



October 1, 2026

Dear Stakeholders,

Enclosed is the Office of Energy Infrastructure Safety's (Energy Safety's) Annual Performance Report regarding PacifiCorp's execution of its 2024 Wildfire Mitigation Plan.

This Annual Performance Report is published as of the date of this letter. PacifiCorp may, if it wishes to do so, file a public response to this Annual Performance Report within 14 calendar days of the date of publication. Comments must be submitted to Energy Safety's E-Filing system in the 2024 Annual Performance Report docket.¹

Sincerely,

/s/ Patrick Doherty

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¹ Submit responses to the [2024-APR](https://efiling.energysafety.ca.gov/EFiling/DocketInformation.aspx?docketnumber=2024-APR) docket via the Office of Energy Infrastructure Safety's E-Filing system here: <https://efiling.energysafety.ca.gov/EFiling/DocketInformation.aspx?docketnumber=2024-APR>



OFFICE OF ENERGY INFRASTRUCTURE SAFETY

2024 ANNUAL PERFORMANCE

REPORT

PACIFICORP

October 2026

TABLE OF CONTENTS

Executive Summary 1

1. Introduction 2

2. Performance Assessment Process..... 2

3. PacifiCorp 2024 Wildfire Mitigation Plan..... 3

4. PacifiCorp Annual Report on Compliance 6

5. Independent Evaluator ARC for PacifiCorp 7

6. WMP Initiative Attainment Performance 10

 6.1 PacifiCorp 2024 WMP Initiative Activities Assessed by Energy Safety 11

 6.2 Energy Safety Vegetation Management Audit Report 12

 6.3 Energy Safety Field Inspection Assessment..... 14

 6.3.1 Inspection and Notice Counts 14

 6.3.2 Data Accuracy and Completeness Issues Observed by Field Audits..... 16

 6.4 PacifiCorp WMP Objective and Initiative Attainment in 2024 18

 6.4.1 Impact of Initiatives with Missed Targets on Proposed Expenditures..... 21

 6.4.2 Impact of Initiatives with Missed Targets on Risk Reduction..... 22

 6.5 PacifiCorp 2024 WMP Expenditure Assessment..... 24

 6.6 Initiative Performance Observations and Conclusions..... 24

7. Ignition Risk Performance 25

 7.1 Ignition Rates 26

 7.2 Wire Down Event Rates 29

 7.3 Outage Event Rates..... 32

8. Public Safety Power Shutoff Event Performance 35

9. Outcome Metric Performance 42

10. Reporting Accuracy and Completeness Performance..... 46

 10.1 QDR as compared to EC ARC..... 47

 10.2 VMA Report Identified Issues 48

10.3 IE ARC Evaluation 49

10.4 Comparison of Spatial and Tabular QDR Data..... 49

10.5 Field Inspection Issues Identified 52

10.6 Data Accuracy and Completeness Conclusions..... 53

11. Conclusion 53

12. References 55

13. Appendices 63

Appendix A: PacifiCorp Information on WMP Initiative Attainment 63

Appendix B: PacifiCorp Vegetation Management Audit Report 83

Appendix C: Normalizing Metrics and Raw Count Data 86

LIST OF TABLES

Table 1: Summary of Energy Safety's Findings Regarding Completion of PacifiCorp's VM Initiatives in its 2023-2025 WMP for Performance Year 2024. 12

Table 2. Energy Safety Inspection Counts and Notices of Violation or Non-Performance, by Initiative..... 15

Table 3. Energy Safety Inspection Counts and Data Accuracy and Completeness Issues, with Percentage of Inspections Where Issues were Observed 16

Table 4. Energy Safety Estimates of Data Accuracy and Completeness Issue Impacts on Reported WMP Compliance 17

Table 5. PacifiCorp WMP Initiatives with Missed Targets 19

Table 6. Energy Safety Summary of Initiatives with Inconsistent QDR Reporting 49

Table 7. Energy Safety Summary of Ignition Risk Metrics with Inconsistent QDR Reporting... 51

Table 8. References for Citations..... 55

Table 9. WMP Initiative Activity Attainment Information 64

Table 10. Energy Safety Findings from PacifiCorp 2024 VMA Report of WMP Vegetation Management Initiatives 83

LIST OF FIGURES

Figure 1. QA/QC Maturity Overview Sunburst Chart..... 10

Figure 2. PacifiCorp Ignitions per OCM (2017-2024) by HFTD Tier 27

Figure 3. PacifiCorp Ignition Events Delineated by Risk Driver 28

Figure 4. PacifiCorp 3-Year Average (2022-2024) of Monthly Ignition Events by HFTD Tier..... 29

Figure 5. PacifiCorp Wire Down Events per OCM (2017-2024) by HFTD Tier..... 30

Figure 6. PacifiCorp Wire Down Events Delineated by Risk Driver 31

Figure 7. PacifiCorp 3-Year Average (2022-2024) of Monthly Wire Down Events by HFTD Tier. 32

Figure 8. PacifiCorp Outages per OCM (2017-2024) by HFTD Tier 33

Figure 9. PacifiCorp Outage Events Delineated by Risk Driver 34

Figure 10. PacifiCorp 3-Year Average (2022-2024) of Monthly Outage Events by HFTD Tier 35

Figure 11. PacifiCorp PSPS Event Scope per Event (2017-2024) 37

Figure 12. PacifiCorp PSPS Event Duration-Customers per Event (2017-2024) 38

Figure 13. PacifiCorp PSPS Event Duration - Critical Infrastructure per Event (2017-2024) 39

Figure 14. PacifiCorp PSPS Event Impacts on Number of Customers per Event (2017-2024) .. 40

Figure 15. PacifiCorp 3-Year Average (2022-2024) Monthly PPS Event Percentages 41

Figure 16. PacifiCorp Total Acres Burned (2017-2024) 43

Figure 17. PacifiCorp Structures Damaged or Destroyed (2017-2024) 44

Figure 18. PacifiCorp Injuries and Fatalities (2017-2024) 45

Figure 19. PacifiCorp Value of Destroyed Assets (2017-2024) 46

Figure 20. PacifiCorp Overhead Circuit Miles (2017-2024) by HFTD Tier 86

Figure 21. PacifiCorp Ignition Event Counts (2017-2024) by HFTD Tier 87

Figure 22. PacifiCorp Wire Down Event Counts (2017-2024) by HFTD Tier 88

Figure 23. PacifiCorp Outage Event Counts (2017-2024) by HFTD Tier..... 89

Figure 24. PacifiCorp PPS Events Frequency (2017-2024)..... 90

Figure 25. PacifiCorp PPS Event Scope (2017-2024)..... 91

Figure 26. PacifiCorp PPS Event Duration (2017-2024) 92

Figure 27. PacifiCorp PPS Event Impacts on Critical Infrastructure (2017-2024) 93

Figure 28. PacifiCorp PSPS Event Impacts (2017-2024)..... 94

Executive Summary

Energy Safety's primary objective is to ensure that electrical corporations reduce wildfire risk and adhere to their approved Wildfire Mitigation Plans (WMPs), which are annually filed pursuant to Public Utilities Code section 8385 *et seq.* Energy Safety's annual performance evaluation of PacifiCorp is a comprehensive look at the implementation of its 2024 WMP and its catastrophic wildfire risk reduction initiatives.

PacifiCorp completed 28 of 37 (76%) of its 2024 WMP initiatives. PacifiCorp's missed initiative targets were primarily related to grid hardening and vegetation management work intended to reduce risk on PacifiCorp's system. Grid hardening and vegetation management initiatives were also missed periodically during the 2020-2023 period, including those related to covered conductor installation, clearing vegetation around poles, wood and slash management, data governance, and community engagement. For example, PacifiCorp failed to meet any of its annual covered conductor targets during the 2020 to 2024 period. This suggests a more systemic issue with PacifiCorp's implementation of its WMP work generally that it must address. By missing these targets PacifiCorp failed to reduce risk on its system in the manner committed to its customers and the people of California through its WMP.

In addition, Energy Safety identified several other areas for improvement:

- PacifiCorp's independent evaluator recommended several improvements to PacifiCorp's quality assurance and quality control (QA/QC) programs, including that PacifiCorp formally document and define QA/QC program roles and responsibilities, develop QA/QC onboarding and refresher trainings, create a centralized data repository for all QA/QC data, use inspections and audit results to improve QA/QC processes, procedures and trainings, and adopt automation and tools to improve efficiencies in data collection and management of QA/QC findings.
- Energy Safety found that the method and urgency of PacifiCorp's execution of necessary corrective actions to address deficiencies in its vegetation management program have not demonstrated a commitment to risk reduction and program maturation. The basis for this determination is PacifiCorp's lack of timely and effective corrective actions for year over year findings in the 2020-2024 Vegetation Management Audit (VMA) Reports.
- As noted in the Independent Evaluator Annual Report on Compliance (IE ARC) and Energy Safety's VMA Report, PacifiCorp's recordkeeping does not demonstrate proper tracking of completed initiative activity work. Energy Safety's field inspections also detected inaccurate data with respect to completed WMP work. PacifiCorp's spatial and tabular data reports to Energy Safety throughout 2024 were also inconsistent when compared to each other, with variances between initiative datasets averaging approximately 50%. These problems have persisted for many years and have been identified in prior reports. PacifiCorp must improve the accuracy of its WMP implementation documentation practices. Energy Safety will monitor PacifiCorp's reporting and expects improvements regarding the accuracy of PacifiCorp's documentation and tracking processes going forward.

Going forward, PacifiCorp must show, through consistent action, that it will honor its WMP commitments and thus meaningfully reduce wildfire risk in the manner committed to its customers and the people of California through its WMP. Energy Safety will scrutinize PacifiCorp's future WMP performance and continue to report on any failures by PacifiCorp to achieve its own objectives to reduce the risk of catastrophic wildfire in California.

1. Introduction

Energy Safety's primary objective is to ensure that electrical corporations reduce wildfire risk and adhere to their approved Wildfire Mitigation Plans (WMPs).¹ This Annual Performance Report (APR) presents the Office of Energy Infrastructure Safety's (Energy Safety's) statutorily mandated assessment of PacifiCorp's performance relative to its 2024 targets for initiatives and objectives in its 2023-2025 Base Wildfire Mitigation Plan (2023-2025 Base WMP) and approved Change Order Requests. While the 2023-2025 Base WMP considers activities over a three- and 10-year horizon, this report only addresses targets established for initiatives and objectives to be executed in 2024. Therefore, this report uses the term "2024 WMP" to refer to portions of the 2023-2025 Base WMP and approved Change Order Requests addressed by this report.

In the sections that follow, Energy Safety describes the statutory and regulatory basis for its reporting, the 2024 WMP, the information supplied by PacifiCorp, the independent evaluation conducted by a third-party independent evaluator that examined PacifiCorp's implementation of its 2024 WMP, and an assessment of how PacifiCorp implemented its 2024 WMP. Finally, Energy Safety provides its conclusions and recommendations for further actions by PacifiCorp.

2. Performance Assessment Process

The statutory objective of electrical corporation wildfire mitigation planning efforts is to ensure that electrical corporations are constructing, maintaining, and operating their infrastructure in a manner that will minimize the risk of catastrophic wildfire.²

Government Code section 15475(b)(2) directs Energy Safety to develop performance metrics to achieve maximum feasible risk reduction to be used to develop the wildfire mitigation plan and evaluate an electrical corporation's performance relative to the implementation of that plan.

¹ Government Code Section 15475.1(a).

² Pub. Util. Code section 8386(a).

In this report, Energy Safety considers the totality of all performance assessments completed with respect to PacifiCorp's 2024 WMP. This includes all inspection, audit, investigation, and data analysis work performed by Energy Safety, as well as separate electrical corporation and independent third-party evaluations of implementation.

The following is an overview of the five dimensions of performance assessed by Energy Safety:

1. Energy Safety assessed *2024 WMP attainment performance* by determining whether the electrical corporation met the 2024 WMP targets for initiatives and objectives, looking specifically at whether the electrical corporation funded and performed the work stated for each initiative, and by performing field inspections of WMP work claimed to be completed by PacifiCorp;
2. Energy Safety assessed *ignition risk performance* by tracking ignition rates, wire down rates, and unplanned outage rates – all indicators of ignition risk;
3. Energy Safety assessed *Public Safety Power Shutoff (PSPS) performance* by tracking the frequency, scope, duration and impact of PSPS events;
4. Energy Safety assessed *outcome metric performance* by tracking the number of acres burned, number of buildings damaged or destroyed, number of fatalities or injuries, and total value of assets lost due to wildfires ignited by PacifiCorp's equipment; and
5. Energy Safety assessed *data accuracy and completeness performance* by crosschecking data from various utility reporting mechanisms, assessing the accuracy of data submitted by PacifiCorp during field auditing of PacifiCorp's WMP work, reviewing multiple reports, reviewing a formal quality assurance and quality control evaluation, and identifying issues encountered during the performance assessment process.

3. PacifiCorp 2024 Wildfire Mitigation Plan

PacifiCorp originally submitted a Base WMP on May 8, 2023 covering a three-year term from 2023 through the end of 2025.

Energy Safety approved PacifiCorp's 2023-2025 Base WMP on February 22, 2024.³ For the purpose of this report, Energy Safety refers to the Base 2023-2025 WMP, any approved Change Order Requests, as well as the 2024 targets and initiatives, collectively as the 2024 WMP.

³ 2023-2025 Base WMP Decision.

PacifiCorp's 2024 WMP highlighted past and ongoing efforts to address wildfire risk and reduce the impacts of PSPS events.⁴ The 2024 WMP described 37 initiatives which are divided up into five categories and summarized here:

1. **Grid Design, Operations, and Maintenance:** PacifiCorp's overall goals in this category were to "reduce the occurrence of events involving the emission of sparks, or other forms of heat, from electrical facilities or reduce the impact of an existing wildfire on utility infrastructure and reduce overall wildfire risk associated with the design and type of equipment used to construct electrical facilities."⁵ Relevant initiatives in this category included line rebuild/covered conductor (GH-01), distribution pole replacements (GH-02), and asset inspections (AI-02).
2. **Vegetation Management and Inspections:** PacifiCorp's vegetation management program aimed to maintain safe clearances between vegetation and conductors, and the inspection programs are intended to "minimize vegetation related reliability, safety, and wildfire ignition risks."⁶ Relevant initiatives included detailed inspections-distribution (VM-01) and fuels management (VM-05).
3. **Situational Awareness and Forecasting:** PacifiCorp's overall goal in this category was to build out and maintain an environmental monitoring network that informed near-real-time risk assessment and weather forecast validation.⁷ Relevant initiatives in this category included wildfire cameras (SA-02) and weather stations (SA-01).
4. **Emergency Preparedness:** PacifiCorp's overall goal for this category was to "evaluate, develop and implement wildfire and PSPS specific emergency preparedness activities as part of a holistic emergency preparedness strategy."⁸ Relevant initiatives for this category included external collaboration and coordination (EP-02).
5. **Community Outreach and Engagement:** PacifiCorp's initiatives in this category aimed to maintain a "flexible, dynamic education and awareness strategy that is informed by customer survey data, community stakeholder input and community needs."⁹ Relevant initiatives for this category included PacifiCorp's public outreach and education awareness program (CO-01).

The 2024 WMP also contained three- and ten-year objectives.

Selected three-year objectives included:¹⁰

⁴ 2024 WMP, pages 16-19.

⁵ 2024 WMP, pages 139-140.

⁶ 2024 WMP, pages 183 and 190.

⁷ 2024 WMP, page 214-216.

⁸ 2024 WMP, page 250.

⁹ 2024 WMP, page 304.

¹⁰ 2024 WMP, pages 132-133, 184, 213-214, 251, and 298.

- Line rebuild and installation of covered conductor within PacifiCorp's High Fire Threat Districts (HFTD) (GH-01).
- Planned inspections programs (AI-01, AI-02, AI-03, AI-04, AI-05, AI-08).
- Improved quality assurance/quality control programs for vegetation management work (VM-11).
- Continued use of tabletop exercises to prepare for emergencies and PSPS events (EP-02).
- Continued coordination with public safety partners in communities throughout California regarding wildfire safety and preparedness and PSPS (CO-03).

Selected ten-year objectives included:¹¹

- Line rebuild and installation of covered conductor on all identified overhead lines miles within the HFTD (GH-01).
- Completed system automation upgrades on all identified relays (GH-04).
- Continued expansion and refinement of PacifiCorp's weather station network (SA-01).
- Increased availability of website wildfire and PSPS resources in additional languages (CO-01).

Of particular importance were the following objectives which have targets or goals for 2024:

- Continued line rebuild and covered conductor installation with a 2024 target of 80 line-miles.
- Completed installation of system automated equipment (GH-04) with a 2024 target of 20 devices.
- Continued improvements to quality assurance/quality control programs for vegetation management (VM-11) with a 2024 target of applying these programs to PacifiCorp's work on 865 distribution line-miles and 99 transmission line-miles.
- Continued expansion and refinement of PacifiCorp's weather station network (SA-01) with a 2024 target of eight weather station installations.

Descriptions of the activities and objectives of the programs and initiatives contained in PacifiCorp's 2024 WMP are listed in the table in Appendix A.

¹¹ 2024 WMP, pages 133-134, 185, 214, 251, and 299-300.

4. PacifiCorp Annual Report on Compliance

Public Utilities Code section 8386.3(b)(1) directs electrical corporations to file a self-evaluation report addressing the electrical corporation's implementation of its approved plan during the prior calendar year. This document is known as the Electrical Corporation Annual Report on Compliance (EC ARC).

Energy Safety's Compliance Guidelines outlined the requirements for an EC ARC prepared to address the 2024 calendar year and filed by the electrical corporation in early 2025. The EC ARC was required to detail the electrical corporation's self-assessment of its performance with the 2024 WMP during 2024.¹²

PacifiCorp submitted its EC ARC to Energy Safety on March 31, 2025.¹³ In its EC ARC, PacifiCorp listed six initiatives for which it did not meet its quantitative targets. Four of the six initiatives were related to asset inspections (AI-04, AI-05, AI-06, AI-11). The scale of these missed targets was small. PacifiCorp's EC ARC reported that over 99% of the original 2024 WMP targets for AI-04, AI-05, and AI-06 were met, and over 98% of the original 2024 WMP target for AI-11 was met.¹⁴ PacifiCorp's explanation for missing these asset inspection targets was that it determined that a small number of the assets originally scheduled for inspection did not actually require inspection in 2024, which led to the inspection of fewer assets than originally included in the 2024 WMP targets.

The remaining two missed initiatives reported as missed by PacifiCorp were for two grid hardening initiatives: covered conductor installation (GH-01), and system automation (GH-04). PacifiCorp stated it was unable to complete these two initiatives due to internal and external staffing availability, and a delayed start to work on projects related to covered conductor installation. The delay continued work into winter months until it could not continue due to weather impacts.^{15, 16}

The EC ARC is considered by Energy Safety as well as by the independent evaluator in its assessment of PacifiCorp's WMP performance or evaluation of WMP implementation, respectively. For a summary of the EC ARC information on initiative completion and actual spending, see the table in Appendix A.

¹² 2024 Compliance Guidelines.

¹³ EC ARC.

¹⁴ EC ARC, pages 17-20.

¹⁵ EC ARC, pages 14-16.

¹⁶ IE ARC, page 33.

5. Independent Evaluator ARC for PacifiCorp

Energy Safety, in consultation with the Office of the State Fire Marshal, annually publishes a list of entities qualified to serve as independent evaluators of WMP compliance.¹⁷ Each electrical corporation is then required to hire an independent evaluator (IE) from the list of approved evaluators to perform an annual independent WMP compliance evaluation.¹⁸

The IE reviews and evaluates the electrical corporation's compliance with its approved WMP. As part of its evaluation, the IE must investigate instances of large deviation in actual expenditure greater than 10% as compared to the proposed expenditure amount in the associated WMP.

The 2024 Independent Evaluator Annual Report on Compliance (IE ARC) for PacifiCorp was prepared by NV5 Guidehouse, Inc. The IE ARC included a review of the wildfire mitigation initiatives and activities implemented in 2024, and an accounting of whether PacifiCorp met its performance targets, deviated from its budget, and followed its quality assurance and quality control (QA/QC) processes.

The IE utilized a variety of techniques to analyze PacifiCorp's progress toward meeting its 2024 WMP commitments, such as inspecting a sample of PacifiCorp's field-verifiable 2024 WMP initiatives, performing desk reviews of non-field verifiable initiatives, interviewing selected utility staff, and reviewing the 2024 WMP and 2024 EC ARC.¹⁹ In the IE ARC, the IE referenced that it validated a total of 45 initiatives.²⁰ The IE's initiative count was higher than the number of 2024 WMP initiatives considered in this report due to its work in validating additional initiatives that did not have targets or objectives for 2024. The IE ARC included sample verification statistics, an opinion on initiative completions, and actual expenditures for each initiative.²¹

The IE ARC findings are summarized by initiative in Appendix A. The IE concluded that PacifiCorp "is largely achieving the reviewed initiative objectives, is not failing to fund the portfolio of its initiatives, and appears to be following its QA/QC process, to the degree that they are documented."²²

The IE ARC identified 11 (24%) of 45 initiatives as either incomplete or not validated. Six of the 11 initiatives were identified as missed in the EC ARC, three initiatives were determined to be

¹⁷ Pub. Util. Code Section 8386.3(b)(2)(A).

¹⁸ Pub. Util. Code Section 8386.3(b)(2)(B)(i).

¹⁹ IE ARC, pages 19-29.

²⁰ IE ARC, pages 21-23.

²¹ IE ARC Appendix, Table 2.

²² IE ARC, page 1.

incomplete due to new findings developed by the IE, and two more initiative targets that the IE identified as incomplete were inapplicable to this report's analysis of the 2024 WMP as they were associated with longer-term objectives beyond 2024.

