



Portland General Electric
121 SW Salmon Street • Portland, OR 97204
portlandgeneral.com

Christopher Clark
Siting Policy Analyst and Rules Coordinator
Oregon Department of Energy
550 Capitol St. NE, 1st floor
Salem, OR 97301

RE: Energy Facility Siting Council Wildfire Prevention and Response Rulemaking

Dear Mr. Clark,

Thank you for the opportunity to provide comments on the Energy Facility Siting Council's rulemaking on wildfire prevention and response. As the state's largest utility, PGE serves two million people in 51 cities and has operations in one out of every four counties in the state. Together with customers, communities, and partners, we are creating a safe, reliable, clean, and accessible energy future for all.

As climate change continues to threaten the landscape of our state, PGE has taken a proactive approach to reducing wildfire risk. This work began in 2018 and has evolved every year, incorporating learnings and the dynamic environment in which we operate. In December of 2021, we submitted our first Wildfire Mitigation Plan to the Oregon Public Utility Commission (OPUC) as required under SB 762, which passed in the 2021 legislative session. We have also actively been engaging in the OPUC's rulemaking around this effort, AR 638 and AR 648.

Wildfire Mitigation Plans submitted to the OPUC are required to identify wildfire risk mitigation and preventative actions within the service territory of the Public Utility and outside the service territory of the Public Utility within the right of way for generation and transmission assets. The intent of the Wildfire Mitigation Plans is to ensure oversight and approval of a Public Utility's plans for reducing wildfire risk within their respective areas of operation in the state. PGE sees this process as one that remains nimble enough to adapt to the evolving framework in which we operate while also allowing for stakeholder feedback and the incorporation of learnings from others.

We understand the Energy Facility Siting Council's interest in ensuring that wildfire mitigation is considered for facilities under the Council's jurisdiction as the frequency and intensity of wildfires increases. However, the requirement to submit wildfire mitigation plans for facilities already under the purview of the OPUC would create a duplicative process that while well intentioned, could inadvertently conflict with timelines and processes underway. As utilities invest in generation resources to meet the state's clean energy targets for 2030 while also maintaining flexibility and responsiveness to the impacts of climate change, ensuring a streamlined administrative process will be critical. PGE strongly encourages the Energy Facility Siting Council to exclude facilities that are already or will be included in a Public Utility's Wildfire Mitigation Plan from the rulemaking process.

Thank you again for the opportunity to provide comments. We look forward to continuing to work with the Council on current and future projects.

/s/ Bill Messner
Bill Messner
Director of Wildfire Mitigation and Resiliency