October 14, 2022
Via Electronic Filing

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

Re: Comments on Resiliency Planning Standards and Practices
OPUC Docket UM 2225

The NW Energy Coalition, Multnomah County Office of Sustainability, Rogue Climate, The Sierra Club, Oregon Citizens' Utility Board, Oregon Solar + Storage Industries Association, Metro Climate Action Team, and Coalition of Communities of Color (the "Energy Advocates") appreciate the opportunity to provide the below comments on Staff's work on Resiliency Planning Standards and Practices and on the GRID Modernization Laboratory Consortium's (GMLC) Consideration for Resilience Guidelines for Clean Energy Plans (CEP). We appreciate Staff taking the opportunity to receive assistance from the Department of Energy (DOE) Grid Modernization Lab Consortium (GMLC) on the highly technical work of investigating industry standards and best practices for risk-based examination of resiliency opportunities.

It is critical for utilities to leverage this first CEP to move the needle on resiliency beyond what they may have already explored in distribution system planning. Climate change has already increased the rate of disruptive events and will continue to do so rapidly. As we have seen over the last three years, vulnerable community impacts have dramatically increased; the frequency and duration of disruptive events will only continue to impact these communities negatively. That said, we strongly encourage utilities to incorporate the approaches and methodologies outlined in the GMLC Report into their resiliency work for this CEP and in other forums. We understand that the PUC may not issue stand-alone, resiliency-focused guidelines for the first CEPs. If that is the case, we encourage the Commission to leverage the important work in the GMLC Report and provide durable guidance for future CEPs.

In these comments, we highlight what we consider short-term or immediate resiliency priorities for Staff to include in their resiliency guidance for the March 2023 utility Clean Energy Plan (CEP) filings. We recognize that not all resiliency priorities can be adopted in the near term, therefore, we include a section on long-term priorities that should be taken into consideration for further work by the utilities post-March of 2023.

Near-term Priorities (now through March 2023)

Utilities should, through collaboration with stakeholders and the PUC:

1. Focus on the community-based renewable energy (CBRE) acquisition study.
2. Prioritize integration of widely accepted resiliency projects wherever possible in CEPs.
3. Perform a high-level assessment of historical, existing and future threats.
    a. Leverage data from other sources and dockets, such as the Wildfire Protection Plan.
4. Establish at least one resilience community benefit indicator and metric(s).

Long-term Priorities (March 2023 and beyond)
Utilities should, through collaboration with stakeholders and the PUC:

1. Continue jurisdiction-wide risk assessment coupled with climate change vulnerability assessment.
    a. Leverage new data from the Distribution System Planning Process
    b. Conduct any additional studies for this assessment.
2. Map vulnerable communities
    a. Leverage data from other dockets, such as the Wildfire Protection Plan.
    b. Leverage data from existing vulnerability assessment maps
3. Engage stakeholders to develop threat-risk prioritization.
4. Formulate zone of tolerance weighting and scoring for projects.
5. Further develop resilience-specific CBIs and metrics.

NEAR-TERM RESILIENCE PRIORITIES

We appreciate the resiliency-focused guidelines that Staff incorporated in the Roadmap Acknowledgment and Community Lens guidelines. We support those guidelines and strongly encourage utilities to prioritize their resiliency analysis and to apply the learnings from that analysis throughout the CEP and in project selection as appropriate. Additionally, we encourage utilities to prioritize the actions we outline below as they prepare to file their first CEP. They can strengthen and further refine their analysis, as well as incorporate more elements of resiliency analysis in future CEPs or perhaps in stand-alone resiliency plans.

Focus on CBRE Acquisition Study

Energy Advocates encourage the utilities to prioritize the launch and completion of their CBRE acquisition studies. This study is of utmost importance at this stage as it will directly inform resiliency project opportunities and CBRE build-outs that will result in direct benefits to vulnerable communities and the energy system as a whole. We encourage utilities to prioritize the thorough assessment of CBRE opportunities in their environmental justice and most energy burdened communities. Results from this study

should inform plans and the actual build out of CBRE projects, especially in EJ and energy burdened communities.

