

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UM 2207

In the Matter of

PACIFICORP, dba PACIFIC POWER,

2022 Wildfire Mitigation Plan.

ORDER

DISPOSITION: STAFF'S RECOMMENDATION ADOPTED

This order memorializes our decision, made and effective at our April 21, 2022 Special Public Meeting, to adopt Staff's recommendation in this matter and approve PacifiCorp's 2022 Wildfire Mitigation Plan. PacifiCorp is directed to engage with Staff and stakeholders through a workshop process prior to filing its 2023 Plan to allow for consideration, with ample time, of each of Staff's recommendations outlined in the memo. The Staff Report with the recommendation is attached as Appendix A.

Made, entered, and effective Apr 28 2022.



Megan W. Decker
Chair



Letha Tawney
Commissioner



Mark R. Thompson
Commissioner

A party may request rehearing or reconsideration of this order under ORS 756.561. A request for rehearing or reconsideration must be filed with the Commission within 60 days of the date of service of this order. The request must comply with the requirements in OAR 860-001-0720. A copy of the request must also be served on each party to the proceedings as provided in OAR 860-001-0180(2). A party may appeal this order by filing a petition for review with the Circuit Court for Marion County in compliance with ORS 183.484.

**PUBLIC UTILITY COMMISSION OF OREGON
STAFF REPORT
SPECIAL PUBLIC MEETING DATE: April 21, 2022**

REGULAR X CONSENT _____ EFFECTIVE DATE _____ Upon Commission Approval

DATE: April 14, 2022

TO: Public Utility Commission

FROM: Lori Koho, Yassir Rashid, and Lisa Gorsuch

THROUGH: Bryan Conway **SIGNED**

SUBJECT: PACIFICORP:
(Docket No. UM 2207)
2022 Wildfire Mitigation Plan – Request for Commission Approval.

STAFF RECOMMENDATION:

Approve PacifiCorp’s (Pacific Power or Company) 2022 Wildfire Mitigation Plan and direct Pacific Power to incorporate Staff’s recommendations in its 2023 Plan.

DISCUSSION:

Issue

Whether the Oregon Public Utility Commission (Commission) should approve Pacific Power’s 2022 Wildfire Mitigation Plan and direct Pacific Power to work with Staff and stakeholders to incorporate Staff’s recommendations in the Company’s 2023 plan.

Applicable Rule or Law

Per ORS 756.040, the Commission has authority to supervise and regulate every public utility in Oregon, and to do all things necessary and convenient in the exercise of such power and jurisdiction. Under ORS 756.060, the Commission may adopt reasonable and proper rules relative to all statutes administered by the Commission.

ORS 757.035(1) provides the Commission with the authority to adopt safety rules and Regulations.

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Executive Order 20-04 (EO 20-04), Section 5(B)(4) directs the Commission to evaluate electric companies' risk-based wildfire protection plans and planned activities to protect public safety, reduce risks to utility customers, and promote energy system resilience in the face of increased wildfire frequency and severity, and in consideration of the recommendations made by the Governor's Council on Wildfire Response 2019 Report and Recommendations.

Senate Bill (SB) 762 (2021)¹ is a comprehensive bill, which established standards for electric utility's Wildfire Mitigation Plans. Relevant sections of SB 762, specific to requirements to be included in electric utility Wildfire Protection Plans (Plans) and the requirement for the Commission to promulgate rules related to the requirements of those plans have been incorporated in the Commission's statutes ORS 757.960 through 757.969.

OAR 860-300-0020 articulates the minimum requirements for Wildfire Mitigation Plan filings as well as the process for Commission approval of the plans.

Analysis

Background

On December 30, 2021, Pacific Power filed its risk-based Wildfire Mitigation Plan (WMP or Plan) with the Commission. Under SB 762 (2021) and Oregon Administrative Rule (OAR) 860-300-0020, public utilities in the State of Oregon must adopt and operate in compliance with an annually updated WMP that is filed with the Commission. Staff and Bureau Veritas North America, Inc. (BVNA), an Independent Evaluator (IE), have evaluated the 2022 Plan. BVNA was selected through a competitive bidding process to serve as an Expert Witness and to provide written testimony to assist in Staff's overall analysis and review of the Plan for rule compliance, and to make recommendations about Plan approval that may include conditions (i.e. future actions and/or additional requirements/updates for inclusion in upcoming year's Plan).

