

PUC Wildfire Program Updates

Senate Natural Resources Committee

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September 30, 2025

Today's Presentation

PUC's Traditional
and Evolving
Safety Role

Progress since
SB 762 in 2021

Learning and
Future
Opportunities

Oregon Public Utility Commission (OPUC)

- Economic regulator of investor-owned utilities:
 - Electric – PGE, PacifiCorp, and Idaho Power
 - Natural Gas – NW Natural, Cascade, and Avista
 - Select landline phone and small water companies
- Broader role in utility safety and emergency support, including for COUs
- Quasi-judicial and policy functions
- 3 full-time Commissioners

Our mission is to ensure Oregonians have access to **safe, reliable and fairly priced** utility services that advance **state policy** and promote the **public interest**.

We use an **inclusive process** to evaluate differing viewpoints and visions of the public interest and arrive at **balanced, well-reasoned, independent decisions** supported by fact and law.

PUC Safety Role & Nationally Unique Safety Audits

Broad Safety Role: Require utilities to proactively manage all safety and reliability risks

Investor-Owned Utility Audits

- National Electric Safety Code (NESC) Programmatic Audits
 - One third of each system, each year
- Vegetation Management Audits
 - Now 50 to 80% of each system, each year

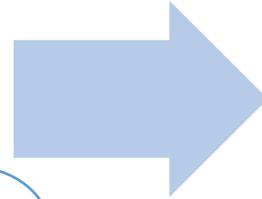
Consumer-Owned Utility Audits

- NESC / Vegetation Audit once every 3 years

Early PUC Wildfire Safety Work

2019

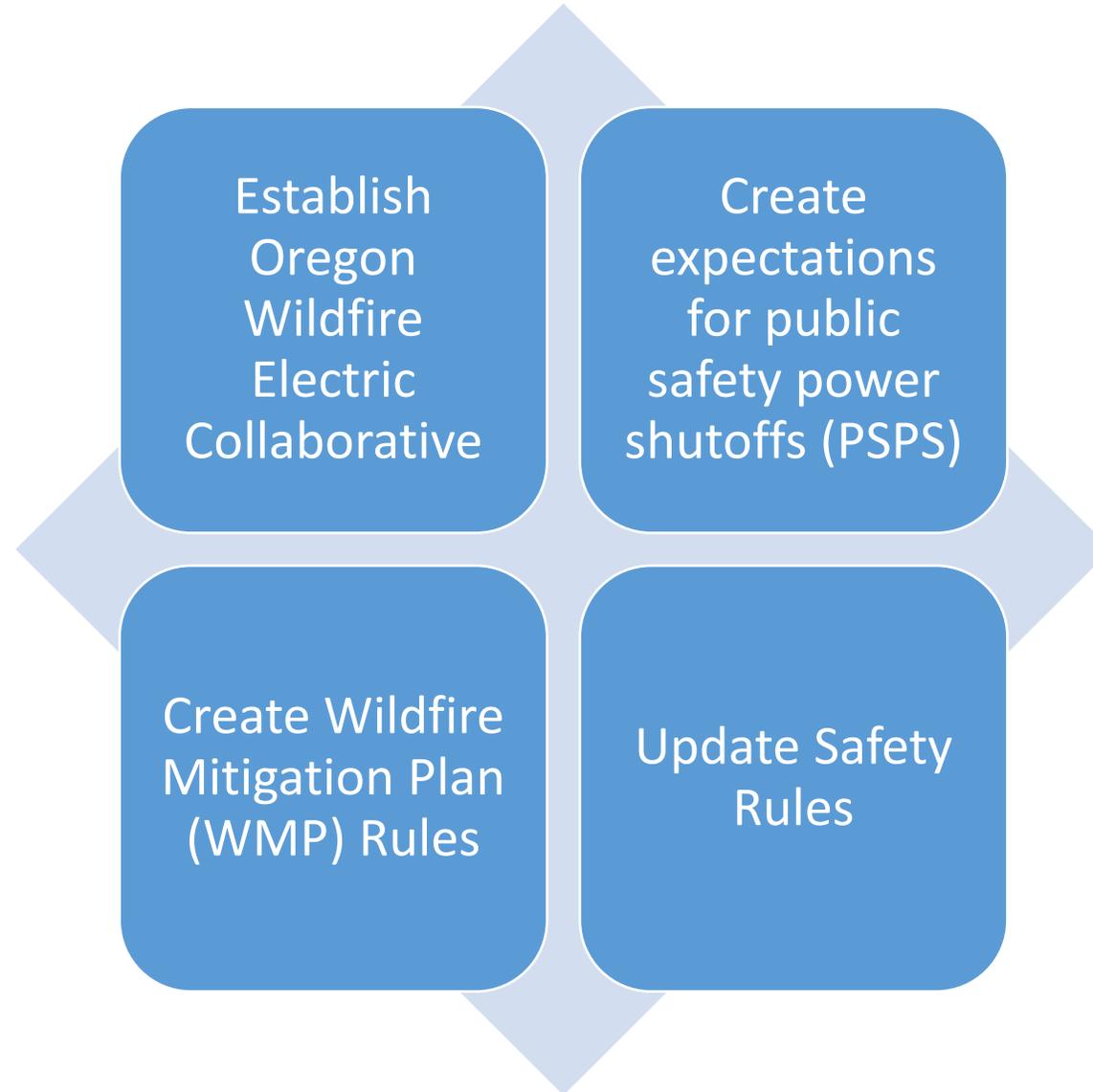
- First state outside of CA to direct utilities to bring wildfire mitigation plans to public meeting
- Hosted regional meeting on utility wildfire mitigation
- Early action to address community public safety power shutoff concerns



