

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UM 2209

In the Matter of

IDAHO POWER COMPANY,

2024 Wildfire Mitigation Plan.

ORDER

DISPOSITION: STAFF'S RECOMMENDATION ADOPTED

At its public meeting on July 9, 2024, the Public Utility Commission of Oregon adopted Staff's recommendation in this matter.¹ The Staff Report with the recommendation is attached as Appendix A.

BY THE COMMISSION:



Alison Lackey

Chief Administrative Law Judge



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.

¹ Under ORS 757.963 the Commission has 180 days after the filing of a wildfire mitigation plan to evaluate and approve it, or approve it with conditions. The original schedule for this docket contemplated a Commission decision at the June 25, 2024 regular public meeting, within the 180-day timeframe. In order to provide additional opportunity for participant input ahead of Staff's final recommendation, the Commission's decision was rescheduled to the next regular public meeting, on July 9, 2024, in substantial compliance with ORS 757.963. See ORS 756.062.

**PUBLIC UTILITY COMMISSION OF OREGON
STAFF REPORT
PUBLIC MEETING DATE: July 9, 2024**

REGULAR X **CONSENT** **EFFECTIVE DATE** **Upon Commission Approval**

DATE: July 5, 2024

TO: Public Utility Commission

FROM: Heide Caswell

THROUGH: Bryan Conway **SIGNED**

SUBJECT: IDAHO POWER COMPANY:
(Docket No. UM 2209)
2024 Wildfire Mitigation Plan – Request for Commission Approval.

STAFF RECOMMENDATION:

Approve Idaho Power’s 2024 Wildfire Mitigation Plan. In addition, direct Idaho Power to take the following actions advancing future Wildfire Mitigation Plans:

1. Implement Staff’s identified recommendations into its 2025 WMP;
2. Provide input to Staff on proposed standard data templates to be included in WMP guidelines (2025 WMP);
3. Participate in a Staff-led process establishing proposed guidelines which clarify expectations and standards for risk quantification and risk-spend efficiency (2026 WMP); and
4. Work jointly to propose a standardized WMP format and set of definitions and submit to Staff for inclusion in WMP guidelines (2026 WMP).

DISCUSSION:

Issue

Whether the Oregon Public Utility Commission (Commission) should approve Idaho Power’s (IPC or Company) 2024 Wildfire Mitigation Plan. Whether the Commission should direct Idaho Power to take the actions recommended by Commission Staff.

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Applicable Rule or Law

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.

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.

Senate Bill (SB) 762 (2021), incorporated as ORS 757.960 through 757.969, established standards for electric utility's Wildfire Mitigation Plans and required the Commission to promulgate rules related to the requirements of the Plans. Pursuant to ORS 757.963 the Commission may "approve with conditions" a public utility's Wildfire Mitigation Plan or update.

Division 300 of the OARs articulates the minimum requirements for the Plan filings as well as the process for Commission approval.

The Commission approved the Idaho Power 2023 WMP in Order No. 23-222 and directed that the Company consult with Staff as to implementation of the recommendations and to detail in its Plan next year, the specific results of that engagement on each recommendation, and the ultimate outcome.

Analysis

This memo provides brief policy context prior to Public Utility Commission Staff's (Staff) review of the Wildfire Mitigation Plan (WMP or Plan) and proposes collaborative next steps for advancement of wildfire planning.

The memo integrates insights provided by the Climate Wildfire and Energy Strategies (CWE Strategies), the Independent Evaluator (IE), and the Company and concludes with Staff's recommendation to approve IPC's 2024 WMP. Throughout, Staff provides recommendations and identifies additional information which should be included in IPC's 2025 WMP, shown in Attachment A. Staff also identifies opportunities for advancement of the WMPs with an eye towards effectuating meaningful, robust, and transparent wildfire plans and processes.

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Staff wishes to recognize the enormous amount of work that goes into producing a WMP. IPC's 2024 WMP provides a new level of insight into the Company's wildfire planning practices. Readers gain increased understanding of the processes used to identify risk and select mitigations. Oregon's Investor-Owned Electric Utilities (IOUs or the Utilities) have been lauded for their efforts in WMP development and Plan maturity.¹ Staff appreciates the Utilities' collaborative approach to an evolving process and willingness to have open conversations about their Plans as well as a shared commitment to addressing the significant risk wildfires pose to utility infrastructure and public safety.

Background

On December 29, 2023, Idaho Power filed its WMP for the 2024 fire season with the Commission. IPC's 2024 WMP represents the third year of wildfire planning pursuant to Oregon's statutory requirement. However, it should be noted that IPC has been developing wildfire mitigation plans since 2019.² WMPs are reviewed for compliance with the requirements of Division 300. Staff and the Commission have recognized that Minimum requirements will likely change and expectations of providing more details used in risk analysis, cost-benefit analysis, and new technologies will expand. WMPs are viewed not as static but rather an arena for improved practices that will facilitate electric safety and reliability for the utilities and the public they serve.³

WMP Policy Context

Throughout its assessment of the WMP, Staff provides recommendations for advancement of the WMP process. This push for the evolution of WMPs is spurred by two main drivers: a deeper understanding of scale of the risk and cost implicated in wildfire planning and a strong desire to align WMPs with the goals and requirements of the statute.

Beyond the risk wildfires pose to life and property, they also create significant risk to the financial health of IOUs. Even large and well-established utilities, such as Pacific Gas & Electric in California,⁴ may find themselves one ignition away from bankruptcy. Similarly,

¹ *Wildfire: Assessing and Quantifying Risk Exposure and Mitigation Across Western Utilities*, Stanford Climate & Energy Policy Program, May 2024, <https://woods.stanford.edu/news/wildfire-assessing-and-quantifying-risk-exposure-and-mitigation-across-western-utilities>.

² Wildfire Mitigation, Oregon Public Utility Commission Website, <https://www.oregon.gov/puc/safety/pages/wildfire-mitigation.aspx>.

³ Order No. 22-131, *In the Matter of PacificPower 2022 Wildfire Protection Plan*, Docket No. UM 2207, April 28, 2022; Order No. 22-132, *In the Matter of Portland General Electric 2022 Wildfire Protection Plan*, Docket No. UM 2208, April 28, 2022; Order No. 22-133, *In the Matter of Idaho Power 2022 Wildfire Protection Plan*, Docket No. UM 2209, April 28, 2022.

⁴ PG&E Bankruptcy, California Public Utility Commission, <https://www.cpuc.ca.gov/industries-and-topics/pge/pge-bankruptcy>.

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significant utility risk can impact the ability of an IOU to obtain insurance and access credit.⁵ While on first glance, these appear to be risk specific to an individual utility, ratepayers often directly or indirectly bear these costs.

Since approval of the 2023 WMPs, Pacific Power has filed to defer costs associated with civil liability.⁶ While the total amount of these costs remains unknown, due to ongoing litigation and appeals processes, Berkshire Hathaway's Securities and Exchange Commission (SEC) report estimates cumulative probable Wildfire losses at \$2.4 billion through December 31, 2023.⁷ Similarly, electric utilities are seeking to include increased insurance costs in rates.⁸ Ratepayers also fund wildfire risk reduction efforts. Proposed WMP expenditure forecasts have risen from around half a billion dollars in the first WMP to more than 1.75 billion in the 2024 WMPs.⁹ Staff raises these examples to bolster the need for robust review of WMPs, in light of significant financial impacts. Moreover, Staff believes a robust review of WMP is vital to meeting the goals and requirements of the statute.

ORS 757.963 requires a public electric utility to: "have and operate in compliance with a risk-based wildfire protection plan [...] that seeks to protect public safety, reduce risk to utility customers and promote electrical system resilience to wildfire damage."¹⁰ WMPs must, at minimum, "[i]dentify a means for mitigating wildfire risk that reflects a reasonable balancing of mitigation costs with the resulting reduction of wildfire risk."¹¹

Staff recognizes the protection of public safety, reduction of risk to utility customers, and promotion of electrical system resilience as goals of the legislation rather than specific required outcomes. Staff believes to meaningfully promote these goals, WMPs must demonstrate how planned efforts will be effective at achieving stated results. Similarly,

⁵ *Moody's Downgrades Hawaiian Electric's Credit to Junk Amid Maui Wildfire Scrutiny*, Reuters, August 18, 2023, <https://www.reuters.com/article/business/energy/moody-s-downgrades-hawaiian-electric-s-credit-to-junk-amid-maui-wildfire-scrutin-idUSNIKBN2ZT0J3/>.

