

# Wildfire Programs Advisory Council Report

## Work Group #3 – Advancing Fire Protection

---

This contains draft report sections focused on 1) utilities (Bill sections 2-6) and 2) public health (Bill sections 13-15). Please see the full workgroup schedule for timeline of other sections to come.

### SECTIONS 2-6: UTILITIES

#### 1. Summary of relevant SB 762 section

The Public Utilities Commission (PUC) is required to periodically convene workshops for electric utilities and system operators to share information related to wildfire best practices, to adopt risk reduction standards by rule, and to evaluate and approve Public Utility plans that meet specified requirements within 180 days.

Public Utilities (PacifiCorp, Portland General Electric, and Idaho Power) are required to create, and operate in compliance with, a PUC-approved wildfire protection plan; with the first plan submitted by December 31, 2021, with regular updates thereafter. The wildfire protection plans must, at a minimum contain:

- Identified heightened wildfire risk areas within the service territory
- Mitigation strategies that reflect a reasonable balance with costs
- Protocol for de-energization of power system as a mitigation strategy
- Inspection procedures in the identified high fire risk areas
- Vegetation management procedures in the identified high fire risk areas
- Costs for the development, implementation, and administration of the plan
- Community outreach and public awareness efforts

Consumer-owned utilities (cooperative Electric Utilities, Peoples Utility districts, and Municipal electric Utilities) are required to create, and operate in compliance with, a governing body-approved wildfire mitigation plan with the first plan submitted by June 30, 2022, with regular updates thereafter. A copy of the risk-based wildfire mitigation plan is required to be submitted to the Public Utility Commission to facilitate commission functions regarding statewide wildfire mitigation planning and wildfire preparedness. The wildfire protection plans must contain the following:

- Mitigation strategies that protect public safety, reduce risk to utility customers and promote electrical system resilience to wildfire damage
- A wildfire risk assessment of utility facilities

#### 2. Status of implementation of that section

To fulfill the requirement of periodically convening workshops for electric utilities and system operators to share information related to wildfire best practices, the PUC facilitates the Oregon Wildfire & Electric Collaborative (OWEC). Since July 2020 seven of these OWEC workshops have been held to discuss a range of topics where stakeholders are encouraged

# Wildfire Programs Advisory Council Report

## Work Group #3 – Advancing Fire Protection

---

to participate to enhance collaboration in Oregon regarding wildfire-related operational and policy issues.

The PUC has also developed administrative rules (AR638) that detail specific requirements for Public Utilities to include in submitted wildfire protection plans. The administrative rules are in alignment with Senate Bill 762 and provide risk reduction standards that the public utilities can be measured against.

The Public Utilities (PacifiCorp, Portland General Electric, and Idaho Power) all submitted wildfire protection plans by December 31, 2021. Through a public process the PUC evaluated the public utilities plans and provided approval or approval with conditions within the required 180-day timeframe.

As of August 2022, X of Y consumer-owned utilities have submitted wildfire protection plans to the PUC as approved by their governing body.

### 3. Commentary, observations, recommendations if any

While the Public Utility Commission has the authority to develop administrative rules that describe the detailed wildfire protection plan requirements for Public Utilities (in alignment with SB762), it does not have the same authority over the Consumer-owned utilities. Each consumer-owned utility's governing body has their own authority to require and approve wildfire protection plan detailed strategies and procedures. However, both public utilities and consumer-owned utilities are held to the common requirements stipulated in SB762. For example, procedures for de-energization are only explicitly required for public utilities and is not required for consumer-owned utilities. Therefore, it is recommended that a common minimum utility wildfire protection plan contents be included in the future. (36.2.b)

It should also be noted while developing a common plan content for utilities that the resources available to the public utilities and consumer-owned utilities varies dramatically based on the size of the utility. As such, certain requirements of a wildfire protection plan (such as data analytics or risk modeling) can be overly burdensome for some utilities. Therefore, it is recommended that an evaluation be conducted on how state resources for identified common wildfire mitigation strategies be made available to utilities. (36.2.c)

An example of a common wildfire mitigation strategy utilizing state resources is the development of a state wildfire risk map. Both the public utilities and consumer-owned utilities are required to identify heightened wildfire risk areas in their service territories. However, there is currently no specific requirement to relate this analysis to the state conducted risk map. Therefore, it is recommended that a common requirement for utilities be to incorporate the state risk map into the developed wildfire protection plan mitigation strategies. It is anticipated that by doing incorporating the risk map into the utility plans it will reduce confusion on how the state risk map relates to utility risk and the corresponding mitigation strategies. (36.2.e)

# Wildfire Programs Advisory Council Report

## Work Group #3 – Advancing Fire Protection

---

Several areas were noted for opportunities for increased collaboration between stakeholders; whether governmental bodies, utilities, other utility service providers (telecommunications) or general public. It is recommended that these opportunities could be addressed through the common plan content recommendation described above. The following are the identified increased collaboration opportunities: (36.2.d)

- Collaboration between local communities, public safety partners, and utilities for the identification of critical infrastructure that should be addressed as part of a de-energization procedure (i.e., irrigation used as firefighting, telecommunication services)
- Data sharing between stakeholders for situational awareness (i.e., weather station networks, wildfire detection camera networks, smoke detection / air quality networks)
- Coordinated community outreach and education to the general public on the various aspects of wildfire risk and mitigation strategies. Specifically de-energization procedures, impacts, and what support services are available to the public.
- Utility support by providing wildfire liaisons to local incident command during events to facilitate a coordinated response.

