

January 8, 2021

***VIA ELECTRONIC FILING***

Public Utility Commission of Oregon  
Attn: Filing Center  
201 High Street SE, Suite 100  
Salem, OR 97301-3398

**Re: AR 638—PacifiCorp’s Responses to Scoping Survey**

PacifiCorp d/b/a Pacific Power (PacifiCorp) submits for filing its responses to the Public Utility Commission of Oregon (Commission) Staff’s December 15, 2020 Scoping Survey.

On August 26, 2020, the Commission adopted the recommendation from Staff to initiate the informal phase of a rulemaking to address risk-based wildfire protection plans and planned activities consistent with Executive Order 20-04. A workshop was held on December 10, 2020, to kick off the informal rulemaking process with stakeholders and begin the scoping process. On December 15, 2020, Staff issued a scoping survey to gather stakeholders’ “objectives, priorities, ideas, uncertainties, and questions on the topic of wildfire mitigation and wildfire mitigation plans (WMPs).” Below are PacifiCorp’s responses to the scoping survey.

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

The overarching objective of wildfire mitigation planning by an electric utility is to effectively and efficiently reduce the risk of catastrophic wildfire associated with utility operations. With respect to specific objectives and expectations for the outcome of this rulemaking, PacifiCorp suggests that the proceeding should:

1. Establish clear expectations for Operators<sup>1</sup> of overhead equipment regarding certain plan elements that will be required, including any required schedules for implementation;
2. Develop a transparent process for evaluating the risk assessment methodologies of various utilities, with the goal of promoting a consistent metric for comparison across different geographies and service areas; address “seams” issues between various Operators<sup>2</sup> to maximize statewide wildfire mitigation;
3. Expand understanding of wildfire risks, to identify potential mitigation activities advanced in collaboration with other community stakeholders, including customers, landowners, and local fire suppression agencies;
4. Establish the scope of work and responsibilities of an Independent Evaluator(s) (IE); and
5. Address cost recovery considerations, including evaluation of performance metrics.

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<sup>1</sup> [OAR 860-024-0001](#) (5).

<sup>2</sup> *Id.*

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

During the summer of 2020, PacifiCorp provided staff with a pre-workshop draft Wildfire Mitigation Plan. That draft included a table of contents which tracks the primary components of PacifiCorp's comprehensive approach to wildfire mitigation planning. That table of contents included sections for risk analysis, operational practices, inspection and correction, vegetation management, environmental, construction standards, system hardening, new construction, situational awareness, public safety power shutoff, emergency management and response, and performance metrics and monitors. PacifiCorp is continuing to evaluate the best approach to structure the plan. For example, PacifiCorp may group mitigation activities to differentiate between baseline programs, system hardening, system fault response, and operational strategies. Along those lines, a table of contents might look as follows:

1. Risk Analysis – with a goal to identify areas within the service territory that are subject to heightened risk of wildfire (which PacifiCorp designates as fire high consequence areas or FHCA) and when those risks exist, in addition to what the primary risk drivers might be (i.e., vegetation, equipment issues).
2. Wildfire Risk Mitigation Programs
  - a. Baseline Programs, including:
    - i. Vegetation management
    - ii. Inspection and correction programs
    - iii. Reliability strategies
  - b. System Hardening
    - i. Covered conductor
    - ii. Fire resilient structures
    - iii. Impact-improved equipment
  - c. System Fault Response
    - i. Risk mitigation strategies for arc energy
    - ii. Current limiting equipment
    - iii. Remote protection modifications
    - iv. Advanced Protection Schemes
  - d. Operational Strategies
    - i. Work practices including inspection standards and timeframes
    - ii. Crew readiness for fire conditions
    - iii. Protection control systems, (i.e., when to alter reclose/non-reclose strategies)
    - iv. Reactive de-energization (i.e., when incident commanders order equipment to be de-energized)
    - v. Public Safety Power Shutoff (i.e., when risk levels warrant reducing potential ignition sources due to electric fault events)

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

PacifiCorp's priority is ensuring maximum progress towards wildfire mitigation activities already identified in advance of the upcoming wildfire season. In addition, prioritization of the scope and methodology and criteria for the selection of the IE will be critical. Early identification of the role of the IE will allow for meaningful engagement of the IE in the development of subsequent wildfire mitigation planning and evaluation of current wildfire mitigation efforts, concurrent with their execution.

PacifiCorp believes focusing on risk assessment, coordination and communication, and allowing investor owned utilities (IOUs) to continue executing on plans underway should be the highest priority for the next fire season.

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

PacifiCorp does not have specific questions about the rulemaking process or WMPs, at this juncture, but reiterates that Oregon is not a homogenous environment with regard to wildfire risk. As a result, there may appropriately be significant differences between utility WMPs. In addition, successful state-wide wildfire mitigation encompasses entities beyond just IOUs and the rulemaking should contemplate how the framework established by the future WMP rules will harmonize with efforts by other relevant entities and agencies.

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

Formulating a WMP is a complex effort, and it may require segmentation or sequencing of particular mitigation activities. It may also be impacted by other policies and statewide initiatives that need to be coordinated (i.e., electric vehicle advancement, distribution system planning expectations) and any compliance obligations of such actions need to be accorded appropriate weight relative to the risks created by the advancements of those efforts. These could even include federal priorities, i.e., Federal Communication Commission-led programs affecting joint use of overhead structures.

PacifiCorp appreciates the opportunity to provide input on the scope of the rulemaking and looks forward to continuing its active participation in this proceeding.

Please direct any questions regarding this filing to Cathie Allen, Regulatory Affairs Manager, at (503) 813-5934 or Heide Caswell, Director of Asset Performance and Wildfire Mitigation, at (503) 813-6216.

Sincerely,



Etta Lockey  
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