



April 8, 2021

The Honorable Jeff Golden
Oregon Senate
Chair, Senate Committee on Natural Resources and Wildfire Recovery
900 Court Street NE, S-421
Salem, OR 97301

Dear Chair Golden:

On behalf of CTIA®, the trade association for the wireless communications industry, I write to request an amendment to Senate Bill 762, which requires a public utility to develop wildfire protection plans. Trying to maintain communications infrastructure during emergencies, including wildfires, is important to ensure communication links remain operational, particularly for public safety. For wireless carriers to prepare for de-energization events, they need adequate and detailed advanced notice. CTIA, therefore, requests an amendment providing that a public utility meet with communications providers to develop notification protocols when the utility plans to de-energize their grids. Specifically, CTIA suggests that following amendment to the current version of SB 762:

“Section 3.

“(2) A public utility that provides electricity shall regularly update a risk-based wildfire protection plan on a schedule determined by the commission. The plan must, at a minimum:

“(d) After seeking information from regional, state and local entities, including municipalities, identify a protocol for the deenergizing of power lines and adjusting of power system operations to mitigate wildfires. **Such protocol must consider the associated impact of such actions on** promote the safety of the public, **and including the impact on** first responders and preserve health and communication infrastructure. **The public utility must meet with communication infrastructure providers to develop mutually agreeable notification protocols, including the format and timing, in the event of a de-energization of power lines.**”

This amendment is similar to language adopted by the Public Utilities Commission of Nevada when it promulgated regulations related to de-energizations. The amendment will ensure that wireless carriers are involved in the development of notification protocols. For example, appropriate notification protocols will allow wireless carriers to know where to place assets, including back-up generators and fuel, if a de-energization event was to impact



communications infrastructure. CTIA members have had challenges in other states when proper protocols, including detailed notifications, were not in place before de-energization events. The proposed amendment will help mitigate those issues. For these reasons, we respectfully request the committee include the amendment in SB 762. Thank you for your consideration.

Sincerely,

/s/ Gerard Keegan

Gerard Keegan
Vice President
State Legislative Affairs