

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**

Order Instituting Rulemaking to Examine Electric
Utility De-Energization of Power Lines in Dangerous
Conditions.

Rulemaking 18-12-005
(Filed December 13, 2018)

PACIFICORP'S PHASE 2 GUIDELINES

PROGRESS REPORT

Tim Clark
PacifiCorp d/b/a Pacific Power
1407 W. North Temple, Suite 320
Salt Lake City, Utah 84119
Telephone: 801-220-4565
Email: tim.clark@pacificorp.com

August 5, 2020

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PacifiCorp d/b/a Pacific Power (PacifiCorp or company) submits this Phase 2 Guidelines Progress Report consistent with Decision 20-05-051, Decision Adopting Phase 2 Updated and Additional Guidelines for De-Energization of Electrical Facilities to Mitigate Wildfire Risk (the "Phase 2 Decision"), and specifically paragraph No. 4 of the Order (Phase 2 Decision at 100).

I. Introduction

The Phase 2 Decision requires the submission of "two progress reports detailing progress towards implementation of the guidelines set forth in Appendix A" (Phase 2 Decision at 100). This Progress Report is the first of those two submissions and details PacifiCorp's progress in implementing the Phase 2 guidelines.

II. PacifiCorp Has Made Timely Progress to Implement the Phase 2 Guidelines.

PacifiCorp has implemented, or is in the process of currently implementing, the Phase 2 guidelines set forth in Appendix A to the Phase 2 Decision ("Appendix A"). Consistent with the structure in Appendix A; this Progress Report is organized by the following guideline subject areas: (A) wildfire advisory board; (B) de-energization exercises; (C) communication and notification plans; (D) community resource centers; (E) power restoration; (F) critical

infrastructure and resiliency; (G) access and functional needs (AFN) populations; and (H) transparency.

A. Wildfire Advisory Board

Consistent with subsection (a) of the Appendix, PacifiCorp has created a wildfire advisory board, which will advise on a range of wildfire matters including all aspects of PacifiCorp's public safety power shutoff (PSPS) plan. Members of the board representing PacifiCorp include: Allen Berreth, Director of Delivery Assurance; Heide Caswell, Director of Asset Performance and Wildfire Mitigation; Todd Andres, Regional Business Manager; Drew Hanson, Customer and Corporate Communications; and Jeff Bolton, Emergency Management. Members of the board representing local government and community organizations include: Heather Hadwick, Modoc County Emergency Services; Juliana Lucches, Mayor of Dunsmuir and City Planner for Mt. Shasta; Steve Baker, City Manager, Yreka; Jasen Vela, Deputy Director, Siskiyou County Emergency Services; Nancy Ogren, Supervisor Elect, Siskiyou County; Veronica Rivera, Director of Facilities, College of the Siskiyous; Ed Valenzuela, Supervisor, Mt. Shasta Region, Siskiyou County; Giselle Nova, Chair, Siskiyou County Fire Council; Paul Hamann, General Manager, Roseburg Forest Products. This broad group of members reflect key stakeholders,¹ including organizations and agencies holding a particular interest in how proactive de-energization might be implemented in PacifiCorp's service territory.

The wildfire advisory board is holding its first full meeting via teleconference in August, tentatively planned for August 13, 2020. At the meeting, PacifiCorp will present its PSPS plan, both refreshing members of the board who have participated in PSPS meetings and orientating

¹ See Appendix A at 2 ("These service territory-wide advisory boards should consist of public safety partners, communications and water service providers, local and tribal government officials, business groups, non-profits, representatives of people/communities with access and functional needs and vulnerable communities, and academic organizations.")

members less familiar with the details of PacifiCorp's PSPS plan. As discussed below, there was a table-top de-energization exercise in June 2020, and the company will report on that event. PacifiCorp representatives will present the specifics of the plans for community resource centers and the role of critical facilities, and the board members will discuss whether any updates or modifications to the current PSPS plan are warranted. PacifiCorp will also provide a summary of the system hardening efforts, completed, underway and planned, which the company is implementing as part of its efforts to minimize both the potential of a PSPS event and to mitigate the impact of a PSPS event if such is necessary. The initial focus of the advisory board will be to identify and implement best practices related to PSPS, as well as achieve greater coordination across the various agencies and stakeholders in PacifiCorp's communities, in the event de-energization does occur.

