

## Wildfire Mitigation Plan Evaluation Criteria

| OAR 860-300-0002 | ID | Wildfire Protection Plans and Updates must, at a minimum, contain the following requirements as set forth in Senate Bill 762 (2021) and OAR 860-300  | Expectation of demonstrated compliance  |
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| (1)(a)(A) & (B)  | 1  | Identified areas that are subject to a heightened risk of wildfire, including determinations for such conclusions both within and outside the service territory but within the utility right-of-way.   | <p>** Describe the approach, data inputs, analysis completed, quantitative risk asset tools and techniques, and industry standards utilized to identify areas subject to heightened risk of wildfire.</p> <p>** Describe analysis to both evaluate risk from the environment and specific utility asset types (if considered).</p> <p>** Describe process that will be followed to evaluate areas on an annual basis.</p>   |
| (1)(b)           | 2  | Identify means of mitigating wildfire risk that reflects a reasonable balancing of mitigation cost with the resulting reduction of wildfire risk.  | <p>** Describe the main activities being utilized to reduce wildfire risk, how they reduce risk, and how the utility's planned chosen activities balance costs with effectiveness of reducing wildfire risk.</p> <p>** Describe how the effectiveness of the activities will be measured, or have been measured.</p>  |
| (1)(c)           | 3  | Identify preventative actions and programs that the utility will carry out to minimize the risk of utility facilities causing wildfire.  | What falls out of the risk assessment as high level risk, priorities and quantitative results from the preventative actions or programs.  |
| (1)(d)           | 4  | Demonstration of outreach efforts to regional, state, and local entities, including municipalities regarding a protocol for the de-energization of power lines and adjusting power system operations to mitigate wildfire, promote the safety of the public and first responders and preserve health and communication infrastructure. | <p>** Provide geographical boundary of impacted areas of the service territory that may be affected by a PSPS event or modified power system operations.</p> <p>** Provide list of specific regional, state and local entities, including municipalities, who have been reached out to, when are they reached out to, who will be reached out to, and the results of the outreach. Provide detail of topics covered, and input from agencies that have impacted utility wildfire risk reduction planned activities.</p> |

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| (1)(e) | 5 | Identified protocol for the de-energization of power lines and adjusting of power system operations to mitigate wildfires, promote the safety of the public and first responders and preserve health and communication infrastructure. | <p>** Overview of steps completed by the utility leading up to a PSPS, and closing a PSPS event.</p> <p>** Detailed descriptions of each step of the process, including: information used and analysis completed to make decisions for the steps, utility staff involved in the steps and the utility decision-maker(s), interaction with entities outside of the utility that impact decisions, communication protocols (internal and external), typical duration of each step.</p> <p>** Description of adjusted power system operations to mitigate wildfire, and description of operations in none wildfire threat conditions. Include details of: information used and analysis completed before adjusting operations, utility staff involved with adjusting operations, reasoning/logic to specific operational choices.</p> <p>** Describe vulnerabilities to stakeholders such as emergency responders and public safety officials when de-energizing of the system occurs and what is necessary to communicate when a re-energization occurs due to an emergent situation and how they are defined.</p> |
| (1)(f) | 6 | Identification of the community outreach and public awareness efforts that the Public Utility will use before, during and after a wildfire season.   | <p>** Comprehensive list of completed community outreach and public awareness effort types, and planned (new or repeat type of engagement and outreach) effort types in 2022.</p> <p>** Detailed description of each activity: content and messaging of outreach and communication, why it was chosen, it's expected audience, it's expected impact, measures to ensure communication techniques are successful in reaching the target audience, who from the utility supports the effort, outside organizations who support the effort, and when it is planned (before, during and after wildfire season).</p>  |

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| (1)(g) | 7 | Description of procedures, standards, and time frames that the Public Utility will use to inspect utility infrastructure in areas the Public Utility identified as heightened risk of wildfire.      | <p>** Description of inspection activities in non-high wildfire risk areas, separated by distribution and transmission (inspection types, frequencies, correction protocols).</p> <p>** Description of procedures and standards utilized to guide inspection activities in wildfire risk areas.</p> <p>** Description of inspection activities in wildfire risk areas, detailed by miles and structures of impacted distribution and transmission assets, inspection types and methods, frequency, infraction categorization, infraction protocol.</p> <p>** Explanation of logic/reasoning in selected inspection practices in wildfire risk areas.</p>   |
| (1)(h) | 8 | Description of the procedures, standards, and time frames that the Public Utility will use to carry out vegetation management in areas the Public Utility identified as heightened risk of wildfire. | <p>** Description of vegetation management activities in non-high wildfire risk areas (trimming and clearing protocol and frequency, inspection frequency, QA/QC program, separated by transmission and distribution).</p> <p>** Description of vegetation management activities in wildfire risk areas, detailed by miles and structures of impacted distribution and transmission assets, trimming and clearing protocol and frequency, inspections, QA/QC program (separated clearly between distribution and transmission activities).</p> <p>** Explanation of logic/reasoning in selected vegetation management practices in wildfire risk areas.</p> <p>** Describe the process for reviewing practices and methods to ensure effectiveness with plan procedures.</p> |

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| (1)(i) | 9  | Identification of the development, implementation, and administrative costs for the plan, which includes discussion of risk-based cost and benefit analysis, including consideration of technologies that offer co-benefits to the utility's system.   | <p>** Summary of plan activities that are incremental costs to "baseline" utility operations.</p> <p>** Two detailed tables, one for capital costs and one for expense (O&amp;M) costs, with annual costs for each plan activity, and a forecast of costs for the activities described in the plan that are anticipated to go beyond 2022.</p> <p>** Summary discussion of decision making process on planned expenditures, based on risk-based cost and benefit analysis, and co-benefits to the utility's system.</p>                       |
| (1)(j) | 10 | Description of participation in national and international forums, including workshops identified in section 2, chapter 592, Oregon Laws 2021, as well as research and analysis the Public Utility has undertaken to maintain expertise in leading edge technologies and operational practices, as well as how such technologies and operational practices have been used develop implement cost effective wildfire mitigation solutions | <p>** Comprehensive list of national and international forums and state workshops attended by utility staff, and nature of participation in the forums and workshops (who attended from the utility, who presented from the utility).</p> <p>** Research and analysis the utility is doing or has completed regarding leading edge technology and operational practices.</p> <p>** Results of research and analysis of technology and operational practices that have been implemented into cost-effective wildfire mitigation solutions.</p> |