



Dear PGE,

I write this open letter on behalf of Corbett Fire District #14 ("Corbett Fire") to address PGE's recent Public Safety Power Shut-Off ("PSPS"). In the early morning hours of September 9, 2022, PGE shut off power ("de-energized") to the bulk of the District, including in-district schools, fire stations and water district offices as well as the majority of residences.

Corbett Fire personnel met with PGE in preparation for the PSPS on a number of occasions, including as early as May 21, 2022 when PGE spokespeople discussed Community Resource Centers ("CRC"). At that time, consistent with PGE's online promises, PGE assured Corbett Fire such a center would be based in the Corbett Grade School parking lot and include an "ADA-accessible restroom and hand-washing station, basic medical equipment charging, device charging, Wi-Fi and other amenities." PGE personnel indicated the CRC would be set up by noon on the date of the power shut-off.

Hours before the September 9 implementation of the PSPS, PGE backtracked on this commitment. Instead, Corbett Fire provided facilities, auxiliary power and other amenities to mitigate PGE's sudden withdrawal. For its part, PGE provided nothing. Accordingly, attached is a bill which reflects Corbett Fire's (diesel) fuel costs to run its generator to provide the services to which PGE had committed. TO the extent PGE would like to now honor its commitment, the check can be made out to "Corbett Fire District #14" in the amount of the invoice.

Corbett Fire personnel also met with PGE on several occasions to understand the criteria PGE intended to apply to its PSPS decision. Of course, fire danger is at the heart of that calculation and Corbett Fire is in a unique position to assess that risk. Additionally, Corbett Fire has been through extreme fire danger in this area for decades and has institutional knowledge of the risks, factors and present conditions. In short, we have significant expertise to contribute to PGE's decisional process as it contemplates PSPS's. This is particularly important when risks related to fire and other emergency medical services created by the PSPS are contemplated; these include the risk presented by hundreds of generators being used over the course of the 60-hour PSPS; elderly residents without cooling and other basic household utilities and power; and rural residents with electric well pumps who are suddenly without water.

Despite Corbett Fire's deep, relevant and geographically specific knowledge of the fire risk, PGE declined to meaningfully consult with Corbett Fire ahead of its decision to de-energize. The lack of consult produced a result which was dangerous and counterintuitive.

PGE offered a couple of rationales for the reach of its de-energization. First, those areas in which a closed conifer canopy existed and, second, the north face of the Gorge (which is exposed to high winds moving in the Gorge itself) were subject to de-energization.

The first rationale makes sense on some level because Municipal fire departments are highly competent at ground level wildfires; once a fire is in the canopy of conifer trees it can be out of reach. While Corbett Fire has operational plans to attack limited-area canopy fires, once a fire reaches a conifer canopy, especially in high wind, it can rapidly defy any suppression efforts. However, the reach of the de-energization under the PSPS included in-district areas of pastureland and the schools – both of which are open, treeless and do not present the risks which PGE’s rationale identified. In other words, the reach of the power shut-off was inconsistent with the stated rationale.

The second rationale – the North face of the Gorge – makes sense insofar as the Gorge is a wind tunnel and the Eagle Creek Fire of 2017 illustrated this with devastating consequences. However, the reach of the de-energization included Aims, Larch Mountain, Gordon Creek and Trout Creek Roads and areas in between – all of which are entirely sheltered from the reach of the Gorge wind. The de-energization of these areas did not make sense in light of PGE’s stated rationale.

These inconsistencies in execution and preparation for the PSPS are troubling. Corbett Fire is committed to the well-being of this community and when PGE shuts down power to the District, it should do so with an understanding of the dynamics on the ground; consistent with a coherent rationale; and for a time period that makes sense. For instance, required fire alarm systems (like Corbett Schools, our fire stations in Aims and Springdale and some residences in forested areas throughout the District) must have 24 hours of battery capacity in the event of a power outage. PGE’s intentional shutdown lasted 60 hours; the 24-hour requirement is based on “best effort” actions by utility companies during “acts of nature” as, essentially, a worst-case scenario for an outage. An intentional outage which outpaces this contingency is, at best, a reckless disregard of the patent exposure that results for the 36 hours during which schools and similar buildings are potentially without alarms because of PGE’s action.

Finally, Corbett Fire is a robust, well-staffed, well-equipped and highly trained fire district. The out-of-control fires in September of 2020 were in areas with fire protection that was substantially less than what we provide routinely. In that time, we responded to 17 calls in 3 hours under highly challenging conditions. While we understand outlying districts were at times overwhelmed, Corbett was not. Had PGE consulted with Corbett Fire prior to its unilateral decision to cut power – or at any point in its process – we could have provided this additional information and some insight into what areas could have been reasonably de-energized.

Corbett Fire was essentially subject to a dangerous “solution” for a problem that didn’t exist within its boundaries. A careful examination of the risks, consistent with PGE’s own stated goals and criteria would have prevented the need for a local de-energization. Had PGE used Corbett Fire as an information source and partnered with this local resource, it could have made a more accurate, safer and informed decision about the reach of its de-energization. Each of these changes are requested as we move forward into fire seasons in the coming years.

Respectfully,

/s/ David Shannon  
Board Chair, Corbett Fire District #14



Invoice

Pounder Oil Service, Inc.  
P.O. Box 824  
Troutdale, OR 97060  
(503) 695-2555

Invoice Number: 0085543-IN  
Invoice Date: 9/9/2022

*PS PS event  
9/9/22*

0000  
Customer Number: 0002145

Sold To:  
Corbett Fire Dist #14  
PO Box 1  
Corbett, OR 97019  
Confirm To:

Ship To:  
PO Box 1  
Corbett, OR 97019

Customer P.O.	Terminal Bill of Lading #	Customer Order #	Terms	Shipped	Price	Amount
			Net 30 days			
HH	71.0	GAL		71.0	4.6600	330.86
Home Heating Oil - LS Dsl #2 Dyed		Whse: 009				

*9/30/22  
P10 10/4/22  
C# VBAC NNCP*

*EW  
9/28/22*

Net Invoice:	330.86
Less Discount:	0.00
Freight:	0.00
Sales Tax:	0.00
<b>Invoice Total:</b>	<b>330.86</b>