



STATE OF WASHINGTON
UTILITIES AND TRANSPORTATION COMMISSION

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Via electronic service

Re: In the Matter of Utility Wildfire Preparedness, Docket U-210254

Dear Jon Piliaris, Patrick Ehrbar, and Ariel Son:

On May 26, 2021, the Washington Utilities and Transportation Commission (Commission) convened a recessed open meeting to hear from Washington state's regulated electric utilities about plans for the 2021 wildfire season. Presentations from Avista Corporation d/b/a Avista Utilities (Avista), Puget Sound Energy (PSE), and PacifiCorp d/b/a Pacific Power & Light (Pacific Power) included information on the utilities' fire mitigation strategies and

communications plans with state, federal, and local emergency response agencies, and the public. The Commission also heard from state and federal partners and land managers, including the federal Northwest Interagency Coordination Center and the Washington Department of Natural Resources about expected conditions for the 2021 wildfire season as well as updates on state and federal planning, collaboration, and emergency response.

During discussions at the open meeting, the utilities discussed their wildfire planning and preparation. Because a high-risk wildfire season is expected in 2021 with risk areas in each of the three electric utilities' service territories, Commission Staff believes that its understanding of utility wildfire risk and planning would be aided by submission in this docket of the utilities' written wildfire preparedness plans. Receiving these plans would allow Staff to perform a more thorough review of utility efforts and determine where additional Commission guidance could be helpful or necessary.

Accordingly, Commission Staff requires Avista, Pacific Power, and Puget Sound Energy to submit in writing their current or updated plans for wildfire mitigation and response. Commission Staff further requires Avista, Pacific Power, and Puget Sound Energy to respond to the following questions in their plan submissions:

1. What vegetation management strategies and actions are you taking to mitigate the risk and potential impact of wildfire in your service territory?
 - How do these actions differ, if at all, from business-as-usual vegetation management practices?
 - Has the utility identified areas of concern within its service territory? Where are they? What are the risks and how has the utility determined those risks? What strategies will the utility use to mitigate risks in these areas?
2. How is the utility considering infrastructure hardening in its plans?
 - What cost-benefit and risk analyses have been conducted in relation to any proposed infrastructure improvements?
 - What infrastructure hardening strategies have been identified for the utility's system, including areas at higher risk, and how is the utility considering investment in these strategies, as well maintenance of its infrastructure?
3. What strategies will the utility use or explore for this wildfire season to enhance situational awareness for utility operations and for its customers?
 - What information, datasets, or programs does the utility have at its disposal?
 - Are there specific deficiencies in information that the utility plans to address to prepare for this wildfire season?
 - What partnerships has the utility cultivated with first responders, land managers, and emergency operations personnel in preparing for this wildfire season?
 - What communication channels and procedures are in place to coordinate planning and response efforts with these entities?
 - What plans does the utility have in place to communicate with customers about wildfire risk for this season, as well as specific wildfire risks or events?

4. What operational tools are in the utility's toolkit for responding to wildfire events or potential triggers of wildfire events this season?
 - Do these tools include public safety power shutoffs (PSPS)?
 - If yes, what are the criteria, triggering events, provisions, or thresholds that would result in a utility implementing a PSPS?
 - What communication protocols are in place to notify and prepare customers, first responders, and state and federal emergency operations personnel of such an event? In particular, what are the utility's plans for communicating with medical and life support customers, vulnerable and low-income customers, and customers with limited English proficiency or other language or accessibility needs?
 - If PSPS is not part of a utility's toolkit, what provisions are in place as an alternative, specifically in circumstance where high winds and dry conditions are predicted? How does the utility plan to communicate these provisions with customers, including medical and life support customers, vulnerable and low-income customers, and customers with limited English proficiency or other language or accessibility needs?

Please electronically file completed plans that include all requested information in Docket UE-210254 no later than Friday, July 2, 2021. Failure to respond by the deadline may result in enforcement action.

If you have questions regarding this request, please contact me at (360) 664-1110 or amanda.maxwell@utc.wa.gov.

Sincerely,

/s/ Amanda Maxwell
AMANDA MAXWELL
Director, Consumer Protection and Communications