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October 23, 2026

VIA ELECTRONIC FILING

Docket # 2025 NODI

Patrick Doherty
Program Manager
Performance Assessment Division
Office of Energy Infrastructure Safety
715 P Street, 15th Floor
Sacramento, CA 95814
Patrick.Doherty@energysafety.ca.gov

RE: PacifiCorp's Response to Notice of Data Inaccuracy - NODI_PAD_PC_20260519_SYSTEMAUTO

Dear Patrick Doherty:

PacifiCorp provides the following response to the findings identified in Notice of Data Inaccuracy NODI_PAD_PC_20260519_SYSTEMAUTO (NODI), issued by the Office of Energy Infrastructure Safety (Energy Safety) on September 30, 2026. From May 19, 2026, to May 21, 2026, Energy Safety inspected PacifiCorp's 2025 Q4 WMP initiatives in the vicinity of Etna and Yreka, California.

Energy Safety identified the following data inaccuracies:

Data Inaccuracy 1. Record ID PAD_PC_CYA_20260519_1312; IOU-provided Structure ID: 06242009.0106101; coordinates 41.500039881359655, -122.86415653840032. Energy Safety reported that no system automation equipment was observed at the submitted location for WMP initiative 8.1.2.8, Installation of system automation equipment (2025 Q4).

Data Inaccuracy 2. Record ID PAD_PC_CYA_20260519_1337; IOU-provided Structure ID: 06242009.0110401; coordinates 41.50487623805265, -122.857270640835. Energy Safety reported that no system automation equipment was observed at the submitted location for WMP initiative 8.1.2.8, Installation of system automation equipment (2025 Q4).

Data Inaccuracy 3. Record ID PAD_PC_RMA_20260519_1416; IOU-provided Structure ID: 06242009.0111902; coordinates 41.511444464309065, -122.8555101376506. Energy Safety reported that no system automation equipment was observed at the submitted location for WMP initiative 8.1.2.8, Installation of system automation equipment (2025 Q4).

Data Inaccuracy 4. Record ID PAD_PC_RMA_20260521_0919; IOU-provided Structure ID: 06245007.0229641; coordinates 41.73780588401379, -122.63275048783626. Energy Safety reported that no system automation equipment was observed at the submitted location for WMP initiative 8.1.2.8, Installation of system automation equipment (2025 Q4).

Data Inaccuracy 5. Record ID PAD_PC_CYA_20260521_0920; IOU-provided Structure ID: 06245007.0228545; coordinates 41.7362267167895, -122.635394624455. Energy Safety reported that no system automation equipment was observed at the submitted location for WMP initiative 8.1.2.8, Installation of system automation equipment (2025 Q4).

Data Inaccuracy 6. Record ID PAD_PC_IAG_20260521_1202; IOU-provided Structure ID: 06245007.0227545; coordinates 41.73667123557792, -122.6370776888446. Energy Safety reported that no system automation equipment was observed at the submitted location for WMP initiative 8.1.2.8, Installation of system automation equipment (2025 Q4).

Data Inaccuracy 7. Record ID PAD_PC_IAG_20260521_1528; IOU-provided Structure ID: 06245007.0218707; coordinates 41.7392205044699, -122.65340108900726. Energy Safety reported that no system automation equipment was observed at the submitted location for WMP initiative 8.1.2.8, Installation of system automation equipment (2025 Q4).

Data Inaccuracy 8. Record ID PAD_PC_IAG_20260521_1552; IOU-provided Structure ID: 06245007.0222206; coordinates 41.73228332138991, -122.6463764780706. Energy Safety reported that no system automation equipment was observed at the submitted location for WMP initiative 8.1.2.8, Installation of system automation equipment (2025 Q4).

Data Inaccuracy 9. Record ID PAD_PC_IAG_20260521_1604; IOU-provided Structure ID: 06245007.0226441; coordinates 41.7344680627637, -122.63966014470972. Energy Safety reported that no system automation equipment was observed at the submitted location for WMP initiative 8.1.2.8, Installation of system automation equipment (2025 Q4).

Data Inaccuracy 10. Record ID PAD_PC_IAG_20260521_1614; IOU-provided Structure ID: 06245007.0226542; coordinates 41.73574264218975, -122.63846628209087. Energy Safety reported that no system automation equipment was observed at the submitted location for WMP initiative 8.1.2.8, Installation of system automation equipment (2025 Q4).

PacifiCorp Response to Data Inaccuracies 1-10:

PacifiCorp provides this consolidated response to Data Inaccuracies 1-10 concerning initiative 8.1.2.8, Installation of system automation equipment (GH-04).

PacifiCorp's original fourth-quarter 2025 Quarterly Data Report submission was accompanied by a cover letter dated February 3, 2026. Following Energy Safety's May 19-21, 2026, inspections, PacifiCorp submitted revisions described in its August 5, 2026, cover letter, docketed on August 7, 2026, in the 2025 Data Submissions docket. That filing identifies revisions to the fourth-quarter 2025 spatial data for GH-04.

The records associated with Data Inaccuracies 1-10 were incorrectly grouped under initiative 8.1.2.8, Installation of system automation equipment (GH-04). These records did not belong under that initiative and were removed from the revised spatial dataset.

The August 5, 2026, revision cover letter, docketed August 7, 2026, is provided as Attachment 1 (TN18415). The originally submitted fourth-quarter 2025 spatial data set is provided as Attachment 2, and the revised fourth-quarter 2025 spatial data set is provided as Attachment 3. Both spatial datasets are provided as zipped geodatabases.

Attachments:

Attachment 1: Attach_NODI_PAD_PC_20260519_SYSTEMAUTO_1.pdf - August 5, 2026, QDR revision cover letter (TN18415).

Attachment 2: Attach_NODI_PAD_PC_20260519_SYSTEMAUTO_2_Original.gdb.zip

Originally submitted fourth-quarter 2025 spatial geodatabase.

Attachment 3: Attach_NODI_PAD_PC_20260519_SYSTEMAUTO_3_Resubmission.gdb.zip

Resubmitted fourth-quarter 2025 spatial geodatabase.

PacifiCorp appreciates the opportunity to provide this response to Energy Safety's NODI_PAD_PC_20260519_SYSTEMAUTO.

Please refer any questions to Chelsey Roth, Regulatory Affairs Project Manager at 503-813-6895 or via email at Chelsey.Roth@pacificorp.com and californiadockets@pacificorp.com.

Sincerely,



Melissa Swenson
Director, Wildfire Mitigation Program Delivery

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