

2025 Wildfire Mitigation Plan Independent Evaluator Annual Implementation Report

Utility:

PacifiCorp

Submitted by:

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Executive Summary

PacifiCorp, operating as Pacific Power, is a multi-jurisdictional utility serving approximately 47,000 customers in the northern California portion of its service territory. PacifiCorp's service area in California covers a vast stretch of forested wildlife habitats encompassing dense vegetation and sparsely populated community centers with an average of approximately four customers served per square mile. Accordingly, PacifiCorp's service territory stretches across numerous expanses of the California Public Utilities Commission (CPUC) defined High Fire Threat Districts (HFTDs), including Tier 2 (elevated) and Tier 3 (extreme) risk areas.

PacifiCorp has undertaken considerable efforts to prevent ignitions and mitigate the impact of wildfire across its substantial service territory. Through emerging technologies, enhanced mitigation practices, and quality assurance/quality control (QA/QC) processes, PacifiCorp is working to reduce risk for its communities in the face of the growing threat of increased wildfire events and potential proactive de-energization activations as a wildfire prevention measure of last resort. To achieve this risk reduction, PacifiCorp tracks, and monitors activities as they are executed to maintain conditional awareness of controllable risk drivers that may lead to a catastrophic ignition event.

This report includes a review of the wildfire mitigation initiatives that PacifiCorp implemented in 2025 and an accounting of whether PacifiCorp met its performance objective targets, whether it is underfunding any of its initiatives, and whether PacifiCorp is following its QA/QC processes. The independent evaluator (IE) review of these elements determined that PacifiCorp:

- Achieved the reviewed initiative objectives with exceptions highlighted in the Synthesis of Findings for each initiative category, namely Grid Design, Operations, and Maintenance and Vegetation Management and Inspection.
- Funded the portfolio of its initiatives, or provided detailed explanations as to why an initiative was underfunded.
- Adhered to its QA/QC processes, to the degree that they are documented.

1. Key Takeaways

PacifiCorp's **2025 WMP**¹, **2025 WMP Update**², **2025 Q4 QDR**³, **2025 EOY**⁴ and **2025 EC AIR**⁵ were used to identify 49 initiatives. Of those 49 initiatives, the independent evaluator (IE) identified 12 as "Focus Initiatives", six as "Field Verifiable", 22 as "Quantitative", and eight as "Qualitative", while 19 did not have an associated "Quantitative" or "Qualitative" target. In total, four initiatives had findings of "Target Not Met" due to PacifiCorp not meeting their initiative target, one of which received an IE Finding of "Initiative Not Validated" due to the initiative having an Initiative Validate Rate (IVR) of less than 95%. For one initiative, as a result of the confusing reporting system, combined with an IE error in interpreting the data when sampling, the IE could not reach a conclusion on whether PacifiCorp met its targets so it was assigned "Validation Inconclusive", but the IE did identify the target as misleading. Of the 23 "Quantitative" initiatives reviewed 12 initiatives were completed within 5% of the WMP target. **Table 1-1** below illustrates the IE findings for those initiatives that had missed WMP targets, had an IVR less than 95%, or had a lack of (or insufficiency) evidence for qualitative evaluation.

In addition, 46 financial targets were reviewed as part of the IE evaluation with 36 of those targets being present in the **2025 EC AIR** for Planned vs. Actual, variance, and variance explanation evaluation. Of the 36 financial targets that received the Planned vs. Actual, Variance, and Variance Explanation evaluation, 30 had funding discrepancies greater than 10% absolute variance.

¹ Document "2025.01.17_PC_2025_WMP_Revision_Clean_Rev6.pdf" referred to throughout as "**2025 WMP**"

² Document "2025.01.17_PC_2025_WMP_Update_Clean_Rev2.pdf" referred to throughout as "**2025 WMP Update**"

³ Document "PC_2025_Q4_R0.xlsx," referred to throughout as "2025 Q4 QDR."

⁴ Document "PC_2025_EOY_R1.xlsx" referred to throughout as "2025 EOY"

⁵ Document "TN17859_20260401T161023_PC_2025_WMP_Annual_Implementation_Report_20260401.pdf" referred to throughout as "2025 EC AIR"

Table 1-2 shows the funding targets, funding actuals, variance, and variance explanations for the 30 initiatives with funding discrepancies greater than 10% absolute variance.

Overall, the IE found that PacifiCorp is continuing to make progress on the recommendations that were provided in the **2024 WMP IE ARC**. PacifiCorp still has data quality issues, especially for Grid Hardening (GH) and Vegetation Management (VM) initiatives, but the IE has received communication to confirm that there are steps/programs in place to resolve these issues moving forward. Additionally, for 2025 PacifiCorp has reduced the number of initiatives that received “Initiative Not Validated” from six in 2024 to one in 2025. PacifiCorp also reduced the number of “Target Not Met” initiatives from 10 in 2024 to four in 2025.

