

November 14, 2023

U-210254

VIA ELECTRONIC FILING

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

Received
Records Management
Nov 14, 2023

RE: Docket U-210254—PacifiCorp’s Responses

On October 17, 2023, 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 2023 wildfire season. In the notice, the Commission requested that utilities respond to the following requests for information and questions.

PacifiCorp responds to the Commission’s questions below.

- 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.**
 - b. The intensity of fires in the 2023 season.**
 - c. Whether the utilities’ operations were impacted by fires, and, if so, how and where.**
 - d. Whether wildfires developed in areas defined as greater risk or in other areas designated as lesser risk.**
 - 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.**

As outlined below in Table 1, PacifiCorp is aware of eight (8) fires which occurred in PacifiCorp’s Washington service area in 2023 and were reported by fire suppression agencies. None of these fires had impacts to utility infrastructure or operations. In addition, PacifiCorp field personnel reported three (3) fire incidents were reported by the field, that were less than 0.25 acres in size and did not impact utility operations. See Table 1 for additional intensity, location, and impact information.

Table 1 : Wildfire Season Data

Fire Name	Date Initiated	General Location	Approximate Size (Acreage)	Buildings Impacted	Utilities Operations Impact?	FHCA (Yes/No)
Old Naches	6/7/2023	Yakima, WA	650	Unknown	None	No
Hat Rock	6/13/2023	Walla Walla, WA	16,800	Unknown	None	No
Oasis	6/19/2023	Walla Walla, WA	4250	Unknown	None	No
Roza Creek	6/27/2023	Kittitas, WA	700	Unknown	None	No
N/A	7/2/2023	Yakima	<.25	Unknown	None	No
Selah Cliffs	7/5/2023	Yakima, WA	200	Unknown	None	No
Burbank Valley	7/20/2023	Yakima, WA	40	Unknown	None	No
N/A	8/26/2023	Yakima	<.25	Unknown	Outage	No
N/A	8/27/2023	Walla Walla	<.25	Unknown	Outage	No
Tendollar	9/10/2023	Kittitas, WA	200	Unknown	None	No
South Slope	9/12/2023	Yakima, WA	400	Unknown	None	No

PacifiCorp did not implement a PSPS in Washington during the 2023 fire season. Conditions were monitored across the company's service territory using dynamic, situational awareness models and weather station data. These models were also used to assess risk and inform activation of Elevated Fire Risk (EFR) settings, which are modifications to protection and control schemes to mitigate incremental risk. (PacifiCorp understands that PacifiCorp's EFR settings are functionally similar to the "dry land mode" used by other utilities.) PacifiCorp uses engineering evaluations of fire mitigation strategies, informed by collaboration with subject matter experts in the industry, to adjust the operations and align with recent studies, experiences in conferences, and analysis conducted by other utilities. Generally, the relay schemes have been functioning as intended, responding rapidly to fault conditions to limit arc energy and minimize the operation of fused elements on the system. Although the use of multiple reclosing attempts is beneficial for reliability, engineering evaluation of recent studies and industry analysis indicates that multiple reclosing attempts pose an increased fire ignition potential. Therefore, PacifiCorp sometimes strategically limits automatic reclosing

attempts on certain circuits, based on situational awareness of wildfire risk. During the 2023 Fire Season, the use of EFR mode limited fuse interruptions during system fault conditions.

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

Section	Description of Update
1. Risk Analysis and Drivers	Plan for FHCA Map Refresh
2. Situational Awareness	Incorporation of Advanced Forecasting Software
3. Inspection and Correction	Transmission IR inspections
8. PSPS	Expansion of program and preparedness to all of Pacific Power’s service territory.
12. Plan Monitoring and Evolution	Seeking grant opportunities for cost sharing

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

As discussed in the education and awareness strategy, PacifiCorp provides wildfire safety and preparedness and public safety power shutoff education through a variety of channels. The company maintains an education and awareness strategy that is flexible and allows for a dynamic communications plan, informed by engagement campaign data, community stakeholder input, and community needs. The strategy includes an annual engagement campaign that covers radio, newspaper, digital, and social media ads to promote wildfire safety and preparedness. Additionally, print, and digital pieces were developed that includes factsheets, flyers, brochures, infographics, and safety checklists. The Pacific Power website also provides comprehensive information on company wildfire mitigation programs, general wildfire safety, PSPS information, and more.

