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RE: Docket U-210254—PacifiCorp's Responses

On October 5, 2022, the Washington Utilities and Transportation Commission (Commission) issued a Notice of Recessed Open Meeting to hear from utilities about the effectiveness of the utilities' fire mitigation and communication plans during the 2022 wildfire season. In the notice, the Commission requested that utilities respond to the following requests for information and questions. Unfortunately, PacifiCorp dba Pacific Power & Light Company (PacifiCorp or Company) was not served the aforementioned notice, and was notified by Commission staff on the request by Staff at a later date.

PacifiCorp responds to the Commission's questions below.

PacifiCorp's Responses:

1. *Experience with the 2022 wildfire season, including data and statistics related to:*
 - *The number of fires that occurred in the utility's service territory in the 2022 season.*
 - *The intensity of fires in the 2022 season.*
 - *Whether the utilities' operations were impacted by fires, and, if so, how and where.*
 - *Whether wildfires developed in areas defined as greater risk or in other areas designated as lesser risk.*
 - *Whether thresholds for use of the current set of fire mitigation tools (such as PSPS and dry land mode) are effective, if they have been working as intended, and if any new tools have been added or are needed.*
 - *Whether communication plans worked as intended and any gaps identified.*

The table below summarizes the number of fires that occurred in PacifiCorp's WA service territory during the 2022 season. For each of the 5 fires noted below, no infrastructure was damaged.

Fire Name	Acreage	Date of Origin	Service Area	County	Distance from Fire	Infrastructure Damage	De-Energized
TouchetNorth	2,153	6/28/2022	Walla Walla	Walla Walla	1.9 miles	No	No
Van Ausdle	843	7/29/2022	Walla Walla	Walla Walla	0.9 mile	No	No
Cow Canyon	5,832	8/3/2022	Yakima	Yakima	0 mile	No	No
Canyon Road	1,033	8/10/2022	Yakima	Yakima	0 mile	No	No
Medicine Valley	300	8/26/2022	Yakima	Yakima	0.1 mile	No	No

These fires did not develop in what PacifiCorp refers to as the Fire High Consequence Area (FHCA). As these fires did not impact PacifiCorp’s facilities during the 2022 fire season, the communication plans with fire response agencies may not have been fully tested. However, communication plans worked to the extent that PacifiCorp was aware of the events, monitored the fires, and was coordinating with emergency services.

Regarding PSPS activation, PacifiCorp’s dynamic risk assessment methodology did not identify the need for a PSPS during the 2022 fire season. Therefore, PSPS communication protocols were only tested through tabletop exercises in 2022.

2. What strategies did the utility use or explore for this wildfire season to enhance situational awareness for its customers?

- **What partnerships has the utility cultivated with first responders, land managers, and emergency operations personnel in preparing for the 2022 wildfire season?**
- **What communication channels and procedures are in place to coordinate planning and response efforts with these entities?**
- **How were those partnerships leveraged in the utility’s wildfire response?**
- **What plans did the utility have in place to communicate with customers, including Highly Impacted Communities, Vulnerable Populations, medically vulnerable customers, and Access and Functional Needs customers, about wildfire risk for this season overall, as well as specific wildfire risks or events?**
 - **How effective was customer communication regarding wildfire events? Were there any lessons learned?**
 - **If communications were not distributed to all customers, please explain who was excluded and why.**
- **What information did the utility provide to customers about the wildfire risk mitigation work it is performing?**
- **Were there any additional changes to utility communication plans since those plans were filed in April 2022?**

PacifiCorp participates in public safety partner meetings and utility workshop sessions during the calendar year; meetings are attended throughout the service territory and include monthly, quarterly, and annual emergency management partner and pre- and post-fire season collaboration meetings with local, state, and federal fire officials. PacifiCorp’s 2022 emergency training plan included one PSPS planning exercise held in Yakima County on May 12, 2022. The planning session included representatives from PacifiCorp as well as the department of human services,

Washington state patrol, Fire Districts, county emergency management and health district. Communication plans, channels, and protocols are included in this planning session.