Table 1-1 – Summary of Findings

Initiative ID	Initiative Name	Finding	Detail on Finding
AI-03	Transmission Detail Inspections	Initiative Not Validated	PacifiCorp set a target of 540 inspections and only completed 509 inspections. The following explanation was provided in the 2025 EC AIR: “The remaining locations were identified as retired facility points or misidentified assets that did not meet the criteria for transmission detail inspection.” The IE calculated an Initiative Validation Rate of 94% using the WMP Target of 540, the EC Claimed Progress of 509, and a Sample Validation Rate of 100%. An Initiative Validation Rate of 94% is less than the 95% required by OEIS for an initiative to be validated and as such the IE considers this initiative not validated.
AI-05	Transmission Intrusive Pole Inspections	Target Not Met	PacifiCorp set a target of 1,257 inspections and only completed 1,246 inspections. The following explanation was provided in the 2025 EC AIR: “The remaining 11 inspection locations were determined to be either retired facility points or incorrectly labeled in the system and did not meet the criteria for inspection as part of this initiative (e.g., one location was incorrectly noted as overhead when it was underground)”
AI-06	Distribution Intrusive Pole Inspections	Target Not Met	PacifiCorp set a target of 3,173 inspections and only completed 3,162 inspections. The following explanation was provided in the 2025 EC AIR: “The remaining 11 inspection locations were determined to be either retired facility points or incorrectly labeled in the system and did not meet the criteria for inspection as part of this initiative (e.g., one location was incorrectly noted as overhead when it was underground)”
AI-11	Substation Inspections	Target Not Met	PacifiCorp set a target of 451 inspections and only completed 450 inspections. The following explanation was provided in the 2025 EC AIR: “The inspection plan was adjusted due to Western Electricity Coordinating Council (WECC) path changes, resulting in one fewer required inspection.”
VM-05	Pole Clearing	Validation Inconclusive Target and Progress Misleading	As a result of the confusing reporting system, combined with an IE error in interpreting the VM-05 data when sampling, the IE cannot reach a conclusion on whether PacifiCorp completed the number of pole clearings it targeted in 2025. However, the IE can conclude that PacifiCorp did not conduct 3,126 pole clearings, since that target includes both poles inspected and those deemed exempt from clearing. Additionally, the IE did identify apparent errors in the exemption classifications of several poles reviewed in the field, which raise concerns about the effectiveness of the pole-clearing program in identifying the correct poles to clear.

Table 1-2 – Summary of Funding (Variance Greater Than 10%)

Initiative ID	Initiative	Planned Spend (\$ Thousands)	Actual Spend (\$ Thousands)	Variance	Variance Description
GH-01	Line Rebuild – Covered Conductor Installation	\$120,000	\$182,582	52%	PacifiCorp's 2025 expenditure for GH-01 (Line Rebuild – Covered Conductor Installation) exceeded the budget estimated in the 2025 WMP Update primarily because the cost per mile of installing covered conductor was higher than anticipated due to upgraded agreements with design and construction contractors. Some incremental contract changes included field engineering support, post-construction inspections, and extended warranty. Additionally, PacifiCorp completed additional design scoping in 2025 to have designs and permits in place for 2026 work.
GH-04	Installation of System Automation Equipment	\$2,500	\$7,158	186%	PacifiCorp's 2025 expenditure for GH-04 (Installation of System Automation Equipment) exceeded the budget estimated in the 2023–2025 Base WMP for several reasons. The estimated budget was based on the installation of 10 units; however, in accordance with Energy Safety guidance, PacifiCorp completed 23 units, including 13 units not completed in prior years. This resulted in an increase in the overall amount of work completed and associated costs for this initiative. Furthermore, the cost per unit was higher than anticipated due to the engagement of a construction project management company to oversee system hardening projects, as well as higher-than-expected costs associated with extending communications to field devices.
GH-05	Expulsion Fuse Replacement	\$1,000	\$1,455	46%	PacifiCorp's 2025 expenditure for GH-05 (Expulsion Fuse Replacement) exceeded the budget estimated in the 2025 WMP Update primarily because the budget was based on 500 fuse replacements, and 932 were completed. GH-05 includes both targeted fuse replacements and fuse replacements performed concurrently with line rebuild work under GH-01. In 2025, the company completed 181 targeted fuse replacements and an additional 751 replacements concurrently with line rebuild work. As outlined in PacifiCorp's 2025 WMP Update , the company prioritizes the replacement of expulsion fuses in coordination with line rebuild projects whenever practical. Performing fuse replacements during line rebuild activities is an intentional strategy to maximize operational efficiency and minimize overall system costs for customers.

Initiative ID	Initiative	Planned Spend (\$ Thousands)	Actual Spend (\$ Thousands)	Variance	Variance Description
AI-01	Transmission Patrol Inspections	\$87	\$55	-37%	PacifiCorp's 2025 actual expenditure for AI-01 (Transmission Patrol Inspections) was lower than the planned budget because the cost to complete the inspections in 2025 was less than originally forecast in the 2023–2025 Base WMP. When Transmission Detail Inspections (AI-03) were completed before the scheduled Transmission Patrol Inspections (AI-01) for the same assets, the Patrol Inspections (AI-01) were not performed, avoiding duplicative work and therefore lowering the overall spend on AI-01.
AI-02	Distribution Patrol Inspections	\$268	\$443	65%	PacifiCorp's 2025 actual expenditure for AI-02 (Distribution Patrol Inspections) exceeded the planned budget because the number of required patrol inspections in 2025 was significantly higher than assumed in the 2023–2025 Base WMP. Following a change in the safety assurance frequency to an annual inspection requirement, the total number of overhead distribution safety patrols increased by approximately 8,000 units compared to the original WMP target. This higher inspection volume resulted in actual expenditures above the planned level.
AI-03	Transmission Detail Inspections	\$20	\$48	140%	PacifiCorp's 2025 actual expenditure for AI-03 (Transmission Detail Inspections) exceeded the planned budget because the cost per detailed inspection was higher than assumed in the 2025 WMP Update . Although the number of structures requiring detailed inspection in 2025 was slightly lower than forecast, the unit cost to perform the inspections was greater than anticipated, resulting in total expenditures above the planned level.
AI-04	Distribution Detail Inspections	\$221	\$578	162%	PacifiCorp's 2025 actual expenditure for AI-04 (Distribution Detail Inspections) exceeded the planned budget because the number of required inspections in 2025 was significantly higher than assumed in the 2023–2025 Base WMP. Due to the Tier 2/3 pilot program transitioning from a five-year cycle to a two-year cycle for detail inspections, starting in 2025, the total number of inspections increased by approximately 8,000 above the planned target. This higher inspection volume resulted in actual expenditures above the planned level.

