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February 24, 2022

Re: UM 2207 Pacific Power Wildfire Protection Plans

Dear Public Utility Commission:

Thank you for the opportunity to share feedback on [Pacific Power's Wildfire Protection Plans](#). Rogue Climate looks forward to continuing engagement in utility wildfire processes to ensure both short-term and long-term investments on wildfire mitigation and community resilience infrastructure. It is imperative to have well-defined strategic plans to adapt our energy systems to the effects of climate change. This includes stepping away from the notion that investments made primarily on utility infrastructure will create a reliable, safe energy grid and establish public safety, especially during disruptions such as wildfires.

Rogue Climate values the community engagement efforts Pacific Power has committed to in the Wildfire Protection Plan Engagement Strategy and how intentional it is to be accessible to people from all walks of life. We look forward to participating in those opportunities and engaging community members in the process.

We also appreciate the multitude of languages available for customers to access when calling the customer care line and the various communication methods to inform customers about purposeful power shutoffs, or Public Safety Power Shut Off (PSPS). In the plans, these notification methods are mentioned: direct customer notifications, outbound calls (within 48 hours if possible), texts, email, Facebook, Twitter, public information office for press releases to news outlets.

Rogue Climate conducted a survey in Southern Oregon regarding a community resilience network and generated 115 responses. In this survey we asked, "In the future, where would be

a convenient place (digital or physical) to find information during a crisis or time of evacuation?”  
These are the top responses, starting with the highest scored response:

- Emergency alerts
- TV
- Radio
- Social media
- School campuses
- Local organizations

As Community Resource Centers (CRCs) are chosen and PSPS communications are refined, **we recommend:**

- Pacific Power taps into radio, TV, school campuses and local organizations as modes of communication for continued outreach and notifications, especially in the top 13 locations for Fire High Consequence Areas (FHCA) since they are majorly in rural areas where there is a lack of access to internet and cell phone service.
- Pacific Power should address in the plans how local emergency managers will be kept accountable to send PPS alerts to customers in an accessible and timely manner.
  - This should include PPS alert test runs before fire season to ensure notifications are disseminated correctly and identify any improvements. These test runs can be used as an opportunity to share the locations of nearby CRCs.

Though CRCs are currently only planned to be made available during purposeful power shutoffs and the current rules don't require IOUs to create CRCs, **we recommend:**

- Pacific Power explores how to establish CRCs, in collaboration with local government and community-based organizations, for other types of disruptions, including black outs, wildfires, and other severe weather. This can work in conjunction with the new rules being established under UM 2114. When the power goes out, it can be life threatening for many households. The services CRCs can provide are vital for community members, especially those in rural Oregon, to access water, air conditioning, electricity and more.

The Initiative for Energy Justice (IEJ) published a policy brief in December 2021 ("[Energy Justice in Climate Change Adaptation: Recommendations for Western States Adapting to Increased Wildfire Risk](#)") which contains policy recommendations for state utility regulatory bodies (such as the Oregon Public Utilities Commission) related to utility decision-making. These recommendations can be found in the report linked above in Section IV. Below, we have reproduced the evaluation metrics for utilities and adjusted the wording slightly to fit the

framework’s use in evaluating Pacific Power’s Wildfire Protection Plan. We then evaluate Pacific Power’s plan according to these metrics, and find that overall, the utility has not adequately incorporated energy justice into its Wildfire Protection Plan, especially in the utility’s approach to purposeful power shutoffs, or PSPS.

