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Kathy Hunter  
Acting Executive Director and Secretary  
Washington Utilities and Transportation Commission  
621 Woodland Square Loop SE  
Lacey, WA 98503

**Re: In the Matter of Utility Wildfire Preparedness, Docket U-210254 – Responses of Puget Sound Energy**

Dear Director Hunter:

On October 17, 2023, the Washington Utilities and Transportation Commission (Commission) issued a Notice of Recessed Open Meeting in the above-captioned docket on the matter of utility wildfire preparedness (Notice). In the Notice, the Commission requested that utilities file their 2023 wildfire mitigation plans with the Commission<sup>1</sup> and respond to the questions in the Notice.

Puget Sound Energy (PSE) previously filed its 2023 Wildfire Mitigation and Response Plan (2023 Wildfire Plan) to this docket on July 13, 2023. For ease of reference, PSE hereby resubmits its previously filed 2023 Wildfire Plan as Attachment A to this filing. As requested in the Notice, PSE also provides responses below to the questions regarding PSE's 2023 Wildfire Plan and experiences during this year's wildfire season. PSE appreciates the opportunity to provide these responses and looks forward to participating at the Commission's November 21, 2023 Recessed Open Meeting.

**Introduction**

The 2023 Wildfire Plan documents PSE's strategies, programs, procedures, and specific actions to respond to and mitigate wildland fires. In the 2023 Wildfire Plan, PSE incorporates best practice models from risk management, operations, emergency management, communications, and training. PSE's priority is the safety of communities, customers, and personnel.

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<sup>1</sup> In the Notice, the Commission also requested that utilities file their plans with the Utility Wildland Fire Prevention Advisory Committee (UWFPAC). PSE submitted a copy of the 2023 Wildfire Plan to Loren Torgerson with the UWFPAC on November 13, 2023.

The 2023 Wildfire Plan includes updates based on learnings from previous years and ongoing discussions with peer utilities and PSE’s customers and public sector partners. PSE has improved its wildfire program governance, incorporated equity into its planning and execution, and matured its outage and risk modeling.

Throughout 2023, PSE advanced its planning efforts to develop public safety power shutoff (PSPS) capabilities and to strengthen relationships with partner agencies and customers in high wildfire risk communities. PSE continues to engage a broad range of interested parties as it evaluates risks and adaptively manages plan implementation. PSE looks forward to continuing these discussions in 2024 with the Commission and with PSE’s customers and partners.

### **Responses**

#### **1. Experience with the 2023 wildfire season, including data and statistics related to:**

##### **a. The number of fires that occurred in the utility’s service territory in the 2023 season.**

Based on data available from the Wildland Fire Interagency Geospatial Services Group, 35 fires of various sizes occurred within PSE’s service territory during the 2023 wildfire season. Of those 35 fires, four were “Large Fires” as defined by the Northwest Interagency Coordination Center (NWCC). The NWCC considers Large Fires to be 100 acres or more in timber, 300 acres or more in grasslands, or when a Type 1 or Type 2 Incident Management Team is assigned. For reference, the NWCC reported 41 Large Fires in Washington in 2023.

##### **b. The intensity of fires in the 2023 season in terms of acres burned and estimated damage to buildings and infrastructure.**

Table 1 below provides data summarizing the four Large Fires that occurred within PSE’s service territory in 2023. These fires did not result in damage to PSE buildings or infrastructure. The Sourdough Fire was the most “intense” of these fires due to its duration (a total of 63 days) and the number of acres burned.

*Table 1. “Large Fires” in PSE’s Service Territory During the 2023 Wildfire Season*

<b>Incident Name</b>	<b>Location</b>	<b>Fire Discovery Date</b>	<b>Size (acres)</b>	<b>PSE Assets Impacted?</b>	<b>Status</b>
Sourdough	North of Diablo and Gorge Lakes in North Cascades National Park	July 29, 2023	6,369	No	Not active
Roza Creek	Yakima River Canyon near Ellensburg	June 28, 2023	700	No	Not active
Kindy Creek	Near Mt. Buckindy in North Cascades	August 16, 2023	193	No	Not active
Ten Dollar	10 miles Southeast of Ellensburg	September 10, 2023	182	No	Not active

**c. Whether the utilities’ operations were impacted by fires, and, if so, how and where.**

PSE’s operations were not impacted by the four Large Fires noted above. However, two smaller fire incidents occurring within PSE’s service territory in July and August 2023 resulted in requests from local emergency response personnel to de-energize portions of PSE’s distribution system to ensure responder safety.

