

ORDER NO. 26-222

ENTERED Jun 25 2026

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UM 2208

In the Matter of

PORTLAND GENERAL ELECTRIC
COMPANY,

Wildfire Protection Plan.

ORDER

DISPOSITION: STAFF'S RECOMMENDATION ADOPTED

At its Special Public Meeting on June 25, 2026, the Public Utility Commission of Oregon adopted Staff's recommendation in this matter. The Staff Report with the recommendation is attached as Appendix A.

BY THE COMMISSION:



Alison Lackey

Chief Administrative Law Judge



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

ITEM NO. RA2

**PUBLIC UTILITY COMMISSION OF OREGON
STAFF REPORT
SPECIAL PUBLIC MEETING DATE: June 25, 2026**

REGULAR	X	CONSENT	EFFECTIVE DATE	Upon Commission Approval
	<u> </u>	<u> </u>		<u> </u>

DATE: June 10, 2026**TO:** Public Utility Commission**FROM:** Heide Caswell**THROUGH:** Nolan Moser **SIGNED**

SUBJECT: PORTLAND GENERAL ELECTRIC:
(Docket No. UM 2208)
Portland General Electric's 2026-2028 Multi-year Wildfire Mitigation Plan.

STAFF RECOMMENDATION:

Approve Portland General Electric's 2026-2028 Multi-year Wildfire Mitigation Plan and adopt Staff recommendations for additional improvement.

DISCUSSION:Issue

Whether the Oregon Public Utility Commission (Commission) should approve Portland General Electric's (PGE or Company) 2026-2028 Multi-year Wildfire Mitigation Plan (MYP). Whether the Commission should direct PGE to take the actions recommended by Staff.

Applicable Rule or Law

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

Senate Bill (SB) 762 (2021), incorporated as ORS 757.960 through ORS 757.969, established standards for electric utility's Wildfire Mitigation Plans and required the

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Commission to promulgate rules related to the requirements of the Plans. Pursuant to ORS 757.963 the Commission may “approve with conditions” a public utility’s Wildfire Mitigation Plan or update.

Oregon Administrative Rules (OAR), in 860-300, articulate the minimum requirements for the plan fillings as well as the process for Commission approval of the plans. Further, In Order No. 24-326¹, the Commission adopted guidelines for wildfire mitigation plans.

The Commission approved the PGE 2025 WMP in Order No. 25-234² and directed the Company to work with Staff to implement Staff’s recommendations for future plans.

Analysis

Background

Portland General Electric’s 2026-2028 Multi-year Wildfire Mitigation Plan represents the fifth year of wildfire mitigation planning under Oregon statute. Staff recognizes that requirements will continue to evolve as mitigation strategies, risk analysis, cost-benefit assessment tools, and related programs mature. Emerging technologies and advances in fire science also create opportunities to collaboratively improve wildfire-mitigation programs, helping ensure that customers, regulators, utilities, and other stakeholders understand each utility’s current practices and progress. These developments, combined with continued co-creation, can support cost-effective resilience investments that strengthen the electric system while balancing customer cost impacts. Changes in wildfire mitigation plans have largely been adopted through Docket No. UM 2340. This report presents Staff’s recommendations for PGE’s 2026-2028 Multi-year Wildfire Mitigation Plan and identifies additional information for inclusion in the 2027 Plan Update, to be filed by December 31, 2026.

Staff recognizes the extensive effort required to produce a WMP. PGE’s first multi-year plan offered a detailed view of the Company’s wildfire planning practices utilizing the Shared Format adopted in UM 2340.³ This format improved the readability across the investor-owned utilities’ (IOUs) plans. Staff values the IOUs’ continued collaboration in this evolving process, their openness in discussing their Plans, and their ongoing commitment to mitigating utility wildfire risks.

¹ Order No. 24-326, <https://apps.puc.state.or.us/orders/2024ords/24-326.pdf>.

² Order No. 25-234, <https://apps.puc.state.or.us/orders/2025ords/25-234.pdf>.

³ Order No. 24-326, <https://apps.puc.state.or.us/orders/2024ords/24-326.pdf>.

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Process

On December 31, 2025, Portland General Electric filed its 2026-2028 Multi-year Wildfire Mitigation Plan with the Commission, and concurrently submitted the 2025 Risk Spend Efficiency (RSE) Workbook⁴ and the 2025 Initial WMP Data Template Workbook, containing data through the third quarter of 2025 and forecasts through 2028. On March 5, 2026, IOUs presented their 2026-2028 Multi-year Mitigation Plans during a Special Public Meeting.⁵ On March 31, 2026, PGE provided its Final 2025 WMP Data Template Workbook, which included updated the Initial 2025 WMP Data Template Workbook and fourth-quarter 2025 results.

Review Method

Staff's analysis evaluates the Company's compliance with minimum requirements primarily in Division 300. The findings and recommendations in this memo are based on Staff's review of the Company's MYP, Data Templates, RSE Workbook, the Independent Evaluator's (IE) Report, and stakeholder comments. Staff additionally considered information obtained through WMP workshops, structured stakeholder engagement, and consultation with subject matter experts to evaluate the Company's alignment with current industry standards and practices.

Climate Wildfire and Energy Strategies, LLC (CWE) served as the IE for the 2026-2028 WMP filings, providing analytical support and written reports.⁶ For the 2026 WMP submissions, the IE continued using the previously established compliance metrics of "Met", "Partially Met", and "Not Met" to determine OAR compliance and recommendation completion. Staff uses "Met" and "Not Met" for OAR compliance and "Met", "Partially Met", and "Not Met" for areas of additional improvement. Staff appreciates the valuable work and perspective that the IE contributes to the WMP review process. Staff ultimately chose to incorporate some, but not all, of the IE's recommendations into its final recommendations for PGE.

Staff groups its recommendations for the MYP into two categories: (1) recommendations applicable to all Investor-Owned Utilities, denoted with "ALL", and (2) recommendations specific to Portland General Electric, denoted with "PGE". Introduced this year are two additional components regarding completion timeframes. Each recommendation is assigned a completion timeframe. Recommendations denoted with a "U" identify near-term improvements to be addressed in the next MYP Update, and

⁴ The 2025 Data Template Workbook and 2025 RSE Workbook supports the IOUs 2026-2028 MYP.

⁵ Recording of March 5, 2026, WMP Special Public Meeting, https://oregonpuc.granicus.com/player/clip/1621?view_id=2&redirect=true.

⁶ The IE is not responsible for assessing each IOU's risk assessment approach but identifying that the IOU has explained its overall modeling processes.

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recommendations denoted with “B” identify longer-term improvements to be implemented in the next Multi-year Plan, due by December 31, 2028.⁷

Several recommendations will require joint effort between Staff and the IOUs as part of the WMP evolution process under UM 2340. Staff’s objective is to evaluate current IOU processes and deliver clear, actionable guidance for incorporation of its recommendations into the reporting structure adopted in UM 2340.

Incorporation of 2024 and 2025 Recommendations for Additional Improvement

In Order Nos. 24-232⁸ and 25-234,⁹ the Commission adopted Staff Recommendations as areas of additional improvement for PGE. The IE and Staff assessments summarized in Table 1 reflect the Company’s responses to prior feedback. Staff recognizes that the IOUs continue to evolve the content contained in their wildfire mitigation plans, as well as complementary materials that inform customers about wildfire mitigation more broadly. As a result, certain of the recommendations, while not fully complete, have shown demonstrable progress and warrant evaluation in the future to determine how much advancement is appropriate. As a result, Staff suggests that the following recommendations be considered materially complete at this time, ALL_M, ALL_N, ALL_O, ALL_P, ALL_2505, ALL_2506, All_2513, and All_2514. Appendix B consolidates and tracks outstanding recommendations and lists Staff’s current recommendations for PGE’s Areas for Additional Improvement.

⁷ Staff recommends the continued adoption of a numbering approach. PGE specific recommendations will begin with ‘PGE’ while joint IOU recommendations will begin with ‘ALL’. Additionally, each recommendation will reflect the recommended year ‘26’ followed by a distinct ID number as was similarly done in 2025. A timeframe component will now be added to each recommendation, ‘U’ denotes the recommendation be addressed in the next Updated to the current MYP (in this case 2027) and ‘B’ denoted the recommendation be addressed in the next MYP in 2029, designating it as a base multi-year plan.

⁸ <https://apps.puc.state.or.us/orders/2024ords/24-232.pdf>.

⁹ <https://apps.puc.state.or.us/orders/2025ords/25-234.pdf>.

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Table 1: Areas for Additional Improvement

OPUC Order #	Description	IE Conclusion: Met/Partially Met/Did Not Meet/Not Due	Staff Conclusion: Met/Partially Met/Did Not Meet/Not Due
Order No. 24-232¹⁰			
PGE_1	Risk Modeling Aspects	Met	Met
PGE_4	Risk Ranking	Met	Partially Met
PGE_7	Feedback on Outreach and Engagement	Met	Met
PGE_19	Vegetation Management Effective	Met	Met
PGE_21	Advancing Technology	Partially Met	Met
PGE_24	Ignition Inspection	Met	Met
ALL_A	Meet Report Compliance	Met	Met
ALL_C	Shared Glossary	Met	Met
ALL_D	Standard Format	Met	Met
ALL_H	Industry Engagement Information	Met	Met
ALL_I	Pilot Technology Information	Partially Met	Met
ALL_J	Risk Map Working Group	Met	Met
ALL_K	Calibrate Risk Modeling Methods	Met	Met
ALL_L	RSE Methodology	Met	Met
ALL_M	Reliability Best Practices	-	Met
ALL_N	Public Safety Partner Engagement	-	Met
ALL_O	Consistent Outreach & Education	-	Met
ALL_P	PSPS Reporting	-	Met
Order No. 25-234			
PGE_2501	Outage Data Quality	Met	Met
ALL_2501	WMP Update Templates	Not Due Until 2027	Not Due – Complete for 2027

¹⁰ Orders identified as 2026 or Phase 2.

