ORDER NO. 25-235

ENTERED Jun 26 2025

BEFORE THE PUBLIC UTILITY COMMISSION

OF OREGON

UM 2209

In the Matter of IDAHO POWER COMPANY, Wildfire Protection Plan.	ORDER

DISPOSITION: STAFF'S RECOMMENDATION ADOPTED

At its Special Public Meeting on June 26, 2025, 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. RA3

PUBLIC UTILITY COMMISSION OF OREGON
STAFF REPORT
SPECIAL PUBLIC MEETING DATE: June 26, 2025

REGULAR	X	CONSENT		EFFECTIVE DATE	Upon Commission Approval

DATE: June 20, 2025

TO: Public Utility Commission

FROM: Heide Caswell

THROUGH: Bryan Conway **SIGNED**

SUBJECT: IDAHO POWER COMPANY:
(Docket No. UM 2209)
Idaho Power Company 2025 Wildfire Mitigation Plan Update

STAFF RECOMMENDATION:

Approve Idaho Power's 2025 Wildfire Mitigation Plan (WMP, Plan, or Update) and adopt Staff's recommendations for additional improvement.

DISCUSSION:

Issue

Whether the Oregon Public Utility Commission (Commission) should approve Idaho Power's (IPC or Company) 2025 Wildfire Mitigation Plan Update. Whether the Commission should direct Idaho Power to take the actions recommended by Staff.

Applicable Rule or Law

ORS 757.960 directs the Commission to evaluate electric companies' risk-based wildfire protection plans and planned activities to protect public safety, reduce risks to utility customers, and promote energy system resilience in the face of increased wildfire frequency and severity, and in consideration of the recommendations made by the Governor's Council on Wildfire Response 2019 Report and Recommendations.

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

Division 300 of the Oregon Administrative Rules (OARs) articulates the minimum requirements for the Plan fillings as well as the process for Commission approval of the plans. Further, In Order 24-326, the Commission adopted guidelines for wildfire mitigation plans

The Commission approved the Idaho Power 2024 WMP in Order No. 24-231 and directed that the utility consult with Staff regarding the implementation of the recommendations in its future plans.

Analysis

Background
On December 31, 2024, Idaho Power filed its WMP Update with the Commission. In addition to the WMP update the Company filed its first 2025 Initial WMP Data Template Workbook, which included data through the third quarter of 2024 and forecasted work through 2028. On March 31, 2025, Idaho Power filed its Final 2024 WMP Data Template Workbook, which included revisions to the Initial 2025 WMP Data Template Workbook and 2024 fourth quarter results.

Staff recognizes and appreciate the amount of work and effort that goes into producing a WMP. IPCs 2025 WMP Update provided an additional level of insight into the Company's wildfire planning practices. Readers gained insight into program specific processes and investments the utility is making to identify risk. Oregon's Investor-Owned Electric Utilities (IOUs or the Utilities) have been lauded for their efforts in WMP development and Plan maturity.[1] Staff appreciates the Utilities' collaborative approach to an evolving process and willingness to have open conversations about their Plans as well as a shared commitment to addressing the significant risk wildfires pose to utility infrastructure and public safety.

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

This memo provides recommendations throughout and concludes with Staff's recommendations to approve IPC's 2025 WMP Update. Staff provides recommendations and identifies additional information, shown in Attachments B and C, for integration in IPC's WMPs throughout this next planning cycle (2026-2028). As an important step in improving WMPs, Staff also identifies opportunities for advancement with an eye towards effectuating meaningful, robust, and transparent wildfire plans and processes.

IPC's 2025 WMP represents the fourth year of wildfire planning pursuant to Oregon's statutory requirement, though IPC has been developing wildfire mitigation plans since 2019.[2] Staff recognizes that requirements will continue to evolve over time as wildfire strategies continue to advance. Mitigation strategies, risk analysis, cost-benefit analysis, and programs will continue to expand and mature. Staff views WMPs are viewed not as static but rather as dynamic where the environment in which improved practices will advance electric safety and reliability for the utilities and the public they serve.

Staff Review of the Idaho Power 2025 WMP
Staff's analysis, detailed below, considers the Company's compliance with the WMP minimum requirements set forth in Division 300. The comments and recommendations in this memo, reflect Staff's review of the Company's WMP Update, the IE's Report, and stakeholder comments, as well as ongoing participation in WMP workshops, and stakeholder engagement. In addition to written stakeholder comments, Staff and the independent evaluator consulted with various subject matter experts to understand current industry standards and practices.

Climate Wildfire and Energy Strategies, LLC (CWE) was selected to serve as the independent evaluator (IE) for the 2025 WMP Updates. CWE assisted in Staff's review of the Plan for compliance, provided written reports to assist in Staff's overall evaluation of the Plan. Staff highly values the perspective provided by the IE and their insights on utility wildfire planning that is informed by utilities at various stages of maturity.

For evaluation of the 2025 WMP Updates the IE continued to use the same compliance metrics established by Bureau Veritas North America, adopting the ranking system of "Met," "Substantially Met," "Partially Met," and "Not Met." Staff has not adopted this ranking system for compliance and instead concludes that the utility either met the requirement or did not meet the requirement. However, Staff adopts this more nuanced ranking system for completion of recommendations.

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

Staff appreciates the valuable work and perspective that the IE brings to the WMP review process. Staff ultimately choose to incorporate some, but not all, of the recommendations from the CWE's report into Staff's recommendations for IPC.

