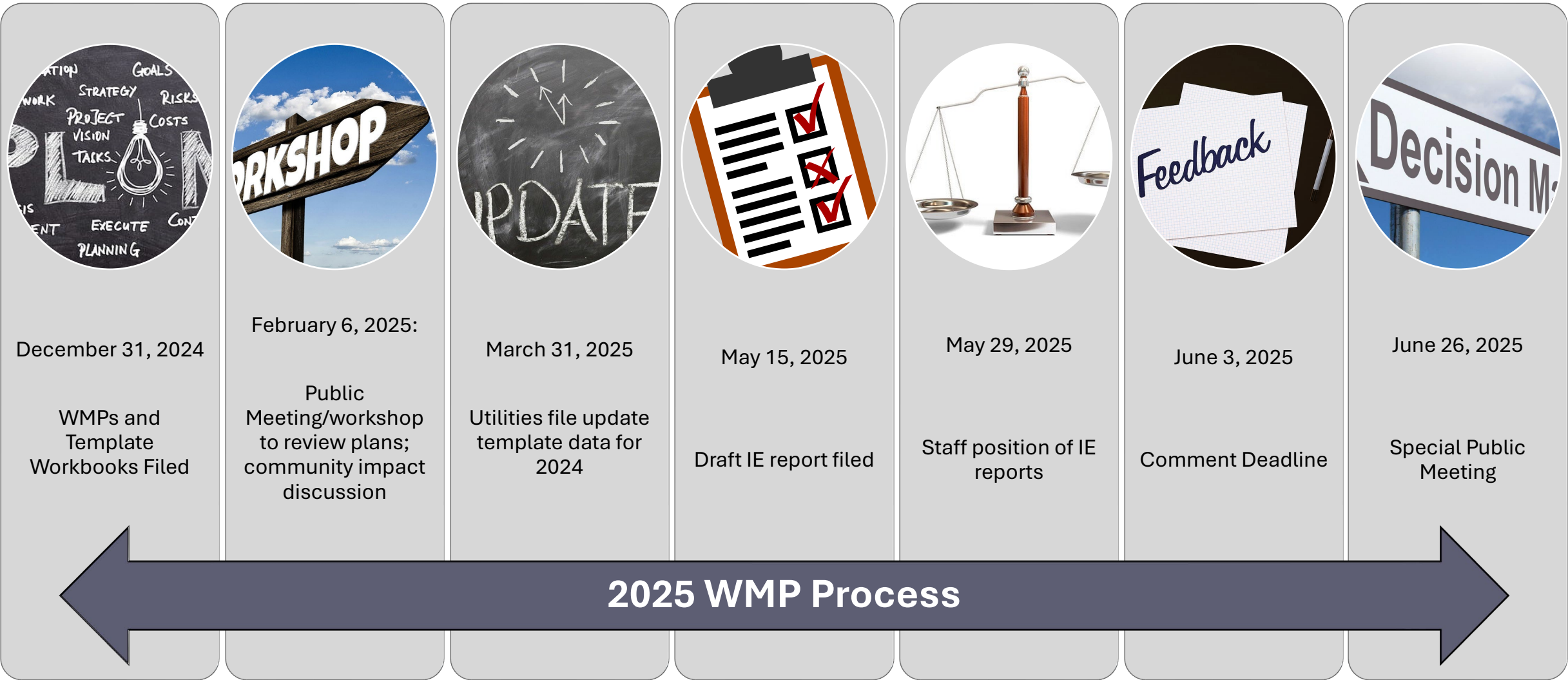


Wildfire Mitigation Plan Review 2025



2025 WMP Process



WMP Review Process

1. PUC/IE Review Plans and Supporting Documentation
 - This year augmented with Data Template Workbooks
 - Additional information requests were initiated to support understanding of plans or template data
2. IE Compare Plans and Supporting Documentation Against Regulations for Met/Partially Met
3. IE Compare Plans and Supporting Documentation Against Ordered Recommendations to determine level of Achievement
4. Staff Reviews IE Recommendations and Comments
5. Staff Recommends Certain Actions and Timing

