

October 14, 2022

***VIA ELECTRONIC FILING***

Public Utility Commission of Oregon  
Attn: Filing Center  
201 High Street SE, Suite 100  
Salem, OR 97301-3398

**Re: Docket UM 2225—PacifiCorp’s Response to the OPUC’s Resiliency Planning Standards and Practices Report**

PacifiCorp d/b/a Pacific Power (PacifiCorp or Company) respectfully submits these comments in response to the Department of Energy’s Grid Modernization Lab Consortium Report (GMLC Report) on resiliency planning standards and practices.<sup>1</sup>

Focusing on HB 2021’s requirement to include “a risk-based examination of resiliency opportunities that includes costs, consequences, outcomes and benefits based on reasonable and prudent industry resiliency standards and guidelines established by the Public Utility Commission,”<sup>2</sup> the GMLC Report will serve as a thoughtful and helpful clearinghouse of information for future Commission deliberations.

Given the breadth and depth on what could be appropriate resiliency opportunities, the Commission should take a light touch on this issue for initial utility clean energy plans (CEP). This is underscored by the lack of industry consensus on resiliency analyses; for example, the GMLC Report only discusses three states that have had initial resiliency discussions (California, Washington, and Oregon). Whatever the Commission decides on review of this initial report, stakeholders should have the subsequent opportunity to provide input on any specific Commission resiliency recommendations (whether in this investigation, or future rulemaking or contested case proceedings).

PacifiCorp thanks the Department of Energy (DOE), Staff, and the Commission for the GMLC Report, and recommends the following modest comments discussed below.

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<sup>1</sup> *In re OPUC’s HB 2021 and CEP Investigation*, Dkt. UM 2225, Resiliency Planning Standards and Practices (Sept. 7, 2022).

<sup>2</sup> HB 2021 § 4(4)(c).

## **I. Discussion**

### **A. Suggested Resiliency Planning Processes**

The Company generally supports the DOE’s proposed resiliency planning analysis processes: define resiliency goals; develop system and resilience metrics; characterize threats and their probabilities and consequences; and evaluate effectiveness and cost of alternative resilience measures for avoiding or mitigating threats. Given HB 2021’s requirements to broaden stakeholder engagement with environmental justice communities and underrepresented black, indigenous, people of color (BIPOC) voices, PacifiCorp recommends that this process should be vested with Utility Community Benefits and Impacts Advisory Group (UCBIAG) working groups. Those discussions would provide the appropriate forum to investigate, develop, and ultimately stand up, resiliency metrics and processes that are community-utility-specific.

### **B. Initial PacifiCorp Resiliency Definition**

CEPs must include a “risk-based examination of resiliency opportunities that includes costs, consequences, outcomes and benefits based on reasonable and prudent industry resiliency standards and guidelines established by the Public Utility Commission.”<sup>3</sup> The Commission shall acknowledge a utility CEP if, among other things, the plan demonstrates the “effect of the plan on the reliability and resiliency of the electric system.”<sup>4</sup>

While HB 2021 includes several definitions of “energy resilience,” “community energy resilience,” and “community energy resilience project,” those definitions are only specific to the Community Renewable Energy Project Grant Program administered by the Department of Energy.<sup>5</sup> As such, the Commission has broad latitude to consider if, and when, it should adopt a definition of “resiliency” for CEP purposes.

Given that resiliency definitions are in their initial stages, the Company appreciates the DOE’s aggregation of various definitions, and expects this information will greatly inform future resiliency definition discussions at the Oregon Commission.

Until there is more broad Commission, stakeholder, and industry consensus reached through the UCBIAG working groups, the Company intends to adopt the same or similar resiliency definition that it adopted to implement the State of Washington’s resiliency requirement for its first CEP. Washington requires utilities to adopt a resiliency customer benefit indicator for its clean energy policies.<sup>6</sup> To that end, the Company defined its resiliency metric customer benefit

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<sup>3</sup> HB 2021 § 4(4)(c).

<sup>4</sup> *Id.* § 5(2)(c).

<sup>5</sup> *Id.* § 29 (“As used in sections 29 to 32 of this 2021 Act:”).

<sup>6</sup> WAC 480-100-640(4) (requiring resiliency customer benefit indicators).

indicator as benefits that “reduce the frequency and duration of outages.”<sup>7</sup> The Company intends to use this definition for its first CEP and will serve as a meaningful starting point for future discussions on how to appropriately define resiliency.