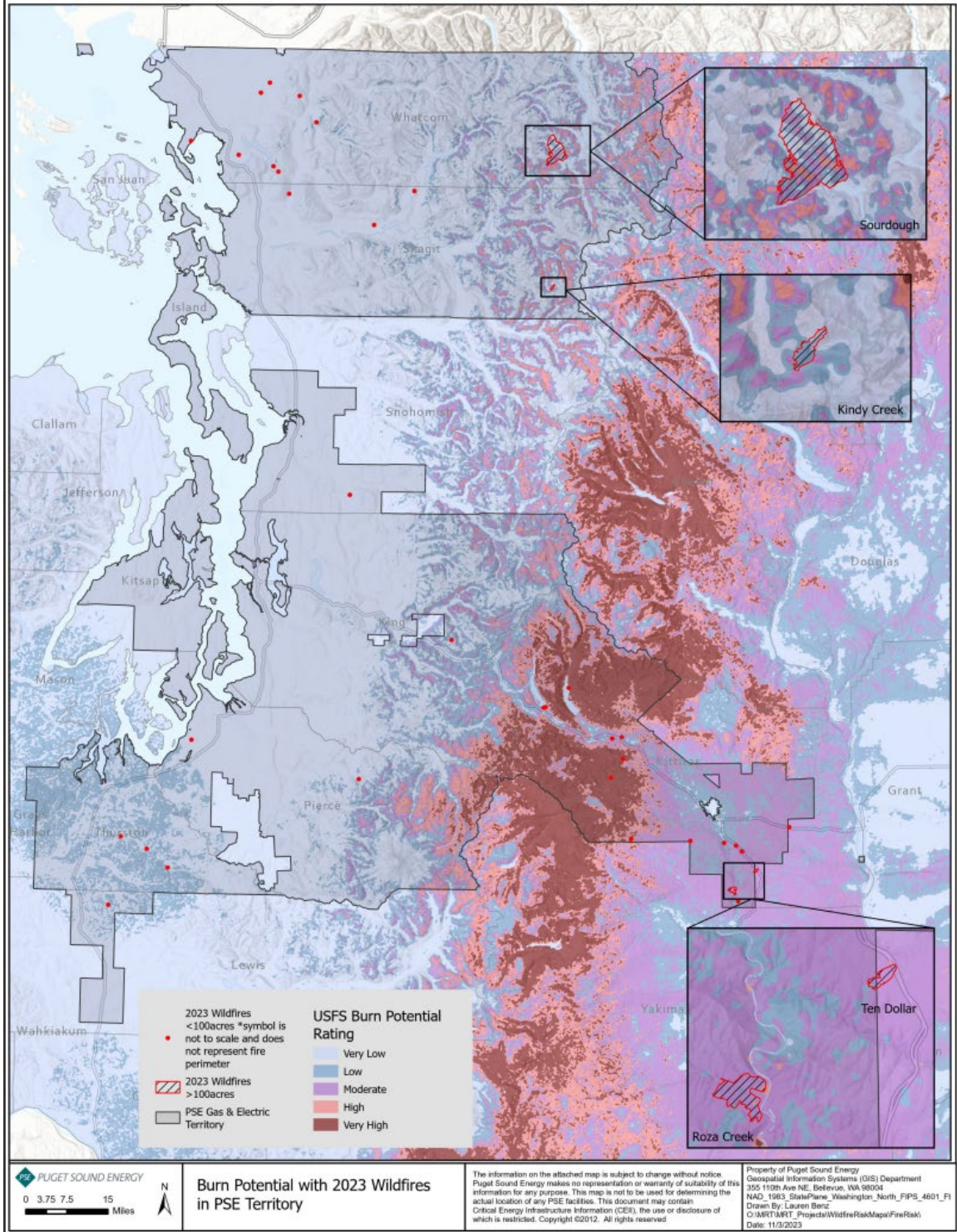
- On July 6, 2023, PSE received a request from the Thurston County Department of Natural Resources to de-energize an overhead distribution line that ran above a brush fire in the McKenna/Roy area. This de-energization resulted in 472 customers losing power for approximately six hours.
- On August 4, 2023, PSE received a request from Pierce County 911 dispatch to de-energize a distribution line so that responders could safely extinguish a fire near 7110 146th St SW in Lakewood. This de-energization resulted in 516 customers losing power. Most of these customers (471) had power restored within an hour; power was restored to the remaining customers at various times.

