



**Portland General Electric Company**  
121 SW Salmon Street • 1WTC0306 • Portland, OR 97204  
portlandgeneral.com

July 27, 2021

***Via Electronic Filing***

Public Utility Commission of Oregon  
Attention: Mark Rettmann  
Electric Safety Program Manager  
P.O. Box 1088  
Salem, OR 97308-1088

Re: AR 638 Risk-Based Wildfire Protection Plans – Joint Utilities Comments Regarding System Hardening

Dear Filing Center:

On behalf of Portland General Electric Company (PGE), PacifiCorp DBA Pacific Power, and Idaho Power Company (Joint Utilities) we want to thank you for the continued efforts and partnership in addressing the challenges that we all face due to increasing wildfire events. The impacts of climate change are rapidly accelerating and require us to think, prepare, and act in new ways, including via increased partnerships. We appreciate the Public Utility Commission of Oregon's (OPUC or Commission) efforts, transparency, and diligence in working with the Joint Utilities.

The upcoming AR 638 System Hardening Workshop on August 5, 2021, to discuss how system hardening can help reduce the probability of utility caused wildfires is a great opportunity to share ideas with the OPUC and other utilities. In order to make the most of this opportunity, we would like to suggest some general principles to help guide the conversations.

In discussions between the Joint Utilities, we have drafted three general principles by which we encourage the Commission to consider as a focus for the AR 638 System Hardening workshop(s).

***Reducing the impact of PSPS events on customers***

Here we would include topics such as system automation and segmentation. There are many ways in which we can reduce the impacts to customers due to wildfire events, and each utility will have specific recommendations based on their system configuration, geography, and customer base.

***Reducing the probability and impact of faults***

Reducing the likelihood of grid-related faults will, in turn, reduce the potential for ignition sources and will yield the greatest benefits to reducing the risk of wildfires. There are many mitigation options, such as fire safe fusing, animal protection, enhanced inspections and cover conductor systems, to targeted undergrounding—and the most effective and efficient hardening options are likely to differ by region and utility.

***Impact of wildfire on utility infrastructure***

We also must ensure that our infrastructure is as resilient as possible in high-risk wildfire areas. Utilities can deploy mitigations such as non-wood pole alternatives, fire-retardant paints and pole (e.g., mesh) wraps, defensible spaces, and enhanced vegetation management practices.

We look forward to the upcoming workshops, which we hope can be a platform discussing and analyzing the multiple lenses through which system hardening can be considered. The Joint Utilities offer the above suggestions as a way to help frame the conversation in a productive, constructive, and inclusive manner that will inform, educate, and seek feedback from stakeholders who may not be familiar with the actions and activities of utilities in their commitment to reduce wildfire risk.

PGE, individually, is also looking forward to discussing these principles with you in the meeting scheduled for Wednesday July 28<sup>th</sup>.

Respectfully Submitted,

*/s/ W. M. Messner*

William M. Messner  
Director Wildfire Mitigation & Resiliency  
Portland General Electric Company

*/s/ Alison Williams*

Alison Williams  
Regulatory Policy & Strategy Advisor  
Idaho Power

*/s/ Doug Dockter*

Doug Dockter  
Transmission & Distribution Engineering & Reliability Senior Manager  
Idaho Power

*/s/ Amy McCluskey*

Amy McCluskey  
Managing Director, Wildfire Safety & Asset Management  
PacifiCorp

Cc: OPUC Filing Center