ORDER NO. 24-326

ENTERED Sep 23 2024

BEFORE THE PUBLIC UTILITY COMMISSION

OF OREGON

UM 2340

In the Matter of PUBLIC UTILITY COMMISSION OF OREGON, Investigation Into Guidelines for Wildfire Mitigation Plans.	ORDER

DISPOSITION: STAFF'S RECOMMENDATION ADOPTED

This order memorializes our decision, made and effective at our September 19, 2024 Regular Public Meeting, to adopt Staff's recommendation in this matter, modified to provisionally adopt Staff's Wildfire Mitigation Plan Data Guidelines. The Staff Report with the recommendation is attached as Appendix A.

We provisionally approve Staff's data guidelines with the direction that the utilities use best efforts to provide the data requested by January 1, 2025. We expect the utilities to make best efforts to fill out the templates without incurring significant incremental costs (*e.g.*, to upgrade systems or add personnel) in consultation with Staff to ensure mutual understanding of the information sought. Utilities should strive to make meaningful advances in the quality, clarity, and completeness of their data collection and reporting, while also identifying with specificity and concreteness areas where the costs and challenges associated with Staff's template expectations are out of proportion to their ability to advance the PUC's goal of maturing analysis of cost-effective wildfire risk mitigation. To that end, as part of their January 1, 2025 filings, utilities should describe any discrete elements of the templates that would create material cost impacts, including a cost estimate, and propose alternatives.

Staff should work with utilities early in 2025 to consider the value of those higher cost data elements to the risk, spend, efficacy and efficiency work that will happen in Phase 2. We anticipate that this may result in the utilities providing some incremental data template elements in their final 2024 data on March 31, 2025. We also anticipate this

work will result in revisions to the data template for the next reporting cycle. In either case, the template will remain subject to evolution in future cycles.

Made, entered, and effective Sep 23 2024.

Megan W. Decker
Chair

Letha Tawney
Commissioner

Les Perkins
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.

ITEM NO. RA3

PUBLIC UTILITY COMMISSION OF OREGON
STAFF REPORT
PUBLIC MEETING DATE: September 19, 2024

REGULAR X CONSENT ____ EFFECTIVE DATE N/A

DATE: September 12, 2024

TO: Public Utility Commission

FROM: Heide Caswell

THROUGH: Bryan Conway and Caroline Moore **SIGNED**

SUBJECT: OREGON PUBLIC UTILITY COMMISSION STAFF:
(Docket No. UM 2340)
Phase 1 WMP Guidelines for 2025 Plan Update.

STAFF RECOMMENDATION:

The Public Utility Commission of Oregon (Commission or PUC) should approve the Wildfire Mitigation Plan (WMP) Guidelines for use by investor-owned electric utilities.

DISCUSSION:

Issue

Whether the Commission should approve the following proposed Wildfire Mitigation Plan (WMP) guidelines:

- WMP Planning Cycle Guidelines,
- WMP Update Guidelines, and
- WMP Data Guidelines.

Applicable Law

This docket was opened as an investigation under ORS 756.515(1). As further provided in ORS 756.515(4), after making an investigation, the Commission may make such findings and orders as the commission deems justified or required by the results of its investigation.

ORS 756.040 describes the general powers of the Commission to supervise and regulate every public utility, and to do all things necessary and convenient in the exercise of that authority.

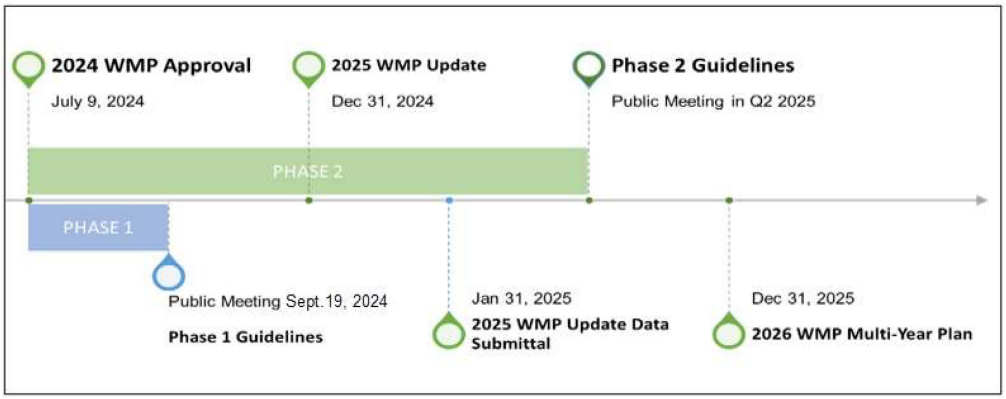
Senate Bill (SB) 762 (2021), incorporated as ORS 757.960 through 757.969, established standards for electric utility's Wildfire Mitigation Plans and directs the Commission to evaluate electric companies' risk-based wildfire mitigation plans and planned activities to protect of public safety, reduce risk to utility customers, and promote electrical system resilience to wildfire damage.

Analysis

Background
In Order Nos. 24-230, 24-231, and 24-232, at the July 9, 2024, public meeting, the Commission approved Staff's Joint Recommendations for advancement of Wildfire Mitigation Plans (WMP or Plan)[1].

These recommendations included a multi-phase Commission-led process to develop WMP guidelines. Additionally, Staff proposed establishing an investigation in a new docket to permit public participation and create a clear procedural venue in which to direct future WMP maturation. It introduced a schedule and process shown in Figure 1 below.

Figure 1: Implementation Timeline



[1] See generally, Order No. 24-230, In the Matter of PacificPower 2022 Wildfire Protection Plan, Docket No. UM 2207, July 10, 2024; Order No. 24-232, In the Matter of Portland General Electric 2022 Wildfire Protection Plan, Docket No. UM 2208, July 10, 2024; Order No. 24-231, In the Matter of Idaho Power 2022 Wildfire Protection Plan, Docket No. UM 2209, July 10, 2024.

Order No. 24-260 initiated the investigation into guidelines for Wildfire Mitigation Plans and established Docket No. UM 2340. On July 23, 2024, Staff posted a proposed schedule, and on July 26, 2024, Staff posted its Phase 1 Proposal which addressed the elements listed above and requested public comment.[2] Combined comments were received from Northwest Energy Coalition (NWEC) and Oregon Citizens' Utility Board (CUB), and comments were received individually from Idaho Power Company (IPC), PacificCorp (PAC), and Portland General Electric (PGE). Staff held two workshops with stakeholders and adjusted its proposal based on the written comments and feedback in the workshops.

The Phase 1 timeline was set to ensure that changes being implemented in 2025 Plans were finalized as soon as possible. Staff believes that approval of its proposal is vital to provide additional and useful information to Commission in the 2025 WMPs and solidify an understanding regarding the granularity of data required in the WMPs as a foundational step for risk quantification work in Phase 2.

As outlined in the Joint Recommendations, Phase 1's scope included development of the following:

- Guidelines on the procedural steps for WMP evaluation (Updated Process);
- Guidelines for transitioning to multi-year planning (Updated Planning Cycle); and
- Templates which identify the appropriate information and level of granularity for data required in the WMP (Data Templates).

[2] *See* Docket Nos. UM 2207, UM 2208, and UM 2209, Staff's WMP Phase 1 Proposal, July 26, 2024.

Table 1: Summary of Joint Recommendations Adopted in July 2024

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	Template which identifies 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

This memo discusses the rationale supporting Staff's proposal, summarizes comments received by stakeholders, and discusses next steps in the UM 2340 docket. Staff's proposal is provided in full as Attachment A.[3] This memo also discusses the proposal in several parts. The first part focuses on the Updated Process and Planning Cycle Guidelines, the second focuses on the WMP Update Guidelines, and the third focuses on Data Guidelines which includes the WMP Data Template Workbook.[4]

WMP Review Process

Staff's proposal in this memo differs from the Joint Recommendations in Table 1, which had previously offered an approach for the WMP review process. The earlier proposals included procedural steps for a WMP docket and outlined the roles of Staff and an Independent Evaluator (IE). In engaging with stakeholders, substantial differences regarding that approach made clear that additional dialogue is needed to resolve this process. Due to the need to finalize guidelines necessary for the filing of 2025 WMP Updates, Staff proposes adopting guidelines on Planning Cycles, WMP Updates and WMP Data Template Workbooks now. Staff will continue the development of the WMP

[3] Staff's proposal incorporates changes made to Staff's initial Phase 1 Proposal in response to written stakeholder comments and comments at the September 4 and 5 public workshops.
[4] The contents of the WMP Data Template Workbook provided is a PDF print out of the excel workbook. Staff provided copies of the WMP Data Template Workbook in excel form to the service lists for UM 2207, UM 2208, and UM 2209. Staff's request for comment on its Phase 1 Proposal noted that copies of the excel template workbook are available upon request.

review process for adoption later in 2024 by convening further workshops to detail the specific steps that should be required.

Table 2: Staff Proposal Contents

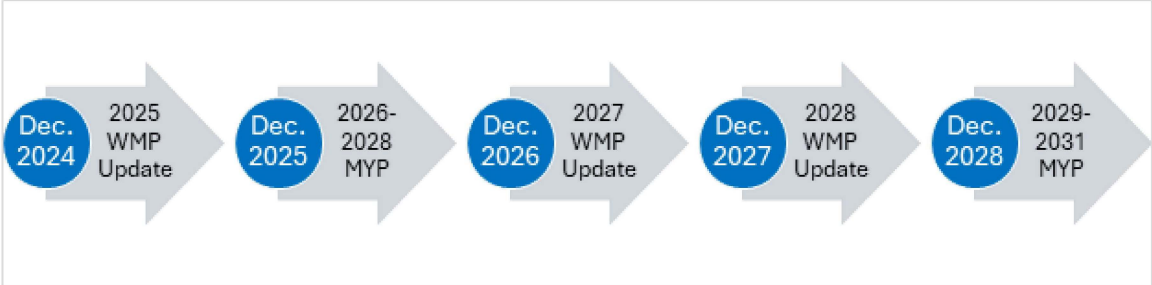
WMP Planning Cycle Guidelines	1. WMP Planning Cycle 2. WMP Filings
WMP Update Guidelines	1. Update Contents 1.1 Contents if No Updates Required 2. WMP Regulatory Compliance Index 3. Significant Updates to Key Plan Elements 3.1 Key Plan Elements 3.2 Risk Model 3.3 New or Discontinued Initiatives 3.4 Initiative Updates 4. Areas for Additional Improvement 5. Other Contents Required by the Commission
WMP Data Guidelines	1. Overview 1.1.Submission Schedule 1.2.Errata, Revisions, and Versions 2. WMP Data Workbook 2.1.Filling out the WMP Data Workbook 2.2.WMP Data Workbook Cover Sheet 2.3.Substantive WMP Data Workbook Sheets 3. Risk and Ignition Event Categorizations 3.1.Risk and Ignition Event Table 3.2.Mitigation Categories and Activities 4. Appendix A: Definitions

WMP Planning Cycle Guidelines
While the utilities will continue to make annual WMP filings, a modified planning cycle is envisioned to create regulatory and operational efficiency. Transitioning to a multi-year planning cycle is necessary to address the challenges posed by the current structure of the WMP review process and addresses the considerable time constraints associated with producing a full WMP each year, allowing for time for Staff, the utilities, and the WMP working group to focus on Plan maturation and emerging issues. This approach allows new recommendations or guidelines to be implemented in the next Multi-year WMP while also creating opportunity for the utility to make changes to its Plan annually.

The Planning Cycle guidelines adopt a three-year planning cycle. In 2024, the utility filing for 2025 will be a WMP Update. This approach provides a runway for a more

substantial filing in 2025 (for the 2026-2028 Multi-year WMP). Thereafter, multi-year plans will be filed every three years, with interim WMP Updates which modify the upcoming year in detail, while providing only program levels for the balance of the remaining three years in those Plan Updates.

Figure 2: Multiyear Planning Cadence



Stakeholder Comments
Stakeholders were supportive of the transition to a three-year planning cycle and use of Multi-year WMPs and WMP Updates. Staff received no stakeholder input opposing the use of multi-year planning.

WMP Update Guidelines
The WMP Update section outlines the specifics for WMP Update submission, confidentiality, and contents including:

- WMP Regulatory Compliance Index,
- Significant changes to key plan elements from updates to the previous WMP filing or applicable Multi-year WMP,
- Steps taken towards implementation of Areas for Additional Improvement, and
- Any other contents required by the Commission.

The first content requirement is a WMP Compliance Index, which is a table identifying where the most current information is located for each WMP requirement articulated in the administrative rules. This requirement recognizes that information could be spread out among the Multi-year WMP and within multiple WMP Updates.

Second, the WMP Update guidelines articulate the thresholds triggering the requirement to include changes in a WMP Update as well as the contents which must be reported for those significant changes. The Update guidelines require reporting significant changes to:

- Risk Models;

- New or Discontinued Initiatives; and
- Approved Targets, Objectives, or Expenditures for Existing Initiatives.

In addition to significant changes, the guidelines also require reporting on Areas for Additional Improvement, or those areas which the Commission has required additional action or reporting.[5]

Lastly, utilities must include any other contents required by the Commission in a WMP update. As an example, in the orders approving the 2024 WMPs the Commission directed the utilities to discuss what would be necessary for the utility to provide all information requested in the WMP Data Template Workbook.[6]

WMP Data Submission Schedule
A fully complete WMP includes both the Plan as well as the supporting data that results in the documented plan. Below is the proposed timeframe for each of the elements. Due to the need for Plans to be filed by December 31, according to legislation, fourth quarter details are augmented into an initial filed dataset.

Table 4: Submission Element Description Deadline

Submission Element	Description	Deadline
2025 WMP Update	WMP Written Plan	December 31, 2024
2025 WMP Data Template Workbook Initial Filing	Including data through Q3 2024	December 31, 2024
2025 WMP Data Template Workbook Final Filing	Updating data through Q3 2024 and appending Q4 2024	March 31, 2025

Stakeholder Comments on WMP Planning Cycles and WMP Plan Updates
Stakeholders have been generally supportive of the contents of the WMP Update Guidelines. Staff received comments related to appropriate thresholds for reporting significant updates to key plan elements, including risk and initiative adjustments. Staff discussed the threshold concerns with stakeholders during the September 5, 2024, workshop, and utilities shared concerns about minimal changes needing to be reported. However, due to the variations in the electric utilities service territories, customers served, and initiatives undertaken and their magnitude, Staff provides specific thresholds that are scalar for each initiative. Staff believes this is a good solution to

[5] In prior WMP Approval Orders these have been designated as "Staff Recommendations" and when adopted in full or partly by the Commission, would now be treated as Areas for Improvement.
[6] Order No. 24-232.

reconcile these variations. In addition, the utilities expressed concern about due dates for data submission. Originally, Staff proposed a February due date for the full prior year data, however the utilities indicated certain information would not be final, generally, for the fourth quarter until late March. As a result, Staff's proposal includes an initial submittal with data through the third quarter with an updated filing at the end of March for any updates to prior data and the addition of the fourth quarter data. This allows Staff to begin analysis of a large portion of the data supporting their plans rather than losing the first half of its review period.

WMP Data Guidelines

Overview
The first section of the WMP Data Guidelines provides an overview of procedural aspects for the data templates including due dates, process for requesting confidential treatment, and instructions for amending previous submittals.

WMP Data Template Workbook
The second section provides requirements for completeness and consistency of submitted data, as well as a detailed explanation for filling out each table, including: fields identified, description of the fields, and expected domains or ranges. The Data Template Workbook consists of 12 tables and a cover page, summarized below.

- **Data Workbook Cover Sheet**: Provides a general report overview and outlines individual responses unique to each of the reporting utilities.
- **Table 1:** ***System Overview*** is used to provide a summary or snapshot of the system assets for the reporting period, distinguished by the type of wildfire risk level identified by the utility, including company assets, risk areas, and risk events for the relevant period. This table serves as a system overview and baseline.
- **Table 2**: ***Initiative Data*** requires the utilities to provide a summarized list of their specific programs and activities and asks the utilities to interpret and link their specific initiatives to an OPUC initiative classification and activity (defined in section 3.2 of the WMP Data Template Workbook). The table requests an overview of the electric utility's goals, objectives, targeted risk reduction, the expected units and spend for the relevant period, and a company status of the program/activities. Table 2 also provides the utilities with the ability to note the page number in the written WMP report as a reference to locate more detailed information as to the utilities specified program. Note, Table 13 requests additional initiative details after the utilities program alignment to the OPUC's initiative categories and activities.

- **Table 3**: ***Transmission and Distribution Inspections*** includes reporting on the utility's overall transmission and distribution asset inspection program(s), consistent with OAR 860-024 as well as other inspection actions separately undertaken by the utility; it enumerates asset location risk designation, relevant period found, inspection type and method, inspection finding, including its priority.
- **Table 4**: ***Transmission and Distribution (T&D) Correction*** builds upon the inspection results and findings provided in Table 3, including specific corrections completed by the utility for the relevant period, correlated to the inspection finding period associated with its priority, as well as reporting year risk designation, inspection type and method.
- **Table 5**: ***Vegetation Management*** includes vegetation management inspections, findings and results which took place in the relevant period, and includes vegetation program actions, which includes summary data of inspection types (routine, high fire risk, quality assurance), finding groupings and corrections performed by reporting year risk designation.
- **Table 6**: ***Performance Metrics*** allows utilities to report any additional metrics tracked and used to evaluate wildfire mitigation performance. This information may be useful to explain co-benefits as well as other internally relevant performance metrics resulting from wildfire mitigation efforts.
- **Table 7**: ***Risk Performance*** summarizes risk based on weather patterns significant to fire risk potential, exploring relationship between utility risk designated periods as well as publicly identified risk periods, and occurrence within quarters for identified Plan Year Risk Designation areas. The table also summarizes system reliability metrics (including and excluding planned and major events) and customer reliability inquiries and complaints by quarters.
- **Table 8**: ***Risk Event Drivers*** provides an overview of situations which are considered risk events but had no association with ignitions and includes wire down and outage events.
- **Table 9**: ***Ignition Events*** summarizes ignition events for various dimension of data analysis and includes ignition data based on ignition event driver, event type, line type and the utilities' Plan Year Risk Designation for various locations.
- **Table 10**: ***Equipment Area Index*** outlines utility equipment and customer counts across the utilities' Plan Year Risk Designation with other land classifications (such as urban/suburban/rural, in combination with wildland urban interface).
- **Table 11**: ***Equipment Area Index Changes*** summarizes additions, removals or upgrades to utility equipment across the utilities' Plan Year Risk Designation with other land classifications (such as urban/suburban/rural, in combination with wildland urban interface).
- **Table 12**: ***De-energization and PSPS Metrics*** outlines specified de-energization and PSPS-related metrics for the reporting year.

- **Table 13**: ***Mitigation Initiative Targets*** summarizes actual and projected costs and units for initiative activities. This table requires project level detail on 2025 efforts and program level work units and budgets for at least two additional years. The table 13 provides an associated relationship to the electric utilities programs and activities outlined in Table 2.

Stakeholder Comments on Data Guidelines
Comments from stakeholders were generally supportive of the proposed Guidelines, though most parties identified specific requests for changes. Staff developed a redline of its proposal showing changes made in response to Stakeholder Comments, attached to this memo as Attachment B. Further, comment summaries by parties are shown in Attachment C, and also identifies how and when Staff envisions the issue will be addressed.

Importantly, stakeholders requested additional time to afford further engagement in the process. As a result, Staff posted an updated schedule and held two workshops on September 4 and 5, 2024, focused heavily on data and process for 2025 Plan Updates.

During these workshops Staff and the IE outlined how specific information being requested by Staff has been used to support actions taken with California's utilities in their WMP efforts. Staff further discussed how it tailored the data requested to recognize Oregon specific regulations and other variations within the state and explained its intention to replace previously used data requests with the structured data being produced here.

Comments were received from stakeholders about the importance of ensuring transparency as data workshops are held, including recording these sessions should stakeholders be unable to attend. Staff finds this request consistent with its goal for transparency in this docket.

Staff acknowledges that developing the data reporting processes and the data collection systems will require time and effort, however, Staff and utilities have invested time in prior years with data requests and workshops exploring data supporting the plans and this effort should be minimal with adoption of the WMP Data Workbook Template.

Additionally, there was concern regarding the data including both retrospective and prospective attributes, however, Staff's position is that without a comparison to history and acknowledgement of prior activities that are supportive of a safe and reliable system, it's not possible to identify the extent to which new efforts and investments are increasing the safety or reliability of the system, therefore baseline data is essential for Staff analysis. Stakeholder comments support Staff obtaining access to information to

rationalize the investments being made by utilities on behalf of customers. They particularly focus on the substantial cost increases being experienced by customers and note the importance of data that substantiates the value of these investments.

Staff acknowledged during the workshops and in the Guidelines that not all data will immediately be readily available or easily produced, however establishing rigor in the submittal and analysis process will afford utilities and Staff efficiency in the investigation process. For example, not all utilities may have estimates of how many trees their conductors are in proximity with, however Staff can work with these utilities to estimate some proxy for such attributes. For instance, circuit miles with canopy densities or other measurable values. Staff explained its intention to work with the utilities during the upcoming months should there be "proxy" or approaches for estimating requested data, in the absence of certain of the data elements, however, emphasizes the importance of evolving systems to provide the specific data within the WMP Data Template Workbook.

Staff shared previously in the wildfire planning dockets, UM 2207, UM 2208, and UM 2209, the importance of the data driving the decisions and mitigations summarized in WMPs. Staff's development of the Data Guidelines and Data Workbook Template is consistent with the orders approving the 2024 WMPs and creates a clear structure for data needed for Staff's analysis. Given the large investments being made by utilities, considers this to be time and money well-spent, especially as the plans begin to estimate risks, risk reduction and the costs for risks to be further reduced (as is intended in Phase 2).

Implementation for Data Guidelines
Staff anticipates that it will convene several workshops during the next several months which will target and explore data that is currently available, as well as approaches for proxy data as mentioned previously. While proxy data is expected in the short term in certain areas, Staff will work with the utilities as they develop plans for providing submissions consistent with the data guidelines. Ultimately, Staff plans to bring utility specific data plans, describing use of proxy data and timing for developing the capability to providing specific data requested to the Commission for approval prior to the filing of 2026-2028 Multi-year WMPs.

Stakeholder Comments on Community Outreach
Staff received significant comments reflecting the need for better engagement with communities regarding short term and long-term impacts to communities due to changes made within the electrical network during elevated fire risk periods, and the need for validation and verification of work performed by the utilities to ensure they are deployed in a manner that doesn't shift fire risks to customers or communities. Thereafter, comments filed by a variety of stakeholders identified the need for greater

community awareness of wildfire mitigation efforts by utilities, particularly those related to reliability impacts to communities and work being done within communities. These efforts will require involvement of utilities, Staff, and community stakeholders, including public safety partners.

While Phases 1 and 2 did not explicitly outline the importance of various outreach activities to communities and customers, Staff's Joint Recommendations included recommendations to utilities about evaluating outreach effectiveness, reliability consequences of operational practices, and recognizing the short- and long-term community impacts of wildfire mitigation plans. The stakeholder comments highlighted how important this topic.

As a result, Staff recommends addressing this in two ways. First, Staff augmented data being provided by the utilities regarding customer contact for outages and reliability complaints for customers served in designated fire risk areas. Second, Staff proposes to facilitate discussions related to community outreach among Staff, the utilities, community advocates, and public safety partners in parallel with Phase 1 and 2 activities. Staff will develop and post to the docket a plan to move this conversation forward, after consultation with stakeholders.

Conclusion

The proposed Guidelines are the result of extensive analysis of data reporting conducted in California Wildfire Mitigation Plans, discussion with stakeholders, exploration of timing and viability of process, and data usefulness. Stakeholders demonstrated significant engagement and provided valuable information and input.

The resulting proposal will enable the Commission to better understand the current state of wildfire mitigation efforts being conducted by the utilities, using a data driven approach that complements the WMP written content. Further, the proposal for continued advancement in Phase 2 will enable the Commission to ensure that important efforts such as risk quantification, risk valuation are accomplished while concurrently ensuring communities better understand interim effects of wildfire mitigation. Finally, Staff recommends the Commission approve the WMP Phase 1 Proposal as set forth in Attachment A.

PROPOSED COMMISSION MOTION:

Approve the following Wildfire Mitigation Plan (WMP) guidelines for use by the investor-owned electric utilities:

- WMP Planning Cycle Guidelines,
- WMP Update Guidelines, and
- WMP Data Guidelines.

Wildfire Mitigation Plan (WMP) Planning Cycle Guidelines

This document is the Oregon Public Utility Commission's (OPUC or Commission) Planning Cycle Guidelines for electric utilities required to submit Wildfire Mitigation Plans (WMP) to the Commission. These guidelines set forth information pertaining to the WMP planning cycle and describes the type of plans required each year. Each utility must make a Wildfire Mitigation Plan (WMP) filing annually as required by ORS 757.963 and OAR 860-300-0020(2). Permissible WMP filings include Multi-year WMPs or WMP Updates.

1. Three-Year Planning Cycle

WMPs should be submitted in alignment with a three-year, forward-looking, planning cycle. As demonstrated in Figure 1, a utility will submit either a Multi-year WMP or a WMP Update each year.

Figure 1: WMP Planning Cycle

2. Types of Wildfire Mitigation Plans

Multi-year WMPs are submitted every three years and must include the utility's planned wildfire mitigation activities for, at minimum, the next three calendar years. The first Multi-year WMP will be submitted by December 31, 2025, for the 2026-2028 planning period, as shown in Figure 1. Subsequent Multi-year WMPs should be filed every three years thereafter, or on an alternative date designated by Commission order.

In any year when a Multi-year WMP is not required, each utility must submit a WMP Update. A WMP Update serves as a mechanism to update the Commission on progress and changes to the most recent Multi-year WMP or WMP Update.

WMP Update Guidelines

This guideline provides requirements for the contents of a WMP Update. A WMP Update is required in years when a Multi-year WMP is not filed. The goal of a WMP Update is to update the Commission on changes made since the Commission's decision on the utility's Multi-year WMP and report progress towards implementing Areas for Additional Improvement. A utility must include all significant changes to key plan elements which, described in detail below, in a WMP Update.

1. Update Contents & Submission Schedule

A WMP Update must contain the following:

- WMP Regulatory Compliance Index;
- Significant changes to key plan elements from updates to the previous WMP filing or applicable Multi-year WMP;
- Steps taken towards implementation of Areas for Additional Improvement;[1] and
- Additional contents required by the Commission.

A WMP Update may contain the following at the utility's discretion:

- Introduction to the WMP Update which may include an executive summary, background, or regulatory context;
- Programmatic sharing which may include additional information the utility wishes to provide about its wildfire mitigation efforts not otherwise required in the WMP Update;
- Lists of Tables and/or list of Figures contained in the WMP Update;
- List of Acronyms used in the WMP Update; and
- Appendixes which provide additional information supporting the WMP Update.

1.1 Contents if no updates are required

If there are no significant changes to the key plan elements or if there are no additional contents required by the Commission, the WMP Update must state this explicitly.

1.2 WMP Data Submission Schedule

A fully complete WMP includes both the Plan as well as the supporting data that results in the documented plan. Below is the proposed timeframe for each of the elements. Due to the need for Plans to be filed by December 31, according to legislation, fourth quarter details are augmented into an initial filed dataset. For example, shown below is the schedule for the 2025 WMP Update.

[1] Areas for Additional Improvement refers to Staff or Independent Evaluator (IE) recommendations which were adopted by the Commission as part of WMP approval, discussed in Section 4.6 below.

Table 1: Submission Element Description Deadline

Submission Element	Description	Deadline
2025 WMP Update	WMP Written Plan	December 31, 2024
2025 WMP Data Template Workbook Initial Filing	Including data through Q3 2024	December 31, 2024
2025 WMP Data Template Workbook Final Filing	Updating data through Q3 2024 and appending Q4 2024	March 31, 2025

2. WMP Regulatory Compliance Index

The goal of the WMP Regulatory Compliance Index is to allow stakeholders and Staff to quickly identify where current information is located for each WMP requirement articulated in the OAR. Since the transition to a multi-year wildfire mitigation planning cycle creates the potential for the most up to date information about a utility's mitigation to be split between a Multi-year WMP and WMP Update, it is necessary to identify where compliance information is located. A WMP Update must contain a table with the following fields:

- OAR Rule Citation: The compliance index should contain all administrative rules applicable to the contents of a WMP.
- Document: The document field should reference the applicable year and type of filing (Ex. 2026-2028 Multi-Year WMP or 2027 WMP Update).
- Location: Page Number(s)/Document Section(s).

An exemplary portion of the Regulatory Compliance Index is provided for reference. The WMP Update should contain a similar table with all administrative rules applicable to the WMP.

Figure 1: Example WMP Regulatory Compliance Excerpt

Rule Citation (OAR)	Document	Location
860-024-0018(1)	2026-2028 Multi-Year WMP	p. 10-15
860-300-0030	2027 WMP Update	p. 7
860-300-0040(1)	2028 WMP Update	p. 22
860-300-0040(1)(a)	2026-2028 Multi-Year WMP	p. 80-92
860-300-0040(1)(A)	2028 WMP Update	p. 30
860-300-0050	2026-2028 Multi-Year WMP	p. 100-119
860-300-0060	2027 WMP Update	p. 19

3. Significant Updates to Key Plan Elements

3.1 Key Plan Elements

A WMP Update should address significant changes to the Multi-year WMP or prior filing that occurs in any key plan elements. For example, a 2028 WMP Update should include any significant changes from the 2026-2028 Multi-Year WMP and/or any significant changes from

the 2027 WMP Update. Significant changes to any of the following key plan elements must be included in the WMP Update:

- Risk Models;
- New or Discontinued Initiatives; and
- Approved Targets, Objectives, or Expenditures.

