ORDER NO. 25-326

ENTERED Aug 20 2025

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 August 19, 2025 Regular Public Meeting, to adopt Staff's recommendation in this matter. The Staff Report with the recommendation is attached as Appendix A.

We recognize that the Multi-year Wildfire Mitigation Plan Shared Format, and as discussed at the public meeting, Sections 4.3 and 4.4 and Table OPUC 4-2, regarding asset and outage risk analyses in particular, are intended to generate the best available information. We also recognize that there will be ongoing evolution in these efforts, and we primarily are seeking to consolidate discussions utilities have incorporated in past plans into a single location in each plan. We expect these efforts to be stakeholder facing, answering some of the high-level questions communities ask about risk identification. We do not expect standardized risk evaluations across the utilities at this time. We reiterate our expectation that utilities will make their best efforts in communicating this information, recognizing the iterative nature of the work in this docket, that the shared format template will continue to evolve.

Made, entered, and effective Aug 20 2025.

Letha Tawney
Chair

Les Perkins
Commissioner

COMMISSION POWER WAS UNAVAILABLE FOR SIGNATURE

Karin Power
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. RA1

PUBLIC UTILITY COMMISSION OF OREGON
STAFF REPORT
PUBLIC MEETING DATE: August 19, 2025

REGULAR X CONSENT ____ EFFECTIVE DATE N/A

DATE: August 12, 2025

TO: Public Utility Commission

FROM: April Brewer and Heide Caswell

THROUGH: Bryan Conway **SIGNED**

SUBJECT: OREGON PUBLIC UTILITY COMMISSION:
(Docket No. UM 2340)
Phase 2 WMP Standardization of Elements: Shared Terminology and Format for Multiyear Wildfire Mitigation Plans.

STAFF RECOMMENDATION:

The Public Utility Commission of Oregon (Commission) should approve the Wildfire Mitigation Plan (WMP) Phase 2 Standardization of Shared Terminology and Format for Multiyear Wildfire Mitigation Plans for use by investor-owned electric utilities, subject to Staff-proposed modifications.

DISCUSSION:

Issue

Whether the Commission should approve the following proposed Wildfire Mitigation Plan (WMP) elements, subject to Staff-proposed modifications:

- WMP Glossary of Shared Terminology, and
- Multi-year Plan Standardized Format.

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.

ORS 757.960 through 757.969, establish standards for investor-owned electric utility's Wildfire Mitigation Plans and directs the Commission to evaluate electric companies' risk-based wildfire mitigation plans and planned activities to protect public safety, reduce risk to utility customers, and promote electrical system resilience to wildfire damage.

Analysis

Background

Order No. 24-260 initiated the investigation into guidelines for Wildfire Mitigation Plans and established Docket No. UM 2340, based on recognition that a Commission-led evolution of wildfire mitigation plans was necessary. The identified elements for improvement were divided into two phases, with specific content for each, as shown in Table 1 on the following page.

Table 1: Summary of Joint Recommendations Adopted in July 2024 with August 2025 Status.

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

In Phase 1, Staff developed, and the Commission approved: WMP Planning Cycle guidelines, WMP Update Guidelines, and WMP Data Guidelines. These guidelines were intended to bring a level of plan specificity which had been previously inconsistently delivered. In Phase 2, activities include work led by Portland General Electric, Pacific Power (PacifiCorp), and Idaho Power, collectively, the Joint Utilities. This work included creation of a glossary of shared terminology to be used in all WMPs and a standard format for multi-year WMPs. Staff still believes that implementation of the WMP glossary and multi-year format template will increase consistency and fungibility for reviewing plans by Commissioners, Staff, and stakeholders; ultimately facilitating more meaningful conversations surrounding wildfire risk in Oregon.

On June 13, 2025, the Joint Utilities created and filed to the docket their proposed

[1] Docket No. UM 2340, Order No. 24-326.

standardized elements. Staff appreciates the work of the joint utilities in establishing a template wildfire mitigation plan format. Staff and consistent terminology, and applauds efforts aligning the format against the data template workbook. Staff believes this approach sets us on a path toward evolution of the plans which will benefit stakeholders, regulators, and the utilities as we continue to learn how best to conduct wildfire mitigation work.

Staff reviewed the proposal for the WMP glossary and multi-year plan format and compared it with approved recommendations from the 2025 WMP Plan Update, evaluated work underway in UM 2340 regarding the development of risk valuation, and made certain recommendations for incorporation of these items in the Joint Utility proposal. Staff provided comments to the docket on July 11, 2025, which highlighted Staff suggestions to the Joint Utility standard format.

Subsequently, on July 25, 2025, the Joint Utilities filed their revised proposals incorporating feedback from Staff as well as other stakeholders.

Stakeholder Comments on WMP Glossary and Multi-year Plan Standardized Format
Comments were received from the Northwest Energy Coalition (NWEC), Oregon Citizens' Utility Board (CUB), Verde, and Community Energy Project (CEP), collectively the Joint Advocates, and AiDash. In previous comments it was clear that additional time was necessary to provide thoughtful and timely input into the WMP evolution process. As a result additional time was factored into the calendar for stakeholder comments. Generally, stakeholder comments were supportive of the harmonization or standardization of the WMPs, flagged the importance of more objective data and provided certain recommendations to improve clarity. In certain cases, stakeholder comments may have surfaced the need for further conversation about how best to incorporate the suggestions, but Staff hesitated to fully incorporate them into definitions. For example, public safety partners have a very specific meaning and while it's very important that in areas where other community resources may serve a similar function (like a church or school acting as point of gathering information), Staff is concerned that changing the definition of public safety partner could have unintended consequences. Staff suggest that a new term be developed during upcoming workshops, which can then be adapted into future versions of the WMP standardized elements.

Staff Recommendation on WMP Glossary
Staff's recommended changes to the Joint Utility's revised proposal for a WMP glossary of shared terminology are included, in redline, in Attachment A. Staff acknowledge that its recommended changes to the Commission are not an exhaustive list of all concerns held by stakeholders, but believes that the issues discussed below are the key changes required to ensure consistent language across WMPs.

Largely, these changes were intended to provide further clarity and consistency and include:

1) Circuit miles is more explicitly defined when circuits share structures,
2) Designation that distribution voltages are limited to 34.5 kV (consistent with IEEE definition),
3) Flagged that the grid operations practices included in WMPs are limited to those which impact wildfire operations,
4) Refined the designation of hazard exposure based on stakeholder input (recognizing it had previously been called out as exposure, more generally),
5) More precisely identified HFRZs to associate with the naming conventions used by the utilities and excluded areas of interest from the HFRZ since these locations have not yet (and may not) been advanced to HFRZ classification,
6) More specifically identified HFRZ Zone ID to align with the data template workbook, 7) edited ignition likelihood to allow the factor to be expressed with alternative time periods (not just annual rates),
8) More specifically detailed priority findings, recognizing utilities' operational criteria may vary and that findings requiring immediate response may be subcategorized as a variant of an A priority,
9) Incorporated sensitive settings to recognize the broad term (suggested by stakeholders) for the actions being taken to adjust protective devices, for which each utility has slightly different names and setting practices,
10) Identified how utilities may incorporate additional explanations regarding their methods for gauging wildfire hazards to stakeholders.

Staff Recommendation on Multi-year Plan Standardized Format
Staff's recommended changes to the Joint Utility's revised proposal for a multi-year standard format are included, in redline, in Attachment B. They are largely the result of comparing the Joint Utilities' Standardized Format and the ordered recommendations in Order Nos. 25-233, 25-234, and 25-235 to detail where these items should be placed to be consistent with the structure established by the Joint Utilities. Consistent with the recommendations made to the WMP Glossary, Staff recommendations for the standard format are focused on ensuring clarity, transparency and inclusion of tables or text that incorporate requirements ordered. They are detailed in Table 2 below and include:

1) Incorporation of actual expenditures from prior WMP work into its overview of its plan,
2) Explicit inclusion of grants that support WMP implementation,
3) Explicit inclusion of WMP program delivery (i.e. units accomplished,
4) Detailed discussion of updated targets based on recent efforts,

5) Designated how the results of risk analysis needed to be clearly contained within the WMP,
6) Defined more specifically how outages and the analysis done by the utility should be demonstrated within the WMP,
7) Detailed how and where asset risk analysis would be discussed in the standard format,
8) Identified where circuit segment risk results,
9) Created specific appendices for inclusion of ordered elements, such as maturity model and detailed HFRZ maps .

Table 2 contains the 2025 WMP Update recommendations, adopted in Order Nos. 25-233, 25-234, 25-235, as well as the location at which the requirement is addressed.

