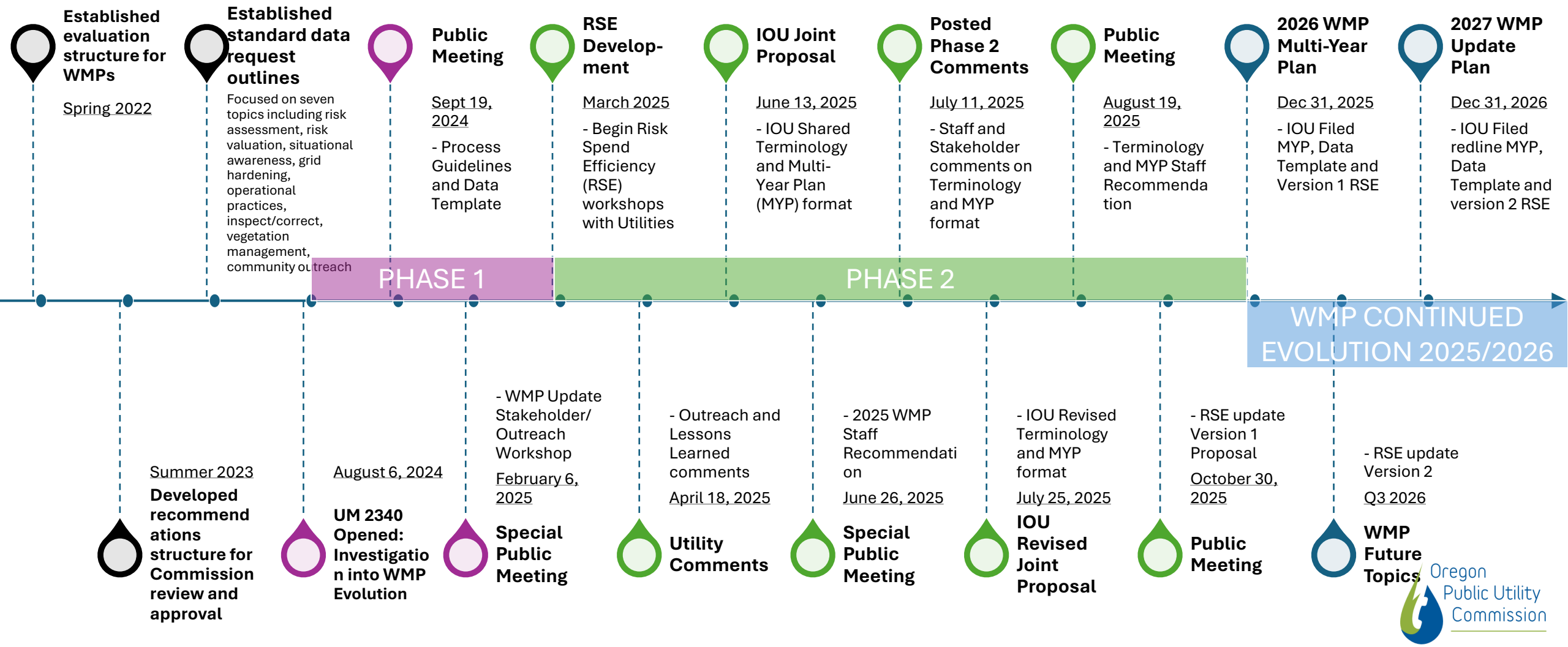
Wildfire Mitigation Plans and the Current State of Evolution

December 2025

Oregon Public Utility Commission

Wildfire Mitigation Plan Evolution



Oregon Public Utility Commission

WMP Evaluation Overview

How the OPUC evaluates IOU WMP Plans

1. **Outlines the OARs to categorize and evaluate WMP plans**
   - As a result of Oregon Legislative laws Oregon Secretary of State's Administrative Rules Unit approves and adopts Oregon Administrative Rules(OAR).
2. **Review of Data Template Completion and any other filing requirements**
3. **Reviews any Commission orders from previous filings**
   - Staff reviews the previous years orders for each IOU, to evaluate completion
4. **Data Requests**
   - Staff will also request additional data requests.
5. **Third party Independent Evaluator (IE)**
   - The IE also evaluates each IOUs WMP against the above (OARs, previous commission orders, International Wildfire Risk Mitigation Consortium (IWRMC) maturity model, and data template submittals)