⁶ Docket No. UM 2292, *PacifiCorp Application for Authorization to Defer Costs Related to Wildfire Liability*, June 16, 2023, noting that "deferral does not equal cost recovery but allows the utility to "preserve its ability to seek [cost] recovery in the future.

⁷ Berkshire Hathaway, *Annual Report Pursuant to Section 13 Or 15(D) of the Securities Exchange Act of 1934*, Note 27 to Consolidated Financial Statements-Contingencies and Comments, p.K-116, noting that estimates are before expected insurance recoveries, Feb. 26, 2024, <https://www.sec.gov/ix?doc=/Archives/edgar/data/0001067983/000095017024019719/brka-20231231.htm>.

⁸ Docket No. UM 2301, *PacifiCorp Application for Authorization of Deferred Accounting Related to Insurance Costs*, Aug. 21, 2023.

⁹ Due to inconsistent plan years and estimates these are roughly extrapolated when no information was provided.

¹⁰ ORS 757.963(1).

¹¹ ORS 757.963(2)(b).

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Staff views the statutory requirement to balance mitigation costs with risk reduction as requiring 1) an understanding of system risk prior to any mitigation (foundational risk), 2) the ability to quantify the amount of risk reduction achieved by specific mitigation measures, and 3) demonstration that the mitigation measure selected is appropriately tailored to the risk being addressed (that another mitigation would not address the risk more cost effectively).

The Commission has repeatedly supported Staff's view of the WMP requirements, directing the Utilities to collaborate on risk valuation methodology with a long-term goal of a unified, consistent method for valuing risk versus mitigation costs.¹² While each IOU has made progress towards a cost-benefit analysis, the 2024 WMPs fall short of providing sufficient information to permit data-driven decisions to be made in the cost recovery process.¹³

Next Steps to Advance WMPs

The rate of progress is insufficient given the level of risk and magnitude of costs addressed in the Plans. Consequently, Staff believes a Commission-directed process is required to ensure future WMPs realize Commission directives and facilitate a meaningful, transparent, and robust WMP process.

Staff is cognizant that pressures of the WMP review timeline, ambiguity in WMP requirements, and volume of data requests (DRs) provide similar challenges for the IOUs. The lack of shared processes, standards for data presentation, or consistent terminology across utilities further complicates Staff's review and poses significant hurdles to understanding wildfire mitigation efforts at a state-wide level. Thus, in addition to specific recommendations for Idaho Power, Staff offers joint recommendations which serve as a guide for advancing the WMPs and begins the process of calibrating the Utilities' risk modeling methods and creating shared expectations.

Explained in more detail in the proposed work plan for the Joint Recommendations, Attachment B, the joint recommendations focus on three main undertakings: the transition to a multi-year WMP plan, the standardization of certain WMP elements, and implementation of Staff-led WMP work group. Staff solicited input from the IOUs regarding the joint recommendations and Pacific Power, Portland General Electric, and Idaho Power all provided input as discussed in detail in the proposed work plan.

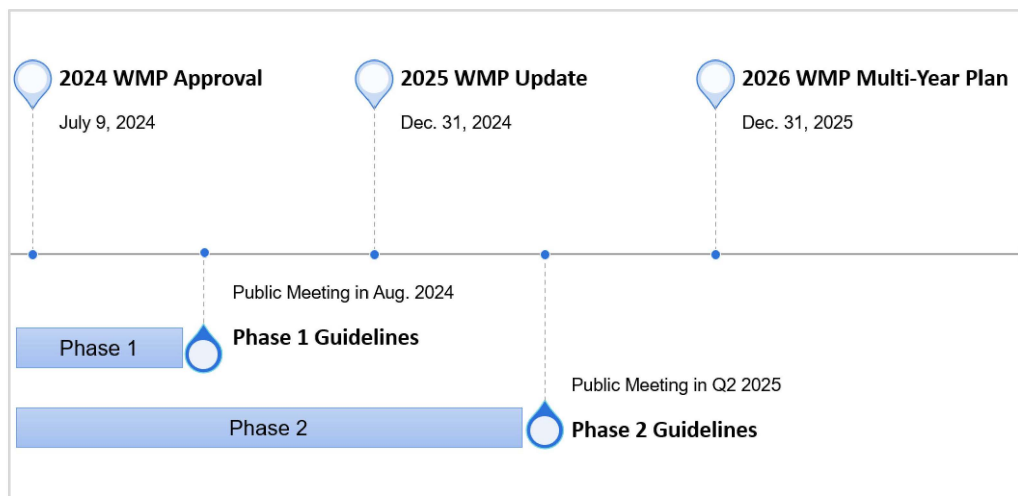
¹² Order No. 23-222, *In the Matter of Idaho Power 2023 Wildfire Protection Plan*, Docket No. UM 2209, June 26, 2023.

¹³ Docket No. UM 2209, 2024 Independent Evaluator's Report, June 12, 2024 (*hereinafter* IE Report); Order No. 23-222, *In the Matter of Idaho Power 2023 Wildfire Protection Plan*, Docket No. UM 2209, Recommendations, p.21, June 26, 2023.

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Concerns expressed by all three of the Utilities surrounded the time frame for implementation of the Joint Recommendations and the Companies' use of limited resources during the fire season. Ultimately, IOU input persuaded Staff that it was infeasible to implement the recommended standardization elements or risk valuation framework in the 2025 WMPs. Consequently, Staff is proposing a two-year phased approach to implementing the Joint Recommendations, illustrated in Figure 1 below.

Figure 1: Implementation Timeline



Transition to a multi-year Plan is necessary to address the challenges posed by the current structure of the WMP review process and the lack of data necessary to perform robust review of mitigation proposals. Staff believes another year of business-as-usual WMPs represents an inefficient use of time and resources, and consequently recommends use of a WMP Update for the 2025 fire season¹⁴ as the appropriate procedural mechanism for enabling the Company to update its WMPs as needed, initiating the transition to standardized elements, and freeing up resources to permit IOU participation in the working group.¹⁵

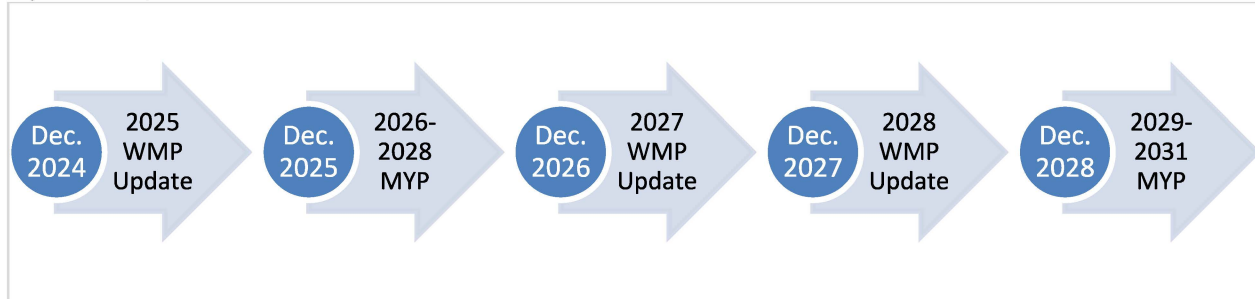
A WMP Update would also permit the transition to a multi-year planning cycle beginning with the 2026 WMP, as shown in Figure 2. A multi-year WMP addresses the considerable time constraints associated with the Commission approving new efforts, programs, or mitigation measures only weeks before, or even after, the start of fire season.

¹⁴ Submitted in December 2024.

¹⁵ See Attachment B, Updated Process and Planning Cycle, p.3.

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Figure 2: Implementation of Multi-Year Plans for WMPs



WMP standardization consists of creating a consistent structure and terminology for the WMPs, which will make it easier to locate information within the Plans and make comparison of efforts across utilities clearer for public safety partners and other stakeholders. To that end, Staff recommends standardization of WMP reporting structure, definitions, and presentation of critical data through standard data templates. The current diversity in terminology and use of the same term to mean different things across utilities requires a level of nuanced analysis of each utility's WMP which limits their usefulness to stakeholders. Shared terminology or definitions are necessary to facilitate meaningful conversations surrounding risk in Oregon. Use of standard templates likewise ensures clear expectations of what data is required and enables an apples-to-apples comparison of mitigation efforts. Staff intends that the data templates would replace many, if not all, of the standard data requests streamlining process and workload. Similarly, use of a common structure and terminology for the WMPs will significantly reduce the number of follow up questions required to understand the approach each of the Utilities took in formulation of their WMPs.

