

# Wildfire Mitigation Rulemaking – Phase II

## Docket AR 638 Revised Scope



# MEETING AGENDA

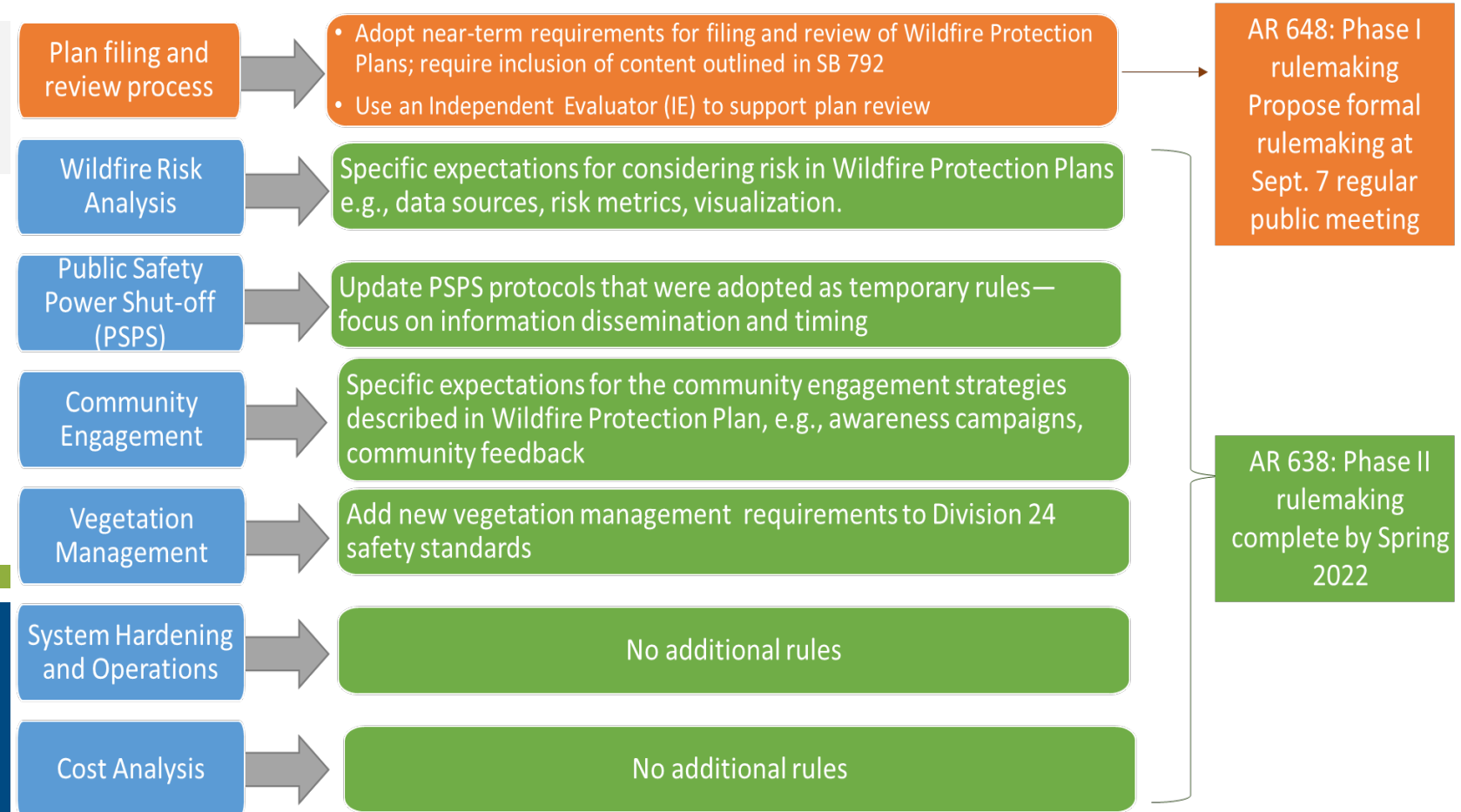
- 1:00 pm – 1:05 pm: Welcome
- 1:05 pm – 1:15 pm: Rulemaking strategy overview and phasing discussion
- 1:15 pm – 1:20 pm: Phase II schedule review
- 1:20 pm – 2:50 pm: Phase II scope review
  - 1:20 – 1:30 *Risk analysis*
  - 1:30 – 2:00 *PSPS Protocols*
  - 2:00 – 2:30 *Community Engagement*
  - 2:30 – 2:50 *Vegetation Management and System Hardening*
- 2:50 pm – 3:00 pm: Additional questions, comments, scoping issues

# STRATEGY REVIEW

## Goal

- Simplify and Streamline
- Address SB 762

## AR 638/648 strategy proposal



# PHASE II SCHEDULE REVIEW

- 9/27/2021 – Draft rules finalized and released to Stakeholders
- 10/11/2021 – Workshop on draft rules
- 10/18/2021 – Written comments due
- 11/11/2021 - Staff memo proposing final draft rules
- 11/16/2021 - Public Meeting to move to formal rulemaking
- Q2 2022 - Commission adopts permanent rules



