

ORDER NO. 25-429

ENTERED Oct. 29, 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

At its public meeting on October 28, 2025, the Public Utility Commission of Oregon adopted Staff's recommendation in this matter. The Staff Report with the recommendation is attached as Appendix A.



BY THE COMMISSION:

Alison Lackey
Chief Administrative Law Judge

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

REGULAR _____ CONSENT X EFFECTIVE DATE _____ N/A

SUBJECT: OREGON PUBLIC UTILITY COMMISSION STAFF:
(Docket No. UM 2340)
WMP 2025 Data Template and Guidelines Update

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In Order No. 24-326 the Commission adopted the Wildfire Mitigation Plan Data Template and Data Template Guidelines, which required the utilities to file an Initial Data Template, containing data for quarters 1-3, by January 1, 2025, and a final report, including fourth quarter data, by March 31, 2025.¹

Analysis

Background

In Order No. 24-326² Commissioners requested that

the Utilities should strive to make meaningful advances in the quality, clarity, and completeness of their data collection and reporting, while also identifying with specificity and concreteness areas where the costs and challenges associated with Staff's template expectations are out of proportion to their ability to advance the PUC's goal of maturing analysis of cost-effective wildfire risk mitigation.

As requested, in the 2025 WMP Updates the utilities provided suggestions, data limitations, and inquiries regarding various data inputs within the Data Template.

Staff reviewed in conjunction with utility comments, the 2025 Data Template filings and determined added clarity and the combining of requested details would help to streamline submissions, resulting in the IOUs being able to provide the data in a more consistent manner. Additionally, Staff felt it pertinent that the Data Templates align with the WMP Glossary of Shared Terminology adopted in Order No. 25-326.³

This memo details the findings and process which led to the proposed updates.

Process

Staff and stakeholders collaborated on the Data Template updates in an iterative process. On September 26, 2025, Staff posted the draft modifications with a request for comments by October 10, 2025. Where possible, Staff incorporated the changes requested in comments into its proposal.

¹ [Order No. 24-326.](#)

² [Order No. 24-326.](#)

³ [Order No. 25-326.](#)

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Staff Analysis and Updates

Staff appreciates the thoroughness and organization of comments provided by each utility as part of its 2025 WMP Update. These comments requested clarification of data template ranging from the defining of specific terms, such as critical facilities, to default values used when specific data is not currently available by the company, to how to calculate specific units.

In conjunction with the feedback and concerns noted in the WMP filing, staff also thoroughly reviewed the data templates filed by each utility. Staff found that in some cases the interpretation and completion of similar data fields varied across submissions. In recognition the varying interpretations around some of the data provided by the utilities, Staff felt it was important to provide default entries for elements a utility has yet to capture in their data.

Staff's proposed WMP Data Template Guideline Updates can be found in Attachment A with a redline version of the changes to the current Data Template Guidelines included in Attachment B. Similarly, Staff's proposed 2025 Data Template Workbook is provided in Attachment C,⁴ with a redline version highlighting changes from the current WMP Data Template provided in Attachment D. The notable updates to these documents are summarized below.

Data Template Guidelines: This document provides an overview of procedural aspects for the data templates as well as a detailed explanation for filling out each table. Updates to the guidelines include updated details for each of the tables to align with changes to the workbook, edits with added information outlining regulations, definitions, and calculations for specific unit measurements. Deletion of Appendix A: Definitions, as redundant since approval of WMP Glossary of Shared Terminology on August 20, 2025.

Based on utility comments, Staff also added section 3.3 Risk Target Reduction, to define the various risk reductions associated with mitigation initiative categories and activities.

Data Workbook Cover Sheet: Staff had previously worked to develop a process that would allow each IOU to configure the data template to their specific HFRZ naming convention, however feedback from the IOUs noted that this caused confusion in the data template as it created strikethroughs throughout the report where data was not applicable to the specific utility. As a result, Staff reduced the inputs to simply Non-

⁴ The contents of the WMP Data Template Workbook provided is a PDF print out of the excel workbook. Staff provided copies of the WMP Data Template Workbook in excel form to the service lists for UM 2207, UM 2208, and UM 2209.

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HFRZ, HFRZ, and Areas of Interest. Staff also aligned definitions to the WMP Glossary of Shared Terminology and provided additional clarity around the naming conventions when submitting the Data Template.

PacifiCorp requested clarification of whether “Fire Season Start Date” and “Fire Season End” date used in the cover sheet and the fire season dates used in the proposed RSE Workbook Filing should be the same. Staff clarifies that the Data Workbook uses these terms as defined in the WMP Glossary of Shared Terminology, and that the “Fire Season Start Date” and “Fire Season End Date” should be consistent across WMP submissions for each utility. To the extent that the utility has differing fire season start, and end dates based on the utility’s geographic designated areas those dates shall be carried throughout the reporting based on the data within the utility’s geographic designated areas.

Table 1 - System Overview: This sheet is used to provide a summary or snapshot of the system assets for the reporting period. Staff updated some metric types to clarify the type of information requested, such as transmission and distribution (T&D) and overhead (OH). Staff also added a request for utilities to provide existing asset units for spacer cable and tree wire. Staff identified default values to use when specific equipment types are not tracked and clarified the unit of measurements to circuit miles (versus line miles) to align with definitions in the Shared Terminology document.

Table 2 - Initiative Data: This sheet requires the utilities to provide a summarized list of their specific programs and activities and asks the utilities to interpret and link their specific initiatives to an OPUC initiative classification and activity (defined in section 3.2 of the WMP Data Template Workbook). Staff corrected an abbreviation error and noted dollar values should be provided in thousands of dollars.

PacifiCorp comments sought clarity of terms in Columns N & O. Staff clarifies that the requested definitions and clarifications have been incorporated into the WMP Data Template Guidelines.

Table 3 - Inspections: This sheet includes reporting on the utility’s overall transmission and distribution asset inspection and vegetation program(s), consistent with the Commission’s safety rules. Staff streamlined this table to eliminate tracking of totals for inspections and moved utility inspection findings to Tables 4 and 5. Staff also aligned relevant terminology to the WMP Glossary of Shared Terminology, added ground inspections as an inspection type, and enhanced data inputs. For clarity, Staff provided more specifics on inspection types in the Data Template Guidelines.

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In response to Idaho Power's comments for the entry of 'not inspected' data Staff chose to remove these attributes from the table.

Table 4 - Asset Nonconformance-Correction: This sheet outlines asset inspection results from data previously requested in Table 3. In conjunction with the changes that were made to Table 3, inspection results were added to Table 4. Enhancements were made combining the tracking for found nonconformance and corrections into a single metric type. This provides utilities the opportunity to demonstrate the cycle for found nonconformances with safety rules and corrections based on the priority finding type.

In response to comments received from the utilities, Staff updated the terminology in Tables 4 and 5.

Table 5 - Vegetation Finding-Correction: This sheet includes vegetation management inspections, findings, and results which took place in the relevant period. Updates made to this table align with the changes made in Tables 3 and 4, connecting inspection findings to the corrective actions.

PacifiCorp requested clarity around past due violations and noted that the utility currently does not capture the detail requested. Staff has currently removed requests for details on the previous year's outstanding vegetation findings and corrections to align with vegetation safety requirements. If needed, Staff will address any follow-up questions after utility submissions of the 2026 Multi-Year Wildfire Mitigation Plans.

Table 6 - Performance Metrics: This sheet allows utilities to report any additional metrics tracked and used to evaluate wildfire mitigation performance. No updates were made to this table.

Table 7 - Risk Performance: This sheet summarizes risk based on weather patterns significant to fire risk potential. Staff added additional clarity for a few metric types based on IOU feedback and the Glossary of Shared Terminology. In addition, Staff added unit requests for fire season and non-fire season based on IOU feedback during the development of the Risk Spend Efficiency (RSE) process.

Table 8 - Risk Events: This sheet provides an overview of situations which are considered risk event drivers but has no association with ignitions. Staff added unit requests for fire season and non-fire season, while also outlining default values in the Data Template Guidelines, for use when specific equipment risk event drivers are not tracked.

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Table 9 - *Ignition Events*: This sheet summarizes ignition events based on risk event drivers. Staff added unit requests for fire season and non-fire season and outlined default values in the Data Template Guidelines, for use when specific equipment risk event drivers are not tracked.

Table 10 - *Equipment Area Index*: This sheet outlines utility equipment and customer counts across the utilities' service territory. Staff updated some metric types to clarify the type of information requested and requested units for spacer cable and tree wire, while also updating details in the Data Template Guidelines for how to calculate point data for urban, suburban, and rural.

Table 11 - *Equipment Area Index Changes*: This sheet summarizes additions, removals or upgrades to utility equipment. Staff updated some metric types to clarify the type of information requested and requested units for spacer cable and tree wire, while also updating details in the Data Template Guidelines for how to calculate point data for urban, suburban, and rural.

Idaho Power expressed concern with the changes in Table 11 noting that it would require additional enterprise level modifications to address these updates. Staff notes that these changes were also reflected in table 10 and as such Staff considers Idaho Power's concerns to relate to Table 10 also. Staff's updates to these tables were largely the result of feedback provided in PacifiCorp's 2025 WMP filing which requested additional clarity on secondary line inclusion in calculations and how best to associate single locational data to urban, rural, and suburban classifications. Staff will work with Idaho Power to evaluate options for proxy calculations, as needed.

Table 12 - *De-energization and PSPS Metrics*: This sheet outlines specified de-energization and PSPS-related metrics for the reporting year. Staff added additional clarity to some metric types.

