

May 3, 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 — Joint Utilities’ Comments Regarding Draft Temporary Rules on Wildfire Incident Reporting and Public Safety Power Shutoff (PSPS)

INTRODUCTION

PacifiCorp d/b/a Pacific Power (PacifiCorp), Portland General Electric Company (PGE), and Idaho Power (Idaho) (PacifiCorp, PGE, and Idaho are collectively referred to as the “Joint Utilities”) appreciate the opportunity to provide comments to the Public Utility Commission of Oregon (Commission) regarding the draft temporary rules on wildfire incident reporting and Public Safety Power Shutoff (PSPS). Provided as Attachment 1 and 2 is a redline and clean version, respectively, of the draft rules showing proposed edits submitted by the Joint Utilities, with the reasons for these proposed edits explained in the comments below. The Joint Utilities’ proposed edits take into consideration what is feasible to implement for the upcoming 2021 fire season, that is only a few weeks away, while the permanent rules are developed.

COMMENTS

I. Incident Reporting OAR 860-024-0050

The Joint Utilities support the general objective to have temporary procedural mechanisms for reporting utility-related wildfire incidents. The Joint Utilities’ suggested edits are intended to add clarity around what needs to be reported, how it is supposed to be reported, and when it should be reported during this interim period while the permanent rules are developed.

The proposed additional language in OAR 860-024-0050 appears to be drawn from language in a Decision from the California Public Utilities Commission, namely Decision 14-02-015, dated February 5, 2014, *Decision Adopting Regulations to Reduce the Fire Hazards Associated with Overhead Electric Utility Facilities and Aerial Communications Facilities*. Specifically, in the Fire Incident Data Collection Plan in Appendix C of that Decision, Principle #4 lists the same three conditions under which reporting would be required. The suggestions to use “conditions” instead of “criteria” and “any event” instead of “fire related incidents” are

merely intended to maintain consistency with the language in Decision 14-02-015. The knowledge qualifier in subsection (C) is being deleted only because the twenty-day timeframe insert includes a knowledge qualifier, making subsection (C) redundant.

The Joint Utilities propose to remove reference to “significant public attention or media coverage.” This is not intended as a substantive change. It is just difficult to imagine a wildfire garnering significant public attention or media coverage which does not satisfy the more detailed conditions for reporting. In other words, to garner significant public attention or media coverage, a wildfire is always going to be relatively large. Therefore, it is unnecessary and potentially confusing to insert another channel for required reporting. Removing the language would remove any ambiguity on whether a very small fire mentioned in the local news would be a subject of required reporting.

Finally, while a redline suggestion is not made, further edits on the form of the report and the time it is due are needed. As currently drafted, the Joint Utilities are unclear what type of report would be required under proposed new subsection (3) (relating specifically to wildfire incidents), versus the revised subsection (renumbered as subsection (4)), which requires submission of Form FM 221. Both subsections have similar deadlines, suggesting that new proposed subsection (3) is satisfied through submission of FM 221. But renumbered subsection (4) still contains “in addition to” language, suggesting that the subsection (3) reporting requirement is not satisfied by submission of FM 221. The Joint Utilities suggest that this ambiguity should be resolved as part of finalizing the form that will be used to report fire incidents.

II. Public Safety Power Shutoff

Most of the proposed edits to the proposed PSPS rules center on clarifying the defined terms and then making consistent use of those defined terms in the body of the draft rules. In short, a term should not be defined if it is not used in the rules. Recognizing that the draft temporary rules are drawn, in large part, from language in PSPS rules in California, the Joint Utilities understand that there is a larger body of filings, etc., in the related California docket which may use certain terms, in certain contexts. Thus, some of the drafting errors in the California language may be a result of this larger historical context. Nonetheless, clarifying defined terms will improve the Oregon rules and make them easier to apply. The Joint Utilities’ redline proposes edits on a number of the defined terms, as follows:

- There is no need to define “Emergency Responder” if the term is not used. (And, as a practical matter, the term “Public Safety Partner” is the operative term that the rules use, with the first responder and emergency responder captured within that definition.)
- The term “Public Safety Partner” is a core term used frequently throughout the rules; adding water, wastewater, communications, and energy to this definition, however, makes the concept somewhat too broad for certain applications contemplated in the rules, where coordination with local government is the essential goal. The easy fix is

to make sure all essential services related to water, wastewater, communications, and energy are included in the definition for “Critical Facilities.”

- The term “Critical Infrastructure” can be removed because “critical infrastructure” is included within the definition of “Critical Facilities.”
- Adding definitions for “Electric Utility” and “Public Safety Power Shutoff” merely add clarity to whom the rules apply and for what purpose.
- Proposed edits to the “Vulnerable Populations” definition are substantive. Recognizing the policy goal to identify anyone who may be vulnerable, the current definition is extremely broad. By including older adults, children, and low income populations, expanding the already very broad definition used in California, the number of persons arguably meeting such a definition is probably a majority of the population, especially if one member of a household meeting such a definition then qualifies the customer account for categorization as associated with a member of a Vulnerable Population. Furthermore, the broad definitions are relatively open for interpretation, making it difficult for any party (whether an Electric Utility or a Public Safety Partner) to definitively and objectively identify members of a Vulnerable Population. These issues have been heavily debated in California. As a practical matter, experience there has shown that the best way to administer treatment of a “Vulnerable Population” is to allow individuals to choose how they would like to be treated. People can choose to identify and do not need to make any proof or otherwise qualify. Their election alone qualifies them. Thus, people who do not want to be treated as a member of a Vulnerable Population can choose not to make an election.

Because the majority of proposed edits in the body of the draft rules are merely intended to incorporate definitions and make consistent use of definitions, or otherwise simply remove redundant language by making a clarifying edit, the Joint Utilities will not address every redline proposal line-by-line. Instead, the Joint Utilities will offer comments on a few of the more substantive suggested edits.

With respect to the “Procedure for Notification,” the Joint Utilities propose adding clarity related to the timeframe for making communications to members of Vulnerable Populations.

With respect to the “Required Information in Notifications in Advance of and Directly Preceding a De-Energization Event,” the Joint Utilities propose clarifying edits consistent with the acknowledgement in subsection (1) that there needs to be flexibility to evaluate real-time and on-the-ground information. Therefore, the word “consideration” is suggested to replace the word “threshold,” which can be suggestive of a determinative outcome. Edits in subsection (1)(a) are intended to clarify the requirements to identify and share information about Critical Facilities. The edits in subsection (1)(b) are intended to clarify the type of education campaign which will be used for outreach. (The language in subsection (2)(b) is being deleted only because it is redundant to the previous section.)