Initiative ID	Initiative	Planned Spend (\$ Thousands)	Actual Spend (\$ Thousands)	Variance	Variance Description
AI-05	Transmission Intrusive Pole Inspections	\$64	\$131	105%	PacifiCorp's 2025 actual expenditure for AI-05 (Transmission Intrusive Pole Inspections) exceeded the planned budget because more transmission poles required intrusive inspection in 2025 than assumed in the 2025 WMP Update . Intrusive inspection volumes vary annually based on the pole inspection cycle and the number of structures scheduled for testing in a given year. The higher inspection volume in 2025 resulted in actual expenditures above the planned level.
AI-06	Distribution Intrusive Pole Inspections	\$175	\$135	-23%	PacifiCorp's 2025 actual expenditure for AI-06 (Distribution Intrusive Pole Inspections) was lower than the planned budget because fewer distribution poles required intrusive inspection in 2025 than assumed in the 2025 WMP Update . Intrusive inspection volumes vary annually based on the inspection cycle and the number of poles scheduled for testing in a given year. The lower inspection volume resulted in actual expenditures below the planned level.
AI-08	Enhanced (Infrared) Inspections in Distribution Lines	\$0	\$218	N/A	PacifiCorp's 2025 actual expenditure for AI-08 (Enhanced (Infrared) Inspections in Distribution Lines) exceeded the planned budget because no funding was originally included for 2025 at the time the 2023–2025 Base WMP was filed. The pilot program for enhanced infrared inspections was scoped only for 2023 and 2024, and, as noted in Table 8-4 of the WMP, any 2025 activity was contingent on the results of the pilot. Following the 2024 inspection season, the pilot was approved to continue into 2025, including expansion into the HFTD. As a result, inspection work proceeded in 2025 even though no dollars had been budgeted for this initiative, leading to actual expenditures above the planned level.
AI-12	Quality Assurance and Quality Control	\$36	\$66	83%	PacifiCorp's 2025 actual expenditure for AI-12 (Quality Assurance and Quality Control) exceeded the planned budget because the total number of inspections subject to QA/QC review in 2025 was higher than anticipated in the 2023–2025 Base WMP. QA/QC activity levels are directly driven by the volume of transmission and distribution inspections completed each year, and increased inspection counts resulted in higher QA/QC workload and associated costs, leading to actual expenditures above the planned level.

Initiative ID	Initiative	Planned Spend (\$ Thousands)	Actual Spend (\$ Thousands)	Variance	Variance Description
GO-02	Grid Response Procedures and Notifications	\$600	\$152	-75%	PacifiCorp's 2025 expenditure for GO-02 (Grid Response Procedures and Notifications (Grid Ops): Patrols) was less than the planned 2025 budget due to a change to PacifiCorp's Wildfire Encroachment System Operations Procedure SOP-203, which resulted in fewer post outage patrols in 2025. This resulted in lower operations and maintenance and less expenditure than planned.
VM-01	Detailed Inspection – Distribution	\$310	\$731	136%	PacifiCorp's 2025 actual expenditure for VM-01 (Detailed Inspection – Distribution) exceeded the planned budget primarily due to an increase in required inspection volume following the establishment of the HFRA. As documented in the 2025 WMP Update , PacifiCorp implemented the FireSight risk model and identified 728 miles of new HFRA territory, which must be inspected to the same standards as CPUC Tier 2 and Tier 3 HFTD areas. This operational change resulted in higher inspection volumes than assumed in the 2023–2025 Base WMP. As a result, the actual 2025 expenditures exceeded the planned budget.
VM-02	Detailed Inspection – Transmission	\$87	\$112	29%	PacifiCorp's 2025 actual expenditure for VM-02 (Detailed Inspection – Transmission) exceeded the planned budget due to expanded inspection requirements resulting from the establishment of the HFRA. As documented in the 2025 WMP Update , PacifiCorp's implementation of the FireSight risk model identified new HFRA mileage that must be inspected to the same standards as CPUC Tier 2 and Tier 3 HFTD areas, increasing the total inspection scope beyond what was assumed in the 2023–2025 Base WMP.

Initiative ID	Initiative	Planned Spend (\$ Thousands)	Actual Spend (\$ Thousands)	Variance	Variance Description
VM-03	Patrol Inspection – Distribution	\$285	\$469	65%	PacifiCorp's 2025 actual expenditure for VM-03 (Patrol Inspection – Distribution) exceeded the planned budget due to an increase in required inspection mileage following the establishment of the HFRA. The implementation of the FireSight risk model identified new HFRA mileage that must be patrolled to the same standards as CPUC Tier 2 and Tier 3 HFTD areas, increasing required patrol coverage beyond the assumptions in the 2023–2025 Base WMP. Additionally, inspection mileage exceeded the forecast, increasing from 922 planned miles to 1,183 miles, driving higher unit costs, further contributing to the variance. As a result, actual 2025 expenditures were higher than planned.
VM-04	Patrol Inspection – Transmission	\$102	\$84	-18%	PacifiCorp's 2025 actual expenditure for VM-04 (Patrol Inspection – Transmission) was less than the planned budget due to changes in inspection mileage requirements following the establishment of the HFRA. As reflected in the 2025 WMP Update, the implementation of the FireSight risk model identified additional HFRA transmission mileage that must be patrolled annually using the same standards as CPUC Tier 2 and Tier 3 HFTD areas, expanding the scope of required work beyond the assumptions in the 2023–2025 Base WMP. In practice, inspection volume increased from an expected 329-line miles to 417-line miles, reflecting an increase in required coverage. While the cost per mile decreased due to efficiencies in execution, the total inspection requirement exceeded the originally planned volumes, contributing to the variance from budget assumptions.