Staff's analysis, detailed below, considers Pacific Power's compliance with the Wildfire Mitigation Plan minimum requirements set forth in OAR 860-300-0020. The comments, recommended actions, and recommended additional requirements for inclusion in the Company's 2023 Plan, reflect Staff's review of the Company's WMP, review of the IE's Report, review of Stakeholder Comments, and ongoing participation in WMP public workshops and Stakeholder engagement. In addition to written stakeholder comments, Staff and the IE consulted with emergency managers in some local jurisdictions to gain insight into perceptions by the local community of the effectiveness of the utility's community outreach efforts.

¹ Section 3, chapter 592, Oregon Laws 2021, available at [SB0762 \(oregonlegislature.gov\)](https://legislature.oregon.gov/bills/2021/SB0762).

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BVNA developed specific assessment criteria for evaluation of the utility WMPs. The criteria were, in many cases, more rigorous and detailed than the requirements in OAR 860-300-0020. These standards have provided a view into the components of a more robust Plan, but did not alter Staff's determination of compliance with the 2022 Plan requirements. Additionally, the IE used evaluation rankings of "Met," "Substantially Met," "Partially Met," and "Not Met." Staff did not adopt this ranking system. Staff's analysis resulted in a conclusion that the utility either met the requirement or didn't. However, in most cases, even when Staff determined the utility met the requirements of a specific requirement, Staff provided recommendations that will enhance the Company's future Plans and provide more evidence that the Company's Plan is risk based. Many of Staff's recommendations are based on or supported by recommendations made by the IE.

The IE's Report and stakeholder comments can be found in Docket No. UM 2207.²

Plan Compliance Review and Recommendations by Section

OAR 860-300-0020 (1)(a)(A) & (B):

Identified areas that are subject to a heightened risk of wildfire, including determinations for such conclusions, and are: (A) Within the service territory of the utility, and (B) Outside the service territory of the utility but within the utility's right-of-way for generation and transmission assets.

Staff Analysis:

Pacific Power met this requirement by describing the approach it used to conduct its analyses in identifying areas subject to Fire High Consequence Areas (FHCA). Pacific Power provided description of the data, industry standards, and techniques used to identify FHCA.

Pacific Power identified areas of elevated wildfire risk in their Oregon service territory and rights-of-way and referred to them as Fire High Consequence Areas (FHCA). The FHCA includes approximately 2,687 miles of overhead lines, comprising 16 percent of the total overhead transmission and distribution lines. Pacific Power used computer modeling to analyze various data sets as a way for risk analysis that focuses on the potential impact in terms of harm to people and damage to property. In addition, Pacific Power examined the FHCA to identify areas of "most extreme risk," called Public Safety Power Shutoff (PSPS) Zones. The PSPS Zones include 1,336 overhead distribution miles, comprising 16 percent of the total overhead transmission and distribution lines;

² Wildfire Mitigation Plan with conditions including additional actions and requirements for the Company's 2023 Plan as set forth in the conclusion below.

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no overhead transmission miles; and 21,105 customers. While Pacific Power reviewed different parameters such as fire weather patterns, with wind patterns, vegetation, and population to define the PSPS Zones within the FHCA, Pacific Power provided no detail of the analysis depicting specific methodology and assumptions in the WMP. Pacific Power analyzed records of unplanned outages over seven years to measure the risk of utility assets. Outage types identified possible correlation to ignition potential including equipment failure, and operational and tree-related preventable outages. Pacific Power provided no information regarding which specific utility asset pose the highest fire risk. Pacific Power does state the recognition and understanding that advanced fire risk modeling methodologies exist and that they plan to evolve and assess their wildfire risk model.