3.2 Risk Model

3.2.1 Threshold for Significant Risk Model Updates

The following changes to a risk model are significant:

- Where a utility has ranked the ignition risk of circuits, segments, or spans, any change or combination of changes to a risk model that moves ten percent or more of ignition risk into or out of the top ignition risk circuits, segments, or spans.
- Introduction of a new model.
- Discontinuation of an existing model.
- Any change in existing model application or use-case. For example, newly applying an existing vegetation risk model to PSPS decision-making.
- Introduction of new data types. For example, incorporating additional risk drivers into newer versions of a model.
- Changes to data sources. For example, using a new source of data to measure vegetation moisture content.
- Changes to third-party vendors for risk modeling or inputs to risk modeling

3.2.2 Content Required for Significant Update

Where a change to a risk model is significant, a utility must provide the following:

- Discussion of the updated methodology and/or models: This should include a narrative discussion of the change and any additional information necessary to understand the changes made (data, diagrams, tables, etc.). This should include a comparison of the updated model with the prior risk model.
- Justification for the update: This should include a narrative discussion along with any quantitative data supporting the change.
- Show how risk has shifted as a result of the update: This should include a narrative discussion of and any additional information necessary for complete understanding of the results (data, diagrams, tables, etc.). This discussion should include a summary comparison of assets categorized by risk level using the updated model versus prior risk model—does the updated model elevate the risk level of any assets?
- Resulting changes to mitigation initiatives: This should include a narrative description which addresses, at minimum, any changes in prioritization of mitigation initiatives, scheduling, or workplans resulting from the change.

The required information should be provided for each significant change to a risk model. For example, if a utility made significant changes to a model that calculated asset risk and a second model that calculates consequence of ignition, the WMP Update would need to include the required risk model update information for each of the two risk model changes.

3.3 New or Discontinued Initiatives

Any change which establishes a new initiative or discontinues an initiative is significant and must be reported in a WMP update.[2] The utility must report on the creation of a new program, or the discontinuance of a program described in its most recently approved Multi-year WMP. Each change must be justified by lessons learned, internal policy changes, new laws or regulations, or other explanations for the change.

3.4 Initiative Updates

For each initiative update the electric company should detail the targets, objectives, and expenditures for which the utility is proposing a significant update. The below subsection provides details regarding the specific significant qualifications required for reporting any initiative updates.

3.4.1 Thresholds for Significant Initiative Updates

- Target: For large volume work (equal to or greater than 100 units), changes of ten percent or greater to a WMP Update reporting period target from the most recently approved Multi-year WMP constitute a significant change and must be reported. For small volume work (less than 100 units), changes of 20 percent or greater to a WMP Update reporting period target from the approved Multi-year WMP constitute a significant change and must be reported.
- Objective: Any changes to forecasted initiative objective which shifts the completion dates in its most recently approved Multi-year WMP into the next calendar year constitute a significant change and must be reported. For example, if undergrounding of lines was forecasted to be completed by September 2027, in the most recently approved Multi-year WMP and is now forecasted completion date is changed to March 2028, then the change must be included in the WMP Update.
- Expenditures: Significant changes to expenditures include any change to project expenditures in the most recently approved Multi-year plan which constitute a change of at least 20 percent in an initiative's planned total expenditure during the reporting period. For example, if in the most recently approved Multi-year WMP an initiative's expenditures for the 2027 period were forecasted as $100 and the utility now forecasts spending $121 on the initiative in 2027 then the change in expenditure would be significant and need to be included in the WMP Update. As an alternative, should the initiative's expenditures be forecast at $79, then the change in expenditure would be significant and need to be included in the WMP Update.

3.4.2 Content Required for Significant Initiative Updates

Where a utility makes a significant change from its most recently approved WMP filing or applicable Multi-year WMP to targets, objectives, or expenditures it must report such changes in a WMP update. Each change must be justified by lessons learned, internal policy changes, new laws or regulations, or other explanations for the change. Justifications should be provided in narrative form and include any other information necessary (data, diagrams, tables, etc.) for complete understanding of the update.

4. Areas for Additional Improvement

A WMP Update must report on implementation or progress required by the Commission through adoption of Staff recommendations, collectively referred to as Areas for Additional Improvement.

[2] An initiative is defined as wildfire mitigation project, pilot, or program.

The WMP Update must provide narrative responses to each Area for Additional Improvement which requests reporting in the year associated with the WMP Update.

- Areas for Additional Improvement/Recommendation: This should include a citation to the Area of Additional Improvement being discussed. This citation should include the order number as well as the recommendation number. For example, Idaho Power's citation to Staff's second recommendation adopted in Order 24-231 might look like "24-231_2".
- Requirements: This is the work or information being required in the Area for Improvement or recommendation. The utility may use the verbatim text of the recommendation to meet this requirement. For example, the requirements of Staff's second recommendation for Idaho Power adopted in Order 24-231 might read "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)."
- The utility's response: This should include a narrative description of the utility's response including any additional information necessary to understand that response (data, diagrams, tables, etc.). To the extent that additional work was necessary to determine the appropriate response, a utility should describe what steps were performed, including any workshops, or external coordination.

5. Other Contents Required by the Commission

The Commission may, at its own discretion, require changes to the contents in a WMP Update, which could include reductions or additions. For example, 2025 WMP Updates will also include completion of data templates.[3]

6. WMP Update Format

This section provides an example of a table of contents and headings which meet the requirements in Section 2.1.2 and Section 4.1.[4] The example and includes optional WMP Update contents and assume the existence of significant updates across all key plan elements. This section does not address the substantive contents of WMP Updates.

Table of Contents Example for a WMP Update

Table of Contents....1
List of Figures....2
List of Tables....3
Acronyms....4
Introduction....5
Wildfire Mitigation Plan Compliance Index....6
Significant Risk Model Updates....7

[3] "[T]he 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 2026 or future plans."
[4] **Bold** text indicates a required section of the WMP Update. Text in blue is provided for illustrative purposes only.

Model Update 1 8
Model Update 2 9
New or Discontinued Initiatives 10
New Initiative 1 11
New Initiative 2 12
Discontinued Initiative 1 13
Existing Initiative Updates 14
Existing Initiative 1 15
Target Update 16
Objective Update 17
Expenditure Update 17
Existing Initiative 2 18
Objective Update 19
Existing Initiative 3 20
Target Update 21
Expenditure Update 22
Areas for Additional Improvement 24
Additional Requirements 25
Program Sharing 25
Appendix A –Additional information supporting WMP Update 26

Wildfire Mitigation Plan (WMP) - Data Template Guidelines

This document is the Oregon Public Utility Commission's (OPUC or Commission) Data Guidelines for electric utilities submitting the WMP Data Template Workbook. This includes tabular wildfire mitigation data to support the OPUC review of compliance with ORS 757.963 and OAR 860-300-0020(2).

These guidelines set forth the required standards, schemas, and schedule for the submission of WMP Data Template workbook. The Commission will provide a WMP Data Template Workbook. The WMP Template Data Workbook will be provided to each electric utility, and new template workbooks will be made available if future changes to these guidelines are made.

1.1 Submission Schedule

The WMP Data Template Workbook shall be submitted on December 31 and March 31 each year. The December 31 submission shall contain data for the first three quarters (January through September) of the reporting period year. The March 31 submission shall include fourth quarter (October through December) results for the reporting year period. For example, the December 31, 2025, WMP Data Template Workbook shall include data from January 1, 2024 through September 30, 2024, and the subsequent filing on March 31, 2025, shall include any Q1–Q3 2024 updates and Q4 2024 results. Data submissions include data for events which occurred during the reporting period and data for all assets in place by the end of the reporting period. Table 1 outlines the WMP Data Template Workbook tables and reporting schedule.

Table 1. WMP Data Template Workbook Worksheet Submission Schedule Details

Worksheet	December 31 Submission of Q1-Q3, (field requirements)	March 31 Submission of Q4, (field requirements)
Cover Sheet	All fields	All fields
Table 1	All fields	Only if corrections
Table 2	All fields	All fields
Table 3	'Year' Q1-3	'Year' Q4 & Q1-3 corrections
Table 4	'Year' Q1-3	'Year' Q4 & Q1-3 corrections
Table 5	'Year' Q1-3	'Year' Q4 & Q1-3 corrections
Table 6	All fields	Only if corrections
Table 7	'Year' Q1-3	'Year' Q4 & Q1-3 corrections
Table 8	'Year' Q1-3	'Year' Q4 & Q1-3 corrections
Table 9	'Year' Q1-3	'Year' Q4 & Q1-3 corrections
Table 10	All fields	Only if corrections
Table 11	All fields	Only if corrections
Table 12	'Year' Q1-3	'Year' Q4 & Q1-3 corrections
Table 13	All fields	All fields

When submitting the WMP Data Template Workbook, the file name shall include the reporting period, utility abbreviation shown in Table 2, and the filing type (Q1-3 or All). For example, the WMP Data Template Workbook submitted by PacifiCorp in 2030, reporting data for 2029, could be named *"2029_PAC_DataWorkbook_Q1-3"* or *"2029_PAC_DataWorkbook_All"*.

Table 2. Electric Utility Abbreviations

Electric Company	WMP Abbreviation
PacifiCorp	PAC
Portland General Electric	PGE
Idaho Power Company	IPC

1.1.1 Designation of Confidential Information

An electric company may request a confidential designation consistent with Ch. 860 Division 1 of the Oregon Administrative Rules. Any confidential information should be identified, at the same time the data is submitted. Designation of confidential information should clearly designate the cells, files, or schema containing confidential information. A designation of confidentiality should be provided at the most granular level possible. In other words, an electric company should not broadly designate a worksheet as confidential if only portions of the worksheet meet the requirements of Division 1.

1.2 Errata, Revisions, and Versions

If revision of a WMP Data Workbook submission is needed, an electric company shall incorporate the revisions into its WMP Data Workbook and resubmit the worksheet(s) in their entirety with other fields unchanged.

When a data submission includes revisions to previously submitted data, the electric company must provide a cover letter containing the following information for each record being revised:

- Description
- Explanation for each revision

All data submissions, including errata or revisions, must comply with guidelines in effect when the submission is made.

2 WMP Data Template Workbook

2.1 Filling out the WMP Data Template Workbook

Within each worksheet, where appropriate, fields are either pre-populated or specific values identified. Please use these to guide your submittals.

Requirements for Data

The data submitted by an electric utility shall comply with each of the following requirements:

- Completeness: The electric utility shall report performance on each metric contained in each sheet of the WMP Data Template Workbook except where a section pertaining to a given table of the template specifies otherwise. Where the electric utility does not collect its own data on a given metric, the electric utility shall clearly identify the owner and dataset used to provide the response in the "Comments" column.
- Comparability: For fields where acceptable values are defined, an electric utility shall adhere to the acceptable values provided in these guidelines. Do not add any extraneous characters or white spaces.
- Empty: Filings must differentiate between data which are "zero," "missing," or "not applicable" as follows:
  - Zeros: Data that are zero must be filled out as "0"
  - Missing or Not Applicable: Data that are missing or not applicable must be provided as empty fields.
- Internal Consistency: The wildfire mitigation data submitted by the electric company should be internally consistent with any geospatial data submitted by the electric company.

OPUC may reject data submissions that do not comply with the above requirements or the required schema and direct an electric company to file corrected data or a resubmission

2.2 WMP Data Template Workbook Cover Sheet

The "Cover Sheet" is the first sheet in the WMP Data Template Workbook. This sheet provides an overall report overview and helps to outline the individual responses and HFRZ that are unique to each of the reporting utilities.

Please complete this page first as it provides the basis and electric utility specific details for completion of the following worksheets.

- Utility Name: Use the drop down to select the appropriate name for the electric utility submitting the data. *This field is incorporated into the subsequent workbooks.*
- Submission Date: The date the data was provided.
- Reporting period year: is defined as the actual period of time for the provided relevant data. For example, the 2030 WMP filing should include data for the 2029 reporting period year. In this example, all data should be accurate as of December 31, 2029, including any projections of future costs (this may also be called reporting year). *This field is incorporated into the subsequent worksheets.*
- Submission Type: is defined based on the time of the filing.
  - For filings meeting the December 31 deadline select "Initial" as the submission type.
  - For filings meeting the March 31 deadline select "Final" as the submission type.
- Reporting Year Risk Designation: This attribute is used by the reporting electric utility to identify distinction levels of Wildfire Risk for the given reporting period year. (For example, Yellow and Red Risk Zones, Tier 1 or Tier 2, or HFRZ). The data is prepopulated based on the Utility Name Selection. *This field is incorporated into the subsequent worksheets. For any electric utility that does not differentiate levels of HFRZ they should complete the second row as N/A.*
- Other Risk Category: Risk category used by some utilities to define an area that is not identified as a HFRZ; however, the electric utility has deemed the area with some fire risk potential beyond the Non-HFRZ classification. These areas may signify areas in

which the electric utility feels it is necessary to provide some wildfire mitigation work or areas potentially not yet designated as HFRZ (i.e., areas of interest). Denote the method by which the electric utility is recognizing changing risk areas.

- Geographic Designation ID: PUC auto-created reference ID for the specific geographic area.
- Geographic Designation Name: Electric utility geographic Designated Areas represent geographical subareas which the electric utility identifies as having a level of fire risk above non-HFRZ (including areas of interest). The geographical areas are often contained within a single boundary/polygon or a localized grouping of areas. These areas may highlight specific area mitigation projects based on risk analysis for the given location. Examples of previous Geographical Designated Areas provided in electric utility filed WMPs include Idaho Power Company's (Austin Junction, OR, or Halfway, OR), PacifiCorp's (Hood River, Roseburg), Portland General Electric's (Zone1 or Zone 5). *This field is incorporated into the subsequent worksheet Table 1.*
- Fire Season Start Date: Electric utility specified reporting period date of fire season start for the geographic designated area.
- Fire Season End Date: Electric utility specified reporting period date of fire season end for the geographic designated area.

2.3 Substantive WMP Data Workbook Tables

2.3.1 Table 1: System Overview

The "System Overview" is used to provide a summary or snapshot of the system assets for the reporting period, distinguished by the type of wildfire risk level identified by the electric utility. The table is broken into the Metric Type/Asset with the Units column defining the value of measurement. Please refer to WMP Glossary for additional terminology details.

The total of all the values in the Non-HFRZ and each of the subsequent HFRZ ID should be equivalent to the Electric utility's System totals for the State of Oregon.

Field Name	Field Description	Field Value Constraints
Geographic_Designation_ID *(pre-populated with utility defined inputs from cover sheet)*	Auto-created reference ID for the specific geographic area sourced from cover sheet.	Numeric ≥ 1
Metric_Type *(predefined)*	A brief description of the Metric Type: - Primary UG Distribution Lines - Primary OH Distribution Lines - Secondary Distribution Lines - OH Transmission Lines - UG Transmission Lines - Transmission Substation - Distribution Substation - Connected Device (controllable device) - Connected Device (non-controllable device) - CFCI (sensory) - Fuse - Nonexplosion Fuse - Lightning Arrester - Support Structure/pole	Restricted to values indicated in Field Description.

Field Name	Field Description	Field Value Constraints
	- Tree Attached Equipment - Switchgear - Transformer - Camera - Weather Station - Customer/Meters - Commercial Customers - Total Acres - Planned Outages - Unplanned Outages Note: Transmission lines refer to all lines at or above 65kV, and distribution lines refer to all lines below 65kV.	
Geographic_Designation_Name *(pre-populated with utility defined inputs from cover sheet)*	Electric utility defined localized geographic designated subarea which represents the utility identifies as having a level of fire risk above non-HFRZ (including areas of interest).	Text
Reporting Year Risk Designation *(pre-populated with utility defined inputs from cover sheet)*	HFRZ areas and relevant sub-categories, if applicable, as defined by the electric utility on the cover sheet.	Restricted to values indicated in Field Description.
Unit(s) *(pre-defined)*	Predefined unit measurements for reporting period metric type.	Restricted to values indicated in Field Description.
'Year' *(utility provided results for the reporting period identified on cover sheet)*	Electric utility provided values for the indicated metric based on the pre-defined units for the reporting period year.	Numeric ≥ 0, or blank
Comments *(utility provided)*	Electric utility provided additional/other comments, if needed.	Text

2.3.2 Table 2: Initiative Data

Table 2 summarizes the electric utilities current WMP initiatives (which shall be described in detail in the annual WMP written report). The inputs into table 2 shall summarize the detailed WMP report initiatives providing an overview of the electric utility's goals, objectives, targeted risk reduction, alignment with the OPUC's initiative categories and activities, current status, and the expected units and spend for the reporting year. The table is not meant to be source for detailed initiative information but rather a summarized review of initiatives. Table 2 also acts as a complement to Table 13 creating an associated relationship of the electrical utilities' internal projects and initiatives to the OPUC initiative categories and activities provided in section 3.2. Each initiative activity shall be provided as a record with the following fields:

Field Name	Field Description	Field Value Constraints
UtilityID *(pre-populated with utility defined inputs from cover sheet)*	Standardized ID of the electrical utility; values are as follows: - Idaho Power - PacifiCorp - Portland General Electric	Restricted to values indicated in Field Description
Reporting_Period_Year *(utility provided)*	Date of submittal of the plan formatted as YYYY.	Date
Initiative_Classification *(pre-defined dropdown)*	- Program - an ongoing, function or operation (e.g., detailed asset inspections) - Project - a temporary endeavor undertaken to create a unique product, service, or result with a start and end date. (e.g., installing a microgrid, undergrounding a circuit segment, etc.) - Pilot - typically limited in scope, experimental, and exploratory studies of new equipment, technology, etc. for consideration of broader deployment	Restricted to values indicated in Field Description
Start_Date *(utility provided)*	Start date for initiative	Date
End_Date *(utility provided)*	Estimated end date for initiative	Date
Utility_Initiative_Name *(utility provided)*	Electric utility name for the initiative.	Text
Initiative_Description *(utility provided)*	A brief description of the initiative. Note a more detailed description of the initiative shall be provided in the written WMP filing. Use the "WMP_Page_Number" field described below to provide a report reference to location of the detailed initiative	Text
Initiative_Objective *(utility provided)*	A brief statement of the initiative activity intent (e.g., what does the electric utility plan to accomplish with this initiative).	Text
WMP_Initiative_Category *(pre-defined dropdown)*	The WMP Initiative Category under which the subject WMP Initiative Activity is organized. An overview of Initiative Categories is found in section 3.2.	Restricted to values indicated in Field Description.
WMP_Initiative_Activity *(pre-defined dropdown)*	The name of the subject WMP Initiative Category-Activity, as provided by OPUC. An overview of Initiative Category-Activities is found in section 3.2. If this value is "Other," provide the Initiative Activity name in the following column Activity_Name_if_Other.	Restricted to values indicated in Field Description.
Activity_Name_if_Other *(utility provided)*	If WMP_Initiative_Activity was "Other," provide the Initiative Activity name as it is referred to in the electrical utility's WMP.	Text
Utility_Initiative_Tracking_ID *(utility provided)*	The "Utility Initiative Tracking ID" is the unique tracking ID for a given initiative activity. This ID must match the "Utility Initiative Tracking ID" field for the same initiative activity in all data submissions for the initiative's entire lifecycle.	Text

Field Name	Field Description	Field Value Constraints
WMP_Page_Number *(utility provided)*	Page of most recent WMP where initiative is detailed. If the initiative is detailed on multiple pages, indicate the first page.	Integer
Risk_Target_Reduction *(pre-defined dropdown)*	Risk components targeted for reduction by implementing the initiative: - Equipment ignition likelihood - Contact from vegetation ignition likelihood - Contact by object ignition - Wildfire spread - Wildfire hazard - Wildfire exposure potential - Wildfire vulnerability - PSPS likelihood - PSPS exposure potential - PSPS vulnerability	Restricted to values indicated in Field Description.
Unit_Measurement *(pre-defined dropdown)*	Predefined unit measurements for reporting period metric type: - # of acres - # of assets - # of cameras - # of cameras (AI detection) - # of critical facilities - # of customers belonging to medically vulnerable populations - # of customers commercial - # of customers residential - # of customers total - # of days - # of events - # of hours - # of ignitions - # of incidents - # of linear miles - # of meetings - # of meters - # of minutes - # of outages - # of risk events - # of structures - # of substations - # of weather stations - N/A - Other	Restricted to values indicated in Field Description.
'Year'_Actual_Units *(utility provided)*	Electric utility provided units for the indicated metric based on the pre-defined units for the reporting period year.	Numeric ≥ 0, or blank
'Year'_Actual_$ *(utility provided)*	Electric utility provided actual spend for the indicated metric based on the pre-defined units for the reporting period year.	Numeric ≥ 0, or blank

Field Name	Field Description	Field Value Constraints
Status *(pre-defined dropdown)*	Initiative activity status designations. Acceptable values are as follows: - Planned - In Progress - Completed - Delayed - Cancelled - Ongoing	Restricted to values indicated in Field Description.
Corrective_Actions_If_Delayed *(utility provided)*	If projected progress vs. actual progress indicates a delay in an electrical utility's implementation of its initiative activity, the electrical utility must detail corrective actions it is taking to address the delay.	Text

2.3.3 Table 3: Transmission and Distribution Inspections

Wildfire Mitigation Data Table 3 includes reporting on the electric utility's overall transmission and distribution asset inspection program. This information serves as a gauge for the reporting years inspected assets based on the asset location for the Plan_Year_Risk_Designation and any priority condition findings. Inspections are categorized based on the inspections type (including a category for any additional ignition prevention inspection programs), the inspection method, and inspection findings. The electric utility may use the comment field to define/align to its internal program name.

In the absence of certain data elements, Staff will work with the utilities should there be a need to create a "proxy" or approach for estimating requested data while the utility systems evolve to provide the specific data. Provide a brief note in the comments for each attribute explaining the current "proxy" approach and a timeframe for when specific data is planned to be completed. Detailed program evolution may be outlined in the WMP report filing.

Field Name	Field Description	Field Value Constraints
Metric_Type *(pre-defined)*	Overview categorization for input metric. Note this includes a count of any existing tree attachments which are required to be removed by 2027 (OAR 860-024-0018(2)). - Tree attachments - Grid condition asset inspections	Restricted to values indicated in Field Description.
Metric_Name *(pre-defined)*	A brief description of the metric based on the Metric_Type categorization. Possible Metric_Name include: - Number of tree attachments[1] - Number of circuit miles inspected - Number of assets inspected - Priority A findings[2] - Priority B findings[3]	Restricted to values indicated in Field Description.

[1] Tree attachments, OAR 860-024-0018(2).
[2] Immediate Hazard, Priority A, OAR 860-024-0012(1).
[3] Two Year Correction, Priority B, OAR 860-024-0012(2).

Field Name	Field Description	Field Value Constraints
	- Priority C findings[4] - Ignition prevention findings[5]	
Reporting Year Risk Designation *(pre-populated with utility defined inputs from cover sheet)*	HFRZ areas and relevant sub-categories, if applicable, as defined by the electric utility. Note if n/a and strikethrough it is a result of your utilities unique HFRZ designation being not applicable.	Restricted to values indicated in Field Description.
Line_Type *(pre-defined)*	Transmission or Distribution. Note: Transmission lines refer to all lines at or above 65kV, and distribution lines refer to all lines below 65kV	Restricted to values indicated in Field Description.
Inspection_Type *(pre-defined)*	Inspection Types - Patrol Inspections[6] - Detailed inspection[7] - Ignition Prevention Inspection[8] - Other Inspections (provide details in the comment field)	Restricted to values indicated in Field Description.
Inspection_Method *(pre-defined)*	Inspection Method - Drone - Aerial - LiDAR - Other (provide details in the comment field)	Restricted to values indicated in Field Description.
Unit(s) *(pre-defined)*	Predefined unit measurements for reporting period metric type. For asset points a single unit applies to the physical location of the asset and all equipment at the singular point (ex: a pole and all subsequent equipment on the pole should be identified as a single asset, and counted as one unit)	Restricted to values indicated in Field Description.
'Year'_Q1-3 *(utility provided results for the reporting period identified on cover sheet)*	Electric utility provided values for the indicated metric based on the pre-defined units for January through September of the reporting period year.	Numeric ≥ 0, or blank
'Year'_Q4 *(utility provided results for the reporting period identified on cover sheet)*	Electric utility provided values for the indicated metric based on the pre-defined units for October through December of the reporting period year.	Numeric ≥ 0, or blank
Comments *(utility provided)*	If Inspection_Type or Inspection_Method was "Other," provide details. Provide any additional/other comments, if needed.	Text

2.3.4 Table 4: Transmission and Distribution Correction

Wildfire Mitigation Data Table 4 correlates with the inspection results and findings provided in Table 3. The table similarly reflects fields in Table 3 but asks for correction results by priority rating.

[4] Deferral, Priority C, OAR 860-024-0012(3)(a).
[5] Ignition Prevention Finding, OAR 860-024-0018(5)(b), 180 days.
[6] Safety Patrol, OAR 860-024-0011(2)(c).
[7] Detail, OAR 860-024-0011(1)(B).
[8] HFRZ Ignition Prevention Inspection, OAR 860-240-0001, Ignition prevention OAR 860-024-0018(3)(a).

In the absence of certain data elements, Staff will work with the utilities should there be a need to create a "proxy" or approach for estimating requested data while the utility systems evolve to provide the specific data. Provide a brief note in the comments for each attribute explaining the current "proxy" approach and a timeframe for when specific data is planned to be completed. Detailed program evolution may be outlined in the WMP report filing.

Field Name	Field Description	Field Value Constraints
Metric_Type *(pre-defined)*	Overview categorization for input metric. Note this includes a count of pole replaced tree attachments (OAR 860-024-0018(2)) - Tree attachments - Grid condition asset inspections	Restricted to values indicated in Field Description.
Metric_Name *(pre-defined)*	A brief description of the metric based on the Metric_Type categorization. Possible Metric_Names include: - Number of pole replaced tree attachments[1] - Priority A findings[2] - Priority B findings[3] - Priority C findings[4] - Ignition prevention findings[5]	Restricted to values indicated in Field Description.
Reporting_Year_Risk_Designation *(pre-populated with utility defined inputs from cover sheet)*	HFRZ areas and relevant sub-categories, if applicable, as defined by the electric utility.	Restricted to values indicated in Field Description.
Line_Type *(pre-defined)*	Transmission or Distribution. Note: Transmission lines refer to all lines at or above 65kV, and distribution lines refer to all lines below 65kV	Restricted to values indicated in Field Description.
Inspection_Type *(pre-defined)*	Inspection Types - Patrol Inspections - Detailed Inspection - Ignition Prevention Inspection - Other Inspections (provide details in the comment field)	Restricted to values indicated in Field Description.
Inspection_Method *(pre-defined)*	Inspection Method - Drone - Aerial - LiDAR - Other (provide details in the comment field)	Restricted to values indicated in Field Description.
Unit(s) *(pre-defined)*	Predefined unit measurements for reporting period metric type. For asset points a single unit applies to the physical location of the asset and all equipment at the singular point (ex: a pole and all subsequent equipment on the pole should be identified as a single asset, and counted as one unit)	Restricted to values indicated in Field Description.
'Year'_Q1-3_Correction_of_'Year'_Inspection_Finding *(utility provided results for the reporting period)*	Electric utility provided values for the indicated metric based on the pre-defined units for January through September of the reporting period year. For example, in reporting year 2024, the number of corrections from January through September 2024, that were the result of a correction found in 2024.	Numeric ≥ 0, or blank
'Year'_Q1-3_Correction_of_'Year-1'_Inspection_Finding *(utility provided results for the*	Electric utility provided values for the indicated metric based on the pre-defined units for January through September the reporting period year. For	Numeric ≥ 0, or blank

Field Name	Field Description	Field Value Constraints
reporting period)	example, in reporting year 2024, the number of corrections from January through September 2024, that were the result of a correction found in 2023.	
'Year'_Q1-3_Correction_of_'Year-2'_Inspection_Finding *(utility provided results for the reporting period)*	Electric utility provided values for the indicated metric based on the pre-defined units for January through September the reporting period year. For example, in reporting year 2024, the number of corrections from January through September 2024, that were the result of a correction found in 2022.	Numeric ≥ 0, or blank
'Year'_Q1-3_Correction_of_'Year-3'_or_Prior_Finding *(utility provided results for the reporting period)*	Electric utility provided values for the indicated metric based on the pre-defined units for January through September the reporting period year. For example, in reporting year 2024, the number of corrections from January through September 2024, that were the result of a correction found in 2021 or more years prior.	Numeric ≥ 0, or blank
'Year'_Q4_Correction_of_'Year'_Inspection_Finding *(utility provided results for the reporting period)*	Electric utility provided values for the indicated metric based on the pre-defined units for October through December of the reporting period year. For example, in reporting year 2024, the number of corrections from October through December 2024, that were the result of a correction found in 2024.	Numeric ≥ 0, or blank
'Year'_Q4_Correction_of_'Year-1'_Inspection_Finding *(utility provided results for the reporting period)*	Electric utility provided values for the indicated metric based on the pre-defined units for October through December of the reporting period year. For example, in reporting year 2024, the number of corrections from October through December 2024, that were the result of a correction found in 2023.	Numeric ≥ 0, or blank
'Year'_Q4_Correction_of_'Year-2'_Inspection_Finding *(utility provided results for the reporting period)*	Electric utility provided values for the indicated metric based on the pre-defined units for October through December of the reporting period year. For example, in reporting year 2024, the number of corrections from October through December 2024, that were the result of a correction found in 2022.	Numeric ≥ 0, or blank
'Year'_Q4_Correction_of_'Year-3'_or_Prior_Finding *(utility provided results for the reporting period)*	Electric utility provided values for the indicated metric based on the pre-defined units for October through December of the reporting period year. For example, in reporting year 2024, the number of corrections from October through December 2024, that were the result of a correction found in 2021 or more years prior.	Numeric ≥ 0, or blank
Comments *(utility provided)*	If Inspection_Type or Inspection_Method was "Other," provide details. Provide any additional/other comments, if needed.	Text

2.3.5 Table 5: Vegetation Management

Wildfire Mitigation Data Table 5 includes vegetation management findings and results which took place in the relevant reporting year. This information summarizes vegetation program actions for the reporting year. Data fields break the inspections, findings, and corrections by Plan_Year_Risk_Designation.

In the absence of certain data elements, Staff will work with the utilities should there be a need to create a "proxy" or approach for estimating requested data while the utility systems evolve to provide the specific data. Provide a brief note in the comments for each attribute explaining the

current "proxy" approach and a timeframe for when specific data is planned to be completed. Detailed program evolution may be outlined in the WMP report filing.

