

April 14, 2022

U-210254
VIA ELECTRONIC FILING

 Amanda Maxwell
 Executive Director and Secretary
 Washington Utilities and Transportation Commission
 621 Woodland Square Loop S.E.
 Lacey, Washington 98503

 Received
 Records Management
 04/14/22 16:13
 State Of WASH.
 UTIL. AND TRANSP.
 COMMISSION

RE: Docket U-210254—PacifiCorp’s Responses

On March 18, 2022, the Washington Utilities and Transportation Commission (Commission) issued a Notice of Recessed Open Meeting to discuss utility preparedness ahead of the 2022 wildfire season. In the notice, the Commission requested that utilities submit updated plans for wildfire mitigation and respond to several questions either within their plans or by separate filing.

PacifiCorp responds to the Commission’s questions below and encloses its updated wildfire mitigation plan. In addition, if the Commission is planning to require an update to utility wildfire plans on an annual basis, PacifiCorp suggests that late winter or early spring (January – March) is likely the most appropriate timeframe for an update filing.

PacifiCorp’s Responses:

- Please provide a synopsis of the utility’s experience with the 2021 fire season. Please identify the fire events that happened in your service territory, the location of those events, and how much damage to utility infrastructure and local communities occurred, if any.***

In 2021, PacifiCorp operations was impacted by five fire related events in Washington, four of which resulted in disruption of service on one or more circuits as summarized below. No significant damages to third parties were reported.

| Date | General Location | Size (Meters of Linear Travel) | General Cause | Service Interruption / Outage? | Impacted Equipment |
|-----------|------------------|--------------------------------|------------------------------|--------------------------------|---------------------|
| 4/10/2021 | Grandview, WA | <3 meters of linear travel | Utility Related - Vegetation | Yes | SECONDARY CONDUCTOR |
| 4/21/2021 | Woodland, WA | 0.26-9.99 | Utility Related - Vegetation | Yes | JUMPER WIRE/STIRRUP |
| 5/6/2021 | Burbank, WA | 0.26-9.99 | Utility Related - Vegetation | Yes | PRIMARY CONDUCTOR |

| Date | General Location | Size (Meters of Linear Travel) | General Cause | Service Interruption / Outage? | Impacted Equipment |
|-----------|------------------|--------------------------------|---|---|-----------------------------------|
| 7/4/2021 | Walla Walla, WA | <3 meters of linear travel | 3 rd Party Cause | No | N/A – No equipment impacted |
| 8/15/2021 | Ariel, WA | 0.26-9.99 | 3 rd Party Cause - Potential Human Cause | Yes – requested to support emergency services | STRUCTURES, INSULATORS, CONDUCTOR |

2. How is the utility identifying areas of greatest wildfire risk within its service territory? Where are those areas located?

- **What data is being used in this analysis?**
- **What modeling is the utility using to predict periods of heightened wildfire risk based on high winds or other factors contributing to the sparking or spread of wildfire?**
- **What strategies is the utility using to mitigate risk in each of its service territory risk areas? Do those strategies change during times of heightened wildfire risk?**

See Section 1 – Risk Analysis and Drivers of PacifiCorp’s 2022 Pre-Rulemaking Draft Wildfire Mitigation Plan to understand baseline risk and data inputs. Seasonal or dynamic risk is assessed through Situational Awareness discussed in Section 2 – Situational Awareness.

3. What lessons, if any, did the utility learn in the 2021 wildfire season, and how have these lessons changed plans for the 2022 wildfire season, if at all?

In 2021, 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 alternate protection and control schemes included in Section 6, augmented work practices described in Section 7, or the implementation of a PSPS event outlined in Section 8. In 2022, PacifiCorp plans to continue advancing its situational awareness capabilities through investment in additional datasets, an enterprise type fire risk assessment software, and additional processes and protocols to actively monitor risk throughout the year.

4. Is the utility aware of best practices for utility wildfire mitigation implemented in other jurisdictions? Please identify these best practices, the source of these best practices, and any steps the utility is taking to incorporate these best practices into its own wildfire mitigation practices.

See Section 11 – Industry Collaboration for more information on PacifiCorp’s general industry collaboration and sharing of best practices.

Examples of best practices shared through these various channels and ultimately incorporated into the company’s WMP include the implementation of grid hardening tactics such as covered conductor in Section 5.1, the evolution of situational awareness through acquisition of weather station data and dynamic risk modeling in Section 2, changes to asset inspection and correction practices outlined in Section 3, and the expansion of services included at Community Resource Centers when deployed to mitigate the impact of PSPS events on communities in Section 8.7.