Staff Recommendations for Pacific Power's 2023 Plan:

1. Pacific Power include details of the analysis completed to identify the PSPS Zones, as well as the industry approach taken, and resources involved in the map decision-making. With the PSPS Zones designating where PSPS's may take place, and where budget is being spent hardening infrastructure, it is important to clarify the measures taken to identify the PSPS Zones.
2. Pacific Power include details of the analysis completed to identify the riskiest specific asset features, such as conductor type. With distribution hardening projects in the PSPS Zones projected to take eight years, understand how projects are being prioritized based on varying asset risk levels.

OAR 860-300-0020 (1)(b):

Identified means of mitigating wildfire risk that reflects a reasonable balancing of mitigation costs with the resulting reduction of wildfire risk.

Staff Analysis:

Pacific Power met this requirement by describing 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. Pacific Power described how the effectiveness of the activities would be measured, or have been measured.

Pacific Power identified multiple activities it utilized to reduce fire risk, as well as how they reduce wildfire risk. Those activities include risk modeling, inspection programs, vegetation management, system hardening, and other measures. Pacific Power also outlines core principles that guide their WMP investments. It would have been beneficial if Pacific Power provided a history of wildfires in Pacific Power's service

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territory, and what portion of those wildfires that were identified as being caused by Pacific Power utility assets. Such inclusion would provide context and trends over time to assist in measuring the value of the risk reduction investments.

Stakeholder Comments:

In its written comments, Oregon Solar + Storage Industries Association (OSSIA) stated its concern that Pacific Power's WMP does not fully meet the requirement to explain their decision-making process for planned expenditures based on risk-based cost and benefit analysis and co-benefits to the utility's system.

Staff Recommendations for Pacific Power's 2023 Plan:

3. Pacific Power include the analysis of comparing measured risk reduction of plan activities to their costs, a cost-benefit analysis.
4. Pacific Power include a description of how the overall effectiveness of the plan activities will be measured, as well as information on wildfires in the service territory for the prior year.

OAR 860-300-0020 (1)(c):

Identified preventative actions and programs that the utility will carry out to minimize the risk of the utility's facilities causing wildfire.

Staff Analysis:

Pacific Power met this requirement by identifying preventative programs that the utility will carry out to minimize the risk of the utility's facilities causing wildfire. The preventive programs implemented enables Pacific Power to collect information that helps determine high-level risk, and accordingly set its priorities to minimize the wildfire risk.

Specifically, these activities include inspection programs, vegetation management, system hardening, situational and conditional awareness, system operations, field operations, and PSPS implementation. Pacific Power described each action and how it would be executed. Pacific Power described how each action would minimize the risk of utility facilities causing a wildfire.

Staff agree with the IE recommendation that future WMPs include details of how the objectives of individual key preventative actions have been or have not been met, from the prior year of system operation. Future WMP should further demonstrate to what degree the preventable measure has reduced the risk of the utility's infrastructure from the cause of fire.

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Stakeholder Comments:

Rouge Climate also stated that Pacific Power should consult with relevant state and federal agencies to ensure that system hardening projects does not compromise the safety of the communities that occupy FHCA. Rouge Climate stated that when considering system hardening projects, Pacific Power should not consider cost before safety, and that those projects should be distributed equitably throughout its service area.

Staff Recommendations for Pacific Power's 2023 Plan:

5. Pacific Power provide details of how the objectives of individual key preventative actions have been met or not met, from the prior year of system operation.
6. Pacific Power further demonstrate to what degree the preventable measure has reduced the risk of the utility's infrastructure from the cause of fire.

OAR 860-300-0020 (1)(d):

Discussion of the 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 wildfires, promote the safety of the public and first responders, and preserve health and communication infrastructure.

Staff Analysis:

Pacific Power met this requirement by explaining its outreach efforts to regional, state, and local entities regarding de-energization of power lines.

Pacific Power describes compliance with 1(d) beginning largely on page 61 through page 62 under the heading *Public Safety Partners and Critical Facilities*, and on page 66 under the heading *9. Public Safety Partner Coordination Strategy* and subsection *Tabletop Exercises*, but it also discussed in other sections of the Plan.