Oregon Public Utility Commission

WMP Evaluation
1. Oregon Administrative Rules

Administrative Rule Compliance	
Code	**Requirement**
OAR 860-300-0020 (1)(a)(A)+(B)	Identified areas that are subject to a heightened risk of wildfire, including determinations for such conclusions, and are: (A) Within the service territory of the Public Utility, and; (B) Outside the service territory of the Public Utility but within the Public Utility's right-of-way for generation and transmission assets
OAR 860-300-0020 (1)(b)	Identified means of mitigating wildfire risk that reflects a reasonable balancing of mitigation costs with the resulting reduction of wildfire risk
OAR 860-300-0020 (1)(c)	Identified preventative actions and programs that the utility will carry out to minimize the risk of the utility's facilities causing wildfire
OAR 860-300-0020 (1)(d)	Discussion of the outreach efforts to regional, state, and local entities, including municipalities, regarding a protocol for the de-energization of power lines and adjusting power system operations to mitigate wildfires, promote the safety of the public and first responders, and preserve health and communication infrastructure
OAR 860-300-0020 (1)(e)	Identified protocol for the de-energization of power lines and adjusting of power system operation to mitigate wildfires, promote the safety of the public and first responders, and preserve health and communication infrastructure, including a PSPS communication strategy consistent with OAR 860-300-040 through 860-300-050
OAR 860-300-0020 (1)(f)	Identification of the community outreach and public awareness efforts that the utility will use before, during, and after a wildfire season, consistent with OAR 860-300-040 through 860-300-050
OAR 860-300-0020 (1)(g)	Description of the procedures, standards, and timeframes that utilities will use to inspect utility infrastructure in areas it has identified as heightened risk of wildfire, consistent with OAR 860-024-0018
OAR 860-300-0020 (1)(h)	Description of the procedures, standards, and timeframes that the utility will use to carry out vegetation management in areas it has identified as heightened risk of wildfire, consistent with OAR 860-024-018
OAR 860-300-0020 (1)(i)	Identification of the development, implementation, and administrative costs for the Plan, which includes discussion of risk-based cost and benefit analysis, and considerations of technologies that offer co-benefits to the utility's system
OAR 860-300-0020 (1)(j)	Description of participation in national and international forums, including workshops identified in section 2, chapter 592, Oregon Law 2021, as well as research and analysis the utility has undertaken to maintain expertise in leading-edge technologies and operational practices, and how such technologies and operational practices have been used to develop and implement cost effective wildfire mitigation solutions
OAR 860-300-0020 (1)(k)	Description of ignition inspection programs, as described in Division 24 of these rules, including how the utility will determine and instruct its inspectors to determine conditions that could pose an ignition risk on its own equipment and pole attachments

Oregon PUC Lessons Learned

Issues:

1. No outlined structure requirements made it difficult for Staff and Stakeholders to evaluate reports and locate appropriate sections to clearly track code compliance.
2. Staff created substantial data requests to establish the type of detailed information needed to effectively evaluate the WMPs.
3. Limited supporting data and methodologies to evaluate system effectiveness, optimal mitigation efforts, cost benefit constructs.
4. Limited OPUC Staff to perform new analysis.
5. Mandated challenging turn-around requirements.