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OPUC Order #	Description	IE Conclusion: Met/Partially Met/Did Not Meet/Not Due	Staff Conclusion: Met/Partially Met/Did Not Meet/Not Due
ALL_2502	IWRMC Maturity model Results	Did Not meet	Partially Met
ALL_2503	2025 Data Submissions	Met	Met
ALL_2504	Outage Data/Ignition Risk Drivers	Met	Met
ALL_2505	Analysis of Outage Causes	-	Met
ALL_2506	Utility Risk Areas	-	Met
ALL_2507	Planned Mitigation Investments	Met	Partially Met
ALL_2508	Grant Information	Met	Met
ALL_2509	Changes in Work Completed	Met	Met
ALL_2510	Equipment Upgrades	Met	Met
ALL_2511	Survey Details and Analysis	Partially Met	Partially Met
ALL_2512	Real-time Emergency Communication	Met	Met
ALL_2513	Inspection Programs Coordination	-	Met
ALL_2514	Industry Engagement Activities	-	Met

Stakeholder Comments on PGE's MYP

Staff values the perspectives offered through stakeholder comments and appreciates the time and effort invested in providing them. Based upon feedback received from stakeholders, Staff adjusted the schedule to allow for more preparation time and additional opportunities for input. Staff reviewed comments submitted by Joint Advocates¹¹ and The Alliance of Western Energy Consumers (AWEC).

This year, the stakeholder comments focused on several key themes: readability, risk spend efficiency, capital investments, vegetation management, situational awareness, public safety, and diversified outreach, including partnerships. Attachment A provides a summary of comments received in the UM 2208 docket. Where applicable, Staff incorporated some, but not all, of the stakeholders' recommendations. Where

¹¹ Joint Advocates are NW Energy Coalition, Community Energy Project, and Oregon Citizens' Utility Board.

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stakeholder recommendations were not incorporated, Staff intends to work jointly with advocates and IOUs to further consider how to advance many of the concepts that were shared.

Staff Findings of PGE's 2026-2028 Multi-year Wildfire Mitigation Plan

In Staff's review of PGE's MYP, it observed PGE's plan includes a proposed investment of \$383 M over the next three years. The result will likely be upward pressure on customer rates. Staff takes this opportunity to underscore the importance of utility spending discipline and cost containment, with an eye towards affordability given recent rate increases. The awareness of these substantial impacts leads Staff to question whether PGE has ensured it has properly harmonized its wildfire actions with other operational actions to manage costs and maximize benefits for customers. Certain actions raise concern for Staff, including deployment of activities which are generally conducted across the Company and not constrained to the HFRZ, initiatives that seem to generally benefit non-wildfire processes, and repetitive modeling of fire risk areas (yielding significant changes in HFRZ-designation).

Generally, Staff supports ongoing assessment of fire risk area designations, however, Staff remains concerned about the durability of the designation in light of the substantial costs for the long-term mitigation investments. Staff believes strongly that models must be developed in a way that supports the prudence of large, long-term mitigation investments. These investments should be directed toward areas of significant and persistent risk, where boundaries are unlikely to shift. Staff also supports the development of shorter-range risk modeling which can help designate areas for sensitive settings or other operational measures that can reduce risk when particular conditions are anticipated. Done properly, this information could be used with the nascent RSE workbook to demonstrate the valuation approach taken for the possible mitigations.

Additionally, while Staff recognizes that ignition risk and fire spread can occur outside designated HFRZ areas, Staff believes it is critical that utilities provide clear, evidence-based justification, and precise wildfire risk reductions for each proposed program or mitigation. This includes supplying the underlying data, calculations, analytical processes, and specific results used to demonstrate a program's effectiveness. Such transparency is essential to show cost discipline and to support future cost-recovery requests.

After reviewing PGE's comments on Staff's Draft Recommendation, Staff clarified recommendations to ensure that accuracy on risk assessments are prioritized to provide assurance to Staff, Advocates, and Rate-payers that investments are properly targeted. Staff understands the Company's concerns regarding the timing of certain requirements

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and the adjustments to the 2026–2028 MYP; however, these revisions reflect an effort to balance Staff and Advocate concerns related to cohesiveness, readability, and redundancy. Staff plans to work jointly with the IOUs and Advocates prior to the next MYP to better organize the reports for varied audiences, while ensuring the report meets regulatory expectations for completeness and transparency.

Staff Recommendations:

ALL_2601U: Staff recognizes that the WMP template¹² provides the structure for MYPs and Updates, however recommends Staff, IOUs, and stakeholders develop guidelines for content that is appropriately contained in an Update and how best to make this information useful for a variety of readers. At minimum, Staff believes Updates need to include: 1) items that summarize the year's deliverables (actuals versus plans, units, and costs); 2) any modeling or refinement in analysis that either results in a change in designated risk or mitigation approach; 3) explanations of actions taken and progress made in response to recommendations that were approved by the Commission, even if not completely fulfilled at the time of Update filing; and 4) thresholds for significant Initiative updates as defined in UM 2340 Order No. 24-236 Appendix A Section 3.4. Staff proposes that a workshop with the utilities, Joint Advocates, and other stakeholders could be an ideal venue for discussion and alignment to occur and suggests it be held during late summer.

ALL_2602U: Recognizing that IOUs are developing explicit evidence supporting how and why they have chosen a particular wildfire mitigation initiative activity, in the interim (if there is not yet detailed data or analysis underlying the activity) they should identify the fundamental principle of the activity (for example reducing probability of risk event, ignition risk, consequence, impact or enhancing awareness, responsiveness, etc.) as well as the key assumptions made to support that strategy, in addition to identifying the intended metrics that will be used to demonstrate the effectiveness of the approach (such as reducing certain types of outages, shortening the duration of fault current, etc.).

ALL_2603B: By the next MYP, the utilities should augment explanations from ALL_2602U with data, calculations, analysis methods, and measurable results—demonstrating the effectiveness of their wildfire mitigation program's initiative activities. In their WMP Reports, IOUs should outline any analysis performed, including whether the initiative activity succeeded or fell short, the lessons learned, and the reasons for any program expansions, reductions, or redesigns. IOUs should also clearly identify the cost impacts associated with these

¹² <https://apps.puc.state.or.us/orders/2025ords/25-326.pdf>.

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outcomes. This information should be included in the appropriate WMP report initiative subsection's initiative activity section that details the program which can be included in the framework or mitigation explanations. If providing effectiveness for an overall section, evidence can be included in results or continuous improvement subsections. This requirement applies to all major wildfire mitigation programs, including inspection and vegetation management, grid hardening, operational protocols, community outreach, risk assessment methodologies, emergency preparedness, and situational forecasting. Examples include, but are not limited to:

- Idaho Power's use of a 20 ft vegetation clearance radius for distribution circuits.
- PGE's rationale for a two-person crew for inspection with an unknown quantity of corrections performed simultaneously.
- PGE's assessment of optimal clearance distance as discussed in VM 07.
- Pacific Power's choice of 100 percent quality assurance inspection on all grid hardening projects through post construction inspections.

ALL_2604U: Staff appreciates feedback supplied by the utilities relating to allocation and in an effort to be clear about costs specific to new WMP efforts, IOUs should provide initiative activity costs within each initiative category in the initiative summary tables (with subtotal) as well as those costs attributed to general or embedded programs (with subtotal). In addition, where the program is generally beneficial to other utility processes, Staff and the IOUs will work to detail within the data template workbook how to present that information. Finally, in cases where multistate allocation results in portions of the costs attributed to Oregon customers, Staff will work with the IOUs to clarify what amount the utility proposes to allocate to them. Where costs are grouped across initiative activities the IOU should estimate the percentage of the cost attributed to each initiative activity until cost singularity exists for the activity. IOUs should work with Staff to structure the submittals to fully describe the methods for cost estimation and outline the basis for the benefits being attributed to the measure.

ALL_2605U: Staff appreciates the utilities' response regarding the pilot template feedback. Staff also recognizes that the IOUs have identified certain programs as pilots. However, Staff asserts that a pilot template¹³, including substantial explanation is required whenever the IOU performs any new activity that has risk reduction benefits or that has short or long-term cost implications. While the IOUs identified certain initiative activities as pilots there are a large number of initiative

¹³ Pilot templates were developed and ordered in Order No. 25-326 Appendix A, page 42 of 70.

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activities that have had no explanation for their existence within the wildfire mitigation program (and relate to new spending or should result in risk reduction). This results in commitment of resources to an action which have never had the rationale fully understood by Staff or stakeholders. Such has been the case with the creation and expansion of weather and camera networks, as well as Pacific Power's substantial expansion of its meteorology, emergency management and most recently wildfire intelligence center. This has resulted in significant costs that were not "piloted", have never been cost-justified and were not compared against other measures to determine their priority as a mitigation measure. In addition to being more expansive in providing information regarding tooling up mitigation measures, IOUs should expand upon the new and additional resources as potential pilots as a means to measure and assess the value provided by these investments. IOUs should include details, where applicable, of the deployment locations/'Application' for pilot technologies and why the given area was chosen. When explaining the reasons for further investment, IOUs should provide more complete project management elements, including key goals, deliverables and milestones the Company intends to assess to measure the merits of the activity.