Field Name	Field Description	Field Value Constraints
Metric_Type *(pre-defined)*	Overview categorization for input metric. - Vegetation inspection	Restricted to values indicated in Field Description.
Metric_Name *(pre-defined)*	A brief description of the metric based on the Metric_Type categorization. Possible Metric_Names include: - Number of tree inspections - Number of trees requiring trimming - Number of trees requiring removal - Number of completed tree trimming - Number of completed tree removals	Restricted to values indicated in Field Description.
Reporting_Year_Risk_Designation *(pre-populated with utility defined inputs from cover sheet)*	HFRZ areas and relevant sub-categories, if applicable, as defined by the electric utility. Note if n/a and strikethrough it is a result of your utilities unique HFRZ designation being not applicable.	Restricted to values indicated in Field Description.
Line_Type *(pre-defined)*	Transmission or Distribution. Note: Transmission lines refer to all lines at or above 65kV, and distribution lines refer to all lines below 65kV	Restricted to values indicated in Field Description.
Inspection_Type *(pre-defined)*	Inspection Types - Routine non-wildfire - Routine wildfire (i.e., AWRR) - Non-Routine	Restricted to values indicated in Field Description.
Inspection_Method *(pre-defined)*	Inspection Method - Satellite - Ground - LiDAR - Other (provide details in the comment field)	Restricted to values indicated in Field Description.
Unit(s) *(pre-defined)*	Predefined unit measurements for reporting period metric type. Note only provide details made in the reporting year.	Restricted to values indicated in Field Description.
'Year'_Q1-3 *(utility provided results for the reporting period identified on cover sheet)*	Electric utility provided values for the indicated metric based on the pre-defined units for January through September of the reporting period year.	Numeric ≥ 0, or blank
'Year'_Q4 *(utility provided results for the reporting period identified on cover sheet)*	Electric utility provided values for the indicated metric based on the pre-defined units for October through December of the reporting period year.	Numeric ≥ 0, or blank
Comments *(utility provided)*	If Inspection_Type or Inspection_Method was "Other," provide details. Provide any additional/other comments, if needed.	Text

2.3.6 Table 6: Performance Metrics

In Table 6, utilities report any additional internally tracked metrics beyond the request or regulated requirements which are not already requested in the wildfire mitigation template. This worksheet serves as a separate location for utilities to report on any other metrics independently

tracked by the electric utility. The record for each additional metric identified by the electric utility shall contain the following:

Field Name	Field Description	Field Value Constraints
Metric *(utility provided)*	Unique identifying electric utility name for the metric.	Text
Definition *(utility provided)*	Electric utility narrative description of the metric and its calculation.	Text
Purpose *(utility provided)*	Electric utility narrative description of how the metric relates to the overall goals of the electrical utility wildfire mitigation program.	Text
Assumptions made to connect metric to purpose *(utility provided)*	Electric utility narrative discussion of how the metric accomplishes its purpose.	Text
Third-party validation (if any) *(utility provided)*	Electric utility narrative discussion of independent validation of the metric.	Text
Unit(s) *(utility provided)*	Predefined unit measurements for reporting period metric type.	Text
'Year' *(utility provided results for the reporting period identified on cover sheet)*	Electric utility provided values for the indicated metric based on the pre-defined units for the reporting period year.	Numeric ≥ 0, or blank
Comments *(utility provided)*	Electric utility provided additional/other comments, if needed.	Text

2.3.7 Table 7: Risk Performance

Table 7 summarizes risk and performance metrics quarterly over the relative reporting period. The electric utilities shall provide information based on weather patterns significant to fire risk potential, such as: Red Flag Warning (RFW),[9] High Wind Warning (HWW),[9] and Fire Potential Index (FPI), which have thought to be conducive to ignition and fire spread. Table 7 seeks to isolate system risk events as a result of weather-related events and their occurrence across the non-identified and identified plan year risk designation areas. The table also summarizes system reliability metrics, including and excluding planned events. And finally, the table seeks customer inquiries and complaints for the relevant reporting period.

In the absence of certain data elements, Staff will work with the utilities should there be a need to create a "proxy" or approach for estimating requested data while the utility systems evolve to provide the specific data. Provide a brief note in the comments for each attribute explaining the current "proxy" approach and a timeframe for when specific data is planned to be completed. Detailed program evolution may be outlined in the WMP report filing.

[9] Red Flag Warning and High Wind Warning are defined by the National Weather Service; https://mesonet.agron.iastate.edu/request/gis/watchwarn.phtml.

Field Name	Field Description	Field Value Constraints
Metric_Type *(pre-defined)*	Overview categorization for input metric - Risk Events - Utility-related ignitions - Utility reported ignition events - Overhead circuit mile days - General Reliability Metrics	Restricted to values indicated in Field Description.
Metric_Name *(pre-defined)*	A brief description of the metric based on the Metric_Type categorization. Possible Metric_Names include: - Number of unplanned fault events (forced outages), including wires down, line slap/wire to wire contact, contacts with objects, events with evidence of heat generation, and other situation that have the potential to serves as an ignition source. - Number of wires down - Number of outage events not caused by contact with vegetation - Number of outage events caused by contact with vegetation - Number of ignitions - Number of ignitions reported for OAR 860-024-0050 on FM221[10] - Red Flag Warning Only overhead circuit mile days - High Wind Warning Only overhead circuit mile days - Red Flag Watch and High Wind Watch overhead circuit mile day - Fire Potential Index circuit mile days - Other circuit mile days *(note metric type used in the comment field)* - Number of forced outages on circuits or circuit segments with non-reclosing but not due to active utility work. - Customer hours of interruption due to forced outages on circuits or circuit segments with non-reclosing but not due to active utility work. - Total customer interruptions due to forced outages on circuits or circuit segments with non-reclosing but not due to active utility work. - Number of forced outages on circuits or circuit segments with non-reclosing due to active utility work. - Customer hours of interruption due to forced outages on circuits or circuit segments with non-reclosing due to active utility work. - Total customer interruptions due to forced outages on circuits or circuit segments with non-reclosing due to active utility work. - Number of forced outages on circuits or circuit segments with alternate settings for risk period but not due to active utility work. - Customer hours of interruption due to forced outages on circuits or circuit segments with alternate settings for risk period but not due to active utility work. - Total customer interruptions due to forced outages	Restricted to values indicated in Field Description.

[10] https://secure.sos.state.or.us/oard/viewSingleRule.action?ruleVrsnRsn=301148 and https://www.oregon.gov/puc/forms/Forms%20and%20Reports/Electric-Communication-Incident-Report-Form-FM221.pdf.

Field Name	Field Description	Field Value Constraints
	on circuits or circuit segments with alternate settings for risk period but not due to active utility work. - Number of forced outages on circuits or circuit segments with default settings in place. - Customer hours of interruption due to forced outages on circuits or circuit segments with default settings in place. - Total customer interruptions due to forced outages on circuits or circuit segments with default settings in place. - Number of planned outages on circuits or circuit segments not due to PSPS. - Customer hours of interruption due to planned outages on circuits or circuit segments not due to PSPS. - Total customer interruptions due to planned outages on circuits or circuit segments not due to PSPS. - Number of planned outages on circuits or circuit segments due to PSPS. - Customer hours of interruption due to planned outages on circuits or circuit segments due to PSPS. - Total customer interruptions due to planned outages on circuits or circuit segments due to PSPS. - System Average Interruption Duration Index (SAIDI) (no exclusions, including: PSPS, Planned, and Major Events). - System Average Interruption Frequency Index (SAIFI) (no exclusions, including: PSPS, Planned, and Major Events). - System Average Interruption Duration Index (SAIDI) (including PSPS and planned, excluding major events). - System Average Interruption Frequency Index (SAIFI) (including PSPS and planned, excluding major events). - System Average Interruption Duration Index (SAIDI) (includes planned, excluding major events and PSPS). - System Average Interruption Frequency Index (SAIFI) (includes planned, excluding major events and PSPS). - System Average Interruption Duration Index (SAIDI) (excludes major events, PSPS, and planned). - System Average Interruption Frequency Index (SAIFI) (excludes major events, PSPS, and planned). - Count of customer reliability inquiries. - Count of customer reliability complaints. - Count of customer OPUC recorded reliability complaints.	
Warning_Status *(pre-defined)*	Designation index of Red Flag Warning (RFW), High Wind Warning (HWW), and Fire Potential Index (FPI).	Restricted to values indicated in Field Description.

Field Name	Field Description	Field Value Constraints
Reporting_Year_Risk_Designation *(pre-populated with utility defined inputs from cover sheet)*	HFRZ areas and relevant sub-categories, if applicable, as defined by the electric utility. Note if n/a and strikethrough it is a result of your utilities unique HFRZ designation being not applicable.	Restricted to values indicated in Field Description.
Unit(s) *(pre-defined)*	Predefined unit measurements for reporting period metric type. - Number of events subject to Metric_Name - Number of hours subject to Metric_Name - Total number of customers subject to Metric_Name - Number of ignitions - Sum of overhead circuit miles of utility grid subject to Metric_Type, Metric_Name, and Wind_Warning_Status - Customer hours per year subject to Metric_Name - Duration (SAIDI) subject to Metric_Name - Frequency (SAIFI) subject to Metric_Name - Count of customer inquiries or complaints subject to Metric_Name	Restricted to values indicated in Field Description.
'Year'_Q1 *(utility provided results for Q1 of reporting period identified on cover sheet)*	Values for the indicated metric for the first quarter (January through March) of the reporting period year.	Numeric ≥ 0, or blank
'Year'_Q2 *(utility provided results for Q2 of reporting period identified on cover sheet)*	Values for the indicated metric for the second quarter (April through June) of the reporting period year.	Numeric ≥ 0, or blank
'Year'_Q3 *(utility provided results for Q3 of reporting period identified on cover sheet)*	Values for the indicated metric for the third quarter (July through September) of the reporting period year.	Numeric ≥ 0, or blank
'Year'_Q4 *(utility provided results for Q4 of reporting period identified on cover sheet)*	Values for the indicated metric for the fourth quarter (October through December) of the reporting period year.	Numeric ≥ 0, or blank
Comments *(utility provided)*	If Metric_Name is "Other circuit mile days" then provide a description of the other weather variable used in measuring weather related risk. Provide any additional/other comments, if needed.	Text

2.3.8 Table 8: Risk Event Drivers

Table 8 includes wire down and outage events that are not associated with an ignition. For the purposes of this table, wire down events are any wire down event that may or may not have caused an unplanned outage. Any involuntary/unplanned outage which did not result in a downed wire should be included in the "Unplanned Outage" portion of the Risk_Event_Category. All risk events should include major events and exclude ignition events. Section 3.1 contains a table for possible risk event categories, type, and drivers. Where applicable categories and subcategories were aligned to IEEE 1782-2022; where not available the individual category was retained as a valid entry.

In the absence of certain data elements, Staff will work with the utilities should there be a need to create a "proxy" or approach for estimating requested data while the utility systems evolve to

provide the specific data. Provide a brief note in the comments for each attribute explaining the current "proxy" approach and a timeframe for when specific data is planned to be completed. Detailed program evolution may be outlined in the WMP report filing.

Field Name	Field Description	Field Value Constraints
Risk_Event_Category *(pre-defined)*	Overview categorization of the adverse effects from a hazard considering the consequences and frequency of the hazard occurring for the input metric. Data is either considered a wire down event (which did not result in an unplanned outage but may have cause the electric utility to voluntarily de-energize) or an unplanned outage (an event in which asset protection system responded causing an unplanned outage) No ignition occurred. See section 3.1.	Restricted to values indicated in Field Description.
Risk_Event_Type *(pre-defined)*	Outage or event risk classification type for reporting outage category/type. See section 3.1.	Restricted to values indicated in Field Description.
Risk_Event_Driver *(pre-defined)*	Outage or event drivers classifications driver for reporting outage category/type/driver. See section 3.1.	Restricted to values indicated in Field Description.
Line_Type *(pre-defined)*	Transmission or Distribution. Note: Transmission lines refer to all lines at or above 65kV, and distribution lines refer to all lines below 65kV	Restricted to values indicated in Field Description.
Reporting_Year_Risk_Designation *(pre-populated with utility defined inputs from cover sheet)*	HFRZ areas and relevant sub-categories, if applicable, as defined by the electric utility. Note if n/a and strikethrough it is a result of your utilities unique HFRZ designation being not applicable.	Restricted to values indicated in Field Description.
Unit(s) *(pre-defined)*	Predefined unit measurements for reporting period risk drivers. Number of risk events.	Restricted to values indicated in Field Description.
'Year'_Q1 *(utility provided results for Q1 of reporting period identified on cover sheet)*	Number of risk events for the indicated metric for the first quarter (January through March) of the reporting period year. All risk events should include major events and exclude ignition events.	Numeric ≥ 0, or blank
'Year'_Q2 *(utility provided results for Q2 of reporting period identified on cover sheet)*	Number of risk events for the indicated metric for the second quarter (April through June) of the reporting period year. All risk events should include major events and exclude ignition events.	Numeric ≥ 0, or blank
'Year'_Q3 *(utility provided results for Q3 of reporting period identified on cover sheet)*	Number of risk events for the indicated metric for the third quarter (July through September) of the reporting period year. All risk events should include major events and exclude ignition events.	Numeric ≥ 0, or blank
'Year'_Q4 *(utility provided results for Q4 of reporting period identified on cover sheet)*	Number of risk events for the indicated metric for the fourth quarter (October through December) of the reporting period year. All risk events should include major events and exclude ignition events.	Numeric ≥ 0, or blank
Comments *(utility provided)*	Provide any additional/other comments, if needed.	Text

2.3.9 Table 9: Ignition Events

Table 9 contains ignition data focused on cause based on ignition event driver, event type, line type, and the utilities plan year risk designation. For the purposes of this table, ignition events

are to follow the same reporting requirements as OAR 860-024-0050(3)[11] and shall align with FM221 reports. Record events that caused a reportable ignition should not be included in the Table 8: Risk Event Drivers. Section 3.1 contains a table for ignition event types and drivers.

In the absence of certain data elements, Staff will work with the utilities should there be a need to create a "proxy" or approach for estimating requested data while the utility systems evolve to provide the specific data. Provide a brief note in the comments for each attribute explaining the current "proxy" approach and a timeframe for when specific data is planned to be completed. Detailed program evolution may be outlined in the WMP report filing.

Field Name	Field Description	Field Value Constraints
Ignition_Event_Type *(pre-defined)*	Ignition event cause type. See section 3.1.	Restricted to values indicated in Field Description.
Ignition_Event_Driver *(pre-defined)*	Ignition event type/driver. See section 3.1.	Restricted to values indicated in Field Description.
Line_Type *(pre-defined)*	Transmission or Distribution. Note: Transmission lines refer to all lines at or above 65kV, and distribution lines refer to all lines below 65kV.	Restricted to values indicated in Field Description.
Reporting_Year_Risk_Designation *(pre-populated with utility defined inputs from cover sheet)*	HFRZ areas and relevant sub-categories, if applicable, as defined by the electric utility. Note if n/a and strikethrough it is a result of your utilities unique HFRZ designation being not applicable.	Restricted to values indicated in Field Description.
Unit(s) *(pre-defined)*	Description of units used to measure and report risk metrics. Number of ignitions.	Restricted to values indicated in Field Description.
'Year'_Q1 *(utility provided results for Q1 of reporting period identified on cover sheet)*	Number of ignitions for the indicated metric for the first quarter (January through March) of the reporting period year.	Numeric ≥ 0, or blank
'Year'_Q2 *(utility provided results for Q2 of reporting period identified on cover sheet)*	Number of ignitions for the indicated metric for the second quarter (April through June) of the reporting period year.	Numeric ≥ 0, or blank
'Year'_Q3 *(utility provided results for Q3 of reporting period identified on cover sheet)*	Number of ignitions for the indicated metric for the third quarter (July through September) of the reporting period year.	Numeric ≥ 0, or blank
'Year'_Q4 *(utility provided results for Q4 of reporting period identified on cover sheet)*	Number of ignitions for the indicated metric for the fourth quarter (October through December) of the reporting period year.	Numeric ≥ 0, or blank
Comments *(utility provided)*	Provide any additional/other comments, if needed.	Text

[11] https://secure.sos.state.or.us/oard/viewSingleRule.action?ruleVrsnRsn=301148.

2.3.10 Table 10: Equipment Area Index

Table 10 breaks electric utility equipment and customer counts across the utilities Plan_Year_Risk_ Designation, Urban/Suburban/Rural,[12] and Wildland-urban interface (WUI) status.[13] Note that totals for the various Metric_Types shall all be aligned with totals provided in Table 1.

In the absence of certain data elements, Staff will work with the utilities should there be a need to create a "proxy" or approach for estimating requested data while the utility systems evolve to provide the specific data. Provide a brief note in the comments for each attribute explaining the current "proxy" approach and a timeframe for when specific data is planned to be completed. Detailed program evolution may be outlined in the WMP report filing.

Field Name	Field Description	Field Value Constraints
Metric_Type *(pre-defined)*	Overview categorization for input metric. - Overhead circuit miles - Underground circuit miles - Critical facilities - Residential customers - Commercial customers - Medical vulnerable customers - Substations - Weather stations - Cameras	Restricted to values indicated in Field Description.
Line_Type *(pre-defined)*	Transmission or Distribution. Note: Transmission lines refer to all lines at or above 65kV, and distribution lines refer to all lines below 65kV.	Restricted to values indicated in Field Description.
Reporting_Year_Risk_Designation *(pre-populated with utility defined inputs from cover sheet)*	HFRZ areas and relevant sub-categories, if applicable, as defined by the electric utility. Note if n/a and strikethrough it is a result of your utilities unique HFRZ designation being not applicable.	Restricted to values indicated in Field Description.
Area_Type *(pre-defined)*	Area type is based on System characterization[13] - Rural - Suburban - Urban	Restricted to values indicated in Field Description.
WUI_Status *(pre-defined)*	Wildland urban interface - WUI - Non-WUI	Restricted to values indicated in Field Description.
Unit(s) *(pre-defined)*	Predefined unit measurements for reporting period metric type. - Circuit miles - Number of Metric_Type	Restricted to values indicated in Field Description.

[12] Per IEEE 1782-2024 3.3 System characterization: Utility circuits (and systems) generally fall into one of the three categories below, which are defined by customer density:
a) Rural (less than 31 customers per circuit kilometer or 50 customers per circuit mile)
b) Suburban (31 to 93 customers per circuit kilometer or 50 to 150 customers per circuit mile)
c) Urban (more than 93 customers per circuit kilometer or 150 customers per circuit mile).

[13] WIU is the line, area, or zone where structures and other human development meet or intermingle with undeveloped wildland or vegetation fuels consistent with to OAR 629-044-1011. https://archive-osuwildfireriskmap.forestry.oregonstate.edu/wildland-urban-interface.

Field Name	Field Description	Field Value Constraints
'Year' *(utility provided results for the reporting period identified on cover sheet)*	Electric utility provided values for the indicated metric based on the pre-defined units for the reporting period year.	Numeric ≥ 0, or blank
Comments *(utility provided)*	Electric utility provided additional/other comments, if needed.	Text

2.3.11 Table 11: Equipment Area Index Changes

Table 11 identifies any additions, removals, or upgrades to electric utility equipment across the utilities Plan_Year_Risk_ Designation, Urban/Suburban/Rural,[13] and Wildland-urban interface (WUI) status.[14]

In the absence of certain data elements, Staff will work with the utilities should there be a need to create a "proxy" or approach for estimating requested data while the utility systems evolve to provide the specific data. Provide a brief note in the comments for each attribute explaining the current "proxy" approach and a timeframe for when specific data is planned to be completed. Detailed program evolution may be outlined in the WMP report filing.

Field Name	Field Description	Field Value Constraints
Metric_Type *(pre-defined)*	Overview categorization for input metric. - Overhead circuit miles - Underground circuit miles - Substations - Weather stations - Cameras	Restricted to values indicated in Field Description.
Line_Type *(pre-defined)*	Transmission or Distribution. Note: Transmission lines refer to all lines at or above 65kV, and distribution lines refer to all lines below 65kV.	Restricted to values indicated in Field Description.
Reporting_Year_Risk_Designation *(pre-populated with utility defined inputs from cover sheet)*	HFRZ areas and relevant sub-categories, if applicable, as defined by the electric utility. Note if n/a and strikethrough it is a result of your utilities unique HFRZ designation being not applicable.	Restricted to values indicated in Field Description.
Area_Type *(pre-defined)*	Area type is based on System characterization[13] - Rural - Suburban - Urban	Restricted to values indicated in Field Description.
WUI_Status *(pre-defined)*	Wildland urban interface - WUI - Non-WUI	Restricted to values indicated in Field Description.
Unit(s) *(pre-defined)*	Predefined unit measurements for reporting period metric type. - Circuit miles - Number of Metric_Type	Restricted to values indicated in Field Description.
'Year+1'_Additions *(utility provided results for the reporting period identified on cover sheet)*	Electric utility provided planned additions for the following reporting year based on Area_Type and WUI_Status for the indicated metric.	Numeric ≥ 0, or blank

Field Name	Field Description	Field Value Constraints
'Year+1'_Removals *(utility provided results for the reporting period identified on cover sheet)*	Electric utility provided planned removals for the following reporting year based on Area_Type and WUI_Status for the indicated metric.	Numeric ≥ 0, or blank
'Year+1'_Upgrades *(utility provided results for the reporting period identified on cover sheet)*	Electric utility provided Planned upgrades for the following reporting year based on Area_Type and WUI_Status for the indicated metric.	Numeric ≥ 0, or blank
Comments *(utility provided)*	Electric utility provided additional/other comments, if needed.	Text

2.3.12 Table 12: De-energization and PSPS Metrics

In Table 12, utilities shall report on specified De-energization and PSPS related metrics for the reporting year. These include unit metrics such as number outage events, affect circuit mile days, customer hours out and number of customers affected. Where overlap occurs the reported actuals shall align with previously submitted data unless corrections are needed due to errors identified in previous submissions.

In the absence of certain data elements, Staff will work with the utilities should there be a need to create a "proxy" or approach for estimating requested data while the utility systems evolve to provide the specific data. Provide a brief note in the comments for each attribute explaining the current "proxy" approach and a timeframe for when specific data is planned to be completed. Detailed program evolution may be outlined in the WMP report filing.

Field Name	Field Description	Field Value Constraints
Metric_Type *(pre-defined)*	Overview categorization for input metric. - Sensitive settings - Proximity utility encroachment de-energizations - Proximity dictated FS requested de-energization - Public safety power shutoff	Restricted to values indicated in Field Description.
Metric_Name *(pre-defined)*	A brief description of the metric based on the Metric_Type categorization. Possible Metric_Names: - Frequency of Metric_Type - Circuit mile days of Metric_Type - Scope of Metric_Type - Duration of Metric_Type - Customer experiencing of Metric_Type - SAIDI of Metric_Type - SAIFI of Metric_Type - CAIDI of Metric_Type - Critical Infrastructure impacted by PSPS	Restricted to values indicated in Field Description.
Wind_Warning_Status *(pre-defined)*	Designation index of - Red Flag Warning (RFW) - High Wind Warning (HWW) - RFW & HWW - All (regardless of RFW/HWW status) - N/A	Restricted to values indicated in Field Description.

Field Name	Field Description	Field Value Constraints
Reporting_Year_Risk_Designation *(pre-populated with utility defined inputs from cover sheet)*	HFRZ areas and relevant sub-categories, if applicable, as defined by the electric utility. Note if n/a and strikethrough it is a result of your utilities unique HFRZ designation being not applicable.	Restricted to values indicated in Field Description.
Unit(s) *(pre-defined)*	Predefined unit measurements for reporting period metric type. - Number of outages - Circuit mile days - Number of instances where utility operating protocol requires de-energization of a circuit or portion thereof to reduce ignition probability, per year; an event is one occurrence that can include multiple zones beginning at the same time and date - Circuit-events, measured in number of events multiplied by number of circuits de-energized per year; an event is one occurrence that can include multiple zones beginning at the same time - Customer hours per year (Customer count * Minutes out) - Total Customers experiencing Metric_Name - Minutes (SAIDI, CAIDI) - Frequency (SAIFI) - Number of critical infrastructure locations impacted per hour multiplied by hours offline per year	Restricted to values indicated in Field Description.
'Year'_Q1-3 *(utility provided results for the reporting period identified on cover sheet)*	Electric utility provided values for the indicated metric based on the pre-defined units for January through September of the reporting period year.	Numeric ≥ 0, or blank
'Year'_Q4 *(utility provided results for the reporting period identified on cover sheet)*	Electric utility provided values for the indicated metric based on the pre-defined units for October through December of the reporting period year.	Numeric ≥ 0, or blank
Comments *(utility provided)*	Provide any additional/other comments, if needed.	Text

2.3.13 Table 13: Mitigation Initiative Targets

In Table 13, the electric utility shall provide a summary of the actual and projected costs of initiative activities. For each initiative category and activity, the electric utility will report total units and expenditures by type, as either capital expenditure (Capital) or operations and maintenance expenditure (O & M). Results shall also be broken out by Plan_Year_Risk_Designation. In cases where indicated the OPUC is interested in only system cost for the initiative. Unit totals shall have an identified unit of measurement, while expenditure totals must be reported in thousands of dollars. Utilities shall provide previous year actuals, reporting year projection and actual, and projected targets for the reporting period of totals for units and spend. Details and programs identified in this table shall correlate and align to the electric utilities' initiative programs provided in Table 2. A Summary of mitigation categories and activities can be found in section 3.2.

Field Name	Field Description	Field Value Constraints
Initiative_Category *(pre-defined)*	The WMP Initiative Category under which the subject WMP Initiative Activity is organized. An overview of Initiative Categories is found in section 3.2.	Restricted to values indicated in Field Description.
WMP_Initiative_Activity *(pre-defined)*	The name of the subject WMP Initiative Activity, as provided by OPUC. An overview of Initiative Category-Activities is found in section 3.2. If this value is "Other," provide the Initiative Activity name in the Comments.	Restricted to values indicated in Field Description.
Expense_Type	Electric utility expenditure source/allocation. - Capital - O & M	Restricted to values indicated in Field Description.
Area_of_Application *(pre-populated with utility defined inputs from cover sheet and pre-defined dropdown)*	If blank, select 'System' or 'Oregon Allocated' (reference section 3.2 for applicable initiative category activities). If applicable initiative category activities are not blank align with the relevant HFRZ areas and/or sub-categories, as defined by the electric utility on the cover sheet. Note if n/a and strikethrough it is a result of your utilities unique HFRZ designation being not applicable.	Restricted to values indicated in Field Description.
Program_Provisioner *(pre-defined dropdown)*	Select from the dropdown options: - Contractor - Company - Both - Outsourced	Restricted to values indicated in Field Description.
Geographic_Designation_ID(s)-if_multiple_separate_by_semi-colon *(utility provided)*	Provide the Geographic Designations number as defined in the Cover Sheet of the workbook.	Text
Utility_Initiative_Tracking_ID *(utility provided)*	The "Utility Initiative Tracking ID" is the unique tracking ID for a given initiative activity. This ID must match the "Utility Initiative Tracking ID" field for the same initiative activity in all data submissions for the initiative's entire lifecycle and must link with Utility_Intiative_Tracking_ID in Table 2.	Text
Primary_Driver_Targeted *(pre-defined dropdown)*	Primary risk driver component / outcome metric which is expected to be impacted by the initiative activity. A summary of risk drivers can be found in section 3.1 Risk and Ignition Event Table.	Restricted to values indicated in Field Description.
Secondary_Driver_Targeted *(pre-defined dropdown)*	Secondary risk driver component / outcome metric which is expected to be impacted by the initiative activity. A summary of risk drivers can be found in section 3.1 Risk and Ignition Event Table.	Restricted to values indicated in Field Description.
Year_Intiated *(utility provided)*	Year Initiative program began.	Text (YYYY)
Funding_Source *(pre-defined dropdown)*	Programing funding source: - GRCAAC - Deferral/Amortization - Grant - Other cost recovery - Combined	Restricted to values indicated in Field Description.

Field Name	Field Description	Field Value Constraints
Funding_Source_Order,_Funder, _ Other *(utility provided)*	Provide funding source details -If authorized through Commission docket provide order -If not, provide funder name	Text
If_Proposed_Program(Y/N) *(pre-defined dropdown)*	Program proposal: - Y - N	Restricted to values indicated in Field Description.
Relevant_regulation(s)-if multiple_separate_by_semi-colon *(utility provided)*	Reference OARs related to initiative	Text
Current_Compliance_Status *(pre-defined dropdown)*	Electric utility assessment of in compliance/ exceeding compliance with regulations: - In - Exceeding - N/A	Restricted to values indicated in Field Description.
Non-disaggregated_Spend *(utility provided)*	If spend not disaggregated by initiative activity, note initiative category for the spend or mark general operations.	Text
Unit_Measurement *(pre-defined dropdown)*	Select from dropdown the applicable predefined unit measurements for reporting period. Based on previous tables. - # of acres - # of assets - # of cameras - # of cameras (AI detection) - # of critical facilities - # of customers belonging to medically vulnerable populations - # of customers commercial - # of customers residential - # of customers total - # of days - # of events - # of hours - # of ignitions - # of incidents - # of linear miles - # of meetings - # of meters - # of minutes - # of outages - # of risk events - # of structures - # of substations - # of weather stations - N/A - Other	Restricted to values indicated in Field Description.
'Year-1'_Actual_Units *(utility provided)*	Actual electric utility total completed units for the reporting period year -1.	Numeric ≥ 0, or blank
'Year-1'_Actual_$ *(utility provided)*	Actual electric utility total expenditure for the reporting period year - 1. Must be reported in thousands of dollars.	Numeric ≥ 0, or blank

Field Name	Field Description	Field Value Constraints
'Year'_Projected_Units *(utility provided)*	Electric utility projected units for the reporting period year.	Numeric ≥ 0, or blank
'Year'_Projected_$ *(utility provided)*	Electric utility projected expenditure for the reporting period year. Must be reported in thousands of dollars.	Numeric ≥ 0, or blank
'Year'_Actual_Units *(utility provided)*	Actual electric utility total completed units for the reporting period year.	Numeric ≥ 0, or blank
'Year'_Actual_$ *(utility provided)*	Actual electric utility total expenditure for the reporting period year. Must be reported in thousands of dollars.	Numeric ≥ 0, or blank
'Year'_Projected_Units_for_'Year +1' *(utility provided)*	Electric utility projected units for the reporting period year +1.	Numeric ≥ 0, or blank
'Year'_Projected_$_for_'Year+1' *(utility provided)*	Electric utility projected expenditure for the reporting period year +1. Must be reported in thousands of dollars.	Numeric ≥ 0, or blank
'Year'_Projected_Units_for_'Year +2' *(utility provided)*	Electric utility projected units for the reporting period year +2.	Numeric ≥ 0, or blank
'Year'_Projected_$_for_'Year+2' *(utility provided)*	Electric utility projected expenditure for the reporting period year + 2. Must be reported in thousands of dollars.	Numeric ≥ 0, or blank
'Year'_Projected_Units_for_Year +3' *(utility provided)*	Electric utility projected units for the reporting period year +3.	Numeric ≥ 0, or blank
'Year'_Projected_$_for_'Year+3' *(utility provided)*	Electric utility projected expenditure for the reporting period year +3. Must be reported in thousands of dollars.	Numeric ≥ 0, or blank
Comments *(utility provided)*	Provide any additional/other comments if needed. Comments must be added if WMP_Initiative_Category is "Other".	Text

3 Risk and Ignition Event Categorizations

3.1 Risk and Ignition Event Table

While there is overlap between risk (Table 8) and ignition (Table 9) event types, there are slight variations noted in the table below. The below table provides a reference guide for event categories and their risk or ignition type and driver classifications. Where applicable categories and subcategories aligned to IEEE 1782-2022; where not available the individual category was retained as a valid entry.