Table 13 - *Mitigation Initiative Targets*: This sheet summarizes actual and projected costs and units for initiative activities. Staff added additional clarity to some metric types and noted dollar values should be provided in thousands of dollars.

Stakeholder Comments

Staff received comments from PacifiCorp, Idaho Power, Portland General Electric, AiDash and a single public comment. Comments were generally supportive of the proposed updates to the WMP Data Template Guidelines, though most parties identified specific requests for changes. Staff reviewed and incorporated requested changes where the opportunity existed. These are noted in the section above. Additionally, Staff recommends that utilities review the Data Template Guidelines, specifically the sections

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for each table and the footnoted details within these sections for additional clarity, default fields for data yet to be collected, sources, and links to specific questions which may occur. Based on the public comment, Staff also recommends that when utilities submit filings for the wildfire plans, they continue to utilize the adopted definitions⁵ and align any inspection and correction programs to Oregon Administrative Rules⁶.

Continuing the collaborative effort, Staff intends to conduct individual meetings with each IOU to further clarify any specific information, addressing any potential barriers a utility may have around the completion of the data template. Staff values this conversation and collaboration as it assists in enhancing the development of future WMP products.

Conclusion

Staff's goal with these changes is to continue to attain alignment between the various document requirements established in UM 2340. Staff recognizes and appreciates the requests and feedback provided by the IOUs in the 2025 WMP Update filings and made its best attempt to address and accommodate the requested updates.

Staff acknowledges that utility efforts around reducing wildfire risk have advanced immensely over the last few years and recognizes that much of this work is still evolving. Staff works to mitigate impacts on the utilities while balancing the evolution with current reporting and data requests.

PROPOSED COMMISSION MOTION:

Approve the Wildfire Mitigation Plan (WMP) 2025 Data Template and Data Template Guidelines Update for use by the investor-owned electric utilities.

⁵ [Order No 25-326, August 20, 2025](#).

⁶ [OAR 860-024](#) and [OAR 860-300](#), WMP Inspection and correction OARs can be found in Chapters 7 and 8 of the [Multi-Year Wildfire Mitigation Plan Shared Format](#).

Wildfire Mitigation Plan (WMP) - Data Template Guidelines

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1 Overview

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

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

1.1 Version History

Previous versions of the OPUC Data Template:

- UM 2340 WMP Phase 1 Data_Template_Workbook¹

1.2 Submission Schedule

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

Table 1. WMP Data Template Workbook Worksheet Submission Schedule Details

Worksheet	December 31 Submission of Q1- Q3, (field requirements)	March 31 Submission of Q4, (field requirements)
Cover Sheet	All fields	All fields
Table 1-System Overview	All fields	Only if corrections
Table 2-Initiatives	All fields	All fields
Table 3-Inspections	‘Year’ Q1-3	‘Year’ Q4 & Q1-3 corrections
Table 4- Asset Nonconformances-Correction	‘Year’ Q1-3	‘Year’ Q4 & Q1-3 corrections
Table 5-Veg Nonconformances-Correction	‘Year’ Q1-3	‘Year’ Q4 & Q1-3 corrections
Table 6-Performance Metrics	All fields	Only if corrections

¹ Filed in the September 19, 2024, [Public Meeting Agenda](#) and [Excel Data Template download](#).

Worksheet	December 31 Submission of Q1- Q3, (field requirements)	March 31 Submission of Q4, (field requirements)
Table 7-Risk Performance	'Year' Q1-3	'Year' Q4 & Q1-3 corrections
Table 8-Risk Events	'Year' Q1-3	'Year' Q4 & Q1-3 corrections
Table 9-Ignition Events	'Year' Q1-3	'Year' Q4 & Q1-3 corrections
Table 10-Asset Index	All fields	Only if corrections
Table 11-Asset Index Changes	All fields	Only if corrections
Table 12-De-engz & PSPS Metrics	'Year' Q1-3	'Year' Q4 & Q1-3 corrections
Table 13-Mit Initiative Targets	All fields	All fields

1.2.1 Submission Naming Convention

When submitting the WMP Data Template Workbook, the file name shall include the filing year, Initial or Final, utility abbreviation shown in Table 2, and WMP_Data_Template. For example, "YYYY_Initial_PAC_WMP_Data_Template.xlsx" (for the December submission) and "YYYY_Final_PAC_WMP_Data_Template.xlsx" (for the March submission).

Table 2. Electric Utility Abbreviations

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

1.2.2 Designation of Confidential Information

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

1.3 Filing Errata, Revisions, and Versions

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

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

- Description

- Explanation for each revision
- Table name and cell reference

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

2 WMP Data Template Workbook

2.1 Completing the WMP Data Template Workbook

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

Requirements for Data

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

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

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

2.2 WMP Data Template Workbook Cover Sheet

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

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

- **Utility Name:** Use the drop down to select the appropriate name for the electric utility submitting the data. *This field is incorporated into the subsequent workbooks.*
- **Submission Date:** The date the data was provided.
- **Reporting period year:** is defined as the actual period of time for the relevant data provided. For example, the 2030 WMP filing should include data for the 2029 reporting period year. In this example, all data should be accurate as of December 31, 2029, including any projections of future costs (this may also be called reporting year). *This field is incorporated into the subsequent worksheets.*
- **Submission Type:** is defined based on the time of the filing.
 - For filings meeting the December 31 deadline select “Initial” as the submission type.
 - For filings meeting the March 31 deadline select “Final” as the submission type.
- **Submission File Name:** an auto-completed field which defines the appropriate file name for each workbook submission.
- **Geographic Designation ID:** OPUC auto-created reference ID for the specific geographic area.
- **Geographic Designation Name:** Electric utility geographic designated areas represent geographical subareas which the electric utility identifies as having a level of fire risk above non-HFRZ (including areas of interest). The geographical areas are often contained within a single boundary/polygon or a localized grouping of areas. These areas may highlight specific area mitigation projects based on risk analysis for the given location. Examples of previous Geographical Designated Areas provided in electric utility filed WMPs include Idaho Power Company’s (Austin Junction, OR, or Halfway, OR), PacifiCorp’s (Hood River, Roseburg), Portland General Electric’s (Zone1 or Zone 5). *This field is incorporated into the subsequent worksheet Table 1.*
- **‘YYYY’ Risk Designation:** This attribute is used by the reporting electric utility to identify distinction levels of Wildfire Risk for the Geographic Designated Area for the reporting period year. Inputs for these areas include HFRZ, HFRZ (tier 2), HFRZ (tier 3), and Areas of Interest (non-HFRZ). Note that the OPUC defines an Area of Interest as an identified area which is being observed as elevated risk but has not yet been incorporated into the utility’s HFRZ. *This field is incorporated into the subsequent worksheets.*
- **Fire Season Start Date²:** Electric utility specified reporting period date for the start of fire season for the geographic designated area.

² To the extent that the utility has differing fire season start and end dates they can accommodate that variation by associating the appropriate dates to each geographic areas they have identified in their Plans. These designations and the start and end dates shall be consistent throughout all WMP reporting elements for the reporting year. For instance, if one HFRZ geographic designated area’s fire season was initiated on May 15 and terminated on October 10, yet another HFRZ area began on June 1 and terminated on October 20, such shall be noted. If the operator, however, identifies one system-wide start and end date they can so note that it is associated with all HFRZ areas.

- **Fire Season End Date:** Electric utility specified reporting period date for the end of fire season for the geographically designated area.

2.3 Substantive WMP Data Workbook Tables

2.3.1 Table 1: System Overview

The “System Overview” is used to provide a summary or snapshot of the system assets for the reporting period, distinguished by the Geographic Designated Area and the type of wildfire risk level identified by the electric utility. The table is broken into the Metric Type/Asset with the Unit(s) column defining the value of measurement. Please refer to WMP Shared Terminology filed in docket UM 2340 for additional terminology details.

The data table shall not include any blanks for the reporting year. If a result is not applicable for the indicated metric or timeframe enter zero into the results column and provide a comment if needed. If additional details are provided within the utility’s Wildfire Mitigation Plan provide a note in the comment. The total of all the values in the Non-HFRZ and each of the subsequent HFRZ IDs should be equivalent to the electric utility system totals for the State of Oregon.

Field Name	Field Description	Field Value Constraints
Geographic_Designation_ID <i>(pre-populated with utility defined inputs from cover sheet)</i>	Auto-created reference ID for the specific geographic area sourced from cover sheet.	Numeric ≥ 1
Metric_Type <i>(predefined)</i>	A brief description of the Metric Type: - Primary UG Distribution Lines - Primary Total OH Distribution Lines - Primary OH Spacer Cable Distribution Lines - Primary OH Tree Wire Distribution Lines - Secondary OH Distribution Lines - OH Transmission Lines - UG Transmission Lines - Transmission Substation - Distribution Substation - Connected Device (controllable device) ³ - Connected Device (non-controllable device) - CFCI (sensory) ⁴ - Fuse - Nonexplosion Fuse	Restricted to values indicated in Field Description.

³ If the type of connected devices is not tracked default to Connected Device (non-controllable device).

⁴ Communicating Fault Circuit Indicators (CFCI). Sensors that monitor electric grids to detect potential faults.

