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Via Electronic Filing
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Oregon Public Utility Commission
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RE: Comments on Idaho Power's, Portland General Electric's, and PacifiCorp's 2026-2028 Wildfire Mitigation Plans (Dockets UM 2207-2209) from Northwest Energy Coalition, Community Energy Project, and Oregon Citizens' Utility Board

NW Energy Coalition, Community Energy Project, and Oregon Citizens' Utility Board (Advocates) appreciate the opportunity to provide comments and extend our thanks to the utility departments and planning teams for their considerable efforts in developing the first multi-year wildfire mitigation plans (WMPs). We also thank the Oregon Public Utility Commission (PUC) Staff and Commissioners for their ongoing diligence in improving WMPs and promoting the public interest through this process.

First, we present our high-level takeaways from reviewing and comparing PacifiCorp's (PAC), Portland General Electric's (PGE), and Idaho Power's Wildfire Mitigation Plans and share related recommendations for how these plans can be improved at a system-wide or territory-level. Then, in the following section, we do a comparative analysis of the investor-owned utilities (IOUs) plans by WMP section (Risk-Spend Efficiency, Grid Design & System Hardening, Vegetation Management, Situational Awareness, etc.), following a similar format that the PUC recommends the IOUs submit their plans.

Main Takeaways and Recommendations:

- **Plans should reflect adaptive management towards resiliency and affordability, which includes creative funding for wildfire mitigation.** Each IOU states it is balancing safety needs with energy demand within the context of making rates cost-effective for ratepayers. However, the WMPs do not adequately reflect these efforts, despite the complexity and challenge that is inherent in this issue. WMPs should identify concrete ways in which adaptive management efforts within their utility governance systems create affordable pathways to enhance resiliency and meet a growing energy demand, including creating long-term partnership building, aligning mitigation efforts with community-level wildfire planning, and approaching wildfire mitigation with a holistic perspective that understands resiliency for uncharacteristic wildfire requires mitigation efforts that expand beyond a utility's system. WMPs must also address community-level wildfire adaptation and recovery efforts (home hardening, resiliency hubs, collaboration with Community Wildfire Protection Plans, and adaptive vegetation management).
- **IOUs must balance capital investments with Operations and Maintenance costs.** IOUs such as PacifiCorp and Portland General Electric are investing more in capital enhancements than in personnel and maintenance. Utilities are transitioning much of their system from Operations and Maintenance (O&M) personnel expenses to

low-maintenance automated or smart devices that remotely sense faults, etc. While this may save on O&M costs in the future, the immediate effect is higher capital costs that ratepayers end up paying, and lower personnel investments (**Appendix A**, **Figure 1 and Figure 2**).

- **IOUs should use rate increases as a last-resort option to fund wildfire mitigation upgrades to their systems.** IOUs should leverage momentum from existing wildfire mitigation activities that intersect with their systems and territories, including joining collaborative partnerships that leverage existing wildfire mitigation work, including thinning, prescribed fire, and neighborhood or home-hardening efforts.
- **IOUs should be required to join collaborative efforts that enable grant funding and responsible use of public funds to complete mitigation on private and public lands.**

Recommendations and Feedback for Oregon-Based IOU Wildfire Mitigation Plans

I. Readability, Format, and Reach of WMPs

As readers of the WMPs, we found the substantial increase in page length to be overwhelming and difficult to manage, given stakeholder capacity. Historically, public comments on these plans have been extremely limited, and our experience is that these voluminous plans have made the process less transparent, and will likely further discourage engagement and create additional barriers to meaningful participation.

We commend **Idaho Power's** plan for its strong narrative quality, which was both intentionally descriptive and easier to follow. **Portland General Electric** continues to improve the readability of its plans. In contrast, **PacifiCorp's** plan was unfortunately verbose and monotonous, and with the extensive redaction of cost information, it hindered our ability to evaluate the plan with confidence. This warrants a serious question if PacifiCorp is making prudent investments and demonstrating that the company is making cost-effective decisions.

Recommendations:

- Break up the plan with audiences in mind to make the material more relevant, digestible, and engaging for readers. For example, community members have expressed interest in understanding high-level mitigation strategies and awareness of utility activities occurring in their neighborhoods. Most importantly, people want to know what support, communication, and resources will be provided before, during, and after outages, wildfires, or other extreme events. Structuring plans and reporting with distinct audiences in mind also demonstrates that not all information needs to be included or calculated in the main body of the WMPs, such as diving deep into technologies, modeling, and data platforms, which is more relevant for the PUC and stakeholders and can be filed separately or described in appendices. Restructuring can also lend itself to targeted outreach to those respective audiences, such as local governments and emergency managers, community-based organizations, etc. Key audiences to consider include PUC

Staff, residential customers, small businesses, environmental justice communities, local governments and community partners, utility peers, and customer advocates.