Table 2: Adopted Recommendations for Incorporation into 2026-2028 Multi-year Plans[2]

Plan Element	ID[3]	Topic	Timing
MYP/ Appendix F	ALL_2502	Program Maturity	2026 WMP
MYP Shared Terminology, Definitions	ALL_2503	Program Administration & Plan Transparency	2026 WMP
MYP Section 4.3	ALL_2504	Ignition Risk Quantification	2026 WMP
MYP/ Appendix D	ALL_2507	Program Administration & Plan Transparency	2026 WMP
MYP Section 2.2.1	ALL_2508	Program Administration & Plan Transparency	2026 WMP
MYP Section 2.3.1 and Relevant Initiative Sections and Data Template Workbook	ALL_2509	Initiative Tracking	2026 WMP
MYP Section 2.3 and Data Template Workbook	ALL_2510	Program Administration and Plan Transparency	2026 WMP
MYP Section 13 and Appendix E	ALL_2511	Communication Effectiveness	2026 WMP
MYP Sections 11 and 12	ALL_2512	Community Resilience Support	2026 WMP

[2] These requirements were contained as Attachment B in each of Orders 25-233, 25-234 and 25-235.
[3] Recommendation ID assigned in applicable WMP memo.

UM 2340 Next Steps
Staff notes again that while the WMP glossary and standard format for multi-year plans moved the Joint Utilities toward a more consistent representation of their wildfire mitigation efforts, the work reflected in these documents continues to progress. Staff anticipate that updates may be needed to these documents as well as the existing WMP guidelines in the future to reflect efforts directed by the Commission in adoption of the 2025 WMP Updates. Staff will continue to collaborate with the Joint Utilities to amend the standard format to incorporate those advancements.

Conclusion

Staff appreciates the advancements made in standard terminology and consistent WMP structure, as well as its alignment with the data template workbook. Staff believes substantial progress was made by the Joint Utilities and built upon with Staff's incorporation of recommendations from Order Nos. 25-233, 25-234 and 25-235. Staff recommends the Commission adopt the proposed WMP shared terminology and standard template as set forth in Attachment A.

PROPOSED COMMISSION MOTION:

Approve the following Wildfire Mitigation Plan standardization of elements work for use by the investor-owned electric utilities, subject to Staff's proposed modifications:

- WMP Glossary of Shared Terminology, and
- Multi-year Plan Standardized Format.

Wildfire Mitigation Plan
Shared Terminology

The following table provides a glossary of shared terminology that will be used in Wildfire Mitigation Plans:

Term	Acronym	Definition
Access and functional needs populations		Per Oregon Code- 411-425-0055, Oregon Needs Assessment/OR Dept of Human Services Access and functional needs populations includes individuals with developmental disabilities, physical disabilities, chronic conditions, limited English proficiency and low income.
After Action Review	AAR	A structured process used to analyze actions after a project or event to identify what worked well, what didn't, and how to improve in the future.
Area of Interest	AOI	Identified area which is being observed as elevated risk but has not been incorporated into the utility's HFRZ.
Artificial Intelligence	AI	The simulation of human intelligence in machines.
Asset (utility)		Electric lines, equipment, or supporting hardware.
Bonneville Power Administration	BPA	A federal agency and a major supplier of electricity and transmission services in the Pacific Northwest, part of the United States Department of Energy.
Bureau of Land Management	BLM	An agency within the United States Department of the Interior responsible for administering United States. federal lands.
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). If different circuits are co-located on structures, each circuit's length is separately accounted for. This factor may be referenced to create context for risk footprint as well as ~~Primarily referenced~~ w~~w~~hen addressing mitigations like reconductor or underground conversion.
Communications		Media that communicate voice, data, text, or video over a distance using electrical, electronic, radio, microwave, or light wave transmissions.
Community Based Organization	CBO	A public or private nonprofit organization that is representative of a community or significant segments of a community and engaged in meeting that community's needs in the areas of social, human, or health services. Per OAR 410-180-0305, see also OAR 581-017-0651.
Community Outreach & Public Awareness	COPA	A WMP initiative category to capture how utilities are building partnerships, understanding communication styles, and addressing community needs.

Term	Acronym	Definition
Community Resource Center	CRC	Facilities that provide critical information to customers impacted by outages. The CRC may also provide impacted customers with access to other services such as device charging, internet access, clean water, and ice.
Consequence		The adverse effects from an event; may consider the hazard intensity, community exposure, ~~and~~ local vulnerability or other factors.
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	Acronym	Definition
Critical facilities and infrastructure		Facilities and infrastructure that operate at the community level and 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 nominal 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 municipal 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		A person who has applied for, been accepted, and is currently receiving electric service.
Customer-meters		Delivery point from electric utility to customer receiving service.
Customer Average Interruption Duration Index	CAIDI	The average time required to restore service.
Customer hours interrupted		Sum of customer minutes of interruption divided by 60 (e.g., of power outage).

Term	Acronym	Definition
Dead fuel		Fuel with no living tissue in which moisture content is governed almost entirely by atmospheric moisture (relative humidity and precipitation), dry-bulb temperature, and solar radiation.
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. Per OAR 860-024-0011 (1)(A).
Distribution line		Refers to all lines below or equal to 34.5~~50~~kV unless otherwise noted. ~~Per OAR 860-024-0018 (3)(b).~~
Department of Energy	DOE	A federal agency in the United States responsible for developing and implementing national energy policy and managing the country's nuclear infrastructure.
Early Fault Detection	EFD	Identification of potential equipment or system faults on the power grid before outages or major failures occur.
Edison Electric Institute	EEI	A trade association that represents all U.S. investor-owned electric companies.
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.
Electric Power Research Institute	EPRI	An organization in the United States that conducts research, development, and demonstration projects for the benefit of the public.
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.)
Emergency Management Team	EMT	A group of individuals responsible for coordinating activities to mitigate, prepare for, respond to, and recover from emergencies and disasters.
Emergency Support Function-12	ESF-12	Indicates the Public Utility Commission of Oregon's role in supporting the State Office of Emergency Management for energy utilities' issues during an emergency.

Term	Acronym	Definition
Energy Release Component	ERC	A number related to the available energy per unit area within the flaming front at the head of a fire. It is a calculated output of the National Fire Danger Rating System (NFDRS). ERC is used to estimate the potential heat output of a fire and is an important factor in predicting fire behavior.
~~Sensitive Settings~~ ~~**Enhanced Safety Settings**~~ ~~**or**~~ ~~**Enhanced Protection Settings**~~ ~~**or**~~ ~~**Enhanced Powerline Safety Settings**~~	 ~~ESS~~ ~~EPS~~ ~~EPSS~~	~~Advanced safety settings implemented by electric utilities on electric utility powerlines to reduce wildfire. While electric utility programs are similar, this does not imply identical enhanced protection settings for the devices performing these functions.~~ ~~Enhanced Safety Settings (ESS): PacifiCorp~~ ~~Enhance Protection Settings (EPS): Idaho Power~~ ~~Enhanced Powerline Safety Settings (EPSS): Portland General Electric~~
Equipment ignition likelihood		The likelihood that utility-owned equipment will cause an ignition through either normal operation (such as arcing) or failure.
Estimated Restoration Time **or** **Estimated Time of Restoration**	ERT ETR	The projected time when power or other services are expected to be restored after an outage.
European Centre for Medium-Range Forecasts	ECMWF	An independent intergovernmental organization supported by most of the nations of Europe to provide accurate global weather forecasts.
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.~~
Fall-in hazard		A term used to describe a tree that has the potential to impact powerlines and other equipment.
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 High Consequence Area	FHCA	See High Fire Risk Zone.

Term	Acronym	Definition
Fire intensity		A general term relating to the heat energy released by a fire.
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).
Fire weather		Weather conditions that influence fire ignition, behavior and suppression.
Fire Weather Watch	FWW	Issued by the NWS when the combination of dry fuels and weather conditions support extreme fire danger within the next 72 hours.
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.
Frequently Asked Question	FAQ	A list of common questions and their answers.
Functional exercise	FE	Exercises that examine or validate coordination, command, and control between various agencies. FE exercises are larger scale, last much longer (e.g., multiple days), require significantly more planning and coordination, and include deployment of resources to practice protocols and processes.
Geographical Designated Area (ID and Name)		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).
Geographic Information System	GIS	A computer system that analyzes and displays geographically referenced information.
Goals		The electrical corporation's general intentions and ambitions related to their Wildfire Mitigation Plan, unless noted otherwise.