Staff groups its recommendations for the 2025 WMP Updates into two categories, summarized in Attachment B: 1) recommendations specific to Idaho Power; 2) joint utility recommendations for near-term improvement of plans for the next WMP cycle.[3] Staff notes that the 2025 WMP Updates provided new information and learnings relevant for the WMP maturation work, underway in docket UM 2340, as well as identification of valuable evolutionary activities long term. Staff has included its takeaways for UM 2340 in Attachment C but does not include them as recommendations in this docket.

Stakeholder Comments on the WMP Update
As part of the 2025 Update process, stakeholders were encouraged to share comments on IPC's Update and the Draft IE Report. Staff appreciates the time, effort, and insight provided in stakeholder comments. Staff notes while that some stakeholders chose to submit comments specific to IPC's WMP Update, others provided overarching comments for all three utility WMPs. A summary of comments received in the UM 2209 docket can be found in Attachment A.

Most stakeholders included comments on the WMP process and noted further work that would improve future Plans. Comments were generally supportive of IE recommendations, although each of the utility comments raised issues around the appropriate forum and process for addressing IE recommendations.

Process
The 2025 WMP process kicked off with a two-part workshop on February 6, 2025, which allowed for IOUs to present their Plans and for a community feedback session.

Staff's review of the 2025 WMP Update differs significantly from the review of prior WMPs. In addition to compliance with the WMP requirements set forth in Division 300 Staff's analysis now considers the Company's adherence to the Guidelines adopted in UM 2340.

These guidelines include a shift to multi-year wildfire planning cycle and include new information, such as the data templates and explanation of progress made in areas for additional improvements—those recommendations adopted by the Commission when approving the 2024 WMP.

[3] Staff's recommendations adopt a new numbering approach with each recommendation reflecting the year (25) and indicating who the recommendation was for (ALL or IP).

IPC provided an initial filing on December 31, 2024, for the Update and its Data Template Workbooks. The template was augmented with fourth quarter information. These documents provide greater insight into how the company's plan had evolved from its previous multiyear filing and served to highlight the value of continued co-development with utilities as it pertains to formats and details in Updates and Multi-Year Plans.

Staff Recommendations for Idaho Power:

- ALL_2501: A template for future WMP Updates should be created and that a standard "red line" with reconciliation against the Multi-Year WMPs should be developed. Accordingly in years where a WMP Update is required the following should be submitted: (1) a "red-line version" of the Multi-Year WMP indicating any and all changes made, (2) a "clean version" of the Multi-Year WMP with any and all changes made, and (3) a templated WMP Update showing original targets contained in the Multi-Year Plan, actual or projected costs and units for any completed year, changes in targets, changes in projected expenditures, new initiatives, projected expenses for new initiatives for the update year, and justification for all changes made.

Incorporation of 2024 Recommended Areas for Additional Improvement
In its Commission Order, 24-232, IPC was directed to incorporate Staff Recommendations, which the Company reported on as areas for improvement in the 2025 WMP Update. The IE assessment provided substantial insight into progress made on these items. The IE and Staff assessment are detailed in Table 1, below. This demonstrates the growth that each of the utilities is making in response to feedback received, which establishes the continuous learning cycle for both the utilities and plan evaluators.

Table 1: Areas for Additional Improvement

Idaho Power Progress Against Staff Recommendations (Order 24-231)			
OPUC ID Number	Description	IE Conclusion: Met/Partially Met/Did Not Meet/Not Due	OPUC Staff Conclusion: Met/Partially Met/Did Not Meet/Not Due
1	240 Meter Buffer	Met	Met
2	Differentiation of YRZs and RRZs	Met	Met
3	Model Inputs, Weightings, and Methodology for Locational Risk	Not Due Until 2026	Not Due Until 2026
4	Risk Mitigation Impacts on Utility Risk	Met, but Not Due Until 2026	Met, but Not Due Until 2026
5	Evolution of Tables 7 and 9	Not Due Until 2026	Not Due Until 2026
6	Command Structure During Emergency Response	Met	Met
7	Type and Frequency of PSP Interactions	Met	Met
8	WMP Evolution Based on PSP Feedback	Met, but Not Due Until 2026	Met, but Not Due Until 2026
9	CBO Support for PSPS	Met	Met
10	Use of emPOWER in Oregon	Met	Met
11	Battery Rebates for PSPS	Met	Partially Met
12	PSPS Information to Cover Other Safety Topics	Met, but Not Due Until 2026	Met, but Not Due Until 2026
13	Community Outreach Effectiveness	Not Due Until 2026	Not Due Until 2026
14	Timing of Inspections and Corrections	Met	Met
15	Historic Ignitions and Risk Driver Analysis	Partially Met	Met
16	Evolution of Vegetation Management Program	Met	Met
17	Advancing Technology Maturity	Not Due Until 2026	Not Due Until 2026
18	IWRMC Results	Met	Met
19	Optimization of Vegetation Management Program	Partially Met	Partially Met
20	Align Inspection and Root Cause Analysis with Peers	Not Due Until 2026	Not Due Until 2026

In addition, in Order 24-326[4], the Commission directed the utilities and Staff to advance WMP processes by developing consistent methods for data reporting. Introduction of standard data tables raised concerns about cost impacts associated with the data template developed by Staff. Staff valued the feedback provided by the utilities that improved the clarity and consistency of the template and intends to continue the collaboration with them. Further, Staff appreciates the detailed information provided in Update Plans, in which each of the utilities identified additional costs that would result. The recurring data template preparation cost estimates range from 0.0027 percent to 0.67 percent of annual WMP spend. Staff believes the value received in analysis warrants such relatively low additional costs. In addition, Staff believes that the utilities will benefit in better informed decisions, thus co-benefits of this investment are anticipated. And more broadly, if consistency is established for wider use (i.e. western US), further value can reasonably be expected.