**d. Whether wildfires developed in areas defined as greater risk or in other areas designated as lesser risk.**

Section 3 of the 2023 Wildfire Plan describes PSE's wildfire risk assessment process, including the geospatial data inputs and PSE asset information that inform the risk assessment process.

No PSE electric or natural gas equipment or infrastructure was located within the perimeters of the Large Fires that occurred in PSE's service territory in 2023. As a result, PSE's risk model does not produce a specific risk rating for the geographic areas in which these Large Fires occurred. However, based on the geospatial data and inputs that inform PSE's risk modeling process, these fires did occur in areas that the United States Forest Service (USFS) identifies as moderate to high burn potential. Please see Figure 1 below, which illustrates the fires that occurred in PSE's service territory in 2023 in relation to USFS burn potential data.

Figure 1: Burn Potential with 2023 Wildfires in PSE Territory



**e. Whether thresholds for use of the current set of fire mitigation tools (such as public safety power shut offs and dry land mode) are effective, if they have been working as intended, and if any new tools have been added or are needed.**

Yes, PSE's fire mitigation tools were effective during the 2023 wildfire season. PSE continuously evaluates whether adjustments to mitigation strategies are necessary. In 2024, PSE anticipates continued evolution of its wildfire risk model and real-time situational awareness tools. PSE is continuing to develop its PSPS protocols for the 2024 wildfire season. In concert with PSPS planning, PSE is assessing potential new system protection tools and settings that would further aid in mitigation efforts and help to ensure that PSE's PSPS tool is in fact a tool of last resort. Smoke detecting cameras and weather stations are additional tools that are planned to be installed in higher risk areas by the 2024 wildfire season.

**2. What updates have been made to wildfire mitigation plans since November of 2022?**

As noted above, PSE has incorporated several updates in the 2023 Wildfire Plan. The following list outlines the key updates and improvements. These updates are described in greater detail in the respective sections of the 2023 Wildfire Plan.

- An updated risk model with additional granularity of historical weather and fuel risk (*section 3.2*).
- A new objective that embeds equity into planning and execution processes (*section 2.3*).
- Matured wildfire response plans, including progressing the development of a PSPS plan (*section 4*).
- New design and construction standards for use in higher wildfire risk areas to influence the scoping and materials installed on distribution projects in defined wildfire zones (*section 4*).
- A Charter for PSE's Wildfire Mitigation Task Force that clearly identifies roles and responsibilities associated with ongoing work to maintain and mature the Wildfire Mitigation Program (*section 2.6*).
- Key performance metrics that will be used to track the progress and performance of the Wildfire Mitigation Program (*section 2.5*).
- A new outage model that will be applied to prioritize future grid-hardening portfolios (*section 3.2.7*).



- A process for capturing ignition data to enhance PSE’s ability to report on wildfire season experiences, identify trends for correction, and improve situational awareness for planning and maintenance engineers (*section 4.1.4*).