Term	Acronym	Definition
Great Basin Coordination Center	GBCC	The focal point for coordinating resources for wildland fire and other incidents through the Great Basin.
Grid Design & System Hardening	GDSH	A WMP initiative category to capture how utilities are designing and strengthening distribution, transmission, and substation infrastructure to reduce ignition risk, potential wildfire impacts, and potential PSPS impacts.
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.
Grid Operations & Protocols	GOP	A WMP initiative category to capture how utilities are implementing operations and protocols to reduce wildfire risk across their systems. Other Grid Operations & Protocols~~,~~ not relevant to wildfire risk reduction are not included within this initiative category.
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.
Hazard 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.
HFRZ Ignition Prevention Inspection		See Ignition Prevention Inspection
HFRZ- Sub-area		If the reporting utility has more than one subarea distinction for levels of Wildfire Risk, indicating elevation of fire risk, for example . ~~(For example,~~ Tier 1, Tier 2 or Tier 3, or Yellow and Red Risk Zones 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~~)~~. In the Data Template Workbook, this is identified as an HFRZ Geographic Indicator.

Term	Acronym	Definition
High Fire Risk Zone ~~**or**~~	HFRZ	Geographic areas identified by Operators of electric facilities in their risk-based wildfire plans per OAR 860-024-0018, as areas potentially subject to heightened fire risk relative to other areas in the utility's service territory.
Fire High Consequence Area **or** **Wildfire Risk Zone**	FHCA WRZ	Each IOU has its own naming convention for these areas. HFRZ: Portland General Electric FHCA: PacifiCorp WRZ: Idaho Power
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 a causative event.
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.
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-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-and 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.
HWW Only/ 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.

Term	Acronym	Definition
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. This can be expressed for specific time periods (i.e., fire season, quarters or rates).
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 that shall be subject to correction timeframes per OAR 860-024-0018(5).
Ignition Prevention Inspection	IPI	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 may~~can~~ be combined with other safety or detailed inspections that may be~~as~~ required by rule, per OAR 860-024-0001(6) and 860-024-0018(3)(a).
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.
Incident Management Team	IMT	A rostered group of qualified personnel responsible for responding to incidents and emergencies.
Industry Engagement	IE	A WMP initiative category to capture how utilities are participating in forums, sharing best practices or learnings, and conducting research and analysis related to emerging technologies / practices.

Term	Acronym	Definition
Initiative		Measure or activity, either proposed or in process, designed to reduce the consequences and/or probability of wildfire or PSPS.
Inspect / Correct	IC	A WMP initiative category to capture how utilities are implementing systematic field inspections and corrections to identify and mitigate wildfire ignition risks associated with utility infrastructure.
Institute of Electrical and Electronics Engineers	IEEE	A technical professional organization dedicated to advancing technology for the benefit of humanity.
Integrated Reporting of Wildland Fire Information	IRWIN	A system designed to facilitate sharing of data between various applications, providing an "end-to-end" fire reporting capability.
International Organization for Standardization	ISO	A non-governmental organization that develops and publishes international standards related to technology and manufacturing.
International Wildfire Risk Mitigation Consortium	IWRMC	A global collaborative utility effort to share data, information, and practices related to wildfire risk mitigation.
Investor-Owned Utility	IOU	An investor-owned entity acting as a public utility.
Light Detection and Ranging	LiDAR	A remote sensing method that uses light in the form of a pulsed laser to measure ranges to earth.
Line miles or Pole miles		The number of miles of transmission and/or distribution circuits in linear miles, regardless of the number of circuits. Primarily referenced in the context of planning circuit routes and vegetation management.
Local community		Any community of people living, or having rights or interests, in a distinct geographical area.
Local emergency management		Refers to city, county, and Tribal emergency management entities.
Medically vulnerable customers		A medically vulnerable customer is a person who is critically dependent on electrically powered equipment. Such customers may be particularly vulnerable due to advanced age or physical, sensory, intellectual or mental health that they may need life protecting devices and assistive technologies to support independent living and may possess a medical certificate as dictated under OAR 860-021-0410.
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.
Momentary Average Interruption Frequency Index	MAIFI	The total number of customer momentary interruptions divided by the total number of customers served.

Term	Acronym	Definition
National Fire Danger Rating System	NFDRS	A fire assessment system used in the United States to provide a measure of the potential for wildfires based upon current and predicted conditions.
National Incident Management System	NIMS	A systematic, proactive approach to guide all levels of government, nongovernment organizations, and the private sector to work together to prevent, protect against, mitigate, respond to, and recover from the effects of incidents. NIMS provides stakeholders across the whole community with the shared vocabulary, systems, and processes to successfully deliver the capabilities described in the National Preparedness System. NIMS provides a consistent foundation for dealing with all incidents, ranging from daily occurrences to incidents requiring a coordinated federal response.
National Interagency Fire Center	NIFC	A facility in Boise, Idaho, where employees of multiple national and state agencies work together to ensure wildland fire personnel across the United States receive the support and information they need.
National Oceanic & Atmospheric Administration	NOAA	A science-based federal agency within the United States Department of Commerce with regulatory, operational, and information services responsibilities related to the earth's environment.
National Weather Service	NWS	A government agency that provides weather, water, and climate forecasts and warnings for the United States, its territories, adjacent waters, and ocean areas.
Near term wildfire risk		Elements of wildfire risk that are expected to fluctuate on a daily or weekly basis. Examples include temperature, humidity, and wind.
Non-High Fire Risk Zone	Non-HFRZ	An area that is not designated as an HFRZ.
Non-routine vegetation management		Vegetation management removal or treatment programs conducted as non-cycle work, not generally associated with clearance compliance with OAR 860-024-0016.
Northwest Coordination Center	NWCC	The geographic coordination center for the Northwest Region, including Oregon and Washington. The center serves as the focal point for interagency resource coordination, logistics support, aviation support, and predictive services involved in wildfire fire management and suppression.
Operations and Maintenance	O&M	A set of activities involved in managing and maintaining facilities.
Oregon Administrative Rule	OAR	Rules adopted~~created~~ by Oregon's agencies, boards, and commissions to implement and interpret relevant responsibilities their statutory authority.

Term	Acronym	Definition
Oregon Department of Emergency Management	OEM	A state agency that leads statewide efforts to develop and enhance preparedness, response, recovery, and mitigation capabilities.
Oregon Department of Forestry	ODF	A state agency that performs a variety of functions related to the management, regulation, and protection of public and private lands.
Oregon Department of Human Services	ODHS	A state agency that provides services to help Oregonians achieve well-being and independence.
Oregon Department of Transportation	ODOT	A state agency that provides a safe and reliable multimodal transportation system.
Oregon Joint Use Association	OJUA	An association comprised of pole owners and pole users representing electric utilities, communications companies, and government agencies.
Oregon Public Utility Commission	OPUC	The agency responsible for rate regulation of Oregon's investor-owned electric utilities, natural gas utilities, telephone service providers, as well as select water companies. The PUC enforces electric and natural gas safety standards, handles utility-related dispute resolution, and participates in the Oregon Emergency Response System.
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.
Overhead	OH	Typically used to differentiate overhead electrical circuits from underground circuits.
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. Per 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.
Pole		Any pole that carries distribution lines and that is owned or controlled by a public utility, telecommunications utility, or consumer-owned utility.
Pole miles		See Line miles

Term	Acronym	Definition
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 per OAR 860-024-0012(1). Within Priority A findings, if subclassifications exist to prompt immediate response, (such as coding the finding as an I priority) the utility must report these conditions separately. Each utility may utilize its own methods~~designation~~ to identify findings that meet this ~~fall within this definition~~category.
Priority B findings		The Operator must correct violations of Commission Safety Rules no later than two years after discovery. Two Year Correction, Priority B, OAR 860-024-0012(2). Each utility may utilize its own methods to identify findings that meet this category.~~Each utility may utilize its own designation to identify findings that fall within this definition.~~
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). ~~Each utility may utilize its own designation to identify findings that fall within this definition.~~ Each utility may utilize its own methods to identify findings that meet this category.
Priority I findings		A corrective finding which requires immediate response for Imminent Conditions. Utilities will remain on site until the correction is completed. If this method is used, this finding is reported as a subtype of Priority A findings, i.e., Priority A-I.
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.