Staff's recommendation for creating a Staff-led working group is aimed at maturing the WMPs and providing clear guidelines. Building on Staff recommendations of prior years, a risk quantification and risk-spend efficiency are the recommended focus areas for the working group. A thorough understanding of service territory and asset risk is foundational to the goal of calibrating the utilities risk modeling methods. A Working Group focus on risk quantification and risk-spend efficiency be time limited and conclude its work with proposed guidelines for risk scoring, utility asset registries, risk model inputs, risk quantification methodology, and risk-spend efficiency methodology for Commission consideration as part of Phase 2 of implementing the Joint Recommendations.

Despite the sizable effort required to implement these changes, Staff intends that such an effort will reduce the workload for WMP review, increasing Staff bandwidth. Staff believes its Joint Recommendations are both achievable and necessary to propel

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Oregon's wildfire planning forward at a speed that accounts for the magnitude of the risk.

Staff recommends using a process similar to those used in Distribution System Plans,¹⁶ the Purchase Gas Adjustment Mechanisms,¹⁷ and Integrated Resource Plans,¹⁸ where a joint working group provides draft guidelines for Commission adoption.

Staff Review of 2024 WMP

Staff's analysis, detailed below, considers the Company's compliance with the WMP minimum requirements set forth in Division 300. The comments and recommended actions, reflect Staff's review of the Company's WMP, review of the IE's Report, review of Stakeholder Comments, ongoing participation in WMP 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 Company's community outreach efforts.

The IE, CWE Strategies, was selected 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). The IE adopted the compliance metrics used by Bureau Veritas North America, in previous years 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 did not meet the requirements. The IE also provided insight into additional insight into the WMPs noting where the WMPs and DR responses did or did not provide information for a determination of Plan effectiveness. While considerations of effectiveness did not inform Staff's evaluation of compliance, Staff appreciates the work of the IE in illuminating areas for continued improvement and growth.

Process

Immediately after the approval of the 2023 WMPs, Staff began coordinating with the IOUs on expectations for the 2024 Plans, involving 4 workshops for coordination on Staff's 2023 recommendations.

¹⁶ Order No. 19-104, *In the Matter of Investigation into Distribution System Planning*, Docket No. UM 2005, March 22, 2019.

¹⁷ Docket No. UM 1286, Staff Memo Requesting to open an investigation into the Purchase Gas Adjustment (PGA) Mechanism, Nov. 21, 2006.

¹⁸ Order No. 02-546, *In the Matter of the Investigation into Least Cost Planning Requirements*, Docket No. UM 1056, Aug. 8, 2002.

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Starting in November 2023, Staff engaged the utilities on the WMP process for the 2024 fire season, providing them opportunities to weigh in on the process and Staff's standard data requests.

At the IOUs' behest, the standard data requests were broken up into two sets and provided to the utilities. After requesting multiple extensions, the IOUs provided the bulk of the responses in March 2024, which left Staff with 90 days to complete the bulk of its analysis. Follow-up data requests were also required for all utilities. Where needed, Staff also hosted deep dives on focused subject areas, to gain necessary details regarding the WMPs. The final deep dive occurred on May 29, 2024, leaving Staff with less than 30 days to complete its analysis. Staff believes the process exemplifies the need for clear WMP guidelines, so that Staff has sufficient time and information at the beginning of the process to permit it to perform the analysis crucial for ensuring robust and meaningful WMPs.

The WMPs, the IE Draft Report, IE Final Report, and Staff draft memo were posted to the UM 2209 docket for stakeholder input.

Staff provided drafts of its joint recommendations to the IOUs for their input and hosted workshops on June 17 and June 26, 2024, to discuss. Input from the Utilities informed revisions to Joint Recommendations, as discussed in Attachment B.

Summary of Incorporation of 2024 Plan Recommendations

In evaluating the 2024 Plan's evolution, Staff reviewed the utility's integration of the recommendations made during the 2023 Plan review.

Staff believes that the bulk of effort needed to ensure meaningful, robust, and transparent WMPs going forward centers on ensuring a shared understanding of expectations as Plans continue to mature. To that end, Staff hopes that jointly developed guidelines, definitions, and templates will ensure that Staff's and the Company's expectations are aligned.

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 Idaho Power's WMP efforts for Commission consideration.

Staff received comments in UM 2209 from IPC and Oregon Citizens' Utility Board (CUB). The Company's first set of comments focus on the IE report, providing additional

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information and clarifications on its WMP.¹⁹ Staff acknowledges the desire of all three IOUs to have further discussions about the role of the IE Report in the WMP process and looks forward to leading those efforts.

Idaho Power provided additional comments July 1, 2024, on the Final IE Report and Staff's draft memo for UM 2209.²⁰ In the Company's comments it expresses overall support for Staff's Joint Recommendations.

CUB's comments include both appreciation for the contents of Staff's recommendations but pushes for Commission adoption of alternative recommendations which, among other things, would direct the IOUs to complete all the IE's Cross-Utility Recommendations for filling in their 2025 WMPs. Staff appreciates support for its general direction of the WMPs, however, recognizes that certain foundational elements are not yet in place in Oregon. Specifically, risk quantification, estimation, and valuation were produced in a separate proceeding in California and accessible for determining risk reduction values, while in Oregon no such process has yet taken place.

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 Public Utility, and

(B) Outside the service territory of the Public Utility but within the Public Utility's right-of-way for generation and transmission assets.

Staff Analysis:

Idaho Power met the requirements for identifying its high fire risk zone, and Staff appreciates the obvious maturing which has occurred between the 2024 and 2023 Plans in regard to fire risk identification. However, Staff finds at least two areas which it would appreciate greater explanation in the Plan. First, how did the Company determine the buffering distance that it applied (240 meters), and second, what metric or other parameter helped to define a Yellow Risk Zone from a Red Risk Zone?

The IE provides its recommendations on ORS 860-0300-0020(1)(a)(A) & (B) in Section 3.1 of the IE report.²¹ Staff agrees with the IE's recommendations regarding explanation of their buffer distance, how Yellow Risk Zones (YRZs) versus Red Risk

¹⁹ Docket No. UM 2209, Idaho Power's Comments on IE Report, May 31, 2024.

²⁰ Docket No. UM 2209, Idaho Power's Final Comments, July 1, 2024.

²¹ IE Report, p 8.

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Zones (RRZs) are established, and the impact of either underground assets or recent fuel changes on their risk designation.

Staff expects that upon completion of Joint Recommendations K and L, the buffer and risk zone differentiations will be able to be more clearly detailed.

Staff Recommendations for Idaho Power:

- 1) Explain the rationale for the 240 meter buffer around assets.
- 2) Provide explanation of the method Idaho Power used to differentiate Yellow Risk Zones (YRZs) from Red Risk Zones (RRZs) (particularly with the recent modification of the area around Halfway, which transitioned to a Red Risk Zone).

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:

Idaho Power's WMP provides a detailed review of historical wildfires and discusses generally the extreme costs that can result. It has demonstrated an understanding and plan to continue to develop its Risk Spend Efficiency (RSE). Idaho Power highlights its Oregon high fire risk areas (HFRZ) and the various cost-effective mitigation measures they plan to pursue; the Company identifies multiple viable mitigation approaches and describes how risk drivers and costs may implicate certain measures over others. Staff appreciates how Idaho Power has discussed trade-offs in the Plan, and the Company's acknowledgement of the need to balance risk reduction approaches versus costs to achieve the reduced risk state.

Idaho Power does not appear to have yet developed a detailed distribution circuit-specific ranking (or circuit segment ranking) and indicates it is still working toward the production of a risk valuation methodology, such as an RSE.

Staff agrees with the IE's recommendations on OAR 860-300-0020 (1)(b),²² that IPC's Plan would benefit from clarity on how it performed risk modeling, the various attributes (and weightings) considered when modeling risk, risk drivers apply to specific utility assets, and the resulting risk quantification. Further, after a mitigation measure is complete, the resulting risk values should be communicated.

Staff anticipates that upon completion of Joint Recommendation K, the model inputs, weightings, and asset history and its role in asset prioritization will be able to be

²² IE Report, p 9.