Field Name	Field Description	Field Value Constraints
	- Lightning Arrester - Support Structure/pole (includes T & D) - Tree Attached Equipment - Switchgear - Transformer - Camera - Weather Station - Customers⁵ (all customer types) - Commercial meters/customers - Total Acres (Service Territory) - Planned Outages (T & D) - Unplanned Outages (T & D) <i>Note: Transmission lines refer to all lines above 34.5kV, and distribution lines refer to all lines at or below 34.5kV.</i>	
Geographic_Designation_Name <i>(pre-populated with utility defined inputs from cover sheet)</i>	Electric utility defined localized geographic designated subarea.	Text
Risk Designation <i>(pre-populated with utility defined inputs from cover sheet)</i>	The utility defined risk is associated with the Geographic Designated Area, as defined by the electric utility on the cover sheet.	Restricted to values indicated in Field Description.
Unit(s) <i>(pre-defined)</i>	Predefined unit measurements for reporting period metric type.	Restricted to values indicated in Field Description.
‘Year’ <i>(utility provided results for the reporting period identified on cover sheet)</i>	Electric utility provided values for the indicated metric based on the pre-defined units for the reporting period year. Do not leave field blank complete with a zero and comment if needed.	Numeric ≥ 0
Comments <i>(utility provided)</i>	Electric utility provided additional/other comments, if needed.	Text

2.3.2 Table 2: Initiative Data

Table 2 summarizes the electric utilities current WMP initiatives (which shall be described in detail in the annual WMP written report). The inputs into table 2 shall summarize the detailed WMP report initiatives providing an overview of the electric utility’s goals, objectives, targeted risk reduction, alignment with the OPUC’s initiative categories and activities, current status, and the expected

⁵ Meters/customers are representative of a single service location such as a meter.

units and spend for the reporting year. The table is not meant to be source for detailed initiative information but rather a summarized review of initiatives. Table 2 also acts as a complement to Table 13 creating an associated relationship between the electric utilities internal projects and initiatives to the OPUC initiative categories and activities provided in section 3.2. Each initiative activity shall be provided as a record with the following fields:

Field Name	Field Description	Field Value Constraints
UtilityID <i>(pre-populated with utility defined inputs from cover sheet)</i>	Standardized ID of the electric utility; values are as follows: - Idaho Power - PacifiCorp - Portland General Electric	Restricted to values indicated in Field Description
Reporting_Period_Year <i>(pre-populated with utility defined inputs from cover sheet)</i>	Date of submittal of the plan formatted as YYYY.	Date
Initiative_Classification <i>(pre-defined dropdown)</i>	- <u>Program</u> - an ongoing, function or operation (e.g., detailed asset inspections) - <u>Project</u> - a temporary endeavor undertaken to create a unique product, service, or result with a start and end date. (e.g., installing a microgrid, undergrounding a circuit segment, etc.) - <u>Pilot</u> - typically limited in scope, experimental, and exploratory studies of new equipment, technology, etc. for consideration of broader deployment	Restricted to values indicated in Field Description
Start_Date <i>(utility provided)</i>	Start date for initiative	Date
End_Date <i>(utility provided)</i>	Estimated end date for initiative (programs do not need an end date if it is expected to continue through the planning period for the WMP)	Date
Utility_Initiative_Name <i>(utility provided)</i>	Electric utility name for the initiative.	Text
Initiative_Description <i>(utility provided)</i>	A brief description of the initiative. Note that the more detailed description of the initiative shall be provided in the written WMP filing. Use the “WMP_Page_Number” field described below to provide a report reference to the location of the detailed initiative	Text
Initiative_Objective <i>(utility provided)</i>	A brief statement of the initiative activity intent (e.g., what does the electric utility plan to accomplish with this initiative).	Text
WMP_Initiative_Category <i>(pre-defined dropdown)</i>	The WMP Initiative Category under which the subject WMP Initiative Activity is organized. An overview of Initiative Categories is found in section 3.2.	Restricted to values indicated in Field Description.

Field Name	Field Description	Field Value Constraints
WMP_Initiative_Activity (pre-defined dropdown)	The name of the subject WMP Initiative Category-Activity, as provided by OPUC. An overview of Initiative Category-Activities is found in section 3.2. If this value is "Other," provide the Initiative Activity name in the following column Activity_Name_if_Other.	Restricted to values indicated in Field Description.
Activity_Name_if_Other (utility provided)	If WMP_Initiative_Activity was "Other," provide the Initiative Activity name as it is referred to in the electric utility's WMP.	Text
Utility_Initiative_Tracking_ID (utility provided)	The "Utility Initiative Tracking ID" is the unique tracking ID for a given initiative activity. This ID must match the "Utility Initiative Tracking ID" field for the same initiative activity in all data submissions for the initiative's entire lifecycle.	Text
WMP_Page_Number (utility provided)	Page of most recent WMP where initiative is detailed. If the initiative is detailed on multiple pages, indicate the first page.	Integer
Risk_Target_Reduction (pre-defined dropdown)	Risk components targeted for reduction by implementing the initiative ⁶ : - Equipment ignition likelihood - Contact from vegetation ignition likelihood - Contact by object ignition - Wildfire spread - Wildfire hazard - Wildfire exposure potential - Wildfire vulnerability - PSPS likelihood - PSPS exposure potential - PSPS vulnerability	Restricted to values indicated in Field Description.
Unit_Measurement (pre-defined dropdown)	Predefined unit measurements ⁷ for reporting period metric type: - # of acres - # of assets - # of cameras - # of cameras (AI detection) - # of circuit miles - # of critical facilities - # of customer meters belonging to medically	Restricted to values indicated in Field Description.

⁶ See Section 3.3 for definitions.

⁷ Table 2 is structured to provide flexibility for the utility to identify both output (in the form of units of work accomplished) as well as outcomes (in the form of performance metrics) as benefits the utility in demonstration of how relevant that work is relating to wildfire mitigation activities. However, at a minimum output must be provided. Thus, if the utility's initiative goal is a material output the utilities shall report the number of units and unit type associated with the initiative. For example, for an initiative includes the installation of spacer cable the utility shall provide the miles of spacer cable involved.

Field Name	Field Description	Field Value Constraints
	vulnerable populations - # of commercials meters/customers - # of residential meters/customers - # of customers (all customer types) - # of days - # of events - # of hours - # of ignitions - # of incidents - # of line miles - # of meetings - # of meters - # of minutes - # of outages - # of risk events - # of structures - # of substations - # of weather stations - N/A - Other	
'Year'_Actual_Units (utility provided)	Electric utility units for the indicated metric based on the pre-defined units for the reporting period year.	Numeric ≥ 0
'Year'_Actual_\$1000 (utility provided)	Electric utility actual spend (in thousands) for the indicated metric based on the pre-defined units for the reporting period year.	Numeric ≥ 0
Status (pre-defined dropdown)	Initiative activity status designations. Acceptable values are as follows: - Planned - In Progress - Completed - Delayed - Cancelled - Ongoing	Restricted to values indicated in Field Description.
Actions_If_Delayed (utility provided)	If projected progress vs. actual progress indicates a delay in an electric utility's implementation of its initiative activity, the electric utility must detail corrective actions it is taking to address the delay.	Text

2.3.3 Table 3: Inspections (Transmission and Distribution Asset and Vegetation)

Wildfire Mitigation Data Table 3 includes reporting on the electric utility's overall transmission and distribution asset and vegetation inspection programs. This information serves as a gauge for the reporting year inspections based on the asset locations and vegetation clearances for the risk designation. Inspections are categorized based on the inspections type (including a category for any additional ignition prevention inspection programs) and the inspection method. The electric

utility’s inspection types should be linked in conformance with Oregon Administrative Rules (OAR) requirements to show the utilities prudence with OARs. To the extent a program is identified which exceeds or is not required by Oregon administrative rules it must so state. Utilities shall only align an inspection type to “Other”, after all internal programs are linked to an existing OAR. The electric utility should identify in the comment field the utilities aligned internal program name to the applicable OAR.

The data table shall not include any blanks for the reporting year. If a result is not applicable for the indicated metric or timeframe enter zero into the results column and provide a comment if needed. If additional details are provided within the utilities Wildfire Mitigation Plan provide a note in the comment.

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

Field Name	Field Description	Field Value Constraints
Metric_Type (pre-defined)	Overview categorization for input metric. - Asset inspections - Vegetation inspections	Restricted to values indicated in Field Description.
Metric_Name (pre-defined)	A brief description of the metric based on the Metric_Type categorization. Possible Metric_Name include: - Number of assets inspected - Asset circuit miles inspected - Vegetation circuit miles inspected	Restricted to values indicated in Field Description.
Risk Designation (pre-defined)	Non-HFRZ, HFRZ , and Areas of Interest (if applicable).	Restricted to values indicated in Field Description.
Line_Type (pre-defined)	Transmission or Distribution. <i>Note: Transmission lines refer to all lines above 34.5kV, and distribution lines refer to all lines at or below 34.5kV</i>	Restricted to values indicated in Field Description.
Inspection_Type (pre-defined)	Inspection Types - Ignition Prevention Inspection ⁸ - Safety Patrol Inspection ⁹ - Detailed Inspection ¹⁰	Restricted to values indicated in Field Description.

⁸ HFRZ Ignition Prevention Inspection, [OAR 860-240-0001\(6\)](#), Ignition prevention [OAR 860-024-0018\(3\)\(a\)](#).

⁹ Safety Patrol Inspection, [OAR 860-024-0011\(2\)\(c\)](#).

¹⁰ Detail Inspection, [OAR 860-024-0011\(1\)\(B\)](#).