With respect to the “Request to Delay De-Energization,” the Joint Utilities propose deleting this section. Because many other sections call for coordination and communication with Public Safety Partners, this section is simply redundant. If Public Safety Partners have concerns about the timing of an event, they will vocalize those concerns, as is done in California. Adding a separate section unnecessarily suggests a more adversarial tone, where a request must be formally made (and then potentially denied). The more iterative discussion about relative benefits and disadvantages, which will occur in the coordination contemplated under the rules, is a better process for the Electric Utility to receive and consider the concerns articulated by Public Safety Partners.

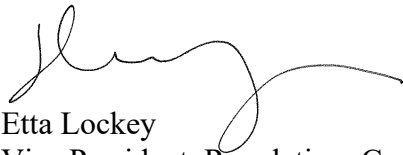
With respect to the “De-Energization of Transmission Lines,” the Joint Utilities propose deleting this section to remove ambiguity. A Public Safety Power Shutoff should be treated the same, regardless of the type of facilities at issue.

With respect to the “Reporting Requirements,” the Joint Utilities propose deleting any report related to a request to delay, for the same reasons as expressed above to delete the “Request to Delay De-Energization” section. Moreover, even if the “Request to Delay De-Energization” section were retained, a separate reporting prong remains unnecessary. The existing reporting structure used in California adequately captures the requirement to explain the justification for the event (which, therefore, is the grounds for not accommodating a request to delay). In addition, there is already a section requiring a description and evaluation of the engagement with Public Safety Partners.

CONCLUSION

The Joint Utilities appreciate the opportunity to comment on this rulemaking and looks forward to working with the Commission and parties going forward.

Sincerely,



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Enclosures

Attachment 1

Incident Reports

860-024-0050

Incident Reports

(1) As used in this rule:

(a) “Serious injury to person” means, in the case of an employee, an injury which results in hospitalization. In the case of a non-employee, “serious injury” means any contact with an energized high-voltage line, or any incident which results in hospitalization. Treatment in an emergency room is not hospitalization.

(b) “Serious injury to property” means:

(A) Damage to operator and non-operator property exceeding \$100,000; or

(B) In the case of a gas operator, damage to property exceeding \$5,000; or

(C) In the case of an electricity service supplier (ESS) as defined in OAR 860-038-0005, damage to ESS and non-ESS property exceeding \$100,000 or failure of ESS facilities that causes or contributes to a loss of energy to consumers; or

(D) Damage to property which causes a loss of service to over 500 customers (50 customers in the case of a gas operator) for over two hours (five hours for an electric operator serving less than 15,000 customers) except for electric service loss that is restricted to a single feeder line and results in an outage of less than four hours.

(2) Except as provided in section ~~(6)~~(5) of this rule, every reporting operator must give immediate notice by telephone, by facsimile, by electronic mail, or personally to the Commission, of incidents attended by:

(a) Loss of life or limb; or

(b) Serious injury to person or property occurring in Oregon upon the premises of or directly or indirectly arising from or connected with the maintenance or operation of a facility.

~~(3)~~(c) As soon as practicable following the event, but not more than 20 days ~~of~~ after knowledge ~~following the of an~~ event, all investor-owned electric utilities must report any event ~~fire-related incidents that are:~~

~~(a) The subject of significant public attention or media coverage; or~~ where the utility’s facilities are associated with the following ~~criteria~~ conditions:

(A) A self-propagating fire of material other than electrical and/or communication facilities; and

(B) The resulting fire traveled greater than one ten linear meters s from the ignition point; ~~and~~

~~(C) The utility has knowledge that the fire occurred.~~

~~(4)~~(3) Except as provided in section ~~(6)~~(5) of this rule, every reporting operator must, in addition to the notice given in sections (2) ~~and~~ ~~(3)~~ of this rule for an incident described in sections (2) ~~and~~ ~~(3)~~, report in writing to the Commission within 20 days of knowledge of the occurrence using Form 221 (FM 221) available on the Commission’s website. In the case of injuries to employees, a copy of the incident report form that is submitted to Oregon OSHA, Department of Consumer and Business Services, for reporting incident injuries, will normally suffice for a written report. In the case of a gas operator, copies of incident or leak reports submitted under 49 CFR Part 191 will normally suffice.

~~(5)~~(4) An incident report filed by a public or telecommunications utility in accordance with ORS 654.715 cannot be used as evidence in any action for damages in any suit or action arising out of any matter mentioned in the report.

~~(6)~~(5) A Peoples’ Utility District (PUD) is exempt from this rule if the PUD agrees, by signing an agreement, to comply voluntarily with the filing requirements set forth in sections (2) and

~~(4)~~(3).

~~(7)~~(6) Gas operators have additional incident and condition reporting requirements set forth in OAR 860-024-0020 and 860-024-0021.

Stat. Auth.: ORS Ch. 183, 654, 756, 757 & 759

Stats. Implemented: ORS 654.715, 654.720, 756.040, 756.105, 757.035, 757.039, 757.649, 759.036, 759.040 & 759.045

Hist.: PUC 164, f. 4-18-74, ef. 5-11-74 (Order No. 74-307); PUC 3-1981, f. & ef. 6-4-81 (Order No. 81-361); PUC 21-1985, f. & ef. 11-25-85 (Order No. 85-1130); PUC 12-1989, f. & cert. ef. 8-11-89 (Order No. 89-946); PUC 4-1992, f. & ef. 2-14-92 (Order No. 92-234); PUC 1-1998, f. & ef. 1-12-98 (Order No. 98-016); PUC 3-1999, f. & ef. 8-10-99 (Order No. 99-468); renumbered from OAR 860-028-0005 and 860-034-0570; PUC 23-2001, f. & ef. 10-11-01 (Order No. 01-839); PUC 9-2006, f. & ef. 9-28-06 (Order No. 06-547)

Public Safety Power Shutoff

860-XXX-XXXX

Definitions for Public Safety Power Shutoff

(1) “First Responder” refers to those individuals who, in the early stages of an incident, are responsible for the protection and preservation of life, property, evidence, and the environment; ~~including emergency response providers.~~ A “First Responder” is also often referred to as an “emergency responder.”