[4] Docket UM 2340 was initiated to investigate guidelines for wildfire mitigation plan evolution.

Staff recognizes the initial work required for creating a cohesive WMP process but is hopeful that once data systems are developed and in place it will reduce the utility burden in updating data annually while allowing staff to efficiently and effectively review processes and costs associated with wildfire mitigation. Staff believes it is important that as the utilities evolve in their wildfire mitigation programs customers, regulators, peers and other recognize where each of the utilities is on their journey and the progress they have made. Further, continuing refinement of terms and Plan or Update details is another critical improvement.

Staff Recommendations for Idaho Power:

- ALL_2502: Undertake the International Wildfire Risk Mitigation Consortium (IWRMC) Maturity Model assessment on an annual basis in December and submit results concurrent with annual WMP filings. For transparency, Maturity Model results should be publicly available.
- ALL_2503: Work with Staff to improve the value of the data reporting template, including creating needed definitions and ensuring sufficient details are captured to limit non-descriptive information (i.e. the use of "Other") and show alignment with administrative rules or industry guidelines or standards.

Plan Compliance Review and Recommendations for future Plans by Section
OAR 860-300-0020 (1)(a)(A) & (B):
Identified areas that are subject to a heightened risk of wildfire, including determinations for such conclusions, and are:
(A) Within the service territory of the Public Utility, and
(B) Outside the service territory of the Public Utility but within the Public Utility's right-of-way for generation and transmission assets.

Staff Analysis:
As determined in past Plan reviews, Idaho Power met the requirements for identifying high fire risk zones (HFRZ) within its service territory and associated with its generation and transmission assets. Staff appreciates that there is continued maturing that has occurred with the Idaho Power Wildfire mitigation plans. Staff also appreciates the greater level of information which Idaho Power provided to explain its yellow and red risk zones (YRZ and RRZ). Consistent with the recommendations made by the IE, the next logical evolution is analyzing utility assets at a level lower than circuits, i.e. circuit zones of protection or circuit segments, which forms the basis for one specific recommendation for Idaho Power.

Staff Recommendations for Idaho Power:

- IP_2501: OPUC Staff concurs with the IE that IPC should clarify its estimated timeline for circuit segment/zone of protection assessment of utility risk and wildfire risk modeling.

OAR 860-300-0020 (1)(b):
Identified means of mitigating wildfire risk that reflects a reasonable balancing of mitigation costs with the resulting reduction of wildfire risk.

Staff Analysis:
As determined in past Plan reviews, Idaho Power met the requirements to outline how it uses relevant data to inform its prioritization process for mitigation measures.

Staff Recommendations for Idaho Power:

- ALL_2504: Provide an explanation for current and future approaches for establishing associations between legacy outage data and ignition risk drivers. This should include providing any lookup tables or graphic and tabular depictions that clarify how the relationships are established until more direct relationships between outage management system data and the Risk and Ignition Event Categorization in the WMP Data Template. To the extent that the utility uses comments or other sources to identify "wire down events" or other values that better report on wildfire risk events, it should clarify the process used.
- ALL_2505: Greater analysis and exploration of outage causes and their correlation to ignition risk drivers should be quantified, ideally at a fault rate per unit length in the conductors/zones of protection. Each company should participate in a process designed to explore correlations between ignition risk drivers and how they vary.
- ALL_2506: Work with Staff to determine how best to produce information demonstrating the areas of utility risk that can be used by regulators, customers and PSPs. This should include tabularly, circuit or circuit segments[5] including, at minimum, the following information: (1) Circuit ID by a circuit segment, (2) percent within Utility Wildfire Risk Area, (3) circuit or circuit segment risk scores (4) ignition risk drivers resulting in score (with explanation of how the score was calculated), (4) the operating area, (5) the town or general location (6) HFRZ named area, (7) total overhead circuit length, (8) total underground circuit length and (9) the status of any project (such as under evaluation, ongoing, completed, or none).

[5] Circuit segmentation can be done at zone of protection (ZOP) level or something more granular if chosen by the utility.

- ALL_2507: Provide in the 2026 WMP, a table of all current and planned mitigation work investments. Include the following details: (1) Circuit ID or circuit segment, (2) Risk Score prior to and (3) after improvement, (4) RSE Score,[6] (5) the historic ignition driving risk driver (historical outage records, weather or landscape changes), (6) Capital investment Cost, (7) Expense (O&M) Cost, (8) target date for engineering, (9) target date for construction, (10) target date for completion, (11) Improvement Units (miles of conductor changes, or equipment installed), and (12) comments on any year over year changes to the above.

OAR 860-300-0020 (1)(i):
Identification of the development, implementation, and administrative costs for the plan, which includes discussion of risk-based cost and benefit analysis, including consideration of technologies that offer co-benefits to the utility's system.

Staff Analysis:
Idaho Power met the requirement of this rule by providing a description of costs as well as tables that show the forecasted budget over a five-year period; this was augmented by a matrix of investments it plans to make over a five-year horizon.