The IE ARC identified nine 2024 WMP initiatives with missed targets, as follows:

1. Covered conductor installation (GH-01): PacifiCorp targeted 80 line miles and completed 72 line miles (90%).
2. Installation of system automation equipment (GH-04): PacifiCorp targeted 20 devices to install and completed 11 (55%).
3. Distribution Detail Inspections (AI-04): PacifiCorp targeted 8,672 inspections and completed 8,628 (99%).
4. Transmission Intrusive Pole Inspections (AI-05): PacifiCorp targeted 783 inspections and completed 780 (99%).
5. Distribution Intrusive Pole Inspections (AI-06): PacifiCorp targeted 2,523 inspections and completed 2,571 (99%).
6. Enhanced (Infrared) Inspection – Transmission Lines (AI-07): PacifiCorp targeted 700 line-miles and completed 693 (99%).
7. Substation inspections (AI-11): PacifiCorp targeted 451 substation inspections and completed 443 (98%).
8. Pole clearing (VM-05): PacifiCorp targeted 3,126 units and completed 2,438 units (77%).
9. Public outreach and education awareness program (CO-01): the IE determined that pre- and post-fire season surveys were documented, and survey targets were achieved; but the medical certificate application in an additional language was not available and therefore the initiative was not completed.²³

As a result of the evaluation conducted, the IE provided observations on PacifiCorp's performance in certain areas:

- Data quality: the IE noted in several sections of the IE ARC that PacifiCorp provided documentation that was incomplete, did not match field conditions, contained errors, and contained confusing or conflicting information. For example, VM inspection initiatives referenced targets in circuit-mile units but reported actual progress in line-miles. The IE recommended that PacifiCorp take steps to verify the information in reports provided by contractors.²⁴
- Target setting: The IE noted that addressing the issues with data quality across all the initiative categories would allow PacifiCorp to set targets that were clear, verifiable, and capable of being appropriately documented.²⁵

²³ This initiative had three specific targets. PacifiCorp met two of the three targets.

²⁴ IE ARC, pages 73-74.

²⁵ IE ARC, page 55.

Finally, the IE reviewed PacifiCorp's QA/QC processes, assigning scores from 0 to 4 for five QA/QC Maturity Model metrics (Figure 1). For a full description of the QA/QC Maturity Model, see the IE ARC Outline and the IE ARC.^{26, 27}

In the IE ARC, the IE concluded that PacifiCorp did not have a well-developed and documented QA/QC process for WMP initiative completion. One metric (Quality Inspections/Audits) received a score of two out of four. Four of the metrics (Roles and Responsibilities, Quality Culture, Quality Management System, and QA/QC Technology Adoption) received scores of one out of four, which means that these elements of PacifiCorp's QA/QC program could only be considered as "initiated."

The IE found that PacifiCorp's QA/QC program for assets was better developed than its QA/QC program for vegetation management. For the asset program, the IE noted that PacifiCorp had begun using cellphones and tablets to document inspection records and findings and developed a new tool to evaluate and interpret inspections results for insight into trends and provide a deeper understanding of fire risk conditions. For the vegetation management QA/QC program the IE noted that "PacifiCorp does not appear to have a robust vegetation management QA/QC program in place."²⁸ The IE did note that PacifiCorp uses its Mobile Data Management Software to record inconsistencies or missed work and that PacifiCorp's contractors have access to this information. The IE also noted that PacifiCorp had hired additional staff throughout its territory to increase internal post-audit capacity along with improvements to its work management process.

The IE recommended that following changes to PacifiCorp's QA/QC programs: formally documenting and defining QA/QC program roles and responsibilities, developing QA/QC onboarding and refresher trainings, creating a centralized data repository for all QA/QC data, using inspections and audit results to improve processes, procedures and trainings, and adopting automation and tools to improve efficiencies in data collection and management of findings.²⁹

²⁶ IE ARC Outline, page 14.

²⁷ IE ARC, pages 113-120.

²⁸ 2024 WMP, page 114.

²⁹ 2024 WMP, pages 119-120.

Figure 1. QA/QC Maturity Overview Sunburst Chart³⁰

6. WMP Initiative Attainment Performance

Energy Safety's assessment of PacifiCorp's performance in 2024 indicates that PacifiCorp attained 28 (76%) of its 37 targets for its 2024 WMP initiatives. The subsections below further describe Energy Safety's assessment of PacifiCorp's execution of its 2024 WMP.

Section 6.1 provides an overview of the 2024 WMP initiatives assessed for attainment by Energy Safety. Section 6.2 describes the vegetation management assessments performed by Energy Safety. Section 6.3 provides an overview of Energy Safety's field inspection of both grid hardening and vegetation management activities related to PacifiCorp's 2024 WMP work, including inaccuracies in PacifiCorp's data regarding completed WMP work. Section 6.4 summarizes the initiatives with missed targets, and provides three perspectives on the impact of PacifiCorp's failure to meet some of its 2024 WMP targets: percentage of completion, budget impacts, and risk reduction impacts. Section 6.5 provides an overview of the 2024 WMP proposed expenditures and compares them to the actual expenditures. Finally, Section 6.6 summarizes the conclusions and observations made by Energy Safety regarding

³⁰ IE ARC, page 118.

PacifiCorp's implementation of its WMP commitments in 2024. Additional performance assessments appear in Sections 7 through 10.

6.1 PacifiCorp 2024 WMP Initiative Activities Assessed by Energy Safety

Energy Safety assessed PacifiCorp's attainment performance on 37 wildfire mitigation initiative activities from the 2024 WMP.³¹ The initiatives are grouped into five main categories:

1. Grid Design, Operation, and Maintenance with 16 initiatives assessed and an associated proposed expenditure of \$65 million.
2. Vegetation Management and Inspections with 16 initiative activities assessed and a proposed expenditure of \$18.4 million. Of the 16 initiatives, 13 initiatives were assessed in the Vegetation Management Audit (VMA) Report and the remaining three were assessed in this APR.
3. Situational Awareness and Forecasting with two initiatives assessed and a proposed expenditure of \$1.2 million.
4. Emergency Preparedness with two initiatives assessed and a proposed expenditure of \$30,000.
5. Community Outreach and Engagement with one initiative assessed and a proposed expenditure of \$90,000.

A complete list of initiatives along with expenditure information appears in the table in Appendix A.

The initiative performance assessment process included comparing the actual initiative completion as reported by PacifiCorp in its quarterly data reports (QDRs) to Energy Safety and in its EC ARC, and as reported by the IE in the IE ARC.³² The information from each of these sources is summarized along with the final assessment of performance for each initiative in the table in Appendix A. In some cases, Energy Safety issued data requests to answer specific questions. If data request information is used in the assessment, a citation for the particular instance is provided. Statistics and findings from Energy Safety field audits of 2024 WMP work are also considered. Finally, the Energy Safety VM Audit Report also contributed to Energy Safety's APR assessment.

³¹ 2024 WMP, pages 134-137, 185-187, 215, 253, 268-269.

³² 2024 Q4 QDR, Table 11; EC ARC, p.28; and IE ARC, Appendix, Table 2.

6.2 Energy Safety Vegetation Management Audit Report

Each performance year Energy Safety completes an audit of the vegetation management work performed by an electrical corporation as described in its approved WMP (the Vegetation Management Audit (VMA)).³³ In the VMA, Energy Safety assesses completeness of each qualitative commitment and quantitative target associated with each initiative from the electrical corporation's approved WMP. The VMA issues findings on the initiative level, as defined in Appendix A of the 2023-2025 Wildfire Mitigation Plan Technical Guidelines.³⁴

The VMA is sent to the electrical corporation, which then has the opportunity to provide Energy Safety with a corrective action plan (CAP) to address any deficiency identified in the VMA. Energy Safety analyzes the CAP and issues a VMA Report that documents any outstanding deficiencies and describes the electrical corporation's overall program performance for that year.

For performance year 2024, Energy Safety issued its VMA to PacifiCorp on December 19, 2025,³⁵ received the CAP on January 30, 2026,³⁶ and issued the 2024 VMA Report on May 22, 2026.³⁷ The conclusions from the VMA Report are summarized in the table below.

Table 1: Summary of Energy Safety's Findings Regarding Completion of PacifiCorp's VM Initiatives in its 2023-2025 WMP for Performance Year 2024.

Vegetation Management Initiative	VMA Finding	VMA Report Finding
8.2.2. Vegetation Management Inspections	Deficient	Complete
8.2.3.1.2 Pole Clearing	Deficient	Deficient
8.2.3.1.1 Wood and Slash Management	Deficient	Deficient
8.2.3.2 Clearance	Deficient	Deficient
8.2.3.3 Fall-In Mitigation	Complete	Complete
8.2.3.4 Substation Defensible Space	Deficient	Complete

³³ Pub. Util. Code section 8386.3(b)(5)(A).

³⁴ WMP Technical Guidelines pages A-24 through A-26.

³⁵ VMA Report, Appendix 1.

³⁶ VMA Report, Appendix 2.

³⁷ VMA Report.

Vegetation Management Initiative	VMA Finding	VMA Report Finding
8.2.3.5 High-Risk Species	Deficient	Deficient
8.2.3.7 Fire Resilient Right-of-Ways	Complete	Complete
8.2.3.7 Emergency Response of Vegetation Management	Complete	Complete
8.2.4 Vegetation Management Enterprise System	Complete	Complete
8.2.5. Quality Assurance and Quality Control	Deficient	Deficient
8.2.6 Open Work Orders	Deficient	Deficient
8.2.7 Workforce Planning	Deficient	Complete

This APR reproduces the VMA Report conclusions, but rather than referencing each vegetation management initiative number it references the Utility Initiative Tracking ID to allow for consistency throughout the APR. Appendix B provides a crosswalk between the 13 Vegetation Management initiative numbers included in the VMA Report to the 16 Utility Initiative Tracking IDs included in this APR.

Observation

Energy Safety's VMA Report concluded that the method and urgency of PacifiCorp's execution of necessary corrective actions to address deficiencies in its VM program did not demonstrate a commitment to risk reduction and program maturity. In the 2024 performance year, PacifiCorp demonstrated that it either completed or achieved the objective of only seven of the 13 vegetation management initiatives in its WMP.

PacifiCorp did not complete six vegetation management initiatives: 8.2.3.1.1 Wood and Slash Management, 8.2.3.1.2 Pole Clearing, 8.2.3.2 Clearance, 8.2.3.5 High-Risk Species, 8.2.5. Quality Assurance and Quality Control, and 8.2.6 Open Work Orders. PacifiCorp's corrective actions did not address the deficiencies identified in the VMA Energy Safety will continue to review and inspect PacifiCorp's progress on its vegetation management program maturity. Energy Safety expects PacifiCorp to improve its vegetation management program and decrease risk on its system.

The specific findings from Energy Safety's VMA Report are summarized in Appendix B.

6.3 Energy Safety Field Inspection Assessment

Energy Safety regularly performs field audits of the WMP work reported as complete by the electrical corporations. Energy Safety's field audits provide empirical validation of the WMP work conducted by the EC, including whether the data on completed WMP work is accurate and therefore can be relied upon by the electrical corporation in understanding the effectiveness of its wildfire mitigation activities.

When performing a field audit, Energy Safety conducts two types of inspections: 1) inspections of grid hardening, vegetation management, and other work related to WMP initiatives, and 2) inspections of general wildfire safety (GWS) conditions at an inspection site. The second category of general wildfire safety conditions is not strictly related to WMP initiatives, and these inspections are additional to Energy Safety's WMP initiative-related inspection work.³⁸

Observation

As detailed below, Energy Safety's field inspections determined that PacifiCorp's initiative completeness data had inconsistencies in some 2024 WMP initiatives, which represent broader data management issues that PacifiCorp must address going forward.

6.3.1 Inspection and Notice Counts

For field audits of 2024 WMP work, inspections that found instances of non-performance on WMP initiative work resulted in a notice of violation or a notice of non-performance.³⁹ An overview of the location counts of inspections and notices by initiative appears in Table 2.

³⁸ If Energy Safety observes a general wildfire safety concern during an inspection activity, that is recorded as a "Wildfire Safety Concern." Or as it was known prior to 2024, a "defect."

³⁹ If Energy Safety observes non-performance of a WMP initiative during an inspection activity that an electrical corporation claimed to have occurred at a site, then that is recorded as a "deficiency" and may be the subject of a "Notice of Non-Performance" sent to the electrical corporation. Prior to SB 254, Energy Safety issued Notices of Violation, which could be issued due to completeness or data accuracy issues.

Table 2. Energy Safety Inspection Counts and Notices of Violation or Non-Performance, by Initiative

2024 WMP Initiative	Number of Inspections	Notices of Violation	Notices of Non-Performance	Total
Distribution Pole Replacement 8.1.2.3 GH-02	287	1 (Completeness)	0	1
Expulsion Fuse Replacement 8.1.2.12 GH-05	284	4 (2 Data Accuracy, 2 Completeness)	1 (Completeness)	5
Line Rebuild - Covered conductor installation 8.1.2.1 GH-01	104	1 (Data Accuracy)	0	1
Patrol Inspection – Distribution 8.2.2.1 VM-01	298	3 (Completeness)	0	3
Wood and Slash Management 8.2.3.1.1	N/A	1 (Completeness)	0	1

6.3.2 Data Accuracy and Completeness Issues Observed by Field Audits

As described above, Energy Safety issued 11 notices to PacifiCorp upon inspection of its 2024 WMP work. Of those 11 total notices, three were related to data accuracy issues and eight were related to completeness issues observed in the course of field audits.

Data accuracy issues can vary, but generally they are either: 1) instances where an electrical corporation reports WMP work as completed at a location where the reported work has not taken place, or 2) instances where the kind of WMP work reported as completed at a location did not take place, even if other types of work occurred there.

Completeness issues are instances where the WMP work claimed to have been completed at a location was done in an incomplete manner, and therefore should not have been counted by the electrical corporation as “complete” WMP work.

The existence of data accuracy or completeness issues in the spatial QDR submissions of an electrical corporation calls into question the reliability of the electrical corporation’s claimed completion of WMP work. For example, if an electrical corporation claims to have completed 100 units of a type of WMP work, but Energy Safety inspectors discover data accuracy and completeness issues with specific instances of the work reported, then the claim that 100 units were completed is unreliable.

In the case of PacifiCorp’s 2024 WMP work, Energy Safety’s field audits observed data accuracy and/or completeness issues with the work claimed as completed under the following WMP initiatives: Distribution Pole Replacement (GH-02), Expulsion Fuse Replacement (GH-05), Line Rebuild - Covered conductor installation (GH-01), Detailed Inspection-Distribution (VM-01), and Wood and Slash Management (8.2.3.1.1) (Table 3).

The table below also includes the numbers of points or miles inspected by Energy Safety for the 2024 WMP work reported by PacifiCorp as completed for each of the relevant WMP initiatives, and the number of points or miles with data accuracy or completeness issues. A percentage of the 2024 WMP work reported by PacifiCorp as complete with those issues is also described.

Table 3. Energy Safety Inspection Counts and Data Accuracy and Completeness Issues, with Percentage of Inspections Where Issues were Observed

Initiatives with Data Accuracy and Completeness Issues	Number of Points or Miles Inspected	Total Points or Miles with Issues	Percentage of Points or Miles with Issues
Distribution Pole Replacement (GH-02)	287	1	0.3%

Initiatives with Data Accuracy and Completeness Issues	Number of Points or Miles Inspected	Total Points or Miles with Issues	Percentage of Points or Miles with Issues
Expulsion Fuse Replacement (GH-05)	284	5	1.8%
Line Rebuild - Covered conductor installation (GH-01)	104	1	0.9%
Detailed Inspection-Distribution (VM-01)	298	3	1%
Wood and Slash Management (8.2.3.1.1)	0	1	0 ⁴⁰

The electrical corporation must demonstrate that it met its WMP targets. Because Energy Safety's field audit of PacifiCorp's 2024 WMP work observed issues with the geospatial data reported by PacifiCorp on initiative 2024 WMP work, the actual amount of 2024 WMP work reported as completed by PacifiCorp with respect to the above initiatives is somewhat unreliable (Table 4). However, this unreliability did not ultimately affect Energy Safety's determination that PacifiCorp met or did not meet their 2024 WMP targets with respect to these initiatives.

Table 4. Energy Safety Estimates of Data Accuracy and Completeness Issue Impacts on Reported WMP Compliance⁴¹

Initiatives with Data Accuracy and Completeness Issues	PacifiCorp 2024 WMP Target	Actual Points or Miles Completed as Reported by PacifiCorp ⁴²	Percentage of Points or Miles with Issues	Reliable Actual Points or Miles
Distribution Pole Replacement (GH-02)	1,600 poles	1,269 poles	0.3%	1,265 poles

⁴⁰ Energy Safety does not inspect this initiative activity directly because slash management, as an initiative, is applied to all vegetation management program activities.

⁴¹ Due to Energy Safety inspections being applicable to multiple initiatives concurrently, a reliability assessment on a per-initiative basis is not feasible for 2024.

⁴² 2024 Q4 QDR Spatial Data.

Initiatives with Data Accuracy and Completeness Issues	PacifiCorp 2024 WMP Target	Actual Points or Miles Completed as Reported by PacifiCorp ⁴²	Percentage of Points or Miles with Issues	Reliable Actual Points or Miles
Expulsion Fuse Replacement (GH-05)	500 Fuse Locations	1,261 Fuse Locations	1.8%	1,237 Fuse Locations
Line Rebuild - Covered conductor installation (GH-01)	80 Line miles	50.78 Line miles	0.9%	50.32 Line miles
Detailed Inspection-Distribution (VM-01)	875 inspections	1,744 miles	N/A ⁴³	1,726 miles
Wood and Slash Management (8.2.3.1.1)	8,017 locations	N/A	0	N/A

6.4 PacifiCorp WMP Objective and Initiative Attainment in 2024

An EC's WMP is assessed on the basis of whether it is feasible, cost efficient, demonstrates continued improvement and forward-looking progress, and reduces wildfire risk. An EC's ability to complete its initiative activities demonstrates its competence in and commitment to executing on that plan. Therefore, the findings regarding initiative attainment are at the heart of any WMP evaluation, in that they measure the EC's performance in implementing the wildfire risk reduction activities that the EC itself committed to do for the benefit of its customers and the people of California.

Energy Safety assessed 37 wildfire mitigation initiatives for 2024 WMP attainment performance and found that PacifiCorp missed nine initiative activity targets (24%). The nine initiative activities with missed targets from PacifiCorp's 2024 WMP are Line Rebuild-Covered Conductor Installation (GH-01), Installation of System Automation Equipment (GH-04), Wood and Slash Management (8.2.3.1.1), Fuels Management and Pole Clearing (VM-05), Clearance-Distribution and Transmission (8.2.3.2), High Risk Species, QA/QC of vegetation inspections

⁴³ Due to the difference in the initiative units in the WMP (inspections) and units reported geospatially as complete (miles), Energy Safety did not conduct an assessment for the percentage of points or miles with issues, or reliable actual points or miles.

(VM-11), Open Work Orders (8.2.6), and Community Outreach (CO-01). A complete list of the initiative activities with missed targets is shown in Table 5.

Some of PacifiCorp’s other missed initiative targets were related to grid hardening and vegetation management work intended to reduce risk on PacifiCorp’s system, and were also missed periodically during the 2020-2023 period. These included targets related to covered conductor installation, clearing vegetation around poles, wood and slash management, data governance, and community engagement. In fact, PacifiCorp failed to meet any of its annual covered conductor targets during the 2020 to 2024 period. This suggests a more systemic issue with PacifiCorp’s implementation of its WMP work generally that it must address. By missing these targets PacifiCorp failed to reduce risk on its system in the manner committed to its customers and the people of California through its WMP.

Section 6.4.1 elaborates on the financial impact of initiatives with missed targets on proposed expenditures, and Section 6.4.2 on the impacts of initiatives with missed targets on risk reduction, to measure the gap between PacifiCorp’s WMP and its implementation.

Observation

While PacifiCorp met targets for a majority of its 2024 WMP initiatives, as detailed below some of those missed targets were related to grid hardening and vegetation management activities that would have otherwise reduced risk on PacifiCorp’s system in the manner PacifiCorp committed to its customers and the people of California, and are part of a multi-year trend of missing several different WMP initiatives.

Table 5. PacifiCorp WMP Initiatives with Missed Targets⁴⁴

Not Attained PacifiCorp 2024 WMP Initiative	2024 WMP Initiative Target	Actual Performance
Line Rebuild-Cover Conductor Installation (GH-01)	Target: 80 Line Miles	Installed 72 Line Miles
Installation of System Automation Equipment (GH-04)	Target: 20 devices	Installed eight devices

⁴⁴ 2024 WMP, pages 134-137,185-187, 215, 253, 268-269.

Not Attained PacifiCorp 2024 WMP Initiative	2024 WMP Initiative Target	Actual Performance
Wood and Slash Management (8.2.3.1.1)	Target: Debris management (chipping removing, recycling slash)	PacifiCorp did not provide documentation to substantiate the removal of wood and slash debris generated from vegetation management activities.
Fuels Management and Pole Clearing (VM-05)	Target: 3,126 Poles brushed in local responsibility area (LRA) HFTD areas	Completed 1,018 poles brushed in LRA HFTD areas
High Risk Species	Target: Performing additional pruning for at-risk species with fast growth rates.	PacifiCorp did not provide information to demonstrate that it inspects and remediates high risk species.
Clearance-Distribution and Transmission (VM-06, VM-07)	Target: Cycle-based maintenance coupled with annual patrol and corrective maintenance. Increased clearance distances based on tree growth rate. Increased clearance distances based on tree physical structure.	PacifiCorp did not provide sufficient documentation to support the completion of all work associated with 8.2.3.2 Pruning Beyond Minimum Required Clearances, including expanded clearance distances based on tree growth rates and tree physical structure.
Quality Assurance and Quality Control (VM-11)	Target: Identifying and assigning work exceptions to its contractors responsible for any corrective action.	PacifiCorp did not provide sufficient documentation to support the completion of its commitments related to 8.2.5 Corrective Actions.
Open Work Orders (8.2.6)	Target: 1)Vegetation work completed 1-6 weeks after inspection. 2) Link prescribed and	PacifiCorp did not complete 39% of work orders within six weeks of inspection.

