



Oregon

Kate Brown, Governor

Department of Forestry

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

Dear Commissioners:

Thank you for allowing us the opportunity to provide input to your scoping survey questions regarding AR 638 and Wildfire Mitigation Plans. The Oregon Department of Forestry considers OPUC one of many partners in the complete and coordinated fire protection system in Oregon. Please find below our responses to the survey questions.

Question 1: What are your objectives/expectations for wildfire mitigation?

ODF's objectives and expectations for wildfire mitigation begin with our policy as stated in ORS 477.005 which is the preservation of forests and the conservation of forest resources through the prevention and suppression of forest fires. More specifically, as related to AR 638, reduce ignitions through best management practices and quick response. In so doing, actively perform ignition mitigation in priority high risk areas to reduce wildfire risk.

Question 2: What are the components of a comprehensive electric utility WMP e.g., what does the table of contents look like?

Components of a comprehensive WMP should build off of existing operational plans and include the following: Preparedness; Fire Risk; Equipment Durability and Maintenance; Operational Practices; Recovery; Mitigation Responses; and Communication (internal and external). The Plan should be considered a living document that includes sub-headings and appendices that grow and change over time. The Plan should have a "Contacts" appendix that includes critical jurisdictional contacts such as rural fire districts, state and federal wildland fire protection offices, county fire defense board chiefs, emergency management offices, etc. Finally, within operational practices, there should be something that addresses access to remote locations and how fire suppression activities can be safely performed in these areas.

Question 3: What are your priorities and/or what are the most urgent issues to tackle before next fire season?

From a fire protection perspective, priorities to be addressed before the 2021 fire season center on communication. Utilities and jurisdictional fire agencies must come together to discuss elevated fire risk communication and incident dispatch coordination when faults are detected in the system. Perhaps the most critical piece is sharing key contacts when a phone call needs to occur by either party. Internally, utility personnel, regardless of position, must communicate concerns when observed. For instance, when line workers discover vegetation management issues they must report it to vegetation management personnel and assure that the issue is resolved.

Priority number 2 must be setting and following thresholds when the system could be compromised by weather. The US Forest Service has developed a wildfire potential index that is generated daily and even hourly that has been used in some California utility companies predictive services branches. Utilities can use this application or a combination of ERC (Energy Release Component) + WIND metric to determine thresholds. A communication plan must again be part of the equation that illustrates how and when power shutoffs would occur when these thresholds are met.

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

Will rulemaking include language on repercussions if elements of the plan are not followed whether a fire occurs or not? Liability? Penalties?

What are your other comments or concerns?

Thank you again for allowing us to provide comment. We look forward to ongoing conversations that lead to the prevention of human-caused wildfires as they relate to the management of our public utilities.

Sincerely,

A handwritten signature in black ink, appearing to read "Tim Holschbach", with a long horizontal flourish extending to the right.

Tim Holschbach
Fire Prevention and Policy Manager
Oregon Department of Forestry