



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

March 7, 2022

Re: UM 2207 and UM 2208 wildfire plans and IE reports

Dear Staff and Stakeholders,

Oregon Solar + Storage Industries Association (OSSIA) appreciates the attention given to managing Oregon's electric grid in light of increased duration and intensity of wildfires. However, it is concerning that, according to the independent evaluator, neither PGE nor Pacific Power's plans fully meet the requirement to explain their decision-making process for planned expenditures based on risk-based cost and benefit analysis, and co-benefits to the utility's system. While there are urgent matters to attend to in order to prepare for the upcoming wildfire season, without planning for future resilience, we will not be able to realize the system we need for the future.

PGE and Pacific Power have the opportunity to invest in a grid that is both resilient in itself to wildfires, but also one that simultaneously provides resilience to communities in wildfire prone areas. The co-benefits to these investments should be studied carefully and implemented as soon as possible for maximum community benefit.

OSSIA also agrees with Rogue Climate's comments about the importance of using the Environmental Justice Model to evaluate the wildfire plans. Rogue Climate found that Pacific Power did not evaluate decentralized infrastructure like storage and microgrids, which are essential for allowing communities to have power in an outage. OSSIA agrees that low-income, environmental justice and medically vulnerable customers should be prioritized for solar, microgrids, back-up power and storage.

OSSIA also agrees with Rogue Climate that system hardening should be prioritized for low-income and environmental justice customers and that system hardening should be equitably distributed. OSSIA also believes that new investments with co-benefits should also be equitably distributed. Upgrading infrastructure is a critical opportunity to make other investments that would benefit communities and could end up saving ratepayers in the long run.

Thank you for your attention to these comments.

Sincerely,

Angela Crowley-Koch