Risk Event Category	Risk / Ignition Event Type (Category)	Risk Event Driver (Subcategory)	Ignition Event Driver (Subcategory)
Wire Down Event or Unplanned Outage	Contamination	Contamination	Contamination
	Equipment	Degradation-Structural Elements Degradation-Line Element Degradation-Protective/Control Device Degradation-Voltage Control Degradation-Other Degradation-Unknown	Degradation-Structural Elements Degradation-Line Element Degradation-Protective/Control Device Degradation-Voltage Control Degradation-Other Degradation-Unknown
		Equipment Error-Structural Elements Equipment Error-Line Element Equipment Error-Protective/Control Device Equipment Error-Voltage Control Equipment Error-Other Equipment Error-Unknown	Equipment Error-Structural Elements Equipment Error-Line Element Equipment Error-Protective/Control Device Equipment Error-Voltage Control Equipment Error-Other Equipment Error-Unknown
		Environmental-Structural Elements Environmental-Line Element Environmental-Protective/Control Device Environmental-Voltage Control Environmental-Other Environmental-Unknown	Environmental-Structural Elements Environmental-Line Element Environmental-Protective/Control Device Environmental-Voltage Control Environmental-Other Environmental-Unknown
		Other-Structural Elements Other-Line Element Other-Protective/Control Device Other-Voltage Control Other-Other	Other-Structural Elements Other-Line Element Other-Protective/Control Device Other-Voltage Control Other-Other

Risk Event Category	Risk / Ignition Event Type (Category)	Risk Event Driver (Subcategory)	Ignition Event Driver (Subcategory)
		Other-Unknown	Other-Unknown
	Fire	Fire	n/a
	Lightning	Direct Strike Lightning	Direct Strike Lightning
	Public Contact	Dig-in Fire/Police Foreign Contact-3rd party contact Foreign Contact-Aircraft vehicle contact Foreign Contact-Balloon contact Foreign Contact-Land vehicle contact Foreign Contact-Vandalism/theft Other	Dig-in Fire/Police Foreign Contact-3rd party contact Foreign Contact-Aircraft vehicle contact Foreign Contact-Balloon contact Foreign Contact-Land vehicle contact Foreign Contact-Vandalism/theft Other
	Wildlife Contact	Mammal Bird Reptile/Amphibian Other/Unknown	Mammal Bird Reptile/Amphibian Other/Unknown
	Other	Utility Error/Other	Utility Error/Other
	Unknown	Unknown	Unknown
	Vegetation	Outside Clearance Zone Within Clearance Zone (right-of-way) Other	Outside Clearance Zone Within Clearance Zone (right-of-way) Other
	Wire-to-wire contact	Wire-to-wire contact	Wire-to-wire contact
Additional Unplanned Outage Categories	Customer request	Customer request	n/a
	Emergency repairs	Emergency repairs	n/a
	Government agency request	Government agency request	n/a

3.2 Mitigation Categories and Activities

The table below outlines various mitigation initiative categories and their subsequent initiative activities.

Initiative Category	Initiative Activity	Utility must select System/Oregon Allocated
Community Outreach and Public Awareness	• Best Practice sharing with other utilities	X
	• Collaboration on local wildfire mitigation planning	X
	• Engagement with access and functional needs populations or environmental justice communities	X
	• WMP engagement, outreach, and education awareness program	X
	• Community Outreach and Engagement-Performance monitoring	X
	• Community Outreach and Engagement-Other	X
PSPS / Emergency Preparedness	• Customer support in wildfire emergencies and PSPS	X
	• Protocol for de-energization preparedness plan or emergency preparedness plan	X
	• Public Safety Partner collaboration and coordination	X
	• Preparedness and planning for service restoration	X
	• PSPS & Public emergency communication strategy	X
	• Public safety portal	X
	• Battery Programs	X
	• Community Resource Centers	X
	• PSPS & Emergency Preparedness-Performance monitoring	X
	• PSPS & Emergency Preparedness-Other	X
Industry Engagement	• Participation in forums / sharing industry best practices or learnings	X
	• Research and analysis to maintain expertise on emerging technologies/ practices	X
Overview of the Service Territory	• Environmental compliance and permitting	X
	• Overview of the Service Territory-Performance monitoring	X
	• Overview of the Service Territory-Other	X
Risk Methodology and Assessment	• Risk Methodology and Assessment	X
	• Risk Methodology and Assessment-Performance monitoring	X
	• Risk Methodology and Assessment-Other	X
Wildfire Mitigation Strategy Development	• Wildfire Mitigation Strategy Development (project management and plan document development)	
	• Wildfire Mitigation Strategy Development-Performance monitoring	
	• Wildfire Mitigation Strategy Development-Other	
Grid Design and System Hardening	• Covered conductor installation (Tree Wire)	
	• Distribution pole replacements and reinforcements	
	• Emerging grid hardening technology installations and pilots	

Initiative Category	Initiative Activity	Utility must select System/Oregon Allocated
	• Installation of system automation equipment • Installation of system monitoring equipment (CFCI) • Microgrids • Other grid topology improvements to minimize risk of ignitions • Other grid topology improvements to mitigate or reduce PSPS events • Other technologies and systems not listed above • Quality assurance / quality control • Spacer Cable installation • Traditional overhead hardening • Transmission pole/tower replacements and reinforcements • Undergrounding of electric lines and/or equipment • Grid Design and System Hardening–Performance monitoring • Grid Design and System Hardening–Other	
Grid Operations and Protocols	• Equipment Settings to Reduce Wildfire Risk (Grid Ops) • Grid Response Procedures and Notifications (Grid Ops) • Other technologies and systems not listed above • Personnel Work Procedures and Training in Conditions of Elevated Fire Risk (Grid Ops) • Quality assurance / quality control • Grid Operations and Protocols—Performance monitoring • Grid Operations and Protocols–Other	
Inspect/Correct	• Asset Inspections • Asset Management and Inspection/Correction Enterprise Systems • Fire season safety patrols • Correction—Heightened Fire Risk • Correction—Imminent Danger • Correction—Occupant Violation • Correction—Other Div. 24 Correction • Heightened risk of fire ignition corrections • Ignition prevention inspection • Ignition prevention inspection—Occupant violation • Imminent danger corrections • Occupant violation correction • Removal or permanent de-energization of equipment • Quality control / performance monitoring • Inspect/Correct—Other	
	• Environmental monitoring systems • Fire potential index	

Initiative Category	Initiative Activity	Utility must select System/Oregon Allocated
Situational Awareness and Forecasting	• Grid monitoring systems • Ignition detection systems • Near-term Risk Modeling • Weather forecasting • Situational Awareness and Forecasting-Performance monitoring • Situational Awareness and Forecasting-Other	
Vegetation Management	• Clearance • Emergency response vegetation management • Fall-in mitigation • Fire-resilient right-of-ways • High-risk species • Pole clearing • Quality assurance / quality control • Substation defensible space • Vegetation Imagery (LiDAR, Satellite) • Vegetation Inspections • Vegetation management enterprise system • Wood and slash management • Vegetation Management—Performance monitoring • Vegetation Management—Other	
Other	• See "Activity_Name_if_Other" Column	

Appendix A: Definitions

Term	Definition
Asset (utility)	Electric lines, equipment, or supporting hardware.
Circuit miles	The total length in miles of separate transmission and/or distribution circuits, regardless of the number of conductors used per circuit (i.e., different phases).
Consequence	The adverse effects from an event, considering the hazard intensity, community exposure, and local vulnerability.
Contact by object ignition likelihood	The likelihood that a non-vegetative object (such as a balloon or vehicle) may contact utility-owned equipment and result in an ignition.
Contact by vegetation ignition likelihood	The likelihood that vegetation may contact utility-owned equipment and result in an ignition.
Contractor	Any individual in the temporary and/or indirect employ of the electrical utility whose limited hours and/or time-bound term of employment are not considered “full-time” for tax and/or any other purposes.

Term	Definition
Critical facilities and infrastructure	Facilities and infrastructure that are essential to public safety and that require additional assistance and advance planning to ensure resiliency during PSPS events. These include the following: Emergency services sector: · Police stations · Fire stations · Emergency operations centers · Public safety answering points (e.g., 9-1-1 emergency services) Government facilities sector: · Schools · Jails and prisons Health care and public health sector: · Public health departments · Medical facilities, including hospitals, skilled nursing facilities, nursing homes, blood banks, health care facilities, dialysis centers, and hospice facilities (excluding doctors' offices and other non-essential medical facilities) Energy sector: · Public and private utility facilities vital to maintaining or restoring normal service, including, but not limited to, interconnected publicly owned electrical utilities and electric cooperatives Water and wastewater systems sector: · Facilities associated with provision of drinking water or processing of wastewater, including facilities that pump, divert, transport, store, treat, and deliver water or wastewater Communications sector: · Communication carrier infrastructure, including selective routers, central offices, head ends, cellular switches, remote terminals, and cellular sites Chemical sector: · Facilities associated with manufacturing, maintaining, or distributing hazardous materials and chemicals Transportation sector: · Facilities associated with transportation for civilian and military purposes: automotive, rail, aviation, maritime, or major public transportation
Customer hours	Sum of customer minutes of interruption divided by 60 (e.g., of power outage).
Detailed inspection	Detailed inspections include, but are not limited to, visual checks, pole test and treat programs (only required for pole Owners), or practical tests of all facilities, to the extent required to identify violations of Commission Safety Rules. Where facilities are exposed to extraordinary conditions (including High Fires Risk Zones) or when an Operator has demonstrated a pattern of non-compliance with Commission Safety Rules, the Commission may require a shorter interval between inspections. OAR 860-024-0011(1)(A).
Distribution Line	Distribution lines refer to all lines below 65kV.
Electrical utility	Every corporation or person owning, controlling, operating, or managing any electric plant for compensation within Oregon. “Reporting Operator” means an Operator that serves 20 customers or more within Oregon.

Term	Definition
Emergency	Any incident, whether natural, technological, or human caused, that requires responsive action to protect life or property but does not result in serious disruption of the functioning of a community or society. (FEMA/UNDRR.)
Equipment ignition likelihood	The likelihood that utility-owned equipment will cause an ignition through either normal operation (such as arcing) or failure.
Exercise	An instrument to train for, assess, practice, and improve performance in prevention, protection, response, and recovery capabilities in a risk-free environment. (FEMA.)
Exposure	The presence of people, infrastructure, livelihoods, environmental services and resources, and other high-value assets in places that could be adversely affected by a hazard.
Fire	A sustained chemical reaction that occurs when fuel, oxygen, and heat come together in an exothermic reaction. A fire can go through several stages, including growth, fully developed, and decay. Ignition is the process of starting a fire, while fire is the sustained chemical reaction that occurs when fuel, oxygen, and heat join together.
Fire Potential Index (FPI)	Landscape scale index used as a proxy for assessing real-time risk of a wildfire under current and forecasted weather conditions.
Fire season	The time of year when wildfires are most likely for a given geographic region due to historical weather conditions, vegetative characteristics, and impacts of climate change. Each electrical corporation defines the fire season(s) across its service territory based on a recognized fire agency definition for the specific region(s).
Frequency	The anticipated number of occurrences of an event or hazard over time.
Frequent PSPS events	More than one PSPS event per calendar year per line circuit.
Geographical Designated Area (ID and Name)	Geographic Designated Areas represent geographical subareas which the utility identifies as having a level of fire risk above non-HFRZ (including areas of interest). The geographical areas are often contained within a single boundary/polygon or a localized grouping of areas. These areas may highlight specific area mitigation projects based on risk analysis for the given location. Examples of previous Geographical Designated Areas provided in utility filed WMPs include Idaho Power Company's (Austin Junction, OR, or Halfway, OR), PacifiCorp's (Hood River, Roseburg), Portland General Electric's (Zone 1, or Zone 5).
Goals	The electrical corporation's general intentions and ambitions.
Grid hardening	Actions (such as equipment upgrades, maintenance, and planning for more resilient infrastructure) taken in response to the risk of undesirable events (such as outages) or undesirable conditions of the electrical system to reduce or mitigate those events and conditions, informed by an assessment of the relevant risk drivers or factors.

Term	Definition
Grid topology	General design of an electric grid, whether looped or radial, with consequences for reliability and ability to support PSPS (e.g., ability to deliver electricity from an additional source).
Hazard	A condition, situation, or behavior that presents the potential for harm or damage to people, property, the environment, or other valued resources.
High Fire Risk Zone (HFRZ)	"High Fire Risk Zones" or “HFRZ” are geographic areas identified by Operators of electric facilities in their risk-based wildfire plans. Each IOU has it’s on naming convention for these areas. IPC= Tier 2 (YRZ) and Tier 3 (RRY), PAC=FHCA, PGE=HFRZ. OAR 860-024-0018.
HFRZ Ignition Prevention Inspection	An inspection that identifies potential sources of electrical ignition on any utility pole, structure, duct, or conduit owned by either the Owner or an Occupant in a High Fire Risk Zone. The inspection can be combined with other safety or detailed inspections as required by rule. OAR 860-024-0001.
High Wind Warning Only (HWW Only)	Used in the WMP Data Template Workbook to indicate that a High Wind Warning was the only wind status in effect at a given time and location.
High Wind Warning and Red Flag Warning (HWW & RFW)	Used in the WMP Data Template Workbook to indicate that a High Wind Warning and a Red Flag Warning were both in effect at a given time and location.
HFRZ- Sub-area	If the reporting utility has more than one subarea distinction for levels of Wildfire Risk. (For example, yellow and red risk zones, Tier 1 or Tier 2, or HFRZ and area of interest.)
HFRZ Zone ID	To identify specific utility defined HFRZ zones. Zones are typically HFRZ areas specific to a select geographic location. (For example, Oregon City, Medford, Halfway, Zone 1.)
High-risk species	Species of vegetation that (1) have a higher risk of either coming into contact with powerlines or causing an outage or ignition, or (2) are easily ignitable and within close proximity to potential arcing, sparks, and/or other utility equipment thermal failures. The status of species as “high-risk” must be a function of species-specific characteristics including growth rate, failure rates of limbs, trunk, and/or roots (as compared to other species), height at maturity, flammability, and vulnerability to disease or insects.
High Wind Warning (HWW)	Issued for the expectation of sustained wind of 40 to 57 mph or higher for ≥2 hours within a 12 hour period, or for any non-convective gust to 58 mph within a 12 hour period. This includes issuance for structural/natural damage from said winds. Generally issued within 12 to 24 hours of causative event.[14]

[14] https://www.weather.gov/bro/mapcolors#:~:text=HW.W,within%20a%2012%20hour%20period.

Term	Definition
HWW Only/Overhead (OH) circuit mile day	Used in the WMP Data Template Workbook to indicate that a High Wind Warning was the only wind status in effect at a given time and location. Sum of OH circuit miles of utility grid subject to a HWW each day within a given time period, calculated as the number of OH circuit miles under a HWW multiplied by the number of days those miles are under said HWW. For example, if 100 OH circuit miles are under a HWW for one day, and 10 of those miles are under the HWW for an additional day, then the total HWW OH circuit mile days would be 110.
Ignition	The process of starting combustion or catching fire. Ignition can be caused by an external heat source, such as a spark, pilot flame, or hot surface. The fuel and air must reach a certain temperature, known as the ignition temperature, for the combustion reaction to occur.
Ignition likelihood	The total anticipated annualized number of ignitions resulting from utility-owned assets at each location in the electrical utility's service territory. This considers probabilistic weather conditions, type and age of equipment, and potential contact of vegetation and other objects with utility assets.
Ignition prevention findings	A violation of Commission Safety Rules which poses a risk of fire ignition identified by an HFRZ Ignition Prevention Inspection or safety patrol in an HFRZ shall be subject to the following correction timeframes: (a) Any violation that poses imminent danger to life or property must be repaired, disconnected, or isolated by the Operator immediately after discovery. If in doing so, the Operator disconnected or isolated equipment belonging to a third-party, the Operator will notify the equipment Owner as soon as practicable, (b) Any violation which correlates to a heightened risk of fire ignition shall be corrected no later than 180 days after discovery unless an occupant receives notification under OAR 860-028-0120(6) that the violation must be corrected in less than 180 days to alleviate a significant safety risk to any operator's employees or a potential risk to the general public. When an inspection or safety patrol in an HRFZ poses imminent danger to life or property it must be repaired, disconnected, or isolated by the Operator immediately after discovery. If in doing so, the Operator disconnected or isolated equipment belonging to a third-party, the Operator will notify the equipment Owner as soon as practicable. OAR 860-024-0018(5)(b).
Ignition probability	The relative possibility that an ignition will occur, quantified as a number between zero percent (impossibility) and 100 percent (certainty). The higher the probability of an event, the more certainty there is that the event will occur. (Often informally referred to as likelihood or chance.)
Ignition risk	The total anticipated annualized impacts from ignitions at a specific location. This considers the likelihood that an ignition will occur, the likelihood the ignition will transition into a wildfire, and the potential consequences—considering hazard intensity, exposure potential, and vulnerability—the wildfire will have on each community it reaches.
Initiative	Measure or activity, either proposed or in process, designed to reduce the consequences and/or probability of wildfire or PSPS.

Term	Definition
Tree Attachment	Utility supply conductors shall not be attached to trees and should only be attached to poles and structures designed to meet the strength and loading requirements of the National Electrical Safety Code. This section does not apply to customer-supplied equipment at the point of delivery. Compliance with this section must be achieved prior to December 31, 2027. OAR 860-240-0018(2).
Line miles	The number of miles of transmission and/or distribution conductors, including the parallel length of each phase and conductor segment.
Medically Vulnerable Customers	A medically vulnerable customer is a person who is critically dependent on electrically powered equipment. This includes but may not be limited to life protecting devices, assistive technologies to support independent living, and medical equipment of those who are particularly vulnerable due to advanced age or physical, sensory, intellectual, or mental health.
Mitigation	Activities to reduce the loss of life and property from natural and/or human-caused disasters by avoiding or lessening the impact of a disaster and providing value to the public by creating safer communities.
Non-HFRZ	An area that is not designated as a HFRZ.
Non-routine	Vegetation management removal or treatment programs conducted as non-cycle work, not generally associated with clearance compliance with OAR 860-024-0016.
Other Risk Category	Risk category used by some electric utilities to define an area that is not identified as a HFRZ; however, the utility has deemed the area with some fire risk beyond the Non-HFRZ classification. These areas may signify areas in which the utility feels it is necessary to provide some wildfire mitigation work.
Patrol inspection	An Operator of electric supply facilities or an Operator of communication facilities must: (a) Construct, operate, and maintain its facilities in compliance with the Commission Safety Rules; and (b) Conduct detailed inspections of its overhead facilities to identify violations of the Commission Safety Rules. OAR 860-024-0111(1).
Performance metric	A quantifiable measurement that is used by an electrical corporation to indicate the extent to which its WMP is driving performance outcomes.
Preparedness	A continuous cycle of planning, organizing, training, equipping, exercising, evaluating, and taking corrective action in an effort to ensure effective coordination during incident response. Within the NIMS, preparedness focuses on planning, procedures and protocols, training and exercises, personnel qualification and certification, and equipment certification.
Priority A findings	A violation of the Commission Safety Rules that poses an imminent danger to life or property must be repaired, disconnected, or isolated by the Operator immediately after discovery. Immediate Hazard, Priority A, OAR 860-024-0012(1).
Priority B findings	The Operator must correct violations of Commission Safety Rules no later than two years after discovery. Two Year Correction, Priority B,

Term	Definition
	OAR 860-024-0012(2).
Priority C findings	An Operator may elect to defer correction of violations of the Commission Safety Rules that pose little or no foreseeable risk of danger to life or property to correction during the next major work activity. (a) In no event shall a deferral under this section extend for more than ten years after discovery. Deferral, Priority C, OAR 860-024-0012(3)(a).
Property	Private and public property, buildings and structures, infrastructure, and other items of value that may be destroyed by wildfire, including both third-party property and utility assets.
Protective equipment and device settings	The electrical corporation's procedures for adjusting the sensitivity of grid elements to reduce wildfire risk, other than automatic reclosers (such as circuit breakers, switches, etc.) For example, "sensitive settings".
PSPS event	A proactive de-energization of a portion of a Public Utility's electrical network, based on the forecasting of and measurement of extreme wildfire weather conditions. The period from notification of the first public safety partner of a planned public safety PSPS to re-energization of the final customer.
PSPS likelihood	The likelihood of a PSPS being required by a utility given a probabilistic set of environmental conditions.
Red Flag Warning (RFW)	Issued for conditions conducive to rapid or explosive growth of any wildfire that develops. Normally issued within 24 hours of expected occurrence. Red Flag Warnings are not issued for the probability of wildfire to start.[15,16]
RFW Only/OH circuit mile day	Used in the WMP Data Template Workbook to indicate that a Red Flag Warning was the only wind status in effect at a given time and location. Sum of OH circuit miles of utility grid subject to RFW each day within a given time period, calculated as the number of OH circuit miles under RFW multiplied by the number of days those miles are under said RFW. For example, if 100 OH circuit miles are under RFW for one day, and 10 of those miles are under RFW for an additional day, then the total RFW OH circuit mile days would be 110.
Reportable Ignition	OAR 860-024-0050(4). Except as provided in section (6) of this rule, every reporting operator must, in addition to the notice given in sections (2) and (3) of this rule for an incident described in sections (2) and (3), report in writing to the Commission within 20 days of knowledge of the occurrence using Form 221 (FM221) available on the Commission's website. In the case of injuries to employees, a copy of the incident report form that is submitted to Oregon OSHA, Department of Consumer and Business Services, for reporting incident injuries, will normally suffice for a written report.

[15] https://www.weather.gov/bro/mapcolors#:~:text=HW.W,within%20a%2012%20hour%20period.
[16] IEM :: NWS Watches Warnings Advisories Download (iastate.edu).

Term	Definition
Reporting Period	"Reporting period" is defined as the actual period of time the data is relevant. For example, the 2030 WMP filing should include the reporting period year of 2029.
Reporting Year Risk Designation	This attribute is used by the reporting utility to identify distinction levels of Wildfire Risk for the given reporting period year. (For example, Yellow and Red Risk Zones, Tier 1 or Tier 2, or HFRZ and Areas of Interest.) HFRZ areas and relevant sub-categories, if applicable, as defined by the utility.
Risk	A measure of the anticipated adverse effects from a hazard considering the consequences and frequency of the hazard occurring.[17]
Risk component	A part of an electric corporation's risk analysis framework used to determine overall utility risk.
Risk event	An event with probability of ignition, such as wire down, contact with objects, line slap, event with evidence of heat generation, or other event that causes sparking or has the potential to cause ignition. The following all qualify as risk events: · Ignitions · Outages not caused by vegetation · Outages caused by vegetation · Wire-down events · Faults · Other events with potential to cause ignition
Routine non-wildfire	Vegetation management removal or treatment programs conducted as cycle work, generally associated with clearance compliance with OAR 860-024-0016.
Routine wildfire	Vegetation management removal or treatment programs conducted programmatically that are intended to mitigate vegetation risks that could result in wildfire and are generally in excess of that required for compliance with OAR 860-024-0016.
Rura	Per IEEE 1782-2024 3.3 System characterization: Utility circuits (and systems) generally fall into one of the three categories below, which are defined by customer density. Rural (less than 31 customers per circuit kilometer or 50 customers per circuit mile).
Slash	Branches or limbs less than four inches in diameter, and bark and split products debris left on the ground as a result of utility vegetation management.
Span	The space between adjacent supporting poles or structures on a circuit consisting of electric lines and equipment. "Span level" refers to asset-scale granularity.
Suburban	Per IEEE 1782-2024 3.3 System characterization: Utility circuits (and systems) generally fall into one of the three categories below, which are

[17] Adapted from D. Coppola, 2020, "Risk and Vulnerability," *Introduction to International Disaster Management*, 4th ed.

Term	Definition
	defined by customer density. Suburban (31 to 93 customers per circuit kilometer or 50 to 150 customers per circuit mile).
Target	A forward-looking, quantifiable measurement of work to which an electrical corporation commits to in its WMP. Electrical corporations will show progress toward completing targets in subsequent reports.
Transmission Line	Transmission lines refer to all lines at or above 65kV.
Tree inspection Routine	Vegetation management inspection programs conducted as cycle work, generally associated with clearance compliance with OAR 860-024-0016.
Tree inspection Non-Routine	Vegetation management inspection programs conducted as non-cycle work, not generally associated with clearance compliance with OAR 860-024-0016.
Urban	Per IEEE 1782-2024 3.3 System characterization: Utility circuits (and systems) generally fall into one of the three categories below, which are defined by customer density. Urban (more than 93 customers per circuit kilometer or 150 customers per circuit mile).
Utility-related ignition	See Reportable Ignition.
Vegetation management (VM)	Trimming and removal of trees and other vegetation at risk of contact with electric equipment. OAR 860-024-0016 and OAR 860-024-0017.
Vulnerability	The propensity or predisposition of a community to be adversely affected by a hazard, including the characteristics of a person, group, or service and their situation that influences their capacity to anticipate, cope with, resist, and recover from the adverse effects of a hazard.
Wildfire hazard	The combination of ignition risk and fire spread resulting in a wildfire consequence.
Wildfire mitigation strategy	Overview of the key mitigation initiatives at enterprise level and component level across the electrical corporation's service territory, including interim strategies where long-term mitigation initiatives have long implementation timelines. This includes a description of the enterprise-level monitoring and evaluation strategy for assessing overall effectiveness of the WMP.
Wildfire risk	See Ignition Risk.
Wildland-urban interface (WUI)	The line, area, or zone where structures and other human development meet or intermingle with undeveloped wildland or vegetation fuels (National Wildfire Coordinating Group). Enforcement agencies also designate the WUI as the area at significant risk from wildfires, established pursuant to Title 24, Part 2, Chapter 7A. https://archive-osuwildfireriskmap.forestry.oregonstate.edu/wildland-urban-interface.
Wire down	Instance where an electric transmission or distribution conductor is broken and falls from its intended position to rest on the ground or a foreign object.

Term	Definition
Work order	A prescription for asset or vegetation management activities resulting from asset or vegetation management inspection findings.

~~Phase 1 Updated Staff Proposal~~
~~Wildfire Mitigation Plan (WMP)~~
~~Process and Planning Cycle Guidelines~~

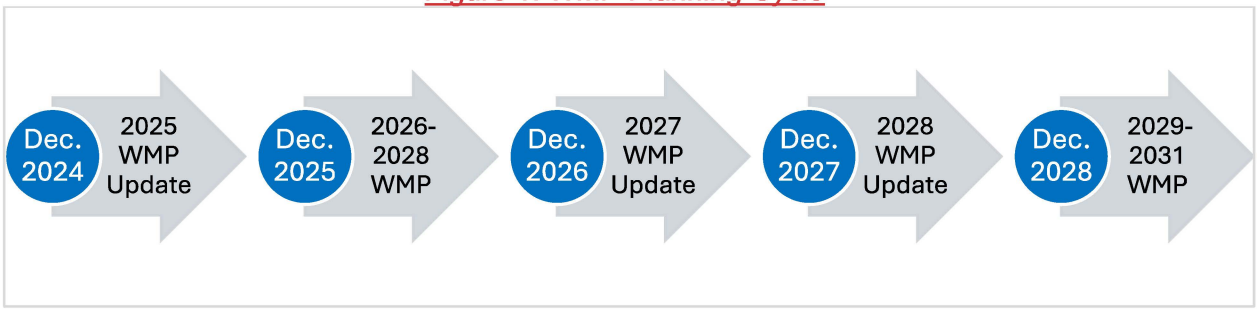
~~1.~~ Wildfire Mitigation Plan (WMP) Planning ~~Cycles~~Cycle Guidelines

This document is the Oregon Public Utility Commission's (OPUC or Commission) Planning Cycle Guidelines for electric utilities required to submit Wildfire Mitigation Plans (WMP) to the Commission. These guidelines set forth information pertaining to the WMP planning cycle and describes the type of plans required each year. Each utility must make a Wildfire Mitigation Plan (WMP) filing annually as required by ORS 757.963 and OAR 860-300-0020(2). Permissible WMP filings include Multi-year WMPs or WMP Updates.

