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November 19, 2021

Via Electronic Filing

Filing Center
Oregon Public Utility Commission
201 High Street SE, Suite 100
P.O. Box 1088
Salem, OR 97308

Re: Docket AR 638 Risk-Based Wildfire Protection Plans – Draft Phase II Rules

Dear Filing Center:

Urbint appreciates the opportunity to provide comments on Oregon Public Utility Commission Staff's AR 638 Draft Phase II Rules that represent an expertise in risk reduction through the design of quantitative frameworks and predictive technology.

Urbint is a software-as-a-service company that provides the utility sector with artificial intelligence-powered risk management software. Urbint combines data from utility assets with external features such as weather, topology, and the built environment to anticipate future and existing threats to infrastructure and recommend utility mitigation action.

The benefits of artificial intelligence and machine learning in risk analysis

Urbint commends the Commission for establishing guidelines for risk assessments in Section 860-300-0004, Risk Analysis in Utility Wildfire Mitigation Plans. In particular, the inclusion of external, up-do-date data that determines granular, heightened wildfire risk. Furthermore, that situational decision-making related to operational and capital programs should be based on the real-time characterization of wildfire risk.

Urbint submits for the record the benefits of machine learning and other artificial intelligence technologies that can provide valuable, actionable insights that other types of risk analyses cannot. Machine learning identifies patterns and predicts behavior among hundreds of variables, allowing for granular, dynamic risk assessments on a daily basis. As a result, it is a powerful tool for identifying utility wildfire risk conditions among various environmental factors such as temperature, humidity, wind speeds, and asset factors such as age, condition, and orientation.

Respectfully Submitted,

/s/ Madeleine Moyano

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Urbint

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