**3. Whether communication plans worked as intended and any gaps identified.**

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

Section 6 of the 2023 Wildfire Plan describes PSE’s primary focus areas for communications and outreach regarding wildfire. Section 6 highlights that PSE’s wildfire communications and outreach strategies focus on (1) education and awareness, (2) equitable customer involvement, and (3) timely communications during an emergency. PSE’s communications and outreach plans proved effective in 2023.

In 2023, PSE’s primary objective for enhancing education and awareness was to provide a foundation of wildfire-related information for all customers across PSE’s service territory. PSE provided information on its wildfire mitigation and response program, steps customers can take to reduce risk and prevent wildfires, and resources available to help customers prepare their families, homes, and communities for wildfire season. This campaign included the following specific actions:

- Updates to PSE’s wildfire program [webpage](#).
- Sharing PSE’s vegetation management and wildfire preparedness [fact sheet](#), which includes information about how customers can report danger trees to PSE.
- A lead article on wildfire safety in PSE’s June 2023 edition of “The Voice” customer [newsletter](#) and featured on the PSE.com homepage during wildfire season.
- Social media posts with wildfire season preparation and safety tips.

In addition, PSE conducted targeted outreach in areas at highest risk for wildfire, including the areas where PSE held community meetings regarding wildfire planning in late 2022. In 2023, PSE sent pre-season email and postcard correspondence to customers in these areas, which included more detailed wildfire season preparation and safety information, detailed information about PSE’s vegetation management practices, any relevant system hardening projects, and follow-up information from PSE’s 2022 community meetings.

**b. What partnerships has the utility cultivated with first responders, land managers, and emergency operations personnel in preparing for the 2023 wildfire season?**

PSE plans for and responds to many types of emergencies, including wildfires, and thus continues to cultivate a variety of strong and mutually beneficial partnerships with first responders; city, county, and State emergency management departments and personnel; law enforcement, fire, and sheriff departments; and state agency partners. PSE routinely connects with these key partners—both before wildfire season and throughout the year—to coordinate, prepare, and update contact lists.

Before the 2023 wildfire season, PSE again collaborated with these entities through participation in county emergency management summer hazards workshops and numerous community events focusing on wildfire and emergency preparedness. Of note, PSE participated in the Department of Commerce’s pre-wildfire season workshop in Ellensburg, WA, and in several community events focused on wildfire and emergency preparedness with the State Department of Natural Resources (DNR). In 2023, these community events included: a Wildfire and Disaster Info Fair in Buckley, WA; the Daffodil Festival and Parade in Orting, WA; the Day of Preparedness event on Bainbridge Island; and the Preparedness Fair on Whidbey Island. PSE staff distributed wildfire preparedness and vegetation management fact sheets at these events and various other community tabling events, such as local farmer’s markets and festivals. PSE also invited DNR’s Pierce County Fire Management Officer to a preseason wildfire response training, and through this opportunity learned more about how PSE and DNR can better support one another during a wildfire incident.

In addition to these preseason preparation and coordination measures, PSE also participates in year-round advisory boards, working groups, and coordination meetings. These ongoing initiatives include the King County Emergency Advisory Committee, the Thurston County Fire Chief’s monthly meetings, the Pierce County Wildfire Coordination Group, the DNR Utility Wildland Fire Prevention Advisory Committee, and the Pacific Northwest Utility Wildfire Work Group. The combination of these preseason and throughout-the-year actions and partnerships have proved extremely valuable. Attending community preparedness events hosted by local governments and emergency response agencies enabled PSE to enhance relationships and better understand nuances in emergency response across the diverse communities and jurisdictions within PSE’s service territory.

**c. What communication channels and procedures are in place to coordinate planning and response efforts with these entities?**

As detailed above, PSE has long-established relationships with emergency management and fire agency partners across the service territory. In addition to the preseason activities described above, PSE also participates in meetings and after-action debriefings pertaining to various emergencies regardless of the cause or nature of the



emergency. PSE's emergency management department also assists in providing information related to emergency response and coordination.