The WMP includes, but is not limited to, an overview the criticality of the communication, a general list of the critical partners/entities, general description of the content of the outreach (i.e. geographic shapefiles with boundaries for areas subject to de-energization), cadence of outreach, and how the Company will support emergency alert efforts. In addition, the Company describes how it may support a community impacted by de-energization (i.e. through Community Resource Centers or CRCs).

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Staff recommendations for Pacific Power's 2023 Plan:

7. Pacific Power include clarification about Community Resource Centers (CRC) in its 2023 WMP Update, to include:
 - Whether CRCs will be activated by the Company in every instance of a PSPS, and
 - How and when local emergency management will be notified about whether a CRC will be activated for critical preparation in meeting the needs of the impacted community.

8. Pacific Power provide clarification about Community Resource Centers (CRC) in its 2022 emergency training and exercise imminent events, to include:
 - Whether CRCs will be activated by the Company in every instance of a PSPS, and
 - How and when local emergency management will be notified about whether a CRC will be activated for critical preparation in meeting the needs of the impacted community.

OAR 860-300-0020 (1)(e):

Identified protocol for the de-energization of power lines and adjusting of power system operation to mitigate wildfires, promote the safety of the public and first responders, and preserve health and communication infrastructure.

Staff Analysis:

Pacific Power met this requirement to describe its PSPS protocol by explaining its protocol for de-energization of power lines.

The company describes its protocol in compliance with 1(e) beginning, largely on page 58 through page 61 under the heading *8. Public Safety Power Shutoff (PSPS) Program* and under subsections *8.1 INITIATION*, *Fuels Assessment*, *Critical Fire Weather Assessment*, *Critical Fire Weather Assessment*, *Assessing the Potential for Weather-Related System Impacts*, *8.2 De-energization Watch Protocol*, and *8.3 De-energization protocol*, but it is discussed in other sections of the Plan.

The plan includes an overview of actions leading up to a PSPS until power is restored, what is considered in the development of the actions, Company personnel and external resources involved in PSPS actions, the length of each PSPS stage or action, and known vulnerabilities to all who are impacted by and responding to a de-energization event is detailed in the Plan.

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The Company is modifying some of its existing system operations for transmission lines and distribution circuits to mitigate wildfire risk. Modifications include more frequently disabling distribution reclosers and employing modified relay settings and patrolling prior to line testing. Additionally Pacific Power is installing Communicating Fault Current Indicators (CFICs) to better remotely pinpoint fault locations.

Staff Recommendation for Pacific Power's 2023 Plan:

9. Pacific Power include a more robust description for the re-energization stage of a PSPS in its 2023 WMP Update, to include:
 - Re-energization procedures, and
 - Timing, including factors that affect timing for power restoration actions.
10. Pacific Power include previous year's lessons learned regarding de-energization of power lines in its 2023 WMP Update, to include:
 - Findings from after action reports, including survey results, from exercises and actual events (when available).
11. Pacific Power include more information on where and when the modifications to its power system are being deployed.
12. Pacific Power include more information on what conditions trigger the modifications, who makes the decision to modify operations, and the analysis used to make such decision.

OAR 860-300-0020 (1)(f):

Identification of the community outreach and public awareness efforts that the utility will use before, during, and after a wildfire season.

Staff Analysis:

Pacific Power met this requirement by listing and describing its community outreach and public awareness efforts.

Pacific Power describes its protocol in compliance with 1(f) beginning largely on page 67 through page 72 under the heading *10. Wildfire Protection Plan Engagement Strategy* and under subsection *Wildfire Protection Plan Forums*, and the heading *11. Education and Awareness Strategy* and under subsections *11.1 Media Campaign*, *11.2 Supporting Collateral and Media Outreach*, *11.3 Customer Service Training*, *11.4 Webpage*, and *11.5 Webinars*, but it is discussed in other sections of the Plan.

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Stakeholder Comments:

Stakeholder comments pertaining to the requirements of OAR 860-300-0020 1(d), (e), and (f), were filed by Hood River Board of Commissioners, Rogue Climate, and Pacific Power and reviewed by Staff.

