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

Office of Energy Infrastructure Safety
Wildfire Safety Division,
California Public Utility Commission

Resolution SPD-36

**COMMENTS OF THE GREEN POWER INSTITUTE
ON DRAFT RESOLUTION SPD-36**

June 12, 2025

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COMMENTS OF THE GREEN POWER INSTITUTE ON DRAFT RESOLUTION SPD-36

The Green Power Institute, the renewable energy program of the Pacific Institute for Studies in Development, Environment, and Security (GPI), provides these *Comments of the Green Power Institute on Draft Resolution SPD-36*.

The GPI has been involved in the review and analysis of WMPs since their inception and was actively engaged in the review and analysis of PacifiCorp's 2025 WMP Update, approved by the OEIS in May 2025. GPI generally supports the decision in Draft Resolution SPD-36 to ratify the OEIS Decision on PacifiCorp's 2025 WMP Update. Twenty new and updated ACIs issued in the OEIS Decision will guide continued improvement across PacifiCorp's annual WMP filings, as will required cross-utility benchmarking towards advancing wildfire risk mitigation methods across the CPUC jurisdictional footprint.

PacifiCorp made several significant risk model updates that represent real improvement in their modeling efforts since the beginning of their current three-year WMP (2023-2025). Improvements were made in the areas of implementing a new risk model for determining ignition risk levels, expansion of the modeling time framework from 8 hours to 24 hours, and establishment of a high fire risk zone for power lines that are outside of the state-established HFTD areas, but still represent substantial fire risk. OEIS endorses these modeling developments, and expects further model development in time for the new 2026-2028 WMP, which is due shortly.

Ongoing development and clear agency guidance is critical to establish improved standards for wildfire and reliability risk tolerance thresholds, risk model design, risk model output reporting, model output application, and proposed mitigation portfolio reporting that also unify utility wildfire risk modeling across California. Establishing quantifiable, top-down planning standards through state authority, instead of at each utility's discretion, will make strides towards clarifying suitable risk modeling approaches

that inform least-cost / best-fit wildfire and related reliability risk mitigations across California's HFTD, as well as in the next tier of risk as identified by the utilities.

GPI is also supportive of the Resolution statement that highlights the fact that ratification of the 2024 Update to PacifiCorp's 2023-2025 WMP does not represent approval for recovery of any expense for actions described in the WMP and its Update. That approval can only come from the utility's General Rate Case proceeding at the Commission.

CPUC review in the context of holistic system needs and rising costs is critical to balancing California's electrification and greenhouse gas emission goals, which intersect with wildfire mitigation planning through timely distribution system buildout, DER and system-level resource procurement, service reliability, and customer rate containment.

Conclusions

We support swift passage of the OEIS led, and CPUC ratified 2025 PacifiCorp WMP Update Approval via Resolution SPD-36, especially considering the incremental improvements, ongoing iterative development needs, and PacifiCorp's forthcoming 2026-2028 WMP.

Dated June 12, 2025

Respectfully Submitted,

A handwritten signature in blue ink, appearing to read "Gregg Morris", is written over a horizontal line.

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