



Portland General Electric Company
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June 8, 2023

Via Electronic Filing

Public Utility Commission of Oregon
Attention: Filing Center
P.O. Box 1088
Salem, OR 97308-1088

RE: UM 2208 – Portland General Electric Company’s 2023 Wildfire Mitigation Plan

Dear Filing Center,

Portland General Electric Company (PGE) is grateful for the opportunity to comment on the Staff of the Public Utility Commission of Oregon (Staff) June 6, 2023 Public Meeting Memo (Staff Memo) regarding PGE’s 2023 Wildfire Mitigation Plan (WMP). Staff’s recommended motion is that the Commission:

Approve Portland General Electric’s (PGE or Company) 2023 Wildfire Mitigation Plan, direct PGE to submit a supplemental filing which provides a program level budget plan covering years 2023-2026, and incorporate Staff’s recommendations in its 2024 Plan.¹

PGE appreciates Staff’s acknowledgement that PGE met the compliance requirements for the WMP and supports Staff’s recommendation that the Commission approve PGE’s 2023 WMP. PGE values the significant effort made by all stakeholders during an extensive review process, and in particular, PGE appreciates Staff’s engagement efforts and the Independent Evaluator Report prepared by Bureau Veritas recommending approval of PGE’s WMP. In its comments herein, PGE seeks to address Staff’s

¹ See Staff’s June 6, 2023 Staff Memo in Docket UM 2208/page 1.

recommendation and certain comments within Staff's Memo, and provides language for an alternative motion for Commission action.

Staff's Memo implies that PGE may have approached the WMPs as a "check the box" activity, and viewed them as "rhetoric over substance" – language which is also found in Staff's memos on other utilities' WMPs. PGE interprets Staff's comments as general observations instead of a detailed exploration meant to demonstrate Staff's observations specific to PGE's 2023 WMP – or, for that matter, to any specific utility. However, even as general observations, PGE disagrees with Staff's position. PGE engaged in a robust and thorough process in developing its WMP. Following submission of PGE's 2022 WMP in December 2021, PGE almost immediately began developing its 2023 WMP. Employees throughout PGE worked continuously over the preparation of the WMP on items such as: 1) the creation of an improvement plan² based on discussions with Public Safety Partners, learnings from a PGE 2022 PSPS Annual Report,³ and a PSPS tabletop exercises; 2) wildfire risk modeling⁴ based on critical input from federal, state, and county fire agencies, egress/access considerations, detection probability, and suppression as key variables; 3) conducting in-person and virtual engagement sessions with customers and public safety partners and developing engagement strategies based on their feedback⁵; and 4) the development of a portable battery pilot for medical certificate customers during PSPS events,⁶ which was based on learnings from benchmarking peer reviews as well as interviews and site visits with California utilities.⁷

² See Appendix 8: Summary of Input from Public Safety Partners and Lessons Learned Captured During the 2022 Fire Season/page 112 of PGE's 2023 WMP.

³ Annual Public Safety Power Shutoff Report for 2022. See link: <https://apps.puc.state.or.us/edockets/edocs.asp?FileType=HAA&FileName=um2268haa9441.pdf&DocketID=23578&numSequence=3>

⁴ See Table 1: Georisk Modeling Data Sources and Cadence of Updates, page 23 of PGE's 2023 WMP.

⁵ See Section 13.3 2023 WMP Engagement Strategy/page 65-68; Appendix 3: Comments Received During PGE's 2022 WMP Engagement Sessions/page 93; Appendix 4: Inventory of Community Outreach and Engagement Materials and Channels (2022)/page 94 of PGE's 2023 WMP.

⁶ See Section 15.6/page 83 of PGE's 2023 WMP.

⁷ See Section 14 Participation in National and Internal Forums/page 76-78 of PGE's 2023 WMP.

While by no means a complete list, the aforementioned examples demonstrate the robust stakeholder input and PGE's efforts to lead a comprehensive process to develop its WMP. PGE also notes in response that it developed its first WMP in 2019 – prior to the implementation of the OPUC's wildfire rules – and has continued to demonstrate its steadfast commitment to wildfire mitigation, resiliency, and protection.