During the 2023 season, there was additional messaging that sent to customers to explain the impact of elevated fire risk settings to customers. When EFR settings are enabled on a circuit, it may cause an increase in service interruptions for the customers on the circuit where the settings are being activated. The messages were to inform the customers of the potential impact.

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

PacifiCorp participates in multiple Public Safety Partner meetings and workshops throughout the calendar year across its service territory. Meetings may include monthly,

quarterly, and annual County and State Emergency Management partner meetings, in addition to pre- and post-fire season collaboration meetings with local, state, and federal fire suppression agencies. Additionally, the company conducts workshops that are more local, targeted discussions that build upon general outreach to further compare and refine plans, streamline processes, and confirm capabilities (such as customer outreach, critical facilities and community resource center locations and operations) with local public safety partners.

b) What communication channels and procedures are in place to coordinate planning and response efforts with these entities?

PacifiCorp actively monitors real-time weather conditions. When real-time observations and weather forecasts indicate extreme risk, a de-energization watch protocol is initiated and communication with public safety partners begins. These communications start as early as possible when weather forecasts indicate a PSPS event is possible to allow public safety partners to prepare for anticipated operational impacts internally and mitigate any community-wide impacts that may occur because of de-energization.

Upon activation of the ECC, emergency management resources also coordinate, as appropriate, with local, county, tribal, and state emergency management to provide information through the assigned representative of the agency. ECC-assigned staff provide event details including estimated timing and event duration, potential customer impacts, and GIS shapefiles that include PSPS boundaries for areas subject to de-energization. Throughout a PSPS event, PacifiCorp's emergency management group maintains regular communication with local, regional, and state emergency responders, mutual assistance groups, tribal emergency managers, and other entities as applicable. The company will also support efforts to send out emergency alerts and status updates, as appropriate, until restoration efforts begin.

Critical facilities are particularly vulnerable to the impact of PSPS events. PacifiCorp emergency management maintains a list of critical facilities within its service territory. Upon activation of an ECC, they will also work to establish and maintain direct contact with these facilities' emergency points of contact to provide projected PSPS timing, estimated duration, regular status updates, and restoration notifications. Additionally, PacifiCorp will provide, where possible, GIS shapefiles to communications facility operators in potentially impacted areas.

c) How were those partnerships leveraged in the utility's wildfire response?

While Washington-specific partnerships were not leveraged specifically due to a wildfire response, PacifiCorp did engage with partners throughout the year in workshops and outreach. Completed 2023 partnership events included a PSPS workshop in Yakima, WA, participation in the Washington UTC Utility Pre-Wildfire workshop, and presenting at the Joint Columbia/Walla Walla County LEPC meeting.

d) *What plans did the utility have in place to communicate with customers, including Highly Impacted Communities, Vulnerable Populations, medically vulnerable season overall, as well as specific wildfire risks or events?*

For the past several years, the company has deployed some form of paid media campaign to raise awareness and action on wildfire safety and preparedness. The 2023 wildfire safety and awareness paid advertising campaign, which launched March 20, 2023, and concluded October 1, 2023, included digital pre-roll video ads (Hulu, Pluto TV, Roku, etc.), digital audio ads (Spotify, Pandora, etc.), and social media ads (Facebook, Instagram) – each delivered in English and Spanish.

Various resources and tools for community preparedness can also be found on the Pacific Power wildfire mitigation webpage. Prompts for customers to update their contact information are displayed prominently on the page. Guides and checklists for creating an emergency plan/outage kit are easily accessible. The wildfire safety webpages also include links to videos describing key components of its wildfire mitigation plans. Overall, site visitors have a variety of ways to consume and engage with wildfire safety and preparedness information.

