



NW Energy Coalition
for a clean and affordable energy future

Oregon Public Utility Commission
201 High Street SE, Suite 100
Salem, OR 97301-3398

January 8, 2021

Dear Commissioners and staff,

NW Energy Coalition is pleased to submit these responses to Docket AR 638's scoping survey on wildfire mitigation planning.

• ***What are your objectives/expectations for wildfire mitigation?***

1. **Build back better and find creative solutions to avoid capital bias.** We urge the Commission and utilities to approach mitigation in a manner that benefits communities and customers, rather than solutions that rely on large utility investments and consider only rate impacts, where possible and prudent. Though they are currently undervalued or overlooked in resource planning, distributed resources and other small-scale, customer-centric investment may often yield the least-cost, least-risk resource, and utilities should be incentivized to seek out these solutions in key geographic areas. Abatzoglou et al. (2020)¹ found that California IOUs' actual use of power shutoffs to mitigate fire risk exceeded that which would have been predicted by vegetation and weather patterns. They further suggest that this reality of overly relying on shutoffs "may elevate incentives" for "generation and storage to improve resilience" (p. 6-7). We call for a balanced approach to both recovery and ongoing mitigation.
2. Center Executive Order 20-04's directives to **"prioritize actions that will help vulnerable population and impacted communities adapt to climate change impacts" and mitigate energy burden**². This requires considering historic underinvestment and disproportionate impacts in certain communities, rather than treating ratepayers and the public as a single entity.

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

1. **A community engagement-centric protocol to follow in the case of a power shutoff.** We applaud the steps some utilities have already taken to create and publish such protocols, but would encourage more specificity. A utility should submit the following to the Commission for review after a shutoff³:
 - a. An explanation of the decision to shut off power and the factors considered;
 - b. The time, place, and duration of the shutoff,
 - c. The number of affected customers, including how many of the customers were medically-dependent customers,
 - d. Information on local community representatives contacted prior to the shutoff event.

¹ Population exposure to pre-emptive de-energization aimed at averting wildfires in Northern California (2020). <https://iopscience.iop.org/article/10.1088/1748-9326/aba135>.

² <https://www.oregon.gov/puc/utilities/Documents/EO-20-04-WorkPlans-Final.pdf>.

³ <https://iejusa.org/wp-content/uploads/2020/10/V3.3-Policy-Brief-CA-Shutoffs-Data-Brief.pdf>

2. **Community engagement plan.** While the Governor’s council’s final report⁴ identified public engagement as a high priority, it did not differentiate between the public at large, and key communities at risk of wildfires, shutoffs, and other climate change-induced impacts, as required by Executive Order 20-04. As an example of the confluence of these factors, there is data to suggest that those who lost their homes and jobs in the Almeda fire in southern Oregon were disproportionately low-income Spanish-speaking households living near agricultural zones in manufactured homes⁵, who are also disproportionately exposed to covid-19. Any mitigation strategy should ensure communication with representatives of communities that are hardest hit by wildfire and other hazards.
 - a. Utilities should identify community-accountable organizations that operate in shutoff zones and describe plans to communicate with these organizations. Public entities are a fundamental first step, but do not operate within and across key affected communities.
 - b. Much as the Commission does when publishing memos, utilities could publish their community outreach plans and how/whether they incorporated (or did not incorporate) feedback received while executing those plans.

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

Across NWECC’s involvement in Commission processes, a consistent appeal for the last year has been for **access to public-facing utility data display**. We are encouraged that the Commission planned to release a Gantt chart to help the public track activities in Q4 of 2020⁶, and we were part of discussions that suggested the chart would identify which dockets would explore the inclusion of different kinds of public-facing data (e.g. energy burden by zip code, locational value). We encourage collaboration in data sharing between the Safety, Reliability & Security division, and the Energy Resources & Planning division, to ensure the sorts of data sought in both types of proceedings, results in the sorts of grid investments that impacted communities consistently seek.

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

1. How will the Commission ensure diverse participation in the rulemaking process, beyond issuing general public calls for participation? Does staff proactively and individually reach out to community representatives beyond utility and local government entities?
2. Participation leads to meaningful outcomes through transparency. How will data and decision-making be publicly accountable?

• ***What are your other comments or concerns?***

We are grateful for the steps taken so far to ensure that rulemaking participation does not assume prior knowledge of utility regulation, and encourage the Commission to continue this important work.



Heather Moline
Policy Associate

⁴ https://www.oregon.gov/gov/policy/Documents/FullWFCReport_2019.pdf.

⁵ <https://www.oregonlive.com/pacific-northwest-news/2020/09/almeda-fire-ravages-mobile-home-parks-in-rogue-valley-exacerbating-affordable-housing-shortage.html>.

⁶ <https://www.oregon.gov/puc/utilities/Documents/EO-20-04-WorkPlans-Final.pdf>