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To: [PUC.FilingCenter](#)
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Subject: Late response from Corvallis RFPD
Date: Monday, January 11, 2021 3:06:03 PM

Corvallis Rural FPD received a request from OPUC (Public Utility Commission) for suggestions relevant to their establishing new rules and recommendations for power company (POCO) measures to help mitigate wildfire risk and damage. I sent the following off Friday but I see now that the OSU mail system never sent it. I hope these comments are still useful.

I suggest the following broad areas for improvement be included in the response:

- determine optimum timing and extent of preemptive power blackouts to prevent arcing and fire ignition based on all the factors affecting wildfire ignition, spread, intensity, and damage. Should be done taking full advantage of existing GIS layers, updated by additional remote sensing (topography, vegetation, housing density, critical infrastructure, etc.)
- burial of power lines or use of insulated cable, especially in heavily forested areas
- better technology for detecting power line breaks and arcing - this is improving steadily and should be installed and monitored automatically
- more frequent and intensive inspection of all transmission components for wear and breakage
- vegetation inspection and control under and adjacent to power lines, including diseased, leaning and other high-risk vegetation. Inspection should take advantage of drones as well as manned aircraft.
- installation of additional weather stations throughout high-risk areas, especially mountainous areas where weather conditions vary greatly over short distances and where we currently have few stations. See info below from California.
- regulation of recreational use of POCO rights of ways (trail bikes, horses, illegal camping etc.)
- A less obvious, but I think equally important, one is for POCOs to include in their energy-saving window-replacement programs at least a recommendation for fire resistant window frames and glass. Vinyl frames melt too easily, and metal frames can transmit heat to the wood frame structure. Most codes require tempered glass panes and recommend fiber-glass frames. POCO rebates cover most of the cost of replacement with energy efficient windows. It would add essentially no cost for our POCOs to at least point out to customers the importance of fire resistance (ignition, breakage, and melting) as well as energy efficiency.

The following somewhat out of date (2014) report out of Texas may be helpful, especially for detection of transmission line faults:

<https://wildfiremitigation.tees.tamus.edu/faqs/monitoring-to-mitigate-wildfire-risk>

As we should all expect by now, California is even farther ahead. I suggest OPUC start with:

<https://www.cpuc.ca.gov/deenergization/>

This leads to the company-by-company guidelines for power interruptions and steps taken and planned to improve the information available for developing and implementing the guidelines. Of these the PGE plan seemed the best. What struck me as especially important is PGE's emphasis on installing additional weather stations, especially in mountainous terrain, where weather can vary dramatically over short distances and where there are now few stations. PGE's stations read-out over the internet, are publicly accessible, and include vid cams that can be controlled by Cal Fire.

One more over-arching issue: responsibility for wildfire mitigation in OR is now fragmented across endless silos. PUC needs to be working with (at a minimum) State ODF, OSFMO, OEM, OSU Forestry Extension Wildfire Program, and OR Natural Resources Institute (OR Wildfire Explorer). Plus of course our adjacent states, Federal and tribal partners, and the timber industry.

I hope this helpful.

Phil Sollins
Corvallis RFPD Board

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