

March 11, 2022

VIA ELECTRONIC FILING

Public Utility Commission of Oregon
Attn: Filing Center
201 High Street SE, Suite 100
Salem, OR 97301-3398

RE: UM 2207 - PacifiCorp's Reply Comments on the 2022 WPP Evaluation

PacifiCorp d/b/a Pacific Power (PacifiCorp) respectfully submits these comments to the Public Utility Commission of Oregon (Commission) regarding stakeholder comments and the draft Independent Evaluator (IE) Report (Draft IE Report), completed by the IE, Bureau Veritas. The Draft IE Report contains the IE's evaluation of PacifiCorp's 2022 Wildfire Protection Plan (WPP), which was filed by PacifiCorp on December 30, 2021, to fulfill the requirements in Oregon Revised Statute (ORS) §592, § 3(2) and Oregon Administrative Rule (OAR) 860-300-0002. PacifiCorp appreciates the comprehensive and thoughtful nature of the IE's review and stakeholder comments. The overriding purpose of the WPP is to guide PacifiCorp's wildfire mitigation strategies in Oregon, and PacifiCorp values feedback which helps inform and improve the WPP.

I. Reply to the Draft IE Report.

As indicated in the Draft IE Report, the IE found that PacifiCorp's WPP "Met" or "Substantially Met" the IE's "Expectation of Demonstrated Compliance" on 27 of 28 individual descriptions items in the Draft IE Report. PacifiCorp notes that these 28 category descriptions reflect the IE's interpretation of the requirements in ORS §592, § 3(2) and OAR 860-300-0002. The IE's interpretation is of course not binding and should not be construed to add any

requirements to the rules previously adopted by the Commission. PacifiCorp responds with the understanding that such categories merely reflect the IE's attempt to organize material and provide a framework for its evaluation, which is generally useful for facilitating review and related discussion.

PacifiCorp found the IE's suggestions in its "Recommendations for Future WMP's" to be particularly helpful. In conjunction with any future guidance from the Commission and Commission Staff regarding those specific features of the WPP, PacifiCorp will review and integrate the IE's suggestions in the next plan update where appropriate. Without addressing every item, a few examples stand out as illustrations of how the IE's recommendations can influence future plan updates. In response to the recommendations in Subject Area 1, PacifiCorp envisions bolstering the existing risk assessment plan section with an appendix in future filings, to include additional technical information such as data inputs and data calculations. As another example, based on the recommendations in Subject Area 4, PacifiCorp will likely include examples of after-action reports created in 2022 in a future plan. And based on the recommendations in Subject Area 6, PacifiCorp will likely create and maintain a comprehensive outreach register to track 2022 outreach activities, including the date and time, type of outreach performed, target audience and impacted parties. PacifiCorp anticipates that there will be future dialogue with the Commission and Commission Staff regarding how the 28 categories identified by the IE in the Draft IE Report might be used in future reviews. PacifiCorp envisions that such dialogue will help inform how PacifiCorp incorporates the IE's recommendations in future plan updates.

As part of its Subject Area 7 evaluation, the IE noted “Partially Met” on one item: “Explanation of logic/reasoning in selected inspection practices in wildfire risk areas.” While PacifiCorp respectfully suggests that Section 2.2 of its WPP does adequately explain the logic and reasoning for the inspection practices described in Section 2.2, PacifiCorp also welcomes the opportunity to provide additional explanation on this important topic. Specifically, “[t]he IE recommends that for future WMPs, [PacifiCorp] provide reasoning, or an explanation of the analysis used for choosing the shortened inspection frequencies.”¹

In straightforward terms, PacifiCorp believes that having more frequent inspections is a good mitigation strategy because more frequent inspections should, by nature, identify a certain percentage of conditions at an earlier stage than they would have otherwise been identified with less frequent inspections. If conditions are identified at an earlier date, they will, by practice and consistent with Division 24 rules, be corrected at an earlier date. And if a particular condition exists for a shorter amount of time, that particular condition is then less likely to cause a fault event, which could lead to a wildfire ignition. PacifiCorp did not apply any particular data analytics to determine that it would be appropriate to move to a five-year cycle for detail inspections on distribution circuits and local transmission in the Fire High Consequence Area, versus the 10-year cycle allowed under the Division 24 rules. PacifiCorp notes, however, that OAR 860-024-0011(1)(b)(A) treats 10 years as a “maximum interval,” so more frequent intervals are consistent with that rule. In sum, PacifiCorp applied general operations judgment to decide that halving the time between inspections was warranted in areas of high wildfire risk.

¹ Docket No. UM 2207, Bureau Veritas Draft Independent Evaluator Report on PacifiCorp’s Wildfire Mitigation Plan at 16 (Feb. 24, 2022)

Finally, PacifiCorp recommends one correction in the Draft IE Report. The Draft IE Report states “Table 7 summarizes the findings of demonstrated compliance for Subject Area 6. All expectations of demonstrated compliance are met, except for one area being partially met”.² Table 7 shows that the expectations of demonstrated compliance in Area 6 are met and substantially met.³ There were no partially met expectations in Area 6.

II. Reply to Stakeholder Comments.

PacifiCorp also replies to the stakeholder comments submitted by Rogue Climate, filed February 24, 2022, the Hood River County Board of Commissioners, filed March 1, 2022, and Oregon Solar + Storage Industries Association (OSSIA), filed March 7, 2022. PacifiCorp values these stakeholder comments and feedback, which may inform the 2022 WPP implementation and help develop updates to future plans. For example, the clarity sought by the Hood River County Board of Commissioners highlights the benefits of continuing to do tabletop exercises with the County to prepare for Public Safety Power Shut-Off (PSPS) events. Tabletop exercises are a tool used by PacifiCorp to engage Public Safety Partners and improve the details of the plan for potential PSPS events. Stakeholder input helps PacifiCorp shape the agenda and planned topics for these tabletop exercises, and PacifiCorp envisions a focus on communication protocols and planned services to help provide Public Safety Partners with greater clarity on the PSPS plan.

Similarly, recommendations from Rogue Climate and OSSIA highlight the benefit of PacifiCorp’s planned community engagement and continued collaboration with stakeholders. PacifiCorp appreciates Rogue Climate sharing the results of its survey regarding preferred

² Docket No. UM 2207, Bureau Veritas Draft Independent Evaluator Report on PacifiCorp’s Wildfire Mitigation Plan at 13 (Feb. 24, 2022).

³ *Id.* at 14.

sources of information, which PacifiCorp will consider in reviewing its customer notification protocols. As PacifiCorp assesses updates to its WPP, including the vegetation management and system hardening elements, PacifiCorp agrees that it will continue to consult with partners, such as the Oregon Department of Forestry, United States Forest Service, and Indigenous communities.

In closing, PacifiCorp appreciates the thoughtful and comprehensive nature of the Draft IE Report and stakeholder comments. PacifiCorp's next update to its WPP will bring in many of these thoughts, elements, and recommendations.

Sincerely,

A handwritten signature in blue ink that reads "Shelley McCoy". The signature is written in a cursive, flowing style.

Shelley McCoy
Director, Regulation