- Use the WMP shared format to improve the WMP flow and comprehension of topics. When elements, such as “overview”, “mitigations”, and “results”, of a single mitigation strategy or program are spread across multiple pages or sections, it becomes difficult for readers to understand and evaluate the strategy in its entirety.

- Reduce redundancy wherever possible. Plan revisions should focus on clearly conveying essential information while minimizing unnecessary repetition.

- Consider setting a page limit or recommended page length to discourage superfluous information and redundancy. This page limit would apply to the main body of the text, but would not apply to any included appendices.

II. The Risk-Spend Efficiency Tool: Consider interdisciplinary audiences

Advocates reviewed each utility’s Risk-Spend Efficiency (RSE) Workbook as filed with the PUC. Given the breadth and density of data within each of these workbooks, **advocates strongly recommend that the PUC advise utilities to improve their RSE report-out formats when filing these workbooks and communicating with stakeholders.** We understand that the RSE methodology is new to implementation and that more improvements can be made in the data recording and reporting process. We strongly urge utilities to use metrics developed by the PUC, such as the Risk-Spend Efficiency score that has been developed, to communicate the risk and the investment efficiencies the utilities find in their own data. Advocates strongly urge utilities and the OPUC to enhance the science communication of their RSE workbooks so that stakeholders and interested parties can more easily understand the IOUs' RSE metric score. Science communication refers to breaking down complex, technical topics and presenting the information in a coherent way that multiple audiences - from experts to members of the public - can understand and easily interpret.

III. Grid Design and System Hardening: technology requires prudent investments

All plans reflect outsized investments into grid hardening technology, such as switching wood poles for steel poles, installing wire mesh, undergrounding, covered conductors, and installing remote sensing devices (**Appendix A**, **Figure 1 & Figure 2**). We understand the need to follow the latest technology developments, however, more investments into personnel and governance structures is needed to reduce wildfire risk to communities. That being said, two IOUs operating in Oregon show commitments to a tailored grid design that considers affordable system upgrades.

Idaho Power shows progress in its commitment to investing $100,000 into fire mesh pole wrapping over the next three years, which reduces the overall economic risk to consumers as well as the statistical probability of wildfire ignition on its system. A 2025 study found that fire resistant mesh produces satisfactory results in significantly reducing fire risk and is a fraction of the cost of replacing wood poles with steel, especially if the wood poles have long-life left.[1]

[1] Machado, J. S., Cordeiro, E., Knapic, S., Morgado, T., & Dias, A. M. P. G. (2025). Fire Protection of Utility Pine Wood Poles. *Fire (Basel, Switzerland)*, *8*(1), 3. https://doi.org/10.3390/fire8010003

Portland General Electric (PGE) shows progress of adaptive management that incorporates a diversity of implementation efforts that may bolster the utility's resiliency to wildfire while still considering cost-effective methods. The utility states, "while PGE would not typically replace poles solely based on age, system resiliency against wildfire damage is improved by increasing the diversity of pole materials on a circuit."[2] We appreciate the utility's awareness of pole age class versus risk reduction and introducing a diversity of methods to upgrade infrastructure and hardware when it is needed. PGE also demonstrates knowledge that the probability of wildfire ignition across its system varies, and that High Wildfire Risk Zones (HWRZs) show distinct patterns across system-wide territories, which necessitate a diversity of mitigation strategies that match the risk level and locale-specific need.

In contrast, **PacifiCorp (PAC)** is investing roughly $1.3 billion dollars into its grid design and system hardening efforts over the next three years (2026-2028), following the trend of IOUs to recover costs through capital investments rather than investing into long-term strategies to maintain system resiliency. PAC's Risk-Spend Efficiency workbook, for example, contains numerous errors and holes, which they attempted to correct in their WMP Data Template Resubmission they filed on March 13th, 2026. PAC's $1.3 billion dollar investment into system hardening is a short-term solution to a long-term, more complex problem: continuing to invest billions of dollars into new infrastructure benefits the Company's asset portfolio - in order to boost their S & P credit rating - and does the bare minimum to make their infrastructure more resilient to uncharacteristic, large-scale wildfires. We are concerned that PAC is not making prudent investments to meaningfully reduce wildfire risk to communities. **At this point we are inclined to recommend that the Commission not approve PAC's WMP, or in the alternative, approve it with conditions.** These conditions would include investments into scalable, community-specific needs for wildfire risk reduction, including collaborating meaningfully with HOAs, neighborhood associations, and public land agencies, and providing concrete examples of cost-comparisons for grid design and system hardening that is the least-cost, least-risk option. We are interested and open to the Independent Evaluator's and PUC Staff's thoughts on this.

Recommendations:

- We recommend that Staff provide PacifiCorp more detailed guidance and instructions for making significant grid design and system hardening upgrades, compared to other less capital-intensive strategies, and require PAC to clearly explain why its proposed wildfire mitigation strategies are the most cost-effective solution.