Not Attained PacifiCorp 2024 WMP Initiative	2024 WMP Initiative Target	Actual Performance
	completed prescriptions.	
Community Outreach (CO-01)	Target: 1) 55% or more of the sample survey respondents are aware of wildfire safety communications 2) PacifiCorp remains the most mentioned source of communication about wildfire preparedness. 3) Access and Functional Needs (AFN) resources one additional language for the medical certificate.	PacifiCorp did not complete the medical certificate application in another language.

6.4.1 Impact of Initiatives with Missed Targets on Proposed Expenditures

Energy Safety uses the magnitude of funding proposed for a given WMP initiative as one way of gauging the impact of a missed initiative relative to the larger suite of WMP work. This analysis proceeds from the assumption that the greater the proposed expenditure for a WMP initiative, the greater importance that initiative has to the EC’s overall plan for wildfire risk reduction. Note that this financial analysis does not attempt to quantify the risk reduction impact of a WMP initiative.

Energy Safety quantified the financial importance of PacifiCorp’s 2024 WMP initiatives with missed targets. For this assessment, Energy Safety created three different perspectives of financial importance:

- 1. Relative magnitude of proposed expenditures for initiatives with missed targets to the overall 2024 WMP;
- 2. Percentage of the proposed expenditures for the initiatives with missed targets that was spent; and
- 3. Of the ten largest initiatives by proposed expenditures, the number of initiatives that had missed targets.

The total amount budgeted for the nine initiative activities with missed targets was approximately \$83 million, or 89% of the approximate \$92.4 million allocated in the 2024 WMP budget.

Of the \$83 million budgeted for the initiatives with missed targets, approximately \$147.5 million was spent (177%).

Energy Safety found that of the 10 largest initiatives by proposed expenditure, three missed their targets and represented a budgeted amount of \$83 million, or 95%, of the \$88 million allocated for these 10 initiatives in 2024. These three initiatives and their proposed budgets appear below:⁴⁵

- Line Rebuild-Covered Conductor Installation (GH-01) - \$62.3 million.
- Installation of System Automation Equipment (GH-04) - \$5 million.
- Clearance-Distribution and Transmission (VM-06 and VM-07) - \$16.9 million.

Observation

PacifiCorp spent more than proposed on missed initiatives in 2024 by a significant amount (actual expenditure on missed initiatives was approximately 156% of the proposed amount). When viewed together with year-over-year trends in missing some of the same initiatives, such as covered conductor installation, this financial performance suggests that PacifiCorp needs to improve project planning for its WMP work.

See the table in Appendix A for a complete list of initiatives and their proposed and actual expenditures.

6.4.2 Impact of Initiatives with Missed Targets on Risk Reduction

Energy Safety's WMP Technical Guidelines require an electrical corporation to estimate the relative risk impact of its mitigation activities by subtracting the remaining risk after the mitigation activity is completed from the risk that existed before the mitigation activity occurred.⁴⁶ The electrical corporation is then to divide the risk difference by the risk before the mitigation activity, and finally, multiply the divided number by 100.⁴⁷

PacifiCorp's missed initiative targets did not have a quantified risk reduction assigned to it in the 2024 WMP, despite the requirements of the WMP Technical Guidelines.⁴⁸ For this reason, Energy Safety was unable to calculate an amount of quantified risk reduction that was not achieved by PacifiCorp due to the failure to meet its targets.

⁴⁵ 2024 Q4 QDR, Table 11.

⁴⁶ WMP Technical Guidelines, page 41.

⁴⁷ WMP Technical Guidelines, page 41.

⁴⁸ 2024 WMP, page 67.

However, the 2024 WMP did provide the following narrative descriptions for the following initiative types:

For vegetation management, PacifiCorp noted:

- The purpose of slash management is to reduce the volume of available fuel within the right-of-way.⁴⁹
- The purpose of pole clearing is to, reduce the risk of fire ignition if sparks are emitted from electrical equipment.⁵⁰
- The purpose of clearance is to increase overhang clearances to reduce the potential for faults due to overhang.⁵¹
- The purpose of managing high risk species is because they pose an elevated risk of electrical contact.⁵²
- The purpose of QA/QC is to identify exceptions that pose an imminent safety or reliability risk.⁵³

For grid hardening, PacifiCorp noted, “[i]n general, grid hardening programs attempt to reduce the occurrence of events involving the emission of sparks (or other forms of heat) from electrical facilities or reduce the impact of an existing wildfire on utility infrastructure.”⁵⁴

For community outreach, PacifiCorp noted, “[t]he company’s particular areas of focus in 2023 include enhancing data analytics and modeling capabilities, evaluating technologies and efficacy studies to assess wildfire mitigation strategies and PSPS risk, and enhancing PSPS preparedness.”⁵⁵

Observation

While neither the 2024 WMP nor the EC ARC quantified the expected risk reduction from PacifiCorp’s missed initiative targets, the narrative descriptions of the intent of the initiatives in the 2024 WMP makes clear that there was some expected risk reduction that would result from the work. By not meeting the target for these initiatives, PacifiCorp did not achieve as much risk reduction as planned. Therefore, this report concludes that one of PacifiCorp’s missed 2024 WMP targets led to less risk reduction than PacifiCorp committed to its customers and the people of California in its 2024 WMP.

⁴⁹ 2024 WMP, page 200.

⁵⁰ 2024 WMP, pages 201-202.

⁵¹ 2024 WMP, page 202.

⁵² 2024 WMP, page 204.

⁵³ 2024 WMP, page 208.

⁵⁴ 2024 WMP, page 139.

⁵⁵ 2024 WMP, page 296.

6.5 PacifiCorp 2024 WMP Expenditure Assessment

Energy Safety conducted an expenditure assessment to estimate PacifiCorp's spending alignment with its 2024 WMP. Unlike the assessment of the impact of initiatives with missed targets on proposed expenditures, this assessment considers all 2024 WMP initiatives and focuses on the gap between proposed and actual spending, as stated in the WMP. In addition, Energy Safety's assessment identifies spending deviations exceeding 10%, assessing how they impact PacifiCorp's planned spending variance.

This analysis is intended to provide an assessment of the EC's project management capabilities as they relate to financial management, which in turn provides insight into the EC's ability to responsibly utilize ratepayer funds dedicated to its WMP work.⁵⁶

According to PacifiCorp's Q1 QDR, it budgeted \$116.7 million for 37 2024 WMP initiatives, representing 38% of PacifiCorp's total budget for wildfire mitigation for the 2023-2025 period. Proposed and actual expenditures may differ across the EC ARC, IE ARC, and Energy Safety's assessment as the EC ARC and the IE ARC may include financial amounts for initiatives that have no activity targets. The EC ARC reported \$165.7 million (179%) spent of \$92.3 million proposed. The IE ARC reported \$166.5 million (180%) spent of \$92.4 million proposed. Energy Safety's assessment aligned with that of the IE ARC and concluded that \$166.5 million (180%) was spent of \$92.4 million proposed. This financial performance suggests that PacifiCorp needs to improve project planning and budgeting processes for its WMP work, particularly its work on covered conductor.

Observation

Energy Safety analyzed PacifiCorp's expenditures on individual 2024 WMP wildfire mitigation initiatives and found that 62% (23 out of 37 initiatives) of the initiatives had actual expenditures that deviated more than 10% from those proposed.

See the table in Appendix A for a complete list of initiatives and their proposed and actual expenditures.

6.6 Initiative Performance Observations and Conclusions

Section 6 of this report demonstrates that PacifiCorp missed several of its 2024 WMP initiative activity targets, and that this failure reduced PacifiCorp's ability to reduce risk on its system

⁵⁶ See Pub. Util. Code section 8386.3(c)(1) regarding the prohibition of diverting wildfire mitigation funds.

in 2024 compared to what it committed to its customers and the people of California in its 2024 WMP.

Energy Safety made several observations above regarding the impact of PacifiCorp's 2024 initiative performance, which are:

- Energy Safety's VMA cited as PacifiCorp not completing nine out of 13 vegetation initiatives. After receiving PacifiCorp's CAP, Energy Safety identified six initiatives as incomplete in the VMA Report, noting the overall initiative as being deficient for the 2024 calendar year. The most prevalent finding with these deficient initiatives was PacifiCorp's inability to provide documentation to support work completed.
- Energy Safety field inspectors found inaccuracies with PacifiCorp's reporting for expulsion fuse replacements, distribution pole replacements, and vegetation clearing at poles.
- PacifiCorp did not complete 35% of its planned initiative activities for 2024, including initiatives related to covered conductor installation, system automation, and numerous vegetation initiatives, which were intended to remove risk from PacifiCorp's system in 2024.
- PacifiCorp spent more than proposed on missed initiatives in 2024 by a significant amount (actual expenditure on missed initiatives was approximately 177% of the proposed amount). When viewed together with year-over-year trends in missing some of the same initiatives, such as covered conductor installation, this financial performance suggests that PacifiCorp needs to improve its budgeting processes and project planning for its WMP work.

Energy Safety remains committed to an open and collaborative approach to reducing wildfire risk in California. In order to achieve this goal, it is important that PacifiCorp effectively implement its own plan for wildfire risk reduction.

7. Ignition Risk Performance

Energy Safety requires electrical corporations to report data, such as ignitions, that help Energy Safety assess whether an electrical corporation is reducing its wildfire risk over time while also reducing its reliance on PSPS events. In order to consistently analyze these data between years and between ECs, Energy Safety uses a set of quantitative ignition risk performance metrics, as follows:⁵⁷

⁵⁷ Data for all figures in this section utilize a combination of PacifiCorp's response to DR-283 and PacifiCorp's data from the QDRs. Priority is given to the data request if both are available. Otherwise, 2015-2021 data are sourced from Q3 2022 QDR, 2022-2023 data are sourced from the Q4 2023 QDR, and 2024 data are sourced from the relevant quarter's QDR (e.g., Q1 2024 data sourced from the Q1 2024 submission, Q2 2024 data sourced from the Q2 2024 submission, etc...).

- **Direct Metric - Ignition Rates:** This report defines ignitions as incidents in which electrical corporation infrastructure contributed to an ignition.⁵⁸ PacifiCorp reports its total number of ignitions to Energy Safety on a quarterly basis.
- **Proxy Metric - Wire Down Event Rate:** This report defines wire down events as incidents in which overhead electrical lines fall to the ground, land on objects, or become disconnected from their moors. PacifiCorp reports its total number of wire down events to Energy Safety on a quarterly basis.
- **Proxy Metric – Outage Event Rate:** This report defines outages as all unplanned outages experienced in PacifiCorp’s territory. PSPS outages are not included. PacifiCorp reports its total amount of outages to Energy Safety on a quarterly basis.

For this report, Energy Safety estimates PacifiCorp’s ignition risk performance metrics for the calendar years 2017 through 2024, with particular attention to the 2024 outcomes and, when possible, examining the causes for these.

For direct and proxy performance metrics, Energy Safety converted the metric counts into rates by dividing them by PacifiCorp’s Overhead Circuit Miles (OCM). These rates for ignition risk events add nuance to the assessment and allow for comparisons across the ECs.

To see the raw counts of all ignition risk events and OCM values for each year used, see Appendix C.

7.1 Ignition Rates

Ignition rates are the most direct measure of wildfire risk performance. There are limitations to only using ignition rates, however, due to the relatively small size of the dataset relative to other indications of risk, such as wires down and unplanned outages. As a result, this analysis of PacifiCorp’s ignitions over time should be read in concert with the other metrics to give a full picture of an EC’s performance over time.

Ignition Rates per Overhead Circuit Mile

To account for concurrent overhead grid expansion within PacifiCorp’s territory and allow for comparisons with other utilities, ignitions normalized by overhead circuit miles (OCM) are provided as a rate of ignitions per 1,000 miles and delineated by HFTD Tier 3, HFTD Tier 2, and Non-HFTD Areas.

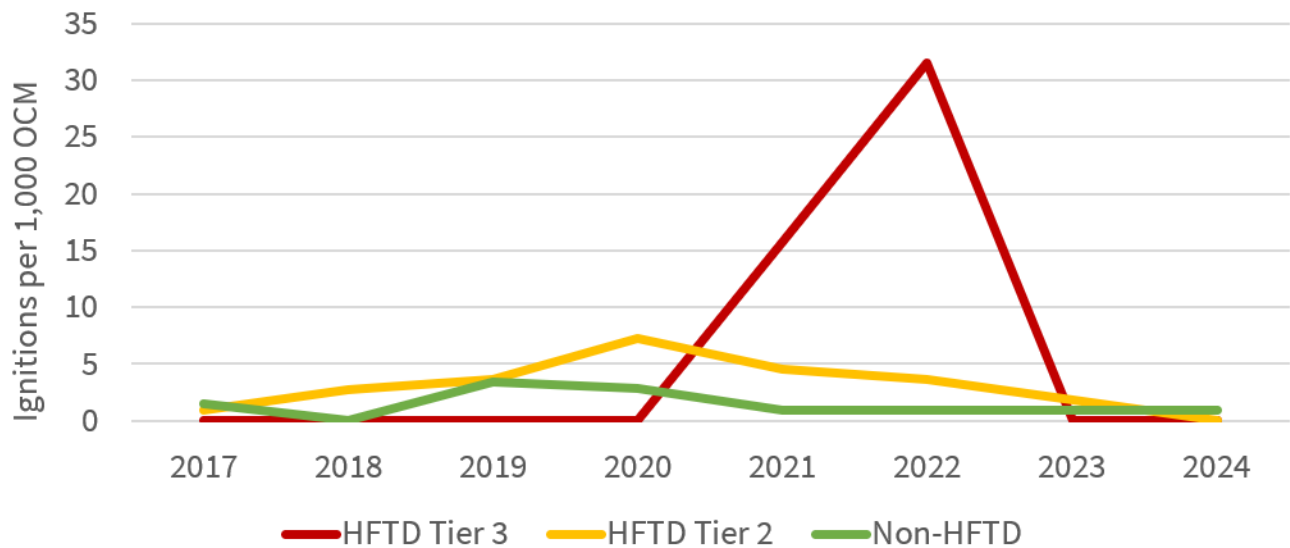
For this analysis, ignitions in HFTD Tier 3 drove the most significant activity across the 2017–2024 study period, reaching its peak in 2022 at approximately 31 ignitions per 1,000 OCM before declining sharply to near zero by 2024. HFTD Tier 2 recorded moderate and variable

⁵⁸ The term “ignition,” utilized by Energy Safety, is one that meets all the following criteria: 1) a self-propagating fire of material other than electrical and/or communication facilities, 2) the resulting fire traveled greater than one linear meter from the ignition point, and 3) the EC has knowledge that the fire occurred.

activity throughout the period, peaking at approximately seven ignitions per 1,000 OCM around 2019–2020 before gradually subsiding through 2024, while non-HFTD ignition rates remained consistently low at or approximately near one ignitions per 1,000 OCM for the entirety of the period (Figure 2).

For a plot of ignition event raw counts, see Appendix C.

Figure 2. PacifiCorp Ignitions per OCM (2017-2024) by HFTD Tier

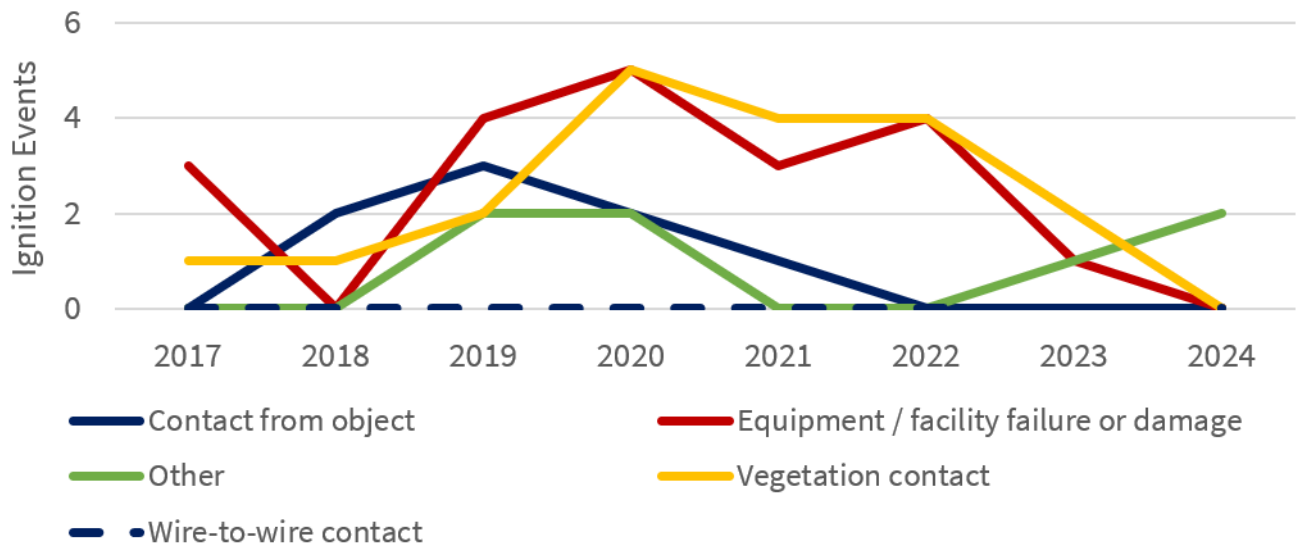


Raw Ignitions by Risk Driver

PacifiCorp's data shows the two most prevalent causes of ignition from 2018-2024 were 1) vegetation contact, and 2) equipment or facility failure or damage. Vegetation contact and equipment or facility failure or damage both peaked in 2020 at approximately five ignition events — the single highest annual value recorded across all cause categories in the 2017–2024 period. Ignitions from both vegetation contact and equipment or facility failure or damagerisk drivers declined to zero in 2024. Risk drivers for contact from object and “Other”

recorded minimal activity, and wire-to-wire contact remained at zero throughout the 2017–2024 period. (Figure 3).

Figure 3. PacifiCorp Ignition Events Delineated by Risk Driver

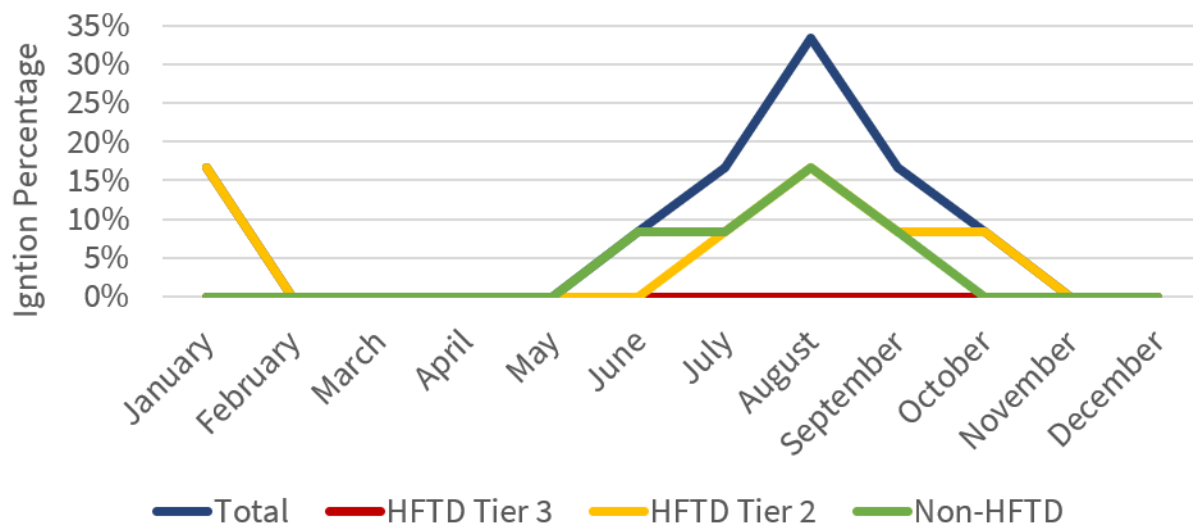


Ignition Events Organized by Month and HFTD Tier for the 2022-2024 Period

Energy Safety estimated where, by HFTD tier, and when, by month of the year, ignition events recently occurred. The last three years (2022-2024) of events are averaged to account for noise in the sparse event data. In order to show the relative contribution of each HFTD tier, Energy Safety divided the 3-year average number of events for each month within each HFTD tier by the 3-year average number of all events for the year.

According to the assessment conducted, PacifiCorp's ignition activity is heavily concentrated within the June through October, with total ignitions peaking in August at approximately 33% of annual events. Non-HFTD and HFTD Tier 2 ignitions each contributed approximately 17 percent of annual events in August, together accounting for the August peak. HFTD Tier 2 demonstrated the widest monthly distribution, with activity recorded in January at approximately 17% and from July through October. HFTD Tier 3 recorded zero ignitions across all months (Figure 4).

Figure 4. PacifiCorp 3-Year Average (2022-2024) of Monthly Ignition Events by HFTD Tier



7.2 Wire Down Event Rates

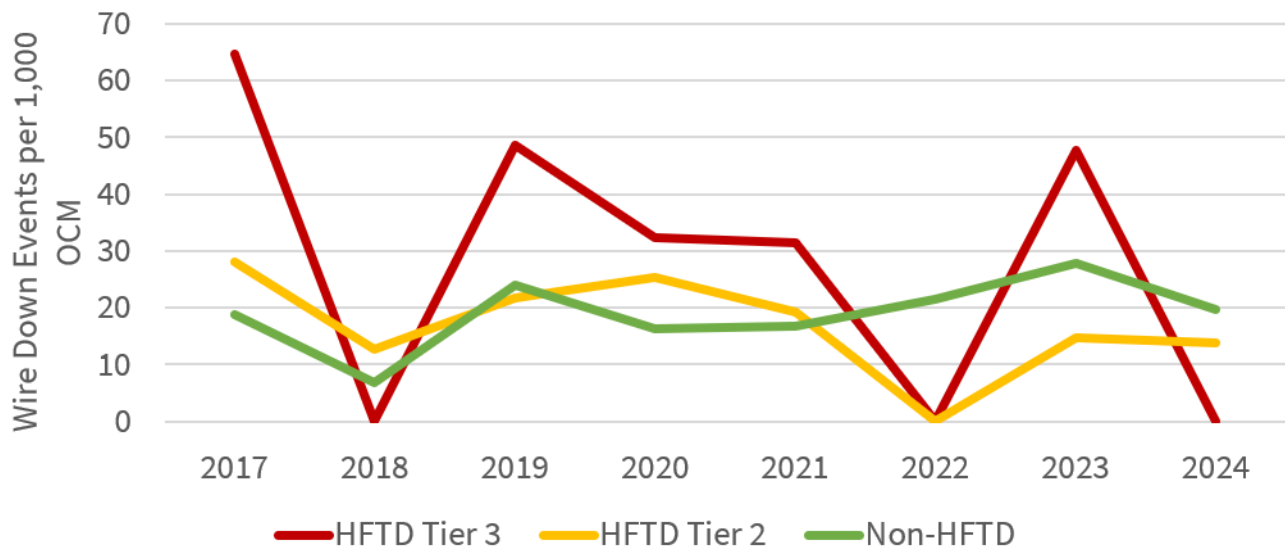
Wire down events are wildfire risks where a wire is touching the ground, touching an object, or has become disconnected from its mooring. This type of event poses a risk of ignition or a danger to people if that wire is also energized with electricity, and therefore is tracked by Energy Safety in its Annual Performance Reports as a proxy metric for ignition risk.