Staff Recommendations for Idaho Power:

- ALL_2508: Include grant details in the WMPs for any new, or updated, approved grants for current and future receipts. Details shall include the project it benefitted, the awarding agency(s), amount awarded, timeline, and funding status. The Company should demonstrate how each grant impacts project costs and customer rates, as well as how the Company will manage reimbursement, and any adjustments due to funding delays.

OAR 860-300-0020 (1)(c):
Identified preventative actions and programs that the utility will carry out to minimize the risk of the utility's facilities causing wildfire.

[6] Provide if the utility has developed a risk score.

Staff Analysis:
Idaho Power has met this requirement, outlining the various mitigation measures that the Company considers that are intended to minimize the risk of its facilities initiating an ignition.

Staff Recommendations for Idaho Power:

- ALL_2509: Provide additional information when there are changes to work currently queued up for implementation. If a project is delayed, explain whether the delay will be resolved within the year or if delays are expected to continue into future years. For delays expected to continue into future years, note how the delay may affect risk reduction for the system.
- ALL_2510: In the Multi-year and Update WMP Plans, track the historical and forecasted annual equipment upgrades (such as number of CFCI's installed, miles of spacer cable, miles of covered conductor (not spacer cable), miles of underground conductor, cameras installed, pole replacements, poles wrapped, etc.) including a comparison of projected and actual unit completion amounts by year.

OAR 860-300-0020 (1)(d):
Discussion of the outreach efforts to regional, state, and local entities, including municipalities, regarding a protocol for the de-energization of power lines and adjusting power system operations to mitigate wildfires, promote the safety of the public and first responders, and preserve health and communication infrastructure.

Staff Analysis:
Idaho Power met the requirement to outreach communities regarding PSPS, including providing information regarding situational awareness. Staff observes that Idaho Power, like the other IOUs continues to build its understanding of how to tailor communications with its partners and communities, recognizing the relatively sparse customers within the area it serves.

Staff Recommendations for Idaho Power:

- ALL_2511: Include a list of any WMP-relevant surveys conducted during the year. Details should include the languages that the survey was offered in, the total responses, and an outline of each question asked and what the available responses were. Outline any lessons learned or program shifts as a result of the survey responses.

OAR 860-300-0020 (1)(e):
Identified protocol for the de-energization of power lines and adjusting of power system operation to mitigate wildfires, promote the safety of the public and first responders, and preserve health and communication infrastructure.

Staff Analysis:
Idaho Power's communications protocols met the requirements for Public Safety Power Shutoffs (PSPS) communications consistent with regulations. Staff concurs with the IE that Idaho Power should continue to evaluate battery programs (or other methods to support medically vulnerable customers and communicate about the findings of any studies; Idaho Power should also continue to monitor the programs Pacific Power and PGE have implemented and determine whether these could serve as bases for enhancing their approach.

Staff Recommendations for Idaho Power:

- IP_2502: Idaho Power should explain the analysis is has conducted regarding battery (or other method of support) rebate program for medically vulnerable customers in Oregon. If Idaho Power does not intend to pursue such a program, it should explain why, or at minimum, explain how these customers are supported during PSPS or other resilience events.
- ALL_2512: In the 2026 WMP, describe the utility's capability for real-time communication during a PSPS event to customers and public safety partners, in the appropriate languages, the following information: what the current PSPS forecast is, where the PSPS is to take place, how long it is expected to last, when restoration is expected to begin, and for public safety partners, how they can receive GIS files for the areas.

OAR 860-300-0020 (1)(f):
Identification of the community outreach and public awareness efforts that the utility will use before, during, and after a wildfire season.

Staff Analysis:
Idaho Power met requirements to outline methods for community outreach. Staff agrees that continued focus on developing effective methods of communicating with urban and rural communities is valuable for Idaho Power and the IOUs generally.

OAR 860-300-0020 (1)(g):
Description of procedures, standards, and time frames that the Public Utility will use to inspect utility infrastructure in areas the Public Utility identified as heightened risk of wildfire.

Staff Analysis:
Idaho Power met the requirements for inspection and correction, including outlining its inspection types and the frequency and their correction timeframes.

Staff Recommendations for Idaho Power:

- ALL_2513: Work with Staff to develop content regarding inspection program details, clearly associated with relevant governing codes, in addition to utility-specific inspection programs (such as infrared inspections, etc). Further details provided should include an annual summary of general findings and correction plan results of those findings.

OAR 860-300-0020 (1)(h):
Description of the procedures, standards, and timeframes that the utility will use to carryout vegetation management in areas it has identified as heightened risk of wildfire.

Staff Analysis:
Idaho Power met the requirement for outlining its approach to vegetation management, including areas within and outside its designated high fire risk areas. As recommended by the IE, there appear to be opportunities for industry sharing among the IOUs, particularly an area for Idaho Power to share is the concept behind its VRI, including the data it evaluated and what findings in these analyses helped identify where additional inspection would be beneficial during high fire risk periods.

Staff Recommendations for Idaho Power:

- IP_2503: Idaho Power should share its VRI with the other IOUs during any "best practice sharing meetings" and other collaborative venues.

OAR 860-300-0020 (1)(j):
Description of participation in national and international forums, including workshops identified in section 2, chapter 592, Oregon Law 2021, as well as research and analysis the utility has undertaken to maintain expertise in leading edge technologies and operational practices, as well as how such technologies and operational practices have been used to develop and implement cost effective wildfire mitigation solutions.

Staff Analysis:
Idaho Power met the requirement of this rule by explaining its engagement in industry collaboration. Staff agrees with the IE's recommendations for OAR 860-300-0020 (1)(j) that more explanation regarding technologies and the role they play now and, in the future, would be beneficial.

