

BEFORE THE PUBLIC UTILITY COMMISSION OF OREGON

AR 638

In the Matter of )  
 )  
Rulemaking Regarding Electric Utility Wildfire ) COMMENTS OF LUMEN IN  
Mitigation Plan. ) SUPPORT OF DRAFT RULES  
 )  
\_\_\_\_\_ )

United Telephone Company of the Northwest, CenturyTel of Oregon, CenturyTel of Eastern Oregon, and Qwest Corporation (collectively “Lumen”) offer these comments in response to the OPUC Staff’s Draft Temporary Rules for Incident Reporting and Public Safety Power Shut-offs (“Draft Rules”), dated April 6, 2021. Lumen appreciates this opportunity to comment and generally supports the concepts in the Draft Rules. Lumen offers the following brief comments on the proposed notification requirements.


Lumen agrees that reverse 9-1-1 calling is a helpful tool for emergency response, including notifications of power shut-offs designed to prevent wildfire. The current Draft Rules states:

In preparation for the 2021 fire season, utilities must work with local and state public safety partners to develop an understanding of reverse 9-1-1 capabilities and identify preferred or most effective public notification tools (e.g., local radio stations, TV, social media) in order to allow jurisdictions with public alerting authority to send timely and appropriate messages to populations potentially impacted by a de-energization event, the utilities must develop Common Alerting Protocol compliant messages and protocols for use by the designated alert authorities. Whether local jurisdictions choose to utilize their Public Alert and Warning system to notify the public of a de-energization event is at their discretion.

Lumen is currently engaged in regular conversations with its partners at the State of Oregon, including DAS, OEM and the Commission. The initial discussions have been productive and the parties appear to be working towards a reverse 9-1-1 plan that recognizes system and information limitations. Although the Draft Rules contemplate coordination between local and state public safety partners, Lumen, as a private and essential partner, will continue to participate in those discussions and looks forward to working with the State, the Commission, and local governments.

Lumen also urges the Commission to ensure that public safety partners like Lumen are prioritized in notifications so that, wherever and whenever possible, it can employ measures to maintain critical facilities in the event of a power outage.

Respectfully submitted, this 3<sup>rd</sup> day of May 2021.

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