Wire Down Events per Overhead Circuit Mile

To account for concurrent overhead grid expansion within PacifiCorp's territory and allow for comparisons with other utilities, wire down events normalized by overhead circuit miles (OCM) are provided as a rate of wire down events per 1,000 miles and delineated by HFTD Tier 3, HFTD Tier 2, and Non-HFTD Areas.

For the period of 2017-2024, HFTD Tier 3 recorded the highest normalized wire down rate, peaking in 2017 at approximately 65 events per 1,000 OCM. HFTD Tier 3 continued to experience wire down events over time with secondary peaks in 2019 and 2023 at approximately 49 and 48 events per 1,000 OCM, respectively. However, in 2024, no wire down events occurred. HFTD Tier 2 followed a similar pattern, but at a lower rate often below 30 events per 1,000 OCM (Figure 5).

For wire down event counts, see Appendix C.

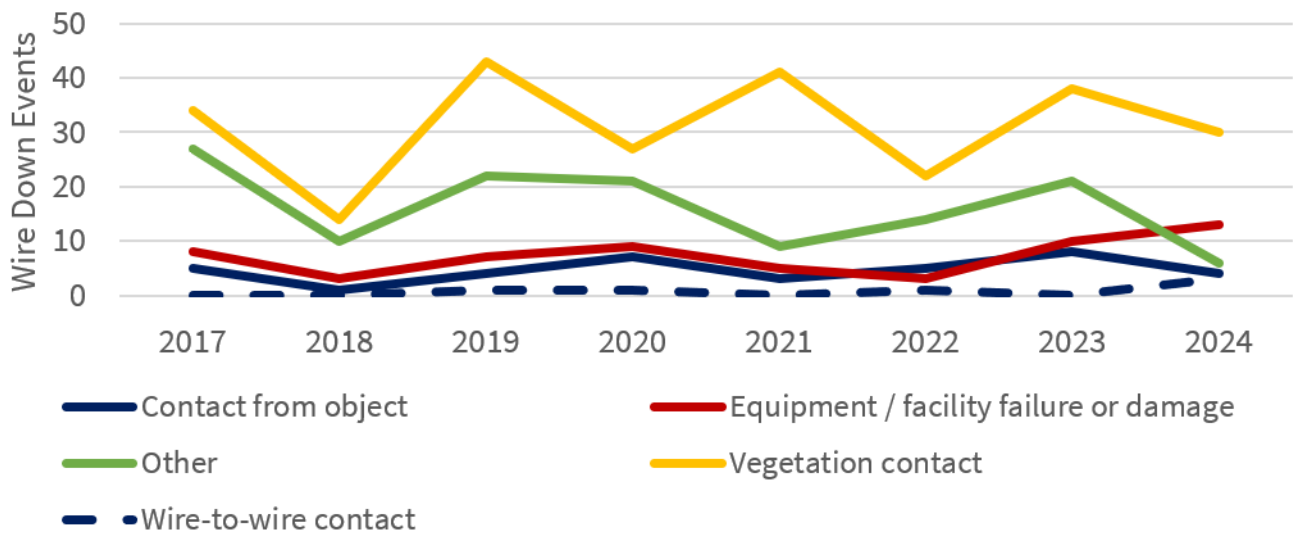
Figure 5. PacifiCorp Wire Down Events per OCM (2017-2024) by HFTD Tier

Raw Wire Down Events by Risk Driver

PacifiCorp wire down event counts are shown delineated by risk drivers to indicate which causes are the most common (Figure 6).

Vegetation contact was the dominant driver of wire down events across the 2017–2024 period, consistently recording the highest annual counts and peaking at approximately 43 events in 2019 before declining to approximately 30 events in 2024. The “other” category ranked second in volume, peaking at approximately 27 events in 2017 before declining to approximately six events in 2024. Equipment or facility failure or damage increased overall from approximately eight events in 2017 to approximately 13 in 2024, while contact from object remained comparatively low throughout the period. Wire-to-wire contact was negligible across all years.

Figure 6. PacifiCorp Wire Down Events Delineated by Risk Driver

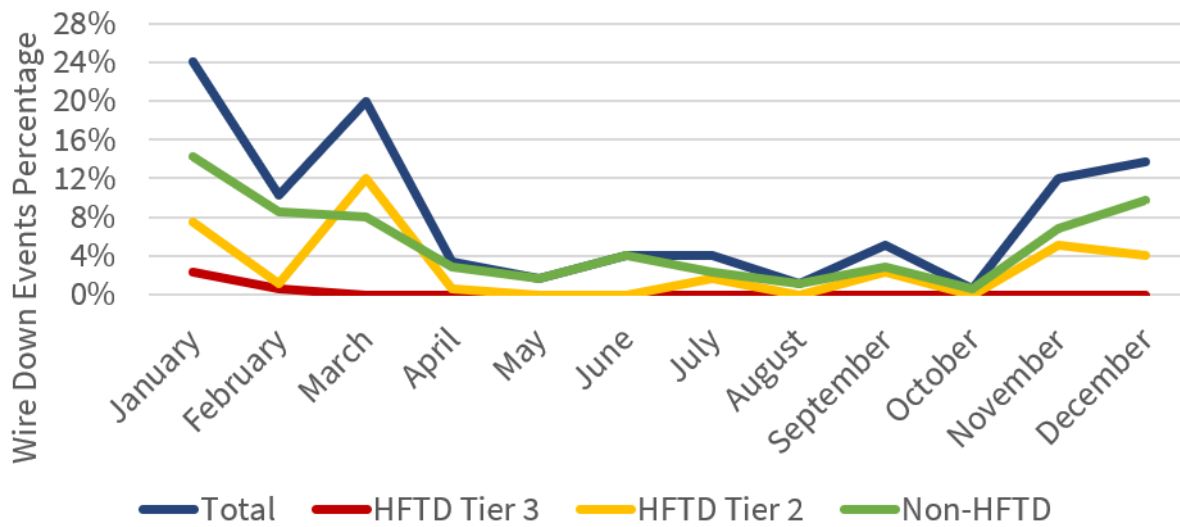


Wire Down Rates Organized by Month and HFTD Tier for the 2022-2024 Period

Energy Safety estimated where, by HFTD tier, and when, by month of the year, wire down events recently occurred. The last three years (2022-2024) of events are averaged to account for noise in the sparse event data. In order to show the relative contribution of each HFTD tier, Energy Safety divided the 3-year average number of events for each month within each HFTD tier by the 3-year average number of all events for the year.

According to the assessment conducted, wire down events for the 2022–2024 period, the highest average percentage of wire down events has occurred between January and March. The percentage decreases substantially in April and generally remains at a lower level through October, before increasing again in November and December. Wire down events within HFTD Tier 3 remained consistently low throughout the year, while HFTD Tier 2 and Non-HFTD areas generally followed the overall monthly trend, with higher percentages occurring during at the beginning and end of the year. The pronounced concentration of wire down activity November-February — outside of the traditional fire season window — stands in contrast to the spring and fall ignition-risk periods identified in the monthly ignition analysis, indicating that wire down risk for PacifiCorp is most acute and is driven predominantly by Non-HFTD and HFTD Tier 2 infrastructure (Figure 7).

Figure 7. PacifiCorp 3-Year Average (2022-2024) of Monthly Wire Down Events by HFTD Tier



7.3 Outage Event Rates

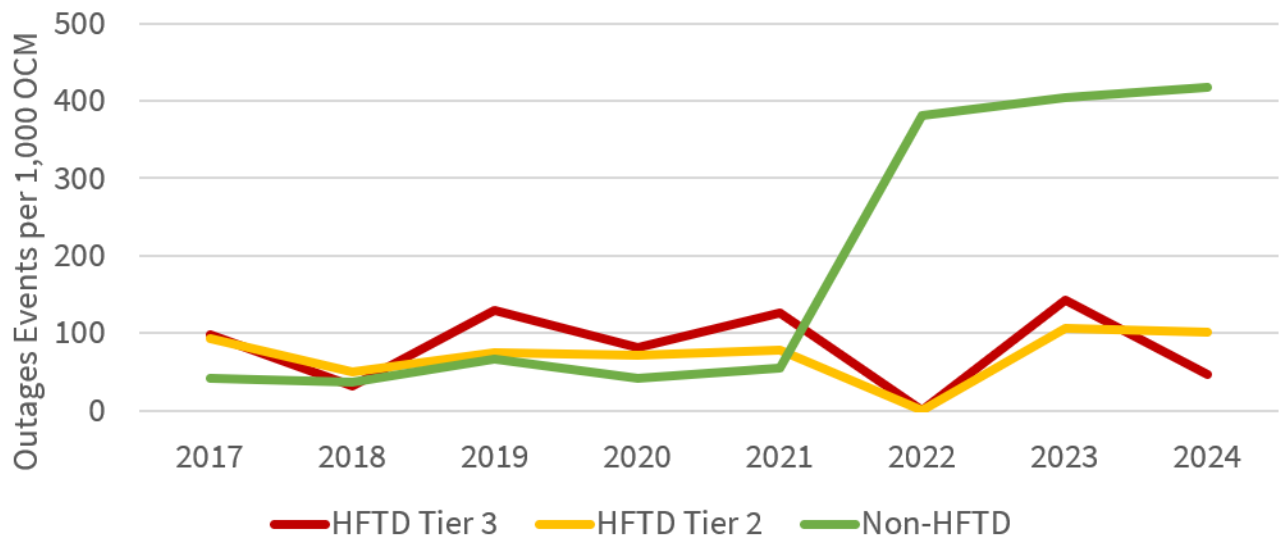
Power outages (outages) are unplanned power outage events (i.e., do not include PSPS events) tabulated by circuits and not by number of customers impacted. Outage events are tracked as outcomes that both may cause ignitions and impact a customer's quality of life.

Outage Events per Overhead Circuit Mile

To account for concurrent overhead grid expansion within PacifiCorp's territory and allow for comparisons with other utilities, outages normalized by overhead circuit miles (OCM) are provided as a rate of outages per 1,000 miles and delineated by HFTD Tier 3, HFTD Tier 2, and Non-HFTD Areas.

For the period of 2017-2024, Non-HFTD areas exhibited the most frequent outage events per 1,000 OCM, increasing from approximately 37–66 events per 1,000 OCM through 2021 to approximately 382 events per 1,000 OCM in 2022 and remaining elevated through 2024 at approximately 417 events per 1,000 OCM. HFTD Tier 3 and Tier 2 followed similar patterns to each other throughout the 2017–2024 study period, remaining relatively consistent from 2017 through 2021, declining to zero in 2022, and increasing again in 2023. (Figure 8).

For outage event counts, see Appendix C.

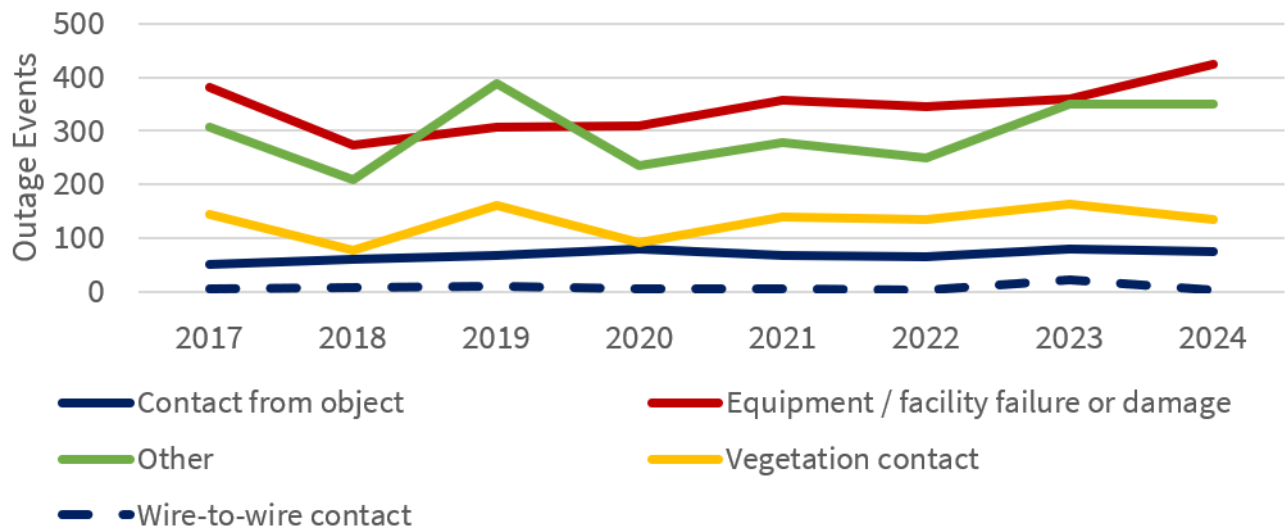
Figure 8. PacifiCorp Outages per OCM (2017-2024) by HFTD Tier

Raw Outage Events by Risk Driver

PacifiCorp outages are shown delineated by risk drivers to indicate which causes are the most common (Figure 9).

Equipment or facility failure or damage and the “other” category accounted for the largest share of outage events across the 2017–2024 period, collectively representing approximately 76% of annual outage events. Equipment or facility failure or damage peaked in 2024 at approximately 423 events, its highest level during the 2017–2024 period. The Other category peaked in 2019 at approximately 389 events and remained elevated through 2024 at approximately 350 events. Vegetation contact remained a comparatively lower contributor, ranging from approximately 76 to 162 events annually, while contact from object and wire-to-wire contact remained comparatively low throughout the period.

Figure 9. PacifiCorp Outage Events Delineated by Risk Driver

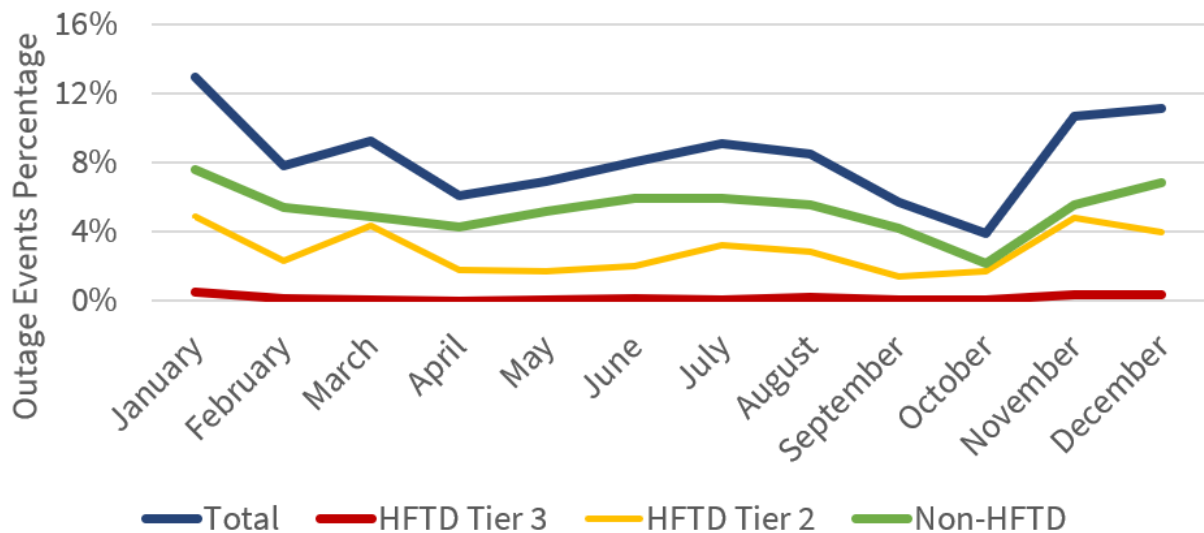


Outage Events Organized by Month and HFTD Tier for the 2022-2024 Period

Energy Safety estimated where, by HFTD tier, and when, by month of the year, outage events recently occurred. The last three years (2022-2024) of events are averaged to account for noise in the sparse event data. In order to show the relative contribution of each HFTD tier, Energy Safety divided the 3-year average number of events for each month within each HFTD tier by the 3-year average number of all outage events for the year.

According to the assessment conducted, the three-year monthly average percentage of outage events peaked in January at approximately 13%, with a secondary increase in November and December at approximately 11%. Outage event percentages generally remained between approximately 6% and 9% throughout the summer months of June through September, with fluctuations occurring during the remaining months. Non-HFTD areas were the largest contributor to PacifiCorp's total outages, with HFTD Tier 2 about half the Non-HFTD rate, and HFTD Tier 3 remaining comparatively low throughout the year (Figure 10).

Figure 10. PacifiCorp 3-Year Average (2022-2024) of Monthly Outage Events by HFTD Tier



8. Public Safety Power Shutoff Event Performance

PSPS events are planned outages that may be used as a wildfire mitigation tool during extreme fire conditions, particularly hot, dry, and windy days. While useful as a wildfire mitigation measure, PSPS events carry their own risks and adverse impacts on customers – particularly vulnerable customers who rely on electricity. As such, electrical corporations take mitigating actions to reduce the frequency, scope, duration, and impacts of PSPS events.

Energy Safety collects data from the ECs on their PSPS events and tracks their PSPS performance on a year-over-year basis. The purpose of this analysis is to monitor and publicize the impacts of an EC's PSPS performance. This analysis does not make any judgment about the reasonableness of the decision to employ PSPS.

The following four PSPS event parameters are assessed by year and comprise the main components of the PSPS event performance assessment:

- *Scope* is measured as the total number of utility circuits impacted because of all PSPS events,
- *Duration - Customer* is measured by the total number of customer-hours because of all PSPS events,

- *Duration - Critical Infrastructure is measured as the total number of critical infrastructure-hours affected by PSPS events;⁵⁹ and*
- *Impact is measured as the total number of customers affected by PSPS events.*

Energy Safety converted the event parameters into rates by dividing them by PacifiCorp's PPS frequency, measured as the count of all PPS events. These rates for PPS event parameters measure the performance of EC PPS event management and account for year-to-year variances in weather. They reflect the performance of the PPS events once they have occurred.

To estimate when PPS events typically occur throughout the year, the PPS events by month for the years 2022 – 2024 have been averaged.

The data source for PPS event parameters information is the QDRs.⁶⁰

To see the raw counts of all PPS event parameters and PPS frequency for each year used, see Appendix C.

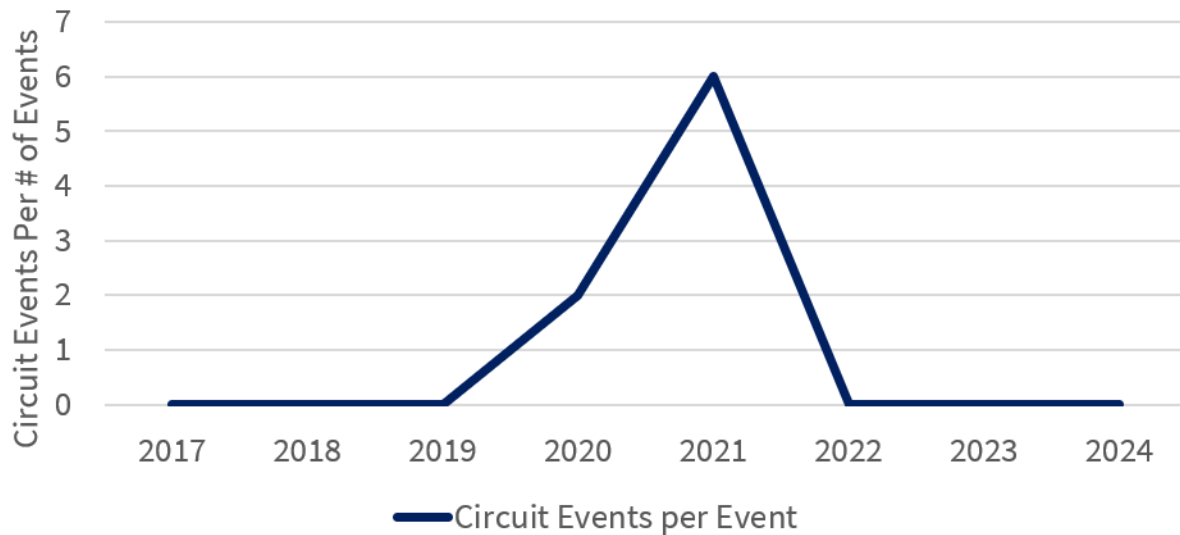
⁵⁹ The term "critical infrastructure hours" means the total number of hours that critical infrastructure was impacted by PPS events. Energy Safety's 2024 Compliance Guidelines (which were effective during the 2024 performance period) defines critical infrastructure as structures that are: chemical, communication, educational, emergency services, energy, government facilities, healthcare and public health, public safety answering points, transportation, water and wastewater systems, and other.

⁶⁰ 2022 Q3 QDR, Table 11; 2023 Q4 QDR, Table 10; 2024 Q4 QDR, Table 10.

