

**VIA ELECTRONIC FILING**

April 7, 2022

Public Utility Commission of Oregon  
201 High Street SE, Suite 100  
P.O. Box 1088  
Salem, Oregon 97301

Re: Docket AR 638 – Risk-Based Wildfire Protection Plans/Proposed Public Safety Power Shutoff (“PSPS”) rules in Division 300

Dear Filing Center:

Idaho Power Company (“Idaho Power”), Portland General Electric Company (“PGE”), and PacifiCorp d/b/a Pacific Power (“PacifiCorp”) (collectively, the “Joint Utilities”) are grateful for the opportunity to offer final comments on PSPS rules as proposed by the Administrative Hearings Division (“AHD”) in the Public Utility Commission of Oregon’s (“OPUC” or “Commission”) Docket AR 638.

The Joint Utilities previously offered comments on proposed PSPS rules on March 11, 2022. These additional comments specific to Oregon Administrative Rules (“OAR”) 860-300-0006, serve as a supplement to, not a replacement for, previously filed comments on PSPS.

In the course of wildfire-related planning and scenario exercises for the coming wildfire season, the Joint Utilities identified the need for clearer PSPS communication timeframes as a way to appropriately alert customers, Critical Facilities, and Public Safety Partners to the end of a PSPS event and the start of re-energization.

The Joint Utilities offer the following redline edits for three sections of OAR 860-300-0006. The justification for these redlines is provided below.

(3) communicating with Public Safety Partners under 860-300-0006(1)(b)(F) and (G):

(F) At a minimum, status updates at 24-hour intervals until the conditions prompting the PSPS have ended ~~service has been restored~~;

(G) Notice of when re-energization efforts will ~~begins~~ and when re-energization is expected to be complete;

(2) communicating with Critical Facilities under 860-300-0006(1)(c)(C) and (D):

(C) At a minimum, status updates at 24-hour intervals until the conditions prompting the PSPS have ended ~~service has been restored~~;

(D) Notice of when re-energization efforts will ~~begins~~ and when re-energization is expected to be complete.

(3) communicating with customers under 860-300-0006(2)(b)(F) and (G):

(F) After initial notification, the Public Utility will provide, at a minimum, status updates at 24-hour intervals until the conditions prompting the PSPS have ended ~~service has been restored~~;

(G) Notice of when re-energization efforts will ~~begins~~ and when re-energization is expected to be complete.

Frequent and accurate communication with customers, Public Safety Partners, and Critical Facilities will be essential before, during, and after PSPS events. The Joint Utilities want to ensure that all PSPS-related communications and alerts are as accurate and up-to-date as possible. As currently drafted, however, the PSPS rules could confuse PSPS and storm and/or weather-related outage communication.

In our separate utility PSPS planning exercises, the Joint Utilities identified a number of possible scenarios in which a storm or other weather-related event could create a traditional (non-PSPS) outage (e.g., downed poles or lines due to wind damage). In such circumstances, it would not be possible to re-energize all customers after the conditions prompting the PSPS event have ended. Yet, the rules, as drafted, suggest that the PSPS is not officially over until the last customer under the PSPS has their power restored. If a weather-related outage causes an extended restoration effort (involving facilities that could have otherwise been re-energized once PSPS conditions are no longer at issue) for some subset of customers, the Joint Utilities feel strongly that the entire span of time (from PSPS start to last customer re-energization) should not be the way that utilities manage or log PSPS events. Such “cradle-to-grave” timing could be confusing to customers about the source of their outage.

The proposed modifications above are not intended to result in fewer communications with customers, Critical Facilities, or Public Safety Partners, but rather ensure that the best and most accurate information about conditions and outages is shared. Customers, Critical Facilities, or Public Safety Partners that might experience a storm-related outage concurrent with or directly after a PSPS would be transitioned to traditional outage communication protocols after a PSPS conditions have ended.

The Joint Utilities recognize that it would have been preferable to include these suggested modifications in our first round of comments. However, this proposal came about through fire season planning exercises conducted after our comments were filed, and the goal of these modifications is to create a working setting of rules that contemplate real circumstances that utilities, customers, Critical Facilities, and Public Safety Partners might encounter. With these potential circumstances in mind, the Joint Utilities offer the above comments for consideration and would be happy to discuss in greater detail.

Respectfully Submitted,

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Cc: OPUC Filing Center