



**Portland General Electric Company**  
121 SW Salmon Street • 1WTC0306 • Portland, Oregon 97204  
portlandgeneral.com

July 21, 2022

***Via Electronic Filing***

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

**RE:** AR 638 – Risk-Based Wildfire Protection Plan Proposed Rules

Dear Filing Center,

Portland General Electric Company (“PGE”), PacifiCorp d/b/a Pacific Power (“PacifiCorp”), and Idaho Power Company (“Idaho Power”) (collectively referred to as the “Joint Utilities”) submit these comments pursuant to the July 7, 2022, Ruling by Administrative Law Judge (“ALJ”) Mapes extending the comment period in this docket to July 21, 2022. These comments respond to the filing submitted by the City of Portland on June 30, 2022. The Joint Utilities are simultaneously filing separate comments responding to the Citizens’ Utility Board.

The City of Portland requests that the Commission add the following clause to the proposed rules “Subsections 8-10 of 860-024-0018 do not apply to equipment owned by municipal governments, as defined in ORS 174.116(1)(b).” The Joint Utilities, and in particular PGE, appreciate the working relationship we have with the City of Portland and are committed to continuing to partner with them on addressing identified items for correction or repair through our contract maintenance agreement. The Joint Utilities have strong concerns about the City of Portland’s requested language and do not support an exemption for municipal governments. While the Joint Utilities understand the concern of limited local government budgets, a wholesale exemption for municipalities from correction timelines is not necessary and, indeed, contrary to the purpose of mitigating risks of fire ignition in High Fire Risk Zones. The existing proposed rules include the opportunity for the city or any other entity to engage with the utility on identified repairs prior to corrections being made unless the risk is identified as one that “poses imminent danger to life or property.” The proposed rules, within OAR 860-024-0000, also provide the opportunity for the City of Portland or any other entity to request a waiver for specific repairs.

The Joint Utilities value the relationships we have with our local governments as partners in reducing wildfire risk within their communities. We understand the concerns being presented

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by the local governments, but note the existing rules provide options for mitigating the concerns being brought forth. We intend to continue to work with our local government partners on these issues as necessary, and as provided for in the existing proposed rule. However, we respectfully request that the Commission not adopt a wholesale exemption that could inadvertently increase wildfire risk within HRFZs.

Respectfully Submitted,

/s/ W.M. Messner

Director of Wildfire Mitigation and Resiliency

Portland General Electric Company

/s/ Amy McCluskey

Amy McCluskey

Managing Director, Wildfire Safety & Asset Management

PacifiCorp

/s/ Alison Williams

Regulatory Policy and Strategy Leader

Idaho Power