Staff Recommendations for Idaho Power:

- ALL_2514: Work with Staff to develop content regarding industry engagement activities including pilot program development and deployment. The content should describe current, proposed or piloted program changes, outlining any cross-utility collaborations and/or industry learnings which directed the change.

OAR 860-300-0020 (1)(k):
Description of ignition inspection programs, as described in Division 24 of these rules, including how the utility will determine, and instruct its inspectors to determine conditions that could pose an ignition risk on its own equipment and pole attachments.

Staff Analysis:
Idaho Power met the requirements related to ignition prevention inspections processes.

Conclusion

Staff recommends approval of Idaho Power's 2025 WMP Update. Staff provides its recommendations for incorporation into Idaho Power's 2026-2028 WMP and identifies them in Attachments B.

While Staff recommends the Commission accept Idaho Power's 2025 WMP Update, Staff's review makes no judgement on reasonableness or effectiveness of any mitigation measure. Commission acceptance of the Plan does not constitute a determination on the prudence of any individual actions discussed in the Plan. Staff understands that those individual actions, including project specific data, will be reviewed through the cost recovery process.

PROPOSED COMMISSION MOTION:

Approve Idaho Power's 2025 Wildfire Mitigation Plan Update and adopt Staff's recommendations for additional improvement.

Stakeholder Comments in UM 2209
Attachment A

Commenter	Summary	Pacific Power	Portland General Electric	Idaho Power	Staff
NWEC, CEP, & CUB	Support all IE recommendations and IE input highly valuable.	X	X	X	
	Prioritize actions associated with community engagement, transparency and costs.	X	X	X	
	Requested more time for comments…recommend 30 days. Ensure the extended time relates to standard templates and other required content for all parties.				X
	Continue to streamline and enhance utility plans.	X	X	X	
	Consider how other planning activities are addressed within WMP activities.	X	X	X	
	Balance investments in advanced modeling and other utility benefits versus those that improve community energy resilience.	X	X	X	
	IOUs should demonstrate how they are sharing resources with PSPs and others that result in reduced costs for customers; this could include providing data and assessment information to support others' situational awareness and readiness.	X	X	X	
	More targeted data for communities about what drives the composite fire risk scores.	X			
	Risk spend efficiency calculations do not demonstrate the risk avoidance or cost control. This must be addressed before any cost recovery is afforded PacifiCorp.	X			
	With level of spending in plans better support for most vulnerable customers is needed.	X	X	X	

Commenter	Summary	Pacific Power	Portland General Electric	Idaho Power	Staff
	Insufficient communication within the Update about operational settings and the subsequent restoration for PSPS and "sensitive settings."	X			
	The lack of distinction between HFRZ and non-HFRZ and mitigation prioritization not aligning with high fire risk areas is concerning. Lack of incorporation of maximum wind gusts in geo-probability model is concerning.		X		
	IOUs should collaboratively share their experiences, openly comparing outcomes and tradeoffs.	X	X	X	
	IOUs should better communicate with local CBOs, schools and community groups to spread information and education, including activities they are taking with their WMPs.	X	X	X	
	Support for vegetation management working group and generally all input from IE on vegetation plans.	X	X	X	
	Better granularity between Idaho and Oregon actions.			X	
	Technologies and co-benefits continue to be unsupported in risk reduction cost effectiveness.	X	X	X	
American Composites Manufacturers Association	Recommend strategic deployment of composite (FRP) poles for life extension and fire resilience.	X	X	X	

Commenter	Summary	Pacific Power	Portland General Electric	Idaho Power	Staff
Rich Fairbanks	Additional time for comments. De-energizing power lines during windy conditions may create additional community risks, such as people placing emergency generators which have their issues. The impacts of climate change are felt by him, others and Pacific Power. Consider other vegetation adaptations which can create benefits for environment and utility risk. Invites contact to discuss further ideas.	X			X
Wendy King	Believes IPC needs to demonstrate how it will accomplish more undergrounding (assumed to be distribution versus transmission); advocates for stronger structures that may be more than historic wind forces would require, particularly since limited extreme wind data seems to be part of the current thought. Recommends work by IPC with PSPs regarding electrical operations in the face of variable and novel resources and operating regimes. Suggests more transparency in evaluating how fire risk areas are established.			X	
PacifiCorp	Believes they largely met the requirements, either in the Update or in the Supplemental. Doesn't think this docket is the appropriate place for requirements to be set; rather in UM2340. Is bothered by the number of IE recommendations for immediate inclusion in plans. Concurs on the shortfall of certain areas but says it will be addressed in their 2026-2028 filing.	X			
PGE	Believes, rulemaking is a more appropriate venue for many of the specific recommendations made by staff. Challenges whether the additional costs that will be borne to fulfill Staff recommendations are valuable to customers. Believes several of the tasks in recommendations are best led by Staff.		X		

Commenter	Summary	Pacific Power	Portland General Electric	Idaho Power	Staff
IPC	Appreciates acknowledgement of the improvements it's made in its Plan. IPCs unsure of what Staff position is on approval or approval with conditions and which advancement steps would be required. Interested in engaging with parties to discuss how to address advancement from timing and value perspective.			X	

Summary of Staff Recommendations UM 2209
Attachment B

Recommendations Specific to Idaho Power

- IP_2501: OPUC Staff concurs with the IE that IPC should clarify its estimated timeline for circuit segment/zone of protection assessment of utility risk and wildfire risk modeling.
- IP_2502: Idaho Power should explain the analysis is has conducted regarding battery (or other method of support) rebate program for medically vulnerable customers in Oregon. If Idaho Power does not intend to pursue such a program, it should explain why, or at minimum, explain how these customers are supported during PSPS or other resilience events.
- IP_2503: Idaho Power should share its VRI with the other IOUs during any "best practice sharing meetings" and other collaborative venues.