Initiative ID	Initiative	Planned Spend (\$ Thousands)	Actual Spend (\$ Thousands)	Variance	Variance Description
VM-05	Pole Clearing	\$530	\$731	38%	PacifiCorp's 2025 actual expenditure for VM-05 (Pole Clearing) exceeded the planned budget due to increased clearing requirements following the establishment of the HFRA. As described in the 2025 WMP Update, the FireSight risk model identified substantial new HFRA acreage that must be managed to the same standards as CPUC Tier 2 and Tier 3 HFTD areas, expanding the total number of poles requiring clearing relative to the assumptions used in the 2023–2025 Base WMP. This expansion required pole clearing across a greater number of miles than originally forecast. Actual 2025 workload increased from an expected 3,014 miles to 3,192 miles, and the cost-pe-mile also increased, contributing to higher-than-planned expenditures.
VM-08	Fall-in Mitigation	\$40	\$0	-100%	PacifiCorp's 2025 actual expenditure for VM-08 (Fall-in Mitigation) was lower than planned because the underlying fieldwork associated with the Enhanced Overhang Reduction pilot was discontinued prior to the start of the 2025 implementation period. Although funding was carried forward into 2025 in case additional fieldwork verification was required, no field activities were needed and the remaining evaluation consisted only of desktop review and internal discussions. As a result, no fieldwork occurred and no expenditures were incurred under this initiative in 2025.
VM-11	Quality Assurance/ Quality Control	\$165	\$223	35%	PacifiCorp's 2025 actual expenditure for VM-11 (Quality Assurance/ Quality Control) exceeded the planned budget due to an increase in required QA/QC activities associated with expanded inspection scope in the HFRA. Following implementation of the FireSight risk model, the 2025 WMP Update established new HFRA territory that must be inspected and audited to the same standards as CPUC Tier 2 and Tier 3 HFTD areas, which increased the volume of vegetation inspections subject to QA/QC review. As a result, higher audit volumes and more extensive verification requirements led to increased costs beyond what was originally forecast for 2025.

Initiative ID	Initiative	Planned Spend (\$ Thousands)	Actual Spend (\$ Thousands)	Variance	Variance Description
SA-01	Environmental Monitoring Systems	\$120	\$141	18%	PacifiCorp's 2025 actual expenditure for SA-01 (Environmental Monitoring Systems) exceeded the planned budget because the company installed more environmental monitoring stations than originally projected in the 2023–2025 Base WMP. As reflected in the WMP, PacifiCorp adjusts annual installation quantities based on operational needs and situational awareness requirements, and in 2025, additional stations were installed to support wildfire risk monitoring beyond the initial forecast. These added installations resulted in higher costs than the planned budget assumed.
SA-02	Grid Monitoring Systems	\$0	\$34	N/A	PacifiCorp's 2025 actual expenditure for SA-02 (Grid Monitoring Systems) exceeded the planned budget because the initiative continued to incur communication costs associated with existing distribution fault anticipation (DFA) devices through 2025. Although support-service costs were no longer included in this initiative beginning in the 2023–2025 Base WMP, cellular communication charges remained necessary to operate the devices until their service contracts expired. These ongoing communication costs resulted in actual expenditures above the planned budget, which assumed no spending for 2025.
SA-05	Weather Forecasting	\$670	\$195	-71%	PacifiCorp's 2025 actual expenditure for SA-05 (Weather Forecasting) was lower than the planned budget due to unanticipated Department of Energy (DOE) grant reimbursements and changes in PacifiCorp's contract with Technosylva. DOE reimbursements applied to more activities than initially expected, reducing net expenditure for the initiative. In addition, Technosylva's updated contract structure resulted in certain forecasting and modeling costs being invoiced differently than reflected in the planning forecast, contributing to lower actual spending within SA-05.

Initiative ID	Initiative	Planned Spend (\$ Thousands)	Actual Spend (\$ Thousands)	Variance	Variance Description
SA-06	Fire Potential Index	\$96	\$996	938%	PacifiCorp's 2025 actual expenditure for SA-06 (Fire Potential Index) exceeded the planned budget due to changes in PacifiCorp's contract with Technosylva and because the weather modeling and forecasting enhancements completed in 2025 were greater in scope than assumed in the Base 2023–2025 WMP. The updated Technosylva contract structure resulted in higher costs than originally anticipated. In addition, PacifiCorp expanded its high-performance computing clusters from two to five units to support both an extension of the Weather Research and Forecasting (WRF) deterministic model from 3.5 to 5 days and implementation of the WRF ensemble system. Building the ensemble model required additional computing capacity to generate nine high-resolution forecasts, which improve the detection of low-probability, high-impact events such as PSPS conditions. These enhancements provide greater advanced situational awareness capabilities than anticipated based on the original 2025 planned spend.
EP-01	Emergency Preparedness Plan	\$320	\$472	48%	PacifiCorp's 2025 actual expenditure for EP-01 (Emergency Preparedness Plan) exceeded the planned budget due to the expansion of emergency-related work groups supporting wildfire and PSPS preparedness activities. In 2025, PacifiCorp increased staffing and resources across the Wildfire Intelligence Center, Meteorology, Emergency Management, and Emergency Response functions to meet operational and regulatory needs. These organizational changes increased the labor and program costs attributed to this initiative beyond what was assumed in the 2025 WMP Update .
EP-02	External Collaboration and Coordination	\$10	\$1.3	87%	PacifiCorp's 2025 actual expenditure for EP-02 (External Collaboration and Coordination) was lower than the planned budget because funding requirements for this initiative continued to decline in 2025. As coordination processes and stakeholder engagement activities became more streamlined, fewer resources were needed than assumed in the 2025 WMP Update , resulting in actual expenditures below the planned level.

