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OPUC,

I want to challenge the OPUC to give consideration beyond distribution investments in UM2005. Can the OPUC help regulate internal Pacific Power manager performance and bonus structure geared toward reducing maintenance costs? Could reconductoring and preventative distribution asset maintenance be lucrative for them? Their sister company <https://www.northermpowergrid.com/> has adopted a smart grid roadmap as their incentive structure is based on SAIDI/SAIFI/CAIDI. I worked at Pacific Power from 2019-2021 as the smart grid engineer responsible for the pilot fault location, isolation, and service restoration (FLISR) project. Managers around me were asked to reduce maintenance costs while considering a fiber field area network (FAN) replacement on the failed FLISR FAN. The initial FAN co-located DA and AMI on a public 900 MHz. Instead of trying a low cost LTE FAN replacement, in at the windy pilot location, a decision was made to install fiber, partially, to reduce an annual leased line back-haul maintenance costs. The fiber justification was initially made on a weird argument by the Asset Manager that most of the potential comm. outages in pilot city were cars hitting poles not wind. I fought this and talked to the field engineer and confirmed from the outage database that multiple fully-severed-cables outages during the winter of 2020 to 2021 were due to falling trees. Despite my pleas, I felt like the decision to build out an expensive lucrative capital project like fiber was already decided on by upper management. The argument was this would be a sure fire solution. I saw it as a hypocritical claim to care about smart grid cost pressure across all customers. I left Pacific Power because I didn't see a coherent move towards a distribution automation (DA) plan. The Asset Manager, on my last day, said Pacific Powers's hands were tied until the OPUC -made- them do something. I think this -make- should include the internal manager performance drivers. Managers were asked to reduce operation and maintenance costs even when it contradicted prudent low-cost smart grid build out methods and investments. Can this be regulated to help the good internal managers at Pacific Power? LTE had already been piloted and proven at Pacific Power at the time of the fiber decision. A public or private LTE FANs would make it easy to install intelligent electronic devices (IED) across most of their service area. A small amount of annual maintenance cost is in public LTE but is nothing compared to a fiber FAN build out not to mentioned the expanded pole-replacement timeline. Even if the OPUC can help steer distribution investments in UM2005, inspiring Pacific Power management seems to be found in breaking the link between the current bonus structure and maintenance costs.

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