Joint Recommendations

- ALL_2501: A template for future WMP Updates should be created and that a standard “red line” with reconciliation against the Multi-Year WMPs should be developed. Accordingly in years where a WMP Update is required the following should be submitted: (1) a "red-line version" of the Multi-Year WMP indicating any and all changes made, (2) a “clean version” of the Multi-Year WMP with any and all changes made, and (3) a templated WMP Update showing original targets contained in the Multi-Year Plan, actual or projected costs and units for any completed year, changes in targets, changes in projected expenditures, new initiatives, projected expenses for new initiatives for the update year, and justification for all changes made.*
- ALL_2502: Undertake the International Wildfire Risk Mitigation Consortium (IWRMC) Maturity Model assessment on an annual basis in December and submit results concurrent with annual WMP filings. For transparency, Maturity Model results should be publicly available.
- ALL_2503: Work with Staff to improve the value of the data reporting template, including creating needed definitions and ensuring sufficient details are captured to limit non-descriptive information (i.e. the use of “Other”) and show alignment with administrative rules or industry guidelines or standards.
- ALL_2504: Provide an explanation for current and future approaches for establishing associations between legacy outage data and ignition risk drivers. This should include providing any lookup tables or graphic and tabular depictions that clarify how the relationships are established until more direct relationships between outage management system data and the Risk and Ignition Event Categorization in the WMP Data Template. To the extent that the utility uses comments or other sources to identify “wire down events” or other values that better report on wildfire risk events, it should clarify the process used.
- ALL_2505: Greater analysis and exploration of outage causes and their correlation to ignition risk drivers should be quantified, ideally at a fault rate per

unit length in the conductors/zones of protection. Each company should participate in a process designed to explore correlations between ignition risk drivers and how they vary.*

- ALL_2506: Work with Staff to determine how best to produce information demonstrating the areas of utility risk that can be used by regulators, customers and PSPs. This should include tabularly, circuit or circuit segments[1] including, at minimum, the following information: (1) Circuit ID by a circuit segment, (2) percent within Utility Wildfire Risk Area, (3) circuit or circuit segment risk scores (4) ignition risk drivers resulting in score (with explanation of how the score was calculated), (4) the operating area, (5) the town or general location (6) HFRZ named area, (7) total overhead circuit length, (8) total underground circuit length and (9) the status of any project (such as under evaluation, ongoing, completed, or none).*
- ALL_2507: Provide in the 2026 WMP, a table of all current and planned mitigation work investments. Include the following details: (1) Circuit ID or circuit segment, (2) Risk Score prior to and (3) after improvement, (4) RSE Score[2], (5) the historic ignition driving risk driver (historical outage records, weather or landscape changes), (6) Capital investment Cost, (7) Expense (O&M) Cost, (8) target date for engineering, (9) target date for construction, (10) target date for completion, (11) Improvement Units (miles of conductor changes, or equipment installed), and (12) comments on any year over year changes to the above.
- ALL_2508: Include grant details in the WMPs for any new, or updated, approved grants for current and future receipts. Details shall include the project it benefitted, the awarding agency(s), amount awarded, timeline, and funding status. The Company should demonstrate how each grant impacts project costs and customer rates, as well as how the Company will manage reimbursement, and any adjustments due to funding delays.
- ALL_2509: Provide additional information when there are changes to work currently queued up for implementation. If a project is delayed, explain whether the delay will be resolved within the year or if delays are expected to continue into future years. For delays expected to continue into future years, note how the delay may affect risk reduction for the system.
- ALL_2510: In the Multi-year and Update WMP Plans, track the historical and forecasted annual equipment upgrades (such as number of CFCI's installed, miles of spacer cable, miles of covered conductor (not spacer cable), miles of underground conductor, cameras installed, pole replacements, poles wrapped, etc.) including a comparison of projected and actual unit completion amounts by year.
- ALL_2511: Include a list of any WMP-relevant surveys conducted during the year. Details should include the languages that the survey was offered in, the

[1] Circuit segmentation can be done at zone of protection (ZOP) level or something more granular if chosen by the utility.
[2] Provide if the utility has developed a risk score.

total responses, and an outline of each question asked and what the available responses were. Outline any lessons learned or program shifts as a result of the survey responses.