Field Name	Field Description	Field Value Constraints
	- Other Inspections (provide details in the comment field)¹¹ - Routine non-wildfire¹² - Routine wildfire (i.e., AWRR)¹³ - Non-Routine wildfire¹⁴	
Inspection_Method (pre-defined)	Inspection Method - Drone - Aerial - Ground - LiDAR - Satellite - Other (provide details in the comment field)	Restricted to values indicated in Field Description.
Unit(s) (pre-defined)	Predefined unit measurements for reporting period metric type. Note only provide details made in the reporting year. For asset points a single unit applies to the physical location of the asset and all equipment at the singular point (example: a pole and all subsequent equipment on the pole should be identified as a single asset, and counted as one unit)	Restricted to values indicated in Field Description.
Inspection_Frequency (months) (utility provided)	The frequency, in months, that the electric utility performs the inspection based on risk designation, line type, inspection type, and inspection method. Do not leave the field blank. Complete with a zero and comment if needed.	Numeric ≥ 0
'Year'_Q1-3_Inspected (utility provided results for the reporting period identified on cover sheet)	Electric utility value for the indicated metric based on the pre-defined units for January through September of the reporting period year. Do not leave the field blank. Complete with a zero and comment if needed.	Numeric ≥ 0
'Year'_Q4_Inspected (utility provided results for the reporting period)	Electric utility value for the indicated metric based on the pre-defined units for October through December of the reporting period year.	Numeric ≥ 0

-
- ¹¹ Other Inspection Type should only be used once the electric company has aligned all existing programs to the best corresponding OAR inspection above.
- ¹² Vegetation management removal or treatment programs conducted as cycle work, generally associated with clearance compliance with [OAR 860-024-0016](#). See WMP shared terminology “Routine non-wildfire vegetation management”.
- ¹³ 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](#). See WMP shared terminology “Routine wildfire vegetation management”.
- ¹⁴ Vegetation management removal or treatment programs conducted as non-cycle work, not generally associated with clearance compliance with [OAR 860-024-0016](#). See WMP shared terminology “Non-routine vegetation management”.

Field Name	Field Description	Field Value Constraints
<i>identified on cover sheet)</i>	Do not leave the field blank. Complete with a zero and comment if needed.	
Inseption_Comments <i>(utility provided)</i>	If Inspection_Type or Inspection_Method was "Other," provide details. Provide any additional/other comments, if needed.	Text

2.3.4 Table 4: Asset Nonconformance-Correction

Wildfire Mitigation Data Table 4 correlates with the inspection results provided in Table 3. The electric utility nonconformance and correction types should be linked in conformance with Oregon Administrative Rules (OAR) requirements to show company prudence with OARs¹⁵. To the extent a program is identified which exceeds or is not required by Oregon administrative rules it must so state. Utilities shall only align a correction type to “Other”, after all internal programs are linked to an existing OAR correction type. The electric utility should identify in the comment field the utilities aligned internal program name to the applicable OAR.

The data table shall not include any blanks for the reporting year. If a result is not applicable for the indicated metric or timeframe enter zero into the results column and provide a comment if needed. If additional details are provided within the utilities Wildfire Mitigation Plan provide a note in the comment.

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

Field Name	Field Description	Field Value Constraints
Metric_Type <i>(pre-defined)</i>	Overview categorization for input metric. Note this includes a count of pole replaced tree attachments (OAR 860-024-0018(2)) - Tree attachments - Asset nonconformances and correction	Restricted to values indicated in Field Description.
Metric_Name <i>(pre-defined)</i>	A brief description of the metric based on the Metric_Type categorization. Possible Metric_Names include:	Restricted to values indicated in Field Description.

¹⁵ Nonconformance is equal to a probable violation of commission safety rules.

Field Name	Field Description	Field Value Constraints
	- Number of tree attachments and replacements¹⁶ - Priority I ¹⁷ - Priority A ¹⁸ - Priority B ¹⁹ - Priority C ²⁰ - Ignition prevention ²¹	
Risk_Designation (pre-defined)	Non-HFRZ, HFRZ, and Areas of Interest (if applicable).	Restricted to values indicated in Field Description.
Line_Type (pre-defined)	Transmission or Distribution. <i>Note: Transmission lines refer to all lines above 34.5kV, and distribution lines refer to all lines at or below 34.5kV.</i>	Restricted to values indicated in Field Description.
Inspection_Type (pre-defined)	Inspection Types - Ignition Prevention Inspection - Safety Patrol Inspections - Detailed Inspection Other Inspections (provide details in the comment field)	Restricted to values indicated in Field Description.
Inspection_Method (pre-defined)	Inspection Method - Aerial - Drone - Ground - LiDAR - Other (provide details in the comment field)	Restricted to values indicated in Field Description.
Unit(s) (pre-defined)	Predefined unit measurements for reporting period metric type. Note only provide details made in the reporting year. For asset points a single unit applies to the physical location of the asset and all equipment at the singular point (ex: a pole and all subsequent equipment on the pole should be identified as a single asset, and counted as one unit)	Restricted to values indicated in Field Description.
'Year'_Q1-3_Nonconformances (utility provided results for the reporting period)	Electric utility's number of nonconformances based on the pre-defined units for January through September of the reporting period year. Do not leave the field blank. Complete with a zero and comment if needed.	Numeric ≥ 0

¹⁶ Tree attachments, [OAR 860-024-0018\(2\)](#).

¹⁷ Priority I, Imminent Nonconformances. This is a subtype of Priority A, requiring immediate corrective work.

¹⁸ Priority A, Immediate Hazard. [OAR 860-024-0012\(1\)](#). If the finding is worked as an imminent nonconformance/correction do not double count it as a priority A.

¹⁹ Priority B, two-year correction. [OAR 860-024-0012\(2\)](#).

²⁰ Priority C, Deferral. [OAR 860-024-0012\(3\)\(a\)](#).

²¹ Ignition Prevention, 180-day correction. [OAR 860-024-0018\(5\)\(b\)](#).

Field Name	Field Description	Field Value Constraints
'Year'_Q4_ Nonconformances <i>(utility provided results for the reporting period)</i>	Electric utility's number of nonconformances based on the pre-defined units for October through December of the reporting period year. Do not leave the field blank. Complete with a zero and comment if needed.	Numeric ≥ 0
Nonconformance _Comments <i>(utility provided)</i>	Provide any Nonconformance comments, if needed.	Text
'Year'_Q1- 3_Corrections_of_ 'Year'_ Nonconformances <i>(utility provided results for the reporting period)</i>	Electric utility's number of completed corrections found during the reporting year based on the pre-defined units for January through September of the reporting period year. Do not leave the field blank. Complete with a zero and comment if needed.	Numeric ≥ 0
'Year'_Q4_Corrections_of_ 'Year'_ Nonconformances <i>(utility provided results for the reporting period)</i>	Electric utility's number of completed corrections found during the reporting year based on the pre-defined units for October through December of the reporting period year. Do not leave the field blank. Complete with a zero and comment if needed.	Numeric ≥ 0
'Year'_Correction_of_ 'Year-1'_ Nonconformances <i>(utility provided results for the reporting period)</i>	Electric utility's number of completed corrections found during the previous reporting period. For example, the number of 2024 nonconformances that were corrected in the reporting period year (2025). Do not leave the field blank. Complete with a zero and comment if needed.	Numeric ≥ 0
'Year'_Correction_of_ 'Year-2'_ Nonconformances <i>(utility provided results for the reporting period)</i>	Electric utility's number of completed corrections found two years prior to the reporting period. For example, the number of 2023 nonconformances that were corrected in the reporting period year (2025). Do not leave the field blank. Complete with a zero and comment if needed.	Numeric ≥ 0
'Year'_Correction_of_ 'Year-3'_or_Prior_ Nonconformances <i>(utility provided results for the reporting period)</i>	Electric utility's number of completed corrections found three years prior to the reporting period. For example, the number of 2022 or prior nonconformances that were corrected in the reporting period year (2025). Do not leave the field blank. Complete with a zero and comment if needed.	Numeric ≥ 0
Correction_Comments <i>(utility provided)</i>	Provide any correction comments, if needed.	Text
'Year'_Past_Due_ Nonconformances <i>(utility provided results for the reporting period)</i>	Electric utility's number of past due nonconformances, based on the correction period of the nonconformance type, found during the reporting period. For example, for ignition prevention nonconformances provide the number of nonconformances discovered in the reporting period year (2025) that are beyond the 180-day correction period.	Numeric ≥ 0

Field Name	Field Description	Field Value Constraints
	Do not leave the field blank. Complete with a zero and comment if needed.	
'Year-1'_Past_Due_Nonconformances <i>(utility provided results for the reporting period)</i>	Electric utility's number of past due nonconformances, based on the correction period of the nonconformance type, found during the previous reporting period year. For example, for ignition prevention nonconformances provide the number of nonconformances discovered in the prior reporting period year (2024) that are beyond the 180-day correction period. Do not leave the field blank. Complete with a zero and comment if needed.	Numeric ≥ 0
'Year-2'_Past_Due_Nonconformances <i>(utility provided results for the reporting period)</i>	Electric utility's number of past due nonconformances, based on the correction period of the nonconformance type, found two years prior to the current reporting period year. For example, for Priority B nonconformances provide the number of nonconformances discovered in the reporting period year (2023) that are beyond the 2-year correction period. Do not leave the field blank. Complete with a zero and comment if needed.	Numeric ≥ 0
'Year-3'_or_Prior_Past_Due_Nonconformances <i>(utility provided results for the reporting period)</i>	Electric utility's number of past due nonconformances, based on the correction period of the nonconformance type, found three years prior to the current reporting period year. For example, for Priority B nonconformances provide the number of nonconformances discovered in the reporting period year (2022 or prior) that are beyond the 2-year correction period. Do not leave the field blank. Complete with a zero and comment if needed.	Numeric ≥ 0
'Year'_Not_Yet_Due_Nonconformances <i>(utility provided results for the reporting period)</i>	Electric utility's number of nonconformances that are still open and not yet due, based on the correction period of the nonconformance type, found during the reporting period. For example, for ignition prevention nonconformances, provide the number of nonconformances discovered in the reporting period year (2025) that are still within the 180-day correction period. Do not leave the field blank. Complete with a zero and comment if needed.	Numeric ≥ 0
'Year-1'_Not_Yet_Due_Nonconformances <i>(utility provided results for the reporting period)</i>	Electric utility's number of nonconformances that are still open and not yet due, based on the correction period of the nonconformance type, found during the previous reporting period year. For example, for Priority B nonconformances provide the number of remaining nonconformances discovered in the prior reporting period year (2024) that are still within the 2-year correction period. Do not leave the field blank. Complete with a zero and comment if needed.	Numeric ≥ 0