IV. Monitoring Vegetation Programs by Gauging Forest Health

We appreciate the detail that **PGE** and **Idaho Power** have incorporated into their vegetation management sections, including pictures, explanation of vegetation management across diverse ecotypes, and considering the characteristics of different tree species that interact, grow and fall at different rates across heterogeneous geography (slow growing conifers vs. fast growers like alder, aspen, willow, etc.). Within a planning framework, these IOUs give a sense of what their programs do and are able to accomplish within an operational year. However, all three IOUs can improve their report-out methods and move from an explanatory vegetation management section to a more concise report-out for stakeholders with limited capacity to review. **We suggest a 1-2 pager that can simply and easily communicate important metrics (such as # of miles of lines inspected in a year, or health of the trees**

[2] UM 2208/121. Portland General Electric, Wildfire Mitigation Plan, 2026-2028.

within a territory or High Fire Risk Zone) in order to better communicate the state of a utilities' vegetation management program. For example, Puget Sound Energy is working with consultants to conduct a forest health study within their territory in order to monitor what adaptive management methods their vegetation program should incorporate[3]. We encourage IOUs to think beyond the grid, and suggest that all Oregon-based IOUs follow suit in order to have a better understanding of what types of vegetation management needs to be done and can easily report to the Commission and to stakeholders the state of their vegetation programs, especially within the context of climate change.

PacifiCorp provides the least amount of detail in its WMP vegetation management section. Again we recommend, specifically to PacifiCorp, to enhance not only the format but their communication methods to better inform WMP audiences of their vegetation management as well as the progress of their programs. IOUs need to spend less time on explaining how their programs work and more time reporting out clear metrics of economic benefits to ratepayers, such as lowered wildfire risk to communities (% of homes enrolled in a wildfire awareness program? # of people who attended a community engagement event?) and landscape resiliency metrics, such as acres treated or number of public land agencies with MOUs with the utility.

All three IOUs fail to cite the best available science for wildfire mitigation and restoration efforts that inevitably improve landscape resiliency not just along transmission corridors, but across IOU territory and intersecting landownerships.[4] These plans are set up to emphasize vegetation management directly within their rights-of-way, which leaves little room for the IOU to address wildfire in a long-term and holistic manner, thinking beyond their own systems and becoming a true partner with land agencies, HOAs, neighborhood associations, and more.

Finally, IOUs do not mention prescribed burning as a feasible land management tool that has been proven to be effective and affordable across many different ecotypes. The U.S. Forest Service reports that prescribed burns almost always stay within their planned area — about 99.84 % of burns go as planned. That implies an escape (uncontrolled) rate of roughly 0.16 % — about 1 or 2 escapes per 1,000 prescribed burns conducted by the Forest Service each year.[5] From 2023, according to the U.S. Forest Service statements, *an even smaller percentage* of prescribed fire escapes ever cause property damage or become significantly destructive fires.[6] Scholarly reviews describe escapes as rare events, and very few of those lead to large-scale destruction.[7] We encourage IOUs to work with the OPUC and the Oregon Department of Forestry to explore options related to ecologically beneficial land management that will improve forest health; reduce the risk of a large-scale, uncharacteristic wildfire threatening both their grid systems and nearby homes; and may offer more cost-effective long term solutions.

Recommendations

[3] "Puget Sound Energy: Wildfire Risk & Program Management" Presentation for Adapting Together Conference. Oregon State University. March 4th-6th, Skamania, Washington.
[4] Hessburg, P. F., S. J. Prichard, R. K. Hagmann, N. A. Povak, and F. K. Lake. 2021. Wildfire and climate change adaptation of western North American forests: a case for intentional management. Ecological Applications 31(8):e02432. 10.1002/eap.2432
[5] USDA 2022. "From the Chief's Desk: Reviewing Prescribed Fire Program." https://www.fs.usda.gov/es/node/655785002?utm
[6] USDA 2023. "Forest Service Officials Prepare for a Prescribed Burn." https://www.fs.usda.gov/about-agency/features/professionals-prepare-for-prescribed-burn?utm
[7] Varner et al., "Increasing Pace and Scale of Prescribed Fire via Catastrophe Funds for Liability Relief," *Fire* 2021, *4*(4), 77;https://doi.org/10.3390/fire4040077

- Advocates recommend each IOU produce a 1-2 pager that can simply and easily communicate important metrics (such as # of miles of lines inspected in a year, or health of the trees within a territory or High Fire Risk Zone) in order to better communicate the state of a utility's vegetation management program.

- IOUs in Oregon ***must*** join collaborative efforts through contractual MOUs with public land management agencies, such as through an All-Lands Partnership or a forest collaborative, as Idaho Power has done through the Southwest Idaho All-Lands Partnership[8], in order to reduce wildfire risk on both public and private land ownerships. This would create opportunities to save money by cutting the IOUs expenses through leveraging federal grants, rather than fronting the entirety of vegetation management costs by themselves.