Plan Compliance Review and Recommendations for Future Plans by Section

OAR 860-300-0020 (1)(a)(A) & (B):

Identified areas that are subject to a heightened risk of wildfire, including determinations for such conclusions, and are:

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

Staff Analysis:

PGE met the requirements for identifying High Fire Risk Zones (HFRZ) within its service territory and associated generation and transmission asset locations. The MYP provided updated analysis which generated revised HFRZ boundaries where assets currently exist as well as risk associated within the expanse of the service territory which may not currently include electrical services. The IE recommends PGE evaluate its calibration of wildfire risk scoring methodology and review the classifications of smaller Elevated Fire Risk Zone (EFRZ) into HFRZs or non-HFRZ areas. This element will become more important as increased sectionalization and localized hardening takes place, resulting in reduced utility ignition risk but rendering small, scattered pockets of service territory still vulnerable to other ignition sources.

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Staff appreciates the Company's depth, rigor, and thoughtfulness applied in its analysis of the various factors that may contribute to potential ignition events. However, Staff observes that the analysis at times may incorporate an excessive number of overlapping variables, company-specific qualitative weightings, and unmeasured multipliers, which may confuse the primary driver for a given ranking or decision and can sway the model outputs inexplicably.

Staff suggests that the Company streamline and simplify its modeling calculation for each ignition-risk component used in its Total Wildfire Risk and Value Spend Efficiency (RSE) calculations. The Company should remove, minimize, or provide science-based justification for multipliers, coefficients, or other qualitative measurements applied within these models. Doing so will help ensure that the analysis remains focused, transparent, and actionable while still benefiting from the Company's expanded analytical capabilities. Staff also suggests that where possible, PGE utilize the joint IOU and Staff Wildfire Mitigation Plan Shared Terminology within its WMP filings.

Staff Recommendations:

ALL_2606B: IOUs should identify key assumptions associated with risk quantification and test them, performing sensitivity analysis to establish resulting risk and consequences, explaining the modeling variability based on these changes. In cases where the utility uses a vendor product to model risk, they should develop processes that can be conducted to evaluate the model's sensitivity to variations of key attributes. In cases where the IOU has internally developed its model Staff requests models be evaluated by an independent authority. In all cases, explanations regarding the rationale for the performed sensitivity analysis, and the tested variables should be provided. Utilities shall explicitly indicate which models and analysis are internally developed, vendor provided or contracted. Examples include:

- Weather and climate change scenarios and the basis for the choice, including wind speeds and directions, ambient temperature, and application within the gridded environment.
- Climate inputs, including long- and short-term drying patterns leading to, at minimum, fuel moisture metrics.
- Fuel characteristics and granularity of any gridded cells.
- Detection timing, if part of the consequence modeling (whether detection responsiveness, impact estimation, assumed burn period, etc.).
- Ignition probability (established to identify service territory HFRZ).
- Ignition spread under the given conditions, including identification of the spread-modeling algorithm or source.
- Spread consequences, including injuries, structures, timber loss, or other quantifiable losses and the sources considered and used.

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- Burn period, and explanation for the choice given each scenario considered.
- Each subjective measure introduced into the calculation process, including detection assumptions based on population, distance to fire protection resource, coverage by camera viewsheds, etc.
- Each multiplier used within the calculation process that is not directly attributed to a specific algorithm (i.e., calibration of burned area based upon comparison to a specific event chosen by the utility).
- When appropriate, utility equipment ignition probability to estimate utility wildfire consequences.
- And other assumptions used to arrive at probability, risk, impact, or consequences of wildfire.

ALL_2607U: Identified in an Appendix D of the WMP Report, the IOUs should provide:

1. Maps that show current and historically-identified areas designated as HFRZ or Areas of Interest from the first risk model and
2. When the HFRZ or Areas of Interest are modified, identify information relating to any changes comparing the current against the most recently-approved WMP HFRZs or Areas of Interest including:
 - A narrative description of why the boundary was adjusted, added, or removed, including the conditions that have changed and how the modification aligns with current wildfire risk.
 - The datasets, risk models, geospatial layers, climate projections, vegetation assessments, ignition probability analysis, or subject matter expertise were used to support the change, including a description of analytical methods, thresholds, weighting factors, and any expert judgment, including any sensitivity analysis or assessments used to ratify the revision.
 - A table showing asset types and customers affected by the change categorizing as added, removed, and unchanged for each Area of Interest, HFRZ or non-HFRZ.

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

Identified means of mitigating wildfire risk that reflects a reasonable balancing of mitigation costs with the resulting reduction of wildfire risk.

Staff Analysis:

PGE met the requirements to outline how it uses relevant data to inform its prioritization process for mitigation measures. The IE recommends that PGE should incorporate

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climate change effects into the underlying inputs of its risk model and when estimating value of service, the company should explain its use and assumption of inputs.

Staff acknowledges PGE's work in evolving its Risk and Value Spend Efficiency (RSE/VSE) models. As noted in OAR 860-300-0020 (1)(a)(A) & (B) Staff and the IE have concerns with a lack of science-based justification for the multipliers, coefficients, and fire history used to produce the RSE/VSE calculations. As such it is difficult for Staff to utilize PGEs RSE/VSE results to judge its investments. Staff would also find it valuable to understand the various processes as well as other methods the Company has used to estimate values that support the RSE/VSE. Having a well-tested model for assessing risk is essential, as it directly informs mitigation investment decisions. For this reason, Staff believes it is critical that each IOU work with a third-party expert to evaluate its internal risk and consequence modeling. Independent review will help ensure that the models are robust, transparent, and capable of supporting prudent long-term investment decisions (see ALL_2606B).

Staff Recommendations:

ALL_2608U: Staff recommends that IOUs provide, in an Appendix to the WMP Reports, comprehensive documentation of all historical fire data used as part of the consequence modeling processes. At a minimum, IOUs should include:

- Criteria used to identify relevant fire events.
- All historical fire events included in the analysis, along with the basis for its selection.
- Relevant event details, such as injuries, fatalities, damaged or destroyed structures, acres burned, timber board feet lost, suppression, and any other quantifiable impacts used to inform consequence scoring and/or specific delineated costs.
- What adjustments, normalizations, and associated datasets are integrated into the consequence model, such as weighting factors, scaling methods, final affected areas impacted, or statistical techniques.
- Any limitations or uncertainties associated with the historical dataset and how those limitations influenced the results.
- Datasets used to evaluate affected populations, structures, and other associated measured effects of the fire consequence location.

PGE_2601U: PGE and OPUC Staff should work together to develop methods for evaluating reliability impacts (co-benefits) related to mitigation measures considered. PGE should then compare these results against its earlier results produced using their assumptions (as well as detailing each assumption), in addition to producing the results without modification of the 2012 PGE VOS study.

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

Identified preventative actions and programs that the utility will carry out to minimize the risk of the utility's facilities causing wildfire.

Staff Analysis:

In its MYP, PGE provides insight into the progression it has made to expand and identify the various mitigation approaches it is currently utilizing to address ignition risk, which Staff judges meets the OAR. Nonetheless, Staff believes further discussion of specific conditions and criteria the company uses and the key considerations regarding particular risk drivers and duration and cost of effectiveness play in mitigation selection would be beneficial.

Staff Recommendations:

ALL_2609U: IOUs should outline in a table the options for mitigation approaches versus risk event drivers and generally describe criteria that would influence the choice, resulting in a preferred mitigation. For example, outage history that indicates vegetation contacts might result in either vegetation management, covered conductor or undergrounding as options. However, additional considerations may result in a preference toward one of them.

ALL_2610U: The IOUs should clearly explain how they determine whether to proceed with or suspend completion of projects that are no longer identified as priorities (due to limited risk reduction or due to reductions in utility ignition consequence) as their understanding of risk and mitigation selections evolves, with an eye toward maximizing risk reduction while avoiding stranded or underutilized investments. As part of this process, IOUs should review all planned or targeted mitigations to determine priorities based upon:
1) modifications to the risk areas; 2) changes in sustained zone of protection risk scores; or 3) new mitigation measures and their impact on reducing risk. Specifically, each utility should identify its approach to establishing "off ramps" for any programs when it determines there may be higher value approaches to reducing wildfire risk.

OAR 860-300-0020 (1)(d) and OAR 860-300-0070:

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

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860-300-0070 (1) The Public Utility is required to file annual reports on de-energization lessons learned, providing a narrative description of all PSPS events which occurred during the fire season. Reports must be filed no later than December 31st of each year. (2) Non-confidential versions of the reports required under this section must also be made available on the Public Utility's website.

Staff Analysis:

PGE met the requirements of the regulation for outreach to communities, as well as public safety partners, regarding Public Safety Power Shutoff (PSPS), including providing information regarding situational awareness and further communication about the impact of sensitive settings. In its MYP, PGE outlines their participation with community-based organizations, wildfire event partnerships, and community outreach events. Staff would like PGE to provide clear information regarding the process it takes to ensure that vulnerable or critical customers are notified of system changes, including when sensitive settings are in place or during a PSPS event, including how it coordinates with public safety partners relating to verification that vulnerable or critical customers are supported during these periods.