~~(2) “Emergency Responder” has the same meaning as “first responder.”~~

~~(3) “Emergency Response Provider” includes federal, state, and local governmental and nongovernmental public safety, fire, law enforcement, emergency response, emergency medical services providers (including hospital emergency facilities), and related personnel, agencies and authorities.~~

~~(4)~~(2) “Public Safety Partners” refers to first/~~emergency~~ responders at the local, state and federal level, ~~water, wastewater and communication service providers, energy providers (electricity, natural gas, fuels) including~~ County Emergency Managers, Oregon Office of Emergency Management, Oregon Department of Forestry, Oregon State Fire Marshal, and the Commission.

~~(5)~~(3) “Critical Facilities” refers to facilities and infrastructure that, within the ultimate discretion of the Electric Utility, are deemed essential to the public safety or could pose a threat to public safety if de-energized. ~~and that Critical Facilities may~~ require additional assistance and advance planning to ensure resiliency during de-energization events. Critical ~~Facilities and critical infrastructure~~ facilities may include the following: Emergency Services (e.g. police stations, fire stations, emergency operations centers); Government Facilities (e.g. schools, jails, and prisons); Healthcare and Public Health (e.g. public health departments, and medical facilities including hospitals, skilled nursing facilities, nursing homes, blood banks, health care facilities, dialysis centers, and hospice facilities); Key Grid Interdependencies (e.g. public and private utility facilities vital to maintaining or restoring normal service, including, but not limited to, interconnected publicly-owned utilities and electric cooperatives); Fueling Systems (e.g. fuel pumping and dispensing for vehicles or into containers for generators, electric vehicle charging stations); Water and Wastewater Systems (e.g. facilities associated with the provision of drinking water or processing of wastewater including facilities used to pump, divert, transport, store, treat, and deliver water or wastewater); Communications (e.g. communication carrier infrastructure including selective routers, central offices, head ends, cellular switches, remote terminals and cellular sites); and Chemical (e.g. facilities associated with the provision of manufacturing, maintaining, or distributing hazardous materials and chemicals).

~~(6) “Critical Infrastructure” see definition for “Critical Facilities”~~

~~(4)~~ “Electric Utility” is an electric investor-owned electric utility which may initiate a Public Safety Power Shutoff subject to these rules.

~~(5)~~ “Public Safety Power Shutoff” is a proactive de-energization of a portion of an Electric Utility’s electrical network, based on the forecasting of and measurement of extreme wildfire weather conditions, even though there may not be a current wildfire in the area of the portion of

the electrical network being de-energized.

~~(7)~~(6) “Vulnerable Populations” consists of individuals who have ected to identify to an electric utility as a person whose safety may be materially impacted by an electric de-energization event. A person electing to identify as a member of a vulnerable population may be a person with developmental or intellectual disabilities, physical disabilities, chronic conditions, injuries, or limited English proficiency ~~or who are non-English speaking,~~ an older adults, a children, a person ~~le~~ living in congregate care or institutionalized settings, ~~or those who are~~ low income, experiencing homelessness, ~~unhoused, or unsheltered,~~ or transportation disadvantaged, including, but not limited to, those who are dependent on public transit.

~~(8)~~(7) “ESF-12” refers to Emergency Support Function-12 and indicates the Commission’s role in supporting the State Office of Emergency Management for energy utilities issues during an emergency.

860-XXX-XXXX

Requirement to Notify

- (1) ~~The electric investor owned utilities~~If initiating a Public Safety Power Shutoff, an Electric Utility must:
 - (a) in partnership with local jurisdictions and the Oregon Office of Emergency Management and other emergency partners, develop and maintain comprehensive contact information for Public Safety Partners and Critical Facilities; and, critical infrastructure facilities and other critical facilities systems dependent on electric power.
 - (b) offer a method for a person to self-identify as a member of a Vulnerable Population and to the extent possible, in partnership with local jurisdictions, identify vulnerable populations and develop appropriate reasonable communication protocols that address the needs of those Vulnerable Populations.
- (2) ~~The electric investor owned utilities~~An Electric Utility must, ~~whenever possible, provide advance notification to all populations~~ make all reasonable efforts to provide advance notification to those populations potentially affected by a de-energization eventPublic Safety Power Shutoff. This includes, but is not limited to, Public Safety Partners, Critical Facilities and infrastructure, and Vulnerable Populations, ~~and jurisdictions that are not at threat of a utility-caused wildfire but may lose power as a result of de-energization elsewhere on the system.~~
- (3) Whenever possible, an Electric Utility should deliver priority notification should occur to the following entities, at a minimum: Public Safety Partners and Critical Facilities, using pre-designated contact information and procedures applicable to those entities. Other notifications should occur, to the extent feasible, on the timeline indicated below, as defined herein, and including adjacent local jurisdictions that may lose power as a result of de-energization. Notice to all other affected populations, may occur after the electric investor owned utilities has given priority notice; however, Vulnerable Populations may require additional notification streams. This guideline is not meant to be restrictive; utilities may provide priority notification to a broader subset of customers, e.g. certain critical facilities, to promote public safety.

860-XXX-XXXX

Procedure for Notification

(1) Every reasonable effort must be made by the Electric Utility electric investor-owned utilities to provide notice to Public Safety Partners of a potential de-energizationPublic Safety Power Shutoff as early as the Electric Utilityelectric investor-owned utilities reasonably believes de-energization is likely. In addition, an Electric Utilitythe electric investor-owned utilities must provide notice when a decision to de-energize is made, at the beginning of a de-energization event, when re-energization begins and when re-energization is complete. The An Electric Utility electric investor-owned utilities should, whenever possible, adhere to the following minimum notification timeline:

(a) 48-72 hours in advance of anticipated a forecasted de-energization event: notification of Public Safety Partners and the Commission's ESF-12 Liaison/priority notification entities;

(b) 24-48 hours in advance of a forecastedanticipated de-energization event: notification of all other affected customers/populationsCritical Facilities;

~~(b)~~(c) 4-24 hours in advance of a forecasted de-energization event, if forecasts indicate that a de-energization event is highly likely, then notification to all customers, including Vulnerable Populations;

~~(e)~~(d) 1-4 hours in advance of anticipated de-energization, if possible: notification of the decision to implement a de-energization event to all affected customers/populations;

~~(d)~~(e) When de-energization is initiated: notification of all affected customers/populations;

~~(e)~~(f) Immediately before re-energization begins: notification of all affected customers/populations;

~~(f)~~(g) When re-energization is complete: notification of all affected customers/populations.

