



Wildfire Prevention and Mitigation

Introduction

Wildfire prevention is an important issue for Oregon's electricity sector. Electric infrastructure can create sparks that have the potential to start wildfires, either through direct contact with dry vegetation or equipment failure.

The Oregon Public Utility Commission (PUC) regulates three investor-owned electric utilities: Portland General Electric, Pacific Power, and Idaho Power. The PUC also provides safety oversight for the 38 consumer-owned utilities (Cooperatives, Peoples' Utility Districts, and Municipal Utilities). The Oregon Department of Energy has an interactive [map](#) showing the service territories of these utilities.

Following the California wildfires in 2017 and 2018, the PUC urgently began engaging all utilities in Oregon and stakeholders to bring the emerging and evolving risk of wildfire caused by electrical infrastructure to the forefront.

The PUC first required the regulated utilities to present wildfire mitigation planning efforts beginning in 2019. Issues addressed in the plans included, among other things, enhanced vegetation management, system hardening investments, and developing criteria and protocols for proactively de-energizing lines (Public Safety Power Shut-Offs or PSPSs). A PSPS is an important safety measure designed to help protect people and communities in high fire-risk areas by proactively shutting off electricity during extreme and dangerous weather conditions. A PSPS is a measure of last resort because of the significant impacts the loss of power can have on communities and the extensive planning and communication that are needed to effectively implement them.

The PUC's work in this area received greater attention and urgency following the devastating 2020 Labor Day fires in Oregon, which highlighted the need for continued efforts for utilities to enhance wildfire mitigation strategies. At the same time, the PUC also needs to scrutinize the investor-owned utilities' wildfire mitigation investments and costs to ensure reasonable customer rates.

In this section we summarize the directives issued by both the Governor and Legislature, as well as PUC actions in response to addressing the rapidly changing wildfire risk and its impact on electric utilities, their customers, and the communities they serve.

Policy Direction

Executive Order 20-04

In setting out directives for agencies to integrate the state’s greenhouse gas (GHG) emissions reduction goals, section 4 of the Governor’s Executive Order 20-04 required the PUC to take the following actions related to wildfire risk:

- Evaluate investor-owned electric utilities’ risk-based wildfire protection plans and planned activities to protect public safety, reduce risks to utility customers, and promote energy system resilience in the face of increased wildfire frequency and severity, and in consideration of the recommendations made by the Governor’s Council on Wildfire Response 2019 Report and Recommendations.
- Convene periodic workshops for purposes of assisting investor-owned electric utilities, consumer-owned utilities, and operators of electrical distribution systems to develop and share best practices for mitigating wildfire risk.

Senate Bill 762 (2021)

SB 762 is a comprehensive, omnibus wildfire bill that establishes new electric utility system mandates to identify and assist in mitigating wildfire risks. Sections 1 – 6 impact electric systems and generally mirror provisions in Executive Order 20-04.

Section 2 requires the PUC to convene workshops for the purpose of helping all utilities in Oregon and operators of electrical transmission and distribution systems to develop and share information on identifying, adopting, and carrying out best practices regarding risk-based wildfire protection and mitigation practices, procedures, and standards.

Sections 3 – 5 focus on requiring both investor-owned utilities and consumer-owned utilities to operate under risk-based wildfire protection plans. The IOUs must submit plans annually to the PUC for review and approval. The COUs must submit copies to the PUC of their wildfire mitigation plans once they have been approved by their governing body.

PUC Action**Oregon Wildfire Electricity Collaboration (OWEC)**

During the summer of 2020, the PUC formed the Oregon Wildfire Electric Collaborative (OWEC) to help operators of electrical distribution systems identify and share best practices for mitigating wildfire risk. See [Oregon Wildfire Electric Collaborative](#). Meetings are held year-round, with the exception of fire season.

The PUC has held seven collaborative workshops to date to address the following issues: (1) Identifying and Monitoring Wildfire Risk from Seasonal to Long-term Time Frames; (2) Utility De-Energization and Public Safety Power Shutoffs; (3) Adapting Vegetation Management to Changing Ecosystems; and (4) Fire Season Forecast, Risk Modeling, and Situational Awareness Tools; (5) 2021 Wildfire Season Debrief; (6) Facility, Design, Operations, and Maintenance in a Changing Environment, and (7) Wildfire Risk Modeling and the United States Forest Service (USFS) Interagency Fuel Treatment Decision Support System (IFTDSS).

AR 638 Rulemaking

In response to SB 762 and EO 20-04, the PUC opened a rulemaking ([AR 638](#)) and adopted rules for investor-owned utilities on wildfire mitigation and prevention. The PUC adopted rules on PSPS in advance of the 2022 wildfire season in May 2022. See [PSPS Rules Press Release and Link to Order](#). The PUC completed its rulemaking on wildfire plans in August 2022.

The rules include not only requirements for the wildfire mitigation plans required to be filed by the investor-owned utilities, but also specific communication requirements for the utilities to inform public safety partners, state agencies, local jurisdictions, and the public of the need to implement a PSPS to mitigate wildfire risk, as well as updates at least every 24 hours until service is restored. The rules also include a new inspection framework to ensure that third-party facilities attached to electric utility poles, as well as electric facilities attached to third-party owned poles, are properly inspected-and any ignition hazards are repaired when they are located in high risk fire zones, but ensure cost recovery for efforts performed by electric utilities on behalf of joint users. See [AR 638 Order and Rules](#).

Wildfire Protection Plans

Under SB 762, the PUC is responsible for the review and approval of wildfire protection plans for Oregon’s three investor-owned utilities (PacifiCorp [UM 2207](#)), (PGE [UM 2208](#)), and (Idaho Power [UM 2209](#)).

Oregon’s 38 consumer-owned utilities (Cooperatives, Peoples’ Utility Districts, and Municipalities) are required to develop wildfire protection plans to be approved by their own governing authorities, with copies of the approved plans submitted to the PUC.

Copies of all the electric utility plans can be found here: [Wildfire Mitigation Plans for Oregon Utilities](#)

Utility Cost Recovery

The PUC engages in a variety of forums with investor-owned utilities and stakeholders to determine proper ratemaking under [ORS 757.210 to 757.220](#) to provide IOUs with an opportunity to recover reasonable operating costs and prudent investments made to develop, implement, or operate a wildfire protection plan.

The PUC addressed rate recovery for wildfire-related costs in recent general rate cases for both PacifiCorp ([Order No. 20-473](#)) and Portland General Electric ([Order No. 22-129](#)).

The PUC is also currently addressing costs related to wildfire protection in PacifiCorp’s pending rate case, [UE 399](#) and PGE’s request to establish a wildfire deferral mechanism in [UM 2019](#).

Wildfire Programs Advisory Council

The PUC serves as a resource to the Wildfire Programs Advisory Council and the State Wildfire Programs Director in the oversight of the implementation of SB 762, and assists efforts to further engage with all electric utilities regarding further actions to protect public safety, reduce risk to electric company customers and promote electrical system resilience to wildfire damage. See [Wildfire Programs Advisory Council](#).