Field Name	Field Description	Field Value Constraints
'Year-2'_Not_Yet_Due_Nonconformances <i>(utility provided results for the reporting period)</i>	Electric utility's number of nonconformances that are still open and not yet due, based on the correction period of the nonconformance type, found two years prior to the current reporting period year. For example, for Priority C nonconformances provide the number of remaining nonconformances discovered in the reporting period year (2023) that are within the 10-year correction period. Do not leave the field blank. Complete with a zero and comment if needed.	Numeric ≥ 0
'Year-3'_or_Prior_Not_Yet_Due_Nonconformances <i>(utility provided results for the reporting period)</i>	Electric utility's number of nonconformances that are still open and not yet due, based on the correction period of the nonconformance type, found three or more years prior to the current reporting period year. For example, for Priority C nonconformances provide the number of remaining nonconformances discovered in the reporting period year (2022) that are within the 10-year correction period. Do not leave the field blank. Complete with a zero and comment if needed.	Numeric ≥ 0
Status_Comments <i>(utility provided)</i>	Provide any comments on the status, if needed.	Text

2.3.5 Table 5: Veg Nonconformances-Correction

Wildfire Mitigation Data Table 5 includes vegetation management nonconformances and corrections which took place in the relevant reporting year. This information summarizes vegetation program actions for the reporting year. The electric utility vegetation inspection types should be linked in conformance with Oregon Administrative Rules (OAR) requirements to show company prudence with OARs. To the extent a program is identified which exceeds or is not required by Oregon administrative rules it must so state. The electric utility should identify in the comment field the utilities aligned internal program name to the applicable OAR.

The data table shall not include any blanks for the reporting year. If a result is not applicable for the indicated metric or timeframe enter zero into the results column and provide a comment if needed. If additional details are provided within the utilities Wildfire Mitigation Plan provide a note in the comment.

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

Field Name	Field Description	Field Value Constraints
Metric_Type <i>(pre-defined)</i>	Overview categorization for input metric. - Tree nonconformance and correction - Tree mile nonconformance and correction	Restricted to values indicated in Field Description.
Metric_Name <i>(pre-defined)</i>	A brief description of the metric based on the Metric_Type categorization. Possible Metric_Names include: - Tree trims - Circuit mile tree trims ²² - Tree removals - Circuit mile tree removals	Restricted to values indicated in Field Description.
Risk_Designation <i>(pre-defined)</i>	Non-HFRZ, HFRZ, and Areas of Interest (if applicable).	Restricted to values indicated in Field Description.
Line_Type <i>(pre-defined)</i>	Transmission or Distribution. <i>Note: Transmission lines refer to all lines above 34.5kV, and distribution lines refer to all lines at or below 34.5kV</i>	Restricted to values indicated in Field Description.
Inspection_Type <i>(pre-defined)</i>	Inspection Types - Routine non-wildfire ¹² - Routine wildfire (i.e., AWRR) ¹³ - Non-Routine wildfire ¹⁴	Restricted to values indicated in Field Description.
Inspection_Method <i>(pre-defined)</i>	Inspection Method - Satellite - Ground - LiDAR - Other (provide details in the comment field)	Restricted to values indicated in Field Description.
Unit(s) <i>(pre-defined)</i>	Predefined unit measurements for reporting period metric type. Note only provide details made in the reporting year.	Restricted to values indicated in Field Description.
'Year'_Q1-3_ Nonconformances <i>(utility provided results for the reporting period identified on cover sheet)</i>	Electric utility provided values for the indicated metric based on the pre-defined units for January through September of the reporting period year. Do not leave the field blank. Complete with a zero and comment if needed.	Numeric ≥ 0
'Year'_Q4_ Nonconformances <i>(utility provided results for the reporting period identified on cover sheet)</i>	Electric utility provided values for the indicated metric based on the pre-defined units for October through December of the reporting period year. Do not leave the field blank. Complete with a zero and comment if needed.	Numeric ≥ 0

²² For circuit mile units calculate the number of findings/nonconformances for tree trimmed and tree removals per mile for the risk designation area. This is used to help determine the frequency of tree trimming and removals based on the number of miles inspected each year.

Field Name	Field Description	Field Value Constraints
Nonconformances _Comments <i>(utility provided)</i>	If Inspection_Type or Inspection_Method was "Other," provide details. Provide any additional/other comments, if needed.	Text
'Year'_Q1-3_Corrections_of_ 'Year'_Nonconformances <i>(utility provided results for the reporting period)</i>	Electric utility's number of completed corrections found during the reporting year based on the pre-defined units for January through September of the reporting period year. Do not leave the field blank. Complete with a zero and comment if needed.	Numeric ≥ 0
'Year'_Q4_Corrections_of_ 'Year'_Nonconformances <i>(utility provided results for the reporting period)</i>	Electric utility's number of completed corrections found during the reporting year based on the pre-defined units for October through December of the reporting period year. Do not leave the field blank. Complete with a zero and comment if needed.	Numeric ≥ 0
Correction_Comments <i>(utility provided)</i>	Provide any correction comments, if needed.	Text

2.3.6 Table 6: Performance Metrics

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

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

Field Name	Field Description	Field Value Constraints
Comments (utility provided)	Electric utility provided additional/other comments, if needed.	Text

2.3.7 Table 7: Risk Performance

Table 7 summarizes risk and performance metrics quarterly over the relative reporting period. The electric utilities shall provide information based on weather patterns significant to fire risk potential, such as: Red Flag Warning (RFW), High Wind Warning (HWW),²³ and Fire Potential Index (FPI), which have thought to be conducive to ignition and fire spread. Table 7 seeks to isolate system risk events as a result of weather-related events and their occurrence across the non-identified and identified risk designation areas. The table also summarizes system reliability metrics, including and excluding planned events. And finally, the table seeks customer inquiries and complaints for the relevant reporting period.

The data table shall not include any blanks for the reporting year. If a result is not applicable for the indicated metric or timeframe enter zero into the results column and provide a comment if needed. Provide a note in the comment field if there are limitations to calculating the data and/or if additional details are provided within the utility's Wildfire Mitigation Plan.

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

Field Name	Field Description	Field Value Constraints
Metric_Type (pre-defined)	Overview categorization for input metric - Risk Events - General Reliability Metrics	Restricted to values indicated in Field Description.
Metric_Name (pre-defined)	A brief description of the metric based on the Metric_Type categorization. Possible Metric_Names include: - Number of unplanned fault events (forced outages), including wires down, line slap/wire to wire contact, contacts with objects, events with evidence of heat generation, and other situations that have the potential to serves as an ignition source.	Restricted to values indicated in Field Description.

²³ Red Flag Warning and High Wind Warning are defined by the National Weather Service;
<https://mesonet.agron.iastate.edu/request/gis/watchwarn.phtml>.

Field Name	Field Description	Field Value Constraints
	- Number of wires down - Number of outage events not caused by contact with vegetation - Number of outage events caused by contact with vegetation - Number of ignitions - Number of ignitions reported for OAR 860-024-0050 on FM221 ²⁴ - Red Flag Warning Only overhead circuit mile days - High Wind Warning Only overhead circuit mile days - Red Flag Warning and High Wind Warning overhead circuit mile day ²⁵ - Fire Potential Index circuit mile days - Other circuit mile days (note metric type used in the comment field) - Number of forced outages on circuits or circuit segments with non-reclosing but not due to active utility work. - Customer hours of interruption due to forced outages on circuits or circuit segments with non-reclosing but not due to active utility work. - Total customer interruptions due to forced outages on circuits or circuit segments with non-reclosing but not due to active utility work. - Number of forced outages on circuits or circuit segments with non-reclosing due to active utility work. - Customer hours of interruption due to forced outages on circuits or circuit segments with non-reclosing due to active utility work. - Total customer interruptions due to forced outages on circuits or circuit segments with non-reclosing due to active utility work. - Number of forced outages on circuits or circuit segments with sensitive settings for risk period but not due to active utility work. - Customer hours of interruption due to forced outages on circuits or circuit segments with alternate settings for risk period but not due to active utility work. - Total customer interruptions due to forced outages on circuits or circuit segments with alternate	

²⁴ [OAR 860-024-0050](#) and [form](#).

²⁵ Red Flag Warning and High Wind Warning reflect times when a Red Flag Warning and High Wind Warning are occurring simultaneously at a given location.