B. De-Energization Exercises

A table-top de-energization simulation exercise occurred on June 3, 2020. Multiple PacifiCorp personnel participated, including representatives in emergency management, transmission and distribution operations, communications, as well as the local regional business manager. The exercise was also attended by staff of the California Public Utilities Commission and representatives of the Wildfire Safety Division, CalFIRE, CalOES and Siskiyou County. There was positive feedback from stakeholders at the meeting, emphasizing the importance of this type of collaboration. PacifiCorp's next event is planned for the spring of 2021, and the company may, in consultation with the wildfire advisory board, expand the list of invitees.

C. Who Should Receive Notice, When Should Notice Occur, and How Should Notice Occur?

PacifiCorp's communication and notification plan has evolved over the past year and now integrates the latest requirements from the Phase 2 Guidelines to provide additional notice

of re-energization, as discussed in greater detail in subsection (e) below. PacifiCorp's communication and notification plan strives to use all reasonable channels of communication to effectively communicate notice of PSPS events to the public. The communication and notification plan has two primary systems. First, direct communications, through pre-identified channels, are used to provide detailed notices to key stakeholders, namely public safety partners and critical facilities and critical infrastructure. (See subsection (f) below for additional discussion.) Second, a series of automated notices, together with published information on the company's website and other outlets, are employed to provide notice to the general public at critical stages of the PSPS process, including for pre-event warnings, an actual event, and re-energization. Medical baseline and access and functional needs customers are provided additional notices. (See subsection (g) below for additional discussion.)

Through various discussions and participation in the table-top de-energization exercise described above, PacifiCorp has collaborated with representatives of Siskiyou County and CalOES regarding its communication and notification plan. Moving forward, PacifiCorp will solicit additional input on its communication and notification plan from the wildfire advisory board. PacifiCorp is also working to identify any concerns from independent living centers and representatives of people/communities with access and functional needs who are located in an area which may be subject to a PSPS event.

To ensure that the public is able to access precise information about both potential and actual PSPS events relevant to a particular location, PacifiCorp has modified its main PSPS webpage, available at www.pacificpower.net/psps. There is a tool allowing members of the public to enter their address into a search bar to determine whether such address is in an area which may be subject to a PSPS, and there is an additional tool for members of public to see the

“Public safety power shutoff forecasting” for that area over the following week. The status indicates whether the area is operating as “Normal,” whether there is a PSPS “Watch,” or whether there is an actual PSPS “Event”.

PacifiCorp has ensured that it has the bandwidth to manage its PSPS website, even under the extremely remote potential that all proactive de-energization zones in PacifiCorp’s service territory would be de-energized at the same time. PacifiCorp will consult with the California Department of Technology (CDT) to confirm CDT’s agreement that this capacity exists and submit such information to the CPUC in the company’s next Progress Report.

D. Community Resource Centers

PacifiCorp has a community resource center (CRC) plan, which may be updated after consultation with and review from the wildfire advisory board. Because of the relatively narrow geographic scope of PacifiCorp’s proactive de-energization zones and the broad stakeholder participation on the wildfire advisory board, input from the board is well-targeted to local conditions. In addition, PacifiCorp has consulted with senior citizen groups and public health and health care providers located within the areas where a proactive de-energization may occur, including Siskiyou County Emergency Management, Siskiyou County Public Health, Fairchild Medical Center and other associated clinics.

As set forth in the CRC plan, at each CRC between 8 AM and 10 PM, there will be device charging stations capable of powering medical devices; there will also be chairs, water, and restrooms available for use. PacifiCorp will work with telecommunications providers to ensure that cellular service is available.

In light of the current pandemic response, CRCs will be operated consistent with the most current federal Center for Disease Control, state and local public health authority guidelines

regarding the use of facial coverings, social distancing, population capacity, symptom screening, and cleaning and disinfection procedures.

E. Power Restoration

Power restoration is already a key component of PacifiCorp's overall PSPS plan, and PacifiCorp aims to restore power as quickly and efficiently as possible in the event a PSPS occurs. Consistent with its general approach and the guidelines in subsection (e) of the Phase 2 Guidelines Appendix, PacifiCorp has expressly integrated the requirement to complete restoration "as soon as possible and within 24 hours from the termination of the de-energization event, unless it is unsafe to do so."