Initiative ID	Initiative	Planned Spend (\$ Thousands)	Actual Spend (\$ Thousands)	Variance	Variance Description
RA-01	Risk and Risk Components Calculation	\$155	\$345	123%	PacifiCorp's 2025 expenditure for RA-01 (Risk and Risk Components Calculation) exceeded the planned budget because the Asset Risk Data Science team added four additional full-time employees to support increasingly complex risk-modeling requirements. This staffing expansion increased the operations and maintenance hours and associated costs allocated to this initiative, resulting in actual expenditures above the planned level.
RA-04	Enterprise System for Risk Assessment	\$73	\$701	860%	PacifiCorp's 2025 expenditure for RA-04 (Enterprise System for Risk Assessment) exceeded the planned budget because the original estimate assumed that software costs would be expensed over multiple years rather than capitalized. When the costs were instead capitalized in 2025, a larger portion of the total cost was recognized within the year, resulting in actual expenditures above the planned level.
PS-01	Protocols on PSPS	\$750	\$0	-100%	PacifiCorp's 2025 actual expenditure for PS-01 (Protocols on PSPS) was lower than the planned budget because no PSPS events occurred in 2025. In the absence of PSPS events, no related operational activities or associated costs were incurred, resulting in actual expenditures below the planned level.
WP-01	Wildfire Mitigation Strategy Development	\$845	\$980	16%	PacifiCorp's 2025 actual expenditure for WP-01 (Wildfire Mitigation Strategy Development) exceeded the planned budget due to organizational changes in wildfire mitigation planning. During 2025, PacifiCorp reorganized staff supporting wildfire mitigation strategy development and adjusted how planning-related costs were allocated across the company's service territories. These changes resulted in a greater share of wildfire mitigation planning costs attributed to this initiative than was assumed in the 2025 WMP Update used to establish the planned budget.
WP-02	Identifying and Evaluating Mitigation Initiatives	\$280	\$18	-94%	PacifiCorp's 2025 actual expenditure for WP-02 (Identifying and Evaluating Mitigation Initiatives) was lower than the planned budget because spending on the drone pilot program in 2025 was less than anticipated in the 2025 WMP Update . As a result, actual costs attributed to this initiative were below the planned level.

2. Introduction

The state of California has seen an increase in disastrous wildfires in recent years. Over the last decade, the California Department of Forestry and Fire Protection (CAL FIRE) reports that larger and more aggressive fires have occurred year-over-year due to prolonged drought conditions, a hotter climate, historic fire suppression, forest management, and bark beetle infestations. Several of the most damaging fires have been ignited by utility equipment and operations. This has spurred California to pass legislation and supporting regulations requiring electrical corporations (ECs) to develop and implement an annual wildfire mitigation plan (WMP), submit periodic filings on the implementation of initiatives under the WMP, and submit to a qualified independent evaluator (IE)⁶ to review and assess the EC's compliance with its WMP.⁷

Wildfire Mitigation Plan Independent Evaluation Engagement

This document serves as the IE Annual Report on Compliance ("Report") that aligns with the scope set forth by the California Office of Energy Infrastructure Safety ("Energy Safety"), a department under the California Natural Resources Agency, on April 11, 2025.⁸ All California ECs are required to contract with a qualified IE to perform the assessment and deliver a report before July 1, 2026. The IE was contracted to complete this assessment and began work on February 09, 2026.

This Report aims to verify WMP activities performed by PacifiCorp, hereinafter referred to as EC, as they compare to the initiative targets the EC planned to accomplish in 2025, to determine whether those activities were funded appropriately, and to describe the EC's quality assurance/quality control (QA/QC) programs and validate to a degree of reasonable assurance that these efforts were completed as described and reported.

The Report is the product of the IE's assessments of the EC's WMP, publicly available documentation submitted to Energy Safety, data request responses, field visits, and interviews with the EC's subject matter experts (SMEs).

To perform this assessment, the IE adopted the following approach:

- **Review publicly available information, including the WMP:** The IE reviewed publicly available information to prepare for the assessment, including PacifiCorp's WMP and other publicly released or submitted documents.
- **Prepare initial and subsequent data requests:** The first data request focused on programmatic level documentation about the utility's vegetation management program, asset inspection program, grid-hardening programs, etc. Additional information requested included any non-public WMP-related

⁶ NV5 and Guidehouse were designated as an eligible Qualified Independent Evaluator for WMPs on December 18, 2025, as part of the *Revised Independent Evaluator List for 2025 Wildfire Mitigation Plans*.

⁷ California Public Utilities Code (PUC) § 8386.3.

⁸ California Office of Energy Infrastructure Safety, *Request for Qualifications RFQ No.:24-033680*

submissions and supplemental geographic information system (GIS) spatial data. This provided the IE with a baseline understanding of available documentation beyond publicly available sources.

- **Document discovery review:** The IE reviewed supplemental information about WMP initiatives in the Quarterly Data Reports (QDRs) and Annual Implementation Report (AIR). The IE reviewed each data request response for completeness, responsiveness, and thoroughness. These materials are meant to address all three subject areas addressed in the report – implementation of initiatives, initiative funding, and QA/QC material.
- **Perform risk assessments for field inspections:** Using GIS data submitted by the EC, the IE identified areas across the utility’s service territory where there was a substantial overlap between WMP initiative activities and risk designations, including High Fire Threat Districts (HFTDs) defined by the California Public Utilities Commission (CPUC) and the wildland-urban interface. The IE used this analysis to select meaningful locations for possible site visits to verify initiative activities performed in 2025.
- **Conduct a field inspection survey:** The IE conducted a visual patrol assessment of identified circuits and electrical assets within the selected areas. Results were captured on site and integrated with the findings of the document discovery tasks.
- **Interpret documents and field inspection results:** Utilizing the WMP and other related compliance documents submitted to Energy Safety, the IE reviewed the field inspection site notes, data request responses, and other evidence of the performed WMP activities and prepared findings surrounding each scoped initiative activity. The IE also conducted interviews, as needed, with SME personnel to gain additional details and address questions on program and project targets and QA/QC performance.