Staff Recommendations:

ALL_2611U: The IOUs should outline how they ensure positive PSPS notification confirmation occurs for critical customers, including individuals identified as medically vulnerable and how the Company works with public safety partners if they are unable to communicate with an affected customer. Also, the IOUs should outline their methods of informing customers and communities (particularly critical and medically vulnerable customers) when sensitive settings are enabled.

Additionally, in their annual PSPS filings, pursuant to OAR 860-300-0070, IOUs should work with advocates, partners and Staff to enhance these reports to include details relating to:

- Methods to communicate with customers regarding sensitive settings and IOU attempts to mitigate reliability impacts to the customers and communities experiencing them;
- PSP outreach and coordination, including partner engagement, cadence of outreach, and how feedback received from these partners has influenced the IOU's program;
- CBO outreach and coordination, including communication content shared through the CBO;
- Tabletops, functional exercises or PSPSs conducted within their service territories; and

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- After-action reviews for each tabletop, functional exercise or PSPS performed and how that feedback has changed processes within the IOU.

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

Identified protocol for the de-energization of power lines and adjusting of power system operation to mitigate wildfires, promote the safety of the public and first responders, and preserve health and communication infrastructure.

Staff Analysis:

PGE met the requirements outlining PSPS protocols in alignment with the regulations. The Company clearly outlines its goals, communication timelines and partnerships it plans to invoke should a PSPS event occur. Additionally, the company has included in its MYP its goal to continue to expand and strengthen its protocols around line de-energizations. As noted previously, Staff would like PGE to provide clear information regarding the process it takes to ensure that vulnerable and critical customers are notified of system changes, including sensitive settings or during a PSPS event as referenced in ALL_2613U.

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

Identification of the community outreach and public awareness efforts that the utility will use before, during, and after a wildfire season.

Staff Analysis:

PGE met regulatory requirements outlining methods for community outreach. PGE provided several details within its MYP which outlined the number of community events it either held or attended in 2026. Staff and Advocates believe further information would be helpful and therefore Staff suggests the following.

Staff Recommendations:

ALL_2612B: IOUs shall improve transparency by responding to stakeholder feedback and surveys on their Wildfire Mitigation Plan (WMP) and related processes. Survey questions and responses should be included in WMP Report Appendix F using charts or graphics to demonstrate the feedback received.

Additionally, IOUs should include the following:

- IOUs should identify appropriate demographic cohorts, including language proficiency level (within their service territory), public safety partners (PSPs), community communicators (e.g., churches, schools), critical customers, medically vulnerable customers, and customers with access and functional needs, to better understand feedback from each group.
- IOUs should identify specific updates, completed or planned, to their notification and coordination programs based on survey results and

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feedback from critical customers and PSPs, including implementation timelines.

- Due to Idaho Power's low customer feedback for its Oregon customers, Staff recommends Idaho Power develop proxy methods to establish ways to gauge how best to support Oregon customers.

ALL_2613U: Staff recommends that IOUs continue developing tailored messaging and other resources to support communication with distinct customer groups and expand their multilingual outreach efforts.

- The IOUs should analyze and report on the non-English languages spoken within their Oregon service territory, which could be based upon data such as that available through the ACS.
- Based upon these findings, the IOUs should provide recommendations regarding their plans to produce deliverables with timelines. Alternatively, the utility should explain, based on its research supported by verifiable data, why educational materials in additional languages are not necessary.
- Staff recommends that Idaho Power continue developing tailored messaging focused initially on Spanish language resources, including providing detailed deliverables with explicit timelines.

ALL_2614B: Staff recommends that IOUs expand the availability of third-party, industry-recognized wildfire-safety resources across their customer-facing platforms. IOUs should provide references to these materials on their websites, social media channels, and at community and wildfire-preparedness events, and should offer them in multiple languages where applicable. These resources should include, but not be limited to, information on home hardening, defensible space, community preparedness programs, and current fire-location and situational-awareness tools. In addition, at events that IOUs coordinate, they should provide opportunities for community partners to inform attendees about matters beyond utility wildfire risk, including such partners as OSFM and IBHS to provide information to homeowners about strategies they can use to improve their resilience to any wildfire event. IOUs may consider working jointing to develop these resources and strategies.

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

Description of procedures, standards, and time frames that the Public Utility will use to inspect utility infrastructure in areas the Public Utility identified as heightened risk of wildfire.

Staff Analysis:

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PGE met the requirements for inspection and correction, including outlining its inspection approaches. Staff continues to seek clearer, data-driven justification for the frequency and timing of inspections, the cost and implementation timelines for new technologies, and the mechanisms that ensure prompt corrective actions while controlling program costs. Staff seeks a transparent plan that explains how the Company will integrate LiDAR, high resolution aerial imagery, the use of drones and early fault detection into current inspection and maintenance workflows in a cost-efficient manner. These could include a phased adoption approach, demonstrating how new capabilities will replace or augment existing activities to avoid duplication, and clearly delineate incremental tasks and expenses that are directly attributable to wildfire mitigation versus those that support general system reliability and are not attributed to WMP funding. Deliverables should include pilot results, cost and performance metrics, and a cost allocation methodology that stakeholders can review.

Staff Recommendations:

ALL_2615B: IOUs should clearly describe the different inspection types and deployment locations within their inspect/correct and vegetation programs as they relate to mitigating wildfire risks in HFRZs. To the extent these programs exceed relevant regulations, IOUs should identify the rationale, detail the historic discovery of inspection conditions, their correction timeframes and their correlation to ignition risk events or risk event drivers. For inspect/correct and vegetation programs the utilities must identify the basis for optimal QA/QC, consistent with ALL-2618U, and the Company's underlying economic goals and results. Lastly, IOUs should explicitly identify the funding mechanism used to support these efforts, whether general rates, WMP AAC, or other cost recovery method.

ALL_2616B: As IOUs evaluate and consider line-monitoring and various asset/vegetation inspection technologies, they should provide clear data demonstrating the benefits of these technological advancements, including how the results guide program evolution and support the rationale for any location-specific deployment. This should include providing technology or practice details that clearly and completely identify what the general objective of the technology is, what criteria were used to optimize its deployment, as well as outlining where, why and when locations were chosen and how they are recorded into the IOUs records for future effectiveness analysis. The utility should further explain how these tools reduce wildfire risk, improve cost-effectiveness, their impact to standard operational work, and how the tool will either replace, modify, or complement existing programs.

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ALL_2617U: IOUs shall include in their WMP reports quality assurance or quality control programs for the following WMP initiative activities: inspect/correct, vegetation management, and reconductoring programs. These programs should identify both the quality control requirements (where the work is being done by the utility) as well as the quality assurance requirements (where the work is being done by an agent). These programs should recognize both the delivered product being completed at a location, and outline program requirements including:

- Identified sample size and the rationale for that size.
- Pass rate percentages, considering environments, which could include HFRZ, rural, or urban environments, and the rationale to support the rate and its application to the environment, and the expected confidence interval.
- Procedures used to adjust sampling processes based on historic performance, i.e., tightened or loosened sampling.

The initiative quality assurance or control plan should also outline how record keeping, including mapping, is being quality controlled. It should identify the details of the work being done with locational precision, detailed accuracy, and completeness for the record produced, including, where appropriate, its existence within corporate databases, including GIS.

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

Description of the procedures, standards, and timeframes that the utility will use to carry out vegetation management in areas it has identified as heightened risk of wildfire.

Staff Analysis:

PGE met the requirements for outlining its approach to vegetation management. Staff continues to have concerns around the significant cost for relatively few line miles, as well as costs per line mile compared to other utilities. Staff remains interested in the data and findings that drive the frequency of inspections, particularly those resulting in multiple performed within a single year.

Staff Recommendations:

Staff recommends these issues are addressed in ALL_2615B through ALL_2617U.

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

Identification of the development, implementation, and administrative costs for the plan, which includes discussion of risk-based cost and benefit analysis, including consideration of technologies that offer co-benefits to the utility's system.

Staff Analysis:

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PGE met the requirement of this rule by providing a description of costs as well as tables that show estimated versus forecast costs. While co-benefits are mentioned throughout PGEs MYP, there is still opportunity for further engagement and development around this topic. While a standardized co-benefit integration into the WMPs has not yet been made, Staff anticipates continued progress on this topic will be made through joint IOU and Staff efforts in future WMP evolution.

PGE's advancement of its WMP identifies some significant costs based on new IT software designed to integrate data from several systems and internal organizations. It is unclear to Staff how the Company is allocating these implementation costs between wildfire mitigations plans versus other areas of the business which will benefit, which implicates how substantial the specific wildfire mitigations benefits provided.

Overall, Staff request greater transparency including detailing the underlying data, analyses, and sensitivity modeling that informs cost estimates and decision making.

Staff Recommendations:

Staff is recommending these issues are addressed in ALL_2604U.

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

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

Staff Analysis:

PGE met the requirement of this rule by explaining its engagement in industry collaboration. Staff appreciates PGEs commitment to expand and further its processes to identify areas for focused work and the selection of mitigation approaches. As mentioned previously, Staff has some concerns with the specific risk modeling and calculations being performed and anticipates that the Company will provide details in response to recommendations identified previously. As with all IOUs, Staff expects the information gained from the various wildfire forums and workshops to be clearly vetted with third party verification and/or an in-depth assessment of any results be evaluated prior to any implementation or investment, consistent with ALL_2603B and ALL_2606B.