Scope of PSPS Events

Based on information provided by PacifiCorp, the rate of circuits impacted by PSPS events was most pronounced in 2021, reaching approximately six circuit events per PSPS event — the highest value recorded across the 2017–2024 period — before declining to zero in 2022–2024 (Figure 11).

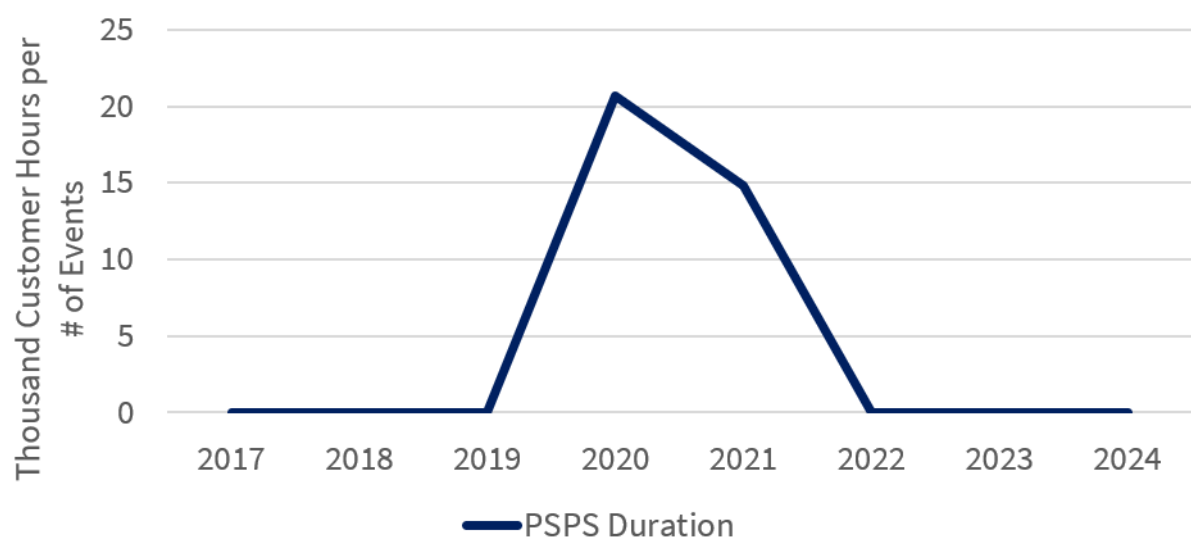
Figure 11. PacifiCorp PSPS Event Scope per Event (2017-2024)



Duration-Customers of PPS Events

Based on information provided by PacifiCorp, the rate of customer-hours impacted per event was most pronounced in 2020, reaching approximately 21 thousand customer hours per PPS event — the highest value recorded across the 2017–2024 period — before declining to approximately 15 thousand customer hours per PPS event in 2021 and dropping to zero in 2022–2024 (Figure 12).

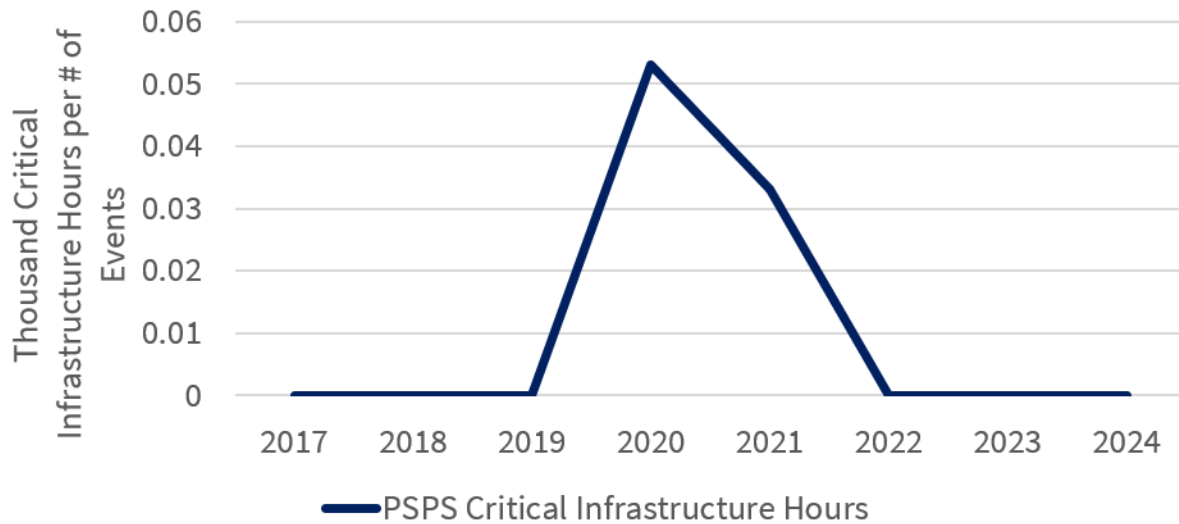
Figure 12. PacifiCorp PPS Event Duration-Customers per Event (2017-2024)



Duration- Critical Infrastructure of PSPS Events

Based on information provided by PacifiCorp, the duration of PSPS Events on critical infrastructure hours per event was most pronounced in 2020, reaching approximately 53 critical infrastructure hours per PPS event — the highest value recorded across the 2017–2024 period — before declining to approximately 33 critical infrastructure hours per PPS event in 2021 and dropping sharply to zero in 2022–2024 (Figure 13).

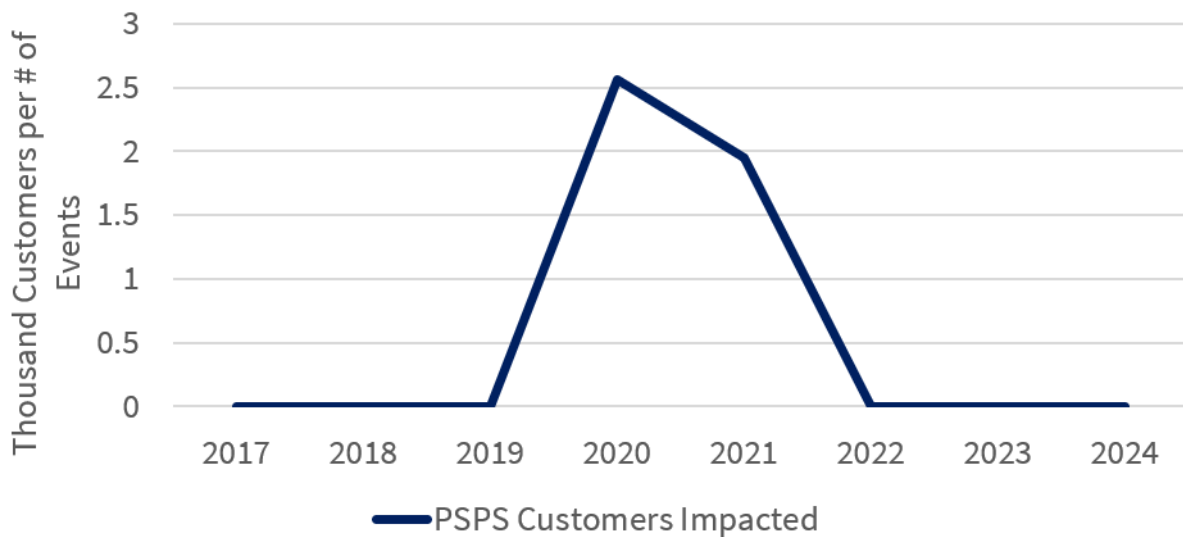
Figure 13. PacifiCorp PPS Event Duration - Critical Infrastructure per Event (2017-2024)



Customers Impacted by PSPS Events

Based on information provided by PacifiCorp, the rate of PSPS event impacts on the number of customers per event was most pronounced in 2020, reaching approximately 2,560 customers per PSPS event — the highest value recorded across the 2017–2024 period — before declining to approximately 1,950 thousand customers per PSPS event in 2021 and dropping to zero in 2022–2024 (Figure 14).

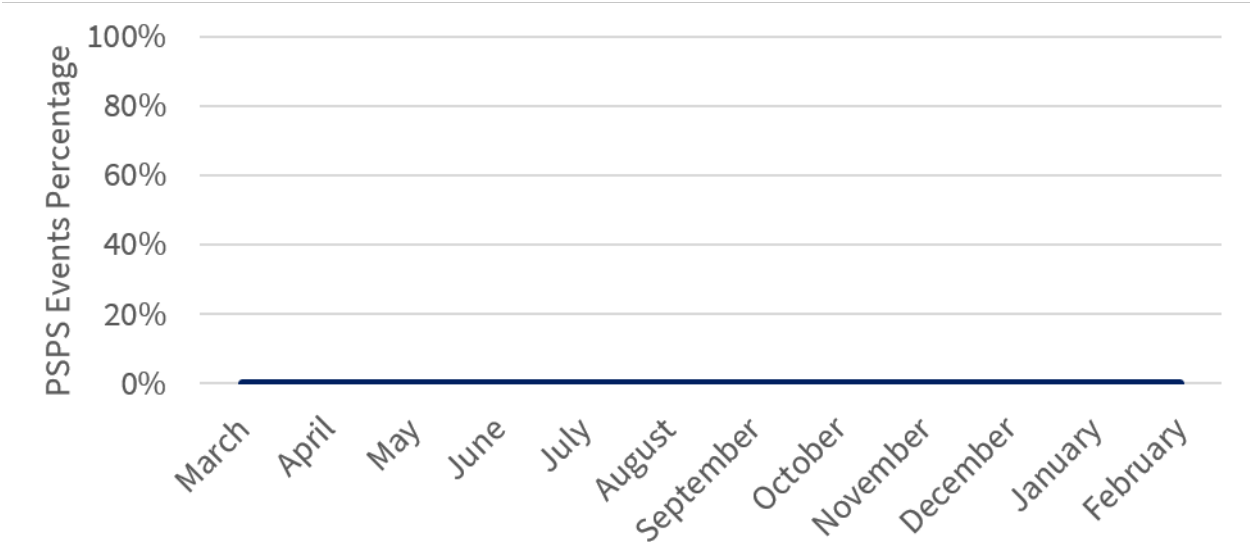
Figure 14. PacifiCorp PSPS Event Impacts on Number of Customers per Event (2017-2024)



PSPS Events Organized by Month for the 2022-2024 Period

Energy Safety conducted a separate assessment to identify when PSPS events have occurred during the last three years. To do so, Energy Safety estimated PacifiCorp’s monthly 3-year average count of PSPS event percentages for the 2022-2024 period (Figure 15). According to the assessment conducted, PacifiCorp recorded no PSPS events during the 2022–2024 averaging period, resulting in no monthly distribution of PSPS activity to report for this figure.

Figure 15. PacifiCorp 3-Year Average (2022-2024) Monthly PSPS Event Percentages



9. Outcome Metric Performance

Energy Safety collects data from the ECs regarding the consequences, or outcomes, of the ignitions caused by their equipment each year. Tracking these data over time allows for year-to-year assessment of the risk presented to the public by ignitions caused by the EC.

This section presents outcome performance metrics on electrical corporation-related wildfires including:

1. *Acres burned* – The total number of acres burned due to electrical corporation caused fires;
2. *Structures damaged/destroyed* - The total number of structures damaged or destroyed due to electrical corporation caused fires;
3. *Injuries/fatalities* - The total number of injuries and fatalities due to electrical corporation caused fires; and
4. *Value of assets destroyed* - The total value of assets destroyed due to electrical corporation caused fires.

The data source for outcome metrics information is PacifiCorp's QDR and 2025 WMP Update.⁶¹

The figures below include outcomes related to the Slater fire of 2020, which occurred in PacifiCorp service territory and resulted in 157,220 acres burned, two fatalities, and 451 structures damaged or destroyed.⁶² On June 24, 2024, PacifiCorp announced that it settled claims related to the Slater fire for \$150 million.⁶³

The analysis below does not include the McKinney fire, which occurred in PacifiCorp service territory in 2022. The McKinney fire resulted in 60,138 acres burned, four fatalities, and 196 structures damaged or destroyed. The McKinney fire and its corresponding outcome metrics were noted by PacifiCorp in its 2023-2025 Base WMP, qualified by the statement that the McKinney fire is "under investigation."⁶⁴

The analysis below may change in subsequent APRs prepared by Energy Safety if PacifiCorp is ultimately found to be responsible for the McKinney fire.

⁶¹ 2023 Q4 QDR, Table 2; 2022 Q3 QDR, Table 2; 2025 WMP Update, page 40.

⁶² 2025 WMP Update, page 40.

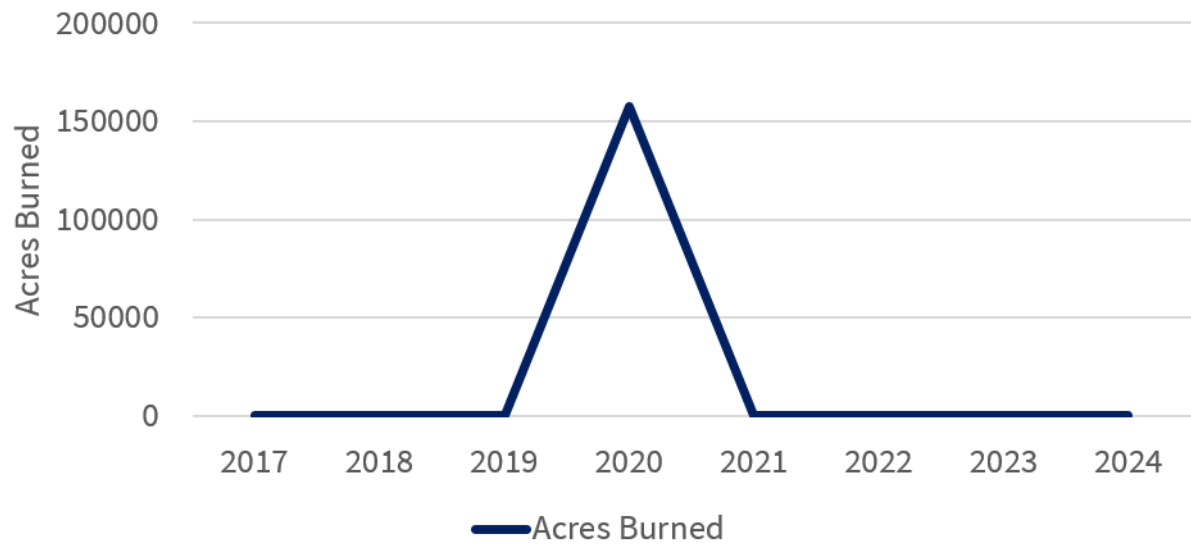
⁶³ PC 8-K.

⁶⁴ 2025 WMP Update, page 40.

Acres Burned

This figure presents total acres burned associated with PacifiCorp-caused ignitions for the 2017-2024 period. Acres burned remained near zero for most of the study period, before spiking sharply to approximately 158,000 acres in 2020 before declining steeply back to near zero in 2021 and remaining at near zero through 2024 (Figure 16).

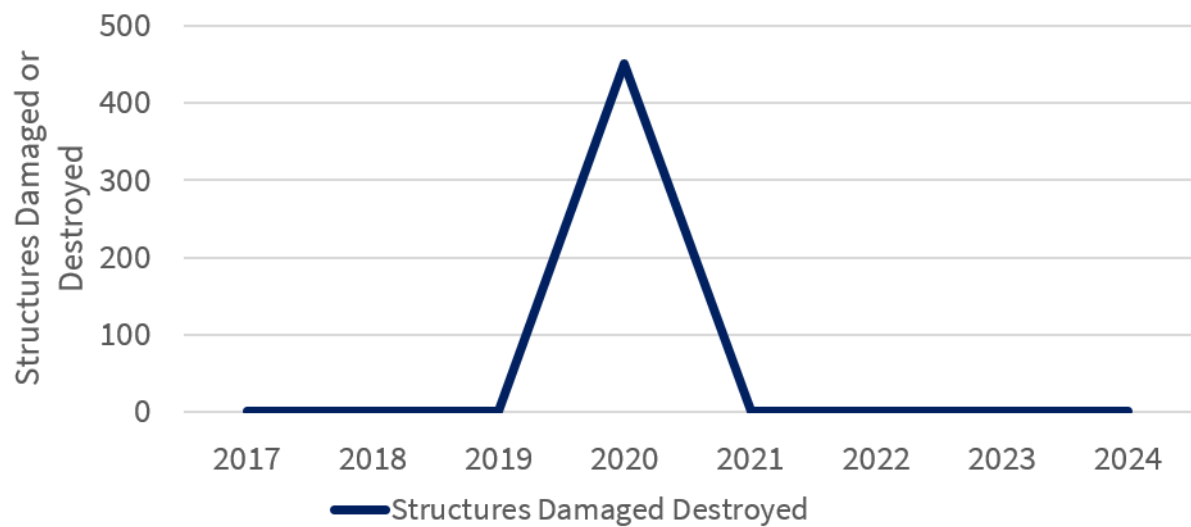
Figure 16. PacifiCorp Total Acres Burned (2017-2024)



Structures Damaged or Destroyed

Structures damaged or destroyed associated with PacifiCorp ignition events remained near zero from 2017 through 2019 before rising to a peak of approximately 450 structures in 2020, subsequently declining to zero in 2021 and remaining at zero through 2024 (Figure 17).

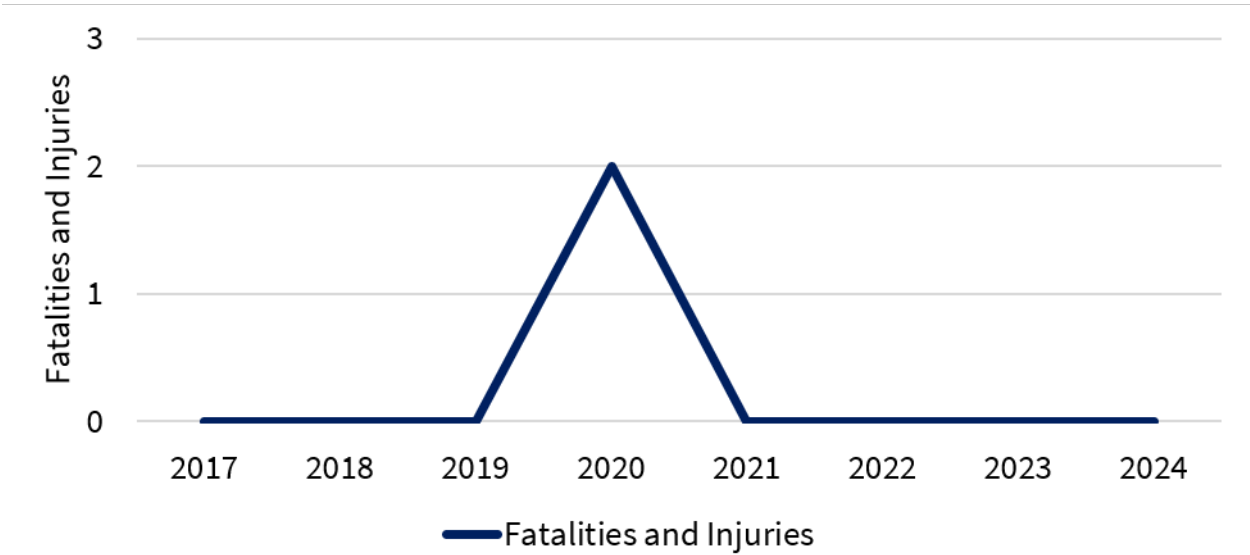
Figure 17. PacifiCorp Structures Damaged or Destroyed (2017-2024)



Injuries and Fatalities

PacifiCorp reported zero injuries and fatalities from 2017 through 2019, rising to a peak of two in 2020, subsequently declining to zero in 2021 and remaining at zero through 2024 (Figure 18).

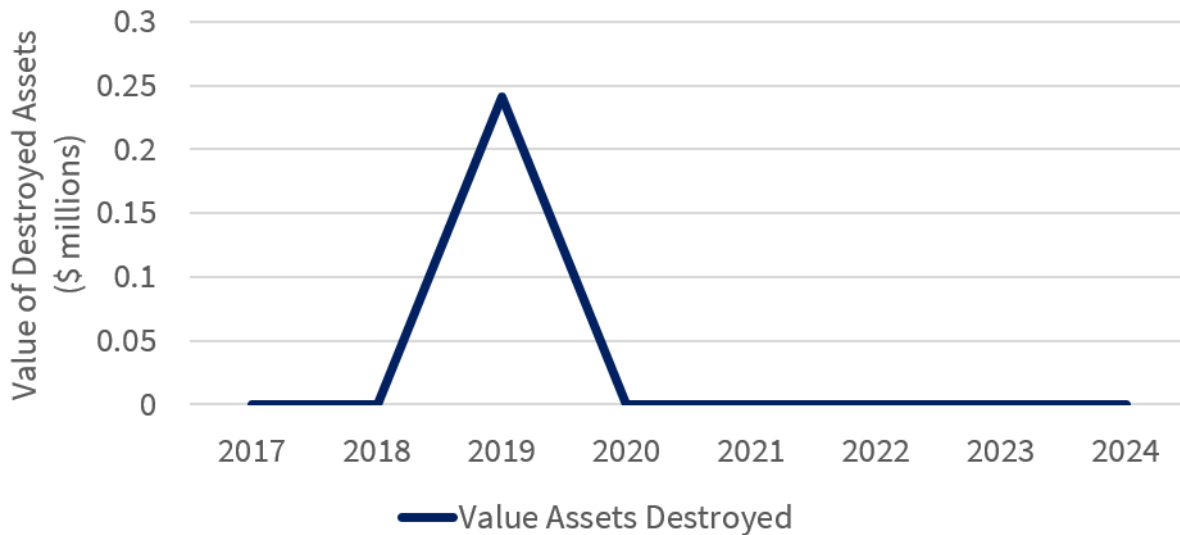
Figure 18. PacifiCorp Injuries and Fatalities (2017-2024)



Value of Destroyed Assets

The value of destroyed assets associated with PacifiCorp ignition events remained near zero from 2017 through 2018 before rising sharply to a peak of approximately \$0.24 million in 2019⁶⁵ — the highest value recorded across the 2017–2024 period — before declining to near zero in 2020 and remaining at or near zero through 2024 (Figure 19).