3. Focus Initiatives and Discussion

List of Focus Initiatives Selected

Initiative ID	Initiative
AI-03	Transmission Detail Inspections
AI-04	Distribution Detail Inspections
AI-05	Transmission Intrusive Pole Inspections
AI-06	Distribution Intrusive Pole Inspections
GH-01	Line Rebuild - Covered conductor installation
GH-02	Distribution Pole Replacement
GH-03	Transmission Pole Replacement
GH-04	Installation of System Automation Equipment
GH-05	Expulsion Fuse Replacement
VM-05	Fuels management – Pole clearing beyond PRC 4292
VM-11	QA/QC - Post-Audits Distribution/Transmission (Patrol)

Methodology and Criteria for Determining Focus Initiatives

The IE selected the Focus Initiatives based on several criteria. First, the IE heavily weighted initiatives that were identified for field verification. This weighting was determined based on the IE's experience with field verification as well as the field verification guidance provided by Energy Safety. Energy Safety's guidance reduced the number of initiatives that would have previously been considered field verifiable, but increased sample size requirements leading to the evaluation/verification of a greater number of field verifiable activities. It is also important to note that these initiatives are also deemed significant by PacifiCorp as they are a focus of both the **2025 WMP** as well as the **2025 EC AIR**. Additionally, the IE selected the Focus Initiatives based on the IE's experience performing WMP evaluations for PacifiCorp and other ECs. The IE also considered the importance of these initiatives for the overall success of the WMP.

4. Site and Sample Selection and Discussion

Sampling was performed in accordance with the prescribed methodology by determining sample sizes based on population, stratifying samples by CPUC-defined HFTD areas where applicable and using random sampling when no HFTD stratification existed. Selected samples reflect the population and geographic distribution of initiative units, while avoiding clustered sampling and considering practical field conditions for field-verifiable activities. The IE also identified alternate samples equal to 30% of the primary sample to address any unusable or inaccessible selections, adding more if needed to meet the required sample size.

The IE identified sample areas with conditions illustrating high fire risk and ignition potential within the PacifiCorp service territory. The field inspection location boundaries were layered over the service territory of the utility, along with owned and operated assets, and other geological factors to determine the location of the evaluation. As the principal map, the IE layered the three tiers within the CPUC's HFTD map.

Field verification efforts were concentrated in HFTD Tier 2 and Tier 3 areas, with less than 10% of field verifications to be performed in non-HFTD areas. In addition, The IE made efforts to ensure that field verifications occurred in geographically dispersed areas within the EC's service territory while considering accessibility, observability, and density of assets.

The IE conducted field verification efforts within several specific regions. The selected areas were identified through both risk and practical considerations. The practical element focused on the accessibility of the locations for both physical, ground-based inspections in addition to the observability of the work completed. The final regions were selected in accordance with Energy Safety guidelines and focused on areas that (1) had significant levels of field verifiable activities completed, (2) provided the ability to perform the greatest number of verifications given the time frame allowed, and (3) had conditions that present high fire risk and ignition potential.

List of Field Verifiable initiatives

Initiative ID	Initiative
GH-01	Line Rebuild - Covered conductor installation
GH-02	Distribution Pole Replacement
GH-03	Transmission Pole Replacement
GH-04	Installation of System Automation Equipment
GH-05	Expulsion Fuse Replacement
VM-05	Fuels management – Pole clearing beyond PRC 4292

5. Review of Initiatives across WMP Categories: Implementation and Funding

5.1 Grid Design, Operations, and Maintenance

5.1.1 Summary Table

Initiative Number, WMP Section, and Name	WMP - Initiative Target	EC-Claimed Progress	EC-Claimed Initiative Status	Sample Size	Sample Validation Rate ⁹	Verification Method	IE Finding on Initiative [Initiative Validation Rate ¹⁰]	WMP - Planned Spend (Thousands \$)	EC-Claimed Actual Spend (Thousands \$) [Variance]	Satisfied Risk Reduction Goal - Finding ¹¹
GH-01 8.1.2.1 Line Rebuild - Covered Conductor Installation	120 Line Miles	123 Line Miles	Complete	65 Line Miles [45 Grid Hardening Asset IDs]	95.5%- Field 97% - Desktop	Field & Desktop	99%	\$120,000	\$182,582 [52%]	N/A
GH-02 8.1.2.3 Distribution Pole Replacement	2400 Poles	2544 Poles	Complete	72 Poles	93%- Field 99% - Desktop	Field & Desktop	102%	N/A	N/A	N/A
GH-03 8.1.2.4 Transmission Pole Replacement	240 Poles	250 Poles	Complete	57 Poles	100%- Field 100% - Desktop	Field & Desktop	104%	N/A	N/A	N/A
GH-04 8.1.2.8 Installation of System Automation Equipment	10 Devices	23 Devices	Complete	23 Devices	100%- Field 91% - Desktop	Field & Desktop	220%	\$2,500	\$7,158 [186%]	N/A
GH-05 8.1.2.12 Expulsion Fuse Replacement	500 Fuses	932 Fuses	Complete	88 Fuses	90%- Field 90% - Desktop	Field & Desktop	168%	\$1,000	\$1,455 [46%]	N/A

⁹ When both Field and Desktop Verifications are performed the average of the Sample Validation Rates is used to determine the IVR.