Staff Recommendations:

ALL_2618B: IOUs should expand their consideration for collaboration and partnership, such as described in stakeholder comments, incorporating strategies

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with other wildfire-resilience organizations. Staff recommends the following inclusions as a tabled appendix within the WMP report updates:

- The partner organization.
- The objective of the joint partnership.
- The utility role in the partnership.
- How responsibilities are set and coordinated.
- Which initiative activity is the partnership supporting.
- How the partnership maximizes wildfire-resilience community benefit while minimizing customer cost.
- How costs and benefits are shared.
- How soon will the impact of the partnership be achieved, including any deliverables or milestones planned.
- Whether contributions are financial, technical, in-kind, or employee time.
- Resource participation by the partners, including any grants received from them.
- The utility, organization, or other actor that provided the example being leveraged.

As an example, Idaho Power describes how it collaborates with the All-Lands Partnership, which supports vegetation management across jurisdictional boundaries, while several of the consumer-owned utilities address partnerships they have found useful. Staff plans to jointly work with IOUs to further structure reporting in the Data Template Workbook and WMP Report Template with a partnerships/grants worksheet to create consistent IOUs' responses.

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

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

Staff Analysis:

PGE met the requirements for ignition inspection generally based on meeting administrative rules requiring asset inspection. Staff and the IE find that overall further expansion on these critical incidents will provide substantial benefits in understanding system risk and appropriate mitigation responses.

Staff Recommendations:

ALL_2619B: IOUs should provide a comprehensive outline of their current ignition and investigation tracking, including clearly demonstrating processes for detecting, recording, analyzing and reviewing ignition events as well as all data elements documented for each event (such as those required for FM 221 reporting). Additionally, the IOU should provide information regarding any

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detailed procedures for conducting root-cause analyses; and mechanisms for incorporating findings from past and present ignition investigations into ongoing wildfire-mitigation initiatives. Details for the program shall be included as part of the Risk Methodology and Assessment section of the WMP.

Data Templates

Staff Analysis:

PGE has demonstrated its commitment to the Data Template process by submitting an Initial Data Template on December 31, 2025, a revised Initial Data Template following Staff's completeness review and delivering its Final Data Template on March 31, 2026. While the Data Template provides Staff with an organized means to access WMP results and underlying drivers, it remains a work in progress and continues to evolve as requirements and data needs are refined. In addition to a workshop with advocates and IOUs to discuss various recommendations around the reporting structures and details Staff makes the following recommendation in addition to ALL_2621U.

Staff Recommendations:

Staff anticipates this work will continue through Docket No. UM 2340 and makes no additional recommendation in this docket.

RSE Workbook

Staff Analysis:

In addition to supplying Staff with its first RSE workbook on December 31, 2025, PGE also provided a revised version after Staff completion review. PGE also provided Staff with a version of the RSE workbook outlining the Company VSE/RSE values. Staff acknowledges the Company's provision of the RSE Workbook requested by Staff and the time and collaboration the Company contributed during the 2025 development process for the workbook's initial stage. Staff looks forward to the continued collaboration as we work to progress its development in future work, focusing on:

- Estimating ignition consequences using environmental and seasonal risk profiles regardless of ignition source while exploring point-of-ignition approaches.
- Quantifying impacts from measured inputs such as acres burned, structures lost, timber volume destroyed, and other ignition-relevant values.
- Estimating scenario probabilities.
- Modeling the impact for each given scenario.
- Aggregating probability and impact scenarios to calculate expected consequences.
- Improving risk quantification for circuit sustained zones of protection by applying aggregation methods to gridded values.
- Refining approaches for risk event drivers, including unplanned outages and ignition probabilities by outage cause or other event classifications.

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- Defining methods to estimate mitigation effectiveness using utility operational data and industry-standard data-collection practices.
- Expanding estimated costs for mitigation measures beyond Phase 1 of UM 2340.
- Reconciling multiple mitigation measures applied within a single sustained zone of protection.
- Evaluating approaches to address the volume of sustained zone of protection results and how best to transparently produce such information while managing technology barriers that could complicate viewing by staff, stakeholders, and customers.
- Reviewing key deliverables by an independent party.
- Jointly constructing the summary results from the RSE Workbook for inclusion in the WMP Report, detailing at a minimum circuit-segment (sustained zone of protection) scoring with relevant details, including score, prominent ignition risk drivers, mitigations considered, mitigations chosen, post-mitigation risk, and planned completion date.

Staff Recommendations:

Staff anticipates this work will continue through Docket No. UM 2340 and makes no additional recommendation in this docket.

Conclusion

Staff recommends approval of PGE's 2026-2028 Multi-year Wildfire Mitigation Plan and completion of previous Staff's recommendations for additional improvement. Staff submits its 2027 WMP recommendations, together with previously ordered recommendations, in Attachment B for incorporation into PGE's 2027 Update Plan.

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

PROPOSED COMMISSION MOTION:

Approve Portland General Electric's 2026-2028 Multi-year Wildfire Mitigation Plan and adopt Staff recommendations for additional improvement.

Stakeholder Comments in UM 2208
Attachment A

Stakeholder	Company	Topic	Stakeholder Recommendation	Staff Comments/ Applicable Recommendation
Joint Advocates ¹	IPC, PAC, PGE	Auditing	Auditing planning process (mitigation strategies and costs)	Staff looks to further their understanding of strategies and cost through the continued development of the RSE Workbook in conjunction with several recommendations throughout this report.
Joint Advocates	IPC, PAC, PGE	Modeling	Advocates recommend the Public Utility Commission consider auditing the companies' planning processes—or at a minimum utilities' wildfire mitigation strategies and costs—, consider re-evaluating the use of automatic adjustment clauses, and establishing structures and reporting that moves the needle on utility transparency and reasonable spending.	Staff request modeling transparency in recommendation ALL_2606B.
Joint Advocates	IPC, PAC, PGE	Approval Condition	Condition #1: Within 30 to 60 days of the Commission Order on these Wildfire Mitigation Plans, PGE, Idaho Power, and Pacific Power shall submit supplemental RSE filings that at a minimum address the six factors the IE identified that are necessary to justify wildfire mitigation investments (as well as any other factors the Commission believes are appropriate)—with evidence—and clearly explain why those strategies are the most cost-effective and risk-reducing solutions. We further request that no later than 60 days after the utilities file these reports, a third-party auditor review the supplemental filings and issue a report finding whether the utilities met the supplemental filing requirements, and accordingly issue recommendations for Commission action.	Staff appreciates Advocates' desire to better understand an IOUs decision around the mitigation strategies. Staff and IOUs are planning to further discuss the evolution of the RSE workbook in July. Additionally Staff has incorporated several recommendations within the report to gain greater transparency around decision driven cost-effectiveness.

¹ Joint Advocates (Advocates) are NW Energy Coalition, Community Energy Project, and Oregon Citizens' Utility Board.

Stakeholder	Company	Topic	Stakeholder Recommendation	Staff Comments/ Applicable Recommendation
Joint Advocates	IPC, PAC, PGE	Approval Condition	Condition #2: We request that the Commission hold a special public meeting to direct Staff to open a docket to investigate whether changes to the existing automatic adjustment clause cost recovery mechanism for wildfire mitigation costs are needed. Better understanding of how cost recovery and utility accountability are being ensured through the process.	AAC's were adopted with a provisional period and review of them is intended in a separate but related docket and WMP team members will support in the review process.
Joint Advocates	IPC, PAC, PGE	Increased Stakeholder Involvement	- A Staff Workshop to present findings and allow for further questions from stakeholders.	Staff is reviewing the possible development of joint workshops and hopes to hold specific workshops later this year to discuss the advancements in UM2340. Additionally, Staff would like to further explore the possibility of "office hours" to provide an avenue for communication with Stakeholders in the current development while providing a space to support questions or concerns throughout the year.
Joint Advocates	IPC, PAC, PGE	1. Readability, Format, and Reach of WMPs	Readability, Format, and Reach of WMPs: Balance details of the report for the various audiences. - limited report page numbers - Details within appendixes. - reduce redundancy combine mitigation measures and results.	Staff agrees with the advocate comments and plans to hold workshops to advance content and structure of Updates and Multi-year Plans.

Stakeholder	Company	Topic	Stakeholder Recommendation	Staff Comments/ Applicable Recommendation
Joint Advocates	IPC, PAC, PGE	2. The Risk-Spend Efficiency Tool: Consider interdisciplinary audiences	The Risk-Spend Efficiency Tool: Consider interdisciplinary audiences - Advocates strongly urge utilities and the OPUC to enhance the science communication of their RSE workbooks so that stakeholders and interested parties can more easily understand the IOUs' RSE metric score. Science communication refers to breaking down complex, technical topics and presenting the information in a coherent way that multiple audiences - from experts to members of the public - can understand and easily interpret.	See recommendation ALL_2621U.
Joint Advocates	IPC, PAC, PGE	5. Major advancements in Situational Awareness	Advocates recommend utilities and PUC Staff to take a deliberate approach to near-term and long-term data management planning, including establishing clear protocols for data retention, storage capacity planning, and criteria for secure deletion	See Staff recommendation ALL_2609U.
Joint Advocates	PAC	3. Grid Design and System Hardening: technology requires prudent investments	Grid Design and System Hardening: technology requires prudent investments - Concern with the 1.3 billion in investment - PAC's \$1.3 billion dollar investment into system hardening is a short-term solution to a long-term, more complex problem: continuing to invest billions of dollars into new infrastructure benefits the Company's asset portfolio - in order to boost their S & P credit rating - and does the bare minimum to make their infrastructure more resilient to uncharacteristic, large-scale wildfires. - We recommend that Staff provide PacifiCorp more detailed guidance and instructions for making significant grid design and system hardening upgrades, compared to other less capital-intensive strategies, and require PAC to clearly explain why its proposed wildfire mitigation strategies are the most cost-effective solution.	See Staff recommendation ALL_2610U (project tracking).

