



"The Power of Community"

January 8, 2021

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

RE: Docket No. AR 638

Dear Commissioners:

Attached is the Oregon Rural Electric Cooperative Association's (ORECA) response to the Public Utility Commission's (PUC) December 15, 2020, Scoping Survey with regards to the Docket AR 638 Wildfire Mitigation Plan Rulemaking.

ORECA appreciates the opportunity to work with the PUC on this very important issue.

Sincerely,

Roger Kuhlman
ORECA Consultant for

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Executive Director

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AR 638 Scoping Survey

What are your objectives/expectations for wildfire mitigation?

Develop risk-based plans, unique to each utility, to reduce the probabilities for their being a source of ignition. The wildfire mitigation plan will be specific to each utility while following industry best practices, OPUC safety rules, and NESC requirements.

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

- Evaluate risk of wildfire in areas of service territory
- Cost effective means for mitigating risk
- Preventative actions and programs to minimize the risk of facilities involved in a wildfire
- Construction design to mitigate fire risks
- Protocols for deenergizing power lines and adjusting power system operations to mitigate risks of wildfires
- Procedures to inspect company infrastructure
- Vegetation management procedures
- Community outreach and public awareness efforts
- Review and update plan for effectiveness

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

Establishing communication protocols to coordinate wildfire mitigation efforts between the various government entities and those in charge at utilities to coordinate wildfire mitigation issues.

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

Recognizing that COUs need to be able to maintain local control, as each cooperative is unique and has specific territories throughout the state, does the PUC have issues we have not covered?

What are your other comments or concerns?

WMP will have two components: policy issues and a separate operating procedure. The policy component will be reviewed and approved by the governing board of each utility as the ultimate decisionmaker for determining what actions to take to comply. The operating procedure will be an internal document that will be written and approved by each utility and only available to utility personal.