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

See Section 11 – Industry Collaboration for more information on PacifiCorp’s general industry collaboration and sharing of best practices. Specific to research pilots or programs, PacifiCorp is currently piloting the use of Distributed Fault Anticipation (DFA) technology on distribution circuits.

6. *What vegetation management strategies and actions are you taking to mitigate the risk and potential impact of wildfire in your service territory for 2022? o How do these actions differ, if at all, from business-as-usual vegetation management practices? What changes, if any, has the utility identified or made for the 2022 wildfire season compared to the 2021 fire season?*

- o *Is the utility prioritizing vegetation management according to areas of greatest risk? If so, please describe.*
- o *What technical methods (aerial, on-the-ground, etc.) does the utility use to inspect vegetation near its equipment throughout its service territory. What is the frequency of vegetation inspections?*

See Section 4, which includes regular and enhanced vegetation management practices deployed in Washington, including frequency, trimming standards, and risk-based prioritization within the FHCA.

7. *How is the utility considering infrastructure hardening in its wildfire mitigation plans for 2022?*

- o *What infrastructure hardening strategies have been identified for the utility’s system, including areas at higher risk for fire?*
- o *How do these strategies compare to peer West Coast utilities with similar serviceterritory characteristics?*
- o *How often does the utility inspect its infrastructure, particularly in*

areas of heightened fire risk? What type of inspections are performed (aerial, on-the-ground, etc.)?

- *How are planned grid hardening activities being balanced or coordinated with vegetation management activities? How is general maintenance of infrastructure being balanced or considered in tandem with wildfire-related infrastructure hardening?*

See Section 5 – System Hardening of PacifiCorp’s 2022 Pre-Rulemaking Draft Wildfire Mitigation Plan to understand planned investments. The system hardening investments are also summarized in the Introduction.

8. *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, such as those compiled and managed by federal agencies like NOAA, does the utility have at its disposal to enhance situational awareness? What new technologies such as enhanced weather forecasting or LIDAR scans of transmission lines are you using to prepare for the wildfire season?*
- *Are there specific deficiencies in information that the utility plans to address to prepare for this wildfire season? What information deficiencies are challenging for the utility to address or resolve on its own?*
- *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?*
- *What plans does the utility have in place to communicate with customers, including highly impacted communities, vulnerable populations, and medically vulnerable customers, about wildfire risk for this season overall, as well as specific wildfire risks or events?*
- *What information will the utility provide customers about the wildfire risk mitigation work it is performing? 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?*

See Section 2 – Situational Awareness of PacifiCorp’s 2022 Pre-Rulemaking Draft Wildfire Mitigation Plan to understand planned advancements in situational awareness planned in 2022.

Section 9 includes PacifiCorp’s Public Safety Partner Coordination Strategy which includes planning activities involving Public Safety Partners, such as emergency management professionals, to prepare for the 2022 Fire Season.

Section 10 outlines PacifiCorp's Education and Awareness Strategy.

9. *What operational tools are in the utility's toolkit for responding to wildfire events or potential triggers of wildfire events this season, such as heatwaves or high wind events?*
- *Do these tools include public safety power shutoffs or other depowering/de-energization mechanisms such as more sensitive system settings that could trigger a power outage? Please explain any programs that result in customers' power being shut-off proactively or reactively due to fire risk.*
 - *What are the criteria, triggering events, provisions, or thresholds that would result in a utility implementing any depowering or de-energization mechanism?*
 - *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 the utility's wildfire mitigation plan includes public safety power shutoffs, what resources does the utility provide to impacted customers to mitigate customer impacts during a shutoff event?*
 - *If depowering in any form 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?*

See Section 8 – Public Safety Power Shutoff of PacifiCorp's 2022 Pre-Rulemaking Draft Wildfire Mitigation Plan to understand general methodology and protocols in place for executing a PSPS event. These include PSPS zone identification, decision making criteria, communication protocols, and customer support provisions, including available languages.

Additional planning and outreach in preparation for a PSPS event is further described in Section 9 – Public Safety Partner Coordination Strategy as well as Section 10 – Education and Awareness Strategy.

Conclusion

PacifiCorp appreciates the opportunity to provide this information and is committed to participating in this proceeding and informing the Commission and stakeholders on its wildfire efforts.