# RISK ANALYSIS

*Adding to the Phase I rules to articulate specific expectations for considering risk in Wildfire Protection Plans.*

Specific issues:

- Direction to use the most up-to-date data practicable from trusted sources
- Direction to use certain types of data (e.g., meteorological, topographical)
- Specify some sources or options for sources:
  - Meteorological data from NOAA
  - Must use at least one of these sources of topographical wildfire risk data:
    - ODF Wildfire Risk Explorer
    - BLM GIS models,
    - USFS Quantitative Wildfire Risk Assessment
    - Specific third party studies commissioned by the utility
- Direction to utilize certain methods
  - Requirement to confer with other state agencies in developing
  - Requirement to develop and describe metrics used to measure/describe risk across system
    - Includes a definition of high fire risk consequence areas and extreme fire risk consequence areas
  - Requirement to evaluate risk to utility service area/communities and utility equipment (including but not limited to)
  - Format is a map
- Requirements for detail presented in plan
  - Describe analytical methods
    - Include description of whether/how ODF, BLM, USFS data was used
  - Describe utility data
  - Describe how risk analysis is used for various things e.g., investment decisions, operational decisions, PSPS



# PSPS

***Creating a new permanent division for PSPS protocols that builds off of temporary rules as necessary with a focus on information dissemination and timing. Note: Phase I rules include procedural requirement to discuss PSPS plans in Wildfire Protection Plans—no proposed additions or changes to that in Phase II.***

Specific issues:

- Requirements for preparation
  - Preparation activities with local public safety partners e.g., table top exercises
  - Contact information sharing with public safety partners and critical facilities
  - Data sharing e.g. data points, data type and format, conditions for calling a PSPS
    - Who gets what info in what format in preparation for PSPS season?
- Requirements when a PSPS is anticipated to occur
  - Notifications – shift focus to notifying public safety partners and critical facilities who will notify customers/community through existing technologies and systems
    - Prioritization, timelines
    - Content of notifications
    - Methods to reach different populations
      - Public safety partners (incl. OPUC)
      - Critical facilities
      - Customers – focus on inbound as minimum requirement (web, phone), but could include optional direct outbound outreach to vulnerable (medical, self-identified)
        - Any other utility requirements like press release, social media
      - Supporting public safety partners’ efforts to identify vulnerable customers to the extent possible/legal
  - Data sharing
    - Requirements for freshness/granularity/format for sharing data when PSPS is anticipated e.g., require a real-time portal?
  - Coordination
    - Requirements for placing points of contact in response centers
- Reporting/follow-up info
  - Any changes we may need to the after event report
  - Any changes needed to end of season report



# COMMUNITY ENGAGEMENT

***Adding more detailed expectations to Phase I procedural requirement to include a community outreach and engagement strategy in Wildfire Protection Plans.***

## Specific issues

- Education and awareness strategy –Procedural requirement to include an education and awareness plan that is developed in coordination with public safety partners, informed by local needs and best practices. Plan must include:
  - Actions in preparation for season
  - Include PSPS education campaign
  - Actions during season
  - Actions after season
  - Specifics to ensure efficiency and efficacy e.g., multiple languages, multiple channels, use of description of metrics to ensure effectively reaching populations
- Wildfire Protection Plan engagement strategy – procedural requirement for describing the process that was used to engage community in development of risk mitigation plan (investment decisions/cost analysis framework, things that will be happening in community, where to find educational resources)
- Coordination requirements for utilities to work with local and state emergency planners and emergency responders for PSPS and in general for wildfire events



# VEGETATION MANAGEMENT

***Adding new vegetation management requirements to the Division 24 safety standards. Note: Phase I rules include procedural requirement to include vegetation management strategy in the Wildfire Protection Plans—no changes proposed additions or changes to that in Phase II.***

Specific issues:

- Requirement to conduct joint inspections with all attachers on a utility pole.
- Requirements for inspection frequency and methods for facilities in high fire consequence areas and all transmission facilities over 50 kV
- Additional considerations when establishing trim cycles (weather, wind, risk analysis, history, etc.)
- Reduction in time allowed to defer corrections of violations of Commission rules





# SYSTEM HARDENING

*Phase I rules require utilities to describe how they are addressing system hardening using best industry practices in Wildfire Protection Plans.*

Not proposing more than existing procedural requirement to describe utility strategy.

# COST ANALYSIS

*Phase I rules require utilities to consider costs and benefits of strategies in Wildfire Protection Plans and to discuss those considerations as part of their plans.*

Not proposing any changes to existing procedural requirement to include a cost-benefit analysis.



# Questions?

Staff Contact

Lori Koho – [lori.koho@puc.Oregon.gov](mailto:lori.koho@puc.Oregon.gov)



Submit Written Comments to [puc.filingcenter@puc.oregon.gov](mailto:puc.filingcenter@puc.oregon.gov)