(2)(a) The An Electric Utilityelectric investor-owned utilities, as the entity with the most knowledge of and jurisdiction to call a de-energization event and subsequent re-energizationits electrical operations, retains ultimate responsibility for development of the communication strategy and notification in advance of, during and after a de-energization event.

(b) An Electric UtilityThe electric investor-owned utilities must work with the goal of integrating into and leveraging existing outreach and notification systems wherever reasonably possible, rather than creating duplicative and potentially conflicting systems to those employed by local jurisdictions/emergency/first responders.

860-XXX-XXXX

Required Information in Notifications in Advance of and Directly Preceding a De-Energization Event

(1) In advance of a de-energization event, an Electric Utilityan electric investor-owned utility must clearly articulate thresholds for strong wind events as well as the conditions considerations that define the Electric Utility evaluates to determine whether there is “an extreme fire hazard” in a particular area and a potential for a Public Safety Power Shutoff event. ~~(e.g. humidity, fuel dryness, temperature)~~ that the electric investor-owned utility evaluates in considering whether to de-energize. This information may vary for different jurisdictions and topographies. ~~;~~ however, the information must be provided to and be readily available to public safety partners and the public. An Electric Utility isThe electric investor-owned utilities are afforded discretion to evaluate real-time and on-the-ground information in determining whether to de-energize; adoption of thresholds considerations is not determinative of de-energization.

(a) To aid in preparation, the electric investor-owned utilities must provide to Public Safety Partners in advance of wildfire season, if requested, relevantgeographic information system data,

~~including identification~~ the type and location of Critical Facilities that would be impacted by a potential Public Safety Power Shutoff and circuits, and the number of customers with medical certificates who -medical-baseline-customersthat have registered with the Electric Utility and are located within the area that would be impacted by a potential Public Safety Power Shutoff to local jurisdictions in advance of wildfire season. In addition, the Electric Utility utilities must provide, if requested, ~~operational~~ coordination with Public Safety Partners to ensure such partners have not only the information but also the coordination with the Electric Utility utilities necessary to prepare for de-energization.

(b) ~~Each Electric Utility The electric investor-owned utilities, must, in consultation with the Commission, the Office of Emergency Management, the Oregon Department of Forestry and the Oregon State Fire Marshal, ensure the development and execution of a its statewide~~ Public Safety Power Shut-off education campaign, that provides education tailored to the needs of stakeholders, including Vulnerable Populations, in order to make citizens aware of how to prepare for and obtain information during a prolonged loss of power, including as a result of de-energization Public Safety Power Shutoff. An Electric Utility will provide the education campaign materials to the Commission, the Office of Emergency Management, the Oregon Department of Forestry and the Oregon State Fire Marshal. The electric investor-owned utilities, in coordination with the above-named agencies, must measure effectiveness of education and outreach efforts and adjust efforts accordingly.

(c) In preparation for the 2021 fire season, an Electric Utility utilities must work with local and state Public Safety Partners to endeavor to utilize develop an understanding of reverse 9-1-1 capabilities and identify preferred or most effective public notification tools (e.g., local radio stations, TV, social media). In order to allow jurisdictions with public alerting authority to send timely and appropriate messages to populations potentially impacted by a de-energization event, an Electric Utility the utilities must develop Common Alerting Protocol compliant messages and protocols for use by the designated alert authorities. Whether local jurisdictions choose to utilize their Public Alert and Warning system to notify the public of a de-energization event is at their discretion.

(2) ~~An Electric Utility The electric investor-owned utilities~~ must convey to Public Safety Partners, at the time of first notification preceding a ~~de-energization event~~ Public Safety Power Shutoff, information regarding the upcoming de-energization, including estimated start time of the event, estimated duration of the event, and estimated time to full restoration.

(a) ~~For the 2021 wildfire season, the electric investor-owned utilities~~ An Electric Utility must, at the time of first notification preceding a de-energization event, make available a Geographic Information System shapefile via a secure data transfer process depicting the most accurate and specific information possible regarding the boundaries of the area subject to de-energization to all public safety partners whose jurisdictions or service areas that will be impacted by the de-energization event, including adjacent jurisdictions or service areas that could lose power as a result of de-energization in a high fire threat districts subject to the Public Safety Power Shutoff.

(b) ~~The electric investor-owned utilities must partner with local public safety partners to communicate with all other customers that a de-energization event is possible, the estimated start date and time of the de-energization event, the estimated length of the de-energization event, which may be communicated as a range, and the estimated time to power restoration, which again, may be communicated as a range. Communications should state when the customer can next expect communication about the de-energization event. Communication, must answer five key recipient questions: (1) Who is the source of the warning; (2) What is the threat; (3) Does this affect my location; (4) What should I do; and (5) What is the expected duration of the event. Communications~~

~~must also point customers towards education and outreach materials disseminated in advance of the 2021 wildfire season.~~

~~(e)(b) In addition to the notifications set forth above, an Electric Utility~~ The electric investor-owned utilities ~~must provide up-to-date information, including a depiction of the boundary of the de-energization event~~ Public Safety Power Shutoff, ~~on their websites' homepage and a dedicated Public Safety Power Shut-off webpage regarding the de-energization event (with a clearly labelled link on the Electric Utility's website homepage).~~ The electric investor-owned utilities, in partnership with local public safety partners, must establish and communicate The website must include a 24-hour means of contact that customers may use to ask questions and/or seek information.

860-XXX-XXXX

Identification of Customer Groups

(1) ~~As soon as reasonably practicable, an Electric Utility~~ The electric investor-owned utilities ~~must work with local and county officials~~ Public Safety Partners and Critical Facilities to identify appropriate ~~emergency/first responder 24-hour points of contact, including secondary contacts, and, if possible, tertiary contacts. This may include local government points of contact for jurisdictions that share first responder resources. The electric investor-owned utilities must identify 24-hour contact points and must identify secondary contacts at a minimum and tertiary contacts if possible.~~ The electric investor-owned utilities An Electric Utility ~~must also identify primary and secondary means of communication for each contact.~~

(2) ~~An Electric Utility~~ The electric investor-owned utilities ~~must provide to Public Safety Partners and Critical Facilities utility personnel~~ the Electric Utility's 24-hour points of contact, including secondary and tertiary contacts ~~and primary and secondary means of communication to affected local jurisdictions/first responders.~~

(3) Consistent with ORS 758.013, utilities shall file the emergency contact information with the Commission.