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detailed. With the completion of Joint Recommendation L, a prioritization of circuit, circuit segments, zone of protection or assets will emerge allowing for clarity as to the highest ranked risks compared to those of lower priority. As the IOUs and Staff continue to evolve the WMP maturation in Joint Recommendation M, further quantification regarding risk buy-down will become possible.

Staff Recommendations for Idaho Power:

- 3) Provide detailed model inputs, weightings, and methodology for designating locational risk and the manner in which asset history or equipment trends impact the designation of utility risks.
- 4) Explain how risk mitigation results in changes in utility risk.

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:

Staff appreciates the advances Idaho Power has made in its 2024 WMP, particularly in the areas of program development and outlining the assets in each jurisdiction. It provided a number of tables to outline assets, costs, and programs for the multiyear period, some of which were identified distinctly in Oregon. Further, the Company details improvements to system hardening throughout the WMP, as well as its co-benefits to mitigate fire and increase service reliability. This is particularly well demonstrated in Table 8 of IPC's 2024 WMP.²³ Idaho Power met the requirement of this rule by providing a description of costs as well as tables that show the forecast budgets over a five-year period by mitigation tactic.

Staff agrees with the IE's recommendations for OAR 860-300-0020 (1)(i) that IPC's Plan would benefit from greater discussion about the mitigations chosen and the expected risk reduction, notably preparation of a cumulative risk curve and the buy-down amount for the various proposed measures. Developing a standard structure (perhaps building upon Pacific Power's Table 5 of 20 highest risk circuits) with further zone of protection level details would also be helpful to explain actions being taken. Further, clarity about the use of grants and their impacts to wildfire mitigation cost estimates would be beneficial for stakeholders.²⁴ Staff recommendations for this section are contained in discussion of OAR 860-300-0020 (1)(b) above.

²³ Docket No UM 2209, 2024 Wildfire Mitigation Plan, p. X, Table 8 Dec. 29, 2023.

²⁴ IE Report, p.13.

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Again, Staff expects that upon completion of Joint Recommendations K and L, the model inputs, weightings and asset history and its role in asset prioritization will be able to be detailed. Joint Recommendation M, addresses need for additional mitigation information, facilitating quantification of risk buy-down in future WMPs.

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:

Idaho Power has met this requirement, outlining numerous mitigation measures, providing detailed description of the mitigation and risk reduction benefit. The next WMP should include location details for mitigation measures and provide details of the risk-benefit analysis.

Staff agrees with the IE's recommendations for OAR 860-300-0020 (1)(c), that Idaho Power should provide greater insight into ranking of asset risk, balancing of vegetation management versus other mitigation strategies, and the advancement of covered conductor as a routine hardening choice, upon completion of its pilot.

Staff anticipates that asset level priorities will be informed by the work proposed in Joint Recommendations K and L, with program level information in Joint Recommendation F, and that mitigation selection and the resulting risk will benefit from the WMP maturation in Joint Recommendation M, while the pilot development explanation will be guided by Joint Recommendation J.

Staff Recommendations for Idaho Power:

- 5) Continue evolution of Tables 7 and 9, detailing state-level annual estimates and units for each mitigation tactic, with the resulting estimated risk reduction.

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:

Idaho Power met the requirements of the regulation for outreach regarding tabletops and outreach; it modified its outreach schedule to better align with partner availability and usefulness of the outreach based on feedback provided by public safety partners.

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Staff agrees with the IE's recommendations for OAR 860-300-0020 (1)(d) that more discussion about Idaho Power's emergency response structure would be beneficial, particularly if it adopts National Incident Management System (NIMS) or Incident Command System (ICS). Additionally, IPC should describe how it maintains its contacts with public safety partners, and the cadence for public safety partner interaction based upon the reason that precipitated the interaction. Finally, continuing to share how feedback is incorporated (building upon Section 10.2 content) will improve the Plans as they continue to mature.²⁵

Staff anticipates that work proposed in Joint Recommendations O and Q and the resulting best practice methods will afford Idaho Power the opportunity to discuss this aspect in their Plan more fully in the future. Further discussion regarding the implementation of a partner portal should be addressed as part of Joint Recommendation O.²⁶

Staff Recommendations for Idaho Power:

- 6) Include details about command structure used during emergency activation, whether National Incident Management System (NIMS), Incident Command System (ICS), or other standards.
- 7) Identify general frequency and types of interactions with public safety partners.
- 8) Continue to outline how the Plan evolves based on feedback provided by public safety partners and others.

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:

Idaho Power's communications protocols met the requirements for Public Safety Power Shutoffs (PSPS) communications in alignment with the regulations. Idaho Power also discussed how it uses its Empower program to help identify customers who may have life-sustaining equipment reliant on electricity and how they are leveraging that program as part of planning for PSPS, however the discussion is targeted toward Idaho and

²⁵ IE Report, p.14.

²⁶ OAR 860-300-0060(1). The Public Utility will create a web-based interface that includes real-time, dynamic information on location, de-energization duration estimates, and re-energization estimates. The web-based interface will be hosted on the Public Utility's website and must be accessible during a PSPS event. The Public Utility will complete the web-based interface before March 31, 2024.

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would benefit from discussion about how the Company completes equivalent work in Oregon.

Staff agrees with the IE's recommendations for OAR 860-300-0020 (1)(e) that greater clarity around leveraging relationships with community-based organizations (CBOs) to inform communities about PSPS methods used by the Company. This could include a listing of CBOs who partner with IPC in information sharing processes, well as venues the Company has used to coordinate with partners and what the outcomes from those efforts were.²⁷ Additionally, to the extent that customers would benefit from battery rebates, more insight into how communication about the program and the audiences with whom it is being communicated, as well as the effectiveness of the outreach would be helpful.

Staff anticipates that work proposed in Joint Recommendations O and Q and the resulting best practice methods will provide valuable learning and Idaho Power is encouraged to continue to discuss these advancements in future WMPs.

Staff Recommendations for Idaho Power:

- 9) Identify Community Based Organizations who are participating in community outreach supportive of Public Safety Power Shutoffs and what specific actions they are taking.
- 10) Discuss how Empower is used in Idaho Power's Oregon service territory.
- 11) As appropriate, identify how customers are able to use battery rebate or other programs to improve resilience to events such as Public Safety Power Shutoffs.

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:

Idaho Power utilizes a wide range of communication methods to meet the requirements for community outreach and public awareness before, during, and after fire season. Idaho Power should evaluate whether translation options should expand beyond English and Spanish speaking communities.

Staff agrees with the IE's recommendations for OAR 860-300-0020 (1)(f) that further analysis of methods of customer outreach and awareness of the effectiveness of that

²⁷ IE Report, p 15.

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outreach is an important evolution in the maturing of WMP processes and plans.²⁸ Idaho Power, similarly to the other IOUs, has communicated in its Plan that PSPS could occur anywhere, not just in designated fire risk areas. As a result, it is important to understand whether community messaging is reaching areas not currently identified as wildfire risk areas.

Staff anticipates that work proposed in Joint Recommendations O and Q and the resulting best practice methods will provide valuable learning and Idaho Power is encouraged to continue to discuss these advancements in future WMPs.

Staff Recommendations for Idaho Power:

- 12) Ensure community outreach regarding Public Safety Power Shutoffs includes other safety topics appropriate for the community, leveraging relationships with public safety partners.
- 13) Develop methods for determining the effectiveness of community outreach to improve awareness of and resilience to wildfire and other risks appropriate for the community.

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:

Idaho Power met the requirements for inspection and correction, based on meeting administrative rules requiring asset inspection. Staff appreciates the richer discussion in the Plan relating to its inspection and correction program which was responsive to 2023 Staff recommendations. It outlines its inspection & correction process and given the limited HFRZ it has in Oregon, has limited additional activities (which seem to focus on thermography). It is noteworthy that about 60 percent of its HFRZ transmission thermography costs (over the 5-year period) are in Oregon, while about 5 percent of HFRZ distribution thermography costs (over the 5-year period) are in Oregon.

Staff agrees with the IE's recommendations for OAR 860-300-0020 (1)(g) that greater discussion around inspection cadence and timing for assets that are within fire risk areas should be part of the Plan. The Company's inspection activities should be founded upon analysis demonstrating optimal inspection cadence, which incorporates ignition history and ignition risk drivers.²⁹

²⁸ IE Report, p 16.

²⁹ IE Report, p. 17.

