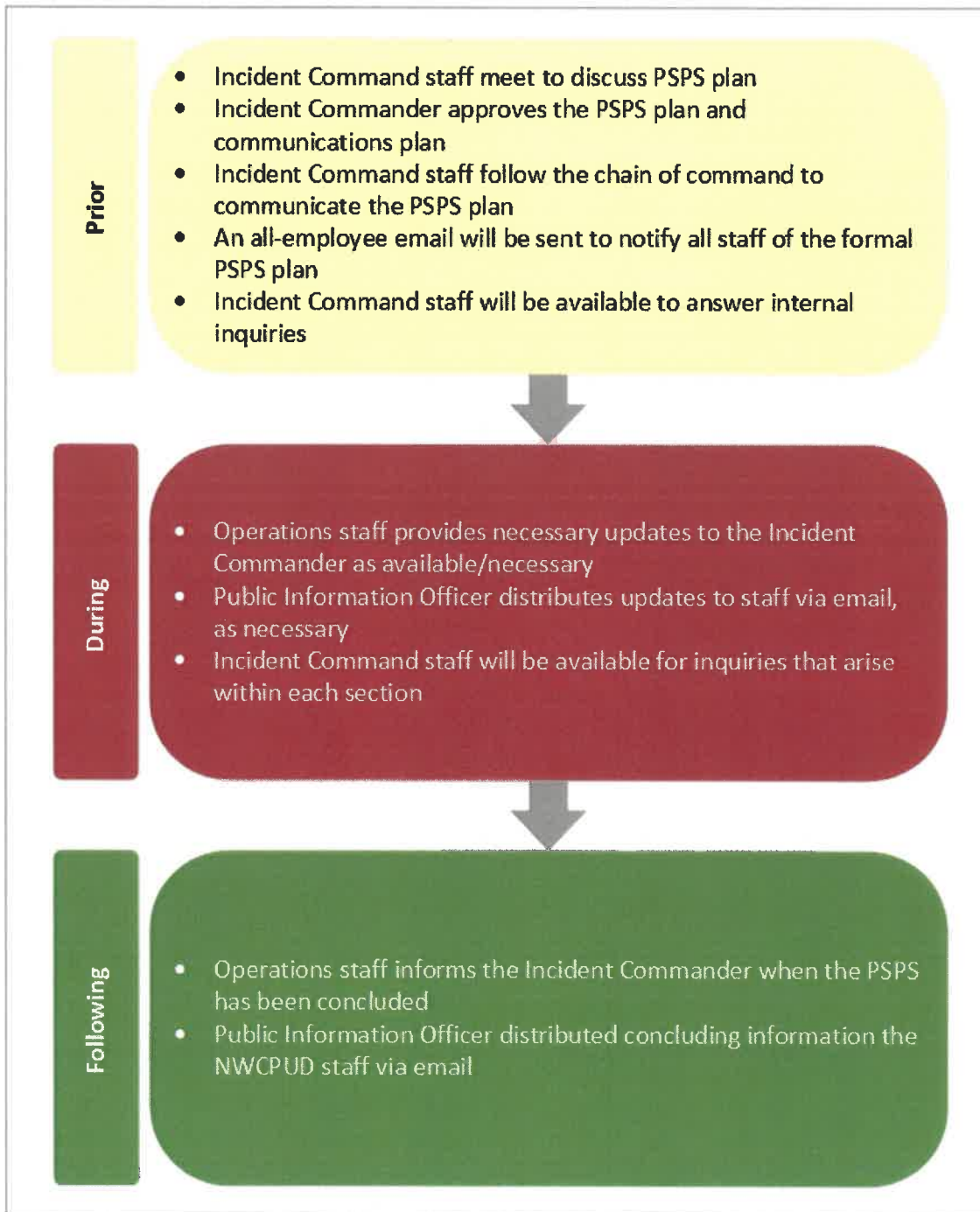


Figure 5: PSPS Internal Communications

External Communication Protocol for PSPS

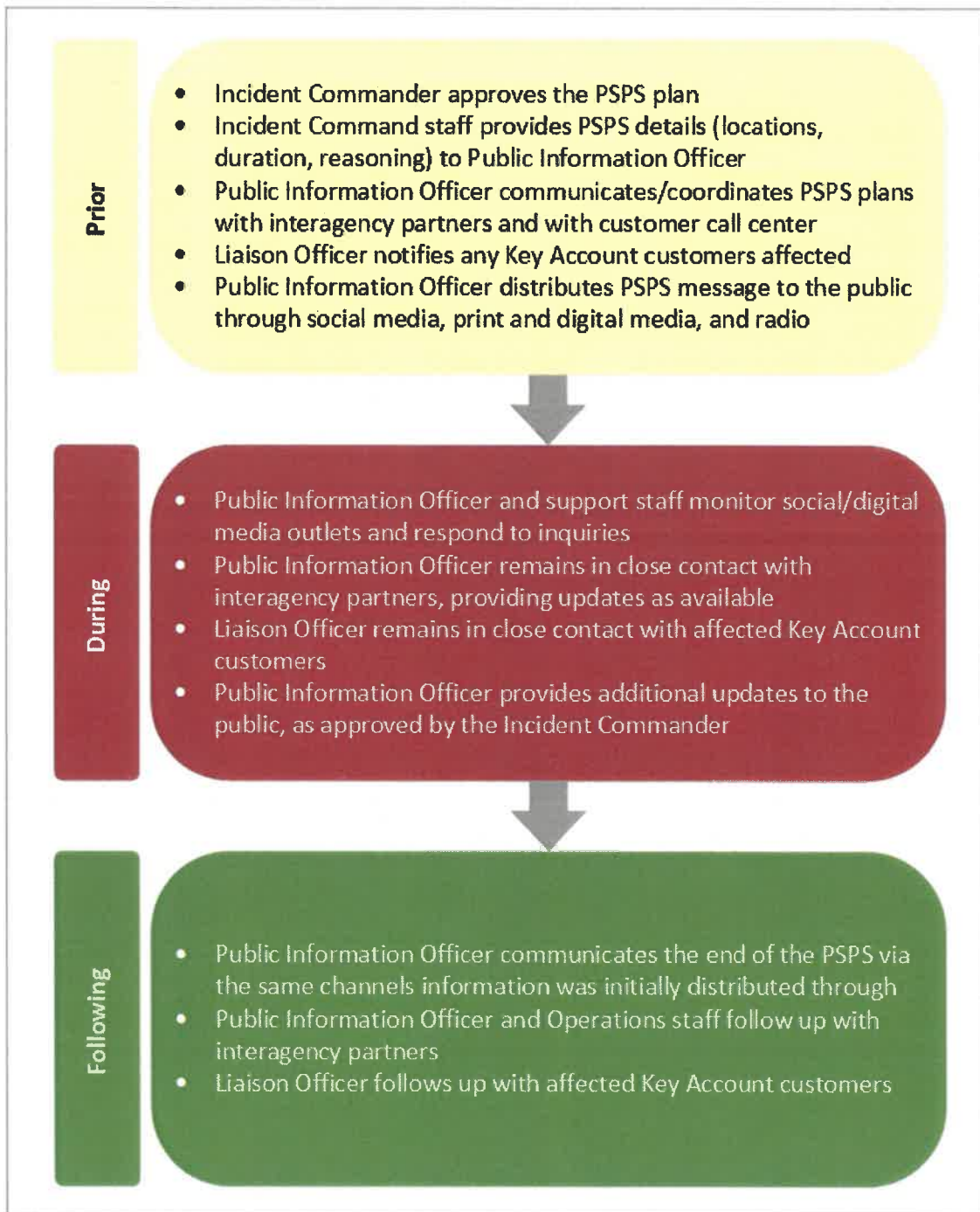


Figure 6: PSPS External Communications

6.0 PLAN MAINTENANCE AND IMPLEMENTATION

6.1 Review Cycle

This Wildfire Mitigation Plan will be reviewed on a biennial cycle and will be adapted as necessary to follow all regulations required by local and state jurisdictions.

6.2 Roles and Responsibilities

The Wildfire Mitigation is approved by the General Manager and adopted by the Board of Directors.

Operations management and other staff are responsible for maintaining the situational awareness and the state of readiness as outlined in this document. The Incident Command staff is responsible for implementing the Wildfire Mitigation Plan during wildfire events.

ADOPTED this 3rd day of August 2021.



President



Secretary