¹⁰ Initiative Validation Rate is equal to the Sample Validation Rate times the EC-Claimed Progress and then divided by the WMP-Initiative Target.

¹¹ PacifiCorp did not capture risk reduction goals in its **2025 WMP**. Thus, the IE could not validate if a goal was met and used N/A to show this in the table.

Initiative Number, WMP Section, and Name	WMP - Initiative Target	EC-Claimed Progress	EC-Claimed Initiative Status	Sample Size	Sample Validation Rate ⁹	Verification Method	IE Finding on Initiative [Initiative Validation Rate ¹⁰]	WMP - Planned Spend (Thousands \$)	EC-Claimed Actual Spend (Thousands \$) [Variance]	Satisfied Risk Reduction Goal - Finding ¹¹
GH-12 8.1.2.7 Microgrids	Feasibility Study	Complete	Target Met	Sampling Not Utilized	Sampling Not Utilized	Desktop	Initiative Validated	N/A	N/A	N/A
AI-01 8.1.3.1 Transmission Patrol Inspections	12030 Inspections	12032 Inspections	Complete	23 Inspections	100%	Desktop	100%	\$87	\$55 [-37%]	N/A
AI-02 8.1.3.1 Distribution Patrol Inspections	50485 Inspections	58741 Inspections	Complete	23 Inspections	100%	Desktop	116%	\$268	\$443 [65%]	N/A
AI-03 8.1.3.2 Transmission Detail Inspections	540 Inspections	509 Inspections	Complete	80 Inspections	100%	Desktop	94%	\$20	\$48 [140%]	N/A
AI-04 8.1.3.2 Distribution Detail Inspections	10135 Inspections	18556 Inspections	Complete	91 Inspections	100%	Desktop	183%	\$221	\$578 [162%]	N/A
AI-05 8.1.3.3 Transmission Intrusive Pole Inspections	1257 Inspections	1246 Inspections	Complete	86 Inspections	100%	Desktop	99%	\$64	\$131 [105%]	N/A
AI-06 8.1.3.3 Distribution Intrusive Pole Inspections	3173 Inspections	3162 Inspections	Complete	89 Inspections	100%	Desktop	99.7%	\$175	\$135 [-23%]	N/A
AI-07 8.1.3.6 Enhanced (Infrared) Inspections in Transmission Lines	700 Line Miles	Q4 QDR – 1567 Line Miles ¹² AIR – 692 Line Miles ¹³	Complete	23 Line Miles	100%	Desktop	224%	\$90	\$87 [-3%]	N/A

¹² AI-07 Q4 QDR reporting of 1567 was used for sampling and desktop validation

¹³ Due to the **2025 EC AIR** being published after completion of the IE review, the IE used the **2025 Q4 QDR** value of 1,567 line-miles for its evaluation.

Initiative Number, WMP Section, and Name	WMP - Initiative Target	EC-Claimed Progress	EC-Claimed Initiative Status	Sample Size	Sample Validation Rate ⁹	Verification Method	IE Finding on Initiative [Initiative Validation Rate ¹⁰]	WMP - Planned Spend (Thousands \$)	EC-Claimed Actual Spend (Thousands \$) [Variance]	Satisfied Risk Reduction Goal - Finding ¹¹
AI-08 8.1.3.5 Enhanced (Infrared) Inspections in Distribution Lines	N/A ¹⁴	1300 Line Miles	Complete	23 Line Miles	100%	Desktop	Initiative Validated [N/A] ¹⁵	\$0	\$218 [N/A]	N/A
AI-11 8.1.3.4 Substation Inspections	451 Inspections	450 Inspections	Complete	23 Inspections	100%	Desktop	99.8%	\$180	\$175 [-3%]	N/A
AI-12 8.1.6 Quality Assurance and Quality Control	756 Inspections	Q4 QDR – 1567 Inspections ¹⁶ AIR – 1887 Inspections ¹⁷	Complete	23 Inspections	100%	Desktop	207%	\$36	\$66 [83%]	N/A
GO-01 8.1.8.1 Equipment Settings to Reduce Wildfire Risk (Grid Ops): EFR and Fault Indicators	No Target	Not Reported	Not Reported	Sampling Not Utilized	Sampling Not Utilized	Desktop	Detailed Initiative Review Not Performed	N/A	N/A ¹⁸ [N/A]	N/A
GO-02 8.1.8.3 Grid Response Procedures and Notifications (Grid Ops): Patrols	No Target	Not Reported	Not Reported	Sampling Not Utilized	Sampling Not Utilized	Desktop	Detailed Initiative Review Not Performed	\$600	\$152 [-75%]	N/A

¹⁴ For AI-08 an Initiative Target was not provided in the WMP, WMP Update, or QDR

¹⁵ An IVR cannot be calculated due to PacifiCorp not providing a target for AI-08

¹⁶ AI-12 Q4 QDR reporting of 1567 was used for sampling and desktop validation

¹⁷ Due to the **2025 EC AIR** being published after completion of the IE review, the IE used the **2025 Q4 QDR** value of 1,567 line-miles for its evaluation.

