

October 15, 2026

VIA ELECTRONIC FILING

Docket #2024-EC_ARC

Patrick Doherty
Program Manager, Performance Assessment Division
California Office of Energy Infrastructure Safety
715 P Street 15th Floor
Sacramento, CA 95814

**RE: PacifiCorp Comments on the California Office of Energy Infrastructure Safety's
2024 Annual Performance Report**

Dear Mr. Doherty,

PacifiCorp respectfully submits these comments in response to the California Office of Energy Infrastructure Safety's (Energy Safety) issuance of the company's 2024 Annual Performance Report (Performance Report) on October 1, 2026.

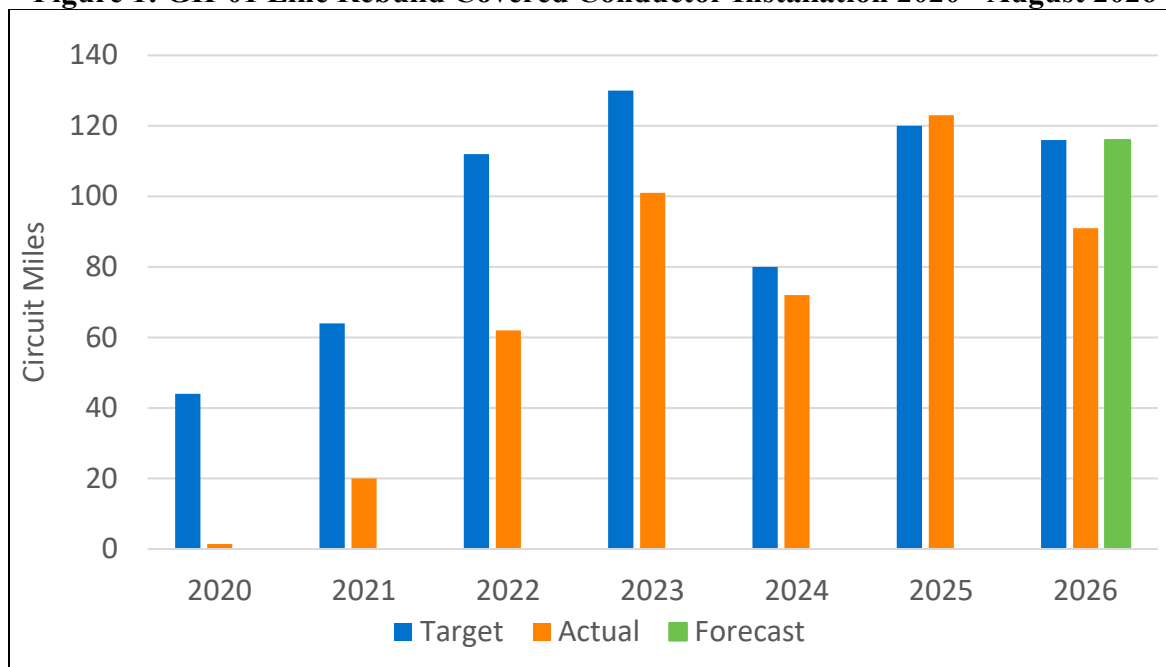
PacifiCorp will address the following in the comments:

GH-01 Line Rebuild - Covered Conductor Installation

PacifiCorp acknowledges that it did not meet its 2024 80-mile GH-01 target but completed 90% (72 miles) of the target by the year's end. PacifiCorp completed the remaining eight miles in the first quarter of 2025.

As shown in Figure 1 below, PacifiCorp has demonstrated year-over-year improvement in meeting its GH-01 targets. Between 2023 and 2024, PacifiCorp went from 78% target achievement to 90% target achievement. In 2025, PacifiCorp exceeded its target, completing 123 miles of 120 miles planned. Through the end of August 2026, PacifiCorp completed 78% of its 2026 target and was on track to meet its 2026 target of 116 miles.

Figure 1: GH-01 Line Rebuild Covered Conductor Installation 2020 - August 2026



As shown in Table 1 below, cumulatively the company has completed line rebuilds for substantial amounts of distribution infrastructure within the Tier 3 and Tier 2 High Fire Threat Districts (HFTD). As of the end of August 2026, PacifiCorp strengthened nearly all distribution miles (99.7%) within its Tier 3 High Fire Threat District (HFTD), and 43.4% of its Tier 2 HFTD.

Table 1: GH-01 Covered Conductor Installation Completed by Risk Area 2020-August 2026

Risk area	Total circuit miles	Strengthened circuit miles	% of total
HFTD Tier 3	39.8	39.7	99.7%
HFTD Tier 2	750.6	325.8	43.4%
HFRA	478.5	25.5	5.3%
Non-HFTD/HFRA	1,200.2	7.9	0.7%
Total	2,469	398.8	16.2%

In addition to achieving substantial coverage in these areas of elevated risk, the company recently made significant advancements in its risk modeling and mitigation planning capabilities through the development of Planning Model Version 2 to support enhanced prioritization of line rebuild projects while balancing risk reduction and cost. Planning Model Version 2 and its outputs will be introduced in the 2028-2030 Wildfire Mitigation Plan that will be filed in April 2027.