1. Three-Year Planning Cycle

WMPs should be submitted in alignment with a three-year, forward-looking, planning cycle. ~~This cycle includes two types of Wildfire Mitigation Plans (WMP) a Multi-year WMPs and~~ As demonstrated in Figure 1, a utility will submit either a Multi-year WMP or a WMP Update~~.~~ each year.

Figure 1: WMP Planning Cycle



2. Types of Wildfire Mitigation Plans

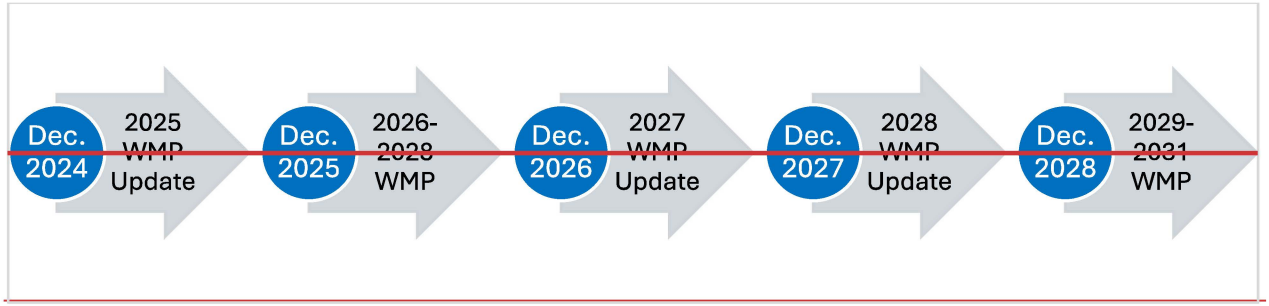
Multi-year WMPs~~,~~ are submitted every three years and must include ~~plans, at least,~~the utility's planned wildfire mitigation activities for, at minimum, the next three~~-~~ calendar years. The first Multi-year WMP ~~must~~will be submitted by December 31, 2025, for the 2026-2028 planning period, as shown in Figure 1 ~~below.~~

~~In~~. Subsequent Multi-year WMPs should be filed every three years thereafter, or on an alternative date designated by Commission order.

In any year when a Multi-year WMP is not required, ~~a WMP update~~each utility must ~~be submitted.~~submit a WMP Update. A WMP Update serves as a mechanism to update the

Commission on progress and changes to ~~plans articulated in a~~the most recent Multi-year WMP or ~~prior~~ WMP Update.

~~*Figure 1: WMP Planning Cycle*~~



~~2. WMP Review Process~~

~~The procedural steps in reviewing of Multi-year WMPs and WMP Updates is nearly identical. The one difference lies in the lack of a required review of WMP Updates by an independent evaluator. The review process for every WMP will contain, at minimum, the following steps:~~

~~1) Submission of the WMP and WMP Data Workbook~~
~~2) Completeness Check~~
~~3) WMP Presentation or Workshop~~
~~4) Opportunity for Public Comment on WMP~~
~~5) Draft Report by Staff~~
~~6) Commission Decision on WMP at Public Meeting~~

~~Upon filing, Staff will set a procedural schedule which includes the step 2-6 above. While each of these steps will be included in review of WMP submissions, they may not necessarily occur in the order listed. The design and implementation of this proposed process will serve the long-term regulatory efficiency goals through aligned, streamlined processes, inclusion, and transparency.~~

~~2.1 WMP Submission~~

~~2.1.1 Process and Timing~~

~~Pursuant to OAR 860-300-0020(2) WMPs must be submitted annually by December 31. The Multi-year WMP or WMP Update and all supporting documents must be submitted to the utility's WMP docket (UM 2207, UM 2208, or UM 2209). Every submission must comply with the general filing requirements found in OAR 860-001-0140(1).~~

~~2.1.2 Formatting Requirements~~

~~All WMP submissions should comply with the formatting requirements found in OAR 860-001-0140(2)-(4). Where feasible, submissions should be provided in a searchable format. For Multi-year WMPs and WMP Updates submissions should include the following:~~

- ~~Title Page The title page must provide 1. Name of the utility making the submission; 2. Title of the submission (e.g. 2025 WMP Update or 2026-2028 Multi-Year WMP); and 3. Date of the submission.~~
- ~~Table of Contents Where the submission is longer than 10 pages, not including the title page, the WMP submission must include a table of contents.~~

~~2.1.3 Confidentiality~~

~~The treatment of confidential information is set forth in of Ch. 860 Division 1 of the Oregon Administrative Rules (OAR). Confidential information should be clearly identified at the time a submission is made.~~

~~2.2 Completeness Check~~

~~Staff first assess each WMP for completeness based on the statutory requirements and adherence to the WMP Guidelines. The objective of the completeness check is to ensure WMP submissions are complete prior to commencing evaluation. The completeness check is not a substantive review of WMP content. The Completeness check will review the WMP submission for inclusion of all required materials. Completeness criteria for WMP Submissions include:~~

- ~~Multi-year WMP To be determined as part of Phase 2~~
- ~~WMP Update Provided in Section 4, below.~~
- ~~WMP Data Workbook Provided in Data Template Guidelines, Section 2.2~~

~~If a WMP submission is incomplete, Staff may request the filling Errata to provide the missing information. Staff's request for an Errata will include a timeline, between five and ten business days, for making the Errata filling. Should the utility fail to provide an Errata in the required timeframe the WMP submission will be rejected as incomplete.~~

~~2.3 Presentation or Workshop~~

~~Each utility will have the opportunity to present its WMP at either a public meeting or Commission-hosted workshop. Staff will provide notice of any workshops in the relevant WMP docket(s).~~

~~2.4 Public Comments~~

~~Public comment opportunity will be provided in every WMP docket. A deadline for filling of public comments will be set as part of the docket schedule. Additional public comment opportunities exist for providing comments on Staff's draft report, Staff's public meeting memo, and at the public meeting.~~

~~2.5 Draft Staff Report~~

~~Staff will publish a draft report which assesses each element of the WMP and makes a recommendation on plan approval. At minimum the Draft Staff Report will include the following:~~

- ~~Recommendation on approval The Draft Staff Report will include Staff's recommendation to approve, approve with conditions, or not approve a WMP. If Staff recommends approving a WMP with conditions, the conditions for approval will be articulated.~~
- ~~Determination of compliance with WMP requirements Staff will make a determination on compliance for each of the requirements set forth in statute or administrative rules. Staff may also determine compliance with WMP guidelines adopted by the Commission.~~
- ~~Recommendations on Areas for Additional Improvement The Draft Staff Report will include any recommendations on Areas for Additional Improvement in its draft report. These recommendations may be informed by the IE evaluation of the WMP. For ease of implementation Staff will include a recommended timeframe or priority designation for these recommendations.~~

~~2.6 Public Meeting Decision~~

~~The Commission will consider comments and recommendations on a utility's WMP filing at a public meeting within180 days of its submission. The Commission will consider whether to approve the WMP filing as meeting these Guidelines. The Commission may provide guidance on the development and content of future Plans.~~

~~3. WMP Evaluation~~

~~3.1 Staff Review Criteria~~

~~Staff first assess each WMP for completeness based on the statutory requirements and adherence to the WMP Guidelines. Staff will then assess the content of a WMP based on the following review criteria:~~

- ~~Compliance The plan meet requirements of applicable laws, regulations, and guidelines.~~
- ~~Efficiency The proposed initiatives are an efficient use of resources and the plan demonstrates how and why the selected initiatives provide reasonable balance of mitigation costs with the resulting reduction of wildfire risk..~~
- ~~Demonstrated Progress The plan demonstrates progress on objectives and targets reported in previous plans as well as recommendations adopted by the Commission. If not, is the lack of progress sufficiently explained.~~
- ~~Long-term Strategy The plan provides insight into the utility's long-term strategy to bolster its wildfire mitigation capabilities.~~
- ~~Data Driven The plan demonstrates a basis in quantitative data to drive identification of risk, selection of mitigation initiatives, designation of initiative metrics and targets, and evaluation of initiative performance.~~

~~Due to the nature of WMP Updates, one or more of the review criteria listed above may be inapplicable. For example, where a WMP update makes minimal or no changes to a Multi-year WMP, only the compliance criterion would apply. Where criteria are inapplicable for a WMP Update Staff will note which criteria do not apply in its report.~~

~~3.2 Revision Request~~

~~A WMP revision request is a requirement to update a WMP submission in response to critical issues identified by Staff. If, during substantive review of a WMP, Staff determines that a submission fails to address a critical issue impacting Staff's ability to recommend Commission approval of the submission it will issue a revision request. A revision request will include the following:~~

- ~~Issue(s) Requiring Revision Staff will provide a list and description of issues triggering the revision request.~~
- ~~Response and Revision Timeline Staff will articulate the timeline for a utility's written response to the revision request as well as the timeline to submit appropriate substantive revisions to the WMP.~~

~~A utility must provide written response to each issue described by Staff in the revision request and submit revised sections or WMP as appropriate. Should revision of a WMP submission require 20 business days or more days to complete, Staff will seek an order from the Commission to reject the WMP and order a WMP revision.Failure to provide responses to a revision request or make appropriate revisions will result in a recommendation the Commission not-approve the WMP.~~

~~3.3 Independent Evaluator (IE) Roll~~

~~Independent evaluators have proven invaluable in providing technical expertise, insight into wildfire mitigation best practices, and recommendations guiding the maturation of Oregon's wildfire planning processes. Noting that independent evaluators may be unfamiliar with Oregon's WMP requirements, an IE is better utilized in applying their areas of expertise to the WMPs as opposed to assessing WMP compliance. An IE may or may not be retained every~~

~~year and it is anticipated that the need for an IEs expertise will likely decrease as plans mature. When retained, an IE may support Staff in evaluating the WMP filings to provide recommendations on improvement opportunities or to provide technical expertise on a specific topic covered in WMPs.~~

~~3.3.1 Identification of Areas for Additional Improvement~~

~~An IE may be retained to aid Staff in evaluation of WMP submissions, particularly in years where Multi-year WMPs are filled. Staff endeavors to select an IE near or prior to a WMP submission date so that the IE may be engaged in the entirety of the evaluation process. For evaluation of WMP fillings the IE will be provided access to all submitted information, in accordance with applicable requirements for protection of confidentiality, and have the opportunity to request additional data from the utility.~~

~~The IE evaluation of a WMP will result in a set of recommendations. Where appropriate, the IE may designate which recommendations are most urgent or should otherwise be addressed in the near-term. IE recommendations are not binding on a utility unless adopted by the Commission.~~

~~3.3.2. Technical Expertise~~

~~An IE may also be retained to advise the Commission on a specific WMP topic that would benefit from additional technical expertise. The resulting IE recommendations may inform changes to, or adoption of, WMP guidelines. For example, the Commission could retain an IE to provide recommendations on best practices for utility risk quantification, informing development of risk quantification guidelines. Just as Staff intends to use WMP Update years to focus on specific areas of WMP maturation, the use of an IE to provide technical expertise is most likely to occur in years when WMP Updates are filled.~~

~~Where necessary, the IE will be provided access to all information submitted through WMP fillings, in accordance with applicable requirements for protection of confidentiality, and have the opportunity to request additional data from the utility.~~

~~Phase 1 Updated Staff Proposal~~
~~Wildfire Mitigation Plan (WMP)~~
~~Process and Planning Cycle Guidelines~~

~~4.~~ WMP ~~Updates~~Update Guidelines

This guideline provides requirements for the contents of a WMP Update. A WMP Update is required in years when a Multi-year WMP is not filed. The goal of a WMP Update is to update the Commission on changes made since the Commission's decision on the utility's Multi-year WMP and report progress towards implementing Areas for Additional Improvement. A utility must include all significant changes to key plan elements which, described in detail below, in a WMP Update. ~~The review process and evaluation criteria for a WMP Update is outlined in Sections 2 and 3 of these guidelines.~~

~~4.~~1. Update Contents & Submission Schedule

A WMP Update must contain the following:

- ~~Reportable changes to Key Plan Elements~~ WMP Regulatory Compliance Index;
- Significant changes to key plan elements from updates to the previous WMP ~~filling~~filing or applicable Multi-year WMP;
- Steps taken towards implementation of Areas for Additional Improvement;[1] and
- ~~WMP Regulatory Compliance Index~~
- ~~Any other~~Additional contents required by the Commission.

A WMP Update may contain the following at the utility's discretion:

- Introduction to the WMP Update which may include an executive summary, background, or regulatory context;
- ~~(Program~~Programmatic sharing~~)~~ which may include additional information the utility wishes to provide about its wildfire mitigation efforts not otherwise required in the WMP Update;
- Lists of Tables and/or list of Figures contained in the WMP Update;
- List of Acronyms used in the WMP Update; and
- Appendixes which provide additional information supporting the WMP Update.

~~4.1.1 Key Plan Elements~~

~~A WMP Update should address significant changes to the Multi-year WMP or prior filling that occurs in any key plan elements. For example, a 2028 WMP Update should include any significant changes from the 2026-2028 Multi-Year WMP and/or any significant changes from the 2027 WMP Update. Significant changes to any of the following key plan elements must be included in the WMP Update:~~

- ~~Risk Models~~
- ~~New or Discontinued Initiatives~~
- ~~Approved Targets, Objectives, or Expenditures~~

[1] Areas for Additional Improvement refers to Staff or Independent Evaluator (IE) recommendations which were adopted by the Commission as part of WMP approval, discussed in ~~Section4~~Section 4.6 below.

~~4.1.2 No Updates~~

1.1 Contents if no updates are required

If there are no significant changes to the key ~~pan elements listed above~~plan elements or if there are no additional contents required by the Commission, the WMP Update must state this explicitly.

~~4.~~1.2 WMP Data Submission Schedule

A fully complete WMP includes both the Plan as well as the supporting data that results in the documented plan. Below is the proposed timeframe for each of the elements. Due to the need for Plans to be filed by December 31, according to legislation, fourth quarter details are augmented into an initial filed dataset. For example, shown below is the schedule for the 2025 WMP Update.

Table 1: Submission Element Description Deadline

Submission Element	Description	Deadline
2025 WMP Update	WMP Written Plan	December 31, 2024
2025 WMP Data Template Workbook Initial Filing	Including data through Q3 2024	December 31, 2024
2025 WMP Data Template Workbook Final Filing	Updating data through Q3 2024 and appending Q4 2024	March 31, 2025

2. WMP Regulatory Compliance Index

The goal of the WMP Regulatory Compliance Index is to allow stakeholders and Staff to quickly identify where current information is located for each WMP requirement articulated in the ~~OARs~~OAR. Since the transition to a multi-year wildfire mitigation planning cycle creates the potential for the most up to date information about a utility's mitigation to be split between a Multi-year WMP and WMP Update, it is necessary to identify where compliance information is located. A WMP Update must contain a table with the following fields:

- OAR Rule Citation: The compliance index should contain all administrative rules applicable to the contents of a WMP.
- Document: The document field should reference the applicable year and type of ~~filling.~~filing (Ex. ~~20206-2029~~2026-2028 Multi-Year WMP or 2027 WMP Update~~)~~).
- Location: Page Number(s)/Document Section(s~~)~~).

An exemplary portion of the Regulatory Compliance Index is provided for reference. The WMP Update should contain a similar table with all administrative rules applicable to the WMP.

Figure 1: Example WMP Regulatory Compliance Excerpt

Rule Citation (OAR)	Document	Location
860-024-0018(1)	2026-~~2029~~2028 Multi-Year WMP	p. 10-15
860-300-0030	2027 WMP Update	p. 7
860-300-0040(1)	2028 WMP Update	p. 22
860-300-0040(1)(a)	2026-~~2029~~2028 Multi-Year WMP	p. 80-92
860-300-0040(1)(A)	2028 WMP Update	p. 30
860-300-0050	2026-~~2029~~2028 Multi-Year WMP	p. 100-119
860-300-0060	2027 WMP Update	p. 19

~~4.~~3. Significant Updates to Key Plan Elements

3.1 Key Plan Elements

A WMP Update should address significant changes to the Multi-year WMP or prior filing that occurs in any key plan elements. For example, a 2028 WMP Update should include any significant changes from the 2026-2028 Multi-Year WMP and/or any significant changes from the 2027 WMP Update. Significant changes to any of the following key plan elements must be included in the WMP Update:

- Risk Models;
- New or Discontinued Initiatives; and
- Approved Targets, Objectives, or Expenditures.

3.2 Risk Model

~~4.~~3.2.1 Threshold for Significant Risk Model Updates

The following changes to a risk model are significant:

- Where a utility has ranked the ignition risk of circuits, segments, or spans, any change or combination of changes to a risk model that moves ~~10~~ten percent or more of ignition risk into or out of the top ignition risk circuits, segments, or spans.
- Introduction of a new model.
- Discontinuation of an existing model.
- Any change in existing model application or use-case. For example, newly applying an existing vegetation risk model to PSPS decision-making.
- Introduction of new data types. For example, incorporating additional risk drivers into newer versions of a model.
- Changes to data sources. For example, using a new source of data to measure vegetation moisture content.
- Changes to third-party vendors for risk modeling or inputs to risk modeling

~~4.~~3.2.2 Content Required for Significant Update

Where a change to a risk model is significant, a utility must provide the following:

- Discussion of the updated methodology and/or models: This should include a narrative discussion of the change and any additional information necessary to understand the changes made (data, diagrams, tables, etc.). This should include a comparison of the updated model with the prior risk model.
- Justification for the update: This should include a narrative discussion along with any quantitative data supporting the change.
- Show how risk has shifted as a result of the update: This should include a narrative discussion of and any additional information necessary for complete understanding of the results (data, diagrams, tables, etc.). This discussion should include a summary comparison of assets categorized by risk level using the updated model versus prior risk model~~. (~~—does the updated model elevate the risk level of any assets~~).~~?
- Resulting changes to mitigation initiatives: This should include a narrative description which addresses, at minimum, any changes in prioritization of mitigation initiatives, scheduling, or workplans resulting from the change.

The required information should be provided for each significant change to a risk model. For example, if a utility made significant changes to a model that calculated asset risk and a second model that calculates consequence of ignition, the WMP Update would need to include the required risk model update information for each of the two risk model changes.

~~4.4~~3.3 New or Discontinued Initiatives

Any change which establishes a new initiative or discontinues an initiative is significant and must be reported in a WMP update.[2] The utility must report on the creation of a new program, or the discontinuance of a program described in its most recently approved Multi-year WMP. Each change must be justified by lessons learned, internal policy changes, new laws or regulations, or other explanations for the change.

3.4~~.5~~ Initiative Updates

For each initiative update the electric company should detail the targets, objectives, and expenditures for which the utility is proposing a significant update. The below subsection provides details regarding the specific significant qualifications required for reporting any initiative updates.

3.4~~.5~~.1 Thresholds for Significant Initiative Updates

- Target: For large volume work (equal to or greater than 100 units), changes of ~~10~~ten percent or greater to a WMP Update reporting period target from the most recently approved Multi-year WMP constitute a significant change and must be reported. For small volume work (less than 100 units), changes of 20 percent or greater to a WMP Update reporting period target from the approved Multi-year WMP constitute a significant change and must be reported.
- Objective: Any changes to forecasted initiative objective which shifts the completion dates in its most recently approved Multi-year WMP into the next calendar year constitute a significant change and must be reported. For example, if undergrounding of lines was forecasted to be completed by September ~~13,~~ 2027, in the most recently approved Multi-year WMP and is now forecasted completion date is changed to March ~~22,~~ 2028, then the change must be included in the WMP Update.
- Expenditures: Significant changes to expenditures include any change to project expenditures in the most recently approved Multi-year plan which constitute a ~~greater~~

[2] An initiative is defined as wildfire mitigation project, pilot, or program.

~~than~~change of at least 20 percent ~~change~~ in an initiative's planned total expenditure during the reporting period. For example, if in the most recently approved Multi-year WMP an initiative's expenditures for the 2027 period were forecasted as $100 and the utility now forecasts spending $~~120.99~~121 on the initiative in 2027 then the change in expenditure would be significant and need to be included in the WMP Update. As an alternative, should the initiative's expenditures be forecast at $79, then the change in expenditure would be significant and need to be included in the WMP Update.

3.4.~~5~~.2 Content Required for Significant Initiative Updates

Where a utility makes a significant change from its most recently approved ~~previous~~ WMP ~~filing~~filing or applicable Multi-year WMP to targets, objectives, or expenditures ~~if~~it must ~~provide~~ report such changes in a WMP update. Each change must be justified by lessons learned, internal policy changes, new laws or regulations, or other explanations for the change. Justifications should be provided in narrative form and include any other information necessary (data, diagrams, tables, etc.) for complete understanding of the update.

4.~~6~~ Areas for Additional Improvement

A WMP Update must report on implementation or progress required by the Commission through adoption of Staff recommendations, collectively referred to as Areas for Additional Improvement. The WMP Update must provide narrative responses to each Area for Additional Improvement which requests reporting in the year associated with the WMP Update.

- Areas for Additional Improvement/Recommendation: This should include a citation to the Area of Additional Improvement being discussed. This citation should include the order number as well as the recommendation number. For example, Idaho Power's citation to Staff's second recommendation adopted in Order 24-231 might look like "24-231_2".
- Requirements: This is the work or information being required in the Area for Improvement or recommendation. The utility may use the verbatim text of the recommendation to meet this requirement. For example, the requirements of Staff's second recommendation for Idaho Power adopted in Order 24-231 might read "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)."
- The utility's response: This should include a narrative description of the utility's response including any additional information necessary to understand that response (data, diagrams, tables, etc.). To the extent that additional work was necessary to determine the appropriate response, a utility should describe what steps were performed, including any workshops, or external coordination.

4.~~9~~5. Other Contents Required by the Commission

The Commission may, at its own discretion, require changes to the ~~inclusion of additional~~ contents in a WMP Update~~.~~, which could include reductions or additions. For example, 2025 WMP Updates will also include completion of data templates.[3]

[3] "[T]he 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 2026 or future plans."

~~4.1~~06. WMP Update Format

This section provides an example of a table of contents and headings which meet the requirements in Section 2.1.2 and Section 4.1.[4] The example and includes optional WMP Update contents and assume the existence of significant updates across all key plan elements. This section does not address the substantive contents of WMP Updates.

Table of Contents Example for a WMP Update

Table of Contents 1
List of Figures 2
List of Tables 3
Acronyms 4
Introduction 5
Wildfire Mitigation Plan Compliance Index 6
Significant Risk Model Updates 7
    Model Update 1 8
    Model Update 2 9
New or Discontinued Initiatives 10
    New Initiative 1 11
    New Initiative 2 12
    Discontinued Initiative 1 13
Existing Initiative Updates 14
    Existing Initiative 1 15
        Target Update 16
        Objective Update 17
        Expenditure Update 17
    Existing Initiative 2 18
        Objective Update 19
    Existing Initiative 3 20
        Target Update 21
        Expenditure Update 22
Areas for Additional Improvement 24
Additional Requirements 25
Program Sharing 25
Appendix A –Additional information supporting WMP Update 26

[4] **Bold** text indicates a required section of the WMP Update. Text in blue is provided for illustrative purposes only.

~~Phase 1 Updated Staff Proposal~~

Wildfire Mitigation Plan (WMP) - Data Template Guidelines

~~Overview~~

This document is the Oregon Public Utility Commission's (OPUC or Commission) Data Guidelines for electric utilities submitting the WMP Data Template Workbook. This includes tabular wildfire mitigation data to support the OPUC review of compliance with ORS 757.963~~.~~ and OAR 860-300-0020(2).

These guidelines set forth the required standards, schemas, and schedule for the submission of WMP Data Template workbook. The Commission will provide a WMP Data Template Workbook ~~template~~. The ~~template~~ WMP Template Data Workbook will be provided to each electric utility, and new template workbooks will be made available if future changes to these guidelines are made.

1.1 Submission Schedule

The WMP Data Template Workbook~~, is~~ shall be submitted ~~to the OPUC~~ on ~~an annual basis, on or before (DATE). Data Report submissions should~~December 31 and March 31 each year. The December 31 submission shall contain data for the first three quarters (January through September) of the reporting period year. The March 31 submission shall include fourth quarter (October through December) results for the ~~previous~~reporting year period. For example, the December 31, 2025, WMP Data Template ~~should~~Workbook shall include data from January 1, 2024 through ~~December~~September 30, 2024, and the subsequent filing on March 31, ~~2024.~~2025, shall include any Q1–Q3 2024 updates and Q4 2024 results. Data submissions ~~must~~ include data for events which occurred during the reporting period and data for all assets in place by the end of the reporting period. Table 1 outlines the WMP Data Template Workbook tables and reporting schedule.

Table 1. WMP Data Template Workbook Worksheet Submission Schedule Details

Worksheet	December 31 Submission of Q1-Q3, (field requirements)	March 31 Submission of Q4, (field requirements)
Cover Sheet	All fields	All fields
Table 1	All fields	Only if corrections
Table 2	All fields	All fields
Table 3	'Year' Q1-3	'Year' Q4 & Q1-3 corrections
Table 4	'Year' Q1-3	'Year' Q4 & Q1-3 corrections
Table 5	'Year' Q1-3	'Year' Q4 & Q1-3 corrections
Table 6	All fields	Only if corrections
Table 7	'Year' Q1-3	'Year' Q4 & Q1-3 corrections
Table 8	'Year' Q1-3	'Year' Q4 & Q1-3 corrections
Table 9	'Year' Q1-3	'Year' Q4 & Q1-3 corrections
Table 10	All fields	Only if corrections
Table 11	All fields	Only if corrections

Worksheet	December 31 Submission of Q1-Q3, (field requirements)	March 31 Submission of Q4, (field requirements)
Table 12	'Year' Q1-3	'Year' Q4 & Q1-3 corrections
Table 13	All fields	All fields

When submitting the WMP Data Template Workbook, the file name ~~must~~shall include the reporting period, utility abbreviation shown in ~~the~~ Table ~~1~~2, and the ~~filling~~filing type~~.~~ (Q1-3 or All). For example, the WMP Data Template Workbook submitted by PacifiCorp in 2030, reporting data for 2029, could be named *"2029_PAC_DataWorkbook~~_~~ _Q1-3"* or *"2029_PAC_DataWorkbook_All".*

Table ~~1.~~2. Electric Utility Abbreviations

Electric Company	WMP Abbreviation
PacifiCorp	PAC
Portland General Electric	PGE
Idaho Power Company	IPC

1.1.1 Designation of Confidential Information

An electric company may request a confidential designation consistent with ~~of~~ Ch. 860 Division 1 of the Oregon Administrative Rules. Any confidential information should be identified, at the same time the data is submitted. Designation of confidential information should clearly designate the cells, files, or schema ~~obtaining~~containing confidential information. A designation of confidentiality should be provided at the most granular level possible. In other words, an electric company should not broadly designate a ~~table~~worksheet as confidential if only portions of the ~~data table~~worksheet meet the requirements of Division 1.

1.2 Errata, Revisions, and Versions

If revision of a WMP Data Workbook submission is needed, an electric company ~~must~~shall incorporate the revisions into its WMP Data Workbook and resubmit the ~~table~~worksheet(s) in their entirety with other fields unchanged.

When a data submission includes revisions to previously submitted data, the electric company must provide a cover letter containing the following information for each record being revised:

- Description
- Explanation for each revision

All data submissions, including errata or revisions, must comply with guidelines in effect when the submission is made.

2 WMP Data Template Workbook

2.1 Filling out the WMP Data Template Workbook

Within each ~~table~~worksheet, where appropriate, fields are either pre-populated or specific values identified. Please use these to guide your submittals.

Requirements for Data

The data submitted by ~~a~~an electric utility ~~must~~shall comply with each of the following requirements:

- Completeness: The electric utility ~~must~~shall report performance on each metric contained in each sheet of the ~~template~~ WMP Data Template Workbook except where a section pertaining to a given table of the template specifies otherwise. Where the electric utility does not collect its own data on a given metric, the electric utility ~~must~~shall clearly identify the owner and dataset used to provide the response in the "Comments" column.
- Comparability: For fields where acceptable values are defined, ~~a~~an electric utility ~~must~~shall adhere to the acceptable values provided in these guidelines. Do not add any extraneous characters or white spaces.
- Empty: Filings must differentiate between data which are "zero," "missing," or "not applicable" as follows:
  - Zeros: Data that are zero must be filled out as "0"
  - Missing or Not Applicable: Data that are missing or not applicable must be provided as empty fields. ~~The "Blank Meaning" column at the end of each table must be used to indicate whether the field is blank because the data is missing, or the field is not applicable.~~
- Internal Consistency: The wildfire mitigation data submitted by the electric company should be internally consistent with any geospatial data submitted by the electric company.

OPUC may reject data submissions that do not comply with the above requirements or the required schema and direct an electric company to file corrected data or a resubmission

2.2 WMP Data Template Workbook Cover Sheet

The "Cover Sheet" is the first sheet in the WMP Data Template Workbook. This sheet provides an overall report overview and helps to outline the individual responses and HFRZ that are unique to each of the reporting utilities.

Please complete this page first as it provides the basis and electric utility specific details for completion of the following worksheets.

- Utility Name: Use the drop down to select the appropriate name for the electric utility submitting the data. *This field is incorporated into the subsequent workbooks.*
- Submission Date: The date the data was provided.
- Reporting period year: is defined as the actual period of time for the provided relevant data. For example, the 2030 WMP filing should include data for the 2029 reporting period year. In this example, all data should be accurate as of December 31, 2029, including any projections of future costs~~.~~ (this may also be called reporting year). *This field is incorporated into the subsequent ~~workbooks~~worksheets.*

- Submission Type: is defined based on the time of the filing.
    - For filings meeting the December 31 deadline select "Initial" as the submission type.
    - For filings meeting the March 31 deadline select "Final" as the submission type.
- Reporting Year Risk Designation: This attribute is used by the reporting electric utility to identify distinction levels of Wildfire Risk for the given reporting period year. (For example, Yellow and Red Risk Zones, Tier 1 or Tier 2, or HFRZ~~)~~). The data is prepopulated based on the Utility Name Selection. *This field is incorporated into the subsequent ~~workbooks.~~ worksheets. For any electric utility that does not differentiate levels of HFRZ they should complete the second row as N/A.*
- Other Risk Category: Risk category used by some utilities to define an area that is not identified as a HFRZ; however, the electric utility has deemed the area with some fire risk potential beyond the Non-HFRZ classification. These areas may signify areas in which the electric utility feels it is necessary to provide some wildfire mitigation work or areas potentially not yet designated as HFRZ (i.e.~~.~~, areas of interest~~)~~). Denote the method by which the electric utility is recognizing changing risk areas.
- Geographic Designation ID: PUC auto-created reference ID for the specific geographic area.
- Geographic Designation Name: Electric utility geographic Designated Areas represent geographical subareas which the electric utility identifies as having a level of fire risk above non-HFRZ (including areas of interest). The geographical areas are often contained within a single boundary/polygon or a localized grouping of areas. These areas may highlight specific area mitigation projects based on risk analysis for the given location. Examples of previous Geographical Designated Areas provided in electric utility filed WMPs include Idaho Power Company's (Austin Junction, OR, or Halfway, OR), PacifiCorp's (Hood River, Roseburg), Portland General Electric's (Zone1~~,~~ or Zone 5). *This field is incorporated into the subsequent ~~workbooks~~worksheet Table 1.*
- Fire Season Start Date: Electric utility specified reporting period date of fire season start for the geographic designated area.
- Fire Season End Date: Electric utility specified reporting period date of fire season end for the geographic designated area.

