



Oregon

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Public Utility Commission

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AR – 638

Staff's Proposed Revised Scope



Over the past month, Staff has been reviewing and critiquing the original scoping document in light of the number of projects assigned to the Commission during the 2021 Legislative session.

Like many of you, we have limited resources and our goal is to have effective rules that will maintain relevance for several years but with recognition that they will be updated as we learn more.

Staff's proposed scope and schedule for developing Phase 2 rules are attached.

We look forward to your input at the upcoming August 23, 2021 workshop or through written comments.

Workshop Agenda

Welcome	5 minutes
Rulemaking strategy overview and phasing discussion	10 minutes
Phase II schedule review	5 minutes
Phase II scope review	1.5 hours total
<i>Risk analysis</i>	<i>10 minutes</i>
<i>PSPS Protocols</i>	<i>30 minutes</i>
<i>Community Engagement</i>	<i>30 minutes</i>
<i>Vegetation Management and System Hardening</i>	<i>20 minutes</i>
Additional question, comments, scoping issues	10 minutes

If you have questions about the workshop or rulemaking, please contact:

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AR 638 – Phase II Permanent rulemaking scope
DRAFT

This document describes Staff’s revised scope for Phase II of the wildfire mitigation rulemaking. For ease of understanding major modifications, the revised scope is organized by the existing work group topic areas in the previous AR 638 scope.

AR 638/648 strategy proposal



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 planers 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.