- IOUs *should look to smaller utilities*, such as cooperatives or member-owned utilities, to enhance their wildfire mitigation plans. For example, **Eugene Water and Electric Board** and **Consumer Powers** provide concrete examples of engaging local communities and leveraging momentum built by previous wildfire mitigation initiatives funded through the Healthy Forest Restoration Act (2003), Community Wildfire Protection Plans (2003), the Collaborative Landscape Restoration Program (CFLRP, 2009), or the Wildfire Crisis Strategy (2021), or the Wildfire Assessment and Resiliency Network (WARN) federal funding.

- IOUs should leverage relationships with the Oregon Department of Forestry's Prescribed Burn program and explore the cost-effective and ecologically effective prescribed burn method to reduce risk to communities and restore resiliency in different ecosystems.

V. Major advancements in Situational Awareness

Real-time data, expanded and shared detection cameras, and strategically deployed weather stations have demonstrated effectiveness in enhancing data granularity, accelerating response times, identifying crew needs, and informing mitigation planning across all users. We are encouraged by the ways **Idaho Power, PGE, and PacifiCorp** have advanced these types of investments through collaboration and partnerships, including outcomes from the Oregon Wildfire Detection Camera Interoperability Committee (OWDCIC) to further streamline detection platforms. These collaborative models can help reduce costs and duplication of efforts while maximizing public benefits and strengthening a more unified approach to situational awareness and preparedness.

One of the advocates recently visited **PacifiCorp's** Wildfire Intelligence Center and was encouraged by the level of communication touch points between first responders, County Emergency Managers, and PAC staff. The visit also highlighted PAC's access to a region-wide, real-time view of potential fires and fire behavior to determine de-energization actions. There was notably more camera coverage in the West Coast states than further inland Western states. We could not find in PAC's WMP that 1,229 fires were monitored by the Wildfire Intelligence Center in 2025, but this number is shared in its WMP presentation to the PUC on March 5th.[9] Advocates believe it would be advantageous for PAC to make this information accessible in WMPs and include metrics such as the location of the fires, and the number of fires detected, responded to, and contained as indicators of risk reduction.

[8] Southwest Idaho All-Lands Partnerships Website. https://idall-lands.org/
[9] See slide number 10: https://edocs.puc.state.or.us/efdocs/HAH/um2207hah344283028.pdf

A key challenge that warrants proactive attention within situational awareness is data management. **PacifiCorp** has highlighted concerns regarding the volume of data generated by its situational awareness initiatives, and **PGE** is planning for its own 24/7 Wildfire Intelligence Center. Without well-defined standards, the benefits of increased data collection may be offset by operational and cost burdens in the long-term.

Recommendations:

- Advocates recommend utilities and PUC Staff to take a deliberate approach to near-term and long-term data management planning, including establishing clear protocols for data retention, storage capacity planning, and criteria for secure deletion.

- Continued coordination to support situational awareness initiatives that improve cost efficiency and maximize the value of shared investments through collaboration and resource sharing.
    - The lessons learned and the committee-based model exemplified by OWDCIC should be adapted and applied to other areas of utility wildfire mitigation to drive broader, system-wide improvements. It would be worthwhile for utilities to set up this type of model in a couple of areas– with relevant state and local groups for vegetation management activities, and local preparedness initiatives that come from Community Wildfire Protection Plans. It is important to know what is already being done and where priorities and goals overlap.

- IOUs ***must*** have accessible comparisons of grid hardening vs situational awareness and other similar cross-comparisons to better illustrate cost-benefits of mitigation strategies.

VI. Grid Operations and Protocols for sensitive settings

Utilities have moved forward with increased sectionalization of their circuits to lessen the number of customers who may be impacted by fast-trip outages from sensitive powerline settings. Sectionalization has also allowed for more control over the protection modes of these settings and informed location of faults, which helps speed-up restoration efforts and cuts down patrol time and costs. However, the lack of sensitive setting data has caused a gap in understanding its risk reduction as a strategy.

PacifiCorp is unclear of the correlation between outages that would have occurred regardless of activated enhanced safety setting (ESS) versus ESS-related outages. PAC only recently began calculating ESS-effectiveness in reducing wildfire risk using ignition and ESS activation data from 2025 and state they will need “several years” to refine the values; PAC shared no information on current calculations. **Idaho Power** similarly says it will require additional years of data to test enhanced protection settings (EPS) performance and impact. Both **PAC** and **Idaho Power** quantify sensitive setting outages on their system as each outage linked to a device with these settings enabled.