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Staff anticipates that work proposed in Joint Recommendation M will assist in establishing the risk buydown associated with inspection and correction activities, while Joint Recommendation G will drive toward consistency in reporting on those activities in future WMPs. Joint Recommendations J and M, relating to piloted technologies, will similarly benefit inspection and correction work and inform asset ignition risk. Idaho Power is encouraged to continue to discuss these advancements in future WMPs.

Staff Recommendations for Idaho Power:

- 14) Discuss timing of inspection and correction frequency inside and outside high fire risk areas.
- 15) Discuss and demonstrate the use of ignition risk driver analysis and ignition historic analysis to determine optimal timing and completion of inspection and correction activities.

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:

Idaho Power met the requirements for vegetation management by relying on meeting administrative rules regarding the required clearances. The 2024 Plan provided deeper discussion of IPC's vegetation management program, including timing and goals, both inside and outside fire risk areas, responsive to 2023 Staff recommendations. Idaho Power indicated it analyzed its records and other data sources to determine that enhanced vegetation management is one of the most useful programs to achieve fire risk reduction and provided metrics used to inform that decision.

Staff agrees with the IE's recommendations for OAR 860-300-0020 (1)(h) that greater discussion is necessary about the reasoning behind the Company's expanded clearances, use of radial pole clearing, and vegetation patrol frequency have been selected.³⁰ While detailed data (with high confidence) may not yet exist, anecdotal evidence of the value delivered to a more durable electrical system would help bolster confidence in the Plan.

Staff anticipates that work proposed in Joint Recommendation M will assist in establishing the risk buydown associated with vegetation management efforts, while Joint Recommendation E will drive toward consistency in reporting on vegetation management activities in future WMPs. Joint Recommendations I and J, relating to piloted technologies will similarly benefit vegetation management work and inform asset

³⁰ IE Report, p. 19.

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risk related to vegetation contacts. Idaho Power is encouraged to continue to discuss these advancements in future WMPs.

Staff Recommendations for Idaho Power:

- 16) Discuss evolution of vegetation management program based on long term metrics developed in the Plan; where possible, continue to explore the relationship between fire history, outage history, and other indicators of optimization of the vegetation management program elements and provide information about learnings within the WMP.

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:

Idaho Power met the requirement by participating in a range of forums, as well as discussing the role new technology is playing in reducing wildfire risk. Further discussion surrounding the benefits of this participation and its impact in the evolution of the WMP would be useful. The Plan would benefit from additional information related to the advancement of new technologies Idaho Power is piloting.

Staff agrees with the IE's recommendations for OAR 860-300-0020 (1)(j) that more explanation of the types of piloting, their states of deployment, and costs would be beneficial.³¹

Staff anticipates that work proposed in Joint Recommendation M will assist in establishing the risk buydown associated with new technologies. Joint Recommendation I will drive toward consistency in reporting on those activities in future WMPs, as will Joint Recommendation J, relating to any technologies that are piloted by Idaho Power or other IOUs. Idaho Power is encouraged to continue to discuss these advancements in future WMPs.

³¹ IE report, p. 20.

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Staff Recommendations for Idaho Power:

- 17) Continue to engage in advancing its technology maturity and provide further details on the advances made (and their benefits) to reduced wildfire risk in future WMPs.
- 18) Report on results of joint utility maturity model pilot work and continue advancing wildfire maturity rubric in alignment with International Wildfire Risk Mitigation Consortium (IWRMC).

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

Description of ignition inspection programs, as described in Division 24 of these rules, including how the utility will determine, and instruct its inspectors to determine conditions that could pose an ignition risk on its own equipment and pole attachments.

Idaho Power met the requirements for ignition inspection generally based on meeting administrative rules requiring asset inspection. Idaho Power has yet to develop an ignition tracking database as noted in its 2024 WMP, however the Company appears to fulfill the requirements of FM221 reporting. Further, IPC describes the process regarding ignition risk analysis from outage history.

Staff agrees with the IE's recommendations for OAR 860-300-0020 (1)(k) regarding the importance of using asset history, outages, investigations, and other data to improve the ignition inspection program.³²

Staff anticipates that work proposed in Joint Recommendation M will assist in establishing the risk buydown associated with inspection activities. Joint Recommendations G and I will drive toward consistency in reporting on those activities in future WMPs, as will Joint Recommendation J, relating to any technologies that are piloted by Idaho Power or other IOUs that benefit inspection and correction work and inform asset ignition risk. Idaho Power is encouraged to continue to discuss these advancements in future WMPs.

Staff Recommendations for Idaho Power:

- 19) Provide history and other indicators of optimization of the vegetation management program elements and provide information about learnings within the WMP.
- 20) Continue to align IPC's ignition inspection and root cause analysis processes with other Oregon utilities as well as other peers.

³² IE report p. 21-22.

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Conclusion

Staff recommends approval of Idaho Power's 2024 WMP. Staff provides its observation on modifications to be included in Idaho Power's 2025 WMP and identifies them in Attachment A.

As demonstrated each year during fire season, wildfire risks are substantial and widely impactful. A meaningful, transparent, and robust WMP process is necessary to address these risks and associated costs. Staff appreciates the significant undertakings by the Company in developing its Plan and implementing a host of mitigation measures. However, without thorough and consistent information provided in the wildfire mitigation plans, Staff is unable to assess whether the measures the utility is taking address the risk and/or are economically justifiable. Staff believes that the Joint Recommendations will facilitate detailed exploration of risk and clear demonstration of the logic supporting mitigation selection decisions in future WMPs, and support the shared growth among the Utilities, stakeholders, and regulators.

While Staff recommends the Commission accept IPC's 2024 WMP, Staff's review makes no judgement on reasonableness. Commission acceptance of the Plan does not constitute a determination on the prudence of any individual actions discussed in the Plan. Staff understands that those individual actions, including project specific data, will be reviewed through the cost recovery process.

PROPOSED COMMISSION MOTION:

Approve Idaho Power's 2024 Wildfire Mitigation Plan. In addition, direct Idaho Power to take the following actions advancing future Wildfire Mitigation Plans:

1. Implement Staff's identified recommendations into its 2025 WMP;
2. Provide input to Staff on proposed standard data templates to be included in WMP guidelines (2025 WMP);
3. Participate in a Staff-led process establishing proposed guidelines which clarify expectations and standards for risk quantification and risk-spend efficiency (2026 WMP) and;
4. Work jointly to propose a standardized WMP format and set of definitions and submit to Staff for inclusion in WMP guidelines (2026 WMP).

Staff Recommendations for Idaho Power
Attachment A

- 1) Explain the rationale for the 240 meter buffer around assets.
- 2) Provide explanation of the method Idaho Power used to differentiate Yellow Risk Zones (YRZs) from Red Risk Zones (RRZs) (particularly with the recent modification of the area around Halfway, which transitioned to a Red Risk Zone).
- 3) Provide detailed model inputs, weightings, and methodology for designating locational risk and the manner in which asset history or equipment trends impact the designation of utility risks.*
- 4) Explain how risk mitigation results in changes in utility risk.*
- 5) Continue evolution of Tables 7 and 9, detailing state-level annual estimates and units for each mitigation tactic, with the resulting estimated risk reduction.*
- 6) Include details about command structure used during emergency activation, whether National Incident Management System (NIMS), Incident Command System (ICS), or other standards.
- 7) Identify general frequency and types of interactions with public safety partners.
- 8) Continue to outline how the Plan evolves based on feedback provided by public safety partners and others.*
- 9) Identify Community Based Organizations who are participating in community outreach supportive of Public Safety Power Shutoffs and what specific actions they are taking.
- 10) Discuss how Empower is used in Idaho Power's Oregon service territory.
- 11) As appropriate, identify how customers are able to use battery rebate or other programs to improve resilience to events such as Public Safety Power Shutoffs.
- 12) Ensure community outreach regarding Public Safety Power Shutoffs includes other safety topics appropriate for the community, leveraging relationships with public safety partners.*
- 13) Develop methods for determining the effectiveness of community outreach to improve awareness of and resilience to wildfire and other risks appropriate for the community.*
- 14) Discuss timing of inspection and correction frequency inside and outside high fire risk areas.
- 15) Discuss and demonstrate the use of ignition risk driver analysis and ignition historic analysis to determine optimal timing and completion of inspection and correction activities.
- 16) Discuss evolution of vegetation management program based on long term metrics developed in the Plan; where possible, continue to explore the relationship between fire history, outage history, and other indicators of optimization of the vegetation management program elements and provide information about learnings within the WMP.
- 17) Continue to engage in advancing its technology maturity and provide further details on the advances made (and their benefits) to reduced wildfire risk in future WMPs.*

(*) Indicates that the recommendation falls within Phase 2 of implementation of Joint Recommendations or does not seek additional information, and is not necessary to address in the 2025 WMP.