Figure 19. PacifiCorp Value of Destroyed Assets (2017-2024)



10. Reporting Accuracy and Completeness Performance

This section considers PacifiCorp’s performance related to its documentation of its 2024 WMP implementation. To accomplish this, Energy Safety holistically assessed all relevant information sources and assessments, including field verifications, for any systemic failings that may have hindered PacifiCorp’s ability to record and report on its 2024 WMP implementation.

Reporting accuracy and completeness is relevant to an electrical corporation’s overall performance. If an electrical corporation cannot accurately track WMP work and report on progress toward its WMP targets, this calls into question 1) the validity of reporting WMP progress, and 2) the situational awareness of the electrical corporation and therefore its

⁶⁵ Energy Safety understands this value in 2019 may be an error and should have been reported for 2020 due to the Slater Fire. However, PacifiCorp’s data submissions for this metric have not been updated to date.

ability to achieve its WMP risk reduction goals through planned wildfire safety mitigation activities. This section of the report combines five dimensions of reporting accuracy and completeness to provide an overall performance assessment. The five dimensions are:

1. The consistency of data reporting between the QDR and the EC ARC is assessed for issues beyond routine data value updates,
2. Various reports are reviewed for issues identified,
3. Findings from the IE ARC QA/QC program maturity model evaluations are summarized along with other IE ARC data issues observed,
4. Consistency between QDR tabular and QDR spatial reporting is reviewed, and
5. Data accuracy issues identified by the inspections team are reviewed.

Data reporting accuracy is an ongoing issue for PacifiCorp that has been identified in previous annual performance reporting. The 2020 Annual Report on Compliance (ARC) found that PacifiCorp failed to provide consistent data on WMP initiative attainment, which made evaluating PacifiCorp's 2020 WMP implementation difficult. Issues included that PacifiCorp failed to provide status, targets, and actual progress for the initiatives in its Q4 2020 quarterly reporting, and that for 13 initiatives, the targets reported in the Q4 2020 quarterly reporting differed from those included in its approved 2020 WMP. The 2021 ARC made similar observations, finding that, among other issues, PacifiCorp failed to track the actual work performed in 2021 and instead relied on expenditure for tracking of progress. Additionally, initial targets were not clearly defined in the 2021 WMP Update, and PacifiCorp failed to report progress updates in ways that allowed assessment.

The 2022 ARC concluded that PacifiCorp's documentation was inadequate to demonstrate compliance with several initiative activities. For 20 of its 2022 WMP initiatives, the reporting provided by PacifiCorp contained dissonances such as EC ARC targets not matching 2022 WMP targets, and EC ARC information that lacked targets and/or documentation on progress toward those initiative targets. This lack of transparency and accuracy impaired Energy Safety's ability to clearly understand if initiative activities had been completed or not, and to what extent.

Given the ongoing issues with PacifiCorp's data reporting accuracy and completeness, this APR reiterates Energy Safety's previous expectation that PacifiCorp improve its data collection and reporting practices. Future performance reporting will continue to focus on this issue to ensure that PacifiCorp improves.

10.1 QDR as compared to EC ARC

Energy Safety's analysis found minor differences between the EC ARC and Q4 tabular QDR. Slight differences amongst reports were identified, such as the total actual expenditure in the EC ARC listed \$165 million, whereas the Q4 tabular QDR was reported almost one million more for a total of \$166 million.

10.2 VMA Report Identified Issues

Energy Safety identified several data accuracy and completeness deficiencies associated with PacifiCorp's implementation with its vegetation management programs in 2024. Many of these deficiencies, identified in the 2024 VMA Report, were attributable to a failure to document work. PacifiCorp could not verify that all work was completed due to insufficient data collection and recordkeeping. In its 2024 CAP response, PacifiCorp committed to address multiple deficiencies identified in the 2024 VMA by transitioning to a new mobile data management system (MDMS). PacifiCorp expected the new MDMS would allow PacifiCorp to track work prioritization, open work orders, substation perimeter inspections, identification of fast growing and high-risk species, and to manage quality control.⁶⁶

However, during the March 30, 2026, monthly meeting with Energy Safety, PacifiCorp indicated that it had implemented its new MDMS system in October 2025 but took it off-line in the first quarter of 2026 due to unresolvable functionality issues.⁶⁷ Consequently, PacifiCorp reverted to its legacy MDMS system in April of 2026.⁶⁸ PacifiCorp stated that it intended to update its legacy MDMS to provide the functionality described in its CAP and was coordinating with its vendor to identify the feasibility of improving its legacy system to provide some of the new features in the interim.⁶⁹ However, PacifiCorp has not identified a timeline in which the updates to its legacy MDMS would be implemented and it did not provide a timeline for troubleshooting the new MDMS system. Therefore, Energy Safety concluded that PacifiCorp's corrective actions did not address the data accuracy and completeness issues identified in the 2024 VMA.

In addition, PacifiCorp did not collect data to ensure that its contractors appropriately managed wood and slash generated during vegetation mitigation work and did not identify specific corrective actions to address this deficiency in 2024. PacifiCorp committed to implement unspecified improvements to its procedures in 2028, which does not conform to the urgency of the issue.⁷⁰

Finally, PacifiCorp acknowledged that it does not have a full inventory of all poles in its service territory and focuses its pole clearing activities on poles that have been historically cleared.⁷¹ PacifiCorp stated that it acknowledged this was an area for improvement and was working towards developing an inventory but did not provide a timeline for this work.

⁶⁶ PacifiCorp's 2024 VM Audit. PacifiCorp's Corrective Action Plan.

⁶⁷ Monthly meeting between PacifiCorp and Energy Safety's Environmental Science Division. March 30, 2026, and follow up email sent April 1, 2026.

⁶⁸ Monthly meeting between PacifiCorp and Energy Safety's Environmental Science Division. March 30, 2026, and follow up email sent April 1, 2026.

⁶⁹ PacifiCorp, CA - MDMS - Energy Safety (1) 4-22-26 (002), (April 22, 2026), page 4.

⁷⁰ PacifiCorp's 2023 SVM Audit, page 6.

⁷¹ Monthly meeting between PacifiCorp and Energy Safety's Environmental Science Division. January 30, 2026.

10.3 IE ARC Evaluation

The IE noted multiple instances of data accuracy issues throughout PacifiCorp’s reporting. Six initiatives (GH-05, AI-07, AI-12, SA-05, and CO-01) were identified as misreported by PacifiCorp for its actual progress in either its EC ARC or QDR, but usually by a small amount. The IE noted two initiatives, (CO-01 and VM-011), which reported work completed in 2023 as being completed in 2024. As mentioned earlier in Section 5, the IE lacked confidence in PacifiCorp’s data collection capabilities for work planning and oversight.

10.4 Comparison of Spatial and Tabular QDR Data

Pursuant to Energy Safety’s Data Guidelines, electrical corporations must submit quarterly data reports in both spatial and non-spatial (i.e., tabular) formats. Each of these quarterly reports must contain accurate information about the progress in meeting WMP targets throughout a compliance period.⁷²

Energy Safety assessed the data submitted by PacifiCorp regarding the WMP work it completed in 2024, in both the spatial and tabular QDR submissions. Energy Safety found the following inconsistencies between spatial and tabular QDR submissions, which may call into question PacifiCorp’s data reporting practices and initiative attainment. Of the 37 2024 WMP initiatives, 10 showed discrepancies between tabular and spatial data (*Table 6*).⁷³ Additionally, Energy Safety identified deviations in reporting of ignition risk events (*Table 7*).

Table 6. Energy Safety Summary of Initiatives with Inconsistent QDR Reporting

Initiatives with Inconsistent QDR Reporting	2024 WMP Target ⁷⁴	Actual Recorded in Tabular QDR	Actual Recorded in Spatial QDR	Deviation (%) ⁷⁵
Distribution Pole Replacement (8.1.2.3)	1,600 Poles	1,269 points	1,608 poles	27%

⁷² Data Guidelines, page 1, pages 47-105, and pages 151-156.

⁷³ For more information regarding the unmet initiatives, see Appendix A.

⁷⁴ 2024 WMP, pages 134-137, 185-187, 215, 253, 268-269.

⁷⁵ When units of measure were comparable, such as with points and poles, Energy Safety proceeded to note the percent deviation between tabular and spatial data. When units of measure were not comparable, such as with miles and points, Energy Safety did not attempt to present a percent deviation.

Initiatives with Inconsistent QDR Reporting	2024 WMP Target ⁷⁴	Actual Recorded in Tabular QDR	Actual Recorded in Spatial QDR	Deviation (%) ⁷⁵
Expulsion Fuse Replacement (8.1.2.12)	500 Fuse locations	1,261 points	2,673 fuse locations	N/A Units of measure differ between the Spatial QDR and the Tabular QDR.
System Automation (GH-03)	20 devices	15 points	11 devices	26%
Transmission Pole Replacement (8.1.2.3)	204 Poles	101 points	160 poles	58%
Weather Stations (8.3.2.1)	N/A	25 points	N/A	N/A Units of measure differ between the Spatial QDR and the Tabular QDR.
Detailed inspections of vegetation around distribution electric lines and equipment (8.2.2.1)	875 Line miles	1,744.19 miles ⁷⁶	874 Line miles	50%

⁷⁶ All initiatives (vegetation and hardening) within this column only reported miles – and did not distinguish line miles, specifically.

Initiatives with Inconsistent QDR Reporting	2024 WMP Target ⁷⁴	Actual Recorded in Tabular QDR	Actual Recorded in Spatial QDR	Deviation (%) ⁷⁵
Detailed inspections of vegetation around transmission electric lines and equipment (8.2.2.2)	602 Line miles	613.02 miles	599 Line miles	2.2%
Line Rebuild (None)	80 Line miles	50.78 miles	72 Line miles	42%
Patrol inspections of vegetation around transmission electric lines and equipment (8.2.2.4)	99 Line miles	41.02 miles	119 Line miles	190%
Vegetation management to achieve clearances (8.2.3)	3,126 Line miles	1,858.02 miles	3,192 Line miles	71%

Table 7. Energy Safety Summary of Ignition Risk Metrics with Inconsistent QDR Reporting

Risk Metrics with Inconsistent QDR Reporting	Actual Recorded in Tabular QDR	Actual Recorded in Spatial QDR	Deviation (%)
2024 Total Ignitions	4	2	50%
2024 Total Wire Down Events	112	54	48%
2024 Total Unplanned Outage Events	354	1,019	287%

As displayed above, PacifiCorp routinely provided contradictory data to Energy Safety through different reporting mechanisms, and this interfered with Energy Safety's ability to efficiently evaluate PacifiCorp's WMP performance in 2024. As data governance issues like

these have perpetuated for several years, PacifiCorp must continue to improve the accuracy of its WMP implementation documentation practices.

Given the ongoing issues with PacifiCorp's data reporting accuracy and completeness, this APR reiterates Energy Safety's previous expectation that PacifiCorp improve its data collection and reporting practices. Future performance reporting will continue to focus on this issue to ensure that PacifiCorp improves.

10.5 Field Inspection Issues Identified

Energy Safety's field inspections of PacifiCorp 2024 WMP work identified accuracy issues regarding initiatives related to Distribution Pole Replacement (GH-02), Expulsion Fuse Replacement (GH-05), Line Rebuild - Covered Conductor installation (GH-01), and installation of System Automation Equipment (GH-04).

For the distribution pole replacement work, Energy Safety found in one instance an old pole adjacent to a newly replaced pole remained in use, with an attached riser carrying secondary conductors from the transformer mounted on the new pole.⁷⁷ For the covered conductor work, Energy Safety issued one Notice of Violation (NOV) due to the covered conductor not being installed in the area where PacifiCorp claimed to have installed it.⁷⁸ For the expulsion fuse replacement initiative, Energy Safety issued five NOVs due to the following issues:

- 1) Non-expulsion fuses were not attached to the cutouts;⁷⁹
- 2) Solid-blade disconnect fuses, not explicitly expulsion fuses, were installed and claimed towards completed work for this initiative;⁸⁰
- 3) Fuses were observed hanging from the pole;⁸¹ and
- 4) An expulsion fuse was not replaced, although it had been reported as such.⁸²

With respect to the system automation equipment initiative, PacifiCorp originally reported installing 11 devices in 2024, but later verified via a data request response that only nine were installed. After Energy Safety requested photos of the completed nine installations, one site's installation appeared to have been reported twice, and therefore Energy Safety determined

⁷⁷ PacifiCorp Notice of Violation 1503.

⁷⁸ PacifiCorp Notice of Violation 1356.

⁷⁹ PacifiCorp Notice of Violation 1042.

⁸⁰ PacifiCorp Notice of Violation 1042.

⁸¹ PacifiCorp Notice of Non-Performance 1252.

⁸² PacifiCorp Notice of Violation 1200.

that PacifiCorp should only receive credit for eight installations of system automation equipment in 2024.^{83, 84}

10.6 Data Accuracy and Completeness Conclusions

As described above, Energy Safety found that PacifiCorp's documentation and reporting on its 2024 WMP implementation was inconsistent in several areas. These problems have persisted for many years and have been identified in prior reports. Energy Safety's assessment of all the initiatives by data source can be found in Appendix A.

Taken together, this analysis shows that PacifiCorp must continue to improve the accuracy of its WMP implementation documentation practices. Energy Safety will monitor PacifiCorp's reporting and expects improvements regarding the accuracy of PacifiCorp's documentation and tracking processes going forward.

11. Conclusion

Energy Safety makes the following observations and recommendations regarding PacifiCorp's execution of its WMP initiative activities and the performance of its infrastructure relative to its wildfire risk in 2024.

WMP Initiative Attainment Performance

For initiative attainment, PacifiCorp completed 28 of its 37 2024 WMP initiatives (76%). PacifiCorp missed initiative targets related to covered conductor installation, clearing of vegetation around poles, wood and slash management, data governance, and community engagement in 2024, and also periodically missed targets related to these initiatives during the 2020-2023 period as well. This suggests a more systemic issue with PacifiCorp's implementation of its WMP work generally that it must address.

Furthermore, Energy Safety concluded that \$166.5 million (180%) was spent of \$92.4 million proposed by PacifiCorp for 2024 WMP work. This financial performance suggests that PacifiCorp needs to improve project planning and budgeting processes for its WMP work, particularly its work on covered conductor.

⁸³ DR-293, 2024.

⁸⁴ DR- 066, 2025. The photos of the duplicated work reported by PacifiCorp also appear to show a metal pole at the location in question, even though Energy Safety inspectors determined that a wooden pole actually exists at the location reported by PacifiCorp. This further calls into question the accuracy of some of PacifiCorp's WMP reporting.

Ignition Risk and Public Safety Power Shutoff Performance

PacifiCorp's ignition events and wire down events normalized by overhead circuit mile continued to decline in 2024 to relatively low levels. PacifiCorp has not reported any PSPS events since 2021.

Data Reporting Accuracy and Completeness Performance

PacifiCorp's reporting accuracy and completeness require improvement. The IE and Energy Safety have communicated that PacifiCorp's recordkeeping systems are inadequate for planning and tracking WMP activities. Actual reports of work completed frequently contain errors, as noted by Energy Safety field inspections. The system automation initiative accounting for work completed was determined to be incorrect after Energy Safety requested further supporting documentation, in the form of pictures, to accommodate a spreadsheet of duplicate locations.

The differences between tabular and spatial data submitted by PacifiCorp for 10 initiatives (27% of total initiatives for 2024) varied by an average of approximately 50% without explanation. Comparing tabular and spatial data for three ignition metrics (ignitions, wires down, and unplanned outages) showed a variance between 30% to 50%. PacifiCorp must continue to improve the accuracy of its WMP implementation documentation practices. These problems have persisted for many years and have been identified in prior reports.

Given the ongoing issues with PacifiCorp's data reporting accuracy and completeness, this APR reiterates Energy Safety's previous expectation that PacifiCorp improve its data collection and reporting practices. Future performance reporting will continue to focus on this issue to ensure that PacifiCorp improves.

Conclusion

Going forward, PacifiCorp must show, through consistent action, that it will honor its WMP commitments and thus meaningfully reduce wildfire risk in the manner committed to its customers and the people of California through its WMP. Energy Safety will continue to monitor PacifiCorp's implementation of its ongoing wildfire mitigation activities so that PacifiCorp improves its ability to eliminate utility-caused catastrophic wildfires in California.

12. References

Table 8. References for Citations

Citation	Reference
2022 Q3 QDR	PacifiCorp, " <u>PC 2022 Q3 QDR R0</u> ," Published November 7, 2022, URL:(https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53216&docket=2022-QDR&shareable=true).
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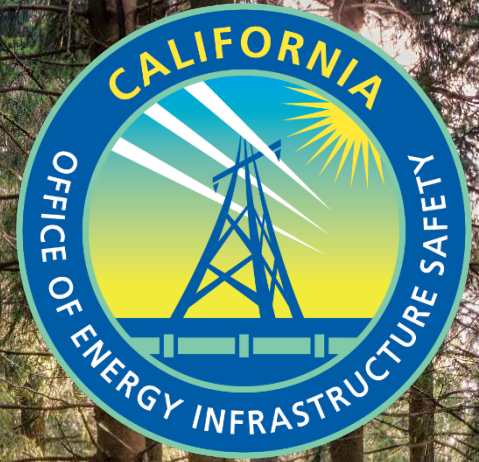
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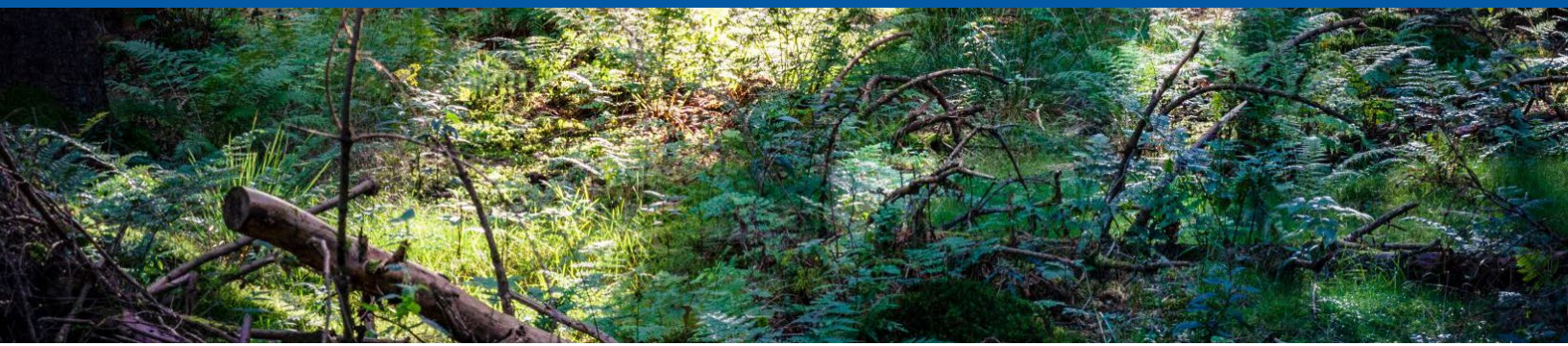
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APPENDICES



13. Appendices

Appendix A: PacifiCorp Information on WMP Initiative Attainment

Table 9 summarizes each of PacifiCorp's 37 initiative targets from its 2024 WMP, PacifiCorp's self-reporting on performance contained in its QDR, PacifiCorp's self-reporting on performance contained in its submission in response to Energy Safety, PacifiCorp's EC ARC, the IE ARC, and the VMA Report.⁸⁵

⁸⁵2024 QDR, EC ARC, IE ARC, and VMA Report.

Table 9. WMP Initiative Activity Attainment Information⁸⁶

2024 WMP Initiative	2024 WMP Activity Target	QDR	EC ARC	IE ARC	Attainment Status	Proposed Expenditure (\$ thousand) ⁸⁷	Actual Expenditure (\$ thousand)
Line Rebuild-Cover Conductor Installation 8.1.2.1 GH-01	Install 80 Line Miles of Covered Conductor	Not met Target: 80 Line Miles Actual: 72 Line Miles	Not met Target: 80 Line Miles Actual: 72 Line Miles	Not met Target: 80 Line Miles Actual: 72 Line Miles	Not met	\$62,313	\$115,739
Distribution Pole Replacements 8.1.2.3 GH-02	Replace 1,600 Distribution Poles	Met Target: 1,600 Poles Actual: 1,608 poles	Met Target: 1,600 Poles Actual: 1,612 poles	Not met Target: 1,600 Poles Actual: 1,560 Poles	Met	\$0	\$0

⁸⁶ This table includes all initiative activities that had targets for the 2024 calendar year but does not include initiative activities for which PacifiCorp had proposed or actual expenditures and no targets for the 2024 calendar year.

⁸⁷ If PacifiCorp did not report a proposed spending amount for a particular initiative in the ARC and QDR, the corresponding cell in this column is shown as zero. Where PacifiCorp provided additional context to Energy Safety or the IE, that information is noted in a footnote.