2020

- Second utility wildfire mitigation plan filings
- Launched Oregon Wildfire Electric Collaborative

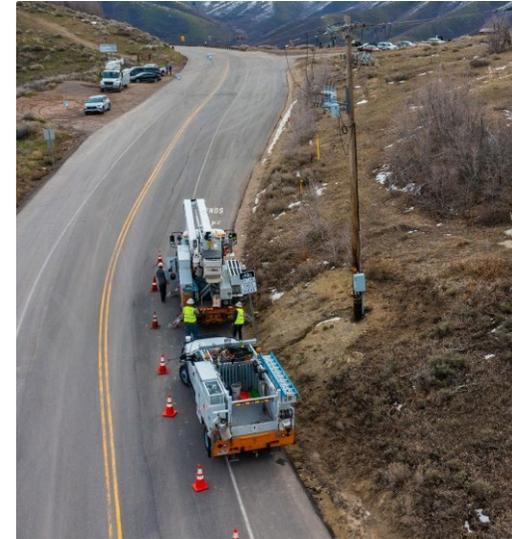
SB 762 (2021) Directives



Wildfire Mitigation Plans: Key Requirements

- Identify high-risk areas in service territory or rights-of-way
- Provide risk analysis and plans to prevent and mitigate wildfire risk
- Describe:
 - Plans for community engagement and collaborating with gov't agencies
 - Public Safety Power Shut-off (PSPS) protocols
 - Infrastructure inspection and vegetation management practices

Example Plan Elements



System hardening

<https://www.pacificorp.com/community/safety/wildfire-mitigation-plans.html>



Smarter fire detection

<https://portlandgeneral.com/outages-safety/safety/wildfire-safety-and-prevention>

Implementation Progress

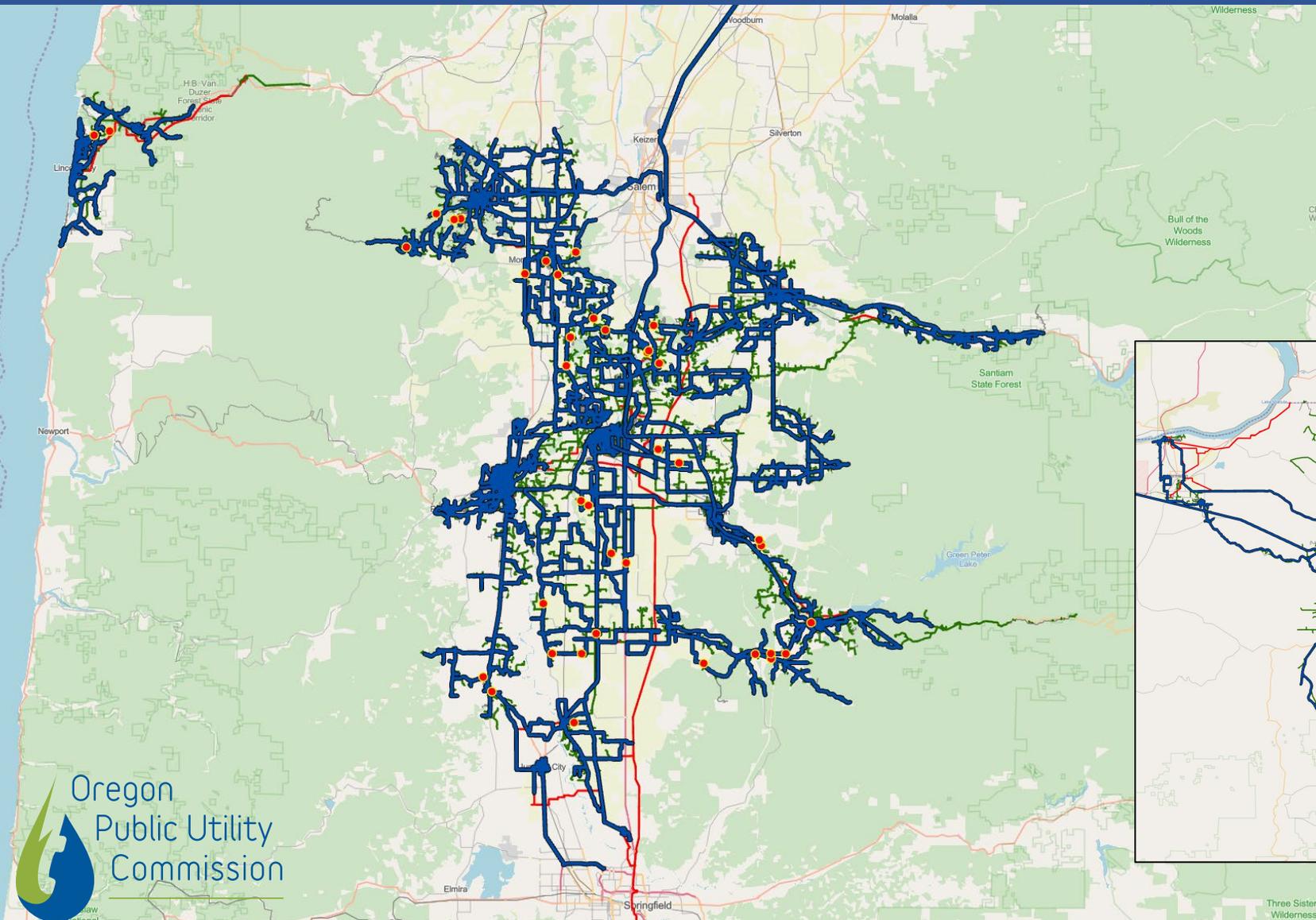
**Four annual IOU
Wildfire Mitigation
Plan cycles**
completed since SB
762 effective in
December 2021