IE Recommendations by Topic and Utility

Independent Evaluator Recommendations			
Topic	PAC	PGE	IPC
Communication Effectiveness	2	5	5
Community Resilience Support	3	2	5
Cost Benefit Assessment/Mitigation Effectiveness	11	6	8
Ignition Risk Quantification	5	8	5
Initiative Tracking	4	2	1
Operational Strategies Impacting Reliability	1		
Program Administration and Plan Transparency	11	10	7
Program Maturity	4	6	4
Public Safety Partner Coordination	5		
Risk Quantification	4	5	4
Risk Ranking	2		
Total	52	44	39

Comments Received

Stakeholder comments included:

- More time needed for comments
- Need for streamlined and enhanced plans
- Alignment/leveraging other planning activities
- Balancing investments between utility infrastructure and community resilience
- Details to help understand how granular determinations were made (specific risk estimations)
- Consider better support for most vulnerable customers
- For multistate operations, granularity at the state level
- More information explaining how fire risks are quantified
- IE input very important
- Consider use of technology to deliver long term benefits for customers

Utility comments included:

- Concerns about number of recommendations and how best to integrate them into plans
- Believes certain recommendations should be part of rulemaking
- Believes certain items are best led by Staff
- Appreciates acknowledgement of advances

Staff Approach to Recommendations

1. Some of the joint recommendations are implementing work currently being created in UM 2340 into the next cycle of plans
 - Product should be integrated into 2026-2028 WMP
 - Product should be integrated into 2027 Plan Update
2. Specific recommendation for a particular IOU

Continued WMP Maturation

Takeaways that are part of the ongoing advancement of Plans

Staff Recommendations: Timing, Topic and Code Requirements

Addressed In Utility Specific WMP Docket	Detailed In	Final Recommendation ID	Topic	Timing	Code Requirement
2026-2028 MYP	Attachment B	ALL_2502	Program Maturity	2026 WMP	Maturity Model
2026-2028 MYP	Attachment B	ALL_2503	Program Administration and Plan Transparency	2026 WMP	OAR 860-300-0020 (1)(i)
2026-2028 MYP	Attachment B	ALL_2504	Ignition Risk Quantification	2026 WMP	OAR 860-300-0020 (1)(b)
2026-2028 MYP	Attachment B	ALL_2507	Program Administration and Plan Transparency	2026 WMP	OAR 860-300-0020 (1)(b)
2026-2028 MYP	Attachment B	ALL_2508	Program Administration and Plan Transparency	2026 WMP	OAR 860-300-0020 (1)(i)
2026-2028 MYP	Attachment B	ALL_2509	Initiative Tracking	2026 WMP	OAR 860-300-0020 (1)(c)
2026-2028 MYP	Attachment B	ALL_2510	Program Administration and Plan Transparency	2026 WMP	OAR 860-300-0020 (1)(c)
2026-2028 MYP	Attachment B	ALL_2511	Communication Effectiveness	2026 WMP	OAR 860-300-0020 (1)(d)
2026-2028 MYP	Attachment B	ALL_2512	Community Resilience Support	2026 WMP	OAR 860-300-0020 (1)(e)
2026-2028 MYP	Attachment B	ALL_2501	Program Administration and Plan Transparency	2027 WMP	OAR 860-300-0020 (1)(i)
2026-2028 MYP	Attachment B	ALL_2505	Ignition Risk Quantification	2027 WMP	OAR 860-300-0020 (1)(b)
2026-2028 MYP	Attachment B	ALL_2506	Program Administration and Plan Transparency	2027 WMP	OAR 860-300-0020 (1)(b)
2026-2028 MYP	Attachment B	ALL_2513	Program Administration and Plan Transparency	2027 WMP	OAR 860-300-0020 (1)(g)
2026-2028 MYP	Attachment B	ALL_2514	Program Maturity	2027 WMP	OAR 860-300-0020 (1)(j)