2.3 Substantive WMP Data Workbook ~~Sheets~~Tables

2.3.1 Table 1: System Overview

The "System Overview" is used to provide a summary or snapshot of the system assets for the reporting period, distinguished by the type of wildfire risk level identified by the electric utility. The table is broken into the Metric Type/Asset with the Units column defining the value of measurement. Please refer to WMP Glossary for additional terminology details.

The total of all the values in the Non-HFRZ and each of the subsequent HFRZ ID should be equivalent to the Electric utility's System totals for the State of Oregon.

Field Name	Field Description	Field Value Constraints
Geographic_Designation_ID *(pre-populated with utility defined inputs from cover sheet)*	Auto-created reference ID for the specific geographic area sourced from cover sheet.	Numeric ≥ 1
Metric_Type *(predefined)*	A brief description of the Metric –Type~~.~~: - Primary UG Distribution Lines - Primary OH Distribution Lines - Secondary Distribution Lines - OH Transmission Lines - UG Transmission Lines - Transmission Substation - Distribution Substation - Connected Device (controllable device) - Connected Device (non-controllable device) - CFCI (sensory) - Fuse - Nonexplosion Fuse - Lightning Arrester - Support Structure/pole - Tree Attached Equipment - Switchgear - Transformer - Camera - Weather Station - Customer/Meters - Commercial Customers - Total Acres - Planned Outages - Unplanned Outages Note: Transmission lines refer to all lines at or above 65kV, and distribution lines refer to all lines below 65kV.	Restricted to values indicated in Field Description.
Geographic_Designation_Name *(pre-populated with utility defined inputs from cover sheet)*	Electric utility defined localized geographic designated subarea which represents the utility identifies as having a level of fire risk above non-HFRZ (including areas of interest).	Text
Reporting Year Risk Designation *(pre-populated with utility defined inputs from cover sheet)*	HFRZ areas and relevant sub-categories, if applicable, as defined by the electric utility on the cover sheet.	Restricted to values indicated in Field Description.
Unit(s) *(pre-defined)*	Predefined unit measurements for reporting period metric type.	Restricted to values indicated in Field Description.
'Year' *(utility provided results for the reporting period identified on cover sheet)*	Electric utility provided values for the indicated metric based on the pre-defined units for the reporting period year.	Numeric ≥ 0, or blank
Comments *(utility provided)*	Electric utility provided additional/other comments, if needed.	Text

2.3.2 Table 2: Initiative Data

~~Table 2 provides reports on WMP initiative activities. Each initiative activity must~~Table 2 summarizes the electric utilities current WMP initiatives (which shall be described in detail in the annual WMP written report). The inputs into table 2 shall summarize the detailed WMP report initiatives providing an overview of the electric utility's goals, objectives, targeted risk reduction, alignment with the OPUC's initiative categories and activities, current status, and the expected units and spend for the reporting year. The table is not meant to be source for detailed initiative information but rather a summarized review of initiatives. Table 2 also acts as a complement to Table 13 creating an associated relationship of the electrical utilities' internal projects and initiatives to the OPUC initiative categories and activities provided in section 3.2. Each initiative activity shall be provided as a record with the following fields:

Field Name	Field Description	Field Value Constraints
UtilityID *(pre-populated with utility defined inputs from cover sheet)*	Standardized ID of the electrical ~~corporation~~utility; values are as follows: - Idaho Power - PacifiCorp - Portland General Electric	Restricted to values indicated in Field Description
Reporting_Period_Year *(utility provided)*	Date of submittal of the plan formatted as YYYY.	Date
Initiative_Classification *(pre-defined dropdown)*	- Program - an ongoing, function or operation (e.g., detailed asset inspections) - Project - a temporary endeavor undertaken to create a unique product, service, or result with a start and end date. (e.g., installing a microgrid, undergrounding a circuit segment, etc.) - Pilot - typically limited in scope, experimental, and exploratory studies of new equipment, technology, etc. for consideration of broader deployment	Restricted to values indicated in Field Description
Start_Date *(utility provided)*	Start date for initiative	Date
End_Date *(utility provided)*	Estimated end date for initiative	Date
Utility_Initiative_Name *(utility provided)*	Electric utility name for the initiative.	Text
Initiative_Description *(utility provided)*	~~500-character text field.~~A brief description of the initiative. Note a more detailed description of the initiative shall be provided in the written WMP filing. Use the "WMP_Page_Number" field described below to provide a report reference to location of the detailed initiative	Text
Initiative_Objective *(utility provided)*	A brief statement of the initiative activity intent ~~that is limited to 500 characters~~ (e.g., what does the electric utility plan to accomplish with this initiative).	Text
WMP_Initiative_Category *(pre-defined dropdown)*	The WMP Initiative Category under which the subject WMP Initiative Activity is organized. An overview of Initiative Categories ~~are~~is found in section 3.2.	Restricted to values indicated in Field Description.

Field Name	Field Description	Field Value Constraints
WMP_Initiative_Activity *(pre-defined dropdown)*	The name of the subject WMP Initiative Category-Activity, as provided by OPUC. An overview of Initiative Category-Activities ~~are~~is found in section 3.2. If this value is "Other," provide the Initiative Activity name in the following column Activity_Name_if_Other.	Restricted to values indicated in Field Description.
Activity_Name_if_Other *(utility provided)*	If WMP_Initiative_Activity was "Other," provide the Initiative Activity name as it is referred to in the electrical ~~corporation's~~utility's WMP.	Text
Utility_Initiative_Tracking_ID *(utility provided)*	The "Utility Initiative Tracking ID" is the unique tracking ID for a given initiative activity. This ID must match the "Utility Initiative Tracking ID" field for the same initiative activity in all data submissions for the initiative's entire lifecycle.	Text
WMP_Page_Number *(utility provided)*	Page of most recent WMP where initiative is detailed. If the initiative is detailed on multiple pages, indicate the first page.	Integer
Risk_Target_Reduction *(pre-defined dropdown)*	Risk components targeted for reduction by implementing the initiative: - Equipment ignition likelihood - Contact from vegetation ignition likelihood - Contact by object ignition - Wildfire spread - Wildfire hazard - Wildfire exposure potential - Wildfire vulnerability - PSPS likelihood - PSPS exposure potential - PSPS vulnerability	Restricted to values indicated in Field Description.
Unit_Measurement *(pre-defined dropdown)*	Predefined unit measurements for reporting period metric type~~.~~: - # of acres - # of assets - # of cameras - # of cameras (AI detection) - # of critical facilities - # of customers belonging to medically vulnerable populations - # of customers commercial - # of customers residential - # of customers total - # of days - # of events - # of hours - # of ignitions - # of incidents - # of linear miles - # of meetings - # of meters - # of minutes - # of outages - # of risk events	Restricted to values indicated in Field Description.

Field Name	Field Description	Field Value Constraints
	- # of structures - # of substations - # of weather stations - N/A - Other	
'Year'_Actual_Units *(utility provided)*	Electric utility provided units for the indicated metric based on the pre-defined units for the reporting period year.	Numeric ≥ 0, or blank
'Year'_Actual_$ *(utility provided)*	Electric utility provided actual spend for the indicated metric based on the pre-defined units for the reporting period year.	Numeric ≥ 0, or blank
Status *(pre-defined dropdown)*	Initiative activity status designations. Acceptable values are as follows: - Planned - In Progress - Completed - Delayed - Cancelled - Ongoing	Restricted to values indicated in Field Description.
Corrective_Actions_If_Delayed *(utility provided)*	If projected progress vs. actual progress indicates a delay in an electrical ~~corporation's~~utility's implementation of its initiative activity, the electrical ~~corporation~~utility must detail corrective actions it is taking to address the delay.	Text

2.3.3 Table 3: Transmission and Distribution Inspections

Wildfire Mitigation Data Table 3 includes reporting on the electric utility's overall transmission and distribution asset inspection program. This information serves as a gauge for the reporting years inspected assets based on the asset location for the Plan_Year_Risk_Designation and any priority condition findings. Inspections are categorized based on the inspections type (including a category for any additional ignition prevention inspection programs), the inspection method, and inspection findings. The electric utility may use the comment field to define/align to its internal program name.

In the absence of certain data elements, Staff will work with the utilities should there be a need to create a "proxy" or approach for estimating requested data while the utility systems evolve to provide the specific data. Provide a brief note in the comments for each attribute explaining the current "proxy" approach and a timeframe for when specific data is planned to be completed. Detailed program evolution may be outlined in the WMP report filing.

Field Name	Field Description	Field Value Constraints
Metric_Type *(pre-defined)*	Overview categorization for input metric. Note this includes a count of any existing tree attachments which are required to be removed by 2027 ~~(OAR 860-024-0018(2)).~~ (OAR 860-024-0018(2)).	Restricted to values indicated in Field Description.

Field Name	Field Description	Field Value Constraints
	- Tree attachments - Grid condition asset inspections	
Metric_Name *(pre-defined)*	A brief description of the metric based on the Metric_Type categorization. Possible Metric_Name include: - Number of tree attachments[1] - Number of circuit miles inspected - Number of assets inspected - Priority A findings[2] - Priority B findings[3] - Priority C findings[4] - Ignition prevention findings[5]	Restricted to values indicated in Field Description.
Reporting Year Risk Designation *(pre-populated with utility defined inputs from cover sheet)*	HFRZ areas and relevant sub-categories, if applicable, as defined by the electric utility. Note if n/a and strikethrough it is a result of your utilities unique HFRZ designation being not applicable.	Restricted to values indicated in Field Description.
Line_Type *(pre-defined)*	Transmission or Distribution. Note: Transmission lines refer to all lines at or above 65kV, and distribution lines refer to all lines below 65kV	Restricted to values indicated in Field Description.
Inspection_Type *(pre-defined)*	Inspection Types - Patrol Inspections[6] - Detailed inspection[7] - Ignition Prevention Inspection[8] - Other Inspections (provide details in the comment field)	Restricted to values indicated in Field Description.
Inspection_Method *(pre-defined)*	Inspection Method - Drone - Aerial - LiDAR - Other (provide details in the comment field)	Restricted to values indicated in Field Description.
Unit(s) *(pre-defined)*	Predefined unit measurements for reporting period metric type. For asset points a single unit applies to the physical location of the asset and all equipment at the singular point (ex: a pole and all subsequent equipment on the pole should be identified as a single asset, and counted as one unit)	Restricted to values indicated in Field Description.
'Year' Q1-3 *(utility provided results for the reporting period identified on cover sheet)*	Electric utility provided values for the indicated metric based on the pre-defined units for January through September of the reporting period year.	Numeric ≥ 0, or blank
'Year' Q4 *(utility provided results for the reporting period identified on cover sheet)*	Electric utility provided values for the indicated metric based on the pre-defined units for October through December of the reporting period year.	Numeric ≥ 0, or blank

[1] Tree attachments, OAR 860-~~240~~024-0018(2~~)~~).
[2] Immediate Hazard, Priority A, OAR 860-024-0012(1~~)~~).
[3] ~~2~~Two Year Correction, Priority B, OAR 860-024-0012(2~~)~~).
[4] Deferral, Priority C, OAR 860-024-0012(3)(a~~)~~).
[5] Ignition Prevention Finding, OAR 860-024-0018(5)(b), 180 days.
[6] Safety Patrol, OAR 860-024-0011(2)(c).
[7] Detail, OAR 860-024-0011(1)(B).
[8] HFRZ Ignition Prevention Inspection, OAR 860-240-0001, Ignition prevention OAR 860-024-0018(3)(a).

Field Name	Field Description	Field Value Constraints
Comments *(utility provided)*	If Inspection_Type or Inspection_Method was "Other," provide details. Provide any additional/other comments, if needed.	Text

2.3.4 Table 4: Transmission and Distribution Correction

Wildfire Mitigation Data Table 4 correlates with the inspection results and findings provided in Table 3. The table similarly reflects fields in Table 3 but asks for correction results by priority rating.

In the absence of certain data elements, Staff will work with the utilities should there be a need to create a "proxy" or approach for estimating requested data while the utility systems evolve to provide the specific data. Provide a brief note in the comments for each attribute explaining the current "proxy" approach and a timeframe for when specific data is planned to be completed. Detailed program evolution may be outlined in the WMP report filing.

Field Name	Field Description	Field Value Constraints
Metric_Type *(pre-defined)*	Overview categorization for input metric. Note this includes a count of pole replaced tree attachments (OAR 860-024-0018(2)) - Tree attachments - Grid condition asset inspections	Restricted to values indicated in Field Description.
Metric_Name *(pre-defined)*	A brief description of the metric based on the Metric_Type categorization. Possible Metric_Names include: - Number of pole replaced tree attachments[1] - Priority A findings[2] - Priority B findings[3] - Priority C findings[4] - Ignition prevention findings[5]	Restricted to values indicated in Field Description.
Reporting_Year_Risk_Designation *(pre-populated with utility defined inputs from cover sheet)*	HFRZ areas and relevant sub-categories, if applicable, as defined by the electric utility.	Restricted to values indicated in Field Description.
Line_Type *(pre-defined)*	Transmission or Distribution. Note: Transmission lines refer to all lines at or above 65kV, and distribution lines refer to all lines below 65kV	Restricted to values indicated in Field Description.
Inspection_Type *(pre-defined)*	Inspection Types - Patrol Inspections - Detailed Inspection - Ignition Prevention Inspection - Other Inspections (provide details in the comment field)	Restricted to values indicated in Field Description.
Inspection_Method *(pre-defined)*	Inspection Method - Drone - Aerial - LiDAR - Other (provide details in the comment field)	Restricted to values indicated in Field Description.

Field Name	Field Description	Field Value Constraints
Unit(s) *(pre-defined)*	Predefined unit measurements for reporting period metric type. For asset points a single unit applies to the physical location of the asset and all equipment at the singular point (ex: a pole and all subsequent equipment on the pole should be identified as a single asset, and counted as one unit)	Restricted to values indicated in Field Description.
'Year'_Q1-3_Correction_of_'Year'_Inspection_Finding *(utility provided results for the reporting period)*	Electric utility provided values for the indicated metric based on the pre-defined units for January through September of the reporting period year. For example, in reporting year 2024, the number of corrections ~~in~~from January through September 2024, that were the result of a correction found in 2024.	Numeric ≥ 0, or blank
'Year'_Q1-3_Correction_of_'Year-1'_Inspection_Finding *(utility provided results for the reporting period)*	Electric utility provided values for the indicated metric based on the pre-defined units for January through September the reporting period year. For example, in reporting year 2024, the number of corrections ~~in reporting period~~from January through September 2024, that were the result of a correction found in ~~the prior year~~2023.	Numeric ≥ 0, or blank
'Year'_Q1-3_Correction_of_'Year-2'_Inspection_Finding *(utility provided results for the reporting period)*	Electric utility provided values for the indicated metric based on the pre-defined units for January through September the reporting period year. For example, in reporting year 2024, the number of corrections ~~in the reporting year~~from January through September 2024, that were the result of a correction found ~~2 years prior~~in 2022.	Numeric ≥ 0, or blank
'Year'_Q1-3_Correction_of_'Year-3'_or_Prior_Finding *(utility provided results for the reporting period)*	Electric utility provided values for the indicated metric based on the pre-defined units for January through September the reporting period year. For example, in reporting year 2024, the number of corrections ~~in the reporting~~from January through September 2024, that were the result of a correction found ~~3~~in 2021 or more years prior.	Numeric ≥ 0, or blank
'Year' Q4 Correction of 'Year' Inspection Finding *(utility provided results for the reporting period)*	Electric utility provided values for the indicated metric based on the pre-defined units for October through December of the reporting period year. For example, in reporting year 2024, the number of corrections from October through December 2024, that were the result of a correction found in 2024.	Numeric ≥ 0, or blank
'Year' Q4 Correction of 'Year-1' Inspection Finding *(utility provided results for the reporting period)*	Electric utility provided values for the indicated metric based on the pre-defined units for October through December of the reporting period year. For example, in reporting year 2024, the number of corrections from October through December 2024, that were the result of a correction found in 2023.	Numeric ≥ 0, or blank
'Year' Q4 Correction of 'Year-2' Inspection Finding *(utility provided results for the reporting period)*	Electric utility provided values for the indicated metric based on the pre-defined units for October through December of the reporting period year. For example, in reporting year 2024, the number of corrections from October through December 2024, that were the result of a correction found in 2022.	Numeric ≥ 0, or blank
'Year' Q4 Correction of 'Year-3' or Prior Finding *(utility provided results for the reporting period)*	Electric utility provided values for the indicated metric based on the pre-defined units for October through December of the reporting period year. For example, in reporting year 2024, the number of	Numeric ≥ 0, or blank

Field Name	Field Description	Field Value Constraints
	corrections from October through December 2024, that were the result of a correction found in 2021 or more years prior.	
Comments *(utility provided)*	If Inspection_Type or Inspection_Method was "Other," provide details. Provide any additional/other comments, if needed.	Text

2.3.5 Table 5: Vegetation Management

Wildfire Mitigation Data Table 5 ~~include~~includes vegetation management findings and results which took place in the relevant reporting year. This information ~~evaluates~~summarizes vegetation program ~~audits~~actions for the reporting year. Data fields break the inspections, findings, and corrections by Plan_Year_Risk_Designation.

In the absence of certain data elements, Staff will work with the utilities should there be a need to create a "proxy" or approach for estimating requested data while the utility systems evolve to provide the specific data. Provide a brief note in the comments for each attribute explaining the current "proxy" approach and a timeframe for when specific data is planned to be completed. Detailed program evolution may be outlined in the WMP report filing.

Field Name	Field Description	Field Value Constraints
Metric_Type *(pre-defined)*	Overview categorization for input metric. - Vegetation inspection	Restricted to values indicated in Field Description.
Metric_Name *(pre-defined)*	A brief description of the metric based on the Metric_Type categorization. Possible Metric_Names include: - Number of tree inspections - Number of trees requiring trimming - Number of trees requiring removal - Number of completed tree trimming - Number of completed tree removals	Restricted to values indicated in Field Description.
Reporting_Year_Risk_Designation *(pre-populated with utility defined inputs from cover sheet)*	HFRZ areas and relevant sub-categories, if applicable, as defined by the electric utility. Note if n/a and strikethrough it is a result of your utilities unique HFRZ designation being not applicable.	Restricted to values indicated in Field Description.
Line_Type *(pre-defined)*	Transmission or Distribution. Note: Transmission lines refer to all lines at or above 65kV, and distribution lines refer to all lines below 65kV	Restricted to values indicated in Field Description.
Inspection_Type *(pre-defined)*	Inspection Types - Routine non-wildfire - Routine wildfire (i.e., AWRR) - Non-Routine	Restricted to values indicated in Field Description.
Inspection_Method *(pre-defined)*	Inspection Method - Satellite - Ground - LiDAR - Other (provide details in the comment field)	Restricted to values indicated in Field Description.

Field Name	Field Description	Field Value Constraints
Unit(s) *(pre-defined)*	Predefined unit measurements for reporting period metric type. Note only provide details made in the reporting year.	Restricted to values indicated in Field Description.
'Year' Q1-3 *(utility provided results for the reporting period identified on cover sheet)*	Electric utility provided values for the indicated metric based on the pre-defined units for January through September of the reporting period year.	Numeric ≥ 0, or blank
'Year' Q4 *(utility provided results for the reporting period identified on cover sheet)*	Electric utility provided values for the indicated metric based on the pre-defined units for October through December of the reporting period year.	Numeric ≥ 0, or blank
Comments *(utility provided)*	If Inspection_Type or Inspection_Method was "Other," provide details. Provide any additional/other comments, if needed.	Text

2.3.6 Table 6: Performance Metrics

In Table 6, utilities ~~must~~ report any additional internally tracked metrics beyond the request or regulated requirements which are not already requested in the wildfire mitigation template. This ~~table~~worksheet serves as a separate location for utilities to report on any other metrics independently tracked by the electric utility. The record for each additional metric identified by the electric utility ~~must~~shall contain the following:

Field Name	Field Description	Field Value Constraints
Metric *(utility provided)*	Unique identifying electric utility name for the metric.	Text
Definition *(utility provided)*	Electric utility narrative description of the metric and its calculation.	Text
Purpose *(utility provided)*	Electric utility narrative description of how the metric relates to the overall goals of the electrical ~~corporation~~utility wildfire mitigation program.	Text
Assumptions made to connect metric to purpose *(utility provided)*	Electric utility narrative discussion of how the metric accomplishes its purpose.	Text
Third-party validation (if any) *(utility provided)*	Electric utility narrative discussion of independent validation of the metric.	Text
Unit(s) *(utility provided)*	Predefined unit measurements for reporting period metric type.	Text
'Year' *(utility provided results for the reporting period identified on cover sheet)*	Electric utility provided values for the indicated metric based on the pre-defined units for the reporting period year.	Numeric ≥ 0, or blank
Comments *(utility provided)*	Electric utility provided additional/other comments, if needed.	Text

2.3.7 Table 7: ~~Weather~~ Risk Performance

Table 7 ~~evaluates risk~~summarizes risk and performance metrics quarterly over the relative reporting period. The electric utilities shall provide information based on weather patterns significant to fire risk potential~~.~~, such as: Red Flag Warning (RFW~~)~~),[9] ~~;~~ High Wind Warning (HWW~~)~~[8] ~~;~~), [9] and Fire Potential Index (FPI~~) identify weather patterns that~~), which have ~~been shown~~thought to be conducive to ignition and fire spread. Table 7 seeks to isolate system risk events as a result of weather-related events and their occurrence across the non-identified and identified plan year risk designation areas. The table also summarizes system reliability metrics, including and excluding planned events. And finally, the table seeks customer inquiries and complaints for the relevant reporting period.

In the absence of certain data elements, Staff will work with the utilities should there be a need to create a "proxy" or approach for estimating requested data while the utility systems evolve to provide the specific data. Provide a brief note in the comments for each attribute explaining the current "proxy" approach and a timeframe for when specific data is planned to be completed. Detailed program evolution may be outlined in the WMP report filing.

Field Name	Field Description	Field Value Constraints
Metric_Type *(pre-defined)*	Overview categorization for input metric - Risk Events - Utility-related ignitions - Utility reported ignition events - Overhead circuit mile days - General Reliability Metrics	Restricted to values indicated in Field Description.
Metric_Name *(pre-defined)*	A brief description of the metric based on the Metric_Type categorization. Possible Metric_Names include: - Number of ~~all~~unplanned fault events ~~with probability of ignition,~~(forced outages), including wires down, line slap/wire to wire contact, contacts with objects, ~~line slap,~~ events with evidence of heat generation, and other ~~events~~situation that ~~cause sparking or~~ have the potential to ~~cause~~serves as an ignition source. - Number of wires down - Number of outage events not caused by contact with vegetation - Number of outage events caused by contact with vegetation ~~- Number of outage events on circuits with adjusted settings for protective devices enabled.~~ - Number of ignitions - Number of ignitions reported for OAR 860-024-0050 on FM221[10] - Red Flag Warning Only overhead circuit mile days - High Wind Warning Only overhead circuit mile days - Red Flag Watch and High Wind Watch overhead circuit mile day - Fire Potential Index circuit mile days	Restricted to values indicated in Field Description.

[9] Red Flag Warning and High Wind Warning are defined by the National Weather Service; https://mesonet.agron.iastate.edu/request/gis/watchwarn.phtml.

[10] https://secure.sos.state.or.us/oard/viewSingleRule.action?ruleVrsnRsn=301148 and https://www.oregon.gov/puc/forms/Forms%20and%20Reports/Electric-Communication-Incident-Report-Form-FM221.pdf.

Field Name	Field Description	Field Value Constraints
	- Other circuit mile days *(note metric type used in the comment field)* - Number of forced outages on circuits or circuit segments with non-reclosing but not due to active utility work. - Customer hours of interruption due to forced outages on circuits or circuit segments with non-reclosing but not due to active utility work. - Total customer interruptions due to forced outages on circuits or circuit segments with non-reclosing but not due to active utility work. - Number of forced outages on circuits or circuit segments with non-reclosing due to active utility work. - Customer hours of interruption due to forced outages on circuits or circuit segments with non-reclosing due to active utility work. - Total customer interruptions due to forced outages on circuits or circuit segments with non-reclosing due to active utility work. - Number of forced outages on circuits or circuit segments with alternate settings for risk period but not due to active utility work. - Customer hours of interruption due to forced outages on circuits or circuit segments with alternate settings for risk period but not due to active utility work. - Total customer interruptions due to forced outages on circuits or circuit segments with alternate settings for risk period but not due to active utility work. - Number of forced outages on circuits or circuit segments with default settings in place. - Customer hours of interruption due to forced outages on circuits or circuit segments with default settings in place. - Total customer interruptions due to forced outages on circuits or circuit segments with default settings in place. - Number of planned outages on circuits or circuit segments not due to PSPS. - Customer hours of interruption due to planned outages on circuits or circuit segments not due to PSPS. - Total customer interruptions due to planned outages on circuits or circuit segments not due to PSPS. - Number of planned outages on circuits or circuit segments due to PSPS. - Customer hours of interruption due to planned outages on circuits or circuit segments due to PSPS. - Total customer interruptions due to planned outages on circuits or circuit segments due to PSPS. - System Average Interruption Duration Index (SAIDI) (no exclusions, including: PSPS, Planned, and Major Events). - System Average Interruption Frequency Index (SAIFI) (no exclusions, including: PSPS, Planned, and Major Events). - System Average Interruption Duration Index (SAIDI)	

Field Name	Field Description	Field Value Constraints
	(including PSPS and planned, excluding major events). - System Average Interruption Frequency Index (SAIFI) (including PSPS and planned, excluding major events). - System Average Interruption Duration Index (SAIDI) (includes planned, excluding major events and PSPS). - System Average Interruption Frequency Index (SAIFI) (includes planned, excluding major events and PSPS). - System Average Interruption Duration Index (SAIDI) (excludes major events, PSPS, and planned). - System Average Interruption Frequency Index (SAIFI) (excludes major events, PSPS, and planned). - Count of customer reliability inquiries. - Count of customer reliability complaints. - Count of customer OPUC recorded reliability complaints.	
~~Wind~~ Warning_Status *(pre-defined)*	Designation index of Red Flag Warning (RFW), High Wind Warning (HWW), and Fire Potential Index (FPI).	Restricted to values indicated in Field Description.
Reporting_Year_Risk_Designation *(pre-populated with utility defined inputs from cover sheet)*	HFRZ areas and relevant sub-categories, if applicable, as defined by the electric utility. Note if n/a and strikethrough it is a result of your utilities unique HFRZ designation being not applicable.	Restricted to values indicated in Field Description.
Unit(s) *(pre-defined)*	Predefined unit measurements for reporting period metric type. - Number of events subject to Metric_Name - Number of hours subject to Metric_Name - Total number of customers subject to Metric_Name - Number of ignitions - Sum of overhead circuit miles of utility grid subject to Metric_Type, Metric_Name, and Wind_Warning_Status - Customer hours per year subject to Metric_Name - Duration (SAIDI) subject to Metric_Name - Frequency (SAIFI) subject to Metric_Name - Count of customer inquiries or complaints subject to Metric_Name	Restricted to values indicated in Field Description.
'Year'_Q1 *(utility provided results for Q1 of reporting period identified on cover sheet)*	Values for the indicated metric for the first quarter (January through March) of the reporting period year.	Numeric ≥ 0, or blank
'Year'_Q2 *(utility provided results for Q2 of reporting period identified on cover sheet)*	Values for the indicated metric for the second quarter (April through June) of the reporting period year.	Numeric ≥ 0, or blank
'Year'_Q3 *(utility provided results for Q3 of reporting period identified on cover sheet)*	Values for the indicated metric for the third quarter (July through September) of the reporting period year.	Numeric ≥ 0, or blank

Field Name	Field Description	Field Value Constraints
'Year'_Q4 *(utility provided results for Q4 of reporting period identified on cover sheet)*	Values for the indicated metric for the fourth quarter (October through December) of the reporting period year.	Numeric ≥ 0, or blank
Comments *(utility provided)*	If Metric_Name is "Other circuit mile days" then provide a description of the other weather variable used in measuring weather related risk. Provide any additional/other comments, if needed.	Text

2.3.8 Table 8: Risk Event Drivers

Table 8 includes wire down and outage events that are not associated with an ignition. For the purposes of this table, wire down events are any wire down event that ~~did~~may or may not ~~cause~~have caused an unplanned ~~out.~~ outage. Any involuntary/unplanned outage which ~~occurred because of~~ did not result in a downed wire ~~down events~~ should be included in the "Unplanned Outage" ~~"~~portion of the Risk_Event_Category~~".~~. All risk events should include major events and exclude ignition events. Section 3.1 contains a table for possible risk event categories, type, and drivers. Where applicable categories and subcategories were aligned to IEEE 1782-2022; where not available the individual category was retained as a valid entry.