**All COUs
completed Wildfire
Mitigation Plans**
(June 2022) and
continue to comply
with notification
requirements

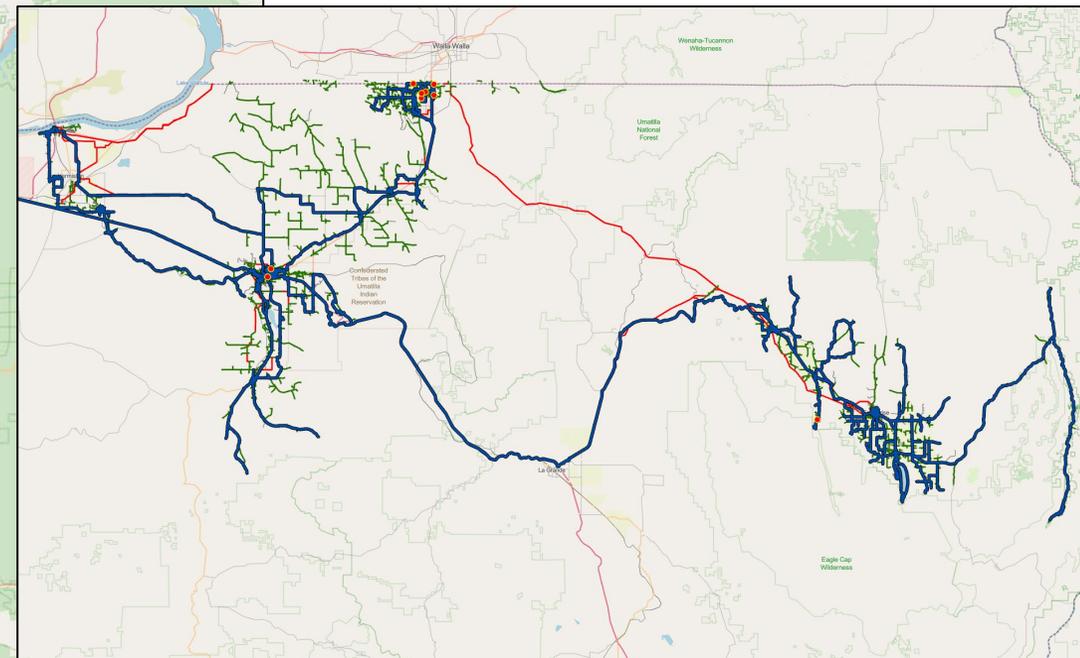
Audits completed
annually on **100%**
of line miles in
high fire risk zones

**PUC and
Independent
Evaluator review**

2024 PUC Audit of PacifiCorp Vegetation



- Overhead conductors in green
- Auditor tracks in blue
- Probable violations are red dots