Addressed In UM 2340	Detailed In	ID	Topic	Timing	Code Requirement
UM2340	Attachment C	UM2340_2501	Program Administration and Plan Transparency	2026 WMP	OAR 860-300-0020 (1)(a)(A)+(B)
UM2340	Attachment C	UM2340_2502	Cost Benefit Assessment/Mitigation Effectiveness	2026 WMP	OAR 860-300-0020 (1)(b)
UM2340	Attachment C	UM2340_2503	Risk Quantification	2026 WMP	OAR 860-300-0020 (1)(b)
UM2340	Attachment C	UM2340_2504	Cost Benefit Assessment/Mitigation Effectiveness	2026 WMP	OAR 860-300-0020 (1)(b)
UM2340	Attachment C	UM2340_2505	Public Safety Partner Coordination	2026 WMP	OAR 860-300-0020 (1)(d)
UM2340 (Future Topic)	Attachment C	UM2340_2506 (Future Topic)	Risk Quantification	2027 WMP	OAR 860-300-0020 (1)(e)
UM2340 (Future Topic)	Attachment C	UM2340_2507 (Future Topic)	Cost Benefit Assessment/Mitigation Effectiveness	2027 WMP	OAR 860-300-0020 (1)(g)
UM2340 (Future Topic)	Attachment C	UM2340_2508 (Future Topic)	Cost Benefit Assessment/Mitigation Effectiveness	2027 WMP	OAR 860-300-0020 (1)(h)
UM2340 (Future Topic)	Attachment C	UM2340_2509 (Future Topic)	Community Resilience Support	2027 WMP	OAR 860-300-0020 (1)(h)
UM2340 (Future Topic)	Attachment C	UM2340_2510 (Future Topic)	Program Maturity	2027 WMP	OAR 860-300-0020 (1)(j)
UM2340 (Future Topic)	Attachment C	UM2340_2511 (Future Topic)	Ignition Risk Quantification	2027 WMP	OAR 860-300-0020 (1)(k)

Data Template Costs

Data Template Costs		Recurring Data Management Cost versus 2025 Forecast
IE Summary of Data Template Feedback from Utilities	Pacific Power states that it filled out data tables to the best of its ability, but Pacific Power describes challenges and offers solutions for the OPUC's consideration in Section 7 of its 2025 WMP Update. Pacific Power estimates that it would cost anywhere from \$80k to \$350k to develop its capabilities to respond to the data templates in their current form. Pacific Power states that it intends to include an initiative related to implementation reporting processes in its 2026 WMP. The IE suspects that Pacific Power's anticipated expenditures are lower than other utilities in Oregon in part because Pacific Power has been engaged in data reporting in California since 2020.	0.0027%
	PGE submitted its data tables along with substantial clarifications and descriptions of upgrades necessary to complete the tables in Section 7 of its 2025 WMP Update. PGE notes that it does not have a centralized, consolidated library that contains all data necessary to complete the submittal and that it had to query 15 distinct systems of record. PGE states that it is undertaking an evaluation process to refine data focusing first on data critical to wildfire risk modeling, evaluation of mitigation effectiveness, and non-wildfire grid investment decision. PGE states that it is tracking costs associated with compiling the data tables under a new initiative WMSD-02, WMP Data Template Workbook. PGE describes the improvements it is taking and that are needed, along with rough estimated costs, to fully complete the data tables, including business process improvements, technology updates, automation, data integration and new systems of record. Estimated costs for automation are \$150k-\$350k one-time costs along with \$60k-\$135k ongoing costs. Estimated costs for data integration are \$200k-\$500k one-time costs along with \$35k-\$90k ongoing costs. Estimated costs for new systems of record are \$200-\$450k in one-time costs plus \$60k-\$135k in ongoing costs.	0.0081%
	Idaho Power, in its March 31, 2025, Updated Data Tables submission, states that it undertook its best efforts to provide the requested information based on how it currently maintains and collects the current data. Idaho Power estimates ongoing and additional costs of approximately \$700k over three years (2025 - 2027) that would be required to complete that data tables.	0.6704%
Staff Summary	While each of the utilities identified additional costs to provide the data templates, their recurring cost estimates range from .0027% - .67% of annual spend. Staff believes the value received in analysis warrants such relatively low additional costs. In addition, Staff believes that the utilities will benefit in better informed decisions, thus co-benefits of this investment are anticipated. And more broadly, if consistency is established for wider use (i.e. western US), further value is expected to be delivered.	



Each of the utilities identified additional costs to provide the data templates, with the recurring costs estimated between 0.003%-.67% of the annual WMP spend; Staff believes the value received warrants this relatively low additional cost and believes the IOUs will benefit in better informed decisions, as well as give them and stakeholders better information to gauge specific choices being made.