Staff Recommendations for Pacific Power's 2023 Plan:

13. Pacific Power include enhanced description of the outreach efforts in its 2023 WMP Update, to include:

- Examples of messaging;
- Selection process for methods of outreach;
- Determination of target audience;
- Metric and criteria used to evaluate effectiveness of outreach;
- Outcome of previous year's outreach evaluation;
- Description of Company personnel and external resources responsible for outreach efforts; and
- Description of timing of the outreach, including before, during, and after wildfire season.

14. Pacific Power include a discussion about community outreach and public awareness efforts as part of its 2022 emergency training and exercise imminent events, to clarify these activities, and to solicit input from participating Stakeholders.

OAR 860-300-0020 (1)(g):

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.

Staff Analysis:

Pacific Power met this requirement by providing description for the inspection activities and corrective measures in FHCAs and non-FHCAs.

In its WMP, Pacific Power indicated that it is supplementing its existing overhead electric asset inspections and corrections program in the FHCAs by creating a fire threat classification for specific Condition Codes, increasing inspection frequencies in the FHCAs, and reducing correction timeframes for fire threat conditions.

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Pacific Power indicated that it is also performing enhanced inspections annually utilizing infrared technology to gather information about the condition of its assets using a helicopter flying over lines that are located in FHCAs. Pacific Power conducts detailed inspections of assets located in FHCAs every five years for power lines with voltage rating less than 200 kilovolts and every two years for power lines with voltage rating more than 200 kilovolts. Pacific Power's pole test and treat program in FHCAs occurs every 10 years.

If the inspection determined there is an imminent risk for wildfire, then corrective action will take place immediately. If the inspection determined there is a high risk for wildfire, then corrective action will take place within 90 days. If the inspection determined there is a low to moderate risk for wildfire, then corrective action will take place within 12 months.

Staff Recommendation for Pacific Power's 2023 Plan:

15. Pacific Power provide reasoning, or an explanation of the analysis, used for choosing the shortened inspection frequencies. For example, for overhead distribution and transmission less than 200 kV, the detailed inspection frequency is shortened from 10 to 5 years in FHCAs. No summary of the analysis is provided that supports the inspection frequency, such as the type and volume of fire threat conditions found in FHCAs historically or fire threat conditions in the FHCAs that have caused wildfires in the past. It is unclear what information drove the decisions of the FHCA inspection frequencies chosen. Supportive information demonstrating how historical efforts have confirmed the success of modified procedural or operational changes is lacking.

OAR 860-300-0020 (1)(h):

Description of the procedures, standards, and timeframes that the utility will use to carryout vegetation management in areas it has identified as heightened risk of wildfire.

Staff Analysis:

Pacific Power met this requirement by providing description for the vegetation management activities and corrective measures in both FHCAs and non-HFCAs. Pacific Power provided information about vegetation inspection and trimming frequency protocols in both categories of transmission and distribution. Pacific Power provided description of vegetation management activities in wildfire risk areas, detailed by miles and structures of impacted distribution and transmission assets.

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In its WMP, Pacific Power indicated that it is transitioning from a four-year vegetation inspection and trimming cycle to a three-year cycle. Additionally, Pacific Power is supplementing its existing vegetation management program in the FHCAs by completing annual vegetation inspections for all lines or portions of lines in the FHCAs; by increasing minimum post-work clearances to 12 feet of pruning for distribution circuits in the FHCAs. Additionally, it is implementing pole clearing that begins at the ground with a ten-foot radius cylinder up to eight feet vertically, for poles with equipment in the FHCA. Vegetation management focuses on maintaining minimum clearance between the utility infrastructure and the vegetation around those infrastructures. Pacific Power makes a distinction between the ways it approaches clearance specifications as they relate to distribution lines as opposed to transmission lines and provides tables that contain clearance information.

Stakeholder Comments:

In its written comments, Rouge Climate stated that Pacific Power should consult with indigenous communities, licensed arborists, and various federal and state agencies to ensure that vegetation management practices are performed according to standards.