(4) ~~An Electric Utility~~ The electric investor-owned utilities ~~must, in addition to developing their own list of Critical Facilities and critical infrastructure based on the adopted definition, work in coordination with first/emergency responders and local governments~~ Public Safety Partners to identify ~~other potential Critical Facilities within areas potentially subject to a Public Safety Power Shutoff, the electric investor-owned utilities' service territories. The electric investor-owned utilities must work together with operators of critical facilities and critical infrastructure to identify 24-hour points of contact and at a minimum, secondary points of contact, including preferred methods of communication.~~

(5) The Commission acknowledges that identification of all persons who may be members of Vulnerable P ~~individuals and~~ populations is a goal that may not be fully achievable, even with assistance of local jurisdictions. An Electric Utility must, however, ~~the utilities must take all reasonable steps within the boundaries of the law towards that goal in order to protect the safety~~ make reasonable attempts to outreach to members of Vulnerable P ~~populations to facilitate self-identification and subsequent additional notification to members of Vulnerable Populations in the event of a Public Safety Power Shutoff.~~

860-XXX-XXXX

Methods for Communicating De-Energization Event with the Public

(1) An Electric Utility~~The electric investor-owned utilities~~ must, in coordination with Public Safety Partners, develop notification strategies for all customer groups affected by Public Safety Power Shutoff~~de-energization, and the electric investor-owned utilities must partner with local and state public safety partners, whenever possible, to develop notification strategies.~~ To be effective, notifications should be delivered in multiple formats across several media channels, both to increase the potential a message successfully reaches an impacted population and to provide a sense of corroboration that will encourage individuals to take protective actions. Customer Subject to customer preference, notifications should include, but are not limited to, telephonic notification, text message notification, social media advisories, emails, and messages to agencies that service disadvantaged communities within an impacted area~~Vulnerable Populations~~, to allow them-such agencies to amplify any pertinent warnings. Communication methods must consider the geographic and cultural demographics of affected areas (e.g. broadband access, languages prevalent within the utility's service territories, considerations for those who are vision or hearing impaired.).

(2) An Electric Utility~~The electric investor-owned utilities~~ must develop, in coordination with Public Safety Partners, a strategy for how communication will occur with affected customers once de-energization has begun and during re-energization, recognizing that communication channels may be restricted due to the loss of power. ~~The electric investor-owned utilities should develop this strategy in coordination with public safety partners.~~

860-XXX-XXXX

Coordination with Public Safety Partners Before and During a De-Energization Event

(1) In coordinating with Public Safety Partners, as described above, ~~The electric investor-owned utilities will be responsible for contacting local public safety officials in impacted jurisdictions prior to and during a de-energization event. The electric investor-owned utilities must communicate an impending de-energization event to local officials and the Commission's ESF-12 Liaison. The electric investor-owned utilities an Electric Utility must work with public safety partners should attempt~~ to disseminate all information in formats and through processes that are used by Public Safety Partners during other emergencies. ~~The electric investor-owned utilities must partner with local and state public safety partners to develop notification strategies for all customer groups or otherwise that~~ comport with the best practices preferred by Public Safety Partners.

(2) An Electric Utility~~Electric investor-owned utilities~~ must work to continually improve communication and outreach effectiveness by partnering with Public Safety Partners~~local jurisdictions~~, the Commission, the Oregon Office of Emergency Management, the Oregon Department of Forestry the Oregon State Fire Marshal to develop a comprehensive, coordinated and cohesive notification framework including, but not limited to, the Electric Utility~~electric investor-owned utilities~~ providing notification to Public Safety Partners, to the extent they are willing and able, providing secondary or supplemental notification to the general public. ~~Electric investor-owned utilities retains responsibility to ensure notification of affected customers.~~

860-XXX-XXXX

Coordination with Emergency Response Centers and Incident Command Systems

(1) If requested by ~~the local jurisdiction~~ the Public Safety Partner leading a local emergency operation center, ~~an Electric Utility~~ the electric investor-owned utilities should endeavor to embed a liaison officer at the ~~local emergency operation~~ center. When requested, ~~the~~ an Electric Utility must embed a liaison officer at the State Emergency Coordination Center for the purpose of assessing and integrating wildfire threat data for decision-making. Once it has delivered a notification of a potential Public Safety Power Shutoff, and continuously until an event has ended or until conditions have subsided so that the notice is de-activated, an Electric Utility ~~The electric investor-owned utilities~~ should have a designated lead with decision-making authority located at the utility's emergency operations center with whom embedded liaisons can communicate in real-time to obtain the most up-to-date information. This requirement does not preclude the Electric Utility utilities from developing a centralized communication structure that is amenable to both the Electric Utility utility, the state ESF-12 liaison and local jurisdictions to provide real-time coordination and situation awareness.

860-XXX-XXXX

Request to Delay De-Energization

~~(1) The electric investor-owned utilities should address requests for a de-energization delay on a case-by-case basis when requests are made from public safety partners. The electric investor-owned utilities retain ultimate authority to grant a delay and responsibility to determine how a delay in de-energization impacts public safety.~~

~~(2) If the utility receives a request to delay de-energization, it must notify the Commission ESF-12 liaison of the request, the reason for the request, the utility's decision and justification for the decision.~~

860-XXX-XXXX

De-Energization of Transmission Lines

~~(1) The electric investor-owned utilities must design interim protocols for the de-energization of transmission lines based upon the impacts to populations across affected jurisdictions including, but not limited to, publicly owned utilities/electric cooperatives, adjacent jurisdictions and small/multi-jurisdictional utilities and critical facilities interconnected at the transmission level. The utility must solicit input from stakeholders in developing these protocols.~~

~~(2) In the event of transmission line de-energization, additional coordination may be required with the Oregon Office of Emergency Management via the Commission's ESF-12 liaison, the Oregon Department of Forestry, the Oregon State Fire Marshall, local jurisdictional public safety partners and other impacted partners. The electric investor-owned utilities must comply with Federal Energy Regulatory Commission and North American Electric Reliability Corporation reliability standards.~~