PacifiCorp also addresses restoration in its communication and notice plans. If a PSPS event occurs, the company will send notice of re-energization immediately after re-energization occurs. Timing of actual re-energization is unknown until patrols are complete; thereafter, re-energization and notice should occur rapidly, and PacifiCorp anticipates that such notice would go out well within one hour. Prior to actual re-energization, PacifiCorp will make a decision to initiate the process for re-energization once the extreme wildfire conditions necessitating the PSPS have subsided. With respect to that decision-point, PacifiCorp will notify public safety partners and operators of critical facilities and critical infrastructure within one hour of knowing that patrols will be initiated with the intent to re-energize a line once the patrols are complete. PacifiCorp will thereafter send a notice to the public.

F. Critical Infrastructure and Resiliency

PacifiCorp has used its own customer information and further coordinated with local government agencies to identify the critical facilities in any of the company's proactive de-energization zones. PacifiCorp is working with appropriate governing bodies and has identified

critical facilities within each proactive de-energization zone to assess the impact of a potential PSPS event. The wildfire advisory board will place particular focus on critical facilities.

PacifiCorp is in the process of developing a pilot project to explore the feasibility of deploying mobile Electric Vehicle (EV) charging stations, including Level 3 fast charging, by the 2021 wildfire season. The company is in the process of engaging a consultant to help inform and properly design a pilot that best meets the unique needs of PacifiCorp's California service territory. This consultant will investigate and develop a list of potential mobile charging solutions, with a cost estimate and examination of deployment procedures, including an assessment of communication and infrastructure requirements. The areas identified as potential proactive de-energization zones in PacifiCorp's service territory center on two notably distinct geographical areas. The larger zone, involving the Interstate-5 (I-5) corridor through Dunsmuir, Mt. Shasta, and Weed, implicates denser and more developed transportation infrastructure. The smaller zone, near Happy Camp, is remarkably remote and rural, with very little existing EV use or charging capacity. The consultant will evaluate the use of mobile charging equipment during a de-energization event in both distinct geographic areas. Through this process the company will develop area-appropriate mobile charging pilots.

In coordination with EV charging network providers, namely Tesla and ChargePoint, PacifiCorp is evaluating options to reinforce EV charging networks and key charging locations with backup generation. The company has initiated discussions with EV charging network providers to gather information on their current resiliency efforts in the company's PSPS areas. The consultant hired by PacifiCorp will also provide plans on how to develop a resilient EV charging network as well as a plan to communicate the locations and availability of the chargers through the utility website and mobile application. As discussed above, different geographic

areas potentially subject to PSPS pose different challenges and opportunities, and the plan to develop a more resilient EV charging network will be specific to each area. The consultant will identify potential partnership opportunities between the utility, network providers or other organizations interested in expanding access to EV charging infrastructure. The consultant will also review current access to charging networks and current utilization rates, together with a forward-looking estimate of how potential resiliency projects and expanded charging access might impact future utilization rates. The consultant will also evaluate the potential for expanding access to charging for medium and heavy duty vehicles along the I-5 corridor as identified in the West Coast Clean Transit Corridor Initiative Final Report,² and the opportunity for including resilient charging for light duty vehicles at the same location(s). This review will provide the company critical information on how to cost effectively bring back-up power to critical EV charging infrastructure.

PacifiCorp has coordinated with EV network information providers to identify, to the extent possible, the current location, number and accessibility of all Level 3 (L3) and Level 2 (L2) charging stations within areas potentially subject to proactive de-energization in PacifiCorp’s service territory. The list is as follows:

Station	Street	Provider	Access	# of L2	# of L3
DC Corridor	1844 Shastina Dr, Weed	Charge Point	24 hour	2	2
Mount Shasta Shopping Center - Tesla Supercharger	134 Morgan Way, Mt. Shasta	Tesla	24 hour; Tesla only		16
Best Western Plus Treehouse Mt. Shasta - Tesla Supercharger	111 Morgan Way, Mt. Shasta	Tesla	24 hour; Tesla only		4
Mercy Medical Center	914 Pine St, Mt. Shasta	Charge Point	24 hour	4	
Shasta Inn - Tesla Destination	1121 Mt. Shasta Blvd, Mt. Shasta	Tesla	24 hour; Tesla only	4	
DC Corridor	111 Morgan Way, Mt. Shasta	Charge Point	24 hour	2	2