PGE agrees with Staff on the importance of instilling a collaborative and transparent WMP development process that supports shared growth amongst utilities, stakeholders, and regulators. So, it is troubling to learn that after a workshop, six multi-hour deep-dive sessions involving other utilities and stakeholders, numerous informal discussions, and PGE providing responses to over 130 information requests, Staff found the WMP assessment process to be “divisive and disruptive” or considered their requests for details to be dismissed. In comparison, when addressing PGE's efforts, the Independent Evaluator found the 2023 WMP assessment to be clear and providing confidence that future WMP's will *continue to show professionalism* and improvements.⁸ Notably, the Independent Evaluator employed as an expert witness for the Commission stated:

Portland General Electric 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.⁹

Public safety is PGE's top priority. PGE reiterates its steadfast commitment to wildfire mitigation efforts that protect the safety of the public and natural spaces and increase our system's resiliency to wildfire damage and risk mitigation. This is important work, and PGE recognizes that electric utilities are one of the many critical partners needed for the state to be successful in its pursuit of holistic and effective

⁸ Independent Evaluator Report on Wildfire Mitigation Plan Compliance Bureau Veritas North America, Inc. Portland General Electric/page 23.

⁹ *Id.*

wildfire risk mitigation efforts. PGE is committed to continually improving its wildfire mitigation program and will consider all recommendations from Staff, the Independent Evaluator, and other stakeholders when developing future WMPs.

Recommended Commission Action

Staff's Memo recommends a Commission order directing PGE to incorporate Staff's Attachment A recommendations into the 2024 WMP. PGE instead requests an opportunity to evaluate and consider Staff's 30 recommendations in the next WMP, consistent with Commission Order 22-132 on PGE's 2022 WMP. While PGE does not have immediate concerns with some of the suggestions identified in Staff's 30 recommendations, it is impractical to require their inclusion in the 2024 WMP before PGE is given the opportunity to perform any kind of meaningful review. PGE was first presented with the list of Staff's 30 recommendations when Staff's Memo was submitted to the Commission on June 6. A single day between the filing of Staff's Memo and the submission of these comments was insufficient for PGE to assess the Company's ability to incorporate the recommendations in the next WMP while still complying with applicable regulations,¹⁰ some of which require more than one planning cycle to implement. PGE respectfully requests the commission reject Staff's recommendation that PGE incorporate the recommendations listed in Attachment A of Staff's Memo and instead direct PGE to consider the recommendations in the next WMP filing. PGE willingly commits to consider Staff's 30 recommendations and continue discussions with Staff and the other IOUs.

Staff's Memo also proposes PGE be required to submit a supplemental filing to the 2023 WMP

¹⁰ See Staff Memo, Attachment A/page 1, Item 11 recommending a multiyear plan (at least four years out) be provided with project-level details, even though OAR 860-300-0020(2) 0020(2) requires WMPs be submitted on an annual basis.

with program level budget plans for the years 2023 through 2026. PGE finds this recommendation to be impractical and infeasible as PGE currently plans for and files WMPs and associated forecast cost expenditures on an annual basis. Shifting at this time to prepare a multi-year forecast supplemental filing would be unduly burdensome for PGE's wildfire mitigation team; a team whose time and effort will be better spent focusing on wildfire prevention efforts during the 2023 Fire Season. In addition, it would not be aligned or supported through planning efforts and therefore not meaningful absent a more cohesive and collective process. Unlike other utilities that may already operate with a multi-year budgeting cycle, PGE does not. PGE's budget plan was developed in conjunction with the priorities identified in the WMP. Staff's request will take significant effort and time to create meaningful forecasts.

Additionally, were the Commission not to accept Staff's request for a supplemental budget filing, it would not impede the Commission's ability to make a prudence determination. As Staff points out, "Commission acceptance of the Plan does not constitute a determination of the prudence of any individual actions discussed in the Plan. Staff understands that those individual actions, including project specific data, will be reviewed through the cost recovery process."¹¹ Since PGE and Staff agree that project specific data will be reviewed through the cost recovery process—which was recently approved by the Commission in Docket No. UE 412—the benefits from Staff's supplemental filing request are outweighed by the potential harm caused by a redirection of PGE's wildfire team's work efforts at this time.

For the reasons discussed above, PGE suggests that the Commission adopt the following motion, based on the Commission's approval of PGE's 2022 WMP in Order 22-132:

PGE is directed to engage with Staff prior to filing its 2024 Plan to allow for evaluation and consideration, with ample time, of each of Staff's recommendations outlined in the

¹¹ See Staff Memo/page 19.

Memo.

In conclusion, PGE appreciates the opportunity to provide its comments for the Commission's consideration and looks forward to further collaboration with Staff and stakeholders on future wildfire mitigation plan efforts.

Sincerely,

/s/ *WM Messner*

William M. Messner, Esq.

Senior Infrastructure Program Director, Portland General Electric Company