In the absence of certain data elements, Staff will work with the utilities should there be a need to create a "proxy" or approach for estimating requested data while the utility systems evolve to provide the specific data. Provide a brief note in the comments for each attribute explaining the current "proxy" approach and a timeframe for when specific data is planned to be completed. Detailed program evolution may be outlined in the WMP report filing.

Field Name	Field Description	Field Value Constraints
Risk_Event_Category *(pre-defined)*	Overview categorization of the adverse effects from a hazard considering the consequences and frequency of the hazard occurring for the input metric. Data is either considered a wire down event (which did not result in an unplanned outage but may have cause the electric utility to voluntarily de-energize) or an unplanned outage (an event in which asset protection system responded causing an unplanned outage) No ignition occurred. See section 3.1.	Restricted to values indicated in Field Description.
Risk_Event_Type *(pre-defined)*	Outage or event risk classification type for reporting outage category/type. See section 3.1.	Restricted to values indicated in Field Description.
Risk_Event_Driver *(pre-defined)*	Outage or event drivers classifications driver for reporting outage category/type/driver. See section 3.1.	Restricted to values indicated in Field Description.
Line_Type *(pre-defined)*	Transmission or Distribution. Note: Transmission lines refer to all lines at or above 65kV, and distribution lines refer to all lines below 65kV	Restricted to values indicated in Field Description.

Field Name	Field Description	Field Value Constraints
Reporting_Year_Risk_Designation *(pre-populated with utility defined inputs from cover sheet)*	HFRZ areas and relevant sub-categories, if applicable, as defined by the electric utility. Note if n/a and strikethrough it is a result of your utilities unique HFRZ designation being not applicable.	Restricted to values indicated in Field Description.
Unit(s) *(pre-defined)*	Predefined unit measurements for reporting period risk drivers. Number of risk events.	Restricted to values indicated in Field Description.
'Year'_Q1 *(utility provided results for Q1 of reporting period identified on cover sheet)*	Number of risk events for the indicated metric for the first quarter (January through March) of the reporting period year. All risk events should include major events and exclude ignition events.	Numeric ≥ 0, or blank
'Year'_Q2 *(utility provided results for Q2 of reporting period identified on cover sheet)*	Number of risk events for the indicated metric for the second quarter (April through June) of the reporting period year. All risk events should include major events and exclude ignition events.	Numeric ≥ 0, or blank
'Year'_Q3 *(utility provided results for Q3 of reporting period identified on cover sheet)*	Number of risk events for the indicated metric for the third quarter (July through September) of the reporting period year. All risk events should include major events and exclude ignition events.	Numeric ≥ 0, or blank
'Year'_Q4 *(utility provided results for Q4 of reporting period identified on cover sheet)*	Number of risk events for the indicated metric for the fourth quarter (October through December) of the reporting period year. All risk events should include major events and exclude ignition events.	Numeric ≥ 0, or blank
Comments *(utility provided)*	Provide any additional/other comments, if needed.	Text

2.3.9 Table 9: Ignition Events

Table 9 contains ignition data focused on cause based on ignition event driver, event type, line type, and the utilities plan year risk designation. For the purposes of this table, ignition events are to follow the same reporting requirements as OAR 860-024-0050(3)[11] and ~~must~~shall align with FM221 reports. Record events that caused a reportable ignition should not be included in the Table 8: Risk Event Drivers. Section 3.1 contains a table for ignition event types and drivers.

In the absence of certain data elements, Staff will work with the utilities should there be a need to create a "proxy" or approach for estimating requested data while the utility systems evolve to provide the specific data. Provide a brief note in the comments for each attribute explaining the current "proxy" approach and a timeframe for when specific data is planned to be completed. Detailed program evolution may be outlined in the WMP report filing.

Field Name	Field Description	Field Value Constraints
Ignition_Event_Type *(pre-defined)*	Ignition event cause type. See section 3.1.	Restricted to values indicated in Field Description.
Ignition_Event_Driver *(pre-defined)*	Ignition event type/driver. See section 3.1.	Restricted to values indicated in Field Description.

[11] https://secure.sos.state.or.us/oard/viewSingleRule.action?ruleVrsnRsn=301148.

Field Name	Field Description	Field Value Constraints
Line_Type *(pre-defined)*	Transmission or Distribution. Note: Transmission lines refer to all lines at or above 65kV, and distribution lines refer to all lines below 65kV.	Restricted to values indicated in Field Description.
Reporting_Year_Risk_Designation *(pre-populated with utility defined inputs from cover sheet)*	HFRZ areas and relevant sub-categories, if applicable, as defined by the electric utility. Note if n/a and strikethrough it is a result of your utilities unique HFRZ designation being not applicable.	Restricted to values indicated in Field Description.
Unit(s) *(pre-defined)*	Description of units used to measure and report risk metrics. Number of ignitions.	Restricted to values indicated in Field Description.
'Year'_Q1 *(utility provided results for Q1 of reporting period identified on cover sheet)*	Number of ignitions for the indicated metric for the first quarter (January through March) of the reporting period year.	Numeric ≥ 0, or blank
'Year'_Q2 *(utility provided results for Q2 of reporting period identified on cover sheet)*	Number of ignitions for the indicated metric for the second quarter (April through June) of the reporting period year.	Numeric ≥ 0, or blank
'Year'_Q3 *(utility provided results for Q3 of reporting period identified on cover sheet)*	Number of ignitions for the indicated metric for the third quarter (July through September) of the reporting period year.	Numeric ≥ 0, or blank
'Year'_Q4 *(utility provided results for Q4 of reporting period identified on cover sheet)*	Number of ignitions for the indicated metric for the fourth quarter (October through December) of the reporting period year.	Numeric ≥ 0, or blank
Comments *(utility provided)*	Provide any additional/other comments, if needed.	Text

2.3.10 Table 10: Equipment Area Index

Table 10 breaks electric utility equipment and customer counts across the utilities Plan_Year_Risk_ Designation, Urban/Suburban/Rural~~/Highly Rural~~,[12]~~;~~ and Wildland-urban interface (WUI) status.[13]~~.~~ Note that totals for the various Metric_Types ~~must~~shall all be aligned with totals provided in Table 1.

In the absence of certain data elements, Staff will work with the utilities should there be a need to create a "proxy" or approach for estimating requested data while the utility systems evolve to provide the specific data. Provide a brief note in the comments for each attribute explaining the

[12] ~~For purposes of the WMP, "area" is defined as:~~
Per IEEE 1782-2024 3.3 System characterization: Utility circuits (and systems) generally fall into one of the three categories below, which are defined by customer density:
a) Rural (less than 31 customers per circuit kilometer or 50 customers per circuit mile)
b) Suburban (31 to 93 customers per circuit kilometer or 50 to 150 customers per circuit mile)
- c) Urban ~~areas contain a population of~~ (more than ~~1,000 persons per square mile, as determined by the U.S. Bureau of the Census.~~
- ~~Rural areas contain~~

~~Highly Rural, contain a population of less than seven persons per square~~93 customers per circuit kilometer or 150 customers per circuit mile~~, as determined by the United States Bureau of the Census.~~).

[13] WIU is the line, area, or zone where structures and other human development meet or intermingle with undeveloped wildland or vegetation fuels consistent with to OAR 629-044-1011. https://archive-osuwildfireriskmap.forestry.oregonstate.edu/wildland-urban-interface.

current "proxy" approach and a timeframe for when specific data is planned to be completed. Detailed program evolution may be outlined in the WMP report filing.

Field Name	Field Description	Field Value Constraints
Metric_Type *(pre-defined)*	Overview categorization for input metric. - Overhead circuit miles - Underground circuit miles - Critical facilities - Residential customers - Commercial customers - Medical vulnerable customers - Substations - Weather stations - Cameras	Restricted to values indicated in Field Description.
Line_Type *(pre-defined)*	Transmission or Distribution. Note: Transmission lines refer to all lines at or above 65kV, and distribution lines refer to all lines below 65kV.	Restricted to values indicated in Field Description.
Reporting_Year_Risk_Designation *(pre-populated with utility defined inputs from cover sheet)*	HFRZ areas and relevant sub-categories, if applicable, as defined by the electric utility. Note if n/a and strikethrough it is a result of your utilities unique HFRZ designation being not applicable.	Restricted to values indicated in Field Description.
Area_Type *(pre-defined)*	Area type is based on ~~census tract boundary populations~~System characterization[13] - ~~Urban (over 1,000 persons per square mile)~~ - ~~Rural (1,000 or less persons per square mile)~~ - ~~Highly rural (7 or less persons per square mile)~~Rural - Suburban - Urban	Restricted to values indicated in Field Description.
WUI_Status *(pre-defined)*	Wildland urban interface - WUI - Non-WUI	Restricted to values indicated in Field Description.
Unit(s) *(pre-defined)*	Predefined unit measurements for reporting period metric type. - Circuit miles - Number of Metric_Type	Restricted to values indicated in Field Description.
'Year' *(utility provided results for the reporting period identified on cover sheet)*	Electric utility provided values for the indicated metric based on the pre-defined units for the reporting period year.	Numeric ≥ 0, or blank
Comments *(utility provided)*	Electric utility provided additional/other comments, if needed.	Text

2.3.11 Table 11: Equipment Area Index Changes

Table 11 identifies any additions, removals, or upgrades to electric utility equipment across the utilities Plan_Year_Risk_ Designation, Urban/Suburban/Rural~~/Highly Rural[2]~~,[13] and Wildland-urban interface (WUI) ~~status[3]~~.status.[14]

In the absence of certain data elements, Staff will work with the utilities should there be a need to create a "proxy" or approach for estimating requested data while the utility systems evolve to provide the specific data. Provide a brief note in the comments for each attribute explaining the

current "proxy" approach and a timeframe for when specific data is planned to be completed. Detailed program evolution may be outlined in the WMP report filing.

Field Name	Field Description	Field Value Constraints
Metric_Type *(pre-defined)*	Overview categorization for input metric. - Overhead circuit miles - Underground circuit miles - Substations - Weather stations - Cameras	Restricted to values indicated in Field Description.
Line_Type *(pre-defined)*	Transmission or Distribution. Note: Transmission lines refer to all lines at or above 65kV, and distribution lines refer to all lines below 65kV.	Restricted to values indicated in Field Description.
Reporting_Year_Risk_Designation *(pre-populated with utility defined inputs from cover sheet)*	HFRZ areas and relevant sub-categories, if applicable, as defined by the electric utility. Note if n/a and strikethrough it is a result of your utilities unique HFRZ designation being not applicable.	Restricted to values indicated in Field Description.
Area_Type *(pre-defined)*	Area type is based on ~~census tract boundary populations~~System characterization[13] ~~- Urban (over 1,000 persons per square mile)~~ ~~- Rural (1,000 or less persons per square mile)~~ ~~- Highly rural (7 or less persons per square mile)~~Rural - Suburban - Urban	Restricted to values indicated in Field Description.
WUI_Status *(pre-defined)*	Wildland urban interface - WUI - Non-WUI	Restricted to values indicated in Field Description.
Unit(s) *(pre-defined)*	Predefined unit measurements for reporting period metric type. - Circuit miles - Number of Metric_Type	~~T~~Restricted to values indicated in Field Description.
'Year+1'_Additions *(utility provided results for the reporting period identified on cover sheet)*	Electric utility provided planned additions for the following reporting year based on Area_Type and WUI_Status for the indicated metric.	Numeric ≥ 0, or blank
'Year+1'_Removals *(utility provided results for the reporting period identified on cover sheet)*	Electric utility provided planned removals for the following reporting year based on Area_Type and WUI_Status for the indicated metric.	Numeric ≥ 0, or blank
'Year+1'_Upgrades *(utility provided results for the reporting period identified on cover sheet)*	Electric utility provided Planned upgrades for the following reporting year based on Area_Type and WUI_Status for the indicated metric.	Numeric ≥ 0, or blank
Comments *(utility provided)*	Electric utility provided additional/other comments, if needed.	Text

2.3.12 Table 12: De-energization and PSPS Metrics

In Table 12, utilities ~~must~~shall report on specified De-energization and PSPS related metrics for the reporting year. These include unit metrics such as number outage events, affect circuit mile days, customer hours out and number of customers affected. Where overlap occurs the

reported actuals ~~must~~shall align with previously submitted data unless corrections are needed due to errors identified in previous submissions.

In the absence of certain data elements, Staff will work with the utilities should there be a need to create a "proxy" or approach for estimating requested data while the utility systems evolve to provide the specific data. Provide a brief note in the comments for each attribute explaining the current "proxy" approach and a timeframe for when specific data is planned to be completed. Detailed program evolution may be outlined in the WMP report filing.

Field Name	Field Description	Field Value Constraints
Metric_Type *(pre-defined)*	Overview categorization for input metric. - Sensitive settings - Proximity utility encroachment de-energizations - Proximity dictated FS requested de-energization - Public safety power shutoff - ~~Proximity dictated FS requested de-energization~~ - ~~General Reliability Metrics~~ -	Restricted to values indicated in Field Description.
Metric_Name *(pre-defined)*	A brief description of the metric based on the Metric_Type categorization. Possible Metric_Names: - Frequency of Metric_Type - Circuit mile days of Metric_Type - Scope of Metric_Type - Duration of Metric_Type - Customer experiencing of Metric_Type - ~~Customer hours out~~ - SAIDI of Metric_Type - SAIFI of Metric_Type - CAIDI of Metric_Type - Critical Infrastructure impacted by PSPS	Restricted to values indicated in Field Description.
Wind_Warning_Status *(pre-defined)*	Designation index of - Red Flag Warning (RFW) - High Wind Warning (HWW) - RFW & HWW - All (regardless of RFW/HWW status) - N/A	Restricted to values indicated in Field Description.
Reporting_Year_Risk_Designation *(pre-populated with utility defined inputs from cover sheet)*	HFRZ areas and relevant sub-categories, if applicable, as defined by the electric utility. Note if n/a and strikethrough it is a result of your utilities unique HFRZ designation being not applicable.	Restricted to values indicated in Field Description.
Unit(s) *(pre-defined)*	Predefined unit measurements for reporting period metric type. - Number of outages - Circuit mile days - Number of instances where utility operating protocol requires de-energization of a circuit or portion thereof to reduce ignition probability, per year; an event is one occurrence that can include multiple zones beginning at the same time and date - Circuit-events, measured in number of events multiplied by number of circuits de-energized per year; an event is one occurrence that can include multiple zones beginning at the same time - Customer hours per year (Customer count * Minutes out)	Restricted to values indicated in Field Description.

Field Name	Field Description	Field Value Constraints
	- Total Customers experiencing Metric_Name - Minutes (SAIDI, CAIDI) - Frequency (SAIFI) - Number of critical infrastructure locations impacted per hour multiplied by hours offline per year	
'Year' Q1-3 *(utility provided results for the reporting period identified on cover sheet)*	Electric utility provided values for the indicated metric based on the pre-defined units for January through September of the reporting period year.	Numeric ≥ 0, or blank
'Year' Q4 *(utility provided results for the reporting period identified on cover sheet)*	Electric utility provided values for the indicated metric based on the pre-defined units for October through December of the reporting period year.	Numeric ≥ 0, or blank
Comments *(utility provided)*	Provide any additional/other comments, if needed.	Text

2.3.13 Table 13: Mitigation Initiative Targets

In Table 13, the electric utility ~~must~~shall provide a summary of the actual and projected costs of initiative activities. For each initiative category and activity, the electric utility ~~must~~will report total units and expenditures by type, as either capital expenditure (Capital) or operations and maintenance expenditure (O & M). Results shall also be broken out by Plan_Year_Risk_Designation. In cases where indicated the OPUC is interested in only system cost for the initiative. Unit totals ~~must~~shall have an identified unit of measurement, while expenditure totals must be reported in thousands of dollars. Utilities shall provide ~~pervious~~previous year actuals, reporting year projection and actual, and projected targets for the reporting period of totals for units and spend. Details and programs identified in this table ~~must~~shall correlate and align to the electric utilities' initiative programs provided in Table 2. A Summary of mitigation categories and activities can be found in section 3.2.

Field Name	Field Description	Field Value Constraints
Initiative_Category *(pre-defined)*	The WMP Initiative Category under which the subject WMP Initiative Activity is organized. An overview of Initiative Categories ~~are~~is found in section 3.2.	Restricted to values indicated in Field Description.
WMP_Initiative_Activity *(pre-defined)*	The name of the subject WMP Initiative Activity, as provided by OPUC. An overview of Initiative Category-Activities ~~are~~is found in section 3.2. If this value is "Other," provide the Initiative Activity name in the Comments.	Restricted to values indicated in Field Description.
Expense_Type	Electric utility expenditure source/allocation. - Capital - O & M	Restricted to values indicated in Field Description.
Area_of_Application *(pre-populated with utility defined inputs from cover sheet and pre-defined dropdown)*	If blank, select 'System' or 'Oregon Allocated' (reference section 3.2 for applicable initiative category activities). If applicable initiative category activities are not blank align with the relevant HFRZ areas and/or sub-categories, as defined by the electric utility on the cover sheet.	Restricted to values indicated in Field Description.

Field Name	Field Description	Field Value Constraints
	Note if n/a and strikethrough it is a result of your utilities unique HFRZ designation being not applicable.	
Program_Provisioner *(pre-defined dropdown)*	Select from the dropdown options: - Contractor - Company - Both - Outsourced	Restricted to values indicated in Field Description.
Geographic_Designation_ID(s)-if_multiple_separate_by_semi-colon *(utility provided)*	Provide the Geographic Designations number as defined in the Cover Sheet of the workbook.	Text
Utility_Initiative_Tracking_ID *(utility provided)*	The "Utility Initiative Tracking ID" is the unique tracking ID for a given initiative activity. This ID must match the "Utility Initiative Tracking ID" field for the same initiative activity in all data submissions for the initiative's entire lifecycle and must link with Utility_Intiative_Tracking_ID in Table 2.	Text
Primary_Driver_Targeted *(pre-defined dropdown)*	Primary risk driver component / outcome metric which is expected to be impacted by the initiative activity. A summary of risk drivers can be found in section 3.1 Risk and Ignition Event Table.	Restricted to values indicated in Field Description.
Secondary_Driver_Targeted *(pre-defined dropdown)*	Secondary risk driver component / outcome metric which is expected to be impacted by the initiative activity. A summary of risk drivers can be found in section 3.1 Risk and Ignition Event Table.	Restricted to values indicated in Field Description.
Year_Intiated *(utility provided)*	Year Initiative program began.	Text (YYYY)
Funding_Source *(pre-defined dropdown)*	Programing funding source: - GRCAAC - Deferral/Amortization - Grant - Other cost recovery - Combined	Restricted to values indicated in Field Description.
Funding_Source_Order,_Funder,_ Other *(utility provided)*	Provide funding source details -If authorized through Commission docket provide order -If not, provide funder name	Text
If_Proposed_Program(Y/N) *(pre-defined dropdown)*	Program proposal: - Y - N	Restricted to values indicated in Field Description.
Relevant_regulation(s)-if multiple_separate_by_semi-colon *(utility provided)*	Reference OARs related to initiative	Text
Current_Compliance_Status *(pre-defined dropdown)*	Electric utility assessment of in compliance/ exceeding compliance with regulations: - In - Exceeding - N/A	Restricted to values indicated in Field Description.

Field Name	Field Description	Field Value Constraints
Non-disaggregated_Spend *(utility provided)*	If spend not disaggregated by initiative activity, note initiative category for the spend or mark general operations.	Text
Unit_Measurement *(pre-defined dropdown)*	Select from dropdown the applicable predefined unit measurements for reporting period. Based on previous tables. - # of acres - # of assets - # of cameras - # of cameras (AI detection) - # of critical facilities - # of customers belonging to medically vulnerable populations - # of customers commercial - # of customers residential - # of customers total - # of days - # of events - # of hours - # of ignitions - # of incidents - # of linear miles - # of meetings - # of meters - # of minutes - # of outages - # of risk events - # of structures - # of substations - # of weather stations - N/A - Other	Restricted to values indicated in Field Description.
'Year-1'_Actual_Units *(utility provided)*	Actual electric utility total completed units for the reporting period year -1.	Numeric ≥ 0, or blank
'Year-1'_Actual_$ *(utility provided)*	Actual electric utility total expenditure for the reporting period year - 1. Must be reported in thousands of dollars.	Numeric ≥ 0, or blank
'Year'_Projected_Units *(utility provided)*	Electric utility projected units for the reporting period year.	Numeric ≥ 0, or blank
'Year'_Projected_$ *(utility provided)*	Electric utility projected expenditure for the reporting period year. Must be reported in thousands of dollars.	Numeric ≥ 0, or blank
'Year'_Actual_Units *(utility provided)*	Actual electric utility total completed units for the reporting period year.	Numeric ≥ 0, or blank
'Year'_Actual_$ *(utility provided)*	Actual electric utility total expenditure for the reporting period year. Must be reported in thousands of dollars.	Numeric ≥ 0, or blank
'Year'_Projected_Units_for_'Year +1' *(utility provided)*	Electric utility projected units for the reporting period year +1.	Numeric ≥ 0, or blank
'Year'_Projected_$_for_'Year+1' *(utility provided)*	Electric utility projected expenditure for the reporting period year +1. Must be reported in thousands of dollars.	Numeric ≥ 0, or blank

Field Name	Field Description	Field Value Constraints
'Year'_Projected_Units_for_'Year +2' *(utility provided)*	Electric utility projected units for the reporting period year +2.	Numeric ≥ 0, or blank
'Year'_Projected_$_for_'Year+2' *(utility provided)*	Electric utility projected expenditure for the reporting period year + 2. Must be reported in thousands of dollars.	Numeric ≥ 0, or blank
'Year'_Projected_Units_for_Year +3' *(utility provided)*	Electric utility projected units for the reporting period year +3.	Numeric ≥ 0, or blank
'Year'_Projected_$_for_'Year+3' *(utility provided)*	Electric utility projected expenditure for the reporting period year +3. Must be reported in thousands of dollars.	Numeric ≥ 0, or blank
Comments *(utility provided)*	Provide any additional/other comments if needed. Comments must be added if WMP_Initiative_Category is "Other"".	Text

3 Risk and Ignition Event Categorizations

3.1 Risk and Ignition Event Table

While there is overlap between risk (Table 8) and ignition (Table 9) event types, there are slight variations noted in the table below. The below table provides a reference guide for event categories and ~~there~~their risk or ignition type and driver classifications. Where applicable categories and subcategories aligned to IEEE 1782-2022; where not available the individual category was retained as a valid entry.

Risk Event Category	Risk / Ignition Event Type (~~IEEE 1782-2022 -~~ Category)	Risk Event Driver (~~IEEE 1782-2022 -~~ Subcategory)	Ignition Event Driver (~~IEEE 1782-2022 -~~ Subcategory)
Wire Down Event or Unplanned Outage	Contamination	Contamination	Contamination
	Equipment	Degradation-Structural Elements Degradation-Line Element Degradation-Protective/Control Device Degradation-Voltage Control Degradation-Other Degradation-Unknown	Degradation-Structural Elements Degradation-Line Element Degradation-Protective/Control Device Degradation-Voltage Control Degradation-Other Degradation-Unknown
		Equipment Error-Structural Elements Equipment Error-Line Element Equipment Error-Protective/Control Device Equipment Error-Voltage Control Equipment Error-Other Equipment Error-Unknown	Equipment Error-Structural Elements Equipment Error-Line Element Equipment Error-Protective/Control Device Equipment Error-Voltage Control Equipment Error-Other Equipment Error-Unknown
		Environmental-Structural Elements Environmental-Line Element Environmental-Protective/Control Device Environmental-Voltage Control Environmental-Other Environmental-Unknown	Environmental-Structural Elements Environmental-Line Element Environmental-Protective/Control Device Environmental-Voltage Control Environmental-Other Environmental-Unknown
		Other-Structural Elements Other-Line Element Other-Protective/Control Device Other-Voltage Control Other-Other	Other-Structural Elements Other-Line Element Other-Protective/Control Device Other-Voltage Control Other-Other

Risk Event Category	Risk / Ignition Event Type (~~IEEE 1782-2022 -~~ Category)	Risk Event Driver (~~IEEE 1782-2022 -~~ Subcategory)	Ignition Event Driver (~~IEEE 1782-2022 -~~ Subcategory)
		Other-Unknown	Other-Unknown
	Fire	Fire	n/a
	Lightning	Direct Strike Lightning	Direct Strike Lightning
	Public Contact	Dig-in Fire/Police Foreign Contact-3rd party contact Foreign Contact-Aircraft vehicle contact Foreign Contact-Balloon contact Foreign Contact-Land vehicle contact Foreign Contact-Vandalism/theft Other	Dig-in Fire/Police Foreign Contact-3rd party contact Foreign Contact-Aircraft vehicle contact Foreign Contact-Balloon contact Foreign Contact-Land vehicle contact Foreign Contact-Vandalism/theft Other
	Wildlife Contact	Mammal Bird Reptile/Amphibian Other/Unknown	Mammal Bird Reptile/Amphibian Other/Unknown
	Other	Utility Error/Other	Utility Error/Other
	Unknown	Unknown	Unknown
	Vegetation	Outside Clearance Zone Within Clearance Zone (right-of-way) Other	Outside Clearance Zone Within Clearance Zone (right-of-way) Other
	Wire-to-wire contact	Wire-to-wire contact	Wire-to-wire contact
Additional Unplanned Outage Categories	Customer request	Customer request	n/a
	Emergency repairs	Emergency repairs	n/a
	Government agency request	Government agency request	n/a
-	~~Protective device operation~~	~~n/a~~	~~Protective device operation~~

3.2 Mitigation Categories and Activities

The table below outlines various mitigation initiative categories and ~~there~~their subsequent initiative activities.

Initiative Category	Initiative Activity	Utility must select System/Oregon Allocated
Community Outreach and Public Awareness	• Best Practice sharing with other utilities	X
	• Collaboration on local wildfire mitigation planning	X
	• Engagement with access and functional needs populations or environmental justice communities	X
	• WMP engagement, outreach, and education awareness program	X
	• Community Outreach and Engagement-Performance monitoring	X
	• Community Outreach and Engagement-Other	X
PSPS / Emergency Preparedness	• Customer support in wildfire emergencies and PSPS	X
	• Protocol for de-energization preparedness plan or emergency preparedness plan	X
	• Public Safety Partner collaboration and coordination	X
	• Preparedness and planning for service restoration	X
	• PSPS & Public emergency communication strategy	X
	• Public safety portal	X
	• Battery Programs	X
	• Community Resource Centers	X
	• PSPS & Emergency Preparedness-Performance monitoring	X
	• PSPS & Emergency Preparedness-Other	X
Industry Engagement	• Participation in forums / sharing industry best practices or learnings	X
	• Research and analysis to maintain expertise on emerging technologies/ practices	X
Overview of the Service Territory	• Environmental compliance and permitting	X
	• Overview of the Service Territory-Performance monitoring	X
	• Overview of the Service Territory-Other	X
Risk Methodology and Assessment	• Risk Methodology and Assessment	X
	• Risk Methodology and Assessment-Performance monitoring	X
	• Risk Methodology and Assessment-Other	X
Wildfire Mitigation Strategy Development	• Wildfire Mitigation Strategy Development (project management and plan document development)	
	• Wildfire Mitigation Strategy Development-Performance monitoring	
	• Wildfire Mitigation Strategy Development-Other	
Grid Design and System Hardening	• Covered conductor installation (Tree Wire)	
	• Distribution pole replacements and reinforcements	
	• Emerging grid hardening technology installations and pilots	

Initiative Category	Initiative Activity	Utility must select System/Oregon Allocated
	• Installation of system automation equipment • Installation of system monitoring equipment (CFCI) • Microgrids • Other grid topology improvements to minimize risk of ignitions • Other grid topology improvements to mitigate or reduce PSPS events • Other technologies and systems not listed above • Quality assurance / quality control • Spacer Cable installation • Traditional overhead hardening • Transmission pole/tower replacements and reinforcements • Undergrounding of electric lines and/or equipment • Grid Design and System Hardening—Performance monitoring • Grid Design and System Hardening—Other	
Grid Operations and Protocols	• Equipment Settings to Reduce Wildfire Risk (Grid Ops) • Grid Response Procedures and Notifications (Grid Ops) • Other technologies and systems not listed above • Personnel Work Procedures and Training in Conditions of Elevated Fire Risk (Grid Ops) • Quality assurance / quality control • Grid Operations and Protocols—Performance monitoring • Grid Operations and Protocols—Other	
Inspect/Correct	• Asset Inspections • Asset Management and Inspection/Correction Enterprise Systems • Fire season safety patrols • Correction—Heightened Fire Risk • Correction—Imminent Danger • Correction—Occupant Violation • Correction—Other Div. 24 Correction • Heightened risk of fire ignition corrections • Ignition prevention inspection • Ignition prevention inspection—Occupant violation • Imminent danger corrections • Occupant violation correction • Removal or permanent de-energization of equipment • Quality control / performance monitoring • Inspect/Correct—Other	
	• Environmental monitoring systems • Fire potential index	

Initiative Category	Initiative Activity	Utility must select System/Oregon Allocated
Situational Awareness and Forecasting	• Grid monitoring systems • Ignition detection systems • Near-term Risk Modeling • Weather forecasting • Situational Awareness and Forecasting-Performance monitoring • Situational Awareness and Forecasting-Other	
Vegetation Management	• Clearance • Emergency response vegetation management • Fall-in mitigation • Fire-resilient right-of-ways • High-risk species • Pole clearing • Quality assurance / quality control • Substation defensible space • Vegetation Imagery (LiDAR, Satellite) • Vegetation Inspections • Vegetation management enterprise system • Wood and slash management • Vegetation Management—Performance monitoring • Vegetation Management—Other	
Other	• See "Activity_Name_if_Other" Column	

Appendix A: Definitions

Term	Definition
Asset (utility)	Electric lines, equipment, or supporting hardware.
Circuit miles	The total length in miles of separate transmission and/or distribution circuits, regardless of the number of conductors used per circuit (i.e., different phases).
Consequence	The adverse effects from an event, considering the hazard intensity, community exposure, and local vulnerability.
Contact by object ignition likelihood	The likelihood that a non-vegetative object (such as a balloon or vehicle) may contact utility-owned equipment and result in an ignition.
Contact by vegetation ignition likelihood	The likelihood that vegetation may contact utility-owned equipment and result in an ignition.
Contractor	Any individual in the temporary and/or indirect employ of the electrical utility whose limited hours and/or time-bound term of employment are not considered “full-time” for tax and/or any other purposes.