Prioritize Integration of Widely Accepted Resiliency Projects Wherever Possible in CEPs

Energy Advocates continue to urge the utilities to prioritize the integration of widely accepted resiliency projects in their CEPs. Prioritization of these projects should include increased energy-efficiency and the integration of distributed energy resources, in this respective order. Project location should prioritize communities which have experienced underinvestment and other otherwise vulnerable communities/households.

Utilities, to the furthest extent possible, should prioritize the build out of community based renewable energy (CBRE) and ensure that community ownership over these projects are given primary consideration. The utility study to establish CBRE acquisition targets should be streamlined with this work.

Equity Scoring for Projects
Utilities should develop and utilize an equity scoring criteria for their project selection process. For a project to score well on equity, it should first and foremost be built in and endorsed by communities which have historically experienced underinvestment or other disproportionately negatively impacted communities. Such projects should add community benefits that cover, *inter alia*, community resilience, positive economic impact—including community ownership, and positive health and environmental benefits. Further detail on equity scoring criteria can be further developed with each utility's stakeholders. The inclusion of an equity metric and score should be seriously considered and applied across all utility project scoring criteria.

Formulate an interim Zone of Tolerance Framework

Energy Advocates encourage the utilities to formulate a zone of tolerance framework that identifies their various communities' different capabilities to endure adverse impacts from electricity service disruptions, and then develops corresponding weighting and scoring for projects. Energy Advocates are especially supportive of this work as we have continuously advocated for utilities to grow their understanding and ability to tailor services based on their communities' unique needs. Any work done to integrate equity scoring criteria for project selection (something we mention in near-term priorities above) should be integrated with zone of tolerance scoring and weighting, where appropriate.

We recognize that utilities are working with tight timelines before filing their first CEPs. However, understanding zone of tolerance for their communities, and prioritizing resiliency investments accordingly, is crucial work to advance energy justice in the state of Oregon. As an interim step before more fully fleshing out this analysis in future CEPs, or potentially even in stand alone resiliency plans, utilities could partially rely on EJSCREEN if they feel they lack the necessary data. Utilities should also rely on the resiliency-related analysis that they are to include in CEPs under Staff's recommendations for CEP guidelines.[1]

Energy advocates support the GMLC Report's characterization of zone of tolerance, with some caveats. For example, the GMLC Report identifies a list of indicators that influence communities zone of tolerance, including:

- households' need for utility service,
- preparedness level,
- existence of substitutes,
- possession of social capital,
- previous experience with disasters, and
- risk communication

Energy advocates recommend adding a few more indicators, such as, *inter alia*, customer medical conditions, access to economic capital, energy burden, and environmental quality (as it relates to placement/removal of harmful or potentially harmful utility assets). These are important factors to consider in an interim zone of tolerance framework. Energy Advocates identify the development of the zone of tolerance framework as a high priority.

Perform Assessment of Historical, Existing and Future Threats

Energy Advocates encourage each utility to, between now and March of 2023, perform a high-level assessment of historical, existing, and future threats to its system and how these threats impact its customers. For this assessment, utilities can rely on the data sources that the GMLC Report highlights.[2] The utilities should also utilize the data that they have gathered through the development of their distribution system and wildfire protection plans to establish this high-level assessment. From now through March, we

[1] Staff Report at 33 (Sep. 28, 2022).
[2] *See* GMLC Resilience Report listing risk assessment data including the Oregon Guidebook for Local Energy Resilience from the Oregon Department of Energy (ODOE) (ODOE 2019) and the U.S. Department of Energy (DOE) State and Regional Energy Sector Risk Profiles, among other sources.

expect that utilities should be able to perform this assessment for at least two communities highly susceptible to resiliency events, such as those in wildfire prone areas, before doing a system-wide assessment. The CBRE study should also feed into this study. We encourage utilities to engage in this assessment to help with the development of their resilience community benefit indicators and metrics.

