



Oregon Public Utility Commission
201 High Street SE, Suite 100
Salem, OR 97301-3398

January 8, 2021

Dear Commissioners,

Oregon Solar Energy Industries Association (OSEIA) submits these comments as OSEIA's response to the Public Utility Commission's (PUC) December 15th Scoping Survey with regards to the AR 638 Wildfire Mitigation Plan Rulemaking.

Scoping Survey Response:

• **What are your objectives/expectations for wildfire mitigation?**

OSEIA urges the PUC to focus on building community resilience in light of increased public safety power shutoffs. PSPS events place a significant burden on emergency services and medical care as well as vulnerable households. Not only should the PUC encourage the use of microgrids for essential demand like hospitals, shelters, and community centers, but the PUC should also require utilities to examine microgrids in their planning and incentivize the use of residential and commercial storage. Utilities should not simply replace old or damaged infrastructure in high-risk areas, but utilities should also upgrade equipment where possible to increase the compatibility for GHG reducing technology. DER systems can reduce strain on the grid, mitigating future risk and providing grid operators more room to handle outages.

Expanding the transmission system will also have the benefits of increasing resiliency in the face of increased wildfires. Additional transmission will build redundancy so that when there are outages to the transmission and distribution system due to wildfire, generation can still get to load. Utilities should study the impacts to communities of preventative shutoffs due to wildfire risk and wildfire-caused blackouts. Knowing these impacts can help put in perspective the costs of preventative measures that utilities could be putting in place such as redundant transmission lines.

• **What are the components of a comprehensive electric utility WMP e.g., what does the table of contents look like?**

WMP should be broken down into succinct stages: Prevention, Detection, Response, with meaningful, quantifiable metrics submitted frequently and systematically. The WMP report should describe objectives for an early, mid, and long-term plan. Any long-term planning should take into account the co-benefits of solar+storage solutions. To the greatest extent possible, a WMP should be written in plain language so as to ensure meaningful information is also provided to the public.



- **What are your priorities and/or what are the most urgent issues to tackle before next fire season?**

Before next fire season, the PUC needs to do more to prepare communities for PSPS events. Although risk assessment and emergency services coordination are vital to ensuring PSPS events happen efficiently, the electricity demand is still there. At minimum, emergency services, hospitals, and shelters need to have off-grid power solutions in place to support vulnerable communities and possible evacuation centers.

- **What questions do you have about the rulemaking process and/or WMPs?**

How much access will the public have to the underlying data of utilities' WMPs?

- **What are your other comments or concerns?**

Ensure that Commission staff do not assume prior knowledge of utility regulation to participate in the rulemaking process to ensure meaningful communication between the PUC and the public.

Community access to data to ensure they can identify high risk areas and incentivize DER systems through local programs.

OSEIA appreciates the work done on this rulemaking so far and looks forward to working with the commission throughout this process.

Sincerely,

A handwritten signature in black ink that reads "Angela Crowley-Koch".

Angela Crowley-Koch
Executive Director