Staff Recommendation for Pacific Power's 2023 Plan:

16. Pacific Power provide more information regarding their quality control/quality assurance program and audits for vegetation management work completed in the FHCAs; measures employed, frequency, and resource types.
17. Pacific Power provide any analysis of historical events pertaining to Pacific Power's power lines, specific equipment type, vegetation, and wildfires.

OAR 860-300-0020 (1)(i):

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.

Staff Analysis:

Pacific Power met the requirement of this rule by providing a description of costs as well as tables that show the predicted budgets over a five year period.

While the IE determined the Company "Met" and "Substantially Met" its criteria in evaluating the Company's compliance with this rule, there is little discussion about the cost and benefit analysis. For this reason, Staff believes the Company fell short of the

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intent of the rule. The Company provided a detailed matrix of investments it plans to make over a five year horizon. It discussed potential co-benefits of investments and opined on examples of the benefits of planned investments.

The Company discussed investments that appear obvious for reducing risk of ignitions and outages, but doesn't mention options or provide the crucial risk-based cost benefit analysis. The Company could have provided examples of potential solutions with cost and benefit to demonstrate that Pacific Power is making the best choices for ratepayers. Ideally, this would be tied to best practices and innovative options identified participating in activities described in OAR 860-300-0020 (1)(j) or research performed by the company itself.

Staff Recommendations for Pacific Power's 2023 Plan:

18. Pacific Power include a summary of the quantitative analysis used in the choice and prioritization of specific solutions and investments.
19. Pacific Power discuss the impact of participation in expert forums on identification of solutions most like to provide the benefits anticipated. This should include:
 - Cited research, reports, and studies used in any analysis, unless the source is confidential.
 - How the factors unique to the Company's facilities and service territory were used when considering the applicability of specific options to its systems.

OAR 860-300-0020 (1)(j):

Description of participation in national and international forums, including workshops identified in section 2, chapter 592, Oregon Law 2021, as well as research and analysis the 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 to develop and implement cost effective wildfire mitigation solutions.

Staff Analysis:

Pacific Power met the requirement of this rule. Staff appreciates the Company providing specific examples of projects it is participating in as a result of these relationships.

The Company described its participation in a number of forums where it can collaborate with peers as well as national and international experts. The Company provided examples of where it has partnered with Texas A&M University in piloting the use of Distributed Fault Anticipation technology. These devices are being tested the capability

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of advanced fault detection. The Company also described how it is working with the Oregon Department of Forestry in installing wildfire cameras in high risk locations.

Staff agrees with the IE's comments that the Company did not provide details of what it may have learned through the various forums it participates in.

Staff Recommendation for Pacific Power's 2023 Plan:

20. Pacific Power include more specifics on what it has learned by participating in these groups. Staff would like assurance the Company is leveraging the learnings from other utilities to facilitate implementation of solutions with the highest benefit cost ratio.

Stakeholder Comments Related to Overall Plan:

Staff appreciates the time, effort, and insight provided in Stakeholder comments. Recommendations submitted in comments were considered in Staff's overall review, analysis, and recommendations for Pacific Power's WMP efforts for Commission consideration.

Rogue Climate³

Rogue Climate provided extensive comments about Pacific Power's Plan and found the Plan didn't meet most of the standards identified by the "Energy for Justice Model." Rogue Climate also outlined recommendations for identification and considerations for prioritization and outreach for medically vulnerable and low-income communities. While Staff applauds the intent of these standards and recommendations, it notes that they are not indicative of compliance with the 2022 requirements for WMPs. Rather Staff is considering additional Plan requirements in the AR 638 rulemaking.

Rogue Climate provided recommendations for issues to be considered for both vegetation management and system hardening. Many of the items suggested are practices the utilities already engage in such as consulting with Oregon Department of Forestry, US Forest Service, and Bureau of Land Management. Many of these conversations have been facilitated through workshops facilitated by the Oregon Wildfire Electric Collaborative.

In general, the comments provide many ideas for consideration when Pacific Power is developing its plan for 2023.

³ <https://edocs.puc.state.or.us/efdocs/HAC/um2207hac17031.pdf>.