Stakeholder	Company	Topic	Stakeholder Recommendation	Staff Comments/ Applicable Recommendation
Joint Advocates	IPC, PAC, PGE	4. Monitoring Vegetation Programs by Gauging Forest Health	IOUs should look to smaller utilities, such as cooperatives or member-owned utilities, to enhance their wildfire mitigation plans. For example, Eugene Water and Electric Board and Consumer Powers provide concrete examples of engaging local communities and leveraging momentum built by previous wildfire mitigation initiatives funded through the Healthy Forest Restoration Act (2003), Community Wildfire Protection Plans (2003), the Collaborative Landscape Restoration Program (CFLRP, 2009), or the Wildfire Crisis Strategy (2021), or the Wildfire Assessment and Resiliency Network (WARN) federal funding.	See recommendation ALL_2618B
Joint Advocates	IPC, PAC, PGE	4. Monitoring Vegetation Programs by Gauging Forest Health	IOUs should leverage relationships with the Oregon Department of Forestry's Prescribed Burn program and explore the cost-effective and ecologically effective prescribed burn method to reduce risk to communities and restore resiliency in different ecosystems.	See recommendation ALL_2618B.
Joint Advocates	IPC, PAC, PGE	4. Monitoring Vegetation Programs by Gauging Forest Health	Advocates recommend each IOU produce a 1-2 pager that can simply and easily communicate important metrics (such as # of miles of lines inspected in a year, or health of the trees within a territory or High Fire Risk Zone) in order to better communicate the state of a utility's vegetation management program.	Staff agrees with the advocate comments and plans to hold workshops to advance content and structure of Updates and Multi-year Plans. See also recommendation ALL_2615B.

Stakeholder	Company	Topic	Stakeholder Recommendation	Staff Comments/ Applicable Recommendation
Joint Advocates	IPC, PAC, PGE	4. Monitoring Vegetation Programs by Gauging Forest Health	IOUs in Oregon must join collaborative efforts through contractual MOUs with public land management agencies, such as through an All-Lands Partnership or a forest collaborative, as Idaho Power has done through the Southwest Idaho All-Lands Partnership, in order to reduce wildfire risk on both public and private land ownerships. This would create opportunities to save money by cutting the IOUs expenses through leveraging federal grants, rather than fronting the entirety of vegetation management costs by themselves.	See recommendation ALL_2618B
Joint Advocates	IPC, PAC, PGE	5. Major advancements in Situational Awareness	Continued coordination to support situational awareness initiatives that improve cost efficiency and maximize the value of shared investments through collaboration and resource sharing. - The lessons learned and the committee-based model exemplified by OWDCIC should be adapted and applied to other areas of utility wildfire mitigation to drive broader, system-wide improvements. It would be worthwhile for utilities to set up this type of model in a couple of areas– with relevant state and local groups for vegetation management activities, and local preparedness initiatives that come from Community Wildfire Protection Plans. It is important to know what is already being done and where priorities and goals overlap.	
Joint Advocates	IPC, PAC, PGE	5. Major advancements in Situational Awareness	IOUs must have accessible comparisons of grid hardening vs situational awareness and other similar cross-comparisons to better illustrate cost-benefits of mitigation strategies.	See recommendation All_2602U and ALL_2603B

Stakeholder	Company	Topic	Stakeholder Recommendation	Staff Comments/ Applicable Recommendation
Joint Advocates	IPC, PAC, PGE	7. Emergency Preparedness: Foster engagement and resiliency to wildfires	We recognize the differences that each utility has when it comes to their outreach and equity methods. For greater transparency and best practices, Advocates urge that utilities develop annual community outreach plans to be filed with the WMPs updates, and a follow-up report to be filed after fire season. These reports would consist of: - List of partners and efforts to expand partnerships at local-levels, both public safety and CBO, and opportunities for collaborative outreach in existing community outreach channels - Communication cadence (How often does communication happens with local government) - Qualitative insights (More narrative on community forums and FAQs) - Baseline equity standards (interpretation standards, facilitation tools, etc.) - Improvements and lessons learned that have shaped or will shape community engagement - Community Resource Center (CRC) coordination, listing community groups, tribal partnerships, etc. - Sharing best practices with other utilities to develop shared metrics of best practices.	See recommendation ALL_2618B
Joint Advocates	IPC, PAC, PGE	7. Emergency Preparedness: Foster engagement and resiliency to wildfires	During in-person workshops and tabletop events in high fire risk zones (HFRZs), utilities provide supplies and resources useful in a PSPS or power outage.	Staff appreciates this feedback for utilities to consider.
Joint Advocates	IPC, PAC, PGE	8. Public Safety Power Shutoffs are rare. Outages are not.	IOUs should provide worst-case restoration estimates to support adequate customer preparation when communicating outage durations.	Staff appreciates the feedback for utilities to consider.

Stakeholder	Company	Topic	Stakeholder Recommendation	Staff Comments/ Applicable Recommendation
Joint Advocates	IPC, PAC, PGE	8. Public Safety Power Shutoffs are rare. Outages are not.	IOUs need to seriously consider initiatives and efforts to mitigate customer harms, Advocates have suggested before including the improvement and expansion of food loss reimbursement processes (e.g., SNAP replacement process), offering bill credits for extended outages and developing both near-term and long-term strategies to reduce the financial, health, and safety impacts of outages associated with wildfire risk and grid operations. We would like explanations on why these strategies to address customer harm have not been considered by utilities or explored by PUC Staff.	No action recommended. Other dockets are exploring resilience valuation.
Joint Advocates	IPC, PAC, PGE	8. Public Safety Power Shutoffs are rare. Outages are not.	PUC Staff should require utilities to establish distinct protocols, data collection, and reporting requirements for sensitive setting-related outages. Given the absence of data and clear identification of sensitive setting outages so far, PUC Staff should consider expanding data collection and reporting requirements to all significant outages during fire season. With UM 2340 planning to capture customer impacts to plug into future RSE models, we have to start meaningfully gathering data now. - At minimum, sensitive setting or fire season outage reporting should align with existing and relevant PSPS rules to enable meaningful evaluation, lessons learned, and captured impacts to people, especially vulnerable communities and small businesses.	See recommendation ALL_2611U
Joint Advocates	IPC, PAC, PGE	8. Public Safety Power Shutoffs are rare. Outages are not.	IOUs should expand and prioritize customer-focused resilience investments, including improving battery backup programs, piloting microgrid projects (which have year-long flexible load benefits), and enhancing funding for local emergency preparedness planning with community partners, with a focus on vulnerable and high-risk populations	See recommendation ALL_2612B

Stakeholder	Company	Topic	Stakeholder Recommendation	Staff Comments/ Applicable Recommendation
Joint Advocates	IPC, PAC, PGE	9. Diversifying and Improving Outreach	To alleviate some of the cost for CRCs we encourage providing free supplies to customers at in-person events to help reduce burden.	Staff is unable to make this a recommendation but appreciates this feedback for utilities.
Joint Advocates	IPC, PAC, PGE	9. Diversifying and Improving Outreach	Advocates recommend having increased communications and information at CRC locations and resources provided. PACs survey information showed that those who rely on medical needs are more likely to have used 7 out of 9 resources.	See recommendation ALL_2611U, ALL_2612U, and IPC_2603U
Joint Advocates	PAC	9. Diversifying and Improving Outreach	PAC should clearly define what “other entities” qualify as a strategic customer, and how their prioritization benefits the community.	See recommendation ALL_2611U and ALL_2618B
Joint Advocates	PAC, IPC	9. Diversifying and Improving Outreach	PAC and IPC should include a greater social media ad campaign to help capture different audiences and languages	See recommendation ALL_2613U
Joint Advocates	IPC, PAC, PGE	10. Evolve mitigation strategies and maximize benefits	IOUs should convene with entities like the Oregon’s Building Codes Division, Oregon State Fire Marshal, and Firewise USA to explore collaborative home hardening education and incentive programs for customers in High Fire Risk Zones (HFRZs).	See Staff recommendation ALL_2614B.
Joint Advocates	IPC, PAC, PGE	10. Evolve mitigation strategies and maximize benefits	IOUs should provide defensible space and home hardening resources and information to all customers through various avenues including community WMP presentations.	See recommendation ALL_2614B
Joint Advocates	IPC, PAC, PGE	harden homes: Strategic investment to reduce catastrophic loss	- Current and new build home hardening. (ember-resistant vents, defensible space, and ignition-resistant materials	See recommendation ALL_2614B