### Summary of Recommendations:

- ✓ A common minimum utility wildfire protection plan content
- ✓ State resources made available to smaller utilities for wildfire mitigation analysis
- ✓ Utilities to incorporate the state risk map into wildfire protection plans
- ✓ Collaboration between stakeholders for the identification of critical infrastructure
- ✓ Data sharing between stakeholders for situational awareness
- ✓ Coordinated community outreach and education to the general public
- ✓ Utility support to local incident command during wildfire events

### SECTIONS 13-15: PUBLIC HEALTH

#### 1. Summary of relevant SB 762 section

Health Systems for Smoke is laid out in Sections 13-15 of SB 762. Section 13 requires DEQ to develop a program regarding smoke impacts on communities across Oregon. Section 14 requires DHS to deploy smoke filtration systems to public buildings, including tribal-specific buildings and public schools, to become clean air centers. Section 15 involves OHA in deploying smoke filtration devices to residents who are most vulnerable to wildfire smoke and qualify for OHP or Medicaid.

#### 2. Status of implementation of that section

# Wildfire Programs Advisory Council Report

## Work Group #3 – Advancing Fire Protection

---

- DEQ:
  - Hired staff to provide technical and grant support
  - Completed monitoring needs analysis, identified new monitoring locations, and working to obtain stakeholder input
  - In the long-term need additional Community Response Planning for remaining Smoke Sensitive Receptor Areas, including crucial plan implementation support, as well as, cross agency strategy to track permits and share important fire and smoke information in a single location
- DHS:
  - Applications are live for local governments, public education providers, and tribal nations to apply to receive grants to become a clean air, warming, or cooling center - As of 6/16/2022, they have received about 80 applications
  - They are distributing 463 air scrubbers starting around 6/24/2022 to Salem, Medford, Bend, and Umatilla and are using an Equity Rubric to determine prioritization
  - Working on an MOU
- OHA:
  - Purchased about 10,000 air filtration devices and will deploy 5,000 before 7/1/2022.
  - Goal is to deploy these residential smoke filtration devices to eligible OHP members through CCOs in these targeted counties for now: Deschutes, Douglas, Josephine, Jackson, Klamath
  - Currently working on Targeting and Outreach

### 3. Commentary, observations, recommendations if any

#### (Section 13) DEQ:

- *Collaboration*
  - Mention of 20 local and tribal governments ‘consulted’
  - 3 recipients for alternatives to pile burning
  - Partners: ODF (smoke management plan)
- *Vulnerable communities*
  - Having trouble creating community response plans and developing long-term strategies for sharing smoke information
- *Recommendations*
  - Funding for long-term positions, especially in monitoring
  - Explore smoke management tools to assist in smoke mitigation, resilience, and fire response, such as prescribed burning, incorporating indigenous forest knowledge, and consulting with groups working in land restoration (*Look to Section 18 of SB 762*)

# Wildfire Programs Advisory Council Report

## Work Group #3 – Advancing Fire Protection

---

### (Section 14) DHS:

- *Collaboration*
  - Legislation: Worked to pass SB 1536 to add definitions and add \$2 million for cooling and warming shelters
  - Partners: 2-1-1, OHA, Eligible entities
- *Vulnerable communities*
  - Equity Rubric tool to determine prioritization
- *Recommendations*
  - Be clear on what the future is for this program, what makes it successful?
    - Formalize commitment for funding resources to better stabilize the future of this program
      - May need to be balanced with community resources to have long-term maintenance, this means stronger community support or funding from the state
  - Community outreach plan should be revisited and diversified to better reach the public and eligible entities to increase applications

### (Section 15) OHA:

- *Collaboration*
  - Legislation: Looking to integrate their smoke filtration program with the Healthy Homes program in 2023
  - Partners: CCOs, Vendors, DEQ, DHS
- *Vulnerable communities*
  - Prioritizing and identifying OHP, Medicaid, and medically vulnerable groups
- *Recommendations*
  - OHA expressed challenges with creating a distribution system
  - Although OHA has distributed about 10,000 air filtration devices, these are insufficient to fill the need
  - Explore the possibility of attachments of smoke filtration in ductless heat pumps, programs run by agencies like ETO and ODOE
  - Encourage possibility to add smoke filtration systems to medical equipment deployed by CCOs
    - OHA is not requesting extension of program in Agency Request Budget (ARB). CCOs have durable medical equipment program, OHA to work with them to add residential smoke filters to existing program.
  - Need to identify the full scope of what success looks like for this program

### Across the board:

- Have someone monitoring for duplication efforts/systems that can be avoided throughout SB 762 implementation

## Wildfire Programs Advisory Council Report

### Work Group #3 – Advancing Fire Protection

---

- For long-term collaboration, how can we identify those intersections and overlaps?
- All agencies expressed a labor or contractor shortage
- There is a supply shortage or slow turnaround to receive equipment
- The council is thinking about way to better identify people or entities that are in need of smoke filtration systems:
  - This can look like a self-assessment form to identify in-need households, business, or public buildings.
- Long-term funding and planning established for these programs

#### Follow-up Questions:

- DHS:
- DEQ:
  - Biofuel - is this technology carbon neutral?
  - How is tribal consultation happening for this program?
- OHA:
  - What is the total of devices needed to meet the need?