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Hood River County Board of Commissioners⁴

Comments from the Hood River County Board of Commissioners (Board) were generally supportive of Pacific Power's plan, but did provide some recommendations. These were clear and focused on the needs in their community. The majority of the concerns would be addressed through additional conversations with the communities. Staff also believes several of the Board's concerns will be addressed in the AR 638 rulemaking.

Oregon Solar + Storage Industries Association (OSSIA)⁵

OSSIA's comments echoed many of those made by Rogue Climate. Energy and environmental justice assessment methodologies are being explored in many venues, but the Commission did not set that as a requirement for these Plans. OSSIA also suggested both PGE and Pacific Power include more consideration of the value of decentralized infrastructure. The rules require utilities consider co-benefits of different potential mitigation options, but they do not expressly require utilities prioritize specific technologies.

Pacific Power⁶

Pacific Power provided responsive comments to Rogue Climate, OSSIA, the Hood County Board of Commissioners, and the conclusions in the report from Staff's IE. Pacific Power expressed appreciation for the comments from stakeholders and believes, as does Staff, that many of these concerns will be resolved with ongoing community engagement.

Pacific Power expressed concern that the criteria used by the IE may not be consistent with the rules guiding the current Plans. Staff wants to make clear that the IE's recommendations and conclusions provided guidance to Staff. The individuals with Bureau Veritas conducting the evaluation have extensive experience evaluating plans in other states with varying requirements. Some of the IE's comments reflect that experience.

Conclusion

Staff considers WMPs as ongoing living documents or plans that are more a "journey" and less a "destination." Future plans will be shaped by new technology, greater understanding of risks, climate change, and energy policy. Minimum requirements will likely change, and expectations of providing more details used in risk analysis, cost-benefit analysis and new technologies will expand. This will be a continuing effort in

⁴ <https://edocs.puc.state.or.us/efdocs/HAC/um2207hac154140.pdf>.

⁵ <https://edocs.puc.state.or.us/efdocs/HAC/um2207hac868.pdf>.

⁶ <https://edocs.puc.state.or.us/efdocs/HAC/um2207hac115358.pdf>.

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partnership with Stakeholders to not only comply with minimum requirements, but also to improve practices that will facilitate electric safety and reliability for the utilities and the public they serve.

Pacific Power has developed WMPs for its territories in other states. California's requirements differ greatly from the rules governing this Plan and Staff would like to recognize the Company for shaping its Plan to our rules. Pacific Power's service territory is widely distributed across the state making it more of a challenge to engage with and meet the expectations of different communities. Staff recognizes the Company has made significant improvements over the past two years in its relationships with local jurisdictions and communities.

Staff's concluding summary of its evaluation of Pacific Power's 2022 WMP includes acknowledgement of Stakeholder engagement, a high-level overview of the recent wildfire mitigation planning efforts from August 2020 to present, and summarized recommendations from the analysis above that include certain actions and additional requirements for inclusion in the Company's 2023 WMP for Commission consideration.

Staff recommends approval of Pacific Power's 2022 WMP. Staff provides its observation on modifications to be included in Pacific Power's next WMP and includes them in Attachment A.

PROPOSED COMMISSION MOTION:

Approve Pacific Power's 2022 Wildfire Mitigation Plan and direct Pacific Power to incorporate Staff's recommendations in its 2023 Plan.

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Staff Recommendations for Pacific Power’s 2023 Plan:***OAR 860-300-0020 (1)(a)(A) & (B):***

1. Pacific Power include details of the analysis completed to identify the PSPS Zones, as well as the industry approach taken, and resources involved in the map decision-making. With the PSPS Zones designating where PSPS’s may take place, and where budget is being spent hardening infrastructure, it is important to clarify the measures taken to identify the PSPS Zones.
2. Pacific Power include details of the analysis completed to identify the riskiest specific asset features, such as conductor type. With distribution hardening projects in the PSPS Zones projected to take eight years, understand how projects are being prioritized based on varying asset risk levels.