- 18) Report on results of joint utility maturity model pilot work and continue advancing wildfire maturity rubric in alignment with International Wildfire Risk Mitigation Consortium (IWRMC).
- 19) Provide history and other indicators of optimization of the vegetation management program elements and provide information about learnings within the WMP.
- 20) Continue to align IPC's ignition inspection
- 21) and root cause analysis processes with other Oregon utilities as well as other peers.

Timeframe for addressing Staff Recommendations:

	Recommendations:
Address in 2025 WMP	1, 2, 4-7, 9-11, 14-16, 18, & 19
Address in 2026 WMP (denoted with *)	3-5, 8, 12, 13, 17, & 20

(*) Indicates that the recommendation falls within Phase 2 of implementation of Joint Recommendations or does not seek additional information, and is not necessary to address in the 2025 WMP.

Joint Recommendations for Advancing Wildfire Mitigation Plans
Attachment B

Summary

The Commission has adopted a characterization of the wildfire mitigation plan (WMP or Plan) process as a journey, evolving over time. Staff’s Joint Recommendations represent a sizable step forward on that journey and a systematic shift towards Commission-guided maturation. The 2023 and 2024 WMPs have highlighted shared struggles associated with the lack of detail or clarity in the administrative requirements (OAR 860-300-0020), the quantity of data being requested by Staff through the data request process, inconsistent evaluation criteria from independent evaluators (IE), the number and prioritization of recommendations provided to each utility, as well as constrained timelines for WMP review. Public Utility Commission Staff’s (Staff) Joint Recommendations seek to clarify and streamline the WMP process, with an eye towards reducing workloads for Staff and the investor-owned electric utilities (IOU or utilities) and better aligning process with the timeframe allotted for evaluation of the Plans. Staff’s recommendations for advancing Oregon’s WMPs are summarized in the table below and then subsequently addressed in detail. Staff plans that each area of effort would result in proposed guidelines or templates for Commission consideration.

Table 1: Summary of Joint Recommendations

Phase	Effort Areas	Recommendation	Outcome	Leading
1	Process and Planning Cycle	Updated Process	Guidance for procedural steps WMP evaluation	Staff
		Updated Planning Cycle	Guidance on how to transition to multi-year planning	Staff
	Standardization of Elements	Data Templates	Templates which identify the appropriate information and level of granularity for data required in the WMP	Staff
2	Standardization of Elements	Shared Terminology	Glossary of shared terminology that can be used across WMPs	Utilities
		Shared Format	A format guide which adopts uniform chapter and section headings, as well as other agreed upon organizational features.	Utilities
	Working Group	Risk Quantification & Risk-Spend Efficiency	Guidance on risk quantification and a uniform risk-spend valuation methodology	Staff

Process for Implementation of Joint Recommendations

Staff's vision for the wildfire mitigation planning process is not to implement a top-down approach with prescriptive outcomes, but rather to provide the framework and language which enables clear communication and understanding of the WMPs. Implementation of the Joint Recommendations will require effort to align existing internal and external processes and communications with the resulting guidelines, the costs of such an effort are significantly outweighed by the benefits to the public. The risk of wildfires is too significant for the Commission to lack visibility into quantity of risk reduction or cost effectiveness of the WMPs.

Staff proposes that an appropriate WMP process should be:

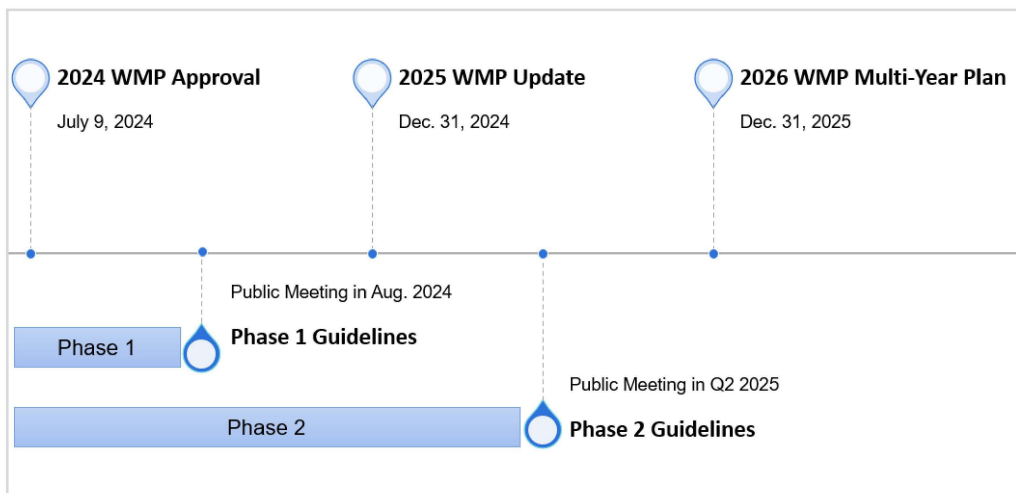
- **Meaningful:** Presents a Plan that is reasonably calculated to advance the goals or aims articulated. Articulates efforts which protect public safety, reduce risk to utility customers, and promote electrical system resilience to wildfire damage.
- **Robust:** Based on multi-scenario planning principles; considers the full range of technologies and mitigation types; recognizes the importance of maturation; attuned to changing risks.
- **Aligned:** Integrates with other safety and wildfire planning efforts; presents a coordinated approach to presentation of crucial information and communication with communities.
- **Adaptive:** Recognizes differences across utilities; balances well-defined Commission guidance with the flexibility for utilities to take ownership of the planning process and to adapt to a continually evolving landscape
- **Transparent:** Provides widespread system visibility; facilitates public understanding of risk and mitigation efforts in their communities.

Like the development of guidelines for distribution system planning (DSP) in UM 2005, Staff envisions development and implementation of WMP guidelines as an investigation occurring in a new docket.¹ The use of an investigation process would permit public participation and create a clear procedural venue in which to direct future WMP maturation.

While Staff had initially hoped to implement more of its recommendations for the 2025 WMP, the IOUs informed staff that development of 2025 WMPs are currently underway and changes impacting the Plan's development process are infeasible at this point. Staff is concerned about the Utilities' choice of a WMP development process that does not permit inclusion of new Commission direction but has nevertheless adopted a phased approach to implementing the Joint Recommendations, outlined in Figure 1.

¹ Under ORS 756.515(1), whenever the Commission believes that an investigation of any matter relating to any public utility or telecommunications utility or other person should be made, the Commission may, on its own motion, investigate any such matter.

Figure 1: Implementation Timeline



Staff believes the phased approach strikes the appropriate balance by taking steps towards implementation of the Joint Recommendations; providing additional, useful information to Commission in the short term, while still providing sufficient time for the working group to coalesce around draft recommendations and ensuring sufficient notice to the Utilities to permit incorporation of all Joint Recommendations in the 2026 WMPs.

Phase 1 addresses recommendations necessary prior to the 2025 WMPs. Staff understands that the envisioned timeline is extremely short. This was done intentionally to capture input of the IOUs that changes being implemented in 2025 Plans needed to be finalized as soon as possible. In all the Phase 1 recommendation, Staff carries the full workload to prepare proposed data templates and draft guidelines articulating the multi-year planning process and procedural steps for WMP dockets. This allows the IOUs to focus their resources on the active fire season.

Staff recognizes that the Phase 2 timeline is shorter than those for similar efforts in California but finds that the ability to leverage existing frameworks developed in other jurisdictions as well as three years of experience with WMPs leaves Staff well poised to lead development of guidelines in the time frame allotted.

Further, Staff finds it imperative to move the WMP process forward as quickly as feasible given the Commission’s responsibility to meaningfully evaluate WMP costs in a time of significant affordability concerns. The Utilities have suggested that Staff develop a back-up plan in the event that Phase 1 or Phase 2 guidelines cannot be completed in the time allotted. Due to the vital nature of this work Staff believes that any significant deviation from the process outlined should be approved by the Commission.