Staff Conclusions

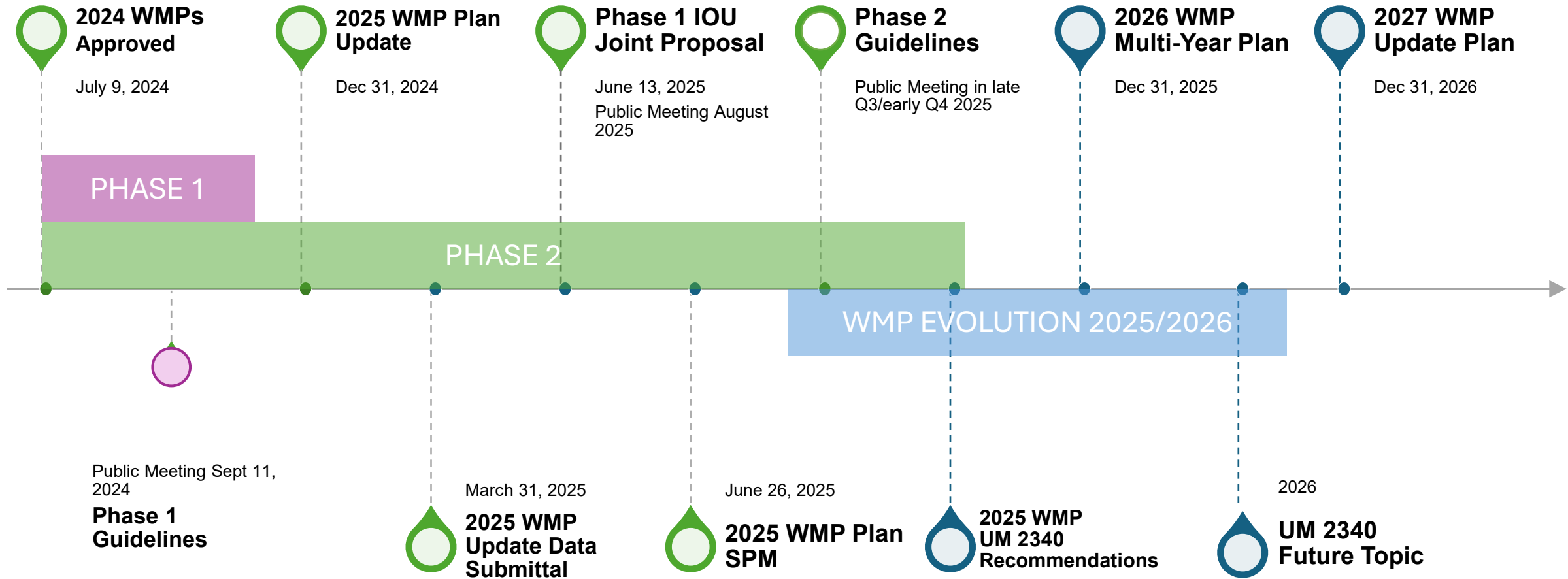
1. Progress has been made by all utilities
 - both in the WMPs
 - the delivery of the data template workbooks
2. Concurrently, utilities and Staff have made progress in UM2340, including
 - Phase 1 Guidelines adopted (last year)
 - Community outreach strategies and learnings reviewed as part of proceeding,
 - Investigation underway to create structured expectations for risk quantification, valuation, and risk reduction cost effectiveness
3. WMP maturation efforts in UM 2340 continue to be warranted. Collaboration has potential to create efficiencies for utilities, regulators, stakeholders.

Continued WMP Maturation

Staff Priorities for 2026-2028 Multi-Year Plans

1. Continued refinement of standard data, including working toward GIS data to support WMP activities at a more detailed level
2. Development/implementation of UM2340 risk valuation (i.e. RSE) and the supporting calculations for
 - Capital decisions: reconductoring projects, including covered conductor (tree wire or spacer cable) as well as underground conversions
 - O&M decisions: vegetation management program elements and their benefits (short and long term)
3. Continued collaboration to develop aligned approaches for plan evolution supporting transparency for stakeholder and regulator evaluations

Proposed Recommendation Timeline



UM 2207: Pacific Power Wildfire Mitigation Plan

Pacific Power - IE Assessment of 2024 Plans/2025 Update Compliance with Regulations

