State of California – A Natural Resources Agency
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Gavin Newsom, Governor
Forest Kaser, Director

September 24, 2026

Carrie Laird
VP of Wildfire Mitigations and Emergency Operations
PacifiCorp
825 NE Multnomah, Suite 1700
Portland, OR 97232

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 2026 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 September 22, 2026, Energy Safety conducted an inspection of PacifiCorp's WMP initiatives in the vicinity of the city of Cedarville, California in High Fire Threat District (HFTD) Tier 2 and Federal Responsibility Area (FRA). The inspection report is enclosed herewith. Energy Safety found the following deficiency:

Deficiency 1. Energy Safety observed that PacifiCorp failed to implement its 2026 WMP initiative Routine Clearance 9.2.1.3, which requires compliance with General Order (GO) 95, by not maintaining a four-foot clearance distance around the primary conductors near pole ID 06142015.0030901 at coordinates 41.540509, -120.23388. The Douglas fir tree shows burn marks indicating the possibility of prior contact with, or arcing from, the conductor. 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.[1]

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 2026 NON Docket[2] and the associated file name(s) must begin with the NON identification number.

[1] Gov. Code section 15475.2(a)(2)
[2] https://efiling.energysafety.ca.gov/EFiling/DocketInformation.aspx?docketnumber=2026%20NON

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.[3] Requests for informal conference with Energy Safety must be e-mailed to environmentalscience@energysafety.ca.gov, with a copy sent to me and Ricardo Garcia, Ricardo.Garcia@energysafety.ca.gov.

Sincerely,

Elizabeth McAlpine

Elizabeth McAlpine
Supervisory Environmental Scientist | Environmental Science Division
Office of Energy Infrastructure Safety
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[3] Energy Safety Performance Guidelines, p. 4

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.[4]

Table 1. Risk Category and Correction Timelines

Risk Category	Deficiency correction timeline
Severe	• Immediate resolution
Moderate	• 2 months (in High Fire Threat District (HFTD) Tier 3) • 6 months (in HFTD Tier 2) • 6 months (if relevant to worker safety; not in HFTD Tiers 2 or 3)
Minor	• 12 months

[4] Energy Safety Performance Guidelines, p. 4

Inspection Summary

Energy Safety found a "Moderate" deficiency near pole ID 06142015.0030901 in HFTD tier 2. PacifiCorp failed to maintain the required four-foot clearance distance around the primary conductors.[5] The Douglas fir tree appears to have burn marks indicating the possibility of prior contact with, or arcing from, the conductor.

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_RGA_20260922_1304
Inspector:	Ricardo Garcia
WMP Year Inspected:	2026
Quarterly Data Report (QDR) Referenced:	Quarter 2 (Q2) 2026
Inspection Selection:	Energy Safety inspected the locations based on PacifiCorp's Q2 QDR.
Relevant WMP Initiative(s):	Routine Clearance 9.2.1.3
Date of inspection:	September 22, 2026
City and/or County of Inspection:	Cedarville, California

[5] PacifiCorp, 2026-2028 Base Wildfire Mitigation Plan, Published March 18, 2026, p. 286 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=60433&shareable=true accessed Sept. 22, 2026).

Inspection Findings

Deficiency 1

Relevant Requirement:

PacifiCorp's WMP initiative 9.2.1.3 Routine Clearance states that "vegetation is identified for pruning or removal to achieve minimum post work clearance distances that maintain proper conductor-to-vegetation clearance for compliance with applicable regulations, including GO 95."[6] General Order 95, Rule 35, Table 1, Case 14 requires that PacifiCorp maintain a four-foot minimum clearance distance between all vegetation and conductors for power lines between 750 volts and 22,500 volts.[7]

Findings:

Energy Safety considers this deficiency as "Moderate" because PacifiCorp failed to maintain the required minimum clearance distance between vegetation and its conductors. A Douglas fir tree grew within three feet of the conductors and appears to have burn marks indicating the possibility of prior contact with, or arching from, the conductor. The continued encroachment presents a wildfire risk.

On September 22, 2026, Energy Safety conducted an inspection of PacifiCorp's WMP initiatives in the vicinity of Cedarville, California. During the inspection, Energy Safety observed a Douglas fir tree growing within three feet of conductors near pole ID 06142015.0030901 and near coordinates 41.540509, -120.23388 along California State Route 299. The Douglas fir tree is located within the FRA and HFTD Tier 2. The inspector measured the distance between the primary conductors and the closest branches of the Douglas fir tree using a Nikon Forestry Pro II laser range finder. The measured distance was no more than three feet, and the Douglas fir tree appears to have burn marks from prior contact or arcing with the conductors.

In its 2025 Q2 QDR submission, PacifiCorp reported conducting Detailed Vegetation Inspections under initiative 8.2.2.1 along this conductor between May 5, 2025, and May 14, 2025. PacifiCorp's inspection and subsequent prescription of work, or lack thereof, did not ensure that vegetation does not encroach within the required minimum clearance distance or contact conductors causing potential ignitions. The Douglas fir tree has a diameter at breast height of 16 inches, is approximately 35 feet tall, and is located approximately 100 feet west of pole ID 06142015.0030901. The inspector's observations are documented in Exhibit A photographs which are attached to this report. Photos 1 and 2 depict the fir tree encroaching into the four-foot minimum clearance distance. Photo 3 depicts the burn marks on the fir tree indicating prior contact or arcing with the conductors.

[6] PacifiCorp, 2026-2028 Base Wildfire Mitigation Plan, Published March 18, 2026, p. 286 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=60433&shareable=true accessed Sept. 22, 2026).
[7] General Order 95, Rule 35, Table 1, Case 14 p. III-24 (https://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M550/K438/550438485.pdf accessed Sept. 24, 2026).

Exhibits

Exhibit A: Photo Log

Structure ID: 120859842

Deficiency 1



Photo 1: Photo of Douglas fir tree encroaching within the four-foot minimum clearance distance from the primary conductors.



Photo 2: Additional photo of Douglas fir tree from different angle encroaching within the four-foot minimum clearance distance from the primary conductors.



Photo 3: Close-up photo of burned Douglas fir tree indicating the possibility of prior contact with, or arching from, the conductor.