PGE’s analysis suggests an approximately 16% annual ignition reduction due to enhanced powerline safety settings (EPSS) implementation, while acknowledging absence of historical performance data and limitations in direct measurement capabilities. We are interested in getting a breakdown of this calculation from PGE. Furthermore, PGE captures EPSS interruption data through Customer Average Interruption Duration Index (CAIDI) on EPSS circuits and additionally, captures customer complaints connected to locations with activated EPSS modes as a way to monitor EPSS occurrences.

VII. Emergency Preparedness: Foster engagement and resiliency to wildfires

The reliance on neighborhoods and local resources in times of crisis cannot be overstated. From utility-run wildfire workshops to listening sessions held by advocates, participants have expressed a lack of knowledge on outage support and safety. From Community Energy Project's listening sessions last year, most participants stated they felt ill-prepared for a wildfire or a PSPS, and while some indicated they have basic supplies and "go-bags", all of the participants said they wanted more clarity on available resources in emergency situations and how to access them.[10] The more prepared customers are as a baseline, the more prepared they can be when notice is short or not given at all. We recommend that during in-person workshops and tabling events in high fire risk zones (HFRZs), utilities provide supplies and resources useful in a PSPS or power outage, rather than utility merch like pens, water bottles, etc. Many customers come from small communities, and when notice of PSPS is announced, the very limited resources within their communities get overburdened. Utilities can offer free go-bags with branded items like:

- A portable charger
- A flashlight and batteries
- Safety info cards
- N-95 masks

Kits like these can help participants have the basic needs to feel more comfortable during an outage without the worry of gathering harder-to-find last minute items. These kits could be obtained for less than $50 per kit (Appendix A, Table 1). These supplies can also help reduce the demand on Community Resource Centers (CRCs) by focusing on areas with the greatest need and for the most critical customers. Partnerships with CBOs are critical to help facilitate and enhance this type of work and expand the reach of preparedness to vulnerable groups.

Recommendations:

- During in-person workshops and tabling events in high fire risk zones (HFRZs), utilities provide supplies and resources useful in a PSPS or power outage.

- We recognize the differences that each utility has when it comes to their outreach and equity methods. For greater transparency and best practices, Advocates urge that utilities develop annual community outreach plans to be filed with the WMPs updates, and a follow-up report to be filed after fire season. These reports would consist of:
    - List of partners and efforts to expand partnerships at local-levels, both public safety and CBO, and opportunities for collaborative outreach in existing community outreach channels
    - Communication cadence (How often does communication happens with local government)
    - Qualitative insights (More narrative on community forums and FAQs)
    - Baseline equity standards (interpretation standards, facilitation tools, etc.)
    - Improvements and lessons learned that have shaped or will shape community engagement
    - Community Resource Center (CRC) coordination, listing community groups, tribal partnerships, etc

[10] See our July 11, 2025 UM 2340 Joint Comments to revisit CEP's listening session findings on pages 10 and 11. https://edocs.puc.state.or.us/efdocs/HAC/um2340hac338190027.pdf

- Sharing best practices with other utilities to develop shared metrics of best practices.

This would clearly allow for staff and advocates to see the lessons learned and accomplishments the utilities have achieved within that year.

VIII. Public Safety Power Shutoffs are rare. Outages are not.

PacifiCorp and **PGE** have not initiated PSPS events since 2022, and **Idaho Power** has never conducted a PSPS. There have been significant resources allocated for PSPS and it is apparent the level of work done from all utilities to have clear protocols for PSPS and clear guidelines to inform customers of these planned shutoffs. Yet, when utilities rely on de-energization strategies, whether through Public Safety Power Shutoffs (PSPS) or sensitive powerline settings, wildfire mitigation investments should *also* support customer and community preparedness for outages. Centering the public interest requires addressing the real and disproportionate impacts outages have on customers, particularly those with heightened health, financial, or access vulnerabilities.

As required under SB 762 (2021) section 3(d), utilities must establish de-energization protocols that promote public and first responder safety while preserving critical infrastructure. However, for customers, each outage, especially those that are unplanned, prolonged, or lack clear restoration timelines, poses meaningful risks to health, safety, and economic stability. Despite these risks, there remains a significant gap in sensitive setting protocols outside of utility decision making on setting modes. This lack of attention on impacts limits accountability and inhibits opportunities for system-wide learning, expanding, and improvement of wildfire mitigation strategies, especially those with co-benefits.

Recommendations:

- PUC Staff should require utilities to establish distinct protocols, data collection, and reporting requirements for sensitive setting-related outages. Given the absence of data and clear identification of sensitive setting outages so far, PUC Staff should consider expanding data collection and reporting requirements to all significant outages during fire season. With UM 2340 planning to capture customer impacts to plug into future RSE models, we have to start meaningfully gathering data now.
    - At minimum, sensitive setting or fire season outage reporting should align with existing and *relevant* PSPS rules[11] to enable meaningful evaluation, lessons learned, and captured impacts to people, especially vulnerable communities and small businesses.