Administrative Rule Compliance: IE Report Appendix A			
Code	Requirement	2024 WMP Assessment of Compliance (Met/Partially Met/Did Not Meet)	2025 WMP Update Assessment of Compliance (Met/Partially Met/Did Not Meet)
OAR 860-300-0020 (1)(a)(A)+(B)	Identified areas that are subject to a heightened risk of wildfire, including determinations for such conclusions, and are: (A) Within the service territory of the Public Utility, and; (B) Outside the service territory of the Public Utility but within the Public Utility's right-of-way for generation and transmission assets	Met	Met (unchanged)
OAR 860-300-0020 (1)(b)	Identified means of mitigating wildfire risk that reflects a reasonable balancing of mitigation costs with the resulting reduction of wildfire risk	Met	Met (unchanged)
OAR 860-300-0020 (1)(c)	Identified preventative actions and programs that the utility will carry out to minimize the risk of the utility's facilities causing wildfire	Met	Met (unchanged)
OAR 860-300-0020 (1)(d)	Discussion of the outreach efforts to regional, state, and local entities, including municipalities, regarding a protocol for the de-energization of power lines and adjusting power system operations to mitigate wildfires, promote the safety of the public and first responders, and preserve health and communication infrastructure	Met	Met (unchanged)
OAR 860-300-0020 (1)(e)	Identified protocol for the de-energization of power lines and adjusting of power system operation to mitigate wildfires, promote the safety of the public and first responders, and preserve health and communication infrastructure, including a PSPS communication strategy consistent with OAR 860-300-040 through 860-300-050	Met	Met (unchanged)
OAR 860-300-0020 (1)(f)	Identification of the community outreach and public awareness efforts that the utility will use before, during, and after a wildfire season, consistent with OAR 860-300-040 through 860-300-050	Met	Met (unchanged)
OAR 860-300-0020 (1)(g)	Description of the procedures, standards, and timeframes that utilities will use to inspect utility infrastructure in areas it has identified as heightened risk of wildfire, consistent with OAR 860-024-0018	Met	Met (unchanged)
OAR 860-300-0020 (1)(h)	Description of the procedures, standards, and timeframes that the utility will use to carry out vegetation management in areas it has identified as heightened risk of wildfire, consistent with OAR 860-024-018	Met	Met (unchanged)
OAR 860-300-0020 (1)(i)	Identification of the development, implementation, and administrative costs for the Plan, which includes discussion of risk-based cost and benefit analysis, and considerations of technologies that offer co-benefits to the utility's system	Partially Met	Partially Met (unchanged)
OAR 860-300-0020 (1)(j)	Description of participation in national and international forums, including workshops identified in section 2, chapter 592, Oregon Law 2021, as well as research and analysis the utility has undertaken to maintain expertise in leading-edge technologies and operational	Met	Met (unchanged)
OAR 860-300-0020 (1)(k)	Description of ignition inspection programs, as described in Division 24 of these rules, including how the utility will determine and instruct its inspectors to determine conditions that could pose an ignition risk on its own equipment and pole attachments	Partially Met	Partially Met (unchanged)

Pacific Power - Assessment of 2024 Plan Recommendations

Pacific Power Progress Against Staff Recommendations (Order 24-230)			
OPUC ID Number	Description	IE Conclusion: Met/Partially Met/Did Not Meet/Not Due	OPUC Staff Conclusion: Met/Partially Met/Did Not Meet/Not Due
1	Climate Change Impacts	Met	Met
2	Data vs. Subject Matter Expert Decision-Making	Partially Met	Partially Met
3	Composite Risk Scores	Partially Met	Partially Met
4	Ignition Risk Driver Investigations	Did Not Meet	Partially Met (Phase 2)
5	Short-Term Fuels/Plan Modification	Did Not Meet	Partially Met (Phase 2)
6	Statewide Circuit List/Risk Reduction	Not Due Until 2026	Not Due Until 2026
7	Grants	Partially Met	Partially Met
8	CFCIs	Met	Met
9	Public Safety Partners	Partially Met	Partially Met
10	CBOs	Partially Met	Partially Met
11	Outreach Effectiveness	Met	Met
12	Power Restoration	Met	Met
13	Battery Rebate Program	Met	Met
14	CBOs/Vulnerable Populations	Partially Met	Partially Met
15	Inspection and Correction Analytics	Not Due Until 2026	Not Due Until 2026
16	Assessment of Vegetation Actions and Timing	Did Not Meet	Partially Met (Info Request)
17	Engage as Outlined on Joint Recommendations K and L	Not Due Until 2026	Not Due Until 2026

UM 2207 Recommendations

Recommendations Specific to Pacific Power

PP_2501: Pacific Power should outline how it plans to incorporate future land use and climate changes in order to demonstrate the Company's long-term plans align with the future state for those areas. Since such work is required in California, Staff believes there may be existing processes or approaches taken that could be explored by the Company and shared within the WMP.