### **C. Risk Assessment Strategies**

HB 2021 requires that utility CEPs include “a risk-based examination of resiliency opportunities that includes costs, consequences, outcomes and benefits on reasonable and prudent industry resiliency standards and guidelines.”<sup>8</sup>

PacifiCorp greatly appreciates the DOE’s efforts to aggregate various risk assessment methods, including: leveraging existing risk assessments from federal, state, and local organizations; performing quantitative assessments of historical threats; engaging stakeholders to develop a threat-risk prioritization; using bowtie risk assessment processes; and conducting climate change vulnerability assessments. This taxonomy of risk assessment could help the Commission determine if, and to what extent, it should require strategies for future utility CEPs.

That said, PacifiCorp does not currently engage in this magnitude of comprehensive risk assessment for CEP purposes. This would require substantial time and resources and could reasonably be expected to encompass utility wildfire or extreme weather mitigation planning. The Company welcomes the opportunity to begin discussing and implementing broad scale risk assessment strategies, and that this process will greatly inform and develop future resiliency planning and metrics.

### **D. Accounting for Variations in Hardship, Consequences and Costs Experienced**

Given that the UCBIAG working groups are in their infancy, PacifiCorp’s resiliency metrics and analyses will be incorporated more robustly in future CEPs. For the initial CEP, PacifiCorp intends to include the same or similar FERC reliability metrics that the GMLC Report considers in its discussion on accounting for variations in hardship, consequences, and costs experienced. This is an appropriate baseline because it starts from well-known and broadly vetted reliability metrics and allows utilities and communities time to develop tailored resiliency processes based on stakeholder processes.

This also aligns with the Company’s metrics in Washington to implement that state’s similar resiliency requirements. The Company defined and utilized well-known System Average Interruption Duration Index (SAIDI), System Average Interruption Frequency Index (SAIFI),

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<sup>7</sup> *In re PacifiCorp’s 2021 Clean Energy Implementation Plan*, Dkt. UE-210829, Final CEIP, at 28 (Dec. 30, 2021) (available [here](#)).

<sup>8</sup> HB 2021 § 5(4)(c).

and Customer Average Interruption Duration Index (CAIDI), reliability metrics to inform the Company's processes around resiliency planning.<sup>9</sup> The Company anticipates the same baseline metrics for its first CEP.

Based on further Company discussions, PacifiCorp may also consider adopting the Momentary Average Interruption Frequency Index (MAIFI), Customers Experiencing Multiple Interruptions of n or More (CEMIn), Customers Experiencing Long Interruption Duration of t or More Hours (CELIDt), Customers Experiencing Multiple Momentariness (CEMM), and Customers Experiencing Multiple Sustained and Momentary Interruptions (CEMSMI) standards as resiliency metric for its first CEP. While the Company does not currently track or include CEMIn, CELIDt, CEMM, or CEMSMI for reliability project planning purposes, this data could be derived from existing databases for use in grid resiliency programs.

#### **E. Opportunities for Investing in Resilience, Enhanced Reporting, Practical Considerations and Opportunities**

The Company greatly appreciates the DOE's efforts to aggregate various resiliency investment categories (emergency repairs, aging infrastructure replacement, public works relocations, reliability, resiliency, customer service requests, system expansion, grid modernization, and information technology), as well as specific types of examples (microgrids and resiliency hubs), and utilities that have started to implement resiliency investment practices (Xcel Energy and Con Edison), and third-party literature. This discussion will greatly inform future Commission discussions regarding appropriate resiliency investment opportunities.

The Company is also open to discussions for enhancing reporting requirements on major events but is not clear if utility CEPs are the appropriate venue for this discussion. The Company recommends the Commission off-ramp this issue from the current investigation, and possibly revisit it in future discussions on broader risk assessment strategy workstreams, that could reasonably include enhanced reporting requirements.

The Company greatly appreciates the DOE's efforts to develop a general analytical framework to describe distributed energy resources (DERs) resiliency investment considerations (including level of service, type of extreme events, presence of enabling equipment, reliable maintenance and operations support, and availability when needed), as well as the traits that DERs can provide for resiliency purposes (dispatchability, islanding capability, siting at critical loads/locations, fuel security, quick ramping, grid services, decentralization, and flexibility). These frameworks should helpfully inform future Commission and utility discussions on these issues.

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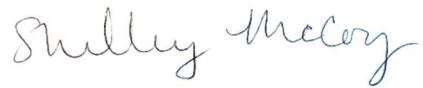
<sup>9</sup> *Id.* at 35.

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## **II. Conclusion**

PacifiCorp appreciates the DOE's diligent efforts with the GMC Report, and respectfully requests the Commission consider the comments provided above.

Sincerely,

A handwritten signature in cursive script that reads "Shelley McCoy".

Shelley E. McCoy  
Director, Regulation  
PacifiCorp