- IOUs should expand and prioritize customer-focused resilience investments, including improving battery backup programs, piloting microgrid projects[12] (which have year-long flexible load benefits), and enhancing funding for local emergency preparedness planning with community partners, with a focus on vulnerable and high-risk populations.

[11] OAR 860-024-0160- Reporting Requirements for Public Safety Power Shutoff. https://oregon.public.law/rules/oar_860-024-0160?utm

[12] Puget Sound Energy's 2024 WMP feasibility analysis on remote grid systems would serve customers with a combination of solar, batteries, and generators when power lines are de-energized. PSE states alternatives can be more cost-effective than undergrounding, particularly when there are limited customers at the end of long line segments.

- IOUs should provide worst-case restoration estimates to support adequate customer preparation when communicating outage durations.

- IOUs need to seriously consider initiatives and efforts to mitigate customer harms, Advocates have suggested before including the improvement and expansion of food loss reimbursement processes (e.g., SNAP replacement process[13]), offering bill credits for extended outages[14], and developing both near-term and long-term strategies to reduce the financial, health, and safety impacts of outages associated with wildfire risk and grid operations. We would like explanations on why these strategies to address customer harm have not been considered by utilities or explored by PUC Staff.

IX. Diversifying and Improving Outreach

Advocates recognize the effort that has been made by the utilities to improve and diversify their outreach methods. We are specifically pleased with the listed community events on the utilities' wildfire webpages for customers to learn more about utility activities. We appreciate **PAC's** addition of localized wildfire mitigation activities on its website, as this has been something advocates have been recommending, and believe the other utilities should follow suit.[15] We also commend **PGE** on a robust social media ad campaign, as we mentioned in our comments last year.[16] We have found that many people rely on social media to get vital information and we are seeing the implementation of this and the success reach new demographics. We encourage more collaboration with CBOs as they often are very in tune with their communities' needs. **Idaho Power** shared within their mitigation plans that by working with CBOs they are able to have increased success in reaching communities in HRFZ.

Recommendations:

- Advocates recommend having increased communications and information at CRC locations and resources provided. PACs survey information showed that those who rely on medical needs are more likely to have used 7 out of 9 resources.

- To alleviate some of the cost for CRCs we encourage providing free supplies to customers at in-person events to help reduce burden.

- **PAC** should clearly define what "other entities" qualify as a strategic customer, and how their prioritization benefits the community.

- **PAC and IPC** should include a greater social media ad campaign to help capture different audiences and languages

[13] Process for SNAP food lost in disaster, including power outages, has been a burdensome experience for customers with SNAP. The current process can be found here: https://sharedsystems.dhsoha.state.or.us/DHSForms/Served/de0349d.pdf

[14] Michigan residents to get $40 daily credit for extended power outages. https://www.bridgedetroit.com/michigan-residents-to-get-40-daily-credit-for-extended-power-outages/

[15] Pacific Power's webpage now has city-level activities detailed under "Our plans and projects." https://www.pacificpower.net/outages-safety/wildfire-safety.html

[16] See our April 30, 2025, UM 2340 Joint Comments to revisit CEP's listening session findings on pages 5 and 6. https://edocs.puc.state.or.us/efdocs/HAC/um2209hac336496026.pdf

X. Evolve mitigation strategies and maximize benefits

Advancing the measures for risk reduction (i.e. reduction in fire consequences, spread, and intensity, avoiding catastrophic fire) is essential to not continue running in place. Under SB 762 (2021), Section 2 directs the PUC to convene Oregon Wildfire and Electric Collaborative (OWEC) workshops to support the development and adoption of "best practices regarding wildfires, including, but not limited to, risk-based wildfire protection and risk-based wildfire mitigation procedures and standards." Section 3 further emphasizes the identification of "reasonable and prudent practices identified through workshops." Given this intent, it is appropriate to move beyond standard utility wildfire mitigation practices and implement the new lessons and best practices identified in OWEC workshops, such as home hardening, adaptive vegetation management, and collaborative governance.[17]

A growing body of research and expert consensus indicates that utilities should expand wildfire mitigation beyond traditional infrastructure, and that reducing the vulnerability of homes and communities is one of the most effective strategies for minimizing wildfire damage, regardless of ignition source. Analysts like Michael Wara, Andrew Dressel, and Frank Graves have emphasized that utilities cannot eliminate wildfire risk through system hardening alone, and that continued reliance on rate-based infrastructure spending risks is exacerbating affordability challenges. Instead, investments in community resilience through home hardening, land use practices, and incentive-based programs offer a more sustainable path to reducing both wildfire consequences and long-term system costs.[18]

As highlighted in Oregon Climate Assessment 2025, "the design and maintenance of a home and the five feet around it, or the home ignition zone, are critical for reducing the chance that a home will ignite," while large-scale vegetation management alone has a limited probability of success.[19] This underscores the need to complement and *balance* traditional utility investments with customer- and community-level resilience measures.