**Initiative for Energy Justice Model: Evaluating Pacific Power’s Wildfire Protection Plans**

Utilities will incorporate climate change into their planning	Yes - the plan includes mention of the effects of climate change and incorporating its effects into its decision-making and maintenance/upgrade actions.
Utilities will implement decentralized infrastructure technology	No - the plan does not include any discussion of backup generators, battery storage, microgrid technology, or otherwise utilizing decentralized infrastructure technology in its PSPS zones or FHCA zones.
Utilities must meet certain renewable energy benchmarks	Not discussed in this plan. This is concerning since HB2021 sets ambitious clean energy goals that utilities must align with and plan for a clean energy transition.
Utility will release equity reports regarding vulnerable customers	No - no reporting subsequent to power shutoff events is discussed in the plan.
Utilities will conduct specific outreach to individuals and households with accessibility concerns	Mixed - “appropriate notifications” to customers with “serious medical conditions” will be attempted; only phone calls, not in-person contact attempts, are discussed. “Successful contact” with a customer is not defined.
Utilities are required to phase out the use of purposeful power shutoffs, if in use	No - the plan notes that purposeful power shutoffs will be utilized for an indefinite amount of time, with no plan for phasing out their use.
The state enacts punitive measures when utilities conduct purposeful power shutoffs	No - there is no punitive measure for utilities conducting purposeful power shutoffs.

Based on this evaluation, Rogue Climate outlines the following recommendations for the utility.

## **Recommendations:**

- Pacific Power must conduct a **review of their customer database information**, especially for customers in PSPS Zones, followed by customers in FHCA Zones. Customer contact information should be verified for accuracy, and missing information (new addresses, phone numbers, email addresses, etc.) should be collected. This work should be done in partnership with local health clinics, hospitals, and healthcare professionals, not just the agency's defined public safety partners (police and fire departments).
  - Specifically, Pacific Power should focus on customers who are **low-income** and customers who are **medically vulnerable** (e.g., reliant on electricity-dependent medical devices, have underlying respiratory illnesses, mobility-based disabilities etc.). These customers should be prioritized for outreach in the event of a purposeful power shutoff. The utility should work with all medically-vulnerable customers to put together a plan for backup power generation, including lending battery storage systems to these customers, ensuring that CRC locations are accessible to these customers, and providing vouchers for hotel stays outside of the shutoff area.
  - If existing customer data is not sufficient to identify vulnerable households, Pacific Power should utilize a proxy method for prioritizing communities for power shutoff resiliency and outreach efforts which is informed by environmental and energy justice. The state of Oregon has utilized **EJSCREEN**, a federal environmental justice mapping tool developed by the EPA, in implementing state environmental policy.<sup>1</sup> Portland General Electric has also utilized EJSCREEN in order to identify environmental justice communities and comply with state energy legislation.<sup>2</sup> EJSCREEN can be used to identify populations in census tracts that are disproportionately burdened with high levels of environmental hazards and pollution.
- Pacific Power should **reimburse customers** for losses due to purposeful power shutoffs - losses may include spoiled food; loss of medication, breast milk, or formula; the cost of gas and hotel stays outside of the shutoff zone; and energy costs on a monthly bill when the customer did not have energy access. This can also take the form of coordinating with state and federal sponsored assistance, such as SNAP or TANF, to reimburse impacted enrolled families for losses covered by the programs. Utilities should look to the rules created for HB 2475 and UM 2114 to streamline these efforts and systems.

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<sup>1</sup> According to reports submitted to the State of Oregon Environmental Justice Task Force

<sup>2</sup> Specifically, PGE has published a white paper on using EJSCREEN in its operations as an appendix to its Distribution System Planning Report, found here:

<https://portlandgeneral.com/about/who-we-are/resource-planning/distribution-system-planning>

- The utility must **prioritize decentralization and redundancy efforts** in communities in PSPS Zones and FHCA, especially communities with low-income and medically vulnerable customers and environmental justice communities. These efforts include: installation of islanding technology to allow for microgrids, residential and commercial battery storage capabilities, and renewable energy generation - especially rooftop solar, all of which contribute to community resilience in the event of power shutoffs. This approach can be used in conjunction with demand-response and energy efficiency programs.
- Pacific Power should **release publicly accessible reports** after every purposeful power shutoff with information on how many customers (including medically vulnerable customers) were affected, actions the utility took to minimize the safety and health risks associated with power shutoffs, and the impact of power shutoffs on environmental justice communities.
- Pacific Power must commit to **minimizing, and eventually phasing out the use of, purposeful power shutoffs** as a wildfire management planning tool.