Term	Acronym	Definition
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".
Public Information Officer	PIO	The individual responsible for providing information to the public related to an organization or incident.
Public Safety Partners		Emergency Support Function-12, Local Emergency Management, and Oregon Department of Human Services (ODHS). Per OAR 860-300-0010(7).
Public Safety Power Shutoff	PSPS	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.
PUC Staff		Regulatory employees of the State Public Utility Commission, excluding commissioners and Administrative Law Judges. Staff serves as an advocate for the public interest and participates in proceedings.
PSPS/Emergency Preparedness		A WMP initiative category to capture how utilities are preparing for and executing emergency operations to mitigate wildfire risk and maintain public safety, including through Public Safety Power Shutoff (PSPS) events and broader emergency readiness strategies.
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.
Quality Assurance/Quality Control	QA/QC	The combination of proactive and reactive processes designed to prevent and correct defects.
Red Flag Warning	RFW	Issued by the NWS 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.
Regional Disaster Preparedness Organization	RDPO	A partnership of government agencies, non-governmental organizations, and private-sector stakeholders in the Portland Metropolitan Region collaborating to increase disaster resilience.

Term	Acronym	Definition
Remote Automated Weather Stations	RAWS	Self-contained, portable, and permanent, solar powered weather stations that provide timely local weather data used primarily in fire management. These stations monitor the weather and provide weather data that assists land management agencies with a variety of projects such as monitoring air quality, rating fire danger, and providing information for research applications.
Reportable Ignition		Per 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.
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, Tier 1 or Tier 2, or HFRZ and Areas of Interest.) HFRZ areas and relevant sub-categories, if applicable, as defined by the utility.
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.
Right-of-way	ROW	The legal right, established by usage or grant, to pass along a specific route through grounds or property belonging to another.
Risk		A measure of the anticipated adverse effects from a hazard considering the consequences and frequency of the hazard occurring.
Risk component		A part of an electric corporation's risk analysis framework used to determine overall utility risk.

Term	Acronym	Definition
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, and other events with potential to cause ignition.
Risk map		A collection of data sufficient to represent the spatial distribution (e.g., across a geography) of a given type of risk (i.e., the probability of an event and its consequence) and the spatial representation thereof.
Risk mapping algorithm		A risk mapping algorithm is a methodology for calculating risk levels from data inputs across a spatial display (i.e., map of geography).
Risk Methodology & Assessment	RMA	A WMP initiative category to capture how utilities are developing and using tools and processes to assess the risk of wildfire and PSPS across their service territory and/or other facilities.
Risk Spend Efficiency	RSE	Used by utilities to quantify and compare cost effectiveness of mitigation measures based on the ratio of the risk reduction to the mitigation cost. It is similar to a cost/benefit analysis using risk points and is calculated as Risk Reduction x Lifetime of Benefit/Total Cost.
Routine non-wildfire vegetation management		Vegetation management removal or treatment programs conducted as cycle work, generally associated with clearance compliance with OAR 860-024-0016.
Routine wildfire vegetation management		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.
Rural		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).

Term	Acronym	Definition
Sensitive Settings Enhanced Safety Settings or Enhanced Protection Settings or Enhanced Powerline Safety Settings	 ESS EPS EPSS	Advanced safety settings implemented by electric utilities on electric utility powerlines to reduce wildfire. While electric utility programs are similar, this does not imply identical enhanced protection settings for the devices performing these functions. Enhanced Safety Settings (ESS): PacifiCorp. Enhance Protection Settings (EPS): Idaho Power. Enhanced Powerline Safety Settings (EPSS): Portland General Electric.
Situation Awareness & Forecasting	SAF	A WMP initiative category to capture how utilities are leveraging real-time data, environmental intelligence, and predictive analytics to monitor and respond to wildfire conditions in order to reduce ignition risk and enhance operational readiness.
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.
Subject Matter Expert	SME	A professional who has advanced knowledge in a specific field.
Suburban		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. Suburban (31 to 93 customers per circuit kilometer or 50 to 150 customers per circuit mile).
Supervisory Control and Data Acquisition	SCADA	A system of hardware and software that enables an organization to control and monitor equipment, systems, and processes.
System Average Interruption Duration Index	SAIDI	The total number of minutes (or hours) of interruption the average customer experiences.
System Average Interruption Frequency Index	SAIFI	How often the average customer experiences an interruption.
Tabletop exercise		An activity in which key personnel, assigned emergency management roles and responsibilities, are gathered to discuss, in a non-threatening environment, various simulated emergency situations.
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.

Term	Acronym	Definition
Transmission & Distribution	T&D	Designation typically used to identify equipment, systems, and other assets used to transmit or distribute electricity.
Transmission line		Refers to all lines at or above 50 kV unless otherwise noted. Per OAR 860-024-0018 (3)(b).
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).
Tree inspection non-routine vegetation management		Vegetation management inspection programs conducted as non-cycle work, not generally associated with clearance compliance with OAR 860-024-0016.
Tree inspection routine vegetation management		Vegetation management inspection programs conducted as cycle work, generally associated with clearance compliance with OAR 860-024-0016.
Tribes / Tribal Nations		This term is used collectively to describe federally recognized Tribes within the Pacific Northwest.
United States Forest Service	USFS	An agency within the United States Department of Agriculture that administers the nation's national forests and grasslands.
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-Identified Critical Facilities	UICF	Facilities the Public Utility identifies that, because of their function or importance, have the potential to threaten life safety or disrupt essential socioeconomic activities if their services are interrupted. Communications facilities and infrastructure are to be considered Critical Facilities.
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. Also, a WMP initiative category to capture how utilities are implementing vegetation management programs to reduce ignition risk.

Term	Acronym	Definition
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.
Weather Research & Forecasting	WRF	A state-of-the-art mesoscale numerical weather prediction system designed for both atmospheric research and operational forecasting applications.
Wildfire hazard		The combination of ignition risk and fire spread resulting in a wildfire consequence. Each utility may provide additional explanation to inform stakeholders of how this designation is quantified ~~context for the use of this term~~ within their WMPs.
Wildfire Mitigation Plan	WMP	Same as a "wildfire protection plan" and refers to the document filed with the Commission relating to an electric utility's risk-based plan designed to protect public safety, reduce the risk of utility facilities causing wildfires, reduce risk to utility customers, and promote electric system resilience to wildfire damage. Per OAR 860-300-0010(11).
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 Mitigation Strategy Development	WMSD	A WMP initiative category to capture how utilities are developing and using processes for deciding on a portfolio of mitigation initiatives. This initiative includes WMP development, reporting, and compliance related activities.
Wildfire risk		The likelihood of a wildfire occurring and the potential impact a wildfire could have.
Wildfire Risk Zone	WRZ	See High Fire Risk Zone
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 7 A.

Term	Acronym	Definition
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.
Work order	WO	A prescription for asset or vegetation management activities resulting from asset or vegetation management inspection findings.
Zone of Protection	ZOP	The area or segment of an electrical power system that is protected by a particular protective device or protection system.

Multi-Year Wildfire Mitigation Plan Shared Format

Contents

List of Tables

1 Executive Summary

In the opening section of the multi-year Wildfire Mitigation Plan (WMP), the electrical utility shall provide an executive summary. The electrical utility may summarize the primary goal, plan objectives, and framework for the development of the multi-year WMP for the three-year cycle.

2 Overview of the WMP

2.1 Goals and Objectives

Each electrical utility will state the primary goal of its multi-year WMP and summarize its plan objectives over the three-year WMP cycle. Plan objectives are determined by the activities proposed in the multi-year WMP.

2.2 Prior and Projected Expenditures

The electrical utility will summarize its historic and forecasted~~projected~~ expenditures in thousands of U.S. dollars per year for the activities set forth in its prior and three-year WMP cycle in tabular form.

Table OPUC 2-1~~X~~: ~~"title"~~WMP Expenditures in Thousands

	~~Initiative Category Expenditures~~									
Initiative Category	Prior WMP Spend (as of "Date")		"Year 1"- Forecast		"Year 2" - Forecast		"Year 3" - Forecast		Total	
	Capital ($1,000)	O&M ($1,000)	Capital ($1,000)	O&M ($1,000)	Capital ($1,000)	O&M ($1,000)	Capital ($1,000)	O&M ($1,000)	Capital ($1,000)	O&M ($1,000)
Community Outreach and Public Awareness (COPA)										
PSPS/Emergency Preparedness (PSPS)										
Grid Design and System Hardening (GDSH)										
Grid Operations and Protocols (GOP)										
Industry Engagement (IE)										
Inspect/Correct (IC)										
Overview of the Service Territory (OST)										

~~Initiative Category Expenditures~~										
Initiative Category	Prior WMP Spend (as of "Date")		"Year 1"- Forecast		"Year 2" - Forecast		"Year 3" - Forecast		Total	
	Capital ($1,000)	O&M ($1,000)	Capital ($1,000)	O&M ($1,000)	Capital ($1,000)	O&M ($1,000)	Capital ($1,000)	O&M ($1,000)	Capital ($1,000)	O&M ($1,000)
Risk Methodology and Assessment (RMA)										
Situational Awareness and Forecasting (SAF)										
Vegetation Management (VM)										
Wildfire Mitigation Strategy Development (WMSD)										
Other										
Total										

~~The electrical utility will include grant impacts to project costs and customer rates, as well as how the Company will manage reimbursement, and any adjustments due to funding delays. To the extent grant details are in other sections, the locations will be referenced.~~

2.2.1 WMP Grants

The electrical utility will include grant impacts to project costs and customer rates, as well as how the Company will manage reimbursement~~,~~ and any adjustments due to funding delays. To the extent grant details are in other sections, the locations will be referenced.