Updated Process and Planning Cycle

Many of the challenges presented by the WMPs center around the process. In prior years the schedules in WMP dockets, UM 2207, UM 2208, and UM 2209, were amended multiple times to accommodate additional process. Staff believes that the IOUs and Public Safety Partners would equally benefit from consistent expectations around WMP process. For clarity Staff does not recommend a specific calendar or timeline be adopted, but rather there be some clarity about what procedural steps can be expected; for instance, whether the WMP process requires publishing a draft Staff report or whether incorporation of recommendations can be required annually when preparation of WMPs begins months in advance. This also provides an opportunity for clarification of the independent evaluator's role in the WMP process.

To promote transparency and robust review of the Plans, WMPs should contain all information necessary for assessing compliance. Staff's need to understand nuances of the WMPs not contained in the body of the Plans has led to use of a set of standard data requests with over 100 questions. While Staff's intent is that use of data templates will help provide crucial information within the WMP, any failure to appropriately complete data tables or provide other information required in guidelines would result in similarly opaque Plans. To prevent such a result, Staff recommends development of a procedural process that ensures WMPs contain all necessary information prior to initiation of Staff's review. There are multiple options for effectuating this procedural guardrail including a pre-filling completeness check, as required in California,² or restarting the clock if an errata filling is required for completeness. Staff recommends a process be proposed by Staff with input from stakeholders for completion in 2025.

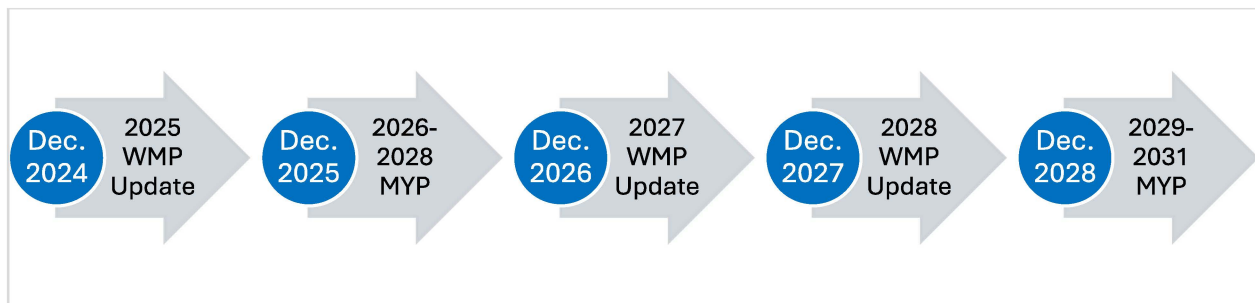
- A. All utilities should provide Plans that allow a determination on compliance within the body of its Wildfire Mitigation Plan. (Phase 2).
- B. All utilities should provide multi-year Plans which are updated on an annual basis. (Phase 1).

To promote a collaborative effort toward advancement of the WMPs Staff recommends that multi-year WMP plans be filled on a regular cycle, with WMP updates being filled in years in between multi-year Plans. Staff believes that three-years is an appropriate starting place for multi-year Plans, however longer-term Plans may be reasonable as the process matures. This approach allows new recommendations or guidelines to be implemented in the next multi-year Plan while also creating opportunity for the utility to make changes to its Plan annually. This recommendation addresses the concerns about the need for additional timing and limited personnel resources raised during coordination with the IOUs.

² California Office of Energy Infrastructure Safety, 2023-2025 Wildfire Mitigation Plan Process and Guidelines, [TN11746_20221207T142120_20232025_WCaliforMP_Process_Guidelines \(2\).pdf](#).

Staff finds this approach consistent with ORS 757. Language directing the Commission to provide a schedule for updates to WMPs and instructing the Commission on its time frame for approval of “a plan or plan update.” Additionally, this procedural change should free up resources allowing Staff and the IOUs more opportunity to collaborate towards Plan advancement. The WMP process would be outlined by Staff with input from stakeholders for completion in September of 2024. Figure 2 outlines Staff’s vision for the multi-year planning cycle over the next five WMPs.

Figure 2: Implementation of Multi-Year Plans for WMPs



Staff envisions the 2025 WMP update as containing the following:

- Significant updates to the 2024 WMP;
- Information addressing Staff’s recommendations for each utility; and
- Standard data tables approved in Phase 1

Further clarification of WMP update contents would be presented to the Commission as part of the Phase 1 WMP guidelines and implemented in the 2025 WMPs. The guidelines would need to address the threshold for considering Plan updates significant, information required for significant updates, expectations if a utility has no update to its previously approved WMP, and directions for how an update addresses Staff recommendations. Staff intends that inclusion of the Phase 1 data templates in the 2025 WMP will serve as a test-run for each utility, providing experience working with the templates as well as identifying what information, if any, the Utility currently lacks and how it will obtain the required information for the 2026 or future plans. While Staff expects each utility complete the data templates to the best of its ability, it does not believe they should inform a compliance determination prior to the 2026 Multi-Year Plan.

Standardization of Elements (WMP Format, Glossary, & Data Tables):

The procedural aim for development of standardized WMP structure, definitions, and data templates is to split the work between Staff and the utilities, charging the IOUs with developing a shared set of terminology and standard format while Staff focuses on

developing data templates, see Figure 1. Staff intends that these proposals would then be posted to the docket for public comment. Data templates are recommended for development as part of Phase 1 and would be presented to the Commission as part of the Phase 1 WMP guidelines for approval prior to implementation in the 2025 WMP. The glossary, format guide, and any data templates related to risk quantification or risk-spend efficiency would be presented to the Commission as part of the Phase 2 WMP guidelines for approval prior to use in the 2026 WMPs.

Staff initially hoped for the WMP format and glossary to be implemented in the 2025 WMPs. To address the IOUs' concerns with timing, Staff ultimately chose to include these recommendations in Phase 2, for implementation in the 2026 WMPs.

- C. All utilities should participate in a joint utility effort to move towards use of shared terminology throughout the WMPs. The utilities must agree upon and use a standard WMP glossary which articulates shared terminology, and any differences in use of terminology between the utilities in the 2026 Plans. (Phase 2).
- D. All utilities should provide WMPs in a standard format which adopts uniform chapter and section headings, as well as other agreed upon organizational features. (Phase 2).

Without a shared language, Staff is concerned that the conversation around WMPs cannot advance. The IOUs use the same term inconsistently among the utilities and inconsistently within the same company year over year. While Staff does not make recommendations about terminology used for utility internal processes, it is confident that the IOUs can instruct their employees and operate their systems in a safe manner. While the IOUs expressed concern that standardizing terminology citing could result in confusion to stakeholders or employees, the Utilities are generally supportive of alignment efforts.

The inclusion of standard formats in Phase 2 gives the utilities additional time to prepare stakeholders and internal teams. Additionally, a format shared across the utilities means that stakeholders will be able to identify where in the Plans salient information is located for all three utilities at once. Staff is confident that the Utilities can develop a format which provides sufficient flexibility for the IOUs to include all significant information while preserving the usefulness of WMPs outside the compliance context. IOUs expressed similar concerns around standardizing WMP format, citing existing stakeholder expectations and use of WMPs in multiple forums, however the Utilities are ultimately supportive of alignment efforts.

Portland General Electric (PGE) Idaho Power (IPC), and Oregon Citizens' Utility Board (CUB) all support Staff's recommendations on a glossary and standard WMP format. Pacific Power's comments did not address the Joint Recommendation for development

of standard format or glossary. Staff has no intent to limit information in the WMPs, and in fact aims to increase information provided, by introducing a shared format and data templates. For all three utilities the Independent Evaluator's Report noted that information was unclear or hard to locate.³ After three unsuccessful attempts by Staff in describing how it expects data presented, Staff believes that providing a format and template is the best way to ensure expectations are met.