Stakeholder	Company	Topic	Stakeholder Recommendation	Staff Comments/ Applicable Recommendation
AWEC	PAC, PGE	Cost	AWEC is concerned with the Utilities' forecast expenditures included in the WMPs and cautions the Commission against adoption of the WMPs without additional evidence and support of the costs contained within.	Staff appreciates AWEC feedback and believes this is best addressed in the WMP cost recovery dockets through the Automatic Adjustment Clause (AAC).
AWEC	PAC	Cost	PacifiCorp acknowledges the increase in costs and states that the Company is "willing to have conversations with Staff on how these cost concerns can be addressed directly within the WMP via updated future WMP guidelines." This response is insufficient – only reasonable and justified costs that are directly related to, and necessary for, wildfire mitigation, should be included in the WMPs. Further, addressing Staff's concerns regarding year-round and system-wide costs rather than focusing on costs in HFRZ areas, PacifiCorp asserts that "virtually all electrical infrastructure poses some risk under the right combination of conditions," and further reasons that "[i]t is also important to distinguish between work that is done during fire season to mitigate risk and work completed throughout the year that nevertheless is intended to reduce risk when wildfire risk conditions are present." PacifiCorp's response to Staff's feedback is highly concerning. Under PacifiCorp's reasoning, it appears any costs for infrastructure, spanning any part of the Company's service area, during any time of the year, could be considered a wildfire mitigation cost. This is clearly unreasonable and contrary to the Commission's direction for disciplined spending.	See recommendations ALL_2602U, ALL_2603B, and ALL_2604U

Stakeholder	Company	Topic	Stakeholder Recommendation	Staff Comments/ Applicable Recommendation
AWEC	PGE	Cost	Staff raised similar concerns regarding PGE's forecast expenditures for the 2026-2028WMP period – approximately \$238 million and \$146 million for capital and O&M respectively. Staff noted that there are initiatives that are “repetitive of prior work,” “redundant or duplicative from other organizations,” or “seem to benefit general utility operations.” Staff therefore concludes, as it does with PacifiCorp's forecast expenditures, that “it appears the WMP is being used to advance other Company objectives which may not be supported if not explicitly funded through alternative cost recovery means.” In response, PGE cites purported “co-benefits” of non-wildfire projects and attempts to provide reassurance that there is adequate governance and oversight for AAC-funded initiatives. Given the substantial forecasted costs and the concerns raised by Staff, AWEC proffers that such in-house review of costs is insufficient and should be recognized as such.	See recommendations ALL_2602U, ALL_2603B, ALL_2604U, and ALL_2606B

Summary of Staff Recommendations UM 2208

Attachment B

Recommendations Specific to PGE

- **PGE_2601U:** PGE and OPUC Staff should work together to develop methods for evaluating reliability impacts (co-benefits) related to mitigation measures considered. PGE should then compare these results against its earlier results produced using their assumptions (as well as detailing each assumption), in addition to producing the results without modification of the 2012 PGE VOS study.

Joint Recommendations

- **ALL-2601U:** Staff recognizes that the WMP template¹ provides the structure for MYPs and Updates, however, recommends Staff, IOUs, and stakeholders develop guidelines for content that is appropriately contained in an Update and how best to make this information useful for a variety of readers. At minimum, Staff believes Updates need to include: 1) items that summarize the year's deliverables (actuals versus plans, units, and costs); 2) any modeling or refinement in analysis that either results in a change in designated risk or mitigation approach; 3) explanations of actions taken and progress made in response to recommendations that were approved by the Commission, even if not completely fulfilled at the time of Update filing; and 4) thresholds for significant Initiative updates as defined in UM 2340 Order No. 24-236 Appendix A Section 3.4. Staff proposes that a workshop with the utilities, Joint Advocates, and other stakeholders could be an ideal venue for discussion and alignment to occur and suggests it be held during late summer.
- **ALL_2602U:** Recognizing that IOUs are developing explicit evidence supporting how and why they have chosen a particular wildfire mitigation initiative activity, in the interim (if there is not yet detailed data or analysis underlying the activity) they should identify the fundamental principle of the activity (for example reducing probability of risk event, ignition risk, consequence, impact or enhancing awareness, responsiveness, etc.) as well as the key assumptions made to support that strategy, in addition to identifying the intended metrics that will be used to demonstrate the effectiveness of the approach (such as reducing certain types of outages, shortening the duration of fault current, etc.).

¹ <https://apps.puc.state.or.us/orders/2025ords/25-326.pdf>.

- **ALL_2603B:** By the next MYP, the utilities should augment explanations from ALL_2602U with data, calculations, analysis methods, and measurable results—demonstrating the effectiveness of their wildfire mitigation program's initiative activities. In their WMP Reports, IOUs should outline any analysis performed, including whether the initiative activity succeeded or fell short, the lessons learned, and the reasons for any program expansions, reductions, or redesigns. IOUs should also clearly identify the cost impacts associated with these outcomes. This information should be included in the appropriate WMP report initiative subsection's initiative activity section that details the program which can be included in the framework or mitigation explanations. If providing effectiveness for an overall section, evidence can be included in results or continuous improvement subsections. This requirement applies to all major wildfire mitigation programs, including inspection and vegetation management, grid hardening, operational protocols, community outreach, risk assessment methodologies, emergency preparedness, and situational forecasting. Examples include, but are not limited to:
 - Idaho Power's use of a 20 ft vegetation clearance radius for distribution circuits.
 - PGE's rationale for a two-person crew for inspection with an unknown quantity of corrections performed simultaneously.
 - PGE's assessment of optimal clearance distance as discussed in VM 07.
 - Pacific Power's choice of 100 percent quality assurance inspection on all grid hardening projects through post construction inspections.
- **ALL_2604U:** Staff appreciates feedback supplied by the utilities relating to allocation and in an effort to be clear about costs specific to new WMP efforts, IOUs should provide initiative activity costs within each initiative category in the initiative summary tables (with subtotal) as well as those costs attributed to general or embedded programs (with subtotal). In addition, where the program is generally beneficial to other utility processes, Staff and the IOUs will work to detail within the data template workbook how to present that information. Finally, in cases where multistate allocation results in portions of the costs attributed to Oregon customers, Staff will work with the IOUs to clarify what amount the utility proposes to allocate to them. Where costs are grouped across initiative activities the IOU should estimate the percentage of the cost attributed to each initiative activity until cost singularity exists for the activity. IOUs should work with Staff to structure the submittals to fully describe the methods for cost estimation and outline the basis for the benefits being attributed to the measure.

- **ALL_2605U:** Staff appreciates the utilities' response regarding the pilot template feedback. Staff also recognizes that the IOUs have identified certain programs as pilots. However, Staff asserts that a pilot template², including substantial explanation is required whenever the IOU performs any new activity that has risk reduction benefits or that has short or long-term cost implications. While the IOUs identified certain initiative activities as pilots there are a large number of initiative activities that have had no explanation for their existence within the wildfire mitigation program (and relate to new spending or should result in risk reduction). This results in commitment of resources to an action which have never had the rationale fully understood by Staff or stakeholders. Such has been the case with the creation and expansion of weather and camera networks, as well as Pacific Power's substantial expansion of its meteorology, emergency management and most recently wildfire intelligence center. This has resulted in significant costs that were not "piloted", have never been cost-justified and were not compared against other measures to determine their priority as a mitigation measure. In addition to being more expansive in providing information regarding tooling up mitigation measures, IOUs should expand upon the new and additional resources as potential pilots as a means to measure and assess the value provided by these investments. IOUs should include details, where applicable, of the deployment locations/'Application' for pilot technologies and why the given area was chosen. When explaining the reasons for further investment, IOUs should provide more complete project management elements, including key goals, deliverables and milestones the Company intends to assess to measure the merits of the activity.
- **ALL_2606B:** IOUs should identify key assumptions associated with risk quantification and test them, performing sensitivity analysis to establish resulting risk and consequences, explaining the modeling variability based on these changes. In cases where the utility uses a vendor product to model risk, they should develop processes that can be conducted to evaluate the model's sensitivity to variations of key attributes. In cases where the IOU has internally developed its model Staff requests models be evaluated by an independent authority. In all cases, explanations regarding the rationale for the performed sensitivity analysis, and the tested variables should be provided. Utilities shall explicitly indicate which models and analysis are internally developed, vendor provided or contracted. Examples include:

² PGE: Pilot templates were developed and ordered in Order No. 25-326 Appendix A, page 42 of 70.

- Weather and climate change scenarios and the basis for the choice, including wind speeds and directions, ambient temperature, and application within the gridded environment.
 - Climate inputs, including long- and short-term drying patterns leading to, at minimum, fuel moisture metrics.
 - Fuel characteristics and granularity of any gridded cells.
 - Detection timing, if part of the consequence modeling (whether detection responsiveness, impact estimation, assumed burn period, etc.).
 - Ignition probability (established to identify service territory HFRZ).
 - Ignition spread under the given conditions, including identification of the spread-modeling algorithm or source.
 - Spread consequences, including injuries, structures, timber loss, or other quantifiable losses and the sources considered and used.
 - Burn period, and explanation for the choice given each scenario considered.
 - Each subjective measure introduced into the calculation process, including detection assumptions based on population, distance to fire protection resource, coverage by camera viewsheds, etc.
 - Each multiplier used within the calculation process that is not directly attributed to a specific algorithm (i.e., calibration of burned area based upon comparison to a specific event chosen by the utility).
 - When appropriate, utility equipment ignition probability to estimate utility wildfire consequences.
 - And other assumptions used to arrive at probability, risk, impact, or consequences of wildfire.
- **ALL_2607U:** Identified in an Appendix D of the WMP Report, the IOUs should provide:
 1. Maps that show current and historically-identified areas designated as HFRZ or Areas of Interest from the first risk model and
 2. When the HFRZ or Areas of Interest are modified, identify information relating to any changes comparing the current against the most recently-approved WMP HFRZs or Areas of Interest including:
 - A narrative description of why the boundary was adjusted, added, or removed, including the conditions that have changed and how the modification aligns with current wildfire risk.
 - The datasets, risk models, geospatial layers, climate projections, vegetation assessments, ignition probability analysis, or subject matter expertise were used to support the change, including a description of

analytical methods, thresholds, weighting factors, and any expert judgment, including any sensitivity analysis or assessments used to ratify the revision.