OAR 860-300-0020 (1)(b):

3. Pacific Power include the analysis of comparing measured risk reduction of plan activities to their costs, a cost-benefit analysis.
4. Pacific Power include a description of how the overall effectiveness of the plan activities will be measured, as well as information on wildfires in the service territory for the prior year.

OAR 860-300-0020 (1)(c):

5. Pacific Power provide details of how the objectives of individual key preventative actions have been met or not met, from the prior year of system operation.
6. Pacific Power further demonstrate to what degree the preventable measure has reduced the risk of the utility’s infrastructure from the cause of fire.

OAR 860-300-0020 (1)(d):

7. Pacific Power include clarification about Community Resource Centers (CRC) in its 2023 WMP Update, to include:
 - Whether CRCs will be activated by the Company in every instance of a PSPS, and
 - How and when local emergency management will be notified about whether a CRC will be activated for critical preparation in meeting the needs of the impacted community.

8. Pacific Power provide clarification about Community Resource Centers (CRC) in its 2022 emergency training and exercise imminent events, to include:
 - Whether CRCs will be activated by the Company in every instance of a PSPS, and
 - How and when local emergency management will be notified about whether a CRC will be activated for critical preparation in meeting the needs of the impacted community.

OAR 860-300-0020 (1)(e):

9. Pacific Power include a more robust description for the re-energization stage of a PSPS in its 2023 WMP Update, to include:
 - Re-energization procedures, and
 - Timing, including factors that affect timing for power restoration actions.
10. Pacific Power include previous year's lessons learned regarding de-energization of power lines in its 2023 WMP Update, to include:
 - Findings from after action reports, including survey results, from exercises and actual events (when available).
11. Pacific Power include more information on where and when the modifications to its power system are being deployed.
12. Pacific Power include more information on what conditions trigger the modifications, who makes the decision to modify operations, and the analysis used to make such decision.

OAR 860-300-0020 (1)(f):

13. Pacific Power include enhanced description of the outreach efforts in its 2023 WMP Update, to include:
 - Examples of messaging;
 - Selection process for methods of outreach;
 - Determination of target audience;
 - Metric and criteria used to evaluate effectiveness of outreach;
 - Outcome of previous year's outreach evaluation;
 - Description of Company personnel and external resources responsible for outreach efforts; and
 - Description of timing of the outreach, including before, during, and after wildfire season.
14. Pacific Power include a discussion about community outreach and public awareness efforts as part of its 2022 emergency training and exercise imminent

events, to clarify these activities, and to solicit input from participating Stakeholders.

OAR 860-300-0020 (1)(g):

15. Pacific Power provide reasoning, or an explanation of the analysis used, for choosing the shortened inspection frequencies. For example, for overhead distribution and transmission less than 200 kV, the detailed inspection frequency is shortened from 10 to 5 years in FHCAs. No summary of the analysis is provided that supports the inspection frequency, such as the type and volume of fire threat conditions found in FHCAs historically or fire threat conditions in the FHCAs that have caused wildfires in the past. It is unclear what information drove the decisions of the FHCA inspection frequencies chosen. Supportive information demonstrating how historical efforts have confirmed the success of modified procedural or operational changes is lacking.

OAR 860-300-0020 (1)(h):

16. Pacific Power provide more information regarding their quality control/quality assurance program and audits for vegetation management work completed in the FHCAs; measures employed, frequency, and resource types.

17. Pacific Power provide any analysis of historical events pertaining to Pacific Power's power lines, specific equipment type, vegetation, and wildfires.

OAR 860-300-0020 (1)(i):

18. Pacific Power include a summary of the quantitative analysis used in the choice and prioritization of specific solutions and investments.

19. Pacific Power discuss the impact of participation in expert forums on identification of solutions most like to provide the benefits anticipated. This should include:

- Cited research, reports, and studies used in any analysis, unless the source is confidential.
- How the factors unique to the Company's facilities and service territory were used when considering the applicability of specific options to its systems.

OAR 860-300-0020 (1)(j):

20. Pacific Power include more specifics on what it has learned by participating in these groups. Staff would like assurance the Company is leveraging the learnings from other utilities to facilitate implementation of solutions with the highest benefit cost ratio.