2024 WMP Initiative	2024 WMP Activity Target	QDR	EC ARC	IE ARC	Attainment Status	Proposed Expenditure (\$ thousand) 87	Actual Expenditure (\$ thousand)
Transmission Pole Replacement 8.1.2.4 GH-03	Replace 160 Transmission Poles	Met Target: 160 Poles Actual: 204 Poles	Met Target: 160 Poles Actual: 204 Poles	Met Target: 160 Poles Actual: 204.8 Poles	Met	\$0	\$0
Installation of System Automation Equipment 8.1.2.8 GH-04	Install 20 devices	Not met Target: 20 Devices Actual: 11 Devices	Not met Target: 20 Devices Actual: 11 Devices	Not met Target: 20 Devices Actual: 11 Devices	Not met	\$5,000	\$12,796
Expulsion Fuse Replacement 8.1.2.12 GH-05	Replace fuses at 500 locations	Met Target: 500 Fuse Locations Actual: 2,673 Fuse locations	Met Target: 500 Fuse Locations Actual: 2,674 Fuse locations	Met Target: 500 Fuse Locations Actual: 2,580 Fuse locations	Met	\$1,000	\$5,324

2024 WMP Initiative	2024 WMP Activity Target	QDR	EC ARC	IE ARC	Attainment Status	Proposed Expenditure (\$ thousand) 87	Actual Expenditure (\$ thousand)
Equipment Maintenance and Repair 8.1.4 MA-01	All stations as of 2023.	Met Target: All stations as of 2023 Actual: 108 Units	Met Target: All stations as of 2023 Actual: All stations were maintained	Met Target: All stations as of 2023 Actual: 108 units	Met	\$285	\$387
Transmission Pole Inspections 8.1.3.1 AI-01	Complete 12,034 inspections	Met Target: 12,034 Inspections Actual: 12,261 inspections	Met Target: 12,034 Inspections Actual: 12,261 inspections	Met Target: 12,034 inspections Actual: 12,261 Inspections	Met	\$93	\$63
Distribution Pole Inspections 8.1.3.1 AI-02	Complete 46,276 inspections	Met Target: 46,276 Inspections Actual: 48,403 Inspections	Met Target: 46,276 Inspections Actual: 48,403 inspections	Met Target: 46,276 Inspections Actual: 48,403 Inspections	Met	\$308	\$266

2024 WMP Initiative	2024 WMP Activity Target	QDR	EC ARC	IE ARC	Attainment Status	Proposed Expenditure (\$ thousand) 87	Actual Expenditure (\$ thousand)
Transmission Detail Inspections 8.1.3.2 AI-03	Complete 1,631 inspections	Met Target: 1,631 Inspections Actual: 1,631 Inspections	Met Target: 1,631 Inspections Actual: 1,631 Inspections	Met Target: 1,631 Inspections Actual: 1,631 Inspections	Met	\$137	\$57
Distribution Detail Inspection 8.1.3.2 AI-04	Complete 8,672 inspections	Not met Target: 8,672 inspections Actual: 8,628 Inspections	Not met Target: 8,672 inspections Actual: 8,628 Inspections	Not met Target: 8,672 Inspections Actual: 8,542 Inspections	Met ⁸⁸	\$203	\$231

⁸⁸ IE ARC, page 43, states “the remaining inspection locations were determined to be retired facility points or incorrectly labeled in the system and did not meet criteria for inspections as part of this initiative... Pacific Power considers this initiative s complete for 2024 and does not have any corrective actions for the variance.”

2024 WMP Initiative	2024 WMP Activity Target	QDR	EC ARC	IE ARC	Attainment Status	Proposed Expenditure (\$ thousand) 87	Actual Expenditure (\$ thousand)
Transmission Intrusive Pole Inspection 8.1.3.3 AI-05	Complete 783 inspections	Not met Target: 783 Inspections Actual: 780 inspections	Not met Target: 783 Inspections Actual: 780 inspections	Not met Target: 783 Inspections Actual: 780 inspections	Met ⁸⁹	\$171	\$95
Distribution Intrusive Pole Inspection 8.1.3.3 AI-06	Complete 2,523 inspections	Not met Target: 2,523 Inspections Actual: 2,517 Inspections	Met Target: 2,523 Inspections Actual: 2,517 Inspections	Met Target: 2,523 Inspections Actual: 2,517 Inspections	Met ⁹⁰	\$90	\$103

⁸⁹ IE ARC, page 44, states, “the remaining inspection locations were determined to be retired facility points which did not meet the criteria for inspection as part of this initiative. Pacific Power considers this initiative complete for 2024 and does not have any corrective actions for the variance.”

⁹⁰ IE ARC, page 45, states, “the remaining inspection locations were determined to be retired facility points or incorrectly labeled in the system and did not meet the criteria for inspection as part of this initiative. Pacific Power considers this initiative complete for 2024 and does not have any corrective actions for the variance.”⁹¹ IE ARC, page 46, states “PacifiCorp confirmed that he reported figure should have been 693 line-miles due to the decommissioning of three lines accounting for roughly seven line-miles prior to inspections.”

2024 WMP Initiative	2024 WMP Activity Target	QDR	EC ARC	IE ARC	Attainment Status	Proposed Expenditure (\$ thousand) 87	Actual Expenditure (\$ thousand)
Enhanced (Infrared) Inspections in Transmission Lines 8.1.3.6 AI-07	Complete 700 Line Miles of inspections	Met Target: 700 Line Miles Actual: 700 Line Miles	Met Target: 700 Line Miles Actual: 700 Line Miles	Not met Target: 700 Line Miles Actual: 693 Line Miles	Met ⁹¹	\$90	\$85
Enhanced (Infrared) Inspections in Distribution Lines 8.1.3.5 AI-08	Complete 800 Line Miles of inspections	Met Target:810 Line Miles Actual: 810 Line Miles	Met Target:810 Line Miles Actual: 810 Line Miles	Met Target:810 Line Miles Actual: 810 Line Miles	Met	\$130	\$129

⁹¹ IE ARC, page 46, states “PacifiCorp confirmed that he reported figure should have been 693 line-miles due to the decommissioning of three lines accounting for roughly seven line-miles prior to inspections.”

2024 WMP Initiative	2024 WMP Activity Target	QDR	EC ARC	IE ARC	Attainment Status	Proposed Expenditure (\$ thousand) 87	Actual Expenditure (\$ thousand)
Substation inspections (Minor, Major, Security, and Infrared) 8.1.3.4 AI-11	Complete 451 inspections	Not met Target: 451 Inspections Actual: 443 Inspections	Not met Target: 451 Inspections Actual: 443 Inspections	Not met Target: 451 Inspections Actual: 443 Inspections	Met ⁹²	\$179	\$181
Quality Assurance/Quality Control 8.1.6 AI-12	QA/QC Inspections (5% or 681 Inspections)	Met Target: 681 Inspections Actual: 826 Inspections	Met Target: 681 Inspections Actual: 826 Inspections	Met Target: 681 Inspections Actual: 825 inspections	Met	\$36	\$0

⁹² IE ARC, page 49, states, “this difference was due to the decommissioning of a substation in 2024 that was not included in the original plan. Pacific Power considers this initiative complete for 2024 and does not have any corrective actions for the variance.”⁹³ 2024 VMA Report, pages 4, 9, 13-14.

2024 WMP Initiative	2024 WMP Activity Target	QDR	EC ARC	IE ARC	Attainment Status	Proposed Expenditure (\$ thousand) 87	Actual Expenditure (\$ thousand)
Detailed Inspection-Distribution 8.2.2.1 VM-01	874 Circuit Miles inspected	Met Target: 874 Line Miles Actual: 875 Line Miles	Met Target: 874 Line Miles Actual: 874 Line Miles	Met Target: 874 Line Miles Actual: 874 Line Miles	Met	\$294	\$492
Detailed Inspection-Transmission 8.2.2.1 VM-02	602 Line Miles Inspected	Not met Target: 602 Line Miles Actual: 599 Line Miles	Met Target: 602 Line Miles Actual: 602 Line Miles	Met Target: 602 Line Miles Actual: 602 Line Miles	Met	\$157	\$201
Patrol Inspection-Distribution 8.2.2.2 VM-03	865 Circuit Miles Inspected	Met Target: 865 Line Miles Actual: 1,037 Line Miles	Met Target: 865 Circuit Miles Actual: 865 Circuit Miles	Met Target: 865 Line Miles Actual: 1,038 Line Miles	Met	\$316	\$333

2024 WMP Initiative	2024 WMP Activity Target	QDR	EC ARC	IE ARC	Attainment Status	Proposed Expenditure (\$ thousand) 87	Actual Expenditure (\$ thousand)
Patrol Inspection-Transmission 8.2.2.2 VM-04	99 Line Miles inspected	Met Target:99 Line Miles Actual: 119 Line Miles	Met Target:99 Line Miles Actual: 99 Line Miles	Met Target:99 Line Miles Actual: 118.8 Line Miles	Met	\$20	\$25
Wood and Slash Management 8.2.3.1.1 (No tracking ID)	Debris management (chipping removing, recycling slash)	N/A Target: N/A Actual: N/A	N/A Target: N/A Actual: N/A	N/A Target: N/A Actual: N/A	Not met ⁹³		

⁹³ 2024 VMA Report, pages 4, 9, 13-14.

2024 WMP Initiative	2024 WMP Activity Target	QDR	EC ARC	IE ARC	Attainment Status	Proposed Expenditure (\$ thousand) 87	Actual Expenditure (\$ thousand)
Fuels Management and Pole Clearing beyond PRC 8.2.3.1.2 VM-05	1) 3126 Poles brushed in LRA HFTD areas; 2) Clear space around pole, removal of dead vegetation, herbicide application	Met Target: 3,126 Poles Brushed Actual: 3,192 Poles Brushed	Met Target: 3,126 Poles Brushed Actual: 3,126 Poles Brushed	Not met Target: 3,126 Poles Brushed Actual: 2,438.28 Poles Brushed	Not met ⁹⁴	\$374	\$413

⁹⁴ 2024 VMA Report, pages 5, 19, 15-17, A-6, A-8, and A-20 through A-23.

2024 WMP Initiative	2024 WMP Activity Target	QDR	EC ARC	IE ARC	Attainment Status	Proposed Expenditure (\$ thousand) 87	Actual Expenditure (\$ thousand)
Clearance-Distribution and Transmission 8.2.3.2 VM-06, VM-07	1) Cycle-based maintenance coupled with annual patrol and corrective maintenance. 2) Increased clearance distances based on tree growth rate. 3) increased clearance distances based on tree physical structure.	N/A Target: N/A Actual: N/A	N/A Target: N/A Actual: N/A	N/A Target: N/A Actual: N/A	Not met ⁹⁵	\$16,991	\$20,793

⁹⁵ 2024 VMA Report, pages 5, 9, 17-19, 31, A-6, A-8, A-12 to A-17 and A-23 through A-25.

2024 WMP Initiative	2024 WMP Activity Target	QDR	EC ARC	IE ARC	Attainment Status	Proposed Expenditure (\$ thousand) 87	Actual Expenditure (\$ thousand)
Fall-in Mitigation 8.2.3.3 VM-08	Identifies and addresses hazard trees	N/A Target: N/A Actual: N/A	N/A Target: N/A Actual: N/A	N/A Target: N/A Actual: N/A	Met ⁹⁶	\$30	\$0
Substation Defensible Space 8.2.3.4 (No tracking ID)	Substation inspection	N/A Target: N/A Actual: N/A	N/A Target: N/A Actual: N/A	N/A Target: N/A Actual: N/A	Met ⁹⁷	\$0	\$0
High-Risk Species 8.2.3.5 (No tracking ID)	Performing additional pruning for at-risk species with fast growth rates.	N/A Target: N/A Actual: N/A	N/A Target: N/A Actual: N/A	N/A Target: N/A Actual: N/A	Met ⁹⁸	\$0	\$0

⁹⁶ 2024 VMA Report, pages 9, A-6, A-8, and A-25 through A-28.

⁹⁷ 2024 VMA Report, pages 9, 20-21, A-6, A-8, and A-28 through A-30.

⁹⁸ 2024 VMA Report pages, 5, 9, 19, 22-23, 31, A-6, A-8, and A-30 through A-31.

2024 WMP Initiative	2024 WMP Activity Target	QDR	EC ARC	IE ARC	Attainment Status	Proposed Expenditure (\$ thousand) 87	Actual Expenditure (\$ thousand)
Fire Resilient Right of Ways 8.2.3.6 (No tracking ID)	1) Identify and address undesirable vegetation. 2) Provide tree replacement vouchers.	N/A Target: N/A Actual: N/A	N/A Target: N/A Actual: N/A	N/A Target: N/A Actual: N/A	Met ⁹⁹	\$0	\$0
Emergency Response Vegetation Management 8.2.3.7 (No tracking ID)	1) Conduct targeted patrols, when necessary. 2) Patrol wildfire-impact areas.	N/A Target: N/A Actual: N/A	N/A Target: N/A Actual: N/A	N/A Target: N/A Actual: N/A	Met ¹⁰⁰	\$0	\$0

⁹⁹ 2024 VMA Report, pages 9, A-6, A-9, and A-31 through A 34.

¹⁰⁰ 2024 VMA Report, pages 9, A-6, A-9, and A-34 through A-35.

2024 WMP Initiative	2024 WMP Activity Target	QDR	EC ARC	IE ARC	Attainment Status	Proposed Expenditure (\$ thousand) 87	Actual Expenditure (\$ thousand)
Vegetation Management Enterprise System 8.2.4 (No tracking ID)	Seek opportunity for improvement	N/A Target: N/A Actual: N/A	N/A Target: N/A Actual: N/A	N/A Target: N/A Actual: N/A	Met ¹⁰¹	\$0	\$0
QA/QC-Post Audits Distribution (D) and Transmission (T) (Patrol) 8.2.5 VM-11	865 Line Miles (D) 99 Line Miles (T)	Met Target: 865 Line Miles; Actual: 1,037 Line Miles Target: 99 Line Miles Actual: 119 Line Miles	Met Target: 865 Line Miles Actual: 865 Line Miles Target: 99 Line Miles Actual: 99 Line Miles	Met Target: 865 Line Miles Actual: 1,038 Line Miles Target: 99 Line Miles Actual: 118 Line Miles	Not met ¹⁰²	\$135	\$171

¹⁰¹ 2024 VMA Report, pages 9, A-6, A-9, A-36.

¹⁰² 2024 VMA Report, pages 6, 24-25, 33, A-9, and A-37 through A-40.

2024 WMP Initiative	2024 WMP Activity Target	QDR	EC ARC	IE ARC	Attainment Status	Proposed Expenditure (\$ thousand) 87	Actual Expenditure (\$ thousand)
Open Work Orders 8.2.6 (No tracking ID)	1)Vegetation work completed 1-6 weeks after inspection. 2) Link prescribed and completed prescriptions.	N/A Target: N/A Actual: N/A	N/A Target: N/A Actual: N/A	N/A Target: N/A Actual: N/A	Not met ¹⁰³	\$0	\$0
Workforce Training 8.2.7 (No tracking ID)	Certified foresters, provide trainings	N/A Target: N/A Actual: N/A	N/A Target: N/A Actual: N/A	N/A Target: N/A Actual: N/A	Met ¹⁰⁴	\$0	\$0

¹⁰³ 2024 VMA Report, pages 4, 6, 9, 26-28, A-6, A-9 to A-10, and A-41 through A-44.

¹⁰⁴ 2024 VMA Report, pages 3, 9, 28-30, A-6, A-10, A-45 through A-46.

2024 WMP Initiative	2024 WMP Activity Target	QDR	EC ARC	IE ARC	Attainment Status	Proposed Expenditure (\$ thousand) 87	Actual Expenditure (\$ thousand)
Weather Stations 8.3.2.1 SA-01	Eight stations installed	Met Target: Eight Weather Stations Installed Actual: 10 Weather Stations Installed	Met Target: Eight Weather Stations Installed Actual: 10 Weather Stations Installed	Met Target: Eight Weather Stations Installed Actual: 10 Weather Stations Installed	Met	\$160	\$209
Wildfire Cameras 8.3.4.1 SA-04	Six cameras installed	Met Target: Six Cameras Installed Actual: Six Cameras Installed	Met Target: Six Cameras installed Actual: Six Cameras Installed	Met Target: Six Cameras installed Actual: Six Cameras Installed	Met	\$1,065	\$1,031

2024 WMP Initiative	2024 WMP Activity Target	QDR	EC ARC	IE ARC	Attainment Status	Proposed Expenditure (\$ thousand) 87	Actual Expenditure (\$ thousand)
External Collaborations and Coordination 8.4.3.1 EP-02	1 Functional Exercise, 1 Tabletop Exercise, 1 Workshop	Met Target: Conduct one Functional exercise, tabletop exercise, workshop & preparedness fair/community resource center (CRC) demo Actual: Preparedness fair on May 1, 2024. Tabletop exercise, workshop, and CRC demonstration on May 22, 2024. Functional exercise on June 25, 2024.	Met Target: Conduct one Functional exercise, tabletop exercise, workshop & preparedness fair/CRC demo Actual: Completed one Tabletop exercise, 1 Functional exercise & one workshop with Modoc County.	Met Target: Conduct one Functional exercise, tabletop exercise, workshop & preparedness fair/CRC demo Actual: one Tabletop exercise on May 22, 2024, 1 Functional exercise on June 25, 2024, 1 workshop on May 22, 2024 & Preparedness Fair on May 1, 2024	Met	\$30	\$7

2024 WMP Initiative	2024 WMP Activity Target	QDR	EC ARC	IE ARC	Attainment Status	Proposed Expenditure (\$ thousand) 87	Actual Expenditure (\$ thousand)
Public Emergency Communication Strategy 8.4.4.2 EP-03	Implement improvements to the Public Safety Partner Portal (PSP) and deliver a dashboard for situational awareness during PSPS responses	N/A Target: N/A Actual: N/A	Met Target: Implement improvements to PSP portal Actual: Continue to improve the PSP portal, met CPUC web based requirements, interactive mapping, prioritize restoration, backup power evaluation, additional communications , and other resources before & during PSPS events.	Met Target: Implement improvements to the PSP Portal and deliver a dashboard for situational awareness during PSPS responses Actual: Implemented improvements to the PSP portal and delivered a dashboard for situational awareness during PSPS response.	Met	\$0	\$0

2024 WMP Initiative	2024 WMP Activity Target	QDR	EC ARC	IE ARC	Attainment Status	Proposed Expenditure (\$ thousand) 87	Actual Expenditure (\$ thousand)
Public Outreach and Educational Awareness Program 8.5.2 CO-01	1) Perform customer surveys with 55% or more of respondents being aware of wildfire safety messaging; 2) PacifiCorp remains the most mentioned source of messaging about wildfire preparedness; 3) One additional language for the medical certificate.	Met Target: Perform customer surveys with 55% or more of survey respondents being aware of wildfire safety messaging. Actual: 55% or more of survey respondents are aware of wildfire safety messaging.	Met Target: One Additional language for the medical certificate Actual: Review of the website & backend logs confirmed that the medical certificate application is available in Spanish.	Not met Target 1) Actual: Preformed customer surveys with 55% or more of respondents reporting awareness of wildfire safety messaging. Target 2) Actual : PacifiCorp was the most mentioned source of wildfire preparedness. Target: 3) Actual: No additional language for the medical certificate was added in 2024.	Not Met	\$90	\$100

Appendix B: PacifiCorp Vegetation Management Audit Report

On May 22, 2026, Energy Safety issued its Vegetation Management Audit (VMA) Report for PacifiCorp. In the VMA, Energy Safety assesses completeness of each qualitative commitment and quantitative target associated with each initiative from the electrical corporation’s approved WMP. The VMA issues findings on the initiative level, as defined in Appendix A of the 2023-2025 Wildfire Mitigation Plan Technical Guidelines.⁸⁶ The VMA Report concluded that, of the 13 vegetation management initiatives considered, PacifiCorp did not complete all work for six vegetation management initiatives:

- 8.2.3.2 Wood and Slash Management
- 8.2.3.1.2 Pole Clearing
- 8.2.3.2 Clearance
- 8.2.3.5 High-Risk Species
- 8.2.5. Quality Assurance and Quality Control
- 8.2.6 Open Work Orders

The findings from Energy Safety’s VMA Report are detailed in Table 10, which provides a crosswalk between the vegetation management initiative numbers included in the VMA Report to the Utility Initiative Tracking IDs included in this APR. A finding of “Complete” for the VMA Report indicates that PacifiCorp provided documentation to support that all work was completed. A finding of “Achieved Objective” indicates that, while Energy Safety identified some deficiencies, the majority of the work was completed and PacifiCorp’s CAP provided corrective actions that will address any remaining deficiencies. A finding of “Deficient” indicates that PacifiCorp did not provide sufficient documentation to demonstrate that all work was completed and did not provide sufficient corrective actions to ensure that work would be completed in the future performance years.

Table 10. Energy Safety Findings from PacifiCorp 2024 VMA Report of WMP Vegetation Management Initiatives

Vegetation Management Initiative	Utility Initiative Tracking ID	VMA Report Determination
8.2.2 Vegetation Management Inspections	8.2.2.1 Detailed Inspection - Distribution (VM-01)	Complete

Vegetation Management Initiative	Utility Initiative Tracking ID	VMA Report Determination
8.2.2.1 Detailed Inspections	8.2.2.1 Detailed Inspection - Transmission (VM-02)	Complete
8.2.2.2 Patrol Inspections	8.2.2.2 Patrol Inspections-Distribution (VM-03)	Complete
8.2.2.2 Patrol Inspections	8.2.2.2 Patrol Inspections-Transmission (VM-04)	Complete
8.2.3.1.1 Wood and Slash Management	No Utility Tracking ID; Narrative and quantitative statements assessed	Deficient
8.2.3.1.2 Pole Clearing	8.2.3.1.2 Pole Clearing (VM-05)	Deficient
8.2.3.2 Clearance	No Utility Tracking ID; Narrative and quantitative statements assessed	Deficient
8.2.3.3 Fall-In Mitigation	8.2.3.3 Identifies and Address Hazard Trees (VM-08)	Complete
8.2.3.4 Substation Defensible Space	No Utility Tracking ID; Narrative and quantitative statements assessed	Complete
8.2.3.5 High-Risk Species	No Utility Tracking ID; Narrative and quantitative statements assessed	Deficient
8.2.3.6 Fire Resilient Right-of-Ways	No Utility Tracking ID; Narrative and quantitative statements assessed	Complete

Vegetation Management Initiative	Utility Initiative Tracking ID	VMA Report Determination
8.2.3.7 Emergency Response Vegetation Management	No Utility Tracking ID; Narrative and quantitative statements assessed	Complete
8.2.4. Vegetation Management Enterprise System	No Utility Tracking ID; Narrative and quantitative statements assessed	Complete
8.2.5. Quality Assurance and Quality Control	8.2.5 QA/QC – Post-Audits Distribution and Transmission (Patrol) (VM-11)	Deficient ¹⁰⁵
8.2.6 Open Work Orders	No Utility Tracking ID; Narrative and quantitative statements assessed	Deficient
8.2.7 Workforce Planning	No Utility Tracking ID; Narrative and quantitative statements assessed	Complete

¹⁰⁵ While PacifiCorp did achieve the targets associated with VM-11, it did not complete other narrative statements under 8.2.5. Quality Assurance and Quality Control. Therefore, Energy Safety found the overall initiative to be deficient. See Appendix A.

