

**April 21, 2026**

Via Electronic Filing  
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Oregon Public Utility Commission  
201 High St. SE, Suite 100  
Salem, OR 97301-3398

**RE: Comments on Independent Evaluator's Draft Report for Idaho Power's, Portland General Electric's, and Pacific Power's 2026-2028 Wildfire Mitigation Plans (Dockets UM 2207-2209) from NW Energy Coalition, Community Energy Project, Verde, and Oregon Citizens' Utility Board**

The NW Energy Coalition, Community Energy Project, Verde, and Oregon Citizens' Utility Board (Advocates) appreciate the opportunity to provide comments on the Independent Evaluator's (IE) draft report regarding the 2026-2028 Wildfire Mitigation Plans (WMPs) submitted by the the three electric investor-owned utilities (IOUs). We commend the IE for its thorough work and strong recommendations; the report's findings are insightful and significantly enhance our ability to assess and understand the information presented in the RSE templates, data workbooks, and redacted tables. Collectively, these reports provide critical context and contribute to a more comprehensive evaluation of the WMPs and areas for improvement.

At this time, we do not have specific edits, feedback, or concerns with the IE's analysis and recommendations. Rather, we take this opportunity to underscore and elevate the IE's overarching findings across all IOUs, and to reiterate the importance of scrutiny when determining whether to approve these WMPs. Such determinations should be based on the full record in these dockets, including comments from Advocates, Commission Staff, IOUs, and the IE. Given that utilities are currently eligible for automatic cost recovery of these plans through automatic adjustment clauses, the concerns raised by Staff and the IE warrant particular attention, especially regarding whether the proposed expenditures meet the standard for recovery from ratepayers.

The IE echoes concerns we raised in our March 27, 2026 comments: utilities have not sufficiently substantiated their grid hardening budgets with supporting evidence, particularly in light of the magnitude of Pacific Power's proposed expenditures in this category.<sup>1</sup> A consistent concern is the three IOUs' failure to present a reasonable, data-driven justification for its proposed investments, such as covered conductors and undergrounding, including how those investments reduce risk and align with risk-spend efficiency principles in selecting mitigation strategies.

The IE draft reports also highlight the need for greater detail and sophistication / up-to-date modeling in risk-spend efficiency (RSE) and other modeling areas to ensure

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<sup>1</sup> [3/27/26 Advocates WMP Comments p.3-4](#)

accuracy, transparency, and reasonableness in utility investment decisions related to wildfire mitigation. Advocates understand there will be continued development in UM 2340 for RSE maturation, yet it is still worrisome that such huge costs and investments are being planned without proper decision-making tools that reflect the public interest, and the advancement of risk reduction *and* public safety during fire season or wildfire-prone weather conditions. Related to costs, clearer differentiation is needed between utility expenditures that are exclusively for wildfire mitigation– including costs within those categories– and those that are part of broader system investments. This distinction is essential to prevent overlap or double-counting of costs, which could otherwise lead to unnecessary increases for customers, as well as helping to identify where integrated planning can yield co-benefits and result in cost savings.

The IE draft reports highlight a lack of details for community and customer outreach methods and survey responses.<sup>2</sup> The IE specified that there was minimal partner information, especially concerning CBOs, and there was no way of telling if utilities were proactive in these partnerships. There was also no significant analysis of survey responses by different geographic locations or demographic groups nor was survey response differentiated by language. Utilities have also not shared specifics of how they implemented these results into program / outreach changes, rather than stating they ‘influenced change.’ These were all areas of improvements directed by the IE from last year (ALL\_2511). Within the Advocates comments, we recommend utilities develop annual community outreach plans to be filed with the WMPs updates and a follow-up report to be filed after fire season.<sup>3</sup> Our recommendation can easily become the avenue in which the IE’s outreach recommendations can be worked out, such as IE\_IPC\_2606U and IE\_IPC\_2607U, IE-PGE-2612U, and IE\_PP\_2614U and IE\_PP\_2615U.

Additionally, these plans should be developed in collaboration with community groups and local first responders due to their first-hand knowledge of best local engagement strategies. Likewise, direct community engagement creates an opportunity to create integrated solutions that cut across all elements of governmental and private sector interests, acknowledging that climate change caused wildfires are not just an issue for utilities to solve.<sup>4</sup> Filing annual outreach plans would allow utilities to go into further analysis so community-based programming has the reach, granularity, and effectiveness to help communities during an already stressful season–and likely beyond wildfire to support responses to other catastrophic events. If possible, Advocates would benefit from the IE’s thoughts on our March 27, 2026 comments and recommendations to better refine our scope and identify areas of alignment.

Finally, we continue to emphasize the importance of de-siloing utility plans through integrated system planning approaches. Utility planning efforts should be coordinated to

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<sup>2</sup>[4/7/26 IE Draft Report for PGE WMP p.44-47](#) – Referencing the IE’s PGE report, though this observation is also made in the IE’s Draft report for Pacific Power and Idaho Power.

<sup>3</sup> [3/27/26 Advocates Comments p.8](#)

<sup>4</sup> See the recent report from California concluding there must be integrated solutions that cut across all elements of governmental and private sector interests in order to adequately mitigate and address wildfire catastrophe, California Earthquake Authority, *Enhancing California’s Resiliency to Natural Catastrophes: Senate Bill 254 (2025) Study Report* (April 7, 2026), available at: <https://www.cawildfirefund.com/sites/wildfire/files/documents/2026/sb-254-natcatresiliencyreprt-4-7-26v3.pdf>.

address wildfire mitigation, capacity needs, and broader state policy objectives, such as those outlined in HB 2021 (2021). For example, battery storage can reduce peak load while also enhancing system resilience, especially during fire season where sensitive settings are turned on and temperatures run hot increasing demand in AC usage; similarly, proposals such as Portland General Electric's Virtual Power Plant<sup>5</sup> demonstrate how distributed energy resources can support multiple objectives. These cross-cutting strategies illustrate the value of moving beyond business-as-usual siloed planning to capture opportunities that improve emergency preparedness, enable flexible load management, and advance compliance with state law.

Year after year, Advocates have engaged in WMPs with little change to the utility's larger strategy to take care of its customers and meaningfully demonstrate how their investments are reducing wildfire ignition risk. PUC Staff has expressed similar frustrations with utilities' wildfire mitigation plans, particularly when it comes to the important cost-effectiveness showing and analysis. Advocates recommend the Public Utility Commission consider auditing the companies' planning processes—or at a minimum utilities' wildfire mitigation strategies and costs—, consider re-evaluating the use of automatic adjustment clauses, and establishing structures and reporting that moves the needle on utility transparency and reasonable spending.

Sincerely,

*/s/ Alessandra de la Torre*  
NW Energy Coalition

*/s/ Sara Wallach*  
Community Energy Project

*/s/ Anahi Segovia Rodriguez*  
Verde

*/s/ Jennifer Hill-Hart*  
Oregon Citizens' Utility Board

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<sup>5</sup> See <https://portlandgeneral.com/blog/virtual-power-plant-supports-grid-reliability>.