Field Name	Field Description	Field Value Constraints
	settings for risk period but not due to active utility work. - Number of forced outages on circuits or circuit segments with non-sensitive settings in place. - Customer hours of interruption due to forced outages on circuits or circuit segments with default settings in place. - Total customer interruptions due to forced outages on circuits or circuit segments with default settings in place. - Number of planned outages on circuits or circuit segments not due to PSPS. - Customer hours of interruption due to planned outages on circuits or circuit segments not due to PSPS. - Total customer interruptions due to planned outages on circuits or circuit segments not due to PSPS. - Number of planned outages on circuits or circuit segments due to PSPS. - Customer hours of interruption due to planned outages on circuits or circuit segments due to PSPS. - Total customer interruptions due to planned outages on circuits or circuit segments due to PSPS. - System Average Interruption Duration Index (SAIDI) (no exclusions, including: PSPS, Planned, and Major Events).²⁶ - System Average Interruption Frequency Index (SAIFI) (no exclusions, including: PSPS, Planned, and Major Events). - System Average Interruption Duration Index (SAIDI) (including PSPS and planned, excluding major events). - System Average Interruption Frequency Index (SAIFI) (including PSPS and planned, excluding major events). - System Average Interruption Duration Index (SAIDI) (includes planned, excluding major events and PSPS). - System Average Interruption Frequency Index (SAIFI) (includes planned, excluding major events and PSPS). - System Average Interruption Duration Index (SAIDI)	

²⁶ SAIDI and SAIFI values should align with annual reliability reports. Using the electric utilities static annual total customers count used in Annual Reliability reports.

Field Name	Field Description	Field Value Constraints
	(excludes major events, PSPS, and planned). - System Average Interruption Frequency Index (SAIFI) (excludes major events, PSPS, and planned). - Count of customer reliability inquiries. - Count of customer reliability complaints. ²⁷ - Count of customer OPUC recorded reliability complaints.	
Warning_Status (pre-defined)	Designation index of Red Flag Warning (RFW only), High Wind Warning (HWW only), HWW & RFW, ²⁸ and Fire Potential Index (FPI).	Restricted to values indicated in Field Description.
Risk_Designation (pre-defined)	Non-HFRZ, HFRZ , and Areas of Interest (if applicable).	Restricted to values indicated in Field Description.
Unit(s) (pre-defined)	Predefined unit measurements for reporting period metric type. - Number of events subject to Metric_Name - Number of hours subject to Metric_Name - Total number of customers subject to Metric_Name - Number of ignitions - Sum of overhead circuit miles of utility grid subject to Metric_Type, Metric_Name, and Wind_Warning_Status - Customer hours per year subject to Metric_Name - Duration (SAIDI) subject to Metric_Name - Frequency (SAIFI) subject to Metric_Name - Count of customer inquiries or complaints subject to Metric_Name	Restricted to values indicated in Field Description.
'Year'_Q1 (utility provided results for Q1 of reporting period identified on cover sheet)	Values for the indicated metric for the first quarter (January through March) of the reporting period year.	Numeric ≥ 0,
'Year'_Q2 (utility provided results for Q2 of reporting period identified on cover sheet)	Values for the indicated metric for the second quarter (April through June) of the reporting period year.	Numeric ≥ 0
'Year'_Q3 (utility provided results for Q3 of reporting period identified on cover sheet)	Values for the indicated metric for the third quarter (July through September) of the reporting period year.	Numeric ≥ 0

²⁷ These include inquiries that were escalated to customer care teams.

²⁸ HWW and RFW reflect times when a High Wind Warning and a Red Flag Warning are occurring simultaneously at a given location.

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

2.3.8 Table 8: Risk Event Drivers

Table 8 includes wire down and outage events that are not associated with an ignition. For the purposes of this table, wire down events are any wire down event that may or may not have caused an unplanned outage. Any forced/unplanned outage which did not result in a downed wire should be included in the "Unplanned Outage" portion of the Risk_Event_Category. All risk events should include major events and exclude ignition events.

Electric Utilities should align internal outage cause codes to those outlined in section 3.1 of this guideline which contains a table for possible risk event categories, types, and drivers (aligned to IEEE 1782-2022). If there is a case where, after best efforts are made, a company's internal outage cause cannot be aligned to a specific risk event or category then include the results in "Other/Other".

The data table shall not include any blanks for the reporting year. If a result is not applicable for the indicated metric or timeframe enter zero into the results column and provide a comment if needed. Provide a note in the comment field if there are limitations to calculating the data and/or if additional details are provided within the utility's Wildfire Mitigation Plan.

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

Field Name	Field Description	Field Value Constraints
Risk_Event_Category (pre-defined)	Overview categorization of the adverse effects from a hazard considering the consequences and frequency of the hazard occurring for the input metric. Data is either considered a wire down event (which did not result in an unplanned outage but may have caused the electric utility to voluntarily de-energize) or an unplanned outage (an event in which asset protection system responded causing an unplanned outage) No ignition occurred. See section 3.1.	Restricted to values indicated in Field Description.
Risk_Event_Type (pre-defined)	Outage or event risk classification type for reporting outage category/type. See section 3.1.	Restricted to values indicated in Field Description.
Risk_Event_Driver (pre-defined)	Outage or event driver subclassifications for reporting outage category/type/driver. See section 3.1. ²⁹	Restricted to values indicated in Field Description.
Line_Type (pre-defined)	Transmission or Distribution. <i>Note: Transmission lines refer to all lines above 34.5kV, and distribution lines refer to all lines at or below 34.5kV</i>	Restricted to values indicated in Field Description.
Risk_Designation (pre-defined)	Non-HFRZ, HFRZ, and Areas of Interest (if applicable).	Restricted to values indicated in Field Description.
Unit(s) (pre-defined)	Predefined unit measurements for reporting period risk drivers. Number of risk events.	Restricted to values indicated in Field Description.
'Year'_Q1 (utility provided results for Q1 of reporting period identified on cover sheet)	Number of risk events for the indicated metric for the first quarter (January through March) of the reporting period year. All risk events should include major events and exclude ignition events.	Numeric ≥ 0

²⁹ **Equipment:** If the utility is currently unable to differentiate the risk event sub-driver for equipment they shall default to the equipment degradation sub-driver. **Extreme Weather Outages:** Equipment outages which are the result of a non-lightning weather condition should be tracked under the Equipment Category with the subcategory of Environmental-Structural Elements, Environmental-Line Element, Environmental-Protective/Control Device, Environmental-Voltage Control, Environmental-Other, or Environmental-Unknown. **Lightning Strikes:** If the utility does not capture if a lightning strike was direct or indirect, default lightning strikes as indirect and add a comment noting the utility does not differentiate the type of lightning strike. **Vegetation Clearance Zone:** if the utility does not track clearance zones for vegetation audits, default to Vegetation Outside Clearance Zone.

Field Name	Field Description	Field Value Constraints
'Year'_Q2 <i>(utility provided results for Q2 of reporting period identified on cover sheet)</i>	Number of risk events for the indicated metric for the second quarter (April through June) of the reporting period year. All risk events should include major events and exclude ignition events.	Numeric ≥ 0
'Year'_Q3 <i>(utility provided results for Q3 of reporting period identified on cover sheet)</i>	Number of risk events for the indicated metric for the third quarter (July through September) of the reporting period year. All risk events should include major events and exclude ignition events.	Numeric ≥ 0
'Year'_Q4 <i>(utility provided results for Q4 of reporting period identified on cover sheet)</i>	Number of risk events for the indicated metric for the fourth quarter (October through December) of the reporting period year. All risk events should include major events and exclude ignition events.	Numeric ≥ 0
'Year'_Fire_Season <i>(utility provided results for Fire-Season of reporting period identified on cover sheet)</i>	Values for the indicated metric for the electric utility's designated fire season of the reporting period year.	Numeric ≥ 0
'Year'_Non-Fire_Season <i>(utility provided results for Non-Fire Season of reporting period identified on cover sheet)</i>	Values for the indicated metric for the electric utility's designated non-fire season of the reporting period year.	Numeric ≥ 0
Comments <i>(utility provided)</i>	Provide any additional/other comments, if needed.	Text

2.3.9 Table 9: Ignition Events

Table 9 contains ignition data focused on cause based on ignition event driver, event type, line type, and the utilities risk designation. For the purposes of this table, ignition events are to follow the same reporting requirements as OAR 860-024-0050(3)³⁰ and shall align with FM221 reports. Record events that caused a reportable ignition should not be included in Table 8: Risk Event Drivers.

Electric Utilities should align ignition codes to those outlined in section 3.1 of this guideline which contains a table for possible risk event categories, types, and drivers (aligned to IEEE 1782-2022). If there is a case where, after best efforts are made, a company's ignition code cannot be aligned to a specific risk event or category then include the results in "Other/Other".

The data table shall not include any blanks for the reporting year. If a result is not applicable for the indicated metric or timeframe enter zero into the results column and provide a comment if needed. Provide a note in the comment field if there are limitations to calculating the data and/or if additional details are provided within the utility's Wildfire Mitigation Plan.

³⁰ [OAR 860-024-0050](#).