Table OPUC 2-2: WMP Grant Overview

Grant Name	WMP Project/Initiative	Awarding Agency	Awarded Amount ($1,000)	Timeline	Status	Comment	Report Reference Section
Grant Total							

2.3 WMP Program Delivery

Track the historical and forecasted annual equipment upgrades by various material mitigation types (CFCI's installed, miles of spacer cable, miles of covered conductor, etc.~~...~~), including a comparison of projected and actual unit completion amounts by year.

Table OPUC 2-3: Asset Unit Delivery

Mitigation Asset	2020-2023 Planned	2020-2023 Actual	2024 Planned	2024 Actual	2025 Planned	2025 Actual	2026 Planned	2026 Actual	2027 Planned	2027 Actual	2028 Planned	2028 Actual
ex: CFCI Installed												
ex: Covered Conductor (not spacer cable)												
ex: Spacer Cable												
ex: Distribution Pole Replace												
ex: Transmission Pole Replace												
ex: Weather Station												
ex: Wildfire Detection Camera												

2.3.1 WMP Program Delivery Target Updates

To the extent that an initiative is delayed, provide any initiative delivery target adjustment at a summary level, including impact to units, cost and general explanation of the change, as well as whether the delay will be resolved within the year or if delays are expected to continue into future years. At a high level, subjectively identify how any ongoing delays may affect risk reduction for the system. To the extent that an individual initiative's accomplishments, forecasts, and actuals are inconsistetant with prior WMP's or WMP Updates, provide additional information within the specific initiative section.

3 Overview of the Service Territory

3.1 Service Territory

The electrical utility will provide a high-level description of its service territory, including the following components:

- Area served (in square miles),
- Number of customers served (customer-meters), and
- Overview of electrical infrastructure.

Table OPUC 3-1: Service Territory Components

Characteristic	HFRZ	Non-HFRZ	Total
Area Served (sq. mi.)			
Number of Customers			
Overhead Transmission circuit Circuit mMiles			
Overhead Distribution circuit Circuit milesMiles			
Underground Transmission circuit Circuit milesMiles			
Underground Distribution circuit Circuit milesMiles			
Substations			
Poles/Structures			

Table OPUC 3-2 ~~X~~: Oregon Service Territory Electrical Infrastructure

Asset	Overhead Circuit Miles	Overhead Poles/ Structures	Underground Circuit Miles	Total Circuit Miles	% Overhead Circuit Miles
## kV Transmission					
## kV Transmission					
## kV Transmission					
## kV Transmission					
## kV Transmission					
## kV Transmission					
## kV Transmission					
## kV Transmission					
## kV Transmission					
## kV Transmission					
## kV Transmission					
## kV Transmission					
## kV Transmission					
Total Transmission					
Total Distribution					

3.2 Electrical Infrastructure

In this section of the WMP, the electrical utility will provide key characteristics of its electrical infrastructure.

3.3 Wildfire Environment

The electrical utility will provide a brief narrative summarizing relevant wildfire history. For this section, wildfire history includes fires that are considered in WMP development.

4 Risk Methodology and Assessment

4.1 Overview

In this section, the electrical utility will present a high-level overview of its risk analysis approach. This includes a narrative explaining key elements of the approach and definitions of different risks and risk components.

4.2 Framework

In this section of the WMP, the electrical utility will provide an overview of its risk analysis framework.

4.2.1 HFRZ Analysis

Provide details around how the utility determines its HFRZ in accordance to

OAR 860-300-0020(1)(a)(A)&(B), including the model details and other elements as included in historical WMPs. (Include any specific detailed information previously provided in an appendix.)

4.2.23 HFRZ Results

In this section of the WMP, the electrical utility will share a high-level overview of the risks calculated using the approaches discussed in Section 4.2.

The results will include the following:

- Summary of electrical utility-identified high fire risk zones in the service territory and any changes.
- Map of the High Fire Risk Zone (HFRZ) (Include detail maps of each Geographical Designated Area in Appendix D).

4.3X Ignition Outage Risk Driver Analysis and Results

Provide an explanation for current and future approaches for establishing associations between legacy outage data and ignition risk drivers. This includes providing graphic and/or tabular depictions that clarify how the relationships are established 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.

4.4 Asset Risk Driver Analysis and Results

Provide an explanation for current and future approaches for establishing asset performance and failure rates due to aging equipment, improper performance history, or any other malfunctioning, and their associations to outages/, ignition risk/i, and ignitions.

4.5 Qualitative Analysis and Results

Provide an explanation for each qualitative ignition risk adjustment and the pre- versus post-application of that adjustment.

Table OPUC 4-1: Oregon Service Territory Electrical Infrastructure

Risk Adjustment	Applicable situations	Initial Scoring	Adjustment Factor	Final Scoring
ex: Irrigated Land				
ex: Lack Of Vegetation				

4.6 Circuit Segment Risk Results

Provide a table of the riskiest circuits.

Table OPUC 4-2: Riskiest Circuit Segment Scores

Circuit Segment ID	Geographical Designated Area (ID and Name)	HFRZ Score	Outage Risk Driver Score	Asset Risk Driver Score	Qualitative Risk Score	Combined Risk Score

Circuit Segment ID	Geographical Designated Area (ID and Name)	HFRZ Score	Outage Risk Driver Score	Asset Risk Driver Score	Qualitative Risk Score	Combined Risk Score

4.7 Initiatives and Targets

In this section, the electrical utility will provide qualitative and quantitative targets for each year of the three-year WMP cycle.

4.74.1 Initiative Summary Table

Table OPUC 4-3: Risk Methodology Initiative Cost Summary in Thousands

Initiative Activity	Tracking ID	Target Unit	Year 1 Target ($1,000)	Year 1 Forecast ($1,000)	Year 2 Target ($1,000)	Year 2 Forecast ($1,000)	Year 3 Target ($1,000)	Year 3 Forecast ($1,000)	Three-Year Forecasted Total ($1,000)	Section

~~Initiative Activity~~	~~Tracking ID~~	~~Target Unit~~	~~Year 1 Target~~	~~Year 1 Forecast~~	~~Year 2 Target~~	~~Year 2 Forecast~~	~~Year 3 Target~~	~~Year 3 Forecast~~	~~Three-Year Total~~	~~Section Numbe~~

Note:~~s~~

1. Forecasts and Three-Year Totals provided in $/thousands.
2. All initiative Forecasts and Three-Year Totals include capital cost and operations and maintenance expenses.

4.58 Continuous Improvement

A key element of the WMP is to communicate continuous improvement. In this section, the electrical utility will provide a high-level overview of its plan to improve programmatic and technical aspects of its risk methodology and assessment program investments and activities.

5 Wildfire Mitigation Strategy Development

5.1 Overview

In this section, the electrical utility will provide a high-level overview of the evaluation processes that inform its selection of a portfolio of activities, as well as its overall wildfire mitigation strategy and WMP development.

5.2 Framework

In this section, the electrical utility will provide a brief narrative of its evaluation approach, based on the risk analysis outcomes shared in Section 4. This narrative helps inform the development of a wildfire mitigation strategy that meets the goals and plan objectives shared in Sections 2.

The electrical utility will discuss wildfire mitigation strategy development efforts for each of the following applicable activities:

- Wildfire Mitigation Strategy Development,
- Wildfire Mitigation Strategy Development – Performance monitoring, and
- Wildfire Mitigation Strategy Development – Other.

5.3 Results

In this section of the WMP, the electrical utility will share high-level results from the risk evaluation approach from the prior year.

5.4 Initiatives and Targets

In this section, the electrical utility will provide qualitative and quantitative targets for each year of the three-year WMP cycle.