The Pacific Power Public Safety Power Shutoff webpage provides educational material on PSPS. It describes why a PSPS would happen, includes details of conditions monitored prior to executing a PSPS, and on how customers can prepare. Information on how customers will be notified, what to expect during an event, and about the service restoration process if a PSPS is deemed necessary are detailed on the webpage. There is also an interactive map of PSPS areas that provides a visualization of whether the company is considering a PSPS, and which areas might be affected if one is necessary. Additionally, the company's PSPS communications plan also includes procedures that ensure appropriate notifications (additional if time allows) to medically vulnerable customers. The utility leverages insight from its partners and customer records to pre-identify these customers. Upon activation of the ECC, customer care agents will attempt, time and circumstances allowing, to make personal outbound calls with known vulnerable customers.

i) *How effective was customer communication regarding wildfire events? Were there any lessons learned?*

There were no PSPS events in Washington in 2023, hence, limited opportunity for PacifiCorp to evaluate the success of its customer communication plan during PSPS events in Washington. However, the company is in the process of conducting an annual customer survey in Oregon and California to assess, more broadly, the level of customer satisfaction with its preparedness and PSPS communications. A subset of survey questions is designed to solicit feedback from customers on PSPS events. This feedback may be used to inform the company's approach to customer communications during PSPS events throughout its service territory.

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

Communications like the online webinars are available to all customers in Washington. Additionally, the PacifiCorp's ad marketing campaign went to all Washington customers, regardless of location.

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?

- a) PacifiCorp is monitoring potential cost sharing and partnership opportunities to secure federal and state grant funding and offset the potential impacts to customers. Many of PacifiCorp's wildfire mitigation programs, such as grid hardening, which includes investment in transformational technology, align with the goals and objectives of potential grant funds. PacifiCorp began to pursue opportunities in 2022 with the intent to obtain funding opportunities, potentially beginning in 2024, where appropriate.
- b) As a utility best practice and with experience of the inspection in other states, PacifiCorp began using infrared imaging to inspect the transmission lines in Washington. The technology identifies thermal rises in equipment which could be issues undetected through other inspection types. Being able to identify and issue not detectable through other inspection methods and correcting them prior to them becoming a failure reduces the wildfire risk with the associated equipment identified.

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?

On October 27, 2023, PacifiCorp submitted rebuttal testimony in its 2023 general rate case discussing insurance premiums.¹ For greater context and ease of review by participants in this proceeding, the Company is attaching the rebuttal testimony of witness Mariya V. Coleman to these comments.

PacifiCorp's insurance premiums are allocated to each of its six states using the 2020 Interjurisdictional Allocation Protocol (2020 Protocol) and the Washington Inter-Jurisdictional Allocation Methodology (WIJAM).²

¹ *WUTC v. PacifiCorp, d/b/a Pac. Power & Light Co.*, Docket No. UE-230172, Rebuttal Testimony of Mariya V. Coleman (Oct 2023)

(<https://apiproxy.utc.wa.gov/cases/GetDocument?docID=3785&year=2023&docketNumber=230172>).

² *WUTC v. PacifiCorp, d/b/a Pac. Power & Light Co.*, Docket Nos. UE-191024, UE-190750, UE-190929, UE-190981, UE-180778 (cons.), Final Order 09/07/12, ¶100 (Dec. 14, 2020).

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.

As discussed in PacifiCorp's rebuttal testimony, wildfire liability risk has had an unprecedented impact on commercial insurance markets and the premiums for available excess liability insurance coverage. During the pendency of this case, total-Company excess liability insurance costs have increased from approximately \$32.2 million to \$125.2 million, resulting in an approximately \$6.6 million increase on a Washington-allocated basis.

The Company is working to develop strategies to mitigate this impact and any future impacts to insurance premium costs.

PacifiCorp respectfully requests that all data requests regarding this matter be addressed to:

By e-mail (preferred): datarequest@pacificorp.com

Please direct informal questions to Ariel Son, Regulatory Affairs Manager, at (503) 813-5410.

Sincerely,

 /s/

Matthew McVee
Vice President, Regulation Policy and Operation
PacifiCorp
825 NE Multnomah Street, Suite 2000
Portland, OR 97232
(503) 813-5585
Matthew.Mcvee@PacifiCorp.com

Enclosure

210254-PAC-Washington-Wildfire-Mitigation-Plan-11-14-23

210254-PAC-Rebuttal-Testimony-Mariya-Coleman-11-14-23