860-XXX-XXXX

Reporting Requirements

(1) No more than 10 days following a ~~deenergization event~~Public Safety Power Shutoff, the ~~electric investor-owned utilities~~Electric Utility must file a report with Commission with the following information:

(a) Decision criteria leading to de-energization, including an evaluation of alternatives to de-energization that were considered, and mitigation measures used to decrease the risk of utility-caused wildfire in the de-energized area;

(b) A copy of all notifications, the timing of notifications, the methods of notifications, and who made the notifications (the Electric Utility or local Public Safety Partners);

~~(c) An accounting of any requests to delay de-energization, reason for the request, ultimate decision, and justification for that decision.~~

(d) If the utility ~~fails to~~does not provide advanced notification, or notification according to the minimum timelines set forth in these Guidelines, an explanation of the circumstances ~~that resulted in such failure;~~

(e) A description and evaluation of engagement with ~~local and state~~Public Safety Partners in providing advanced education and outreach and notification during the de-energization event;

~~(f) For members of Vulnerable Populations, a narrative of how those individuals or communities were notified, how notification was verified, who provided the notifications (Electric Utility or Public Safety Partner), and any special accommodations provided. For those customers where, including whether positive or affirmative notification was attempted, an accounting of the customers, the number of notification attempts made, the timing of attempts, who made the notification attempt (utility or public safety partner), and the number of customers for whom positive notification was achieved;~~

~~(g) For those customers identified as vulnerable, a narrative of how those individuals or communities were notified, how notification was verified, who provided the notifications (utility or public safety partner), and any special accommodations provided.~~

(h) A description of how sectionalization, i.e. separating loads within a circuit, was considered and implemented and the extent to which it impacted the size and scope of the de-energization event;

(i) An explanation of how the Electric Utility determined ~~that the benefit of de-energization outweighed potential public safety risks;~~de-energization should occur;

(j) The timeline for power restoration (re-energization,) in addition to the steps taken to restore power;

(k) Lessons learned from the de-energization event.

~~(2) In addition to de-energization reports, the electric investor-owned utilities are required to file reports on de-energization lessons learned no later than December 31, 2021. The reports must include a copy of all educational campaigns and outreach made in advance of the 2021 wildfire season and an evaluation of their effectiveness.~~

Attachment 2

Incident Reports

860-024-0050

Incident Reports

(1) As used in this rule:

(a) “Serious injury to person” means, in the case of an employee, an injury which results in hospitalization. In the case of a non-employee, “serious injury” means any contact with an energized high-voltage line, or any incident which results in hospitalization. Treatment in an emergency room is not hospitalization.

(b) “Serious injury to property” means:

(A) Damage to operator and non-operator property exceeding \$100,000; or

(B) In the case of a gas operator, damage to property exceeding \$5,000; or

(C) In the case of an electricity service supplier (ESS) as defined in OAR 860-038-0005, damage to ESS and non-ESS property exceeding \$100,000 or failure of ESS facilities that causes or contributes to a loss of energy to consumers; or

(D) Damage to property which causes a loss of service to over 500 customers (50 customers in the case of a gas operator) for over two hours (five hours for an electric operator serving less than 15,000 customers) except for electric service loss that is restricted to a single feeder line and results in an outage of less than four hours.

(2) Except as provided in section (5) of this rule, every reporting operator must give immediate notice by telephone, by facsimile, by electronic mail, or personally to the Commission, of incidents attended by:

(a) Loss of life or limb; or

(b) Serious injury to person or property occurring in Oregon upon the premises of or directly or indirectly arising from or connected with the maintenance or operation of a facility.

(c) As soon as practicable following the event, but not more than 20 days after knowledge of an event, all investor-owned electric utilities must report any event where the utility’s facilities are associated with the following conditions:

(A) A self-propagating fire of material other than electrical and/or communication facilities; and

(B) The resulting fire traveled greater than ten linear meters from the ignition point;

(3) Except as provided in section (5) of this rule, every reporting operator must, in addition to the notice given in section (2) of this rule for an incident described in section (2), report in writing to the Commission within 20 days of knowledge of the occurrence using Form 221 (FM 221) available on the Commission’s website. In the case of injuries to employees, a copy of the incident report form that is submitted to Oregon OSHA, Department of Consumer and Business Services, for reporting incident injuries, will normally suffice for a written report. In the case of a gas operator, copies of incident or leak reports submitted under 49 CFR Part 191 will normally suffice.

(4) An incident report filed by a public or telecommunications utility in accordance with ORS 654.715 cannot be used as evidence in any action for damages in any suit or action arising out of any matter mentioned in the report.

(5) A Peoples’ Utility District (PUD) is exempt from this rule if the PUD agrees, by signing an agreement, to comply voluntarily with the filing requirements set forth in sections (2) and (3).

(6) Gas operators have additional incident and condition reporting requirements set forth in OAR 860-024-0020 and 860-024-0021.

Stat. Auth.: ORS Ch. 183, 654, 756, 757 & 759

Stats. Implemented: ORS 654.715, 654.720, 756.040, 756.105, 757.035, 757.039, 757.649, 759.036, 759.040 & 759.045

Hist.: PUC 164, f. 4-18-74, ef. 5-11-74 (Order No. 74-307); PUC 3-1981, f. & ef. 6-4-81 (Order No. 81-361); PUC 21-1985, f. & ef. 11-25-85 (Order No. 85-1130); PUC 12-1989, f. & cert. ef. 8-11-89 (Order No. 89-946); PUC 4-1992, f. & ef. 2-14-92 (Order No. 92-234); PUC 1-1998, f. & ef. 1-12-98 (Order No. 98-016); PUC 3-1999, f. & ef. 8-10-99 (Order No. 99-468); renumbered from OAR 860-028-0005 and 860-034-0570; PUC 23-2001, f. & ef. 10-11-01 (Order No. 01-839); PUC 9-2006, f. & ef. 9-28-06 (Order No. 06-547)