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

Field Name	Field Description	Field Value Constraints
Ignition_Event_Type <i>(pre-defined)</i>	Ignition event cause type. See section 3.1.	Restricted to values indicated in Field Description.
Ignition_Event_Driver <i>(pre-defined)</i>	Ignition event type/driver. See section 3.1. ²⁹	Restricted to values indicated in Field Description.
Line_Type <i>(pre-defined)</i>	Transmission or Distribution. <i>Note: Transmission lines refer to all lines above 34.5kV, and distribution lines refer to all lines at or below 34.5kV.</i>	Restricted to values indicated in Field Description.
Risk_Designation <i>(pre-defined)</i>	Non-HFRZ, HFRZ, and Areas of Interest (if applicable).	Restricted to values indicated in Field Description.
Unit(s) <i>(pre-defined)</i>	Description of units used to measure and report risk metrics. Number of ignitions.	Restricted to values indicated in Field Description.
‘Year’_Q1 <i>(utility provided results for Q1 of reporting period identified on cover sheet)</i>	Number of ignitions for the indicated metric for the first quarter (January through March) of the reporting period year.	Numeric ≥ 0
‘Year’_Q2 <i>(utility provided results for Q2 of reporting period identified on cover sheet)</i>	Number of ignitions for the indicated metric for the second quarter (April through June) of the reporting period year.	Numeric ≥ 0
‘Year’_Q3 <i>(utility provided results for Q3 of reporting period identified on cover sheet)</i>	Number of ignitions for the indicated metric for the third quarter (July through September) of the reporting period year.	Numeric ≥ 0
‘Year’_Q4 <i>(utility provided results for Q4 of reporting period identified on cover sheet)</i>	Number of ignitions for the indicated metric for the fourth quarter (October through December) of the reporting period year.	Numeric ≥ 0
‘Year’_Fire_Season <i>(utility provided results for Fire-Season of reporting period identified on cover sheet)</i>	Values for the indicated metric for the electric utility’s designated fire season of the reporting period year.	Numeric ≥ 0
‘Year’_Non-Fire_Season <i>(utility provided results for Non-Fire Season of reporting period identified on cover sheet)</i>	Values for the indicated metric for the electric utility’s designated non-fire season of the reporting period year.	Numeric ≥ 0

Field Name	Field Description	Field Value Constraints
<i>on cover sheet)</i>		
Comments (utility provided)	Provide any additional/other comments, if needed.	Text

2.3.10 Table 10: Asset Index

Table 10 breaks electric utility equipment and customer counts across the utilities Plan_Year_Risk_Designation, Urban/Suburban/Rural,³¹ and Wildland-urban interface (WUI) status.³² Note that totals for the various Metric_Types shall all be aligned with totals provided in Table 1.

The data table shall not include any blanks for the reporting year. If a result is not applicable for the indicated metric or timeframe enter zero into the results column and provide a comment if needed. Provide a note in the comment field if there are limitations to calculating the data and/or if additional details are provided within the utility's Wildfire Mitigation Plan.

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

Field Name	Field Description	Field Value Constraints
Metric_Type (pre-defined)	Overview categorization for input metric. - Overhead circuit miles - Underground circuit miles - Critical facilities - Residential Meter - Commercial Meter - Medically vulnerable customer meters	Restricted to values indicated in Field Description.

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

³² WUI is the line, area, or zone where structures and other human development meet or intermingle with undeveloped wildland or vegetation fuels consistent with to OAR 629-044-1011.
<https://arcg.is/1OHjmf1>.

Field Name	Field Description	Field Value Constraints
	- Substations ³³ - Weather stations - Cameras	
Line_Type (pre-defined)	Overview categorization for input metric - Primary total OH distribution lines - Primary OH spacer cable distribution lines - Primary OH tree wire distribution lines - Transmission - Primary total UG distribution lines - N/A <i>Note: Transmission lines refer to all lines above 34.5kV, and distribution lines refer to all lines at or below 34.5kV.</i>	Restricted to values indicated in Field Description.
Risk_Designation (pre-defined)	Non-HFRZ, HFRZ , and Areas of Interest (if applicable).	Restricted to values indicated in Field Description.
Area_Type (pre-defined)	Area type is based on System characterization³¹ - Rural - Suburban - Urban	Restricted to values indicated in Field Description.
WUI_Status (pre-defined)	Wildland urban interface³² - WUI - Non-WUI	Restricted to values indicated in Field Description.
Unit(s) (pre-defined)	Predefined unit measurements for reporting period metric type include, - Circuit miles, excluding secondary - Circuit miles - # of residential meters - # of commercial meters - # of customer meters belonging to medically vulnerable populations - # of substations - # of weather stations - # of cameras	Restricted to values indicated in Field Description.
'Year' (utility provided results for the reporting period identified on cover sheet)	Electric utility provided values for the indicated metric based on the pre-defined units for the reporting period year.	Numeric ≥ 0

³³ For substation, weather stations, and cameras Area_Type classification the utility shall added up all customer meters within a half mile radius and associated the Area_Type noted in footnote 28.

Field Name	Field Description	Field Value Constraints
Comments (utility provided)	Electric utility provided additional/other comments, if needed.	Text

2.3.11 Table 11: Asset Index Changes

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

The data table shall not include any blanks for the reporting year. If a result is not applicable for the indicated metric or timeframe enter zero into the results column and provide a comment if needed. Provide a note in the comment field if there are limitations to calculating the data and/or if additional details are provided within the utility's Wildfire Mitigation Plan.

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

Field Name	Field Description	Field Value Constraints
Metric_Type (pre-defined)	Overview categorization for input metric. - Overhead circuit miles - Underground circuit miles - Substations³³ - Weather stations - Cameras	Restricted to values indicated in Field Description.
Line_Type (pre-defined)	Overview categorization for input metric - Primary total OH distribution lines - Primary OH spacer cable distribution lines - Primary OH tree wire distribution lines - Transmission - Primary total UG distribution lines - N/A Transmission or Distribution. <i>Note: Transmission lines refer to all lines above 34.5kV, and distribution lines refer to all lines at or below 34.5kV.</i>	Restricted to values indicated in Field Description.
Risk_Designation (pre-defined)	Non-HFRZ, HFRZ , and Areas of Interest (if applicable).	Restricted to values indicated in Field Description.

Field Name	Field Description	Field Value Constraints
Area_Type (pre-defined)	Area type is based on System characterization ³¹ - Rural - Suburban - Urban	Restricted to values indicated in Field Description.
WUI_Status (pre-defined)	Wildland urban interface ³² - WUI - Non-WUI	Restricted to values indicated in Field Description.
Unit(s) (pre-defined)	Predefined unit measurements for reporting period metric type. - Circuit miles, excluding secondary - Circuit miles - # of substations - # of weather stations - # of cameras	Restricted to values indicated in Field Description.
'Year+1'_Additions (utility provided results for the reporting period identified on cover sheet)	Electric utility provided planned additions for the following reporting year based on Area_Type and WUI_Status for the indicated metric.	Numeric ≥ 0
'Year+1'_Removals (utility provided results for the reporting period identified on cover sheet)	Electric utility provided planned removals for the following reporting year based on Area_Type and WUI_Status for the indicated metric.	Numeric ≥ 0
'Year+1'_Upgrades (utility provided results for the reporting period identified on cover sheet)	Electric utility provided Planned upgrades for the following reporting year based on Area_Type and WUI_Status for the indicated metric.	Numeric ≥ 0
Comments (utility provided)	Electric utility provided additional/other comments, if needed.	Text

2.3.12 Table 12: De-energization and PSPS Metrics

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

The data table shall not include any blanks for the reporting year. If a result is not applicable for the indicated metric or timeframe enter zero into the results column and provide a comment if needed. Provide a note in the comment field if there are limitations to calculating the data and/or if additional details are provided within the utility's Wildfire Mitigation Plan.

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

Field Name	Field Description	Field Value Constraints
Metric_Type <i>(pre-defined)</i>	Overview categorization for input metric. - Sensitive settings - Proximity utility fire encroachment de-energizations³⁴ - Proximity dictated fire suppression agency (FS) requested de-energization - Public safety power shutoff	Restricted to values indicated in Field Description.
Metric_Name <i>(pre-defined)</i>	A brief description of the metric based on the Metric_Type categorization. Possible Metric_Names: - Frequency of Metric_Type - Circuit mile days of Metric_Type - Scope of Metric_Type - Duration of Metric_Type - Customers experiencing of Metric_Type - SAIDI of Metric_Type - SAIFI of Metric_Type - CAIDI of Metric_Type - Critical Infrastructure impacted by PSPS	Restricted to values indicated in Field Description.
Wind_Warning_Status <i>(pre-defined)</i>	Designation index of - Red Flag Warning (RFW) - High Wind Warning (HWW) - RFW & HWW²⁸ - All (regardless of RFW/HWW status) - N/A	Restricted to values indicated in Field Description.
Risk_Designation <i>(pre-defined)</i>	Non-HFRZ, HFRZ , and Areas of Interest (if applicable).	Restricted to values indicated in Field Description.
Unit(s) <i>(pre-defined)</i>	Predefined unit measurements for reporting period metric type. - Number of outages - Circuit mile days - Number of instances where utility operating protocol requires de-energization of a circuit or portion thereof to reduce ignition probability, per year; an event is one occurrence that can include multiple zones beginning at the same time and date - Circuit-events, measured in number of events multiplied	Restricted to values indicated in Field Description.

³⁴ Refers to fire encroachment and the utilities decision to de-energize.