- ALL_2512: In the 2026 WMP, describe the utility's capability for real-time communication during a PSPS event to customers and public safety partners, in the appropriate languages, the following information: what the current PSPS forecast is, where the PSPS is to take place, how long it is expected to last, when restoration is expected to begin, and for public safety partners, how they can receive GIS files for the areas.
- ALL_2513: Work with Staff to develop content regarding inspection program details, clearly associated with relevant governing codes, in addition to utility-specific inspection programs (such as infrared inspections, etc). Further details provided should include an annual summary of general findings and correction plan results of those findings.*
- ALL_2514: Work with Staff to develop content regarding industry engagement activities including pilot program development and deployment. The content should describe current, proposed or piloted program changes, outlining any cross-utility collaborations and/or industry learnings which directed the change. *

Timeframe for addressing Staff Recommendations:

	Recommendations:
Address in 2026 WMP	IP_2501; IP_2502; IP_2503; ALL_2502; ALL_2503; ALL_2504; ALL_2507; ALL_2508; ALL_2509; ALL_2510; ALL_2511; ALL_2512
Address in 2027 or later WMP (denoted with *)	ALL_2501; ALL_2505; ALL_2506; ALL_2513; ALL_2514

Learnings and Takeaways for Advancing Wildfire Mitigation Plans
Attachment C

Summary

Previously, the Commission recognized that wildfire mitigation planning in the utility environment is a journey, evolving over time. Since the commission order 24-326, steady progress has been made advancing WMPs developed by the utilities. With that momentum established, Staff envisions its takeaways from the 2025 WMP Updates being organized in a manner to continue such co-creation.

Process for Implementation

Consistent with the work developed through UM 2340, Staff's vision for the wildfire mitigation planning process is not to implement a top-down approach with prescriptive outcomes, but rather to provide the framework and language which enables clear communication and understanding of the WMPs. Continued evolution will require coordination and collaboration with the utilities. As noted previously, the costs of such an effort are significantly outweighed by the benefits to the public. The risk of wildfires is too significant for the Commission to lack visibility into quantity of risk reduction or cost effectiveness of the WMPs.

Staff carefully considered recommendations made in IE reports and determined that some of the IE recommendations were more appropriate for consideration in the UM 2340 investigation. These joint utility Staff recommendations are listed below and are grouped into recommendations to address in 2026 and recommendations to address in 2027 and aligned to the relevant Oregon Administrative Rule (OAR) where applicable.

Table 1: Staff joint recommendations associated with UM 2340 and future working groups

Where it will be addressed	Recommendation	Administrative Rule Section
UM 2340	UM2340_2501	OAR 860-300-0020 (1)(a)(A)+(B)
UM 2340	UM2340_2502	OAR 860-300-0020 (1)(b)
UM 2340	UM2340_2503	OAR 860-300-0020 (1)(b)
UM 2340	UM2340_2504	OAR 860-300-0020 (1)(b)
UM 2340	UM2340_2505	OAR 860-300-0020 (1)(d)
UM 2340 - Future Topic	UM2340_2506	OAR 860-300-0020 (1)(e)
UM 2340 - Future Topic	UM2340_2507	OAR 860-300-0020 (1)(g)
UM 2340 - Future Topic	UM2340_2508	OAR 860-300-0020 (1)(h)
UM 2340 - Future Topic	UM2340_2509	OAR 860-300-0020 (1)(h)
UM 2340 - Future Topic	UM2340_2510	OAR 860-300-0020 (1)(j)
UM 2340 - Future Topic	UM2340_2511	OAR 860-300-0020 (1)(k)

OAR 860-300-0020 (1)(a)(A)+(B)
Identified areas that are subject to a heightened risk of wildfire, including determinations for such conclusions, and are:
(A) Within the service territory of the Public Utility, and
(B) Outside the service territory of the Public Utility but within the Public Utility's right-of-way for generation and transmission assets.

- UM2340_2501: The Multi-Year Wildfire Mitigation Plan (WMP) should include a section that describes the models used to determine areas of heightened risk with the areas as defined in OAR 860-300-0020 (1)(a)(A)+(B). The models shall take into account risks factors mentioned below not yet incorporating the utility's assets and ignition drivers.
  - This section includes references to risk quantification processes and terminology used in UM2340 work to harmonize risk quantification among the IOUs.
  - IOUs should incorporate aspects being detailed in the models, including explicitly demonstrating landscape risk, fire ignition and spread modeling methods and their impact to inclusion of areas with elevated landscape risk, and subsequently exposing the ignition/spread modeling to various credible climate conditions (including the basis for their selection).
  - Each of these steps should be distinctly supported with a detail description of the geospatial and tabular dataset used in the analysis encompassing the areas as defined in OAR 860-300-0020 (1)(a)(A)+(B).
  - The utilities shall provide at a minimum the details below outlining the processing element for the geospatial and tabular datasets used in the baseline/environmental risk analysis. This information could be provided in a detailed data table.
    i. Provide information on the data source, spatial resolution, temporal resolution, timeframe of data, and data units.
    ii. If applicable, include a description of any probability density functions, percentiles, or other ranking methods used.
    iii. Describe any methods taken to bin or group individual datasets into various extreme, moderate and limited risk.
    iv. Anytime datasets are combined to create a new dataset, include a description of how each dataset is combined and/or weighted to create the new dataset.
    v. Utilities shall provide an explanation and the rational for any datasets which are used more than once within the analysis.
  - Once results are compiled into a final baseline/environmental geospatial risk file please detail how the Company analyzes the data into various extreme, moderate and limited risk. Include details of the company's basis for this determination (for instance, should IPC continue to define yellow and red risk zones, detail how such a determination is supported by the quantified or subjective inputs).

- Include details of how the company performs sensitivity analyses, quality assurance, and stress testing to ensure accuracy.
- Include maps of the company's service territory and its existing or new HFRZ areas as well as its Utility Wildfire Risk Areas[1].

OAR 860-300-0020 (1)(b)
Identified means of mitigating wildfire risk that reflects a reasonable balancing of mitigation costs with the resulting reduction of wildfire risk.