The Commission, State Emergency Operations Center, county Emergency Operations Centers, and many local Emergency Operations Centers also receive situation reports when PSE activates its Emergency Coordination Center. When not activated, PSE sends status emails, when deemed appropriate, to the Commission's Emergency and Resilience Manager and to affected county Emergency Operations Centers through PSE's emergency management department. These entities also reach out to PSE's emergency manager, and PSE's municipal liaisons and government affairs teams are in contact with state and local elected officials as needed.

Additionally, PSE provides familiarization and safety training to emergency personnel who may respond to fires involving natural gas or electric infrastructure. PSE also provides emergency contact information to emergency response agencies to ensure they are able to contact us during an emergency.

In addition to the educational outreach and information sharing described above, PSE has also implemented communications protocols with local agencies and jurisdictions during wildfire season regarding Red Flag Warnings in PSE's service territory. These specific event-based communications detail the area and time of impact for a Red Flag Warning, the forecast details from the National Weather Service, and the steps PSE is taking to mitigate risks during the Red Flag Warning. Through these specific communications, PSE provides information and resources for local agencies and jurisdictions to share with their constituents.

**d. How were those partnerships leveraged in the utility's wildfire response?**

As noted above, PSE coordinates with city, county, and state emergency management agencies, including DNR, prior to wildfire season and as needed during wildfire season, depending on the specific type of response effort. In 2023, the only events that required PSE to leverage these partnerships during incident response were the two de-energization events described above in response to question 1(c). For one of the Large Fires described in response to question 1(a), PSE also assigned an Electric Operations resource to coordinate with the incident response team, who confirmed that the fire was not near and did not impact PSE's system.

**e. 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?**

PSE is committed to understanding customer concerns and including customer feedback in wildfire planning. PSE therefore took additional steps in 2023 to identify

customers within vulnerable populations and highly impacted communities, as well as the specific communication and resource needs of these communities in order to provide equitable outreach to customers. Particular focus was given to reaching vulnerable and hard-to-reach populations using new tools, which include:

- Translated/transcreated educational materials.
- A web-based accessibility and translation tool on PSE.com.
- Engagement and information sharing with jurisdictions and community organizations serving vulnerable populations and highly impacted communities.
- Tabling at key locations or community events in higher wildfire risk communities.
- Development of meeting-in-a-box content for PSE Community Engagement team members, who are already connecting with community organizations on other topics daily.

Additionally, a targeted email/postcard was sent to customers in areas at highest risk for wildfire, which included the same areas where community meetings were held in 2022 to discuss PSE's wildfire program and topics related to PSPS planning. These communications included follow-up information and summaries from the 2022 community meetings.

As PSE has continued to mature its risk model and advance efforts to develop a PSPS plan, PSE has used tools such as the U.S. Environmental Protection Agency's Environmental Justice Screening and Mapping Tool to identify customers with potentially unique needs, including older adults (age 65 and over), low-income residents, people who rely on electricity for medical equipment, and non-English speaking residents. This data has helped PSE better understand vulnerable customers who may be impacted by PSE's wildfire mitigation program, including potential future PSPS events.

PSE will continue to incorporate equity into its system-hardening projects and community outreach and communications plans for PSPS consistent with our business plan and the four core tenants of energy justice. PSE is continuously working to build and strengthen partnerships with community organizations, agencies, and jurisdictions, including partners that serve highly impacted communities and vulnerable populations.

**i. How effective was customer communication regarding wildfire events? Where there any lessons learned?**

Customer communication during specific events was effective in 2023. As noted above, there were two specific events that resulted in de-energization, both of which were

in response to requests from local emergency agencies or first responders.<sup>2</sup> During each event, PSE registered the outage on PSE's outage map. Automated communications were sent to all impacted customer account contacts per their preferred method (text, email, or robo-call) at the start of the outage, as a status update, and after restoration of the outage. These practices followed PSE's standard customer communications protocols for any unanticipated outage. Neither of the two safety-driven de-energization outages were long enough in duration to necessitate additional customer communications. Media messages focused on the purpose of the de-energization (i.e., for first responder safety) and directed reporters to incident commanders for more details on the status of each fire.

