

To: Oregon Public Utility Commission
From: Scott Winkels, League of Oregon
Date: 1/8/2021
Re: Docket 638

What are your objectives/expectations for wildfire mitigation?

The decision to terminate power in a region to avoid wildfire risk sets in a motion a cascade of events and further decision points for cities, residents and critical infrastructure providers. Shutting of power, while necessary, limits the ability of local government to communicate with emergency instructions and impairs the delivery of critical services such as water, wastewater and traffic control. One of the primary objectives of cities is to develop clear lines of communications and contingency planning for when the risks of terminating power outweigh the risks of leaving it on.

Further, the LOC believes the rules should include pre-shutoff planning that identifies critical infrastructure that will be impacted, traffic control measures necessary to mitigate the loss of intersection controls and medically vulnerable populations that will require removal to safer locations.

Finally, the LOC would like to see vegetation control measures put in place that will reduce the risk of ignition points. Ideally, such measures will provide clear standards with inspection schedules with no room for ambiguity.

What are the components of a comprehensive electric utility WMP e.g., what does the table of contents look like?

- I. Criteria: Under what conditions will a power-shutoff be considered.
- II. Decision Points: When a shut-off is decided, what happens next?
- III. Impact mitigation: How do we evacuate, move people, provide critical services without power?
- IV. Pre wildfire mitigation planning. Vegetation management, wood pole replacement...

What are your priorities and/or what are the most urgent issues to tackle before next fire season?

All of the tasks in front of us are important and the organizations have much to do in a short amount of time, while responding to COVID-19, however, mitigating risk seems like the most critical task. Following close behind, developing pre-fire shut-off warning and communication planning.

What questions do you have about the rulemaking process and/or WMPs?

Our primary question is what can be achieved by rulemaking on vegetation management and what will require state or federal legislation.

What are your other comments or concerns?

The LOC appreciates that wildfire conditions can be dynamic and that we will most likely not be able to address every possible contingency. However, we'd very much like to be able to address and mitigate as many likely or potential scenario as is practical.