Advocates spoke with staff from Oregon's Building Codes Division to inquire about their previous home hardening grant program, which successfully supported 1,179 applicants with an average award of $4,218. The most common, cost-effective upgrades— such as installing ember-resistant vents, replacing combustible materials, and maintaining defensible space— typically range from $2,000 to $15,000 per home. Hypothetically, a **PacifiCorp** incentive of approximately $2,000 per HFRZ customer could meaningfully accelerate adoption if combined with a state program. At full scale, this would represent a $158 million investment for PAC (without considering personnel costs) across roughly 79,000 high-risk customers. Such an investment should be evaluated in the context of avoided wildfire spread (cost in damages and utility repairs costs), reduced liability exposure, and broader system cost pressures, such as insurance.

Recommendations:

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[17] OWEC Workshop #14 -- Climate Impacts on Ignition and Wildfire Risk and Collaborative Mitigation Opportunities on February 26, 2026: https://www.oregon.gov/puc/pages/eo-20-04-wildfire-mitigation-workshops.aspx

[18] Penrod, E. (2025, March 10). *Insurance — public or private — likely won't stop utility wildfire risks, experts say*. Utility Dive. https://www.utilitydive.com/news/insurance-wildfire-risk-utility-california-funds-climate/741977/; Penrod, E. (2025, October 6). *Shareholder earnings shouldn't be default source for wildfire costs: Brattle*. Utility Dive. https://www.utilitydive.com/news/shareholder-earnings-shouldnt-be-default-source-for-wildfire-costs-brattl/801979/

[19] Fleishman, E., editor. 2025. Seventh Oregon climate assessment. Oregon Climate Change Research Institute, Oregon State University, Corvallis, Oregon. https://doi.org/10.5399/osu/1181. Page 285

- IOUs should provide defensible space and home hardening resources and information to all customers through various avenues including community WMP presentations.
- IOUs should convene with entities like the Oregon's Building Codes Division, Oregon State Fire Marshal, and Firewise USA to explore collaborative home hardening education and incentive programs for customers in High Fire Risk Zones (HFRZs).

Conclusion

This year's historically low water levels set Oregon up for an unpredictable fire season, with a projected increase in burn probabilities and low to high-severity fires throughout the state.[20] Despite climate change having a direct impact on fuel conditions across the state, wildfires will continue to burn even in the best of climatic conditions due to natural ecological processes. The question is not solely how to prevent them, but how to reduce their consequences and amplify community preparedness for wildfire when they inevitably burn.

The incentive structures inherent in the IOU business model favor utility-owned assets, suggesting that regulatory direction is necessary to support community-benefit strategies. It is important to look beyond the traditional utility framework and consider wildfire mitigation measures that extend past infrastructure - such as wires, poles and rights-of-ways - to include approaches that reduce broader societal impacts and promote holistic, community-wide resilience. IOUs are well-positioned to be meaningful players in community wildfire adaptation, through collaborative efforts that reflect best practices and evolving understanding of wildfire risk at a utility-scale. But in order to reduce risk meaningfully, IOUs must engage in mitigation strategies that extend beyond their own assets and infrastructure.

Sincerely,

/S/ Alessandra de la Torre

NW Energy Coalition

/S/ Olivia Awbrey, M.S.

Oregon Citizens' Utility Board

/S/ Sara Wallach

Community Energy Project

[20] Oregon Water Conditions Report, March 24th 2026. Oregon Department of Water Resources. https://apps.wrd.state.or.us/apps/wr/wr_drought/current_updates.aspx

Appendix A

Table 1. Bulk Order example of Company Branded Go Bag Kit items and prices (150 kits)

Item ID	Item name	Stock	# per Kit	Price	Total Cost	Estimated Cost	Final Price	Number Needed to order Quantity	Notes
PRD-J0LTYZ50B	Branded Portable Power bank	0	1	$4.20	$4.20	$630.00	$1,734.60	150	
AK89170	Branded flashlights	0	1	$3.50	$3.50	$525.00	$734.50	150	
S-22762	Triple A batteries	0	3	$0.37	$1.11	$499.50	$2,430.00	450	pack of 24
S-17009	N-95 masks	0	2	$0.95	$1.90	$570.00	$1,339.20	300	pack of 20
				price per kit	10.71				

Here are the links to the items, respectively:

- Branded Portable Power bank: https://www.vistaprint.com/promotional-products/technology/power-banks/span-1200-mah-power-bank
- Branded flashlights: https://www.discountmugs.com/product/ak89170-personalized-halcyon-led-flashlights/
- Tripple A batteries: https://www.uline.com/Product/Detail/S-22762/Batteries/Uline-Ultra-AAA-Alkaline-Batteries
- N-95 masks: https://www.uline.com/Product/Detail/S-17009/Disposable-Masks/3M-8200-N95-Industrial-Respirator