PP_2502: Pacific Power should provide wildfire risk scores (both RAVE and RAIL) for its circuit segments or zones of protection calculations for wind-driven and terrain/fuel driven risk awareness.

PP_2503: Pacific Power should justify its use of vendor project management to reduce costs to deliver covered conductor projects. It should also provide details comparing its forecast construction costs by cost elements, including project management costs. It should compare its forecast cost elements against historic cost elements for covered conductor construction (distinguishing between traditional crossarm and spacer cable projects).

- Approve Pacific Power's 2025 Wildfire Mitigation Plan Update and adopt Staff's recommendations, in attachment B, as areas for additional improvement for Pacific Power.

UM 2208: Portland General Electric Wildfire Mitigation Plan

Portland General Electric - IE Assessment of 2024 Plans/2025 Update Compliance with Regulations

Administrative Rule Compliance: IE Report Appendix A			
Code	Requirement	2024 WMP Assessment of Compliance (Met/Partially Met/Did Not Meet)	2025 WMP Update Assessment of Compliance (Met/Partially Met/Did Not Meet)
OAR 860-300-0020 (1)(a)(A)+(B)	Identified areas that are subject to a heightened risk of wildfire, including determinations for such conclusions, and are: (A) Within the service territory of the Public Utility, and; (B) Outside the service territory of the Public Utility but within the Public Utility's right-of-way for generation and transmission assets	Met	Met (unchanged)
OAR 860-300-0020 (1)(b)	Identified means of mitigating wildfire risk that reflects a reasonable balancing of mitigation costs with the resulting reduction of wildfire risk	Partially Met	Met
OAR 860-300-0020 (1)(c)	Identified preventative actions and programs that the utility will carry out to minimize the risk of the utility's facilities causing wildfire	Met	Met (unchanged)
OAR 860-300-0020 (1)(d)	Discussion of the outreach efforts to regional, state, and local entities, including municipalities, regarding a protocol for the de-energization of power lines and adjusting power system operations to mitigate wildfires, promote the safety of the public and first responders, and preserve health and communication infrastructure	Met	Met (unchanged)
OAR 860-300-0020 (1)(e)	Identified protocol for the de-energization of power lines and adjusting of power system operation to mitigate wildfires, promote the safety of the public and first responders, and preserve health and communication infrastructure, including a PSPS communication strategy consistent with OAR 860-300-040 through 860-300-050	Met	Met (unchanged)
OAR 860-300-0020 (1)(f)	Identification of the community outreach and public awareness efforts that the utility will use before, during, and after a wildfire season, consistent with OAR 860-300-040 through 860-300-050	Met	Met (unchanged)
OAR 860-300-0020 (1)(g)	Description of the procedures, standards, and timeframes that utilities will use to inspect utility infrastructure in areas it has identified as heightened risk of wildfire, consistent with OAR 860-024-0018	Met	Met (unchanged)
OAR 860-300-0020 (1)(h)	Description of the procedures, standards, and timeframes that the utility will use to carry out vegetation management in areas it has identified as heightened risk of wildfire, consistent with OAR 860-024-018	Met	Met (unchanged)
OAR 860-300-0020 (1)(i)	Identification of the development, implementation, and administrative costs for the Plan, which includes discussion of risk-based cost and benefit analysis, and considerations of technologies that offer co-benefits to the utility's system	Partially Met	Partially Met (unchanged)
OAR 860-300-0020 (1)(j)	Description of participation in national and international forums, including workshops identified in section 2, chapter 592, Oregon Law 2021, as well as research and analysis the utility has undertaken to maintain expertise in leading-edge technologies and operational	Partially Met	Partially Met (unchanged)
OAR 860-300-0020 (1)(k)	Description of ignition inspection programs, as described in Division 24 of these rules, including how the utility will determine and instruct its inspectors to determine conditions that could pose an ignition risk on its own equipment and pole attachments	Met	Met