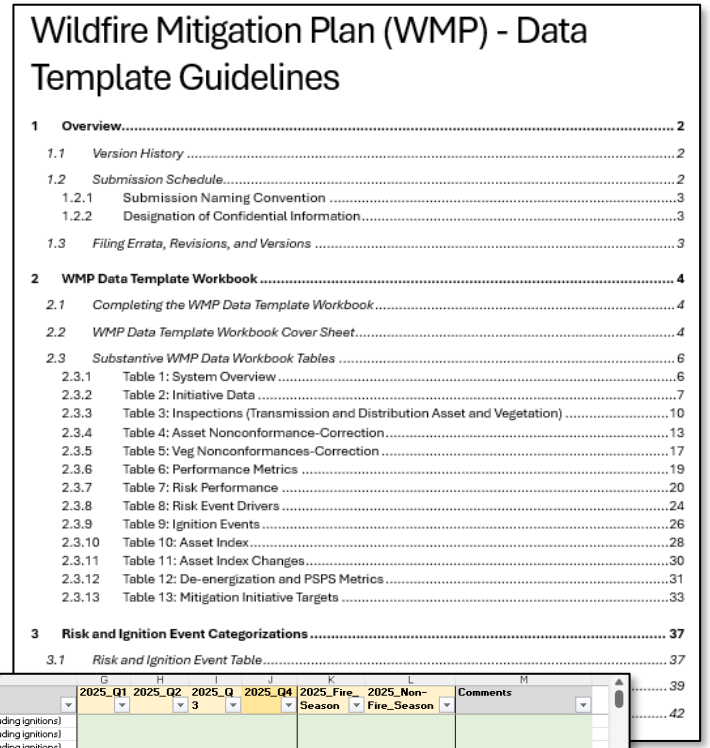
Oregon Public Utility Commission

WMP Evolution
2. Data Template & other new filing requirements

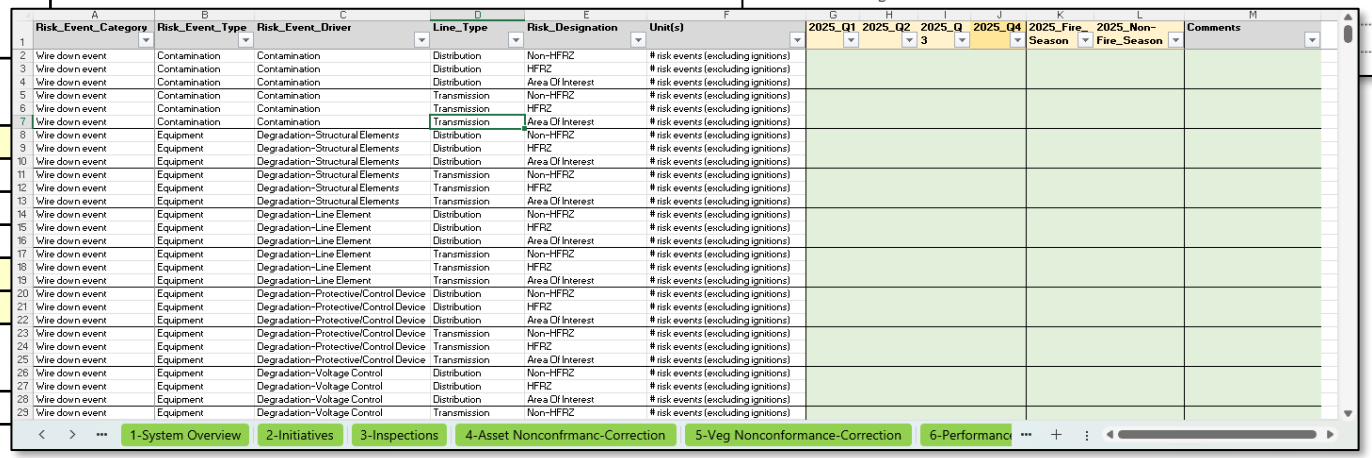
OPUC Staff reviews the completion of the data templates.

- Given legislative rules require the submission of WMPs at the end of the reporting year, Staff requires that IOUs submit 2 Data Templates.
  - The initial Data Template filing is filed at the end of the reporting period with the WMP first submission contains data Q1-Q3
  - The Final Data Template is filed on March 31 and includes data for the full reporting year.

Worksheet	December 31 Q1-Q3	March 31 Q4 and Updates
Cover Sheet	All fields	All fields
Table 1-System Overview	All fields	Only if corrections
Table 2-Initiatives	All fields	All fields
Table 3-Inspections	'Year' Q1-3	'Year' Q4 & Q1-3 corrections
Table 4- Asset Nonconformances-Correction	'Year' Q1-3	'Year' Q4 & Q1-3 corrections
Table 5-Veg Nonconformances-Correction	'Year' Q1-3	'Year' Q4 & Q1-3 corrections
Table 6-Performance Metrics	All fields	Only if corrections
Table 7-Risk Performance	'Year' Q1-3	'Year' Q4 & Q1-3 corrections
Table 8-Risk Events	'Year' Q1-3	'Year' Q4 & Q1-3 corrections
Table 9-Ignition Events	'Year' Q1-3	'Year' Q4 & Q1-3 corrections
Table 10-Asset Index	All fields	Only if corrections
Table 11-Asset Index Changes	All fields	Only if corrections
Table 12-De-engz & PSPS Metrics	'Year' Q1-3	'Year' Q4 & Q1-3 corrections
Table 13-Mit Initiative Targets	All fields	All fields