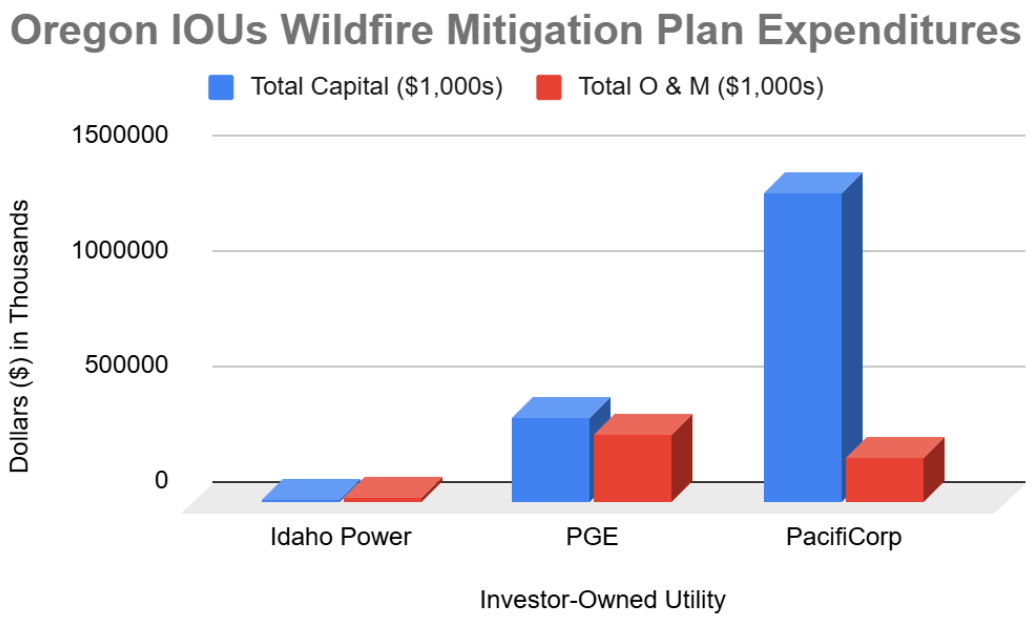

Figure 1. 2026-2028 Oregon IOU Wildfire Mitigation Plans by Investment Type. Figure by Olivia Awbrey, Oregon Citizens' Utility Board. Data Source: UM 2207-2209, Wildfire Mitigation Plans, filed December 31st, 2025.

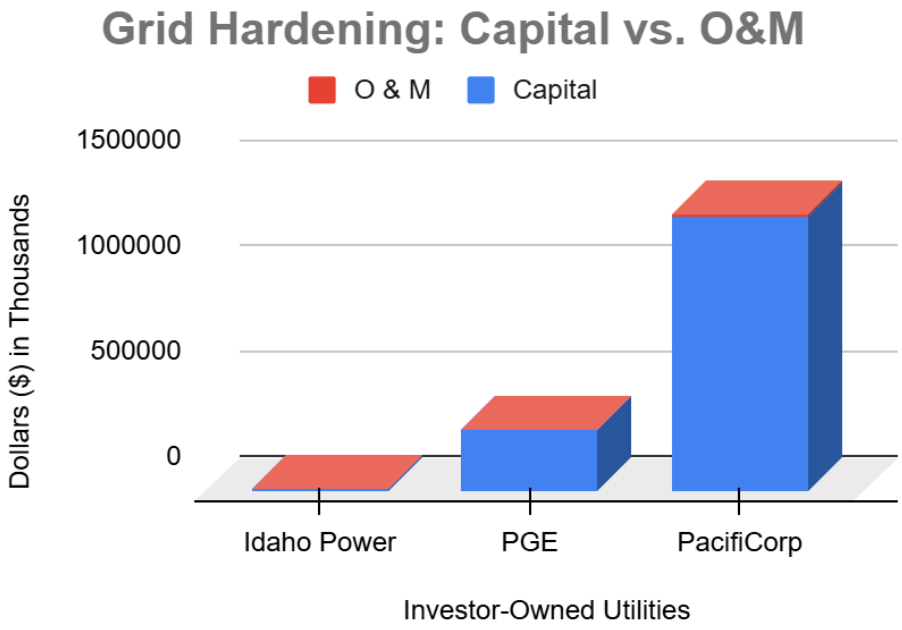

Figure 2. Oregon IOU 2026-2028 Wildfire Mitigation Plans, comparing capital investments with operational & maintenance costs by utility for grid hardening. Figure by Olivia Awbrey, Oregon Citizens' Utility Board. Data Source: UM 2207-2209, Wildfire Mitigation Plans, filed December 31st, 2025.