- E. All utilities should provide the program level details through a standard reporting templates. (Phase 1).
- F. All utilities should provide inspection & correction data through a standard reporting template which facilitates comparisons of inspection functions, costs (at unit level), and amount of work across the IOUs (and potentially benchmarkable across a broader region). (Phase 1).
- G. All utilities should provide vegetation management data through a standard reporting template which facilitates comparison of inspection functions, costs, and amount of work across the IOUs. Given the large costs expended or forecasted to achieve "optimal" clearance, a standard data template should include information about vegetation management program administration, work scopes, and costs by clearance objectives. Again, this information should be comparable across the IOUs in Oregon (a broader regional perspective may be useful in this area). (Phase 1).
- H. All utilities should provide industry engagement information through a standard reporting template which outlines participation in industry forums & expected information to be shared in such forums, including results from pilots prior to widescale adoption, and pilot valuation methods. (Phase 2).
- I. All utilities should provide pilot technology information through a standard reporting template which includes: details of pilot projects, goals for the pilot, status of the pilot (planning, development, implementation), the current penetration and saturation across the system, envisioned application, milestones for determining usefulness of pilot, expected capital costs, expected O&M costs, expected timeframe for pilot implementation and lifespan. (Phase 2). At minimum this level of detail is needed for the following pilot technologies:
 - Communicating Fault Circuit Indicators (CFCI);
 - Fuel load reduction projects;
 - Wildfire detection cameras;
 - Early fault detection;
 - Drone inspection pilot;
 - Distribution fault anticipation
 - Covered conductor or spacer cable; and

³ Docket No. UM 2207, 2024 PAC WMP Independent Evaluator's Report, CWS Strategies, June 12, 2024; Docket No. UM 2208, 2024 PGE WMP Independent Evaluator's Report, CWS Strategies, June 12, 2024; Docket No. UM 2209, 2024 IPC WMP Independent Evaluator's Report, CWS Strategies, June 12, 2024.

- Infrared patrols.

The Utilities are generally supportive of standard data templates, to provide clear expectations about the information expected for inclusion in the WMPs. PAC raises some concerns about the listing of specific technologies in Joint Recommendation I. Staff believes there may be confusion around an intent to constrain pilot technologies. While the technologies listed in Joint Recommendation I includes the technologies currently being piloted by the IOUs, the standard data templates will provide a pathway to detail these or any other technologies piloted by a utility.

Staff finds that implementation of a shared glossary, format, and data templates will reduce complexity, ease location of information, and streamline identification of information missing from a Plan. Standardized WMP elements further increases robustness, transparency, and alignment of the Plans.

Establishment of WMP Working Group:

Staff recommends establishment of a WMP working group to guide maturation of the WMPs. Moreover, Staff recommends working group's first areas of focus should be risk quantification and risk-spend efficiency (RSE). In adoption of the 2022 WMPs, the Commission directed the utilities to explore calibration of risk modeling methodologies and detail progress towards a uniform risk-spend valuation method.⁴ Staff understands that the IOUs had multiple conversation about calibration of risk modeling and alignment of risk-spend methodologies but did not reach any results nor articulate a plan that would allow for near-term alignment. Given that the understanding of risk and assessment of risk spend efficiency determines the selection of mitigation measures and entails billions of spend, Staff believes that continuing a utility led alignment process on these issues is not viable. To that end, the Staff-led working group should propose risk quantification and risk-spend efficiency modeling guidelines to the Commission for approval prior to implementation in the 2026 WMPs. Understanding that RSE cannot be determined without first quantifying risk, Staff intends that the Working Group would first address risk quantification before turning its efforts towards RSE.

- J. Staff foresees the working group allowing participation the public, including Public Safety Partners, wildfire experts, and impacted communities. Staff has chosen not to include more detailed information on Work Group meeting schedules or plans at this time and intends these would be developed in consultation with the Utilities and stakeholders if the Joint Recommendations are

⁴ Order No. 23-220, *In the Matter of Pacific Power 2023 Wildfire Protection Plan*, Docket No. UM 2207, June 26, 2023; Order No. 23-221, *In the Matter of Portland General Electric 2023 Wildfire Protection Plan*, Docket No. UM 2208, June 26, 2023; Order No. 23-222, *In the Matter of Idaho Power Company 2023 Wildfire Protection Plan*, Docket No. UM 2209, June 26, 2023.

approved. All utility risk maps should originate from a foundational utility risk map which considers the logical set of variables. Short range outlooks, as well as mid-range outlooks may inform the foundational map. After developing the foundational map, a utility risk map can consider and overlay a variety of conditions, such as response times and locale as well as locations where mitigations have taken place or recent fuel has been removed. Any adjustments made to the foundational risk maps or the outlooks, should be explicitly identified and recorded as to what variable caused the change and what new information supported this change. (Phase 2).

- K. All utilities should collaborate to calibrate their risk modeling methods and identify the underlying assumptions in determining line segment risk. Some of the assumptions might include fire spread modeling periods, probability being considered, fire weather history, and inclusion of response likelihood. This work approach would result in fundamental agreement on a specific modeling method for which each utility would produce its current asset register, as well as GIS and tabular data identifying the risk scoring for each asset. (Phase 2).
- L. The WMP working group should adopt Risk Mitigation and Cost Valuation (RSE) as its part of its area of focus. This Staff led working group should propose risk quantification guidelines to the Commission for implementation in the 2026 WMPs. RSE should reflect granular data for electric assets which quantify risk that is derivative of operational data (include outage and device state information), observational data (inspections), temporal data (snapshots in time related to peripheral systems) and should fully comprise all the facilities that are part of the utility's HFRZ. Consistency of terminology, data sources and their confidence, and expected calculation processes should be prepared by the utilities but performed consistent with guidance by the PUC. In addition, RSE needs to recognize the manner in which "risk" is quantified by the utility, and generally result in an agreed-upon method for the quantification and the way that the reduced risk will be measured. This could leverage PacifiCorp's "composite risk" or one of the other IOU's risk quantification methods. (Phase 2).

The Utilities expressed concern about ability to implement new guidelines in the 2025 WMPs. To address timing concerns Staff recommends a phased approach, allowing resulting guidelines to be implemented into the 2026 WMPs. PGE's and IPC's comments expressed support for establishing a common risk framework. PAC's comments seemed to misunderstand Joint Recommendation J as a suggestion for a statewide wildfire hazard map, similar to the one tasked to the Oregon Department of Forestry by Senate Bill (SB) 762 (2021).

To clarify, Staff is not asking for development of a statewide risk map, nor does it expect the utilities considerations of risk to look identical. Staff understands that Oregon's three IOUs operate in vastly different environments and that WMP guidelines will need to take the significant differences between the IOUs' service areas into account. As articulated

in its recommendations on the 2023 WMPs, Staff's goal is to understand where risk is similar, where it is different, and what factors contribute to differences.

While the considerations detailed in Joint Recommendation J and K are intended to create a jumping off point in the WMP Working Group's discussions of risk, additional considerations can, and should, be included. Here again, the goal is not to require a specific outcome, but rather to be able to clearly tell where each source of risk originates (landscape and terrain, weather, utility assets, etc...). Staff finds that clear guidelines on risk modeling and risk-spend efficiency promote meaningful, robust, and transparent WMPs.

Use of Working Group to Guide WMP Maturation:

Staff provides additional topics that may be appropriate for the joint working group after the 2026 WMPs to be directed at the Commission's discretion.

- M. All utilities should regularly participate in a cross-utility effort, via working group or other format, to share experience, learnings, and industry best practices, surrounding system reliability. At minimum, this effort should include discussion of sophisticated protection control equipment and its application to sensitive settings, consideration of impact to reliability, in particular the response during elevated risk season with repeated outages to customers when "self healing" is not in place (resulting in them experiencing nuisance trips). This group should not only consider impacts to system level reliability but consider impacts of momentary interruptions and longer sustained outages to remote customers, particularly those which may be less able to sustain during poorer reliability periods.⁵
- N. All utilities should regularly participate in a cross-utility effort, via working group or other format, to share experience, learnings, and industry best practices, for identifying and coordinating with Public Safety Partners, building on the ground relationships and communication, developing livestream/recorded multi-language community meetings, and coordinate with local communities to participate in safety fairs.
- O. All utilities should collaborate to develop consistent content (and should conform to generally consistent language) to inform customers, communities and public safety partners about operational protocols which can impact their power reliability and power system operations. As a complement to these approaches, utilities should perform analysis regarding the location-specific impacts to reliability, including the increase in customer complaints internally as well as those recorded by the OPUC consumer services division, and develop methods

⁵ Content regarding this approach can be found at California Office of Energy Infrastructure Safety, 2022 Wildfire Mitigation Plan Update Guidelines, <https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=51912&shareable=true>.

to quickly react to heightened operations impacting customers' reliability. Customers and communities may benefit from awareness of other outage causes (beyond weather), which impact reliability and during "sensitive settings" or "fire season" period or which could result in unusual reliability.

- P. All utilities should collaborate to develop a "template" for reporting PSPS details during the execution of a PSPS, and Staff would appreciate participating in these sorts of collaborative development efforts.