Outside of recommendations that stem from IEJ's adaptation policy brief, below are some other suggestions around Pacific Power integrating more consultation – with particular communities as well as with forestry experts and agencies.

#### **Regarding vegetation management:**

- Pacific Power should **consult with Indigenous communities** (both federally recognized and non-federally recognized) about traditional and current Indigenous land management strategies.
- Pacific Power should **consult with licensed arborists or corresponding Oregon state agencies or departments** to ensure that Pacific Power vegetation management practices prevent floral weakening, disease, or death leading to higher instances of wildfires for distribution and transmission.
- For annual FHCA vegetation management, Pacific Power should **consult with Oregon Department of Forestry, Federal agencies, and relevant Oregon state agencies or departments** to ensure that high-risk trees and management practices are consistent with state and federal forestry standards.
- Pacific Power should **consult with Oregon Department of Forestry biologists, foresters, and arborists**
  - to determine whether the 12 foot pruning practice for all tree species is the best practice to ensure that flora is not indirectly weakened, diseased, or dead from improper pruning, ultimately leading to increased wildfires (see 2022 Oregon Wildfire Protection Plan, Pacific Power, 27-32);

- to determine if herbicides used for vegetation regrowth is the best practice to ensure that flora is not weakened, diseased, or dead from improper application ultimately leading to increased wildfires or weakened forest health (see 2022 Oregon Wildfire Protection Plan, Pacific Power, 33).

**Regarding system hardening:**

- Pacific Power must **consult with Oregon Department of Forestry foresters and U.S. Forest Service foresters** to examine which technologies are most effective in grid hardening and reduce risks of increased wildfires.
- Pacific Power must **ensure that replacement materials in “identified areas in Oregon” are equitably distributed among all communities throughout the utility’s jurisdiction** in a timely manner. Ensuring there is consistency in replacing bare overhead wires or faulty conductors will result in reduced catastrophic events in marginalized, rural, and low-income communities without means of rebuilding post wildfire events (see 2022 Oregon Wildfire Protection Plan, Pacific Power, 35).
- Pacific Power must **ensure that system hardening methods do not consider cost before safety** when human safety and prevalence of wildfires is an issue. Oregon’s 2021 ice loading event on poorly weatherized system poles resulted in loss of power to thousands of Oregon residents in February 2021 and then catastrophic wildfires in the same service territory in the summer of 2021.
  - Safety considerations should come first, and secondary cost considerations should include whether there are just-as-safe alternatives to rely more on the distribution grid, distributed generation, and other distributed energy resources, rather than transmission lines and transmission-tied resources.
- Pacific Power should **consult with the Oregon Department of Forestry and U.S. Forest Service regarding the best technology available for covered conductors** (see 2022 Oregon Wildfire Protection Plan, Pacific Power, 36-38).
- Pacific Power should **consult with relevant Oregon state agencies and impacted environmental justice communities to determine whether underground lines for rebuild projects are consistent** with preexisting state and federal environmental laws, public safety laws, **and do not result in displacement** of low-income or marginalized communities (see 2022 Oregon Wildfire Protection Plan, Pacific Power, 38).

As changes in Oregon's climate bring more frequent and extreme weather events, it is essential for our energy system to respond and adapt to ensure community safety and resiliency. Pacific Power has the opportunity and responsibility to be a positive force for community preparedness and resiliency in the face of increasingly long wildfire seasons across the state. The central role that Pacific Power plays in the energy distribution within their territory needs to be on par with

the role they play in our community's ongoing resilience. Resilience is not something that community members and local organizations can do on their own when we are reliant on utilities for continued access to energy and future safety.

Sincerely,

A handwritten signature in black ink, appearing to read 'Alessandra de la Torre'.

Alessandra de la Torre  
Advocacy and Programs Director  
Rogue Climate