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December 2, 2024

SENT VIA WUTC WEB PORTAL

Jeff Killip
Executive Director and Secretary
Washington Utilities and Transportation Commission
621 Woodland Square Loop SE
Lacey, WA 98503

**Re: 2024 Wildfire Mitigation Plans, Docket UE-240831, 240832, and 240836
Public Counsel's First Comments**

Dear Director Killip:

The Public Counsel Unit of the Washington State Attorney General's Office (Public Counsel) respectfully submits these comments in advance of the December 5, 2024, Open Meeting. These comments address PacifiCorp's (PAC), Puget Sound Energy's (PSE), and Avista's proposed 2024 wildfire mitigation plans. Public Counsel appreciates the utilities' previews provided to Public Counsel and other stakeholders to elicit feedback on the plans.

Public Counsel agrees with all other parties that wildfire risk has increased substantially in recent years and necessitates large-scale, effective preventive response measures. While Public Counsel appreciates the wildfire mitigation investments from these three utilities, prudent planning dictates that utilities should be collecting data and conducting ongoing cost-benefit analyses (CBAs) of the various mitigation techniques used for reducing wildfire risk. To properly conduct CBAs of their wildfire plans, utilities must ensure they are collecting complete and accurate data. After reviewing the filings, Public Counsel recommends that the Washington Utilities and Transportation Commission (Commission) include conditions to require collection of crucial data and to perform CBAs of their investments in mitigation strategies.

Public Counsel's Recommendation

Public Counsel recommends the Commissioners order utilities to 1) track and report utility-caused ignition events and the frequency with which they result in wildfire and 2) perform formal cost-benefit analyses on all wildfire mitigation techniques.

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A. Data Collection

Utilities collect data on a range of potential causes of wildfires, including tree fall-ins, pole fires, and overhead equipment failures. These wildfire risks are tracked through utilities' outage management databases. Only PAC tracks utility-caused ignitions separately from outages as sources of wildfires. The other two utilities, PSE and Avista, treat outages as a proxy for potential utility-caused ignition events. While it is important to track potential causes of wildfires, that data is incomplete unless utilities also track which of these outages also actually resulted in wildfires. Public Counsel recommends the Commission require all three utilities to collect and report data on utility-caused ignitions as part of their wildfire planning. This should include the frequency with which tracked outages, e.g., tree fall-ins, pole fires, etc. actually result in wildfires.

B. Cost Benefit Analysis

Staff recommends that these plans be approved as meeting the requirements of RCW 76.04.185, but Staff overlooks a key provision in RCW 76.04.185(2)(c) which specifies that wildfire mitigation plans must "incorporate cost-effective measures to minimize fire risk," to modify or upgrade facilities. None of the three plans contain CBAs that permit a determination about whether the specific upgrades planned by the utilities are, in fact, cost-effective. For example, these plans do not evaluate whether deploying additional vegetation management measures would be more efficacious at preventing wildfires than grid hardening or undergrounding wires. To determine where, when, and to what extent certain mitigation techniques should be employed, utilities should be ordered to perform formal CBAs to weigh risk reduction effectiveness against implementation costs. CBAs are the only means by which utilities can track cost-effectiveness of various mitigation techniques and adjust wildfire planning to ensure proper use of ratepayer-funded wildfire mitigation.

Public Counsel recommends the Commission order electric utilities to perform CBAs for all wildfire mitigation strategies as part of their formal wildfire mitigation plans.

Public Counsel appreciates the opportunity to submit these comments. If you have any questions about this filing, please contact Tad Robinson O'Neill at (206) 254-0570 or via e-mail at Tad.ONeill@ATG.WA.GOV, or Jean Marie Dreyer at (206) 389-3040 or via e-mail at JeanMarie.Dreyer@ATG.WA.GOV.

Sincerely,



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