- A table showing asset types and customers affected by the change categorizing as added, removed, and unchanged for each Area of Interest, HFRZ or non-HFRZ.
- **ALL_2608U:** Staff recommends that IOUs provide, in an Appendix to the WMP Reports, comprehensive documentation of all historical fire data used as part of the consequence modeling processes. At a minimum, IOUs should include:
 - Criteria used to identify relevant fire events.
 - All historical fire events included in the analysis, along with the basis for its selection.
 - Relevant event details, such as injuries, fatalities, damaged or destroyed structures, acres burned, timber board feet lost, suppression, and any other quantifiable impacts used to inform consequence scoring and/or specific delineated costs.
 - What adjustments, normalizations, and associated datasets are integrated into the consequence model, such as weighting factors, scaling methods, final affected areas impacted, or statistical techniques.
 - Any limitations or uncertainties associated with the historical dataset and how those limitations influenced the results.
 - Datasets used to evaluate affected populations, structures, and other associated measured effects of the fire consequence location.
- **ALL_2609U:** IOUs should outline in a table the options for mitigation approaches versus risk event drivers and generally describe criteria that would influence the choice, resulting in a preferred mitigation. For example, outage history that indicates vegetation contacts might result in either vegetation management, covered conductor or undergrounding as options. However, additional considerations may result in a preference toward one of them.
- **ALL_2610U:** The IOUs should clearly explain how they determine whether to proceed with or suspend completion of projects that are no longer identified as priorities (due to limited risk reduction or due to reductions in utility ignition consequence) as their understanding of risk and mitigation selections evolves, with an eye toward maximizing risk reduction while avoiding stranded or underutilized investments. As part of this process, IOUs should review all planned or targeted mitigations to determine priorities based upon: 1) modifications to the risk areas; 2)

changes in sustained zone of protection risk scores; or 3) new mitigation measures and their impact on reducing risk. Specifically, each utility should identify its approach to establishing "off ramps" for any programs when it determines there may be higher value approaches to reducing wildfire risk.

- **ALL_2611U:** The IOUs should outline how they ensure positive PSPS notification confirmation occurs for critical customers, including individuals identified as medically vulnerable and how the Company works with public safety partners if they are unable to communicate with an affected customer. Also, the IOUs should outline their methods of informing customers and communities (particularly critical and medically vulnerable customers) when sensitive settings are enabled.
 - Additionally, in their annual PSPS filings, pursuant to OAR 860-300-0070, IOUs should work with advocates, partners and Staff to enhance these reports to include details relating to:
 - Methods to communicate with customers regarding sensitive settings and IOU attempts to mitigate reliability impacts to the customers and communities experiencing them;
 - PSP outreach and coordination, including partner engagement, cadence of outreach, and how feedback received from these partners has influenced the IOU's program;
 - CBO outreach and coordination, including communication content shared through the CBO;
 - Tabletops, functional exercises or PSPSs conducted within their service territories; and
 - After-action reviews for each tabletop, functional exercise or PSPS performed and how that feedback has changed processes within the IOU.
- **ALL_2612B:** IOUs shall improve transparency by responding to stakeholder feedback and surveys on their Wildfire Mitigation Plan (WMP) and related processes. Survey questions and responses should be included in WMP Report Appendix F using charts or graphics to demonstrate the feedback received. Additionally, IOUs should include the following:
 - IOUs should identify appropriate demographic cohorts, including language proficiency level (within their service territory), public safety partners (PSPs), community communicators (e.g., churches, schools), critical customers, medically vulnerable customers, and customers with access and functional needs, to better understand feedback from each group.

- IOUs should identify specific updates, completed or planned, to their notification and coordination programs based on survey results and feedback from critical customers and PSPs, including implementation timelines.
 - Due to Idaho Power's low customer feedback for its Oregon customers, Staff recommends Idaho Power develop proxy methods to establish ways to gauge how best to support Oregon customers.
- **ALL_2613U:** Staff recommends that IOUs continue developing tailored messaging and other resources to support communication with distinct customer groups and expand their multilingual outreach efforts.
 - The IOUs should analyze and report on the non-English languages spoken within their Oregon service territory, which could be based upon data such as that available through the ACS.
 - Based upon these findings, the IOUs should provide recommendations regarding their plans to produce deliverables with timelines. Alternatively, the utility should explain, based on its research supported by verifiable data, why educational materials in additional languages are not necessary.
 - Staff recommends that Idaho Power continue developing tailored messaging focused initially on Spanish language resources, including providing detailed deliverables with explicit timelines.
- **ALL_2614B:** Staff recommends that IOUs expand the availability of third-party, industry-recognized wildfire-safety resources across their customer-facing platforms. IOUs should provide references to these materials on their websites, social media channels, and at community and wildfire-preparedness events, and should offer them in multiple languages where applicable. These resources should include, but not be limited to, information on home hardening, defensible space, community preparedness programs, and current fire-location and situational-awareness tools. In addition, at events that IOUs coordinate, they should provide opportunities for community partners to inform attendees about matters beyond utility wildfire risk, including such partners as OSFM and IBHS to provide information to homeowners about strategies they can use to improve their resilience to any wildfire event. IOUs may consider working jointing to develop these resources and strategies.
- **ALL_2615B:** IOUs should clearly describe the different inspection types and deployment locations within their inspect/correct and vegetation programs as they relate to mitigating wildfire risks in HFRZs. To the extent these programs exceed relevant regulations, IOUs should identify the rationale, detail the historic discovery

of inspection conditions, their correction timeframes and their correlation to ignition risk events or risk event drivers. For inspect/correct and vegetation programs the utilities must identify the basis for optimal QA/QC, consistent with ALL-2618U, and the Company's underlying economic goals and results. Lastly, IOUs should explicitly identify the funding mechanism used to support these efforts, whether general rates, WMP AAC, or other cost recovery method.

- **ALL_2616B:** As IOUs evaluate and consider line-monitoring and various asset/vegetation inspection technologies, they should provide clear data demonstrating the benefits of these technological advancements, including how the results guide program evolution and support the rationale for any location-specific deployment. This should include providing technology or practice details that clearly and completely identify what the general objective of the technology is, what criteria were used to optimize its deployment, as well as outlining where, why and when locations were chosen and how they are recorded into the IOUs records for future effectiveness analysis. The utility should further explain how these tools reduce wildfire risk, improve cost-effectiveness, their impact to standard operational work, and how the tool will either replace, modify, or complement existing programs.
- **ALL_2617U:** IOUs shall include in their WMP reports quality assurance or quality control programs for the following WMP initiative activities: inspect/correct, vegetation management, and reconductoring programs. These programs should identify both the quality control requirements (where the work is being done by the utility) as well as the quality assurance requirements (where the work is being done by an agent). These programs should recognize both the delivered product being completed at a location, and outline program requirements including:
 - Identified sample size and the rationale for that size.
 - Pass rate percentages, considering environments, which could include HFRZ, rural, or urban environments, and the rationale to support the rate and its application to the environment, and the expected confidence interval.
 - Procedures used to adjust sampling processes based on historic performance, i.e., tightened or loosened sampling.

The initiative quality assurance or control plan should also outline how record keeping, including mapping, is being quality controlled. It should identify the details of the work being done with locational precision, detailed accuracy, and completeness for the record produced, including, where appropriate, its existence within corporate databases, including GIS.

- **ALL_2618B:** IOUs should expand their consideration for collaboration and partnership, such as described in stakeholder comments, incorporating strategies with other wildfire-resilience organizations. Staff recommends the following inclusions as a tabled appendix within the WMP report updates:
 - The partner organization.
 - The objective of the joint partnership.
 - The utility role in the partnership.
 - How responsibilities are set and coordinated.
 - Which initiative activity is the partnership supporting.
 - How the partnership maximizes wildfire-resilience community benefit while minimizing customer cost.
 - How costs and benefits are shared.
 - How soon will the impact of the partnership be achieved, including any deliverables or milestones planned.
 - Whether contributions are financial, technical, in-kind, or employee time.
 - Resource participation by the partners, including any grants received from them.
 - The utility, organization, or other actor that provided the example being leveraged.

As an example, Idaho Power describes how it collaborates with the All-Lands Partnership, which supports vegetation management across jurisdictional boundaries, while several of the consumer-owned utilities address partnerships they have found useful. Staff plans to jointly work with IOUs to further structure reporting in the Data Template Workbook and WMP Report Template with a partnerships/grants worksheet to create consistent IOUs' responses.

- **ALL_2619B:** IOUs should provide a comprehensive outline of their current ignition and investigation tracking, including clearly demonstrating processes for detecting, recording, analyzing and reviewing ignition events as well as all data elements documented for each event (such as those required for FM 221 reporting). Additionally, the IOU should provide information regarding any detailed procedures for conducting root-cause analyses; and mechanisms for incorporating findings from past and present ignition investigations into ongoing wildfire-mitigation initiatives. Details for the program shall be included as part of the Risk Methodology and Assessment section of the WMP.

Previous Recommendations DUE 2027

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