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July 20, 2021

Via: Electronic Filing

Public Utility Commission of Oregon
Attention: Filing Center
PO Box 1088
Salem, OR 97308-1088

RE AR 638 Risk-Based Wildfire Protection Plan – PGE Comments Regarding System Hardening (Inspections)

Dear Filing Center,

Portland General Electric Company (“PGE”) appreciates the opportunity to provide comments in AR 638. During the June 29, 2021 Public Utility Commission of Oregon (OPUC or Commission) AR 638 Vegetation and System Hardening Workshop, PGE presented information and recommendations concerning wildfire mitigation inspections. Pursuant to OPUC staff’s request, provided below are written comments which summarize PGE’s recommendations.

1. Wildfire Mitigation Inspections

In support of wildfire mitigation, certain utilities (including PGE) have opted to perform inspections of overhead electrical facilities located in high wildfire risk areas, such as those identified in PGE’s risk analysis process. PGE’s schedule for such inspections is determined based on risk and may be performed on a more frequent basis than time-based inspections which are required by rule.¹ The purpose of such inspections is to evaluate the condition of the electrical facilities and then coordinate any necessary remediation. PGE recommends that utility wildfire mitigation inspections be described in each utility’s wildfire mitigation plan rather than prescribing additional inspection requirements through amendment to Chapter 860, Division 024 Safety Standards. This approach provides for the greatest amount of flexibility in regard to future wildfire mitigation strategies while at the same time embraces

¹ See, e.g., Oregon Administrative Rule (“OAR”) 860-024-0011.

guidance from the National Electrical Safety Code (NESC) and allows each utility to update its practices over time for its respective electrical system.² As each of the electric utilities within the state have their own unique grid characteristics and operate in varied physical and climate landscapes, each utility's wildfire mitigation inspections may vary in terms of inspection frequency, criteria, resources, and technology utilized. Per recent legislation, the utilities will also be required to submit wildfire mitigation plans to the Commission.

2. Safety Patrols – OAR 860-024-0011(2)(c)

PGE offers the following recommended amendment to OAR 860-024-0011(2)(c) as noted in bold text below:

(c) Perform routine safety patrols of overhead electric supply lines and accessible facilities for hazards to the public. The maximum interval between safety patrols is two years, with a recommended rate of 50 percent of lines and facilities per year.

(A) Safety patrols may be performed in a separate operation or while performing other duties, as desired.

The amendment recognizes that different forms of inspections take place on a utility's system, including, but not limited to, detailed inspections as required by OAR 860-024-0011(1)(b), and wildfire mitigation inspections. With the amendment, annual detailed inspections and wildfire mitigation inspections could contribute to achieve the overall coverage rate of lines and facilities per year. Functionally, safety patrols, in combination with detailed inspections and wildfire mitigation inspections, would cover approximately 50 percent of lines and equipment per year and satisfy the requirement of OAR 860-024-0011(2)(c). This approach avoids overlaps and multiple inspections of the same pole on an annual basis.³

Respectfully Submitted,

/s/ W.M. Messner

William M. Messner
Director Wildfire Mitigation & Resiliency

² See NESC Rule 012C ("maintenance should be done in accordance with accepted good practice for given local conditions known..."). Furthermore, NESC Rule 214A2 provides that "Lines and equipment shall be inspected at such intervals as experience has shown to be necessary."

³ See also NESC Rule 214A2 ("NOTE: It is recognized that inspections may be performed in a separate operation or while performing other duties, as desired.")