Wildfire Mitigation Plan (WMP) - Data Template Guidelines



	A	B	C	D	E	F	G	H	I	J	K	L	M
1	Risk_Event_Category	Risk_Event_Type	Risk_Event_Driver	Line_Type	Risk_Designation	Unit(s)	2025_Q1	2025_Q2	2025_Q3	2025_Q4	2025_Fire_Season	2025_Non-Fire_Season	Comments
2	Wire down event	Contamination	Contamination	Distribution	Non-HFRZ	# risk events (excluding ignitions)							
3	Wire down event	Contamination	Contamination	Distribution	HFRZ	# risk events (excluding ignitions)							
4	Wire down event	Contamination	Contamination	Distribution	Area Of Interest	# risk events (excluding ignitions)							
5	Wire down event	Contamination	Contamination	Transmission	Non-HFRZ	# risk events (excluding ignitions)							
6	Wire down event	Contamination	Contamination	Transmission	HFRZ	# risk events (excluding ignitions)							
7	Wire down event	Contamination	Contamination	Transmission	Area Of Interest	# risk events (excluding ignitions)							
8	Wire down event	Equipment	Degradation--Structural Elements	Distribution	Non-HFRZ	# risk events (excluding ignitions)							
9	Wire down event	Equipment	Degradation--Structural Elements	Distribution	HFRZ	# risk events (excluding ignitions)							
10	Wire down event	Equipment	Degradation--Structural Elements	Distribution	Area Of Interest	# risk events (excluding ignitions)							
11	Wire down event	Equipment	Degradation--Structural Elements	Transmission	Non-HFRZ	# risk events (excluding ignitions)							
12	Wire down event	Equipment	Degradation--Structural Elements	Transmission	HFRZ	# risk events (excluding ignitions)							
13	Wire down event	Equipment	Degradation--Structural Elements	Transmission	Area Of Interest	# risk events (excluding ignitions)							
14	Wire down event	Equipment	Degradation--Line Element	Distribution	Non-HFRZ	# risk events (excluding ignitions)							
15	Wire down event	Equipment	Degradation--Line Element	Distribution	HFRZ	# risk events (excluding ignitions)							
16	Wire down event	Equipment	Degradation--Line Element	Distribution	Area Of Interest	# risk events (excluding ignitions)							
17	Wire down event	Equipment	Degradation--Line Element	Transmission	Non-HFRZ	# risk events (excluding ignitions)							
18	Wire down event	Equipment	Degradation--Line Element	Transmission	HFRZ	# risk events (excluding ignitions)							
19	Wire down event	Equipment	Degradation--Line Element	Transmission	Area Of Interest	# risk events (excluding ignitions)							
20	Wire down event	Equipment	Degradation--Protective/Control Device	Distribution	Non-HFRZ	# risk events (excluding ignitions)							
21	Wire down event	Equipment	Degradation--Protective/Control Device	Distribution	HFRZ	# risk events (excluding ignitions)							
22	Wire down event	Equipment	Degradation--Protective/Control Device	Distribution	Area Of Interest	# risk events (excluding ignitions)							
23	Wire down event	Equipment	Degradation--Protective/Control Device	Transmission	Non-HFRZ	# risk events (excluding ignitions)							
24	Wire down event	Equipment	Degradation--Protective/Control Device	Transmission	HFRZ	# risk events (excluding ignitions)							
25	Wire down event	Equipment	Degradation--Protective/Control Device	Transmission	Area Of Interest	# risk events (excluding ignitions)							
26	Wire down event	Equipment	Degradation--Voltage Control	Distribution	Non-HFRZ	# risk events (excluding ignitions)							
27	Wire down event	Equipment	Degradation--Voltage Control	Distribution	HFRZ	# risk events (excluding ignitions)							
28	Wire down event	Equipment	Degradation--Voltage Control	Distribution	Area Of Interest	# risk events (excluding ignitions)							
29	Wire down event	Equipment	Degradation--Voltage Control	Transmission	Non-HFRZ	# risk events (excluding ignitions)							

