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March 28, 2024

To: Portland General Electric (PGE), City Manager, City of Lake Oswego (City) and Oregon Public Utilities Commission (OPUC):

Via email:

PGE: customer.service@pgn.com and pgecommunications@pgn.com

City Manager: mbennett@ci.oswego.or.us

OPUC: puc.consumer@puc.oregon.gov

From:

Frédérique Lavios, Chair - Palisades Neighborhood Association (PNA)

Diane Froelich, President - South Shore Estates HOA

Kathy Glaser, President - Atherton Heights HOA

Barbara Cullicott, Chair Sunny Hill HOA

Re: Reliability and Safety Concerns of our neighborhood and homes

We write to PGE, the City and OPUC to express our growing concerns about the reliability and safety of electric service to our neighborhood and homes. The PNA is the general footprint of the neighborhood we are writing about. The individuals and HOAs joining in this letter are all located within the PNA footprint which can be found here on the City's website:

<https://palisadesneighborhood.org>

In addition to expressing our concerns, we are asking for a meeting between us and PGE, the City and OPUC to discuss these concerns and solutions. The prompt for this letter was the recent outage from approximately January 13 to January 16th of about 80 hours for most of the neighborhood. The actual outage durations were shorter and longer for some based on the restoration. We experienced a similar event in February 2021 of approximately 4-6 days. Additionally, some of us experience momentary outages throughout the year in addition to these long-duration outages which gives us a serious safety concern if these are summer tree-line contacts.

In addition to what we believe is a serious quality of service issue we are also concerned about the quality of information and service trends. For example, we did not get information about the Estimated Time of Restoration (ETOR) until past 48 hours.

Additionally, the PGE website incorrectly notified at least some of us of restoration when in fact service had not been restored. This situation leads to confusion about whether people should leave to seek shelter elsewhere or people returning home thinking service had been restored when it had not been. These long outages have resulted in everything from small property losses (e.g., lost food) to major property damage (e.g., flooding and major damage of homes due to frozen and burst pipes caused by lost power). Fortunately, we are not aware of any injuries or loss of life, but our concerns include this potential too.

Our individual Lake Oswego residence experience ranges from relative newcomers to this area to long-term residents. The long-time residents share that they feel the problems have grown worse in the past few years. Newcomers share that they feel our reliability is worse than other parts of Oregon and the country where we have come from including areas that are heavily treed like the PNA area. Rather than relying on anecdotal beliefs or “feelings,” we want to have a data-driven conversation about this which is why we have included our information request in Attachment 1 that we would like to receive ahead of our requested meeting.

We recognize that our neighborhood is heavily treed. In fact, the City has recently completed its draft report for management of our urban forest. The City recognizes that we indeed live in a forest and forests are challenges to electric systems in terms of reliability and safety. This is why our concerns are serious and growing.

While most people who move to this area love the feeling of nature and our urban forest environment, we are concerned about the issues this creates. Several years ago, for example, there was quite a “dust-up” over PGE’s tree trimming along South Shore Blvd which is both a major traffic thoroughfare and the location of part of our distribution circuit. We suspect that the major cause of the 2021 and more recent major outages were tree branches or whole trees going over and knocking down PGE facilities and blocking roads. Even for a layperson, one can drive along South Shore and see trees leaning at 45 degrees that will continue to threaten PGE facilities, other utility infrastructure and other public facilities like roads. We think these are major issues that must be addressed. While we love trees, we do not agree that trees that pose a threat to life, public safety or property should be saved.

While the two most recent electric outages were in the winter due to ice and wind, our concern is also summer. We are deeply concerned about how the PGE system will be impacted during another kind of weather event like a red flag warning where we experience high winds combined with high temperatures and low humidity. Today, we do not think circuit(s) serving our neighborhood are subject to a Public Safety Power Shut off (PSPS), but we wonder if we face a similar kind of threat given that we are in an urban forest.

We understand that PGE has adopted the PSPS practice, as have many utilities across the West, and would like to know if our area could be subject to a PSPS interruption so we can plan accordingly. This concern of a potential fire is amplified by the City’s consideration of possibly closing the South Shore Fire Station. If a summer fire does start in our neighborhood during something like a red flag warning the only hope of fighting it is to fight it within minutes before it spreads beyond the capability of LOFD and the limited LO water system to fight a rapidly growing wildfire.

In terms of solutions, many of us think undergrounding to eliminate the risk of overhead tree contacts makes intuitive sense, but we also know that undergrounding is expensive. Some of us have a background in the utility industry and think selective undergrounding,

circuit segmentation and other approaches could improve reliability and safety. Yes, these are also expensive, but when we consider the cost of lost property and costs borne by residents to deal with poor reliability, we think it makes sense to explore all options.

We hope that PGE, the City and OPUC will meet with us to discuss our concerns. Our proposed agenda is:

1. Introductions and Purpose of Meeting
2. Understand the current situation (just the facts). We see PGE taking lead on this, but residents will also use the information requested in Attachment 1 to provide our perspectives
3. Primary causes of outages, practical solutions and barriers.
4. Role of the City (e.g., tree management, policies and issues associated with undergrounding)
5. Discussion about PSPS applying to our areas. Likely or unlikely? Status of South Shore fire station.
6. Role of PGE's regulator OPUC
7. Summary, next steps and timeline.

In addition to responding to us, please include Roger Gray (PNA-7 Representative) at rjgray9@yahoo.com as the point of contact for follow-up on this matter.

Thank you for considering our request.

Sincerely:

Frédérique Lavios, Chair - On behalf of the Palisades Neighborhood Association Board

Diane Froelich, President - South Shore Estates HOA

Kathy Glaser, President - Atherton Heights HOA

Barbara Cullicott, Chair Sunny Hill HOA

(All approved for digital signature in support of this letter.)