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July 21, 2021

Via Electronic Email

Public Utility Commission of Oregon
Attention: Filing Center
P.O. Box 10888
Salem OR 97308-1088

RE: OPUC Wildfire/PSPS Permanent Rulemaking Workshops - Portland General Electric Company
Feedback on OPUC Community Engagement "Scoping Questions"

Dear Filing Center,

As part of an agenda for the Public Utility Commission of Oregon's ("OPUC") Public Safety Power Shutoff ("PSPS") Workshop on July 12, 2021, the OPUC provided a series of "scoping questions" that it wanted those participating in this Workshop to provide feedback. Portland General Electric Company ("PGE") has reviewed those questions and provides feedback below. Please note that these represent preliminary thoughts and are not meant to encompass the entirety of PGE's positions on scope within this workstream.

High-Level Questions

PGE Feedback: Regarding individuals/communities facing risks and vulnerabilities, PGE looks at those in our customer base that have self-identified as "medically certified", as well as some rural customers within our service territory who could be potentially impacted by a PSPS event. We look forward to hearing from the Oregon Department of Human Services to understand how their outreach will aid in identifying and supporting vulnerable populations. Regarding interacting with and supporting communities, generally, PGE believes these questions should be framed with a lens of Investor-Owned Utilities ("IOUs") accountability or responsibility, rather than as ability to perform. IOUs bear a fundamental accountability to their customers to equitably apportion operational costs and that serves as a guiding principle for what responsibilities they should undertake. In addition, PGE believes that another baseline question that needs to be included here relates to what actions the OPUC and/or other state and local agencies are responsible for as part of support for an IOU PSPS event. In addition, it is critical for PSPS practices to be consistent with other emergency management programs for catastrophic events that also involve power outages, in ways that customers and the public don't find themselves trying to remember two sets of divergent instructions.

Definitions

PGE Feedback: PGE believes new terms – like “At-risk populations” and “Community partners” – that are introduced as part of wildfire/PSPS rulemaking will confuse the process and make it more challenging to arrive at consensus-based definitions. Thus, PGE is looking to the OPUC to consult with other agencies on already-acknowledged terms and definitions in relation to community populations, avoiding confusion in the rulemaking process. In addition, it’s relevant to note that OAR 860-021-09 already expressly states what data IOUs are permitted to ask customers for: (a) The name of person(s) responsible for payment on the account; (b) The name to be used to identify the account, if different than the actual name; (c) The birth date of person(s) responsible for payment on the account; (d) The social security number of person(s) responsible for payment on the account; (e) A current valid Oregon driver license number of the person(s) responsible for payment on the account; (f) The service address; (g) The billing address, if different than service address; and (h) Any available telephone numbers where the applicant can be reached night and day.

Community Engagement Procedures

PGE Feedback:

1. Regarding “**Who**” needs to be included as part of scope of wildfire/PSPS rulemaking, PGE fundamentally looks at the definition of wildfires/PSPS events from the perspective of the customers in our service territory. And that in turn first depends on the definition of PSPS areas as a matter of the geographical conditions that make such PSPS events more likely.
2. Regarding “**When**” and timelines for events, PGE believes that those timing considerations that have been laid out in the temporary wildfire/PSPS rules are suitable and should be examined for their effectiveness in practice, before making additional/changed rules. Regarding ongoing distribution of materials, PGE provides these materials for our customers and supports the OPUC’s efforts to undertake a discussion – to include PGE and other IOUs – around a state-wide communication campaign that by design incorporates some level of cost-sharing across relevant partners. Regarding ongoing meetings with community representatives, PGE has and will continue to conduct “town halls” and other similar events to educate about our role in wildfire/PSPS events. As we gain experience conducting these meetings we will better understand what cadence for them makes the most sense. Regarding collaboration with state partners and fellow IOUs, PGE collaborates with other electric utilities as part of normal business operations, so questions whether formalizing within wildfire/PSPS rulemaking is necessary? Regarding “immediately prior to/during” PSPS events, PGE is not sure what the inherent question is and looks to the OPUC to specify, so that we don’t speculate unnecessarily. Regarding reporting after a PSPS event, PGE favors conducting such reporting after the wildfire/PSPS season has concluded, given that resources after a PSPS event may need to be poised for another such event. PGE recommends that the OPUC consider a post-wildfire-season “After Action” summary of PSPS events as part of the rulemaking process.

3. Regarding “**What**” and the types of educational materials to provide, PGE supports identifying the specific channels that could be part of such a campaign; however, fundamentally, PGE’s focus is on outcomes from these educational efforts, and would like the scoping for rulemaking to have a similar focus. PGE believes that at least part of that scoping definition would be aided by learning about outcome-based data on wildfire/PSPS educational campaigns from other agencies and IOUs. Regarding meeting with community leaders to understand ‘at-risk’ profiles of population groups, again PGE believes these questions should be framed with a lens of IOUs’ accountability or responsibility, rather than as ability to perform a particular activity.
4. Regarding “**Where**” and GIS polygons, PGE has shared its polygon files with our customers (see [PGE’s website](#)), the general public, multiple agencies, and other IOUs. Our primary concern regarding scope would be the requirement in rules for a more detail in these map data files. Regarding service territories, that information is already public, so PGE is not clear why the OPUC would include that requirement in wildfire rulemaking. Regarding at-risk communities, PGE believes that aspect has already been covered in the “Who” section of OPUC’s scoping questions.
5. Regarding “**How**” and developing general protocols for defined groups, PGE maintains a ‘messaging playbook’ that is used to coordinate its respective, outward communication campaigns on behalf of wildfire/PSPS concerns. PGE believes that setting minimum standards for outreach should be explored during the wildfire/PSPS rulemaking process. PGE would like clarity from the OPUC on whether challenges in accounting for differences between counties is relevant for rulemaking.

Additional Scoping Questions

PGE Feedback: Regarding gaps between customer expectations and utility plans in relation to PSPS events, PGE is concerned about including this question as part of the wildfire/PSPS rulemaking, given its general nature and, thus, its susceptibility to broad interpretation. PGE requests that the OPUC seek input from state/local agencies on these gaps and the extent to which they are being separately addressed. Generally, PGE believes that rulemaking scope questions should directly relate to a PSPS event, preparation for it, and responding afterward, rather than perceptions outside of that arena. In addition, PGE asks the OPUC to respond to the following question: What is the OPUC expecting in terms of IOUs filing a Wildfire plan by 12/31 if the permanent wildfire rulemaking process is not complete by that date?

Respectfully Submitted,

/s/ W. M. Messner

William M. Messner
Director Wildfire Mitigation & Resiliency