



May 21, 2026

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## **NOTICE OF NON-PERFORMANCE**

Ms. Carrie Laird:

Pursuant to Government Code section 15472, et seq, the Office of Energy Infrastructure Safety (Energy Safety) conducted inspections of work completed by PacifiCorp in accordance with its 2025 Wildfire Mitigation Plan (WMP). During the inspections, Energy Safety determined the existence of non-performance requiring correction. Energy Safety therefore issues PacifiCorp a Notice of Non-Performance (NON).

On May 13, 2026, Energy Safety conducted an inspection of PacifiCorp's WMP initiatives in the vicinity of Seiad Valley, California in High Fire Threat District (HFTD) Tier 2 and State Responsibility Area (SRA). The inspection report is enclosed herewith. Energy Safety found the following deficiency:

Deficiency 1. Energy Safety observed that PacifiCorp failed to implement its 2025 WMP initiative 8.2.3.3 Fall-In Mitigation, by not removing a dead, rotten, or diseased tree near coordinates 41.8311663903587, -123.172164580112. Energy Safety considers this non-performance to be in the Moderate risk category. PacifiCorp must complete a corrective action for this non-performance by six months from the date of this notice.<sup>1</sup>

Within 30 days from the issuance date of this NON, PacifiCorp must provide a response advising Energy Safety of corrective actions taken or planned to remedy the identified deficiency.

This response shall be filed in the Energy Safety e-Filing system under the 2025 NON Docket<sup>2</sup> and the associated file name(s) must begin with the NON identification number.

Prior to its response, PacifiCorp may request an informal conference with Energy Safety for the purpose of disputing any issues raised in this NON no later than 10 business days before the response deadline.<sup>3</sup> Requests

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<sup>1</sup> Gov. Code section 15475.2(a)(2)

<sup>2</sup> <https://efiling.energysafety.ca.gov/EFiling/DocketInformation.aspx?docketnumber=2025%20NON>

<sup>3</sup> Energy Safety Performance Guidelines, p. 4

for informal conference with Energy Safety must be e-mailed to [environmentalscience@energysafety.ca.gov](mailto:environmentalscience@energysafety.ca.gov), with a copy sent to me and Akiko Masuda, [Akiko.Masuda@energysafety.ca.gov](mailto:Akiko.Masuda@energysafety.ca.gov).

Sincerely,

*Elizabeth McAlpine*

Elizabeth McAlpine

Supervisory Environmental Scientist | Environmental Science Division

Office of Energy Infrastructure Safety

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# INSPECTION REPORT

## Overview

The Office of Energy Infrastructure Safety (Energy Safety) conducts field inspections to verify the work performed by an electrical corporation as reported in an approved Wildfire Mitigation Plan (WMP), and to assess general conditions of electrical infrastructure that may adversely impact an electrical corporation’s wildfire risk. A Notice of Non-Performance (NON) is issued for any instances of non-performance identified during an inspection of its WMP initiatives.

Energy Safety has designated this finding of a deficiency as a “Moderate” risk. PacifiCorp must correct the deficiency pursuant to the timeline provided in Table 1.<sup>4</sup>

**Table 1. Risk Category and Correction Timelines**

Risk Category	Deficiency correction timeline
Severe	<ul style="list-style-type: none"><li>• Immediate resolution</li></ul>
Moderate	<ul style="list-style-type: none"><li>• 2 months (in High Fire Threat District (HFTD) Tier 3)</li><li>• 6 months (in HFTD Tier 2)</li><li>• 6 months (if relevant to worker safety; not in HFTD Tiers 2 or 3)</li></ul>
Minor	<ul style="list-style-type: none"><li>• 12 months</li></ul>

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<sup>4</sup> Energy Safety Performance Guidelines, p. 4



# Inspection Summary

Energy Safety found a “Moderate” deficiency near coordinates 41.8311663903587, -123.172164580112 in HFTD Tier 2. PacifiCorp failed to remove the danger tree.<sup>5</sup>

The inspection location and WMP initiative summary are included in Table 2.