5.4.1 Initiative Summary Table

Table OPUC 5-1: Wildfire Mitigation Strategy Development Initiative Cost Summary in Thousands

Initiative Activity	Tracking ID	Target Unit	Year 1 Target ($1,000)	Year 1 Forecast ($1,000)	Year 2 Target ($1,000)	Year 2 Forecast ($1,000)	Year 3 Target ($1,000)	Year 3 Forecast ($1,000)	Three-Year Forecasted Total ($1,000)	Section

~~Initiative Activity~~	~~Tracking ID~~	~~Target Unit~~	~~Year 1 Target~~	~~Year 1 Forecast~~	~~Year 2 Target~~	~~Year 2 Forecast~~	~~Year 3 Target~~	~~Year 3 Forecast~~	~~Three-Year Total~~	~~Section Number~~

Note:~~s~~

1. Forecasts and Three-Year Totals provided in $/thousands.
2. All initiative Forecasts and Three-Year Totals include capital cost and operations and maintenance expenses.

5.5 Continuous Improvement

A key element of the WMP is to communicate continuous improvement. In this section, the electrical utility will provide a high-level overview of its plan to improve programmatic and technical aspects of its wildfire mitigation strategy development, project management, data template workbook requirements, and plan document development investments and activities.

5.6 Pilot technology summary

Provide details of any pilot program. Repeat the below table for each pilot program.

Table OPUC 5-2a: "Pilot Name" Pilot Technology Summary

Pilot / Initiative Name		**Tracking ID**	
Details			
Goals			
Status			
Current penetration / saturation			
Application			
Milestones			
Forecast Capital ($1,000)			
Forecast O&M ($1,000)			
Actual Capital (as of date) ($1,000)			
Actual O&M (as of date) ($1,000)			
Implementation Timeframe			
Pilot lifespan			

Note: All forecasts provided in $/thousands.

6 Grid Design and System Hardening

6.1 Overview

Each electrical utility's WMP will include plans for grid design and system hardening programmatic areas. In this section, the electrical utility will discuss how it is designing its system to reduce overall utility risk.

6.2 Mitigations

The electrical utility will discuss grid design and system hardening mitigation work for each of the following applicable activities:

- Covered conductor installation (Tree Wire),
- Distribution pole replacements and reinforcements-,
- Emerging grid hardening technology installations and pilots,
- Installation of system automation equipment,
- Installation of system monitoring equipment (such as CFCI),
- Microgrids,
- Other grid topology improvements to minimize risk of ignitions,
- Other grid topology improvements to mitigate or reduce PSPS events,
- 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, and
- Other technologies and systems not listed above.

6.3 Results

In this section of the WMP, the electrical utility will share high-level results from the grid design and system hardening investments from the prior year.

6.4 Initiatives and Targets

In this section, the electrical utility will provide qualitative and quantitative targets for each year of the three-year WMP cycle.

6.4.1 Initiative Summary Table

Table OPUC 6-1: Grid Design and System Hardening Initiative Cost Summary in Thousands

Initiative Activity	Tracking ID	Target Unit	Year 1 Target ($1,000)	Year 1 Forecast ($1,000)	Year 2 Target ($1,000)	Year 2 Forecast ($1,000)	Year 3 Target ($1,000)	Year 3 Forecast ($1,000)	Three-Year Forecasted Total ($1,000)	Section

~~Initiative Activity~~	~~Tracking ID~~	~~Target Unit~~	~~Year 1 Target~~	~~Year 1 Forecast~~	~~Year 2 Target~~	~~Year 2 Forecast~~	~~Year 3 Target~~	~~Year 3 Forecast~~	~~Three-Year Total~~	~~Section Number~~

Note:~~s~~

1. Forecasts and Three-Year Totals provided in $/thousands.
2. All initiative Forecasts and Three-Year Totals include capital cost and operations and maintenance expenses.

6.5 Continuous Improvement

A key element of the WMP is to communicate continuous improvement. In this section, the electrical utility will provide a high-level overview of its plan to improve programmatic and technical aspects of its grid design and system hardening investments and activities.

7 Inspect/Correct

7.1 Overview

Each electrical utility's WMP will include an overview of its procedures for inspecting its assets and making corrections.

Table OPUC 7-1~~X~~: Asset Inspection Programs~~"title"~~

OAR Inspection	OPUC Inspection type	OPUC Frequency	Utility Pprogram Nname	Utility pProgram Details	Utility Frequency
OAR 860-024-0011(2)(c)	Safety Patrol ~~inspections~~Inspections	Every 2 years			
OAR 860-024- 0011(1)(A)(B)	Details Inspections	10 years			
OAR 860-240-0001, OAR 860-024-0018(3)(a)	Ignition Prevention (HFRZ Safety Patrol)	Annual HFRZ			

OAR Inspection	OPUC Inspection type	OPUC Frequency	Utility Pprogram Nname	Utility pProgram Details	Utility Frequency
OAR 860-024-0010	Other ~~inspection~~Inspection				
NA	Other				

Table OPUC ~~X~~7-2: ~~"title"~~ Asset Correction Types

OAR Correction	OPUC Finding	OPUC Corrective Ttime frame	Utility Correction ~~Program~~ Type Name	Utility ~~program~~ Type Details	Utility Corrective Timeframe
OAR 860-024-0012(1)	Priority I, or other utility specific correction timelines	30 days			
OAR 860-024-0012(1)	Priority A	90 days			
OAR 860-024-0012(2)	Priority B	2 years			
OAR 860-024- 0012(3)(a)	Priority C	10 years			
OAR 860-024- 0018(5)(a)(b)	Ignition Prevention Finding	180 days			
NA	Other				

7.2 Mitigations

The electrical utility will discuss inspection and correction mitigation work for each of the following applicable activities:

- 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, and
- Inspect/Correct – Other.

7.3 Results

In this section of the WMP, the electrical utility will share high-level results from the inspection and correction investments and activities from the prior year.

Table OPUC 7-3: HFRZ Asset Correction Summary

OPUC Correction	OPUC Corrective Timeframe	Utility Correction Type Name	Total Findings	Corrected On Time	Corrections Past Due	Average Days to Correct
Priority I, or other utility specific correction timelines	30 days	"Reference name in table 7-2"				
Priority A	90 days					
Priority B	2 years					
Priority C	10 years					
Ignition Prevention Finding	180 days					
Other						

7.4 Initiatives and Targets

In this section, the electrical utility will provide qualitative and quantitative targets for each year of the three-year WMP cycle.

7.4.1 Initiative Summary Table

Table OPUC 7-4: Inspect/Correct Initiative Cost Summary in Thousands

Initiative Activity	Tracking ID	Target Unit	Year 1 Target ($1,000)	Year 1 Forecast ($1,000)	Year 2 Target ($1,000)	Year 2 Forecast ($1,000)	Year 3 Target ($1,000)	Year 3 Forecast ($1,000)	Three-Year Forecasted Total ($1,000)	Section

Initiative Activity	Tracking ID	Target Unit	Year 1 Target ($1,000)	Year 1 Forecast ($1,000)	Year 2 Target ($1,000)	Year 2 Forecast ($1,000)	Year 3 Target ($1,000)	Year 3 Forecast ($1,000)	Three-Year Forecasted Total ($1,000)	Section

~~Initiative Activity~~	~~Tracking ID~~	~~Target Unit~~	~~Year 1 Target~~	~~Year 1 Forecast~~	~~Year 2 Target~~	~~Year 2 Forecast~~	~~Year 3 Target~~	~~Year 3 Forecast~~	~~Three-Year Total~~	~~Section Number~~

Note:~~s~~

1. Forecasts and Three-Year Totals provided in $/thousands.
2. All initiative Forecasts and Three-Year Totals include capital cost and operations and maintenance expenses.

7.5 Continuous Improvement

A key element of the WMP is to communicate continuous improvement. In this section, the electrical utility will provide a high-level overview of its plan to improve programmatic and technical aspects of its inspection and correction investments and activities.

8 Vegetation Management

8.1 Overview

Each electrical utility's WMP will include plans for vegetation management. This includes the applicable requirements included in OAR 860-300-0020, Wildfire Protection Plan Filing Requirements.

Table OPUC 8-1~~X~~: Vegetation Inspection Type

OPUC Inspection Type	Area	Utility Program Name	Utility program Details	Utility Corrective Timeframe
Routine Non-Wildfire	Ex: Outside HFRZ			
Routine Wildfire	Ex: Inside HRFZ			
Non-Routine				

8.2 Mitigations

In this section, the electrical utility will provide an overview of its vegetation management inspection activities and mitigation work for overhead electrical assets, including the following as applicable:

- Clearance,
- Emergency response vegetation management,
- Fall-in mitigation,
- Fire-resilient rights-of-way,
- 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, and
- Vegetation Management – Other.