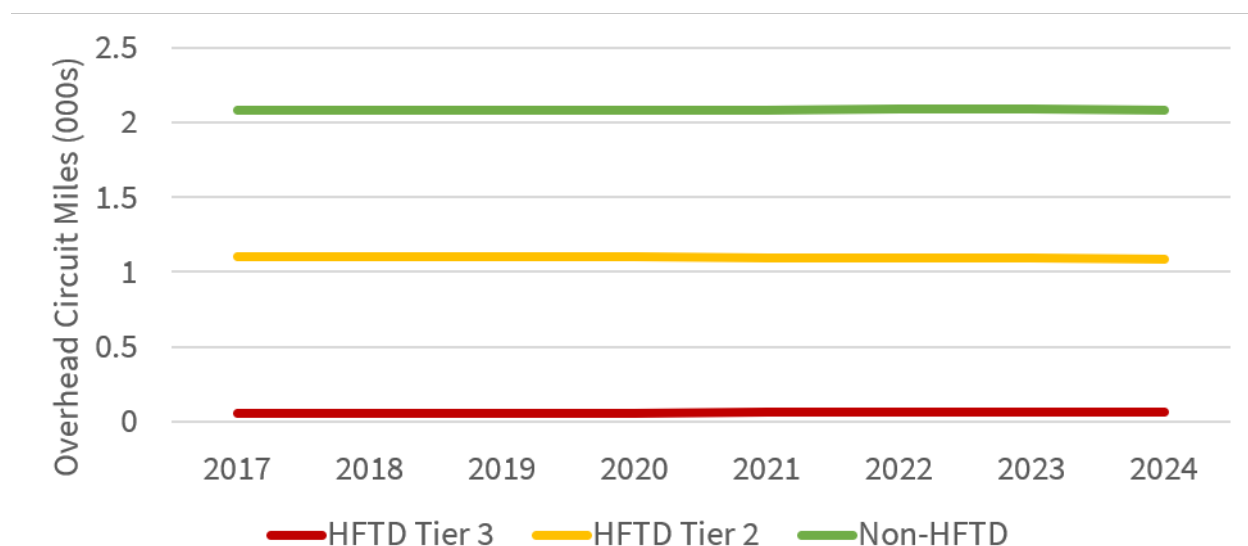
Appendix C: Normalizing Metrics and Raw Count Data

Data for this appendix comes from the QDRs and the DR-283 Response, as reported by PacifiCorp.¹⁰⁶ Overhead circuit miles are used to estimate rates for ignition risk metrics. Raw counts of ignition risk metrics and PSPS event metrics are also presented in this appendix.

Overhead Circuit Miles

The number of overhead circuit miles (OCM) has generally stayed the same between 2017 and 2024 (Figure 20).

Figure 20. PacifiCorp Overhead Circuit Miles (2017-2024) by HFTD Tier

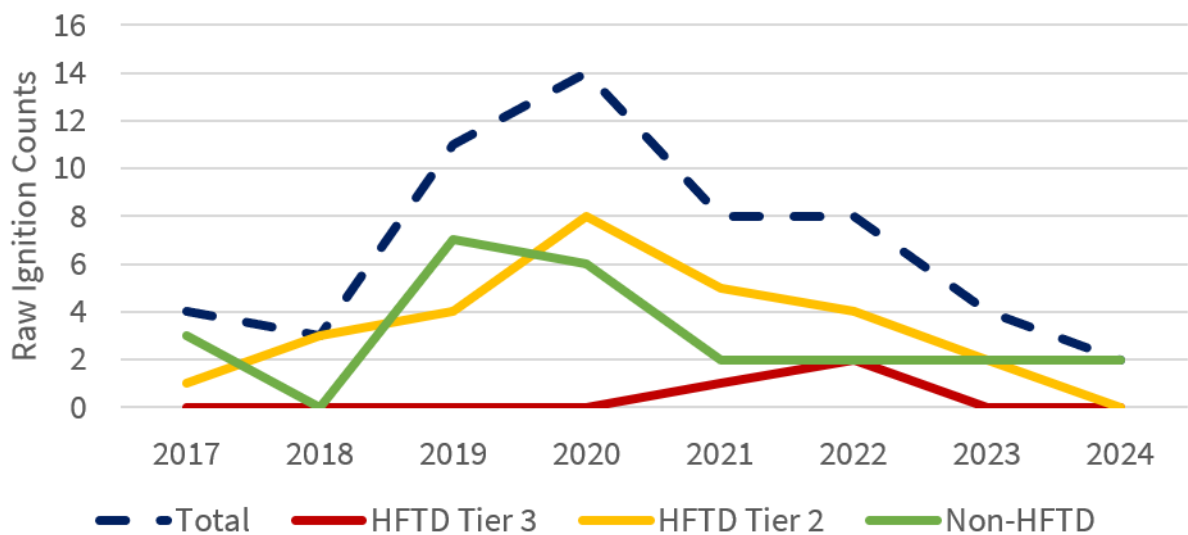


¹⁰⁶2023 Q3 QDR, Table 6, 7.1, 7.2, 8; 2023 Q4 QDR, Table 4, 5, 6, and 7; and DR-283 Response.

Raw Ignition Event Counts

PacifiCorp's raw ignition counts increased from 2018 through 2020, peaking at approximately 14 total ignition events, before declining steadily through 2024 to approximately three events. HFTD Tier 2 and Non-HFTD ignition events accounted for the largest share of the total across most of the 2017–2024 period. HFTD Tier 2 peaked at approximately eight events in 2020, while Non-HFTD ignitions were the primary contributor in 2019–2020 and remained consistently at approximately two events from 2021–2024. HFTD Tier 3 recorded minimal ignition activity across all years, with events recorded only in 2021–2022 (Figure 21).

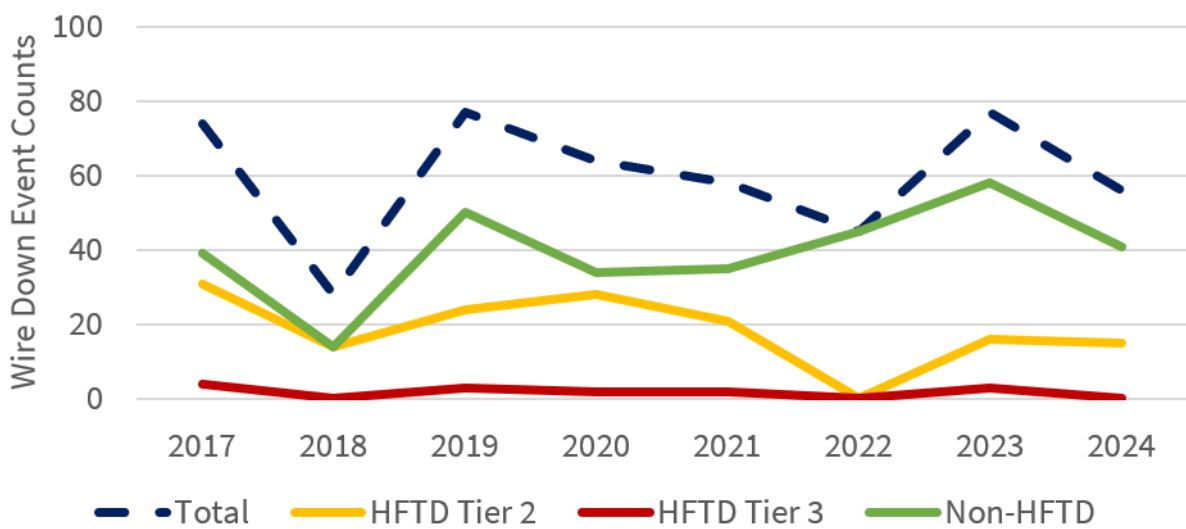
Figure 21. PacifiCorp Ignition Event Counts (2017-2024) by HFTD Tier



Raw Wire Down Event Counts

PacifiCorp's wire down event counts were variable across the 2017–2024 period, declining from approximately 74 events in 2017 to a low of approximately 28 events in 2018, before rising to peaks of approximately 77 events in both 2019 and 2023, and declining to approximately 56 events in 2024. Non-HFTD wire down events consistently accounted for the largest share of the total throughout the period, ranging between approximately 14 and 58 events annually. HFTD Tier 2 ranked second, ranging between 0 and approximately 31 events, while HFTD Tier 3 recorded negligible wire down activity across all years, never exceeding approximately five events (Figure 22).

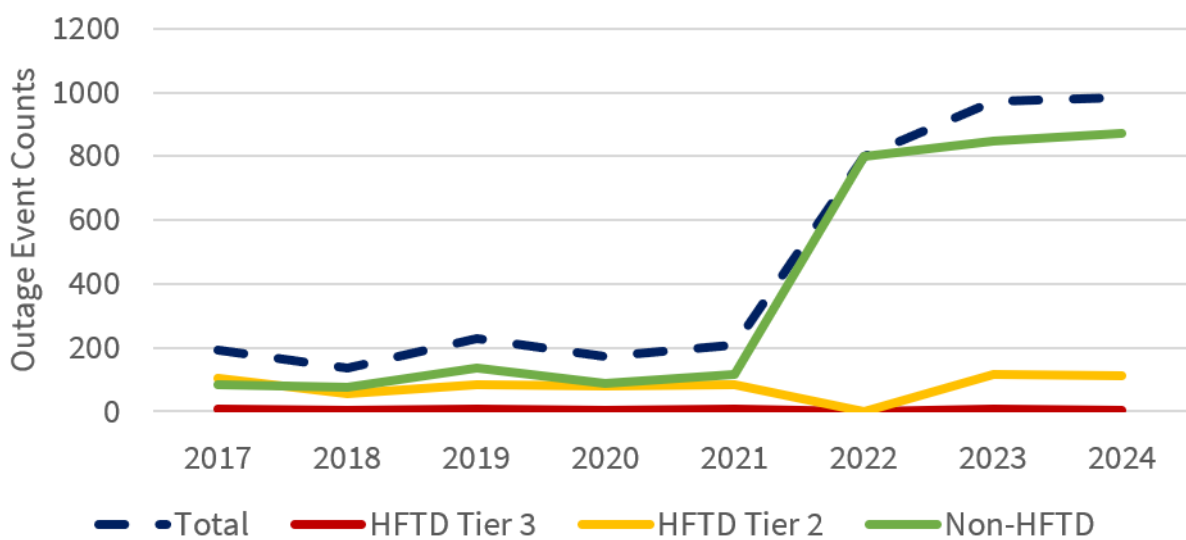
Figure 22. PacifiCorp Wire Down Event Counts (2017-2024) by HFTD Tier



Raw Outage Event Counts

PacifiCorp's outage event counts increased sharply across the 2021–2024 period, rising from approximately 207 events in 2021 to approximately 798 events in 2022 — driven almost entirely by an increase in Non-HFTD outage activity — and continuing to rise to approximately 984 events by 2024. Non-HFTD outage events consistently accounted for the majority of total counts throughout the 2022–2024 period, ranging between approximately 798 and 871 events annually and representing the primary driver of the increase observed after 2021. HFTD Tier 2 ranked second, ranging between approximately 0 and 110 events, while HFTD Tier 3 recorded negligible outage activity across all years (Figure 23).

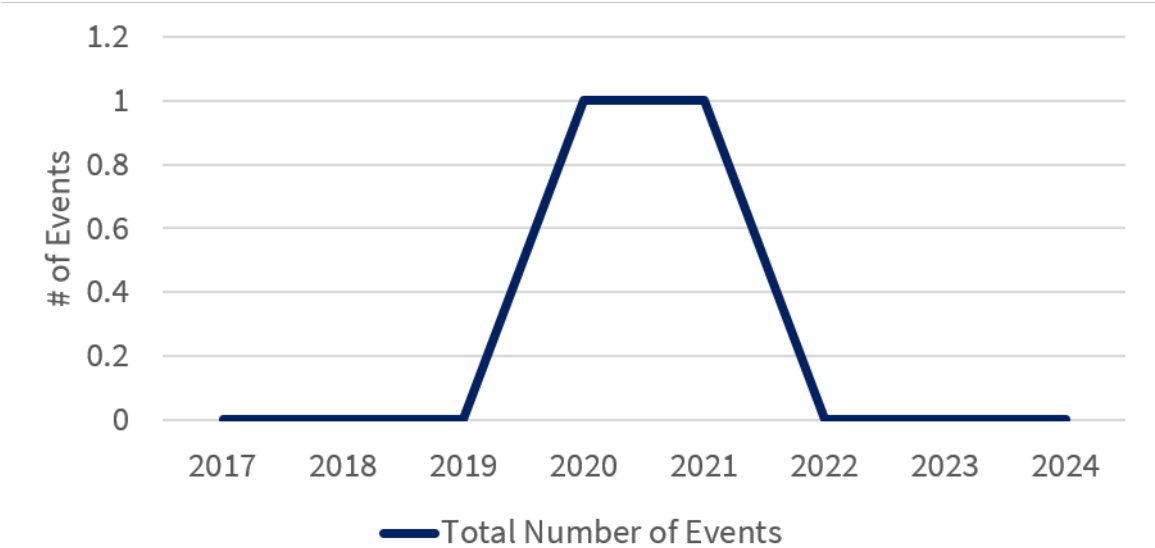
Figure 23. PacifiCorp Outage Event Counts (2017-2024) by HFTD Tier



Frequency of PSPS Events

PacifiCorp recorded zero PSPS events from 2017 through 2019, followed by 1 PSPS event in each of 2020 and 2021, before returning to zero events in 2022 and remaining at zero through 2024. The absence of PSPS activity in the most recent three years of the 2017–2024 period is consistent with the near-zero values observed across all other PacifiCorp PSPS metrics during that same timeframe (Figure 24).

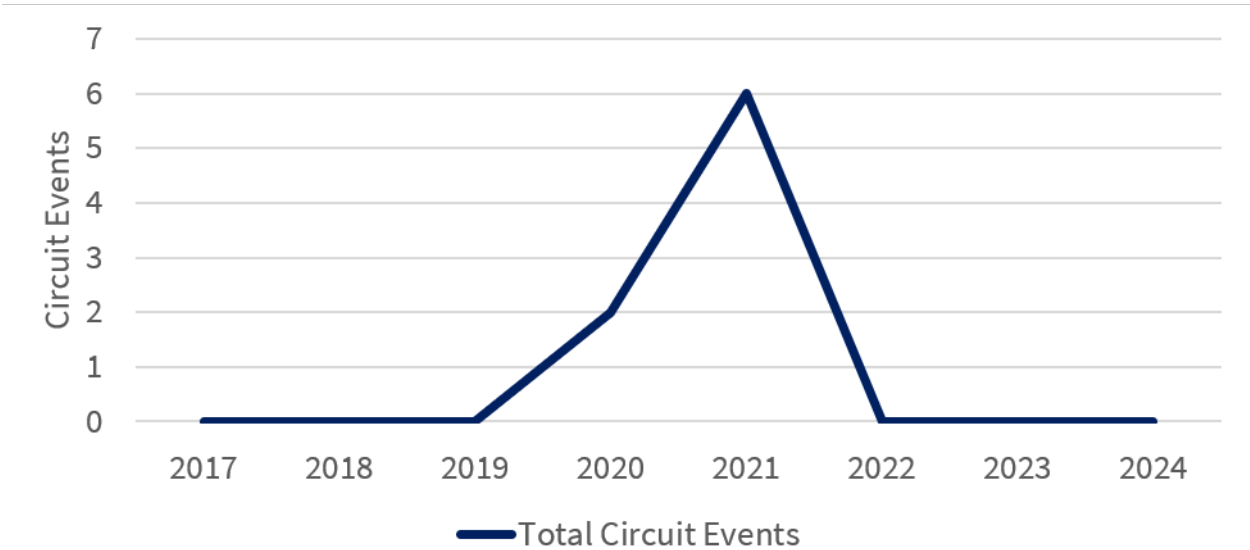
Figure 24. PacifiCorp PSPS Events Frequency (2017-2024)



Scope of PSPS Events

PacifiCorp recorded zero PSPS circuit events from 2017 through 2018, before rising to 2 circuit event in 2020 and 6 circuit events in 2021 — the highest value recorded across the 2017–2024 period — before declining sharply to zero in 2022–2024 (Figure 25).

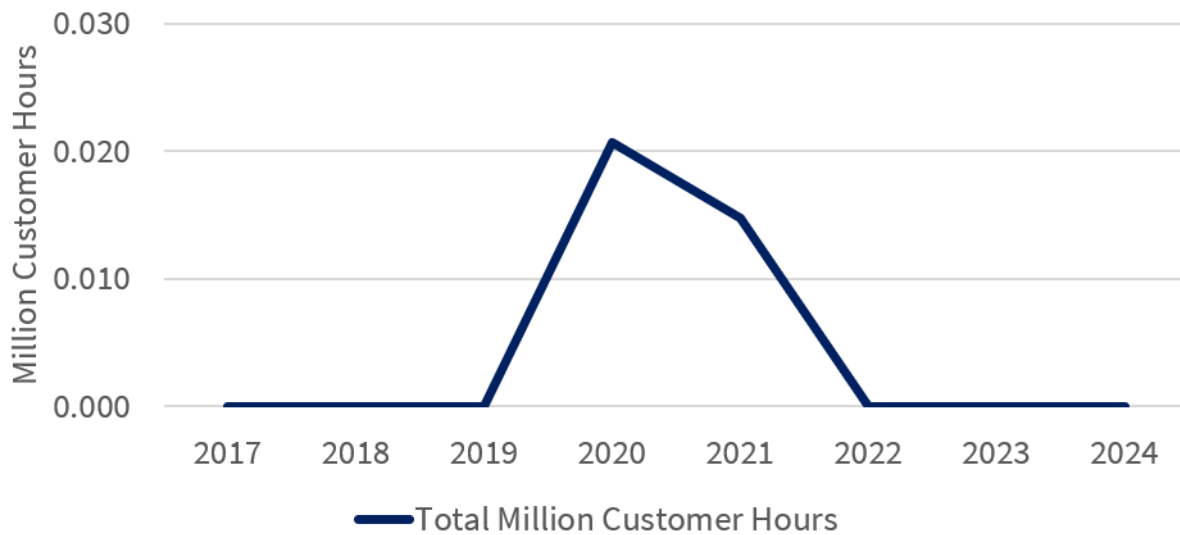
Figure 25. PacifiCorp PSPS Event Scope (2017-2024)



Duration -Customers of PSPS Events

PacifiCorp had an increase in PSPS event duration in 2020 to approximately 0.021 million customer hours (or approximately 20,674 customer hours) in 2020 before declining to approximately 0.015 million customer hours (or approximately 14,791 customer hours) in 2021 and dropping sharply to zero in 2022-2024 (Figure 26).

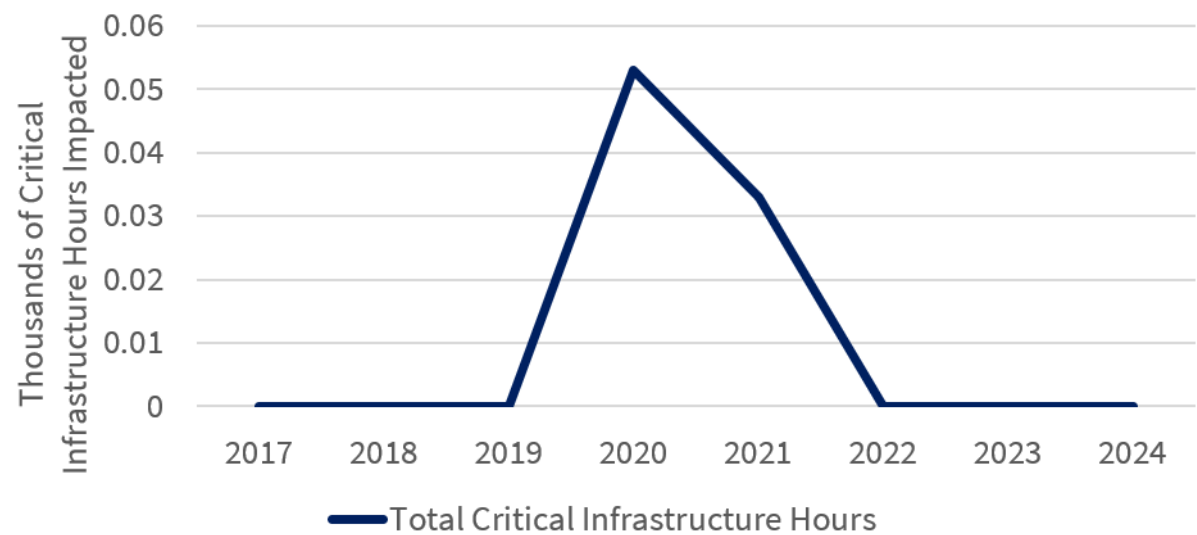
Figure 26. PacifiCorp PSPS Event Duration (2017-2024)



Duration -Critical Infrastructure of PSPS Events

PacifiCorp PSPS event impacts on critical infrastructure increased to approximately 53 critical infrastructure hours impacted in 2020 before declining to approximately 33 critical infrastructure hours in 2021 and dropping to zero in 2022-2024 (Figure 27).

Figure 27. PacifiCorp PSPS Event Impacts on Critical Infrastructure (2017-2024)



Impacts of PSPS Events

PacifiCorp recorded zero PSPS customers impacted from 2017 through 2018, before rising sharply to approximately 2,599 customers impacted in 2020 before declining to approximately 1,953 customers impacted in 2021 and dropping sharply to zero in 2022-2024 (Figure 28).

Figure 28. PacifiCorp PSPS Event Impacts (2017-2024)