Process Evolution and Improvements

2022: Formal Wildfire Mitigation Plans

Common plan structure

Community Engagement

Cost recovery mechanism

2024: WMP Improvement Phase 1

Transition to 3-year plans with interim updates

Develop consistent common format and data expectations

2025: WMP Improvement Phase 2

Create common risk quantification, mitigation & valuation methods

What we're learning

Highlights

- Utilities **improving outreach to customers and communities** with information on adapting to WMP implementation challenges
- **Improvement in vegetation clearances** over time; very few violations in HFRZ
- More frequent **coordination with public safety partners**, especially during periods of high risk

Opportunities

- **Costs** are high; current focus on quantifying risk reduced for the dollars spent to improve “risk-spend efficiency”
- **Challenges holding pole attachers* accountable** to standards (*telecommunication / broadband companies)
- **Science and risk** are changing very rapidly

Current Forecasts for Multiyear Spend

WMP Costs Actual & Planned \$Millions	PacifiCorp (thru 2028)*	PGE (thru 2027)	Idaho Power (thru 2027)	Total
O&M to date	\$60.2	\$97.2		\$157.4
Capital to date	\$60.3	\$58		\$118.3
O&M planned	\$195	\$163.9	\$1.8	\$360.7
Capital planned	\$780.8	\$235.3	\$4.9	\$1,021
Total	\$1,096.3	\$554.4	\$6.7	\$1,657.4
Cost Per High-Risk Line Mile	\$300,112	\$432,112	\$88,103	\$330,713
Cost per Customer	\$1,777	\$601	\$33	\$1,063

*costs from 2024-2028 Plan

Limitations of Utility Risk Mitigation

Full Utility Control

- Maintenance / Hardening
- Sensitive Settings / PSPS

Partial Utility Control

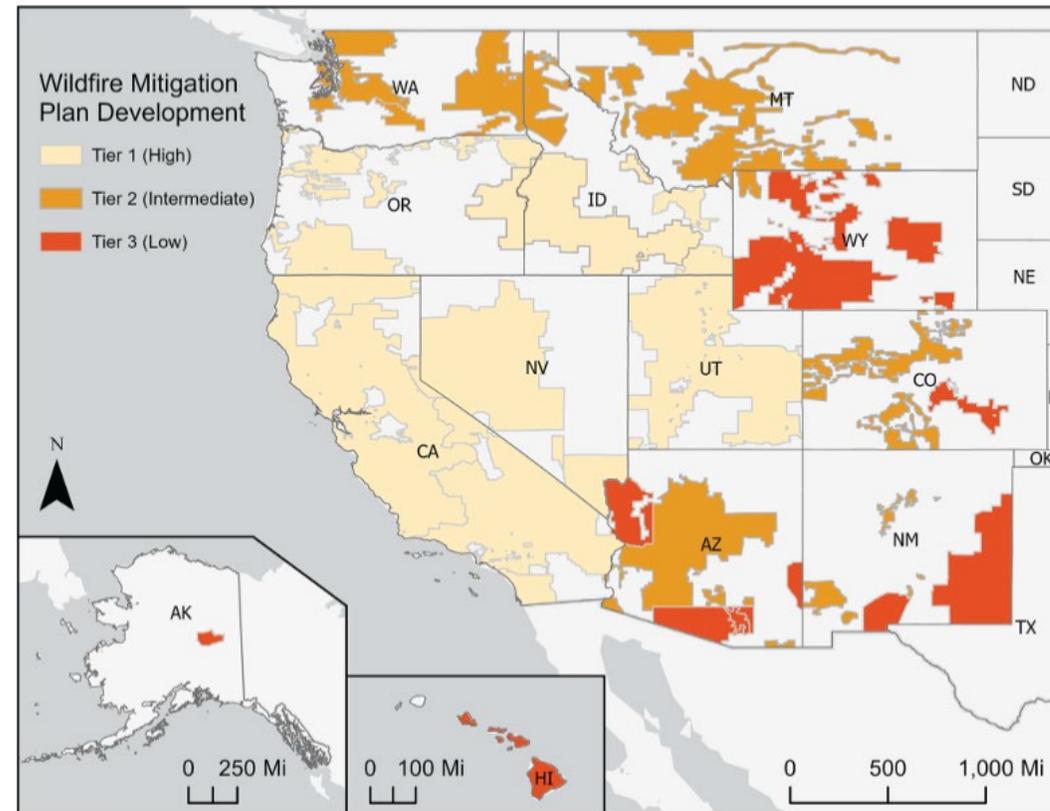
- Vegetation Management
- Wildfire Liability Insurance

No Utility Control

- Drought impacts
- Extreme weather
- Building codes
- Response capabilities

External Perspective on IOU Wildfire Maturity

Figure 3: Wildfire Mitigation Plan Development in Western Investor-Owned Electric Utilities Exposed to Wildfire Risk (Utility Service Territory)



Questions



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