GH-04 Installation of System Automation Equipment

PacifiCorp acknowledges it did not meet the 2024 target and in 2025 made efforts to improve delivery of system automation targets. As a result, the company completed the installation of the nine devices not installed in 2024 and completed the ten installations targeted for 2025, plus four additional devices, for a total of 23 devices installed in 2025, exceeding the 2025 target.

Substantiation of Vegetation Management Program Targets

PacifiCorp recognizes the concerns raised in the Performance Report and Vegetation Management Audits (VMAs) regarding data tracking and reporting quality gaps for its Vegetation Management program. The company acknowledges the importance of robust quality control/ quality assurance (QA/QC) processes and the need to provide reliable, high-quality information to ensure its wildfire mitigation program can be confidently assessed and independently verified. As discussed below, PacifiCorp has and continues to pursue solutions to address and close its data tracking and reporting gaps.

Many of the data quality challenges within the Vegetation Management program are rooted in issues related to the program's mobile data management system (MDMS). Tracking, organizing, optimizing and reporting vegetation management work begins with the systematic and structured collection of data from the field. The design and capabilities of the MDMS software used to collect, organize and process field data is crucial to downstream review and reporting processes.

Following the 2022 selection of a new MDMS vendor for use by Berkshire Hathaway Energy (BHE) affiliates, PacifiCorp anticipated transitioning to a new MDMS with enhanced data tracking and reporting quality and expanded data collection capabilities to meet evolving program and regulatory requirements. In spring 2024, PacifiCorp began working with the new vendor to configure the MDMS to meet company requirements, pilot, test, train PacifiCorp personnel and fully integrate the software with the vegetation management program. After extending the transition timeline multiple times to resolve issues PacifiCorp identified during the MDMS development and staging processes, PacifiCorp began using the new MDMS in fall 2025. Although the new MDMS included new data collection and organizing capabilities intended to address program tracking and reporting gaps, functionality issues with the new MDMS led the company to decide to revert back to its legacy MDMS in April 2026.

Through the spring and summer of 2026, PacifiCorp worked with both its legacy MDMS vendor to develop immediate improvements for the legacy MDMS and with the new MDMS vendor to resolve functionality issues with the new MDMS. In October 2026, PacifiCorp implemented changes to its legacy MDMS to help address tracking and reporting requirements related to work prioritization, wood and slash management, and pole clearing, in preparation for execution of 2027 vegetation management initiatives.

Reporting Accuracy and Completeness Performance

PacifiCorp acknowledges that data collection and data quality have been a persistent source of concern for Energy Safety in annual performance reports¹. The company recognizes that addressing these concerns requires attention to both the underlying source data and the processes used to prepare regulatory submissions.

A primary focus has been supporting subject matter experts' understanding of reporting requirements and their role in identifying potential data issues before information is provided for quarterly data report (QDR) preparation. Through ongoing guidance and coordination, PacifiCorp has emphasized reviewing source information against applicable reporting requirements and identifying discrepancies earlier in the reporting process.

In parallel, PacifiCorp is working with a vendor to leverage technology to develop a structured data model with the objective to strengthen the foundation for data preparation and review by defining relevant data objects, their attributes, and relationships. This work is intended to support consistent organization of source information and alignment with required reporting schemes.

These activities reflect ongoing efforts to address the reporting issues identified in the Annual Performance Report.

PacifiCorp is also discussing data collection and governance approaches with other California electrical corporations to learn from their experiences and identify practices that may be applicable to its reporting processes. These discussions complement the company's internal efforts to better understand reporting challenges and potential improvements.

PacifiCorp is scoping a broader data governance initiative for consideration in the 2028–2030 Wildfire Mitigation Plan, informed by the reporting concerns identified by Energy Safety and the company's continuing evaluation of its data processes. The company would welcome the opportunity to meet with Energy Safety to discuss their concerns regarding data governance and reporting to ensure PacifiCorp's data governance improvements meet expectations.

PacifiCorp appreciates the opportunity to provide comments on the 2024 Annual Performance Report and will take the lessons learned from the report as areas of focus in the 2028-2030 Wildfire Mitigation Plan. If you have questions, or require additional information, please contact Melissa.Swenson@PacifiCorp.com.

Sincerely,

/s/ Melissa Swenson

Melissa Swenson

Director, Wildfire Mitigation Program Delivery

Melissa.Swenson@PacifiCorp.com

¹ California Office of Energy Infrastructure Safety. 2024 Annual Performance Report: PacifiCorp. Pages 46-53.