**ii. If communications were not distributed to all customers, please explain who was excluded and why.**

PSE communicates situational awareness to all customers as described in the response to question 3a. In addition to these system wide communications, PSE communicates outage information for de-energizations requested by emergency responders only to the customers impacted by the outage and non-customers that have opted-in to notifications for a specific outage event via PSE's outage map. Also described in response to question 3(a), PSE conducted targeted outreach in areas at highest risk for wildfire including the areas where PSE held community meetings regarding wildfire planning in late 2022.

**f. What information did the utility provide to customers about the wildfire risk mitigation work it is performing?**

As noted throughout this response and in section 6 of the 2023 Wildfire Plan, PSE provided information to customers as part of PSE's comprehensive education and outreach campaign about the elements of the 2023 Wildfire Plan, including pre-wildfire season inspections, system hardening projects, vegetation management, and operational procedures and emergency response. PSE also continues to share updates with affected communities as PSPS planning efforts develop.

**4. What local, state, federal, or other privately funded research, pilots, or programs exploring emerging wildfire mitigation technologies or best practices are you participating in?**

In 2024, PSE will be implementing a pilot project to install high-definition cameras with artificial intelligence capabilities on two higher risk transmission lines.

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<sup>2</sup> While PSE's de-energization of electric lines during an emergency has some elements in common with a PSPS event, it is important to ensure that customers and the community understand the difference between the two responses. Emergency de-energization takes place during an active wildfire, at the request of emergency management, to keep first responders and the public safe. This is an existing safety measure that PSE uses today. By contrast, a PSPS event would de-energize certain lines in high-risk areas *prior to* an active wildfire, to help prevent one from starting. This tool is still in the development process and is not yet in use by PSE.

These cameras have the ability to detect smoke that is specific to wildfires, including during periods of poor visibility, such as nightfall. PSE is looking for opportunities to collaborate with other agencies including DNR in future years after completing the pilot work to install these cameras and test them in 2023.

PSE also participates in industry meetings and meets frequently with wildfire program staff at peer utilities that operate in other parts of the country with high fire weather risk. During these meetings, PSE staff discuss various approaches to wildfire mitigation response and understand emerging trends in wildfire mitigation practices within the utility industry. PSE staff have learned a great deal about the various elements that make up a strong wildfire mitigation program, including using state of the art wildfire risk models that PSE is currently implementing.

PSE is planning to participate in EPRI's program focused on improving grid safety and resilience to mitigate ignition incidents and fire risks. This is a two-year program planned to begin in December 2023.

**5. For companies with wildfire-related insurance policies covering a multi-state service territory, how are these insurance costs delineated between customers in different states for recovery?**

This question is not applicable to PSE.

**6. Please provide a narrative response on the impact wildfire risk is having on insurance costs, and what work utilities are doing to mitigate that impact.**

With respect to casualty insurance, the pricing for insurance coverage has increased sharply since 2019 due to large losses incurred and paid by utility insurers from wildfire loss events in regions of the US where wildfire risk and claims severity have historically been low. Additionally, insurance coverage for wildfire is becoming more difficult to secure because fewer insurance companies are willing to insure the risk, or they are offering very limited capacity. Increased wildfire risk has prompted utilities to implement enhanced fire mitigation strategies including operational changes, additional or enhanced inspections, grid hardening and equipment upgrades, and vegetation management strategies. These enhancements are communicated with underwriters as we compete with other utilities for the limited wildfire insurance capacity available in the marketplace. To mitigate the impact of these developments, PSE has expanded its target to include additional potential markets (domestic, UK and Bermuda) and is considering a range of options including captive structures, i.e., a form of self-insurance, and co-insurance.

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Washington Utilities and Transportation Commission

Please contact Michelle Boll, Senior Program Manager – Wildfire Mitigation, at [Michelle.Boll@pse.com](mailto:Michelle.Boll@pse.com) or (425) 424-7303 for additional information about this filing. If you have any other questions, please contact me.

Sincerely,

*/s/ Wendy Gerlitz*

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Attachment: 2023 Wildfire Mitigation and Response Plan