Portland General Electric - Assessment of 2024 Recommendations

Portland General Electric Progress Against Staff Recommendations (Order 24-232)			
OPUC ID Number	Description	IE Conclusion: Met/Partially Met/Did Not Meet/Not Due	OPUC Staff Conclusion: Met/Partially Met/Did Not Meet/Not Due
1	Risk Modeling Aspects	Met, but Not Due Until 2026	Met, but Not Due Until 2026
2	Risk Modeling Modifications	Met	Met
3	Climate Change and Fire Risk Modeling	Met	Partially Met
4	Risk Ranking	Met, but Not Due Until 2026	Partially Met
5	Expenses for Mitigation Measures	Partially Met	Partially Met
6	Annual Spending by Mitigation Tactic	Met	Met
7	Feedback on Outreach and Engagement	Met, but Not Due Until 2026	Met, but Not Due Until 2026
8	Type and Frequency of PSP Interactions	Met	Met
9	PSP Interactions with Public Entities	Met	Met
10	PSPS Communication	Met	Met
11	CBO Support for PSPS	Partially Met	Met
12	Battery Rebate Program	Met	Met
13	Customer Outreach Metrics	Partially Met	Met (Info Request)
14	Survey Results by HFRZ Designation	Met	Met
15	Ignition Prevention Inspection Update	Met	Met
16	Inspect and Correct Frequency in HFRZs	Met	Met
17	Timing of Inspections and Corrections	Partially Met	Partially Met
18	Vegetation Management Risk Buy-Down	Met	Met
19	Effectiveness of Vegetation Management	Not Due Until 2026	Met, but Not Due Until 2026
20	IWRMC Results	Met	Met
21	Advancing Technology Maturity	Not Due Until 2026	Not Due Until 2026
22	Outage and Ignition Root Cause Analysis	Met	Met
23	Inspection Program Effectiveness	Partially Met	Partially Met
24	Align Inspection and Root Cause Analysis with Peers	Not Due Until 2026	Not Due Until 2026

UM 2208 Recommendations

Recommendations Specific to Portland General Electric

PGE_2501: PGE should explain how it has addressed outage data quality, including its use of limited record set (only six years) and reduced set of outage records (only including vegetation and equipment failure categories). PGE should also explain how it plans to transition reporting consistent with IEEE 1782 without post-processing of outage data.

- Approve Portland General Electric's 2025 Wildfire Mitigation Plan Update and adopt Staff's recommendations, in attachment B, as areas for additional improvement for Portland General Electric.

