

March 25, 2022
Filing Center
Oregon Public Utility Commission of Oregon
201 High Street SE, Suite 100
P.O. Box 1088
Salem, OR 97301

Via Electronic Filing

Re: STOP B2H Wildfire Mitigation Comments by Jim Kreider /s/ Jim Kreider
Docket AR 638 - Wildfire Mitigation Rulemaking – Remainder of Rules in Division 24

Attention: Filing Center

The STOP B2H Coalition appreciates the opportunity to submit these comments concerning the Public Utility Commission of Oregon's (OPUC) redlined rules developed by AHD for AR 638. We will comment on the AHD red line as well as some of the earlier filed comments by other stakeholders.

1. In the rule and comment below we are concerned that the IOU's limiting term "HFRZ Detailed Inspection" only allows them to look for "electrical ignition" problems. There could be fibrous, soil/erosion, animal/human construction, or other environmental issues that could present hazards. Therefore, we prefer the "Comprehensive Facility Inspection" wording as it is more complete.

AMEND: 860-024-0001

RULE TITLE: Definitions for Safety Standards

RULE TEXT:

AHD

(5) "~~Joint Inspection~~" "Comprehensive Facility Inspection" means an inspection of all equipment on any utility pole, structure, duct or conduit, owned by either the Owner or an Occupant(s).

IOU's

(5) "HFRZ Detailed Inspection" means an inspection that identifies potential sources of electrical ignition on any utility pole, structure, duct or conduit owned by either the Owner or an Occupant(s).

2. For the rule below we realize that there is an exemption for this process from the State Board of Forestry Oregon Explorer mapping requirements in SB 762. However, we would like to suggest that wording be included that does not preclude this mapping from being done at some future date. A suggestion would be to add something like, "This satisfactory form may evolve in the future to include formatting to be imported into the State Board of Forestry Oregon Explorer Wildfire mapping project to compare and contract identified risk areas", at the end of the last sentence in (2).

AMEND: 860-024-0005

RULE TITLE: Maps and Records

RULE TEXT

(1) Each utility shall keep on file current maps and records of the entire plant showing size, location, character, and date of installation of major plant items.

(2) Upon request, each utility shall file with the Commission an adequate description or maps to define the territory served. Maps must include all recently identified High Fire Risk Zones. All maps and records which the Commission may require the utility to file shall be in a form satisfactory to the Commission Staff. This satisfactory form may evolve in the future to include formatting to be imported into the State Board of Forestry Oregon Explorer Wildfire mapping project to compare and contract identified risk areas.

3. In the rule below on inspections we suggest in (2)(b) that the public also be notified of the of the designation of the annual geographic areas to be inspected when the operators are notified.

AMEND: 860-024-0011

RULE TITLE: Inspections of Electric Supply and Communication Facilities

RULE TEXT:

(2) Each Operator of electric supply facilities must:

(a) Designate an annual geographic area (including High Fire Risk Zones as identified by Operators of electric supply facilities) to be inspected pursuant to subsection (1)(b) of this rule within its service territory;

(b) Provide timely notice of the designation of the annual geographic area to all Owners and Occupants. The annual coverage areas for the entire program must be made available in advance and in sufficient detail to allow all Operators with facilities in that service territory to plan needed inspection and correction tasks. Unless the parties otherwise agree, Operators must be notified of any changes to the established annual geographic area designation no later than 12 months before the start of the next year's inspection. For High Fire Risk Zones, Operators must be notified of any changes to the designation of a High Fire Risk Zone no later than 60 days before the start of the year's inspection. **The public and county emergency managers or equivalent must also be notified, at the same times as the operators, of the annual and high risk fire zone inspections via their bills and press releases in their service territories.;**

4. In Minimum vegetation clearance the IOU's suggest re-inserting the word routine at (5). Is the commission designing for extraordinary or routine conditions? The language in the sentence seems inconsistent. It talks of reasonably anticipated operational conditions, then adverse weather and possibly routine wind conditions. In many cases it is high winds and dry conditions that trigger red flag warnings and fires.

We believe the wording here and throughout should be designed for adverse or extreme conditions not routine or reasonably anticipated. How were most of the California fires started?

In addition at (9) we believe there should be a courtesy notification to the local governmental until if this authority is exercised.

AMEND: 860-024-0016

RULE TITLE: Minimum Vegetation Clearance Requirements

RULE TEXT:

(5) Under reasonably anticipated operational conditions, as well as adverse weather and wind conditions, an Operator of electric supply facilities must maintain the following minimum clearances of vegetation from conductors:

(9) Electric utilities performing vegetation management work in High Fire Risk Zones in accordance with this Section are exempt from compliance with any applicable local law governing tree trimming and removal.

In conclusion we suggest having a public "tip" number for the public to call and report hazardous operational conditions.

/s/ Jim Kreider, STOP B2H Coalition