Field Name	Field Description	Field Value Constraints
	by number of circuits de-energized per year; an event is one occurrence that can include multiple zones beginning at the same time - Customer hours per year (Customer count * Minutes out) - Total Customers experiencing Metric_Name - Minutes (SAIDI, CAIDI) - Frequency (SAIFI) - Number of critical infrastructure locations impacted per hour multiplied by hours offline per year	
'Year'_Q1-3 <i>(utility provided results for the reporting period identified on cover sheet)</i>	Electric utility provided values for the indicated metric based on the pre-defined units for January through September of the reporting period year.	Numeric ≥ 0
'Year'_Q4 <i>(utility provided results for the reporting period identified on cover sheet)</i>	Electric utility provided values for the indicated metric based on the pre-defined units for October through December of the reporting period year.	Numeric ≥ 0
'Year'_Fire_Season <i>(utility provided results for Fire-Season of reporting period identified on cover sheet)</i>	Values for the indicated metric for the electric utility's designated fire season of the reporting period year.	Numeric ≥ 0
'Year'_Non-Fire_Season <i>(utility provided results for Non-Fire Season of reporting period identified on cover sheet)</i>	Values for the indicated metric for the electric utility's designated non-fire season of the reporting period year.	Numeric ≥ 0
Comments <i>(utility provided)</i>	Provide any additional/other comments, if needed.	Text

2.3.13 Table 13: Mitigation Initiative Targets

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

Field Name	Field Description	Field Value Constraints
Initiative_Category <i>(pre-defined)</i>	The WMP Initiative Category under which the subject WMP Initiative Activity is organized. An overview of Initiative Categories is found in section 3.2.	Restricted to values indicated in Field Description.
WMP_Initiative_Activity <i>(pre-defined)</i>	The name of the subject WMP Initiative Activity, as provided by OPUC. An overview of Initiative Category-Activities is found in section 3.2. If this value is “Other,” provide the Initiative Activity name in the Comments.	Restricted to values indicated in Field Description.
Expense_Type	Electric utility expenditure source/allocation. - Capital - O & M	Restricted to values indicated in Field Description.
Area_of_Application/Risk_Designation <i>(pre-defined dropdown)</i>	If blank, select ‘System’ or ‘Oregon Allocated’ ³⁵ (reference section 3.2 for applicable initiative category activities). If selecting ‘System’ please provide the Oregon allocation % in the comments. Non-HFRZ or HFRZ, and Areas of Interest (if applicable).	Restricted to values indicated in Field Description.
Program_Provisioner <i>(pre-defined dropdown)</i>	Select from the dropdown options: - Contractor - Company - Contractor and Company - Outsourced	Restricted to values indicated in Field Description.
Geographic_Designation_ID(s)-if_multiple_separate_by_semi-colon <i>(utility provided)</i>	Provide the Geographic Designations number as defined in the Cover Sheet of the workbook. (if applicable)	Text
Utility_Initiative_Tracking_ID <i>(utility provided)</i>	The “Utility Initiative Tracking ID” is the unique tracking ID for a given initiative activity. This ID must match the "Utility Initiative Tracking ID" field for the same initiative activity in all data submissions for the initiative’s entire lifecycle and must link with Utility_Initiative_Tracking_ID in Table 2.	Text
Primary_Driver_Targeted <i>(pre-defined dropdown)</i>	Primary risk driver component / outcome metric which is expected to be impacted by the initiative activity. A summary of risk drivers can be found in section 3.1 Risk and Ignition Event Table.	Restricted to values indicated in Field Description.
Secondary_Driver_Targeted <i>(pre-defined dropdown)</i>	Secondary risk driver component / outcome metric which is expected to be impacted by the initiative activity. A summary of risk drivers can be found in section 3.1 Risk and Ignition Event Table.	Restricted to values indicated in Field Description.

³⁵ If wildfire unit and cost entries provided in the table are associated with multiple states, select ‘System’ and provide the Oregon allocation % in the comments. If wildfire unit and cost entries provided in the table are associated only in Oregon select ‘Oregon Allocated’. Utilities should make their best effort to provide information specific to Oregon.

Field Name	Field Description	Field Value Constraints
Year_Initiated (utility provided)	Year Initiative program began.	Text (YYYY)
Funding_Source (pre-defined dropdown)	Programing funding source: - Ratepayer-AAC - Ratepayer-GRC - Deferral/Amortization - Grant - Other cost recovery - Combined	Restricted to values indicated in Field Description.
Funding_Source_Order,_ Funder,_ Other (utility provided)	Provide funding source details -If authorized through Commission docket provide order -If not, provide funder name	Text
If_Proposed_Program(Y/N) (pre-defined dropdown)	Program proposal: - New - Existing - No	Restricted to values indicated in Field Description.
Relevant_regulation(s)-if multiple_separate_by_semi -colon (utility provided)	Reference OARs related to initiative	Text
Current_Compliance_ Status (pre-defined dropdown)	Electric utility assessment of in compliance/ exceeding compliance with regulations: - In - Exceeding - N/A	Restricted to values indicated in Field Description.
Non-disaggregated_Spend (utility provided)	If spend not disaggregated by initiative activity, note initiative category for the spend or mark general operations.	Text
Unit_Measurement (pre-defined dropdown)	Select from dropdown the applicable predefined unit measurements for reporting period. Based on previous tables. ⁷ - # of acres - # of assets - # of cameras - # of cameras (AI detection) - # of circuit miles - # of critical facilities - # of customer meters belonging to medically vulnerable populations - # of commercial meters/customers - # of residential meters/customers - # of customers (all customer types) - # of days - # of events - # of hours - # of ignitions	Restricted to values indicated in Field Description.

Field Name	Field Description	Field Value Constraints
	- # of incidents - # of line miles - # of meetings - # of meters - # of minutes - # of outages - # of risk events - # of structures - # of substations - # of weather stations - N/A - Other	
'Year-1'_Completed_Units (utility provided)	Actual electric utility total completed units for the reporting period year -1.	Numeric ≥ 0, or blank
'Year-1'_Actual_\$1000 (utility provided)	Actual electric utility total expenditure for the reporting period year - 1. Must be reported in thousands of dollars.	Numeric ≥ 0, or blank
'Year'_Projected_Units (utility provided)	Electric utility projected units for the reporting period year.	Numeric ≥ 0, or blank
'Year'_Projected_\$1000 (utility provided)	Electric utility projected expenditure for the reporting period year. Must be reported in thousands of dollars.	Numeric ≥ 0, or blank
'Year'_Completed_Units (utility provided)	Actual electric utility total completed units for the reporting period year.	Numeric ≥ 0, or blank
'Year'_Actual_\$1000 (utility provided)	Actual electric utility total expenditure for the reporting period year. Must be reported in thousands of dollars.	Numeric ≥ 0, or blank
'Year'+1_Projected_Units (utility provided)	Electric utility projected units for the reporting period year +1.	Numeric ≥ 0, or blank
'Year'+1_Projected_\$1000 (utility provided)	Electric utility projected expenditure for the reporting period year +1. Must be reported in thousands of dollars.	Numeric ≥ 0, or blank
'Year'+2_Projected_Units (utility provided)	Electric utility projected units for the reporting period year +2.	Numeric ≥ 0, or blank
'Year'+2_Projected_\$1000 (utility provided)	Electric utility projected expenditure for the reporting period year + 2. Must be reported in thousands of dollars.	Numeric ≥ 0, or blank
'Year'+3_Projected_Units (utility provided)	Electric utility projected units for the reporting period year +3.	Numeric ≥ 0, or blank
'Year'+3_Projected_\$1000 (utility provided)	Electric utility projected expenditure for the reporting period year +3. Must be reported in thousands of dollars.	Numeric ≥ 0, or blank
Comments (utility provided)	Provide any additional/other comments if needed. Comments must be added if WMP_Initiative_Category is "Other". If selecting 'System' for the area allocation, please provide the Oregon allocation % in the comments.	Text

3 Risk and Ignition Event Categorizations

3.1 Risk and Ignition Event Table

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

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

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

3.2 Initiative Categories and Activities

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

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

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

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

3.3 Risk Target Reduction

The table below outlines the various risk reductions associated with mitigation initiative categories and activities.

Risk Target Reduction	Definition
Equipment Ignition Likelihood	The likelihood that electric corporation-owned equipment will cause an ignition either through normal operation (such as arcing) or through failure.
Contact From Vegetation Ignition Likelihood	The likelihood that vegetation will contact electric corporation-owned equipment and result in an ignition.
Contact by Object Ignition Likelihood	The likelihood that a non-vegetative object (such as a balloon or vehicle) will contact electric corporation-owned equipment and result in an ignition.
Wildfire Hazard	The potential intensity of a wildfire at a specific location within the service territory given a probabilistic set of weather profiles, vegetation, and topography.
Wildfire Spread	The likelihood that a wildfire with a nearby but unknown ignition point will burn a specific location within the service territory based on a probabilistic set of weather profiles, vegetation, and topography.
Wildfire Exposure Potential	The potential physical, social, or economic impact of wildfire on people, property, critical infrastructure, livelihoods, health, environmental services, local economies, cultural/historical resources, and other high-value assets. These may include direct or indirect impacts, as well as short- and long-term impacts.
Wildfire Vulnerability	The susceptibility of people or a community to adverse effects of a wildfire, including all characteristics that influence their capacity to anticipate, cope with, resist, and recover from the adverse effects of a wildfire (e.g., access and functional needs customers, Social Vulnerability Index, age of structures, firefighting capacities).
PSPS Exposure Potential	The potential physical, social, or economic impact of a PSPS event on people, property, critical infrastructure, livelihoods, health, local economies, and other high-value assets.
PSPS Vulnerability	The susceptibility of people or a community to adverse effects of a PSPS event, including all characteristics that influence their capacity to anticipate, cope with, resist, and recover from the adverse effects of a PSPS event (e.g., high AFN population, poor energy resiliency, low socioeconomics)
Other	Other risk target deduction that is not defined above or where an initiative addresses multiple risk targets.