² West Coast Clean Transit Corridor Initiative: Interstate 5 Corridor Final Report, June 2020 Available at: <https://westcoastcleantransit.com/>

Dunsmuir Lodge - Tesla Destination	6604 Dunsmuir Ave, Dunsmuir	Tesla	24 hour; Tesla only	2	
DC Corridor	4917 Dunsmuir Ave, Dunsmuir	Charge Point	24 hour	2	2
Yaks on the 5	4314 Pioneer Way, Dunsmuir	Charge Point	24 hour		1

As part of its general efforts to coordinate with critical facilities, the company is developing protocols with the EV charging network providers to execute timely notification of potential de-energization events. Initial discussions with EV charging network providers suggest that those providers are eager to develop streamlined processes for delivering accurate charging availability information to their users. The company plans to review the communication channels being developed between other utilities and the network providers to develop an effective and appropriately designed communication strategy.

In addition to the EV-related efforts outlined above, in July 2020, PacifiCorp launched two additional community resiliency programs aimed at supporting vulnerable community members and critical facilities at high risk of exposure to wildfire, PSPS events or other natural disasters. The first program is an Energy Storage Program which would fund technical feasibility studies and/or the capital costs to enable to installation of battery storage or other back-up generation systems at facilities offering critical services during emergencies such as PSPS events. Facilities eligible for this program must be non-residential and meet the definition of critical facilities, as defined by the Commission in Decision 19-09-027, later modified in Decision 20-01-021 for the Self Generation Incentive Program. The second program offered by PacifiCorp is a Portable (Renewable) Generator program which would provide grants to emergency responders within higher risk regions such as PSPS areas to enable the purchase of portable renewable-powered generation which can be offered to customers with medical, access and functional needs. The first round of applications for these program are currently being

accepted through November 2020. More information about these community resiliency programs is available at <https://www.pacificpower.net/community/community-resiliency.html>.

G. Medical Baseline and Access and Functional Needs Populations

PacifiCorp provides additional PSPS notifications to individuals classified as medical baseline customers in PacifiCorp's customer service system and to individuals who self-identify as having access and functional needs. PacifiCorp provided substantial outreach on the mechanisms by which customers can self-identify as persons with access and functional needs. PacifiCorp's presentation to the Wildfire Safety Division in May of 2020 addressed these efforts.³

H. Transparency

PacifiCorp is dedicated to the principle of transparency and strives to provide customers with usable and understandable information about their electric service. In addition to the PSPS websites referenced in Section (c) of this Progress Report, PacifiCorp's website has a section devoted to the topic of wildfire mitigation; the main web page is available at <https://www.pacificpower.net/outages-safety/wildfire-safety.html>. There is a link on the wildfire mitigation main page to a secondary page titled, "What we're doing to reduce wildfire risks," available at <https://www.pacificpower.net/outages-safety/wildfire-safety/reducing-risks.html>. As PacifiCorp's wildfire mitigation programs continue to mature and evolve, so does the content on these webpages. PacifiCorp is in the process of developing additional content to further explain the work the company is doing to mitigate the need for de-energization events.

³ Materials from that presentation are available at: https://www.pacificpower.net/content/dam/pcorp/documents/en/pacificpower/outages-safety/wildfire-safety/PacifiCorp_WMP_PSPS_Briefing_May2020_Final.pdf

III. Conclusion

In 2019, PacifiCorp did not have a PSPS event. In 2020, PacifiCorp will make every attempt to avoid use of this strategy of last resort. If a PSPS is warranted, PacifiCorp will effectively communicate with customers and work with local government officials to minimize the impact to its customers and communities, consistent with all the Guidelines identified in R.18-12-005, including those in the Phase 2 Guidelines.

Respectfully submitted,

/s/ Tim Clark

Tim Clark
Senior Attorney
PacifiCorp d/b/a Pacific Power
1407 W. North Temple, Suite 320
Salt Lake City, Utah 84119
Telephone: 801-220-4565
Email: tim.clark@pacificorp.com

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