

**May 27, 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 Staff'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 Staff's draft reports on the electric IOU 2026-2028 wildfire mitigation plans (WMPs). We point to our previous comments and recommendations this year in UM 2207, UM 2208, and UM 2209 to be considered by Staff as they finalize their report.<sup>123</sup>

Overall, Staff's draft reports reinforce the need for the IOUs to better justify and substantiate their wildfire mitigation decisions with clear, evidence-based analysis. A number of the recommendations apply across all three IOUs and are expected to be addressed by the 2027 WMP Update, with a few long-term recommendations applying to the next base plan. These recommendations include better distinguishing wildfire-specific mitigation investments from general system-wide operational spending; improving and re-testing models to incorporate climate change impacts and maintain updated HFRZs; strengthening pilot technology reporting and cost-benefit analyses; and establishing clearer criteria for whether projects should proceed, pause, or be suspended. Staff also recommends improvements to community outreach and communications, particularly with medical certificate holders, as well as enhanced partnerships and resources for vulnerable communities.

We appreciate Staff incorporating our comments in their recommendations to expand community-focused wildfire safety efforts, including providing home hardening, defensible space, community preparedness materials, and current fire-location and situational awareness

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<sup>1</sup> March 27, 2026 Advocate [comments](#)

<sup>2</sup> April 21, 2026 Advocate [comments](#)

<sup>3</sup> May 7, 2026 Advocate [comments](#)

tools at local events. From speaking to community members, we found that 47% of people gain their emergency preparedness from community based organizations.<sup>4</sup> By increasing support of these organizations and programs, we can better prepare communities for wildfire events. We also support recommendations encouraging community partners to share broader preparedness information and incorporate third-party wildfire safety resources into customer-facing platforms. In addition, we appreciate the emphasis on capturing and communicating sensitive setting changes and associated impacts to customers, as well as recommendations for third-party verification of industry collaboration efforts and ranking results generated from various wildfire risk models.

As advocates, we recognize the amount of time and work that goes into the creation of these WMPs and their subsequent reports. We would like to amend our earlier recommendation of having a new separate community outreach report, to instead update the content of the current PSPS reports. Within the PSPS reports, the utilities should also provide information on partner engagement, communication cadence, qualitative insights (to advance more narrative on community forums and FAQs), etc.<sup>5</sup> By updating the content of this report, we are able to transparently see how utilities are communicating PSPS events, and sensitive setting changes and impacts, with their partners and community. Even in years where there are no PSPS, these updates can highlight the work the utilities are doing to foster community preparedness during wildfire season as outages still occur and continue to gather data on sensitive settings. Partnerships with CBOs are critical to help facilitate and enhance this type of work and expand the reach of preparedness to vulnerable groups.

As we revisit last year's Staff reports,<sup>6</sup> Advocates recommend stronger language in this year's final reports to ensure that the three IOUs and Staff continue to mature and strengthen the rigor, transparency, and scrutiny applied to these plans. This includes strengthening Staff recommendation for the Commission to consider conditions for approval, as described in our May 7th comments, to ensure ratepayer funds are guaranteed only for wildfire mitigation investments that are evidence-based, risk reducing, and determined to be reasonable, as well as, exclusively associated with wildfire risk reduction initiative activities, as outlined in various Staff recommendations such as ALL\_2602U, ALL\_2617U, ALL\_2618U, ALL\_2619U, and

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<sup>4</sup> Community Energy Project July 1, 2025 [Listening session](#)

<sup>5</sup> See our March 27th Advocates [Comments](#) pages 8-10 for further details we recommend to be encompassed in the PSPS reports.

<sup>6</sup> 2025 Staff reports for [Pacific Power](#), [Idaho Power](#), and [PGE](#)

ALL\_2620U. This principle is foundational to SB 762<sup>7</sup> and the Commission’s responsibility to safeguard ratepayer funds. Advocates remain concerned by the findings from both Staff and the Independent Evaluator indicating that the IOUs must better demonstrate and substantiate their work. To that end, it remains unclear how the AAC would be affected– or how ratepayer funds would be protected– if the IOUs do not meet Staff recommendations within the given timeline. We ask, *what mechanisms keep the IOUs accountable?* We think it is critical that the Commission adopt Condition #2 related to the utility AACs and would appreciate it if Staff responds to this recommendation in their Final Report due June 10, 2026.

We continue to appreciate the hard work Staff, utilities, stakeholders, and other participants put into these processes, and acknowledge that we are continuing to learn and make improvements. We recognize and appreciate the utilities’ willingness to continue to refine the readability of the WMPs and their welcomeness to suggestions, such as “office hours”, to have consistent and direct conversations with stakeholders during WMP evaluation. It is critical we ensure that utilities are making strategic and affordable wildfire mitigation, adaptation, and restoration investments, while meaningfully collaborating and working strategically with communities to keep them safe and informed.

Sincerely,

/s/ Alessandra de la Torre  
NW Energy Coalition

/s/ Anahi Segovia Rodriguez  
Verde

/s/ Sara Wallach  
Community Energy Project

/s/ Jennifer Hill-Hart  
Oregon Citizens’ Utility Board

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<sup>7</sup> [SB 762](#) Section 3(b) “Identify a means for mitigating wildfire risk that reflects a reasonable balancing of mitigation costs with the resulting reduction of wildfire risk.”