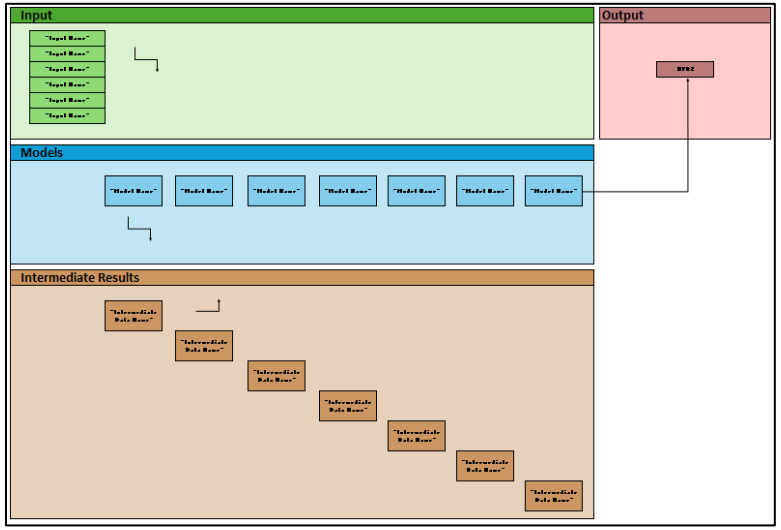
1-System Overview | 2-Initiatives | 3-Inspections | 4-Asset Nonconfrmanc-Correction | 5-Veg Nonconformance-Correction | 6-Performanc

WMP Evolution
3. Risk Spend Efficiency

With the recent approval in UM2340 (Order 25-436) IOUs will supply information supporting the advancement of risk spend efficiency.

- Included within this structure is:
  - Identification of risk (data that is considered, timing of its update, etc.)
  - Outlining assets by type OH, UG, and system level outage rate (during wildfire period)
  - Mitigation effectiveness by mitigation type
  - Mitigation cost
  - Calculated before and after ignition risk divided by annual cost of the mitigation

Section	Summary	Status
Section 1: HFRZ Exposure Risk Modeling	Outlines the utilities environmental HFRZ exposure risk and applies the data to circuit segments	Developed
Section 2: Outage/Fault Ignition Risk	Tabulates historical outage/fault history for each circuit segment by risk driver. Determines the conditional probability of an ignition given an outage has occurred. Outlines mitigation effectiveness based on Ignition Risk Grouping categories. Applies these results to historical outage events by circuit segment to determine ignition risk prior to and post mitigation	Developed
Section 3: Asset Health Risk	Reviews the type and age of equipment to measure ignition risk prior to and post mitigation for the circuit segment.	To be developed
Section 4: Qualitative Risk Analysis	Additional utility assessment of risk based on utility defined and measured qualitative analysis of the circuit segment. Allows the utility to note completed mitigation work for a circuit segment with little to no post mitigation outage data.	To be developed
Risk Summary: Base Risk Summary	Summarizes the base risk from section 1-4 highlighting areas with the high risk.	Developed
Section 5: Mitigation Cost	Uses average cost per mitigation type to determine the lifetime cost of the mitigation and annual cost of the mitigation over its lifetime.	Developed
Section 6: Risk Spend Efficiency	Calculates risk prior to and post mitigation and the annual cost of the mitigation to develop RSE values for each mitigation type by circuit segment.	Developed
Section 7: Co-Benefits	Measures key co-benefits of wildfire mitigation measures such as reliability impacts.	To be developed



Wildfire Mitigation Plan (WMP) – Risk Spend Efficiency (RSE) Workbook Guidelines

Senate Bill 83 (2025)

Expectations from policy-makers about wildfire mitigation plans, increased reporting requirements from PUC during the year

1. Status report on wildfire protection plans statewide
2. OWEC summary update
3. PSPSs initiated
4. Moneys expended and budgeted by IOUs
5. Legislative action requested

Oregon Public Utility Commission

Thank You