Establish at Least One Resilience Community Benefit Indicator and Metric(s)

Energy Advocates encourage the utilities to establish at least one resilience community benefit indicator (CBI) and its respective metric(s). Results from the CBRE study can feed into this exercise. For example, after understanding areas with highest probability of locating CBRE projects, the utilities may establish a CBRE acquisition target (i.e. in its RFP). In this case, the CBI could be classified as increased energy security, while the metric would be the CBRE RFP target and the extent to which the target is met. Another option for a resilience community benefit indicator is fewer customers experiencing long-duration power outages as a result of wildfires.[3] This CBI would be most appropriately developed after the high-level risk assessment in the community most prone to wildfires. The metrics for this CBI can include build out of community resilience centers in these areas, integration of distributed energy resources (DERs) and batteries so that homes[4] or community facilities are able to have some level of continued electricity access during public safety power shutoffs (along with other benefits of DERs), etc.

Energy Advocates continue to encourage utilities to work with their communities to develop CBIs and metrics that are most appropriate for each community, while also offering opportunities for collaboration on the development of CBIs and metrics.

Near-term Resilience Conclusion

In sum, Energy Advocates encourage utilities to focus on key priority areas between now and the first CEP filing, including:

1. Launching and completing the CBRE study to identify CBRE opportunities and acquisitions targets and integrating an equity criteria to project scoring metrics.
2. Responding to the CBRE study by including plans to build more CBREs within environmental justice and other vulnerable communities. This may happen through prioritizing CBREs in RFPs, especially community-owned or co-owned CBREs.

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[3] Ideally this metric would be used in conjunction with information about the zone of tolerance for that community to provide information of the degree of current vulnerability to other factors that the community may be experiencing. .

[4] I.e. the homes of medically vulnerable customers experiencing other factors of vulnerability.

3. Performing high level risk assessment in most risk-prone/vulnerable communities (as time allows).
4. Developing at least one resilience community benefit indicator and its corresponding metric(s).

LONG-TERM RESILIENCE

Following the first CEPs, utilities should undertake a thorough resiliency planning analysis that follows the process outlined in the GMLC Report. They should do so for each CEP unless they are undertaking resiliency planning more formally as its own process. The PUC should adopt guidelines for this planning based on the GMLC Report findings. We include below some key aspects that we expect such analysis should prioritize:

Continue Jurisdiction-wide Risk Assessment Coupled with Climate Change Vulnerability Assessment

Energy Advocates encourage the utilities to take on jurisdiction-wide risk assessments and to couple this study with a climate change vulnerability assessment.[5] Other neighboring states' utilities have engaged in these studies, and we encourage PGE and PacifiCorp to refer to them for lessons learned and best practices while recognizing that communities in Oregon may be vulnerable to impacts that are different from communities in other states.

One option for Oregon utilities is to adopt the integrated approach.[6] Through this approach, utilities would identify historical, existing, and future risks and climate hazards, run a screen of utility and its communities sensitivities, including those of operations, assets, and planning, then identify portfolios for risk and climate hazard adaptation and mitigation actions. Adaptation actions would include projects that allow the utility and its respective communities to adapt and therefore become more resilient to existing and future threats. An example of this type of action would include system hardening and the integration of DERs. Utilities also need to analyze investments in distribution system resiliency given that most outages occur at the distribution level. Preventing, rather than responding to, outage risks may be the most cost-effective

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[5] *See* GMLC report stating: Climate vulnerability assessments are increasingly being performed by states and utilities to identify and characterize risks. Assessments ultimately consider the exposure of critical assets or operations to an adverse climate event or trend, the probability of damage to assets or disruption to operations as a result of exposure to those climate threats (or risks posed by threat), and the likely consequences if the event were to occur (severity of impacts).

[6] *See* Con Edison Climate Change Vulnerability Assessment https://www.coned.com/-/media/files/coned/documents/our-energy-future/our-energy-projects/climate-change-resiliency-plan/climate-change-vulnerability-study.pdf.

resiliency investments a utility can make in its CEP. Mitigation actions, on the other hand, would include, for example, the shift away of fossil fuel resources so that further impacts from climate change are not exacerbated, as well as on the ground community mitigation in regards to both planned and unplanned power outages to increase community resilience when the power grid is unreliable. This can look like activating Community Resource Centers (CRCs) mentioned in the Wildfire Protection Plans during any outages, not just during Public Safety Power Shutoffs (PSPS).

