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May 3, 2021

Re: Docket AR 638 on Risk-Based Wildfire Protection Plans

Dear Public Utility Commission:

Under Governor Kate Brown's Executive Order 20-04 (EO), the Public Utility Commission (PUC) has the ability to prioritize utility responsibility to prepare communities for public safety power shut offs (PSPS) and to identify emerging issues through ignition reporting requirements. Thank you for the opportunity to comment on staff's draft temporary rules regarding these matters.

Rogue Climate is a climate justice organization with offices in Coos Bay and Phoenix, Oregon. This September, our community experienced the most devastating wildfire in Oregon's recent history. The Almeda Fire displaced thousands of people in Talent and Phoenix and burned over 3,000 structures, including our Rogue Valley office. Over the last 7 months, Rogue Climate, along with many local partners and volunteers, has been supporting families displaced by the Almeda fire. At the Fire Relief Center in Phoenix, OR, we continue to host 500-700 people every week who need support, talk to them about the recovery process and hurdles they're facing, and connect them with resources.

Rogue Climate serves Rogue Valley and South Coast communities, which are both directly impacted by new Pacific Power PSPS outage plans and would be directly affected by OR PUC AR 638.

We are writing to encourage the PUC to be firm and effective in implementing improved coordination, resources, support, and planning to treat the needs of Oregon communities during PSPS incidents, especially for rural, elderly, non-English speaking, disabled, immigrant, low-income and other high-risk groups.

Rogue Climate provides the following recommendations for your consideration and implementation in drafting the PUC's Risk-Based Wildfire Protection Plans:

Recommendations regarding PSPS protocols:



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- The PUC must begin an evaluation of power shutoff implications for rural communities and other high-risk communities, such as residents with medical needs that are dependent on reliable energy.
 - During a PSPS incident, there should be appropriate resources for high-risk community members to access life-saving electricity, whether it is being supplied with backup power resources or ensuring communities have access to emergency resiliency hubs.
 - Protecting high-risk groups can also look like establishing auto-enrollment systems into power shutoff resilience/support programs to ensure access to shutoff protections. Utilities can better identify those who are medically vulnerable, for example, by working closely with entities that already have robust lists, such as the Oregon Department of Human Services and County Health Departments.
- The PUC must require utilities to upgrade out-of-date infrastructure in fire prone areas as soon as possible. Moreover, the PUC must ensure that costs are not passed on to customers for upgrading utility infrastructure to withstand increased wildfire danger.
 - We are supportive of science-based and climate-smart plans that mitigate wildfire risk to utility infrastructure in an attempt to reduce the risk of utility caused catastrophic fires, yet the costs of upgrading critical utility infrastructure to the best available standards must not be passed along to consumers, especially to low-income rural and communities of color.
 - Utility infrastructure upgrades must be prioritized in low-income rural communities and communities of color living in areas with highest risk of wildfires.
- The PUC must expand public outreach and education about PSPS to inform the public on the impacts and hazards of power outages, in addition to what resources are available for high-risk community members in PSPS zones.
 - Utilities and State resources must support the development of PSPS outreach plans and resources to get multi-lingual, comprehensive, and accessible educational materials and information to communities across the state in coordination with local community based organizations.
 - PSPS education must also be shared through various communications such as radio and TV stations, local papers, social media, and community events.



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- All PSPS public outreach and education must follow the Oregon Environmental Justice Taskforce's best practices for community engagement.¹ All public outreach and education must be designed in a way that ensures accessibility in both language and culture.
- PSPS plans need to be localized and developed in collaboration with local safety officials, community-based organizations, and state agencies before the 2021 wildfire season, or in other words, as soon as possible.
 - During PSPS incidents, communications need to be effective and accessible. During the Almeda Fire, most residents impacted by the fire did not receive any emergency alerts. Only Ashland residents who opted into English-only emergency alert texts received information during the fire. During and for days after the fire, few community members had access to the internet to receive notifications, find support, or look up critical information. We need to ensure that we have a variety of language-accessible communications that will reach people in various circumstances.

Recommendations regarding Ignition Reporting Requirements:

- We currently support utilities posting PSPS reports publicly. We believe reporting requirements should also include the number of customers affected, the number of vulnerable customers, and the duration of the shutoff, as well as, quickly provide regulators with a report on certain fires in their service territory, including their cause and estimated damages and require utilities to submit updated wildfire prevention plans at least annually.

Thank you for your time and consideration in reviewing these recommendations and considering them throughout the implementation process. Rogue Climate looks forward to future conversations and involvement in the Executive Order implementation at the PUC.

Sincerely,
Alessandra de la Torre
Energy Justice Organizer, Rogue Climate

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https://www.oregon.gov/gov/policy/environment/environmental_justice/Documents/Oregon%20EJTF%20Handbook.v4.pdf