***Table 2: Inspection Location and Initiative Summary***

Electrical Corporation:	PacifiCorp
Report Number:	NON_ESD_PC_MAZ_20260513_1021
Inspector:	Max Zazzeron
WMP Year Inspected:	2025
Quarterly Data Report (QDR) Referenced:	Quarter 4 (Q4) 2025
Inspection Selection:	Energy Safety inspected the locations based on PacifiCorp’s Q4 QDR.
Relevant WMP Initiative(s):	8.2.3.3 Fall-In Mitigation
Date of inspection:	May 13, 2026
City and/or County of Inspection:	Seiad Valley, California

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<sup>5</sup> PacifiCorp “2023-2025 Wildfire Mitigation Plan R6” published January 17, 2025. P. 220-221 (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57823&shareable=true> accessed May 19, 2026)

# Inspection Findings

## Deficiency 1

### **Relevant Requirements:**

PacifiCorp's WMP Initiative 8.2.3.3 Fall-In Mitigation states: "PacifiCorp's existing [Standard Operating Procedure] SOPs require the removal of hazard trees. Consistent with California law, removal is required when "dead, rotten, or diseased trees or dead, rotten or diseased portions of otherwise healthy trees overhang or lean toward and may fall into a span of supply or communication lines" Furthermore, the SOP encourages removal, when allowed, even when removal is not required under GO 95, Rule 35, or PRC § 4293."<sup>6</sup>

PacifiCorp's Transmission & Distribution Vegetation Management Program SOP defines hazard trees as "dead, dying, diseased, deformed, or unstable trees which have a high probability of falling and contacting a substation, distribution or transmission conductors, structure, guys or other Company electric facility."<sup>7</sup>

### **Findings:**

Energy Safety considers this deficiency as "Moderate" because PacifiCorp has not removed the dying pine tree located within striking distance of conductors, consistent with the requirements of Public Resources Code section 4293. The existence of this tree presents an ongoing wildfire risk.

On May 13, 2026, Energy Safety conducted an inspection of PacifiCorp's WMP initiatives in the vicinity of Seiad Valley, California. During the inspection, Energy Safety identified a dying pine tree near pole ID06246011.0181505 and near coordinates 41.8311663903587, -123.172164580112 along Walker Creek Road. The pine tree is located within HFTD Tier 2 and SRA. The pine tree has a diameter at breast height of 22 inches and is approximately 80 feet tall. It is located approximately 15 feet northeast of the conductors at 0.5 span southeast of pole ID 06246011.0181505. It exhibits yellowing needles throughout the canopy and visible crown dieback. The inspector's observations are documented in Exhibit A photographs, which are attached to this report. Photo 1 depicts pole ID 06246011.0181505. Photos 2, 3, and 4 depict the dying pine tree.

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<sup>6</sup> PacifiCorp "2023-2025 Wildfire Mitigation Plan R6" published January 17, 2025. P. 220-221 (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57823&shareable=true> accessed May 19, 2026)

<sup>7</sup> PacifiCorp "Vegetation Standard Operating Procedure" published July 1, 2017. P. 129 ([https://pacificorp.com/content/dam/pcorp/documents/en/pacificorp/wildfire-mitigation/responses-issued/2017\\_Vegetation\\_SOP.pdf](https://pacificorp.com/content/dam/pcorp/documents/en/pacificorp/wildfire-mitigation/responses-issued/2017_Vegetation_SOP.pdf), accessed May 20, 2026)

# Exhibits

Exhibit A: Photo Log

Structure ID: 06246011.0181505

Deficiency 1



Photo 2: Photo of pole ID 06246011.0181505.



Photo 2: Photo of the dying pine tree with yellowing needles throughout the canopy and visible crown dieback.



Photo 3: Photo of the dying pine tree located approximately 15 feet northeast of the primary conductors.



Photo 4: Photo of the dying pine tree located southeast of pole ID 06246011.0181505.