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Via Electronic Filing

Public Utility Commission of Oregon
Attention: Filing Center
P.O. Box 1088
Salem, OR 97308.1088

RE: AR 638 OPUC Wildfire/PSPS Permanent Rulemaking Workshops - Portland General Electric Company Feedback on OPUC PSPS “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: 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 responsibilities the OPUC and/or other state and local agencies are responsible as part of support for an IOU PSPS event.

Definitions

PGE Feedback: OPUC definitions need to apply at a state level to allow for consistency in IOU adherence to Wildfire/PSPS permanent rules that encompass multiple counties across a given service territory. In addition, OPUC – along with participant stakeholders in providing input to the rulemaking process – should seek to avoid the introduction of new terms that require reconciled definition against existing regulatory terminology.

PSPS Protocols

PGE Feedback: Regarding timelines and communication for response to PSPS events, PGE believes IOUs have a fundamental responsibility to provide accurate information to customers. As a steward for our customers' safety during a PSPS event, PGE knows how important it is for customers to have up to date and accurate information on when power will be restored following a PSPS event. We consider providing customers with timely and accurate information a key priority, especially during a service outage, and constantly work to improve our ability to provide accurate information during what is a very uncertain time.

With respect to why PSPS events are called, the scope of the rulemaking effort should be focused on utility responsibilities, prior to, during and after a potential PSPS event, to coordinate with state and local agencies and communicate with its customers rather than what determinants define a PSPS area itself. Further, PGE believes that scoping questions in this regard need to be approached as considerations, rather than specific criteria for when a PSPS is executed.

Concerning "After Action Reports (AARs)", PGE believes its guiding principle referenced above under "High-Level Questions" again applies to consideration of such reports. To continuously improve we seek the opinions of our customers and the scoping questions should inquire about a reasonable amount of time needed to allow the IOUs to receive that direct input from them and incorporate into reports. Thus, while the scope of such reports should require some level of PSPS event-based fact-gathering, PGE believes that the scope of rulemaking around these reports should consider a level of stratification that relies on whether it has customer impact. For the latter, a "second AAR" further out from a given PSPS event should be considered. Regarding how best to communicate around PSPS events, PGE is looking for partnership and ideation on how to engage with customers that don't participate in the digital landscape.

Additional Scoping Questions

PSPS events declared by another electric utility: PGE seeks clarity from the OPUC on the required communications among utilities. Currently, in the OPUC temporary rules electric utilities are not required by rule to communicate with other electric utilities when declaring a PSPS event.

Communication with telecommunication providers: PGE continues to reach out to such providers to maintain a dialogue about PSPS event preparations and protocols. PGE also believes that OPUC scoping in this regard should encompass telecommunication provider resiliency efforts; in supporting "critical infrastructure" providers, IOUs should know the landscape of responsibility those providers are held to for their own infrastructure.

Back-up power for telecommunication providers: providing back-up power above and beyond normal utility electric service is not one that PGE currently provides. PGE does not currently have a tariff to provide back-up power to telecommunications company facilities (or any other customer) and there is no Oregon statute or rule requiring an electric utility to provide such back-up service. Nonetheless, PGE is willing to explore the possibility of developing a pilot program to offer back-up service to telecommunication facilities within a PSPS zone.

Impact of providing back-up power to telecommunication facilities: in PSPS areas on customer rates, as part of such exploration mentioned above, PGE would need to explore the cost of providing back-

up service and the tariff structure that could be used to price that service to ensure any associated costs are equitably allocated across all customers.

Lastly, reporting requirements PGE believes such requirements are not germane to the scope of the PSPS workstream. Regarding decision criteria, PGE believes that such criteria should only be within the purview of PSPS event decision-making; in other words, consideration for such criteria should only involve relevant factors to wildfires and the conditions that cause them.

Respectfully Submitted,

/s/ W. M. Messner

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