UM 2209: Idaho Power Wildfire Mitigation Plan

Idaho Power IE Assessment of 2024 Plans/2025 Update Compliance with Regulations

Administrative Rule Compliance: IE Report Appendix A			
Code	Requirement	2024 WMP Assessment of Compliance (Met/Partially Met/Did Not Meet)	2025 WMP Update Assessment of Compliance (Met/Partially Met/Did Not Meet)
OAR 860-300-0020 (1)(a)(A)+(B)	Identified areas that are subject to a heightened risk of wildfire, including determinations for such conclusions, and are: (A) Within the service territory of the Public Utility, and; (B) Outside the service territory of the Public Utility but within the Public Utility's right-of-way for generation and transmission assets	Met	Met (unchanged)
OAR 860-300-0020 (1)(b)	Identified means of mitigating wildfire risk that reflects a reasonable balancing of mitigation costs with the resulting reduction of wildfire risk	Partially Met	Partially Met (unchanged)
OAR 860-300-0020 (1)(c)	Identified preventative actions and programs that the utility will carry out to minimize the risk of the utility's facilities causing wildfire	Met	Met (unchanged)
OAR 860-300-0020 (1)(d)	Discussion of the outreach efforts to regional, state, and local entities, including municipalities, regarding a protocol for the de-energization of power lines and adjusting power system operations to mitigate wildfires, promote the safety of the public and first responders, and preserve health and communication infrastructure	Met	Met (unchanged)
OAR 860-300-0020 (1)(e)	Identified protocol for the de-energization of power lines and adjusting of power system operation to mitigate wildfires, promote the safety of the public and first responders, and preserve health and communication infrastructure, including a PSPS communication strategy consistent with OAR 860-300-040 through 860-300-050	Met	Met (unchanged)
OAR 860-300-0020 (1)(f)	Identification of the community outreach and public awareness efforts that the utility will use before, during, and after a wildfire season, consistent with OAR 860-300-040 through 860-300-050	Met	Met (unchanged)
OAR 860-300-0020 (1)(g)	Description of the procedures, standards, and timeframes that utilities will use to inspect utility infrastructure in areas it has identified as heightened risk of wildfire, consistent with OAR 860-024-0018	Met	Met (unchanged)
OAR 860-300-0020 (1)(h)	Description of the procedures, standards, and timeframes that the utility will use to carry out vegetation management in areas it has identified as heightened risk of wildfire, consistent with OAR 860-024-018	Met	Met (unchanged)
OAR 860-300-0020 (1)(i)	Identification of the development, implementation, and administrative costs for the Plan, which includes discussion of risk-based cost and benefit analysis, and considerations of technologies that offer co-benefits to the utility's system	Partially Met	Partially Met (unchanged)
OAR 860-300-0020 (1)(j)	Description of participation in national and international forums, including workshops identified in section 2, chapter 592, Oregon Law 2021, as well as research and analysis the utility has undertaken to maintain expertise in leading-edge technologies and operational	Met	Met (unchanged)
OAR 860-300-0020 (1)(k)	Description of ignition inspection programs, as described in Division 24 of these rules, including how the utility will determine and instruct its inspectors to determine conditions that could pose an ignition risk on its own equipment and pole attachments	Partially Met	Partially Met (unchanged)

Idaho Power - Assessment of 2024 Plan Recommendations

Idaho Power Progress Against Staff Recommendations (Order 24-231)			
OPUC ID Number	Description	IE Conclusion: Met/Partially Met/Did Not Meet/Not Due	OPUC Staff Conclusion: Met/Partially Met/Did Not Meet/Not Due
1	240 Meter Buffer	Met	Met
2	Differentiation of YRZs and RRZs	Met	Met
3	Model Inputs, Weightings, and Methodology for Locational Risk	Not Due Until 2026	Not Due Until 2026
4	Risk Mitigation Impacts on Utility Risk	Met, but Not Due Until 2026	Met, but Not Due Until 2026
5	Evolution of Tables 7 and 9	Not Due Until 2026	Not Due Until 2026
6	Command Structure During Emergency Response	Met	Met
7	Type and Frequency of PSP Interactions	Met	Met
8	WMP Evolution Based on PSP Feedback	Met, but Not Due Until 2026	Met, but Not Due Until 2026
9	CBO Support for PSPS	Met	Met
10	Use of emPOWER in Oregon	Met	Met
11	Battery Rebates for PSPS	Met	Partially Met
12	PSPS Information to Cover Other Safety Topics	Met, but Not Due Until 2026	Met, but Not Due Until 2026
13	Community Outreach Effectiveness	Not Due Until 2026	Not Due Until 2026
14	Timing of Inspections and Corrections	Met	Met
15	Historic Ignitions and Risk Driver Analysis	Partially Met	Met
16	Evolution of Vegetation Management Program	Met	Met
17	Advancing Technology Maturity	Not Due Until 2026	Not Due Until 2026
18	IWRMC Results	Met	Met
19	Optimization of Vegetation Management Program	Partially Met	Partially Met
20	Align Inspection and Root Cause Analysis with Peers	Not Due Until 2026	Not Due Until 2026

UM 2209 Recommendations

Recommendations Specific to Idaho Power

IP_2501: OPUC Staff concurs with the IE that IPC should clarify its estimated timeline for circuit segment/zone of protection assessment of utility risk and wildfire risk modeling.

IP_2502: Idaho Power should explain the analysis it has conducted regarding battery (or other method of support) rebate program for medically vulnerable customers in Oregon. If Idaho Power does not intend to pursue such a program, it should explain why, or at minimum, explain how these customers are supported during PSPS or other resilience events.

IP_2503: Idaho Power should share its VRI with the other IOUs during any "best practice sharing meetings" and other collaborative venues.

- Approve Idaho Power's 2025 Wildfire Mitigation Plan Update and adopt Staff's recommendations, in attachment B, as areas for additional improvement for Idaho Power.