Public Safety Power Shutoff

860-XXX-XXXX

Definitions for Public Safety Power Shutoff

- (1) “First Responder” refers to those individuals who, in the early stages of an incident, are responsible for the protection and preservation of life, property, evidence, and the environment. A “First Responder” is also often referred to as an “emergency responder.”
- (2) “Public Safety Partners” refers to first responders at the local, state and federal level, including County Emergency Managers, Oregon Office of Emergency Management, Oregon Department of Forestry, Oregon State Fire Marshal, and the Commission.
- (3) “Critical Facilities” refers to facilities and infrastructure that, within the ultimate discretion of the Electric Utility, are deemed essential to the public safety or could pose a threat to public safety if de-energized. Critical Facilities may require additional assistance and advance planning to ensure resiliency during de-energization events. Critical Facilities may include the following: Emergency Services (e.g. police stations, fire stations, emergency operations centers); Government Facilities (e.g. schools, jails, and prisons); Healthcare and Public Health (e.g. public health departments, and medical facilities including hospitals, skilled nursing facilities, nursing homes, blood banks, health care facilities, dialysis centers, and hospice facilities); Key Grid Interdependencies (e.g. public and private utility facilities vital to maintaining or restoring normal service, including, but not limited to, interconnected publicly-owned utilities and electric cooperatives); Fueling Systems (e.g. fuel pumping and dispensing for vehicles or into containers for generators, electric vehicle charging stations); Water and Wastewater Systems (e.g. facilities associated with the provision of drinking water or processing of wastewater including facilities used to pump, divert, transport, store, treat, and deliver water or wastewater); Communications (e.g. communication carrier infrastructure including selective routers, central offices, head ends, cellular switches, remote terminals and cellular sites); and Chemical (e.g. facilities associated with the provision of manufacturing, maintaining, or distributing hazardous materials and chemicals).
- (4) “Electric Utility” is an electric investor-owned electric utility which may initiate a Public Safety Power Shutoff subject to these rules.
- (5) “Public Safety Power Shutoff” is a proactive de-energization of a portion of an Electric Utility’s electrical network, based on the forecasting of and measurement of extreme wildfire weather conditions, even though there may not be a current wildfire in the area of the portion of the electrical network being de-energized.
- (6) “Vulnerable Populations” consists of individuals who have elected to identify to an electric utility as a person whose safety may be materially impacted by an electric de-energization event. A person electing to identify as a member of a vulnerable population may be a person with developmental or intellectual disabilities, physical disabilities, chronic conditions, injuries, or limited English proficiency, an older adult, a child, a person living in congregate care or institutionalized settings, low income, experiencing homelessness, or transportation disadvantaged, including, but not limited to, those who are dependent on public transit.

(7) “ESF-12” refers to Emergency Support Function-12 and indicates the Commission’s role in supporting the State Office of Emergency Management for energy utilities issues during an emergency.

860-XXX-XXXX

Requirement to Notify

(1) If initiating a Public Safety Power Shutoff, an Electric Utility must:

(a) in partnership with local jurisdictions and the Oregon Office of Emergency Management, develop and maintain comprehensive contact information for Public Safety Partners and Critical Facilities; and

(b) offer a method for a person to self-identify as a member of a Vulnerable Population and develop reasonable communication protocols that address the needs of Vulnerable Populations.

(2) An Electric Utility must, make all reasonable efforts to provide advance notification to those populations affected by a Public Safety Power Shutoff. This includes, but is not limited to, Public Safety Partners, Critical Facilities, and Vulnerable Populations.

(3) Whenever possible, an Electric Utility should deliver priority notification to Public Safety Partners and Critical Facilities, using pre-designated contact information and procedures applicable to those entities. Other notifications should occur, to the extent feasible, on the timeline indicated below. Vulnerable Populations may require additional notification streams.

860-XXX-XXXX

Procedure for Notification

(1) Every reasonable effort must be made by the Electric Utility to provide notice to Public Safety Partners of a potential Public Safety Power Shutoff as early as the Electric Utility reasonably believes de-energization is likely. In addition, an Electric Utility must provide notice when a decision to de-energize is made, at the beginning of a de-energization event, when re-energization begins and when re-energization is complete. An Electric Utility should, whenever possible, adhere to the following minimum notification timeline:

(a) 48-72 hours in advance of a forecasted de-energization event: notification of Public Safety Partners and the Commission’s ESF-12 Liaison;

(b) 24-48 hours in advance of a forecasted de-energization event: notification of all other Critical Facilities;

(c) 4-24 hours in advance of a forecasted de-energization event, if forecasts indicate that a de-energization event is highly likely, then notification to all customers, including Vulnerable Populations;

(d) 1-4 hours in advance of anticipated de-energization, if possible: notification of the decision to implement a de-energization event to all affected customers/populations;

(e) When de-energization is initiated: notification of all affected customers/populations;

(f) Immediately before re-energization begins: notification of all affected customers/populations;

(g) When re-energization is complete: notification of all affected customers/populations.

(2)(a) An Electric Utility, as the entity with the most knowledge of its electrical operations, retains ultimate responsibility for development of the communication strategy and notification in advance

of, during and after a de-energization event.

(b) An Electric Utility must work with the goal of integrating into and leveraging existing outreach and notification systems wherever reasonably possible, rather than creating duplicative and potentially conflicting systems to those employed by local jurisdictions/emergency/first responders.

860-XXX-XXXX

Required Information in Notifications in Advance of and Directly Preceding a De-Energization Event

(1) In advance of a de-energization event, an Electric Utility must clearly articulate considerations that the Electric Utility evaluates to determine whether there is “an extreme fire hazard” in a particular area and a potential for a Public Safety Power Shutoff event. This information may vary for different jurisdictions and topographies. An Electric Utility is afforded discretion to evaluate real-time and on-the-ground information in determining whether to de-energize; adoption of considerations is not determinative of de-energization.

(a) To aid in preparation, the electric investor-owned utilities must provide to Public Safety Partners in advance of wildfire season, if requested, the type and location of Critical Facilities that would be impacted by a potential Public Safety Power Shutoff and the number of customers with medical certificates who have registered with the Electric Utility and are located within the area that would be impacted by a potential Public Safety Power Shutoff. In addition, the Electric Utility must provide, if requested, coordination with Public Safety Partners to ensure such partners have not only the information but also the coordination with the Electric Utility necessary to prepare for de-energization.

(b) Each Electric Utility must develop and execute its Public Safety Power Shutoff education campaign, that provides education tailored to the needs of stakeholders, including Vulnerable Populations, to make citizens aware of how to prepare for and obtain information during a Public Safety Power Shutoff. An Electric Utility will provide the education campaign materials to the Commission, the Office of Emergency Management, the Oregon Department of Forestry and the Oregon State Fire Marshal.