Term	Definition
Critical facilities and infrastructure	Facilities and infrastructure that are essential to public safety and that require additional assistance and advance planning to ensure resiliency during PSPS events. These include the following: Emergency services sector: · Police stations · Fire stations · Emergency operations centers · Public safety answering points (e.g., 9-1-1 emergency services) Government facilities sector: · Schools · Jails and prisons Health care and public health sector: · Public health departments · Medical facilities, including hospitals, skilled nursing facilities, nursing homes, blood banks, health care facilities, dialysis centers, and hospice facilities (excluding doctors' offices and other non-essential medical facilities) Energy sector: · Public and private utility facilities vital to maintaining or restoring normal service, including, but not limited to, interconnected publicly owned electrical utilities and electric cooperatives Water and wastewater systems sector: · Facilities associated with provision of drinking water or processing of wastewater, including facilities that pump, divert, transport, store, treat, and deliver water or wastewater Communications sector: · Communication carrier infrastructure, including selective routers, central offices, head ends, cellular switches, remote terminals, and cellular sites Chemical sector: · Facilities associated with manufacturing, maintaining, or distributing hazardous materials and chemicals Transportation sector: · Facilities associated with transportation for civilian and military purposes: automotive, rail, aviation, maritime, or major public transportation
Customer hours	Sum of customer minutes of interruption divided by 60 (e.g., of power outage).
Detailed inspection	Detailed inspections include, but are not limited to, visual checks, pole test and treat programs (only required for pole Owners), or practical tests of all facilities, to the extent required to identify violations of Commission Safety Rules. Where facilities are exposed to extraordinary conditions (including High Fires Risk Zones) or when an Operator has demonstrated a pattern of non-compliance with Commission Safety Rules, the Commission may require a shorter interval between inspections. OAR 860-024-0011(1)(A).
Distribution Line	Distribution lines refer to all lines below 65kV.
Electrical utility	Every corporation or person owning, controlling, operating, or managing any electric plant for compensation within Oregon. “Reporting Operator” means an Operator that serves 20 customers or more within Oregon.

Term	Definition
Emergency	Any incident, whether natural, technological, or human caused, that requires responsive action to protect life or property but does not result in serious disruption of the functioning of a community or society. (FEMA/UNDRR.)
Equipment ignition likelihood	The likelihood that utility-owned equipment will cause an ignition through either normal operation (such as arcing) or failure.
Exercise	An instrument to train for, assess, practice, and improve performance in prevention, protection, response, and recovery capabilities in a risk-free environment. (FEMA.)
Exposure	The presence of people, infrastructure, livelihoods, environmental services and resources, and other high-value assets in places that could be adversely affected by a hazard.
Fire	A sustained chemical reaction that occurs when fuel, oxygen, and heat come together in an exothermic reaction. A fire can go through several stages, including growth, fully developed, and decay. Ignition is the process of starting a fire, while fire is the sustained chemical reaction that occurs when fuel, oxygen, and heat join together.
Fire Potential Index (FPI)	Landscape scale index used as a proxy for assessing real-time risk of a wildfire under current and forecasted weather conditions.
Fire season	The time of year when wildfires are most likely for a given geographic region due to historical weather conditions, vegetative characteristics, and impacts of climate change. Each electrical corporation defines the fire season(s) across its service territory based on a recognized fire agency definition for the specific region(s).
Frequency	The anticipated number of occurrences of an event or hazard over time.
Frequent PSPS events	More than one PSPS event per calendar year per line circuit.
Geographical Designated Area (ID and Name)	Geographic Designated Areas represent geographical subareas which the utility identifies as having a level of fire risk above non-HFRZ (including areas of interest). The geographical areas are often contained within a single boundary/polygon or a localized grouping of areas. These areas may highlight specific area mitigation projects based on risk analysis for the given location. Examples of previous Geographical Designated Areas provided in utility filed WMPs include Idaho Power Company's (Austin Junction, OR, or Halfway, OR), PacifiCorp's (Hood River, Roseburg), Portland General Electric's (Zone 1, or Zone 5).
Goals	The electrical corporation's general intentions and ambitions.
Grid hardening	Actions (such as equipment upgrades, maintenance, and planning for more resilient infrastructure) taken in response to the risk of undesirable events (such as outages) or undesirable conditions of the electrical system to reduce or mitigate those events and conditions, informed by an assessment of the relevant risk drivers or factors.

Term	Definition
Grid topology	General design of an electric grid, whether looped or radial, with consequences for reliability and ability to support PSPS (e.g., ability to deliver electricity from an additional source).
Hazard	A condition, situation, or behavior that presents the potential for harm or damage to people, property, the environment, or other valued resources.
High Fire Risk Zone (HFRZ)	"High Fire Risk Zones" or "HFRZ" are geographic areas identified by Operators of electric facilities in their risk-based wildfire plans. Each IOU has it's on naming convention for these areas. IPC= Tier 2 (YRZ) and Tier 3 (RRY), PAC=FHCA, PGE=HFRZ. OAR 860-024-0018.
HFRZ Ignition Prevention Inspection	An inspection that identifies potential sources of electrical ignition on any utility pole, structure, duct, or conduit owned by either the Owner or an Occupant in a High Fire Risk Zone. The inspection can be combined with other safety or detailed inspections as required by rule. OAR 860-024-0001.
High Wind Warning Only (HWW Only)	Used in the WMP Data Template Workbook to indicate that a High Wind Warning was the only wind status in effect at a given time and location.
High Wind Warning and Red Flag Warning (HWW & RFW)	Used in the WMP Data Template Workbook to indicate that a High Wind Warning and a Red Flag Warning were both in effect at a given time and location.
HFRZ- Sub-area	If the reporting utility has more than one subarea distinction for levels of Wildfire Risk. (For example, yellow and red risk zones, Tier 1 or Tier 2, or HFRZ and area of interest.)
HFRZ Zone ID	To identify specific utility defined HFRZ zones. Zones are typically HFRZ areas specific to a select geographic location. (For example, Oregon City, Medford, Halfway, Zone 1.)
High-risk species	Species of vegetation that (1) have a higher risk of either coming into contact with powerlines or causing an outage or ignition, or (2) are easily ignitable and within close proximity to potential arcing, sparks, and/or other utility equipment thermal failures. The status of species as "high-risk" must be a function of species-specific characteristics including growth rate, failure rates of limbs, trunk, and/or roots (as compared to other species), height at maturity, flammability, and vulnerability to disease or insects.
High Wind Warning (HWW)	Issued for the expectation of sustained wind of 40 to 57 mph or higher for ≥2 hours within a 12 hour period, or for any non-convective gust to 58 mph within a 12 hour period. This includes issuance for structural/natural damage from said winds. Generally issued within 12 to 24 hours of causative event.[14]

[14] https://www.weather.gov/bro/mapcolors#:~:text=HW.W,within%20a%2012%20hour%20period.

Term	Definition
HWW Only/Overhead (OH) circuit mile day	Used in the WMP Data Template Workbook to indicate that a High Wind Warning was the only wind status in effect at a given time and location. Sum of OH circuit miles of utility grid subject to a HWW each day within a given time period, calculated as the number of OH circuit miles under a HWW multiplied by the number of days those miles are under said HWW. For example, if 100 OH circuit miles are under a HWW for one day, and 10 of those miles are under the HWW for an additional day, then the total HWW OH circuit mile days would be 110.
Ignition	The process of starting combustion or catching fire. Ignition can be caused by an external heat source, such as a spark, pilot flame, or hot surface. The fuel and air must reach a certain temperature, known as the ignition temperature, for the combustion reaction to occur.
Ignition likelihood	The total anticipated annualized number of ignitions resulting from utility-owned assets at each location in the electrical utility's service territory. This considers probabilistic weather conditions, type and age of equipment, and potential contact of vegetation and other objects with utility assets.
Ignition prevention findings	A violation of Commission Safety Rules which poses a risk of fire ignition identified by an HFRZ Ignition Prevention Inspection or safety patrol in an HFRZ shall be subject to the following correction timeframes: (a) Any violation that poses imminent danger to life or property must be repaired, disconnected, or isolated by the Operator immediately after discovery. If in doing so, the Operator disconnected or isolated equipment belonging to a third-party, the Operator will notify the equipment Owner as soon as practicable, (b) Any violation which correlates to a heightened risk of fire ignition shall be corrected no later than 180 days after discovery unless an occupant receives notification under OAR 860-028-0120(6) that the violation must be corrected in less than 180 days to alleviate a significant safety risk to any operator's employees or a potential risk to the general public. When an inspection or safety patrol in an HRFZ poses imminent danger to life or property it must be repaired, disconnected, or isolated by the Operator immediately after discovery. If in doing so, the Operator disconnected or isolated equipment belonging to a third-party, the Operator will notify the equipment Owner as soon as practicable. OAR 860-024-0018(5)(b).
Ignition probability	The relative possibility that an ignition will occur, quantified as a number between zero percent (impossibility) and 100 percent (certainty). The higher the probability of an event, the more certainty there is that the event will occur. (Often informally referred to as likelihood or chance.)
Ignition risk	The total anticipated annualized impacts from ignitions at a specific location. This considers the likelihood that an ignition will occur, the likelihood the ignition will transition into a wildfire, and the potential consequences—considering hazard intensity, exposure potential, and vulnerability—the wildfire will have on each community it reaches.
Initiative	Measure or activity, either proposed or in process, designed to reduce the consequences and/or probability of wildfire or PSPS.

Term	Definition
Tree Attachment	Utility supply conductors shall not be attached to trees and should only be attached to poles and structures designed to meet the strength and loading requirements of the National Electrical Safety Code. This section does not apply to customer-supplied equipment at the point of delivery. Compliance with this section must be achieved prior to December 31, 2027. OAR 860-240-0018(2).
Line miles	The number of miles of transmission and/or distribution conductors, including the parallel length of each phase and conductor segment.
Medically Vulnerable Customers	A medically vulnerable customer is a person who is critically dependent on electrically powered equipment. This includes but may not be limited to life protecting devices, assistive technologies to support independent living, and medical equipment of those who are particularly vulnerable due to advanced age or physical, sensory, intellectual, or mental health.
Mitigation	Activities to reduce the loss of life and property from natural and/or human-caused disasters by avoiding or lessening the impact of a disaster and providing value to the public by creating safer communities.
Non-HFRZ	An area that is not designated as a HFRZ.
Non-routine	Vegetation management removal or treatment programs conducted as non-cycle work, not generally associated with clearance compliance with OAR 860-024-0016.
Other Risk Category	Risk category used by some electric utilities to define an area that is not identified as a HFRZ; however, the utility has deemed the area with some fire risk beyond the Non-HFRZ classification. These areas may signify areas in which the utility feels it is necessary to provide some wildfire mitigation work.
Patrol inspection	An Operator of electric supply facilities or an Operator of communication facilities must: (a) Construct, operate, and maintain its facilities in compliance with the Commission Safety Rules; and (b) Conduct detailed inspections of its overhead facilities to identify violations of the Commission Safety Rules. OAR 860-024-0111(1).
Performance metric	A quantifiable measurement that is used by an electrical corporation to indicate the extent to which its WMP is driving performance outcomes.
Preparedness	A continuous cycle of planning, organizing, training, equipping, exercising, evaluating, and taking corrective action in an effort to ensure effective coordination during incident response. Within the NIMS, preparedness focuses on planning, procedures and protocols, training and exercises, personnel qualification and certification, and equipment certification.
Priority A findings	A violation of the Commission Safety Rules that poses an imminent danger to life or property must be repaired, disconnected, or isolated by the Operator immediately after discovery. Immediate Hazard, Priority A, OAR 860-024-0012(1).
Priority B findings	The Operator must correct violations of Commission Safety Rules no later than two years after discovery. Two Year Correction, Priority B,

Term	Definition
	OAR 860-024-0012(2).
Priority C findings	An Operator may elect to defer correction of violations of the Commission Safety Rules that pose little or no foreseeable risk of danger to life or property to correction during the next major work activity. (a) In no event shall a deferral under this section extend for more than ten years after discovery. Deferral, Priority C, OAR 860-024-0012(3)(a).
Property	Private and public property, buildings and structures, infrastructure, and other items of value that may be destroyed by wildfire, including both third-party property and utility assets.
Protective equipment and device settings	The electrical corporation's procedures for adjusting the sensitivity of grid elements to reduce wildfire risk, other than automatic reclosers (such as circuit breakers, switches, etc.) For example, "sensitive settings".
PSPS event	A proactive de-energization of a portion of a Public Utility's electrical network, based on the forecasting of and measurement of extreme wildfire weather conditions. The period from notification of the first public safety partner of a planned public safety PSPS to re-energization of the final customer.
PSPS likelihood	The likelihood of a PSPS being required by a utility given a probabilistic set of environmental conditions.
Red Flag Warning (RFW)	Issued for conditions conducive to rapid or explosive growth of any wildfire that develops. Normally issued within 24 hours of expected occurrence. Red Flag Warnings are not issued for the probability of wildfire to start.[15,16]
RFW Only/OH circuit mile day	Used in the WMP Data Template Workbook to indicate that a Red Flag Warning was the only wind status in effect at a given time and location. Sum of OH circuit miles of utility grid subject to RFW each day within a given time period, calculated as the number of OH circuit miles under RFW multiplied by the number of days those miles are under said RFW. For example, if 100 OH circuit miles are under RFW for one day, and 10 of those miles are under RFW for an additional day, then the total RFW OH circuit mile days would be 110.
Reportable Ignition	OAR 860-024-0050(4). Except as provided in section (6) of this rule, every reporting operator must, in addition to the notice given in sections (2) and (3) of this rule for an incident described in sections (2) and (3), report in writing to the Commission within 20 days of knowledge of the occurrence using Form 221 (FM221) available on the Commission's website. In the case of injuries to employees, a copy of the incident report form that is submitted to Oregon OSHA, Department of Consumer and Business Services, for reporting incident injuries, will normally suffice for a written report.

[15] https://www.weather.gov/bro/mapcolors#:~:text=HW.W,within%20a%2012%20hour%20period.
[16] IEM :: NWS Watches Warnings Advisories Download (iastate.edu).

Term	Definition
Reporting Period	"Reporting period" is defined as the actual period of time the data is relevant. For example, the 2030 WMP filing should include the reporting period year of 2029.
Reporting Year Risk Designation	This attribute is used by the reporting utility to identify distinction levels of Wildfire Risk for the given reporting period year. (For example, Yellow and Red Risk Zones, Tier 1 or Tier 2, or HFRZ and Areas of Interest.) HFRZ areas and relevant sub-categories, if applicable, as defined by the utility.
Risk	A measure of the anticipated adverse effects from a hazard considering the consequences and frequency of the hazard occurring.[17]
Risk component	A part of an electric corporation's risk analysis framework used to determine overall utility risk.
Risk event	An event with probability of ignition, such as wire down, contact with objects, line slap, event with evidence of heat generation, or other event that causes sparking or has the potential to cause ignition. The following all qualify as risk events: · Ignitions · Outages not caused by vegetation · Outages caused by vegetation · Wire-down events · Faults · Other events with potential to cause ignition
Routine non-wildfire	Vegetation management removal or treatment programs conducted as cycle work, generally associated with clearance compliance with OAR 860-024-0016.
Routine wildfire	Vegetation management removal or treatment programs conducted programmatically that are intended to mitigate vegetation risks that could result in wildfire and are generally in excess of that required for compliance with OAR 860-024-0016.
Rura	Per IEEE 1782-2024 3.3 System characterization: Utility circuits (and systems) generally fall into one of the three categories below, which are defined by customer density. Rural (less than 31 customers per circuit kilometer or 50 customers per circuit mile).
Slash	Branches or limbs less than four inches in diameter, and bark and split products debris left on the ground as a result of utility vegetation management.
Span	The space between adjacent supporting poles or structures on a circuit consisting of electric lines and equipment. "Span level" refers to asset-scale granularity.
Suburban	Per IEEE 1782-2024 3.3 System characterization: Utility circuits (and systems) generally fall into one of the three categories below, which are

[17] Adapted from D. Coppola, 2020, "Risk and Vulnerability," *Introduction to International Disaster Management*, 4th ed.

Term	Definition
	defined by customer density. Suburban (31 to 93 customers per circuit kilometer or 50 to 150 customers per circuit mile).
Target	A forward-looking, quantifiable measurement of work to which an electrical corporation commits to in its WMP. Electrical corporations will show progress toward completing targets in subsequent reports.
Transmission Line	Transmission lines refer to all lines at or above 65kV.
Tree inspection Routine	Vegetation management inspection programs conducted as cycle work, generally associated with clearance compliance with OAR 860-024-0016.
Tree inspection Non-Routine	Vegetation management inspection programs conducted as non-cycle work, not generally associated with clearance compliance with OAR 860-024-0016.
Urban	Per IEEE 1782-2024 3.3 System characterization: Utility circuits (and systems) generally fall into one of the three categories below, which are defined by customer density. Urban (more than 93 customers per circuit kilometer or 150 customers per circuit mile).
Utility-related ignition	See Reportable Ignition.
Vegetation management (VM)	Trimming and removal of trees and other vegetation at risk of contact with electric equipment. OAR 860-024-0016 and OAR 860-024-0017.
Vulnerability	The propensity or predisposition of a community to be adversely affected by a hazard, including the characteristics of a person, group, or service and their situation that influences their capacity to anticipate, cope with, resist, and recover from the adverse effects of a hazard.
Wildfire hazard	The combination of ignition risk and fire spread resulting in a wildfire consequence.
Wildfire mitigation strategy	Overview of the key mitigation initiatives at enterprise level and component level across the electrical corporation's service territory, including interim strategies where long-term mitigation initiatives have long implementation timelines. This includes a description of the enterprise-level monitoring and evaluation strategy for assessing overall effectiveness of the WMP.
Wildfire risk	See Ignition Risk.
Wildland-urban interface (WUI)	The line, area, or zone where structures and other human development meet or intermingle with undeveloped wildland or vegetation fuels (National Wildfire Coordinating Group). Enforcement agencies also designate the WUI as the area at significant risk from wildfires, established pursuant to Title 24, Part 2, Chapter 7A. https://archive-osuwildfireriskmap.forestry.oregonstate.edu/wildland-urban-interface.
Wire down	Instance where an electric transmission or distribution conductor is broken and falls from its intended position to rest on the ground or a foreign object.

Term	Definition
Work order	A prescription for asset or vegetation management activities resulting from asset or vegetation management inspection findings.

Attachment C: Written Non-Utility Comments Received to Docket UM2340

Written Comments Received to Docket UM2340			Timing			
Party	**Description of Issue**	**Addressed**	**Phase 1**	**Phase 2**	**WMP Maturation (2026)**	**Comments**
Representative Marsh	Auditing of execution of plan work completed by utilities.	No				In conducting Division 024 Safety Program, Staff may observe WMP work and include in Safety Reports, however no programmatic audit function exists currently.
	PSP awareness of work being completed in concert with local hardening efforts (i.e., vegetation/fuel removal).	Yes	x	x	x	Staff recommendations include interim requirements regarding community outreach effectiveness; explore communications approaches and effectiveness concurrent with Phases 1, 2, and WMP Maturation.
	Reliability impacts generally.	Yes	x	x	x	Staff recommendations include requiring explanation of reliability impacts because of WMP efforts; explore communications approaches and effectiveness concurrent with Phases 1, 2, and WMP Maturation.
	Local resilience strategies being completed in alignment with WMPs.	Yes	x	x	x	Staff recommendations discuss need for resilience work in communities affected by fire risk, including battery program expansion and other adaptation strategies.
Senator Golden	Reliability impacts generally.	Yes	x	x	x	Staff recommendations include requiring explanation of reliability impacts because of WMP efforts; explore communications approaches and effectiveness concurrent with Phases 1, 2, and WMP Maturation.
	Technological improvements needed in grid design.	Yes	x	x	x	Staff recommendations for further discussion of pilot approaches and their long-term application for resilience for wildfire but also co-benefits delivered for other periods of extreme weather.
	Dialogue with communities regarding hardship mitigation during elevated fire risk periods.	Yes	x	x	x	Staff recommendations include requiring explanation of reliability impacts because of WMP efforts; explore communications approaches and effectiveness concurrent with Phases 1, 2, and WMP Maturation.
	Look for opportunities in the current plan approval process to facilitate conversation between utility and communities.	Yes	x	x	x	Explore communications approaches and effectiveness concurrent with Phases 1, 2, and WMP Maturation.
	Include place-based knowledge of community impacts into operational strategies and mitigation measures.	Yes	x	x	x	Explore communications approaches and effectiveness concurrent with Phases 1, 2, and WMP Maturation.
	Rates & SB762 impacts to consumers.	No				

Written Comments Received to Docket UM2340			Timing			
Party	**Description of Issue**	**Addressed**	**Phase 1**	**Phase 2**	**WMP Maturation (2026)**	**Comments**
CUB - NWEC - CEP - Verde - OJTA - GEI - Unite Oregon - Rogue Climate	Collaborative and cohesive engagement, including audit processes for work conducted and effectiveness of the work completed.	Part	/	/	/	In conducting Division 024 Safety Program, Staff may observe WMP work and include in Safety Reports, however no programmatic audit function exists currently; explore communications approaches and effectiveness concurrent with Phases 1, 2, and WMP Maturation.
	Accountability and effectiveness measures for outreach to stakeholder groups.	Yes	x	x	x	Staff recommendations include interim requirements regarding community outreach effectiveness; explore communications approaches and effectiveness concurrent with Phases 1, 2, and WMP Maturation.
	Consideration of CWPP in WMPs (demonstrable, if decided appropriate).	Yes		x		Staff recommendations regarding risk area identification and its reconciliation to other organizations' identified risk areas.
	Increased community engagement outreach efforts related to PSPS impacts, coordination gaps, identify potential solutions (i.e., CRCs, battery programs, communication effectiveness, adequacy of customer resources).	Yes	x	x	x	Staff recommendations include interim requirements regarding community outreach effectiveness; explore communications approaches and effectiveness concurrent with Phases 1, 2, and WMP Maturation.
	Jurisdictional WMP coordination with local, state, and federal entities on overlapping subject matters of the plans (i.e., vegetation management and mitigations strategies).	Yes	x	x	x	Regulations require public safety partner outreach and communication; explore communications approaches and effectiveness concurrent with Phases 1, 2, and WMP Maturation.
	Ongoing use of an independent evaluator to analyze multi-year filings as well as annual WMP updates.	Yes	x	x	x	Recognize the role of IE may be useful for update years as well as multiyear plan years but may be most useful when targeted toward specific tactics, i.e., vegetation management strategies.
Utility Customer Public Comments	Increased community engagement outreach efforts and coordination with mitigation efforts.	Yes	x	x	x	Staff recommendations include interim requirements regarding community outreach effectiveness; explore communications approaches and effectiveness concurrent with Phases 1, 2, and WMP Maturation.
	Expanded rules for outreach requirements.	No				
	Increased community resources for wildfire seasons.	No				

Written Comments Received to Docket UM2340			Timing			
Party	**Description of Issue**	**Addressed**	**Phase 1**	**Phase 2**	**WMP Maturation (2026)**	**Comments**
Utility Customer Public Comments	Concern about rate increases and actual work being achieved with increased rates.	Yes		x	x	Focus on risk reduction approaches using risk quantification and risk valuation.
	Designation of elevated risk areas and perspective that there is limited risk in certain areas, but they've been deemed elevated.	Yes		x	x	Identification and calibration of risks, aligned with external data sources.
	Increased outage rates and impacts to businesses, communities, and customers with limited or no communication and coordination to mitigate the consequences.	Yes	x	x	x	Staff recommendations include requiring explanation of reliability impacts because of WMP efforts; explore communications approaches and effectiveness concurrent with Phases 1, 2, and WMP Maturation.
	Advancement of wildfire mitigation work and analysis between utilities and other sectors to align efforts.	Yes	x	x	x	Regulations require public safety partner outreach and communication; explore communications approaches and effectiveness concurrent with Phases 1, 2, and WMP Maturation.
	Identification of risk reduction that mitigation measures provide, as well as demonstration of application of best choices for the communities as well as ensuring that communities are not without necessary resources during extreme heat.	Yes		x	x	Phase 2 includes risk quantification, estimation and valuation of mitigation approaches.
	Ensure a facet of wildfire mitigation includes grid modernization.	Yes	x	x	x	Currently contained in plans and explicitly identified in Initiative Listing.

ORDER NO.
24-326

ORDER NO. 24-260

ENTERED Aug 07 2024

BEFORE THE PUBLIC UTILITY COMMISSION

OF OREGON

UM 2340

In the Matter of PUBLIC UTILITY COMMISSION OF OREGON, Investigation Into Guidelines for Wildfire Mitigation Plans.	ORDER

DISPOSITION: STAFF'S RECOMMENDATION ADOPTED

At its public meeting on August 6, 2024, the Public Utility Commission of Oregon adopted Staff's recommendation in this matter. 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.

ITEM NO. CA7

PUBLIC UTILITY COMMISSION OF OREGON
REDACTED STAFF REPORT
PUBLIC MEETING DATE: August 6, 2024

REGULAR ____ **CONSENT** __X__ **EFFECTIVE DATE** _____**N/A**_____

DATE: July 29, 2024

TO: Public Utility Commission

FROM: April Brewer

THROUGH: Bryan Conway and Heide Caswell **SIGNED**

SUBJECT: OREGON PUBLIC UTILITY COMMISSION STAFF: Request to open an investigation into guidelines for wildfire mitigation plans.

STAFF RECOMMENDATION:

Staff recommends that the Public Utility Commission of Oregon (Commission) should open an investigation into wildfire planning requirements to facilitate a meaningful, transparent, and robust planning process.

DISCUSSION:

Issue

Whether the Commission should open an investigation into appropriate guidelines for Wildfire Mitigation Plans (WMP).

Applicable Law

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.

Analysis

Background
At the July 9, 2024, public meeting the Commission adopted Staff's recommendations for approval of the 2024 wildfire mitigation plans (WMP).[1] As part of Staff's recommendations in Docket Nos. UM 2207, 2208, and 2209, Staff made Joint Recommendations for next steps to advance WMPs. These recommendations included a multi-phase Commission-led process to develop WMP guidelines. Staff proposed establishing an investigation in a new docket to permit public participation and create a clear procedural venue in which to direct future WMP maturation. Staff now requests the initiation of the proposed investigation to facilitate the development of WMP guidelines.

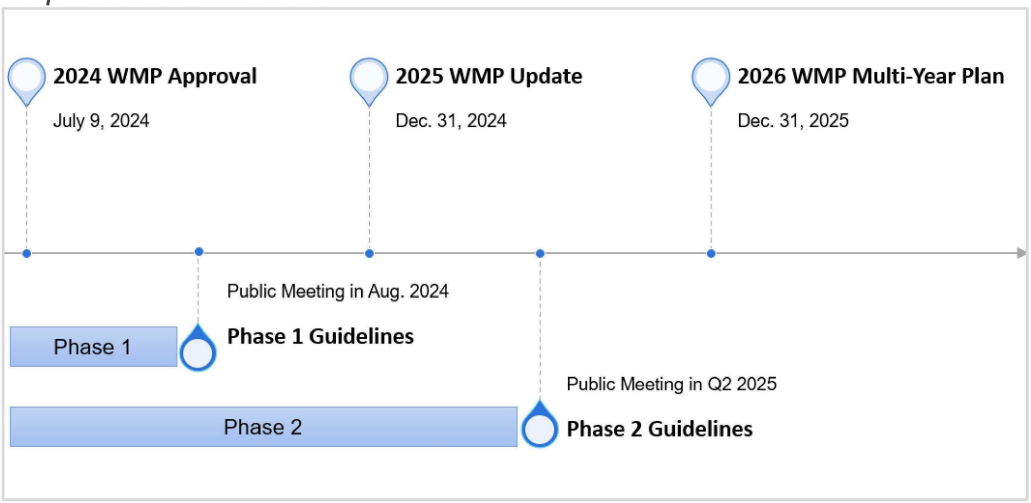
Proposed Investigation Structure and Timeline
Staff proposes an investigation structure that is phased, adaptive, and involves considerable engagement with Stakeholders, the utilities, and public safety partners. The proposed structure is summarized in table and figure, below, provided to the Commission at the July 9, 2024, public meeting.

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

[1] Order No. 24-230, *In the Matter of PacificPower 2024 Wildfire Mitigation Plan*, Docket No. UM 2207, July 10, 2024; Order No. 24-232, *In the Matter of Portland General Electric 2024 Wildfire Mitigation Plan*, Docket No. UM 2208, July 10, 2024; Order No. 24-231, *In the Matter of Idaho Power 2024 Wildfire Mitigation Plan*, Docket No. UM 2209, July 10, 2024.

Figure 1: Implementation Timeline



Staff has already published its Phase 1 proposal in the existing WMP reporting dockets, UM 2207, 2208, and 2209, with a request for public comments.[2] Phase 1 is on track for a Commission decision at the August 27, 2024, public meeting.

Following a Commission decision to open the investigation, Staff will develop, share, and begin executing a Phase 2 plan. As the investigation progresses, phases, goals, milestones, and objectives will be shaped by shared learnings and input from Stakeholders, the utilities, and public safety partners. Staff will continue to work to engage a broad Stakeholder group throughout the investigation.

Conclusion

Consistent with its Joint Recommendations, Staff finds that it is necessary to establish guidelines to ensure a meaningful, transparent, and robust wildfire planning process. Staff proposes to launch a phased investigation to facilitate establishment of guidelines which result in risk-based wildfire protection plans which protect public safety, reduce risk to utility customers and promote electrical system resilience to wildfire damage while appropriately balancing mitigation costs with the resulting reduction of wildfire risk.

PROPOSED COMMISSION MOTION:

Open an investigation into guidelines for Wildfire Mitigation Plans.

Investigation into WMP Guidelines.

[2] *See* Docket Nos. UM 2207, UM 2208, and UM 2209, Staff's WMP Phase 1 Proposal, July 26, 2024.