



IBEW Local 125

International Brotherhood of Electrical Workers

January 8, 2021

Oregon Public Utilities Commission
PO Box 1088
Salem, OR 97308-1088

RE: AR 638 Wildfire Mitigation Plan Rulemaking Scoping Survey

Dear Chair Decker,

Thank you for the opportunity to participate in the AR 638 Wildfire Mitigation Plan Rulemaking Scoping Survey. As electrical workers, IBEW Local 125 is committed to this rulemaking because of the impact to Oregon's communities and our membership. Wildfires have continued to place stress on emergency management systems, Oregon's citizens, and the electrical grid. As such, we offer the following comments in response to the survey.

IBEW Local 125's expectations are that the Oregon Public Utility Commission allows necessary funding for the much-needed investments to create a resilient, safe, and reliable infrastructure which meets Oregon's needs even when disaster strikes. We hope that Wildfire Mitigation Plans identify safety for workers as a key component. This includes necessary equipment, manpower, and technology. It should also acknowledge the need for mutual aid between utilities which is likely to be a challenge since natural disasters are not often isolated to a single location.

Our priorities are focused on safety—our members and communities. We need to ensure that the Wildfire Mitigation Plan addresses the importance for increased and continuous vegetation management, defining proper clearance around utility assets as well as the qualifications for the men and women who perform vegetation clearance as well as line patrols. Patrols by electrically-qualified workers are needed for prevention, restoration, and rebuilding. Technology such as drones and thermal cameras should be used but must not replace or diminish the role electrically-qualified workers play in various phases. Plans must be in place for proper isolation of utility distribution and transmission systems allowing to deenergize areas when fire risks pose an immediate threat to our communities. Lastly, system hardening as a whole must not be lost. There are numerous components that can be included, and we hope cost is not the defining factor to determine the right choice. Risk management and/or cost analysis are not sufficient to making decisions which can decimate communities and forever alter families. Technology will keep changing and will likely not be inexpensive.

Our members not only work in Oregon's communities, but many live in those which are at a higher risk for wildfires. We are invested in this process and look forward to continued participation moving forward. Thank you to staff for their professionalism and efforts to create an inclusive process.

Sincerely,

A handwritten signature in black ink, appearing to read 'Travis Eri', with a stylized flourish at the end.

Travis Eri
Business Manager
IBEW Local 125

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C: Commissioner Letha Tawney
Commissioner Mark Thompson
Lori Koho
Marcy Grail, Assistant Business Manager, IBEW Local 125