(c) In preparation for the 2021 fire season, an Electric Utility must work with local and state Public Safety Partners to endeavor to utilize reverse 9-1-1 capabilities and identify preferred or most effective public notification tools (e.g., local radio stations, TV, social media). In order to allow jurisdictions with public alerting authority to send timely and appropriate messages to populations potentially impacted by a de-energization event, an Electric Utility must develop Common Alerting Protocol compliant messages and protocols for use by the designated alert authorities. Whether local jurisdictions choose to utilize their Public Alert and Warning system to notify the public of a de-energization event is at their discretion.

(2) An Electric Utility must convey to Public Safety Partners, at the time of first notification preceding a Public Safety Power Shutoff, information regarding the upcoming de-energization, including estimated start time of the event, estimated duration of the event, and estimated time to full restoration.

(a) An Electric Utility must, at the time of first notification preceding a de-energization event, make available a Geographic Information System shapefile via a secure data transfer process depicting the boundaries of the area subject to de-energization to all public safety partners whose jurisdictions or service areas that will be subject to the Public Safety Power Shutoff.

(b) In addition to the notifications set forth above, an Electric Utility must provide up-to-date

information, including a depiction of the boundary of the Public Safety Power Shutoff, on a dedicated Public Safety Power Shut-off webpage (with a clearly labelled link on the Electric Utility's website homepage). The website must include a 24-hour means of contact that customers may use to ask questions and/or seek information.

860-XXX-XXXX

Identification of Customer Groups

(1) As soon as reasonably practicable, an Electric Utility must work with Public Safety Partners and Critical Facilities to identify appropriate 24-hour points of contact, including secondary contacts, and, if possible, tertiary contacts. An Electric Utility must also identify primary and secondary means of communication for each contact.

(2) An Electric Utility must provide to Public Safety Partners and Critical Facilities the Electric Utility's 24-hour points of contact, including secondary and tertiary contacts and primary and secondary means of communication.

(3) Consistent with ORS 758.013, utilities shall file the emergency contact information with the Commission.

(4) An Electric Utility must, in addition to developing their own list of Critical Facilities, work in coordination with Public Safety Partners to identify other potential Critical Facilities within areas potentially subject to a Public Safety Power Shutoff.

(5) The Commission acknowledges that identification of all persons who may be members of Vulnerable Populations is a goal that may not be fully achievable, even with assistance of local jurisdictions. An Electric Utility must, however, make reasonable attempts to outreach to members of Vulnerable Populations to facilitate self-identification and subsequent additional notification to members of Vulnerable Populations in the event of a Public Safety Power Shutoff.

860-XXX-XXXX

Methods for Communicating De-Energization Event with the Public

(1) An Electric Utility must, in coordination with Public Safety Partners, develop notification strategies for all customer groups affected by Public Safety Power Shutoff. To be effective, notifications should be delivered in multiple formats across several media channels, both to increase the potential a message successfully reaches an impacted population and to provide a sense of corroboration that will encourage individuals to take protective actions. Subject to customer preference, notifications should include, but are not limited to, telephonic notification, text message notification, social media advisories, emails, and messages to agencies that service Vulnerable Populations, to allow such agencies to amplify any pertinent warnings. Communication methods must consider the geographic and cultural demographics of affected areas (e.g. broadband access, languages prevalent within the utility's service territories, considerations for those who are vision or hearing impaired.).

(2) An Electric Utility must develop, in coordination with Public Safety Partners, a strategy for how communication will occur with affected customers once de-energization has begun and during re-energization, recognizing that communication channels may be restricted due to the loss of power.

860-XXX-XXXX

Coordination with Public Safety Partners Before and During a De-Energization Event

(1) In coordinating with Public Safety Partners, as described above, an Electric Utility should attempt to disseminate all information in formats and through processes that are used by Public Safety Partners during other emergencies or otherwise comport with the best practices preferred by Public Safety Partners.

(2) An Electric Utility must work to continually improve communication and outreach effectiveness by partnering with Public Safety Partners, the Commission, the Oregon Office of Emergency Management, the Oregon Department of Forestry the Oregon State Fire Marshal to develop a comprehensive, coordinated and cohesive notification framework including, but not limited to, the Electric Utility providing notification to Public Safety Partners, to the extent they are willing and able, providing secondary or supplemental notification to the general public.

860-XXX-XXXX

Coordination with Emergency Response Centers and Incident Command Systems

(1) If requested by the Public Safety Partner leading a local emergency operation center, an Electric Utility should endeavor to embed a liaison officer at the center. When requested, an Electric Utility must embed a liaison officer at the State Emergency Coordination Center for the purpose of assessing and integrating wildfire threat data for decision-making. Once it has delivered a notification of a potential Public Safety Power Shutoff, and continuously until an event has ended or until conditions have subsided so that the notice is de-activated, an Electric Utility should have a designated lead with decision-making authority located at the utility's emergency operations center with whom embedded liaisons can communicate in real-time to obtain the mostup-to-date information. This requirement does not preclude the Electric Utility from developing acentralized communication structure that is amenable to both the Electric Utility, the state ESF-12 liaison and local jurisdictions to provide real-time coordination and situation awareness.

860-XXX-XXXX

Reporting Requirements

- (1) No more than 10 days following a Public Safety Power Shutoff, the Electric Utility must file a report with Commission with the following information:
 - (a) Decision criteria leading to de-energization, including an evaluation of alternatives to de-energization that were considered, and mitigation measures used to decrease the risk of utility-caused wildfire in the de-energized area;
 - (b) A copy of all notifications, the timing of notifications, the methods of notifications, and who made the notifications (the Electric Utility or local Public Safety Partners);
 - (c)
 - (d) If the utility does not provide advanced notification, or notification according to the minimum timelines set forth in these Guidelines, an explanation of the circumstances
 - (e) A description and evaluation of engagement with Public Safety Partners in providing advanced education and outreach and notification during the de-energization event;
 - (f) For members of Vulnerable Populations, a narrative of how those individuals or communities were notified, how notification was verified, who provided the notifications (Electric Utility or Public Safety Partner), and any special accommodations provided, including whether positive or affirmative notification was attempted;
 - (g)
 - (h) A description of how sectionalization, i.e. separating loads within a circuit, was considered and implemented and the extent to which it impacted the size and scope of the de-energization event;
 - (i) An explanation of how the Electric Utility determined de-energization should occur;
 - (j) The timeline for power restoration (re-energization,) in addition to the steps taken to restore power;
 - (k) Lessons learned from the de-energization event.