To prepare and inform customers, PacifiCorp performed wildfire safety and preparedness paid advertising in its Washington service area prior to and during the 2022 wildfire season. Paid advertising included .15-.30 second informational videos served through social media, digital and OTT platforms; and static digital display and social media ads prompting users to visit the company wildfire safety webpage. The company also engaged with local and regional news outlets on wildfire safety and mitigation investments. Wildfire safety bill messages ran throughout the duration of the season. Spanish versions of the advertising (video and static ads) were in market as well.

3. *What strategies did the utility use or explore for this wildfire season to enhance situational awareness for utility operations?*

- ***What tools does the utility have available to respond to wildfire threats?***
- ***What changes, if any, have been made to operational tools in the utility's toolkit for responding to wildfire events or potential triggers of wildfire events since April?***
- ***Are thresholds/triggering events for the current set of tools effective? Have the tools been working as intended?***
- ***Does the utility offer programs for customers to request vegetation management work if they identify trees or vegetation that is in contact with power lines? How successful are these programs?***
- ***Were there additional changes to utility wildfire operations plans in April 2022?***

PacifiCorp leverages situational awareness dynamic risk modelling to daily identify and assess potential risks throughout the company's service territory including a five-day outlook. This assessment informs operational strategies such as the proactive deployment of field personnel to perform additional patrols or be ready to respond in an emergency. These assessments also inform the use of Elevated Fire Risk (EFR) protection and control settings on overhead lines to react more sensitively to potential fault events as well as the implementation of PSPS.

While still in progress, PacifiCorp has been working to ensure risk assessments don't just forecast the weather but also determine how the weather compares to standard conditions and whether that weather will intersect with outage risk. This assessment is used to facilitate a conversation around deployment of EFR settings or PSPS. While the philosophy of risk has not changed, as this analysis matures, the "thresholds" may look different as threshold will be expressed in terms of the percentile to determine relative, local risk instead of an absolute value applied universally.

PacifiCorp does not offer specific programs for customers to request vegetation management work if they identify trees or vegetation that is in contact with power lines. Instead, PacifiCorp has a process in place whereby if a customer identifies a need for vegetation management work, the customer can call Pacific Power's customer service desk to describe the condition. Customer service then creates an internal ticket that is routed to the district/forester over the area. The forester then may respond or assign it to a contractor to investigate. Either way, an inspection is

conducted to assess the identified condition and determine if corrective action is needed. PacifiCorp determines if work is needed (conditions may not valid) and if work is needed whether it can be deferred to the next scheduled routine maintenance or if it requires corrective actions prior to next scheduled maintenance.

PacifiCorp did not make any significant changes to its wildfire operations plan in April 2022. In general, the elements of PacifiCorp's plans have remained the same for many years. Each year, these elements mature and PacifiCorp makes incremental progress on its plans, but the plans themselves do not significantly change.

4. Were there additional lessons learned from the 2022 wildfire season?

In 2022, PacifiCorp continued seeing the benefits of enhanced situational awareness and learned that additional forecasting capabilities with more granular data is critical to informing real time decision making. This decision making informs the use of Elevated Fire Risk (EFR) protection and control settings on distribution lines as well as the implementation of a PSPS.

PacifiCorp is also learning how to collaborate and coordinate with permitting agencies such as forest agencies to ensure construction projects are moved forward expeditiously in a manner that works for both the utility and the forest agencies.

5. Are there any other anticipated changes for the 2023 wildfire season not mentioned above?

Additional work in 2022 will result in changes for the 2023 wildfire season. PacifiCorp is continuing to invest in tools, software, and data to enhance situational awareness and dynamic risk modeling. These tools and software that were being implemented in 2022 will be fully operational for the 2023 fire season and will look to continuously improve and enhance these tools as needed.

Additionally, much of the company's grid hardening projects will be moving into construction in 2023, pending permits and access constraints in the national forest.