Risks and climate hazards that should be analyzed in these studies include, among others:

1. Wildfire events
2. Cold weather events
3. Sea level rise and storm surge
4. Heat and humidity impacts
5. Precipitation
6. Seismic events

Utilities should refer to the best available science to gauge future risks and climate hazards. The IPCC reports can be utilized in this analysis.

Map Vulnerable Communities

Utilities should map their vulnerable communities so that targeted work can readily occur. As the GMLC report states, California and Washington have already engaged in this exercise, so lessons learned and best practices can be gleaned from these states. Vulnerable community maps would allow utilities to easily identify communities where resiliency projects should be prioritized, among other utility services.

Utilities should be able to leverage data from existing mapping tools and data sources, such as EJScreen, or the Greenlink Equity Map and census data and maps to develop their vulnerable community maps. Some utilities have already done some of this work through the DSP process and can translate development in that workstream here.

Engage Stakeholders to Develop Threat-risk Prioritization

After developing vulnerable community maps, utilities should engage with their most vulnerable communities to develop threat-risk prioritization. This would entail identifying which threats should be avoided or averted first to those that are less urgent to address, thereby, developing a utility and customer informed scale to address utility and community resilience measures. The GMLC report highlights New York and California’s

work on this front. There are likely lessons learned and best practices from these states that PGE and PacifiCorp can consider.

Increase Robustness of Zone of Tolerance Framework: Identify Community Zone of Tolerance & Develop Corresponding Zone of Tolerance Weighting and Scoring for Projects

Energy Advocates encourage the utilities to formulate a zone of tolerance framework as a near-term priority. However, we are aware that the degree of robustness that may be desirable for that work will likely not be possible in the tight timelines for the first utility CEPs. For that reason, we encouraged utilities to rely on readily available tools and data sources for that first CEP. However, it is critical that a more robust zone of tolerance analysis be incorporated into utilities' CEP resilience analyses moving forward.

We encourage utilities to consider the GMLC Report indicators for zone of tolerance and recommend additional important indicators. One example of increased robustness in this analysis is for the utility to increase the number of indicators considered for its resiliency-analysis in future CEPs.

A robust zone of tolerance framework is an important tool to ensure that utilities are furthering community resilience and allocating their resiliency investments equitably. As a result, this work should not be neglected in the first CEP, and should be enhanced in future CEPs.

Further Develop Resilience-specific CBIs and Metrics

As utilities go about implementing mandates of HB 2021, and infusing more community-based renewable energy resources to the grid, it is likely that community needs will be evolving. In order to maintain the pace of progress, CBIs and metrics will need to evolve as well. Energy advocates, therefore, encourage utilities to develop a full suite of community benefit indicators and metrics, and to continue to update them as community needs change.

Conclusion on Long-Term Resilience

In sum, Energy Advocates would encourage the PUC to rely on the GMLC Report to adopt resilience planning analysis, and utilities to engage in long-term—post March 2023 and beyond—wholistic resilience planning and corresponding actions by:

1. Continuing jurisdiction-wide risk assessment and coupling this assessment with a thorough climate change vulnerability assessment. Utilities should analyze

historical and present threats with existing data sources, and future risk and climate hazards using the best available science.
2. Map vulnerable communities to help with targeted project placement and other utility services.
3. Engage with their most vulnerable communities, other implicated stakeholders, and the PUC to develop threat-risk prioritization.
4. Formulate zone of tolerance framework, identify communities' zone of tolerance, and develop corresponding zone of tolerance weighting and scoring for projects.
5. Develop a full suite of community benefit indicators and metrics and continuously update CBIs and metrics with input from PUC and stakeholders.

Energy Advocates thank staff for their thorough and careful consideration of this important topic as it relates to HB 2021 and overall Oregon energy system-wide resilience. We look forward to additional opportunities to support Staff's efforts to robustly implement this landmark decarbonization and energy justice legislation.

Respectfully submitted this 14th day of October 2022,

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