8.3 Results

In this section of the WMP, the electrical utility will share high-level results from the vegetation management investments and activities from the prior year. Outline inspection and completion cycle results.

8.4 Initiatives and Targets

In this section, the electrical utility will provide qualitative and quantitative targets for vegetation management and inspections for each year of the three-year WMP cycle.

8.4.1 Initiative Summary Table

Table OPUC 8-2: Vegetation Management Initiative Cost Summary in Thousands

Initiative Activity	Tracking ID	Target Unit	Year 1 Target ($1,000)	Year 1 Forecast ($1,000)	Year 2 Target ($1,000)	Year 2 Forecast ($1,000)	Year 3 Target ($1,000)	Year 3 Forecast ($1,000)	Three-Year Forecasted Total ($1,000)	Section

~~Initiative Activity~~	~~Tracking ID~~	~~Target Unit~~	~~Year 1 Target~~	~~Year 1 Forecast~~	~~Year 2 Target~~	~~Year 2 Forecast~~	~~Year 3 Target~~	~~Year 3 Forecast~~	~~Three-Year Total~~	~~Section Number~~

Note:s

1. Forecasts and Three-Year Totals provided in $/thousands.
2. All initiative Forecasts and Three-Year Totals include capital cost and operations and maintenance expenses.

8.5 Continuous Improvement

A key element of the WMP is to communicate continuous improvement. In this section, the electrical utility will provide a high-level overview of its plan to improve programmatic and technical aspects of its vegetation management investments and activities.

9 Situational Awareness and Forecasting

9.1 Overview

Each electrical utility's WMP will include plans for situational awareness.

9.2 Mitigations

The electrical utility will discuss situational awareness and forecasting mitigation work for each of the following applicable activities:

- Environmental monitoring systems,
- Fire potential index,
- Grid monitoring systems,
- Ignition detection systems-,
- Near-term Risk Modeling,
- Weather forecasting-,
- Situational Awareness and Forecasting – -Performance monitoring, and
- Situational Awareness and Forecasting – -Other.

9.3 Results

In this section of the WMP, the electrical utility will share high-level results from the situational awareness and forecasting investments and activities from the prior year.

9.4 Initiatives and Targets

In this section, the electrical utility will provide qualitative and quantitative targets for each year of the three-year WMP cycle.

9.4.1 Initiative Summary Table

Table OPUC 9-1: Situational Awareness and Forecasting Initiative Cost Summary in Thousands

Initiative Activity	Tracking ID	Target Unit	Year 1 Target ($1,000)	Year 1 Forecast ($1,000)	Year 2 Target ($1,000)	Year 2 Forecast ($1,000)	Year 3 Target ($1,000)	Year 3 Forecast ($1,000)	Three-Year Forecasted Total ($1,000)	Section

~~Initiative Activity~~	~~Tracking ID~~	~~Target Unit~~	~~Year 1 Target~~	~~Year 1 Forecast~~	~~Year 2 Target~~	~~Year 2 Forecast~~	~~Year 3 Target~~	~~Year 3 Forecast~~	~~Three-Year Total~~	~~Section Number~~

Note~~s~~:

1. Forecasts and Three-Year Totals provided in $/thousands.
2. All initiative Forecasts and Three-Year Totals include capital cost and operations and maintenance expenses.

9.5 Continuous Improvement

A key element of the WMP is to communicate continuous improvement. In this section, the electrical utility will provide a high-level overview of its plan to improve programmatic and technical aspects of its situational awareness and forecasting program.

10 Grid Operations and Protocols

10.1 Overview

In this section, the electrical utility will discuss the ways in which it implements work procedures and operates its system to reduce wildfire risk.

10.2 Mitigations

The electrical utility will discuss grid operations and protocols mitigation work for each of the following applicable activities:

- Equipment Settings to Reduce Wildfire Risk (Grid Ops),
- Grid Response Procedures and Notifications (Grid Ops),
- 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, and
- Other technologies and systems not listed above.

10.3 Results

In this section of the WMP, the electrical utility will share high-level results from ~~the grid~~grid operations and protocols investments and activities from the prior year.

10.4 Initiatives and Targets

In this section, the electrical utility will provide qualitative and quantitative targets for each year of the three-year WMP cycle.

10.4.1 Initiative Summary Table

Table OPUC 10-1: Grid Operations and Protocols Initiative Cost Summary in Thousands

Initiative Activity	Tracking ID	Target Unit	Year 1 Target ($1,000)	Year 1 Forecast ($1,000)	Year 2 Target ($1,000)	Year 2 Forecast ($1,000)	Year 3 Target ($1,000)	Year 3 Forecast ($1,000)	Three-Year Forecasted Total ($1,000)	Section

~~Initiative Activity~~	~~Tracking ID~~	~~Target Unit~~	~~Year 1 Target~~	~~Year 1 Forecast~~	~~Year 2 Target~~	~~Year 2 Forecast~~	~~Year 3 Target~~	~~Year 3 Forecast~~	~~Three-Year Total~~	~~Section Number~~

Note~~s~~:

1. Forecasts and Three-Year Totals provided in $/thousands.
2. All initiative Forecasts and Three-Year Totals include capital cost and operations and maintenance expenses.

10.5 Continuous Improvement

A key element of the WMP is to communicate continuous improvement. In this section, the electrical utility will provide a high-level overview of its plan to improve programmatic and technical aspects of its grid operations and protocols program.

11 Emergency Preparedness

11.1 Overview

Each electrical utility will share information on emergency preparedness and engagement with public safety partners and stakeholders.

11.2 Strategy and Response

The electrical utility will discuss emergency preparedness efforts associated with each of the following applicable activities:

- Customer support in wildfire emergencies,
- Protocol for emergency preparedness plan,
- Public Safety Partner collaboration and coordination,
- Preparedness and planning for service restoration,
- Public emergency communication strategy, and
- Public safety portal.

11.3 Results

In this section of the WMP, the electrical utility will share high-level results from the emergency preparedness investments and activities from the prior year.

11.4 Initiatives and Targets

In this section, the electrical utility will provide qualitative and quantitative targets for each year of the three-year WMP cycle.

11.4.1 Initiative Summary Table

Table OPUC 11-1: Emergency Preparedness Initiative Cost Summary in Thousands

Initiative Activity	Tracking ID	Target Unit	Year 1 Target ($1,000)	Year 1 Forecast ($1,000)	Year 2 Target ($1,000)	Year 2 Forecast ($1,000)	Year 3 Target ($1,000)	Year 3 Forecast ($1,000)	Three-Year Forecasted Total ($1,000)	Section

~~Initiative Activity~~	~~Tracking ID~~	~~Target Unit~~	~~Year 1 Target~~	~~Year 1 Forecast~~	~~Year 2 Target~~	~~Year 2 Forecast~~	~~Year 3 Target~~	~~Year 3 Forecast~~	~~Three-Year Total~~	~~Section Number~~

Note:~~s~~

1. Forecasts and Three-Year Totals provided in $/thousands.
2. All initiative Forecasts and Three-Year Totals include capital cost and operations and maintenance expenses.

11.5 Continuous Improvement

A key element of the WMP is to communicate continuous improvement. In this section, the electrical utility will provide a high-level overview of its plan to improve programmatic and technical aspects of its emergency preparedness program.

12 Public Safety Power Shutoff

12.1 Overview

Each electrical utility will share information on public safety power shutoff protocols, customer support during PSPS events, and engagement with public safety partners and stakeholders.

12.2 Strategy and Response

The electrical utility will discuss public safety power shutoff efforts associated with each of the following applicable activities:

- Customer support in PSPS,
- Protocol for de-energization preparedness plan,
- Public Safety Partner collaboration and coordination,
- Preparedness and planning for service restoration,
- PSPS communication strategy,
- Battery Programs,
- Community Resource Centers,
- PSPS & Emergency Preparedness – Performance monitoring, and
- PSPS & Emergency Preparedness – Other.

The electrical utility may reference other sections of the mitigation plan as appropriate if response is already described in other sections.

12.3 Results

In this section of the WMP, the electrical utility will share high-level results from public safety power shutoff investments and activities from the prior year, including links to filed PSPS Annual Reports on de-energization lessons learned from the three prior calendar years. (provide a link to any PSPS event filings).

12.4 Initiatives and Targets

In this section, the electrical utility will provide qualitative and quantitative targets for each year of the three-year WMP cycle.