- UM2340_2502: The utilities should evaluate current and planned mitigation projects against the results of the modified RSE method currently under development in UM 2340. A crosswalk of these projects should be contrasted against the Phase 2 RSE results. Utilities should provide an evaluation of the findings in an effort to help guide the future modifications to the RSE process.
- UM2340_2503: All utilities should calculate utility risk at a zone of protection or circuit segment level derived from pre-mitigation measure risk and post-mitigation measure risks; this calculation should not be used to redefine their service territory which was designated as HFRZ.
- UM2340_2504: Utilities should collaborate jointly to establish peer-reviewed methods for calculating the ignition risk driver reductions for various mitigation initiatives, building upon work being conducted in docket UM 2340. Elements which should be evaluated include: the percentage of effectiveness for the ignition risk driver, the duration for which the effectiveness is assumed to be applied, whether the effectiveness varies over its life, what the expected life of the measure is. Since this is expected to evolve over time, provide the underlying assumptions of effectiveness and the basis for that estimation as an Appendix to the WMP Multi-year Plan. Should any calculations for mitigation initiative effectiveness estimates be developed using utility-specific values, identify the utility-general values and explain the basis for the variation chosen by the utility.

OAR 860-300-0020 (1)(d)
Discussion of the outreach efforts to regional, state, and local entities, including municipalities, regarding a protocol for the de-energization of power lines and adjusting power system operations to mitigate wildfires, promote the safety of the public and first responders, and preserve health and communication infrastructure.

- UM2340_2505: The utilities should clearly identify their method of public safety partner administration, including: (1) who they define as public safety partners (PSP) (and its adherence or variance from OAR 860-024-0060), (2) how they maintain contact lists for each of those partner organizations, (3)

[1] At this time Utility Wildfire Risk Area is the location where HFRZ and utility assets that can result in wildfire risk, i.e. the intersection of HFRZ with overhead electric assets.

how often they meet with those representatives, (4) how they augment the PSP contacts incorporating the unique characteristics of the communities being served, (5) the feedback regarding the effectiveness of any interactions including workshops, tabletops etc., (6) where appropriate, their use of Community Based Organizations (CBOs) or other community organizations to complement any PSPs for the locale, and (7) how they leverage all community outreach relationships to improve its communication effectiveness.

OAR 860-300-0020 (1)(e)
Identified protocol for the de-energization of power lines and adjusting of power system operation to mitigate wildfires, promote the safety of the public and first responders, and preserve health and communication infrastructure.

- UM2340_2506 (Future Topic): Discuss how the Company considers outage impacts for vulnerable customer segments including ones who use electricity to power medical devices and those that are considered critical customers. Include how the company models those locations against HFRZs and how the utility considers critical facilities in its risk modeling and mitigations approaches.

OAR 860-300-0020 (1)(g)
Description of procedures, standards, and time frames that the Public Utility will use to inspect utility infrastructure in areas the Public Utility identified as heightened risk of wildfire.

- UM2340_2507 (Future Topic): The companies shall utilize work developed in UM 2340 and any subsequent risk quantification efforts to determine how to evaluate the cost-effectiveness, cadence, location and timing of inspection programs, including Ignition Prevention Inspections as well as other inspection types to establish proper risk/reward activities are being conducted.

OAR 860-300-0020 (1)(h)
Description of the procedures, standards, and timeframes that the utility will use to carryout vegetation management in areas it has identified as heightened risk of wildfire.

- UM2340_2508 (Future Topic): The utilities and Staff will work together to determine whether consistent vegetation inspection and correction procedures can be achieved, depending upon the relevant jurisdiction or land manager restrictions. This could result in consistent identification of line miles and locations needing to be trimmed, specific trees needing removal, areas where herbicides or other treatments should be performed, urgency of each of these actions, and estimated costs, etc. After inspection efforts are

completed include work done in response to inspection findings, when the work was performed or if additional or less work was completed and the basis for that action and actual costs.

- UM2340_2509 (Future Topic): The utilities should continue to work with communities regarding the importance of healthy trees that do not pose risks to overhead electric assets, including the provision of information that helps

OAR 860-300-0020 (1)(j)
Description of participation in national and international forums, including workshops identified in section 2, chapter 592, Oregon Law 2021, as well as research and analysis the utility has undertaken to maintain expertise in leading edge technologies and operational practices, as well as how such technologies and operational practices have been used to develop and implement cost effective wildfire mitigation solutions.

- UM2340_2510 (Future Topic): The IOU's shall participate in Staff-facilitated periodic wildfire mitigation best practice meetings. During these meetings, subject matter experts will be asked to outline their current practices for various topics. These discussions will include detailed descriptions of the manner in which the utility is conducting the topic work and will enable increased knowledge of the various activities and their relationship to mitigating wildfire. Specific topics could include: covered conductor installations and challenges, the role of advanced coordination in reducing wildfire risk while maximizing reliability, vegetation management, risk modeling methods and current and future data needs, rapid deployment strategies and mitigation measures which support such an approach, etc.

OAR 860-300-0020 (1)(k)
Description of ignition inspection programs, as described in Division 24 of these rules, including how the utility will determine, and instruct its inspectors to determine conditions that could pose an ignition risk on its own equipment and pole attachments.

- UM2340_2511 (Future Topic): The company shall include in its Multi-Year WMP a detailed description of how it tracks and investigates reportable and non-reportable ignition events. The company shall include details regarding any root cause analysis performed, equipment failure findings, at a minimum as required in FM 221. The utility may choose to evaluate other ignition events which may inform its wildfire risk insights but should explain how those not required by OARs are incorporated into their ignition risk estimations.