12.4.1 Initiative Summary Table

Table OPUC 12-1: Public Safety Power Shutoff Initiative Cost Summary in Thousands

Initiative Activity	Tracking ID	Target Unit	Year 1 Target ($1,000)	Year 1 Forecast ($1,000)	Year 2 Target ($1,000)	Year 2 Forecast ($1,000)	Year 3 Target ($1,000)	Year 3 Forecast ($1,000)	Three-Year Forecasted Total ($1,000)	Section

~~Initiative Activity~~	~~Tracking ID~~	~~Target Unit~~	~~Year 1 Target~~	~~Year 1 Forecast~~	~~Year 2 Target~~	~~Year 2 Forecast~~	~~Year 3 Target~~	~~Year 3 Forecast~~	~~Three-Year Total~~	~~Section Number~~

Note~~:s~~

1. Forecasts and Three-Year Totals provided in $/thousands.
2. All initiative Forecasts and Three-Year Totals include capital cost and operations and maintenance expenses.

12.5 Continuous Improvement

A key element of the WMP is to communicate continuous improvement. In this section, the electrical utility will provide a high-level overview of its plan to improve programmatic and technical aspects of its public safety power shutoff program.

13 Community Outreach and Public Awareness

13.1 Overview

The electrical utility will describe at a high level its comprehensive wildfire engagement plan strategy to describe the utility's efforts to engage and collaborate with local communities. ~~(~~Include reference to any appendices which provide any communication content or surveys~~)~~.

13.2 Strategy

The electrical utility will discuss community outreach and public awareness strategies associated with each of the following applicable activities:

- Best Practice sharing with other utilities;
- Collaboration on local wildfire mitigation planning;
- Engagement with access and functional needs populations or environmental justice communities;
- WMP engagement, outreach, and education awareness program;
- Community Outreach and Engagement – -Performance monitoring; and
- Community Outreach and Engagement – -Other.

13.3 Results

In this section of the WMP, the electrical utility will share high-level results from community outreach and public awareness investments and activities from the prior year. (Ssurvey details in Appendix E).

13.4 Initiatives and Targets

In this section, the electrical utility will provide qualitative and quantitative targets for each year of the three-year WMP cycle.

13.4.1 Initiative Summary Table

Table OPUC 13-1: Community Outreach and Public Awareness Initiative Cost Summary in Thousands

Initiative Activity	Tracking ID	Target Unit	Year 1 Target ($1,000)	Year 1 Forecast ($1,000)	Year 2 Target ($1,000)	Year 2 Forecast ($1,000)	Year 3 Target ($1,000)	Year 3 Forecast ($1,000)	Three-Year Forecasted Total ($1,000)	Section

~~Initiative Activity~~	~~Tracking ID~~	~~Target Unit~~	~~Year 1 Target~~	~~Year 1 Forecast~~	~~Year 2 Target~~	~~Year 2 Forecast~~	~~Year 3 Target~~	~~Year 3 Forecast~~	~~Three-Year Total~~	~~Section Number~~

Note:s

1. Forecasts and Three-Year Totals provided in $/thousands.
2. All initiative Forecasts and Three-Year Totals include capital cost and operations and maintenance expenses.

13.5 Continuous Improvement

A key element of the WMP is to communicate continuous improvement. In this section, the electrical utility will provide a high-level overview of its plan to improve programmatic and technical aspects of its community outreach and public awareness program.

14 Industry Engagement

14.1 Overview

The electrical utility will provide a description of participation in national and international forums, including workshops, as well as research and analysis the Public Utility has undertaken to maintain expertise in leading edge technologies and operational practices.

14.2 Strategy

The electrical utility will discuss industry engagement strategies associated with each of the following applicable activities:

- Participation in forums/ sharing industry best practices or learnings, and
- Research and analysis to maintain expertise on emerging technologies/ practices.

14.3 Results

In this section of the WMP, the electrical utility will share high-level results from industry engagement activities from the prior year.

Table OPUC 14-1: Industry Engagements

Date	Meeting	Agency / Organization	Topic	Key Takeaways	Program/Project/Pilot Informed by Meeting

14.4 Initiatives and Targets

In this section, the electrical utility will provide qualitative and quantitative targets for each year of the three-year WMP cycle.

14.4.1 Initiative Summary Table

Table OPUC 14-2: Industry Engagement Initiative Cost Summary in Thousands

Initiative Activity	Tracking ID	Target Unit	Year 1 Target ($1,000)	Year 1 Forecast ($1,000)	Year 2 Target ($1,000)	Year 2 Forecast ($1,000)	Year 3 Target ($1,000)	Year 3 Forecast ($1,000)	Three-Year Forecasted Total ($1,000)	Section

~~Initiative Activity~~	~~Tracking ID~~	~~Target Unit~~	~~Year 1 Target~~	~~Year 1 Forecast~~	~~Year 2 Target~~	~~Year 2 Forecast~~	~~Year 3 Target~~	~~Year 3 Forecast~~	~~Three-Year Total~~	~~Section Number~~

Note:s

1. Forecasts and Three-Year Totals provided in $/thousands.
2. All initiative Forecasts and Three-Year Totals include capital cost and operations and maintenance expenses.

14.5 Continuous Improvement

A key element of the WMP is to communicate continuous improvement. In this section, the electrical utility will provide a high-level overview of its plan to improve programmatic and technical aspects of its industry engagement program.

Appendix A Definitions of Terms

Unless otherwise expressly stated, the following words and terms, for the purposes of these Guidelines, have the meanings shown in this appendix.

Term	Acronym	Definition

~~Term~~	~~**Acronym**~~	~~Definition~~

Appendix B WMP Regulatory Compliance Checklist

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. At a minimum, the regulatory requirements checklist will include information shown in the example that follows.

~~Rule Citation~~ (OAR)/Order Citation	OAR Description	WMP Section(s)
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.	
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.	
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.	
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.	
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, including a PSPS communication strategy consistent with OAR 860-300-040 through 860-300-0050.	
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, consistent with OAR 860-300-040 through OAR 860-300-050.	
OAR 860-300-0020 (1)(g)	Description of the procedures, standards, and timeframes the Public Utility will use to inspect utility infrastructure in areas it has identified as heightened risk of wildfire, consistent with OAR 860-024-0018.	
OAR 860-300-0020 (1)(h)	Description of the procedures, standards, and timeframes that the utility will use to carry out vegetation management in areas it has identified as heightened risk of wildfire, consistent with OAR 860-024-0018.	
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 as well as considerations of technologies that offer co-benefits to the utility's system.	
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, including how such	

~~Rule Citation~~ (OAR)/Order Citation	OAR Description	WMP Section(s)
	technologies and operational practices have been used to develop and implement cost-effective wildfire mitigation solutions.	
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.	
IWRMC Maturity Model Results		
"OPUC Commission Orders from the previous year"		

Appendix C Areas of Additional Improvement

In this appendix, the electrical utility will provide responses to applicable its areas of additional improvement as identified in the OPUC Commission Orders from the previous multi-year WMP and WMP Update in the following format:

Areas for Additional Improvement/Recommendation Citation: This should include a citation to the Area of Additional Improvement including the order number as well as the recommendation number. For example, Idaho Power's citation to Staff's second recommendation adopted in Order No. 24-231 might look like "24-231_2".

Recommendations: This is the work or information 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 No. 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)."

Utility 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. If there is an initiative in the plan that addresses this recommendation, reference the section where it is discussed.

Appendix D Detailed HFRZ Maps

In this appendix, the electrical utility will provide detailed maps of the HFRZ Geographical Designated Areas overlayed with assets.

Appendix E Current and Planned Mitigation Investments

In this appendix, the electrical utility will provide in the 2026 WMP a table of all current and planned mitigation work investments.

Circuit ID/ ZOP ID	Risk Score Prior to Mitigation	Risk Score Post to Mitigation	RSE Score	Historic Ignition Driving Risk[1]	Capital Investment Costs ($1,000)	Operation and Maintenance Costs ($1,000)	Target date for Engineering Completion	Target date for Construction	Target date for Completion	Mitigation Type and Units	Comments

[1] Provide the risk drivers creating the most risk for the Circuit ID/ZOP ID, such as historical outage types, weather or landscape changes.

Circuit ID/ ZOP ID	Risk Score Prior to Mitigation	Risk Score Post to Mitigation	RSE Score	Historic Ignition Driving Risk[1]	Capital Investment Costs ($1,000)	Operation and Maintenance Costs ($1,000)	Target date for Engineering Completion	Target date for Construction	Target date for Completion	Mitigation Type and Units	Comments

Appendix ~~E~~F Community Outreach and Public Awareness Surveys

Where applicable, in this appendix the electrical utility will 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 the options available for responses

Appendix GF Maturity Model Assessment

In this appendix, the electrical utility will provide its self-assessment using the construct of the IWRMC Maturity Model, including Key Capability, approach, and timeline.