¹⁸ See Section 0 for details on finding for GO-01

Initiative Number, WMP Section, and Name	WMP - Initiative Target	EC-Claimed Progress	EC-Claimed Initiative Status	Sample Size	Sample Validation Rate ⁹	Verification Method	IE Finding on Initiative [Initiative Validation Rate ¹⁰]	WMP - Planned Spend (Thousands \$)	EC-Claimed Actual Spend (Thousands \$) [Variance]	Satisfied Risk Reduction Goal - Finding ¹¹
MA-01 8.1.4 Equipment Maintenance and Repair	Continue planned transmission and distribution wires maintenance	Complete	Target Met	N/A	N/A	Desktop	Initiative Validated	\$410	\$399 [-3%]	N/A
	Continue planned substation apparatus maintenance programs									

5.1.2 Line Rebuild – Covered Conductor Installation (GH-01)

5.1.2.1 Initiative Review

Section 8.1.2.1 of PacifiCorp’s **2025 WMP** describes PacifiCorp’s line rebuild program. PacifiCorp explains that while overhead distribution equipment and lines are designed to meet current compliance requirements, under certain conditions, such as high wind speeds, these lines can become more vulnerable to “contact by object” risk drivers. PacifiCorp is addressing this risk through the line rebuild program. PacifiCorp’s line rebuild program includes deployment of the following main techniques:

- *Reconductor with covered conductor*: Specialized overhead covered conductors can be constructed with additional shielding and enhanced insulating properties to aid in wildfire mitigation.
- *Undergrounding*¹⁹: Under the line rebuild program, PacifiCorp is also considering undergrounding. While an underground design does not eliminate every source of ignition potential (i.e., because of aboveground junctions), it is considered the most effective strategy for reducing the risk of utility-related ignition. Unfortunately, the cost of underground construction often makes it difficult to apply on a widespread basis. Therefore, PacifiCorp evaluates the potential to convert overhead lines to underground lines for rebuild projects on a project-by-project basis. Through the design process, each individual project is assessed to determine whether sections of the rebuild should be completed with underground construction. For example, a more remote, heavily forested location with few customer connections could be an ideal candidate for undergrounding.
- *Line Removal*: Overhead lines may become idle facilities due to changes in customer need or construction of alternate feeds. When an overhead line is determined no longer to be needed, the line will be removed, fully removing the ignition risks associated with the line.

The **2025 WMP** identified an annual line rebuild target of 80 line-miles, that value was later updated to 120 line-miles. The line rebuild forecast increased with the on-boarding of a contractor to handle the construction resources and installation of covered conductor and the ability of the contractor to deliver on the installation of more covered conductor. The **2025 Q4 QDR** indicated that 123 line-miles were completed in 2025.

To validate the 123 line-miles of covered conductor that were installed, the IE requested in *DR 3* a list of the full population of line-miles reported in 2025. In response, PacifiCorp provided evidence document **Q1-4 2025 line rebuild 1.xlsx**, which listed a record of 70 unique grid-hardening IDs accounting for the 123 line-miles of covered conductor. From this list, coupled with GIS data provided by PacifiCorp, the IE selected a random sample of 45 grid-hardening IDs (accounting for more than 87 line-miles of

¹⁹ In the 2025 WMP Cycle no lines were converted from overhead to underground

covered conductor installation) on which to perform a field verification, using location data and risk assessment to select lines that could reasonably be reached for field inspection. For the field verifications, the IE physically verified that the covered conductor installations were completed by visiting the site and noting the upgraded materials. As result of the field verification, 43 instances of covered conductor installation were verified and determined to be compliant in the field. Two instances of covered conductor installation could not be verified.

To further validate the work completed, the IE requested detailed documentation demonstrating completion for the sample set of 45 grid hardening IDs accounting for more than 87 line-miles of covered conductor installation in *DR 8*. PacifiCorp provided **GH-01 (line rebuild -covered conductor installation)**, which contained folders for each work order accounting for the line-miles completed. The IE reviewed the work orders, pull section tracker spreadsheets, and pull section checklists and verified the successful installation of 44 out of 45 of the instances of the covered conductor.

Finding

The initiative has an IE Finding of “Initiative Validated” with an IVR of 99%.

Based on the desktop verification validation rate of 97% and a field verification validation rate of 95.5%, for a combined sample validation rate of 96%, the IE has reasonable assurance that PacifiCorp completed 123 line-miles of covered conductor installation in 2025.

5.1.2.2 Funding Verification

PacifiCorp’s 2025 Annual Implementation Report (AIR) provided a projected budget of \$120,000 (\$ thousand) and an actual budget of \$182,582 (\$ thousand) for an absolute percent difference of 52%. PacifiCorp’s variance explanation was as follows:

“PacifiCorp’s 2025 expenditure for GH-01 (Line Rebuild – Covered Conductor Installation) exceeded the budget estimated in the **2025 WMP Update** primarily because the cost per mile of installing covered conductor was higher than anticipated due to upgraded agreements with design and construction contractors. Some incremental contract changes included field engineering support, post-construction inspections, and extended warranty. Additionally, PacifiCorp completed additional design scoping in 2025 to have designs and permits in place for 2026 work.”

Additionally, PacifiCorp’s 2025 End of Year Workbook (**2025 EOY**) provided a territory CAPEX and HFTD CAPEX actual value expenditure for GH-01 of \$182,268 (\$ thousand) and \$143,992 (\$ thousand) respectively. The EOY also provided a territory OPEX and HFTD OPEX actual value expenditure for GH-01 of \$314 (\$ thousand) and \$263 (\$ thousand) respectively.

5.1.3 Distribution Pole Replacement (GH-02)

5.1.3.1 Initiative Review

Section 8.1.2.3 of PacifiCorp's **2025 WMP** describes PacifiCorp's distribution pole replacement program. PacifiCorp explains that it included the pole replacement program within the line rebuild program as an efficient use of resources. Only poles replaced under the line rebuild program are counted in the WMP. In some cases, poles need to be replaced to accommodate the additional weight of covered conductor, while replacing wooden poles with stronger nonwooden solutions such as fiberglass or steel also increases grid resiliency and eliminates the need to return later. This approach also ensures that pole replacements are prioritized effectively.

The **2025 WMP** identified an annual target of 2,400 distribution pole replacements and the **2025 Q4 QDR** indicated that 2,544 pole replacements were conducted in 2025, surpassing the target by 144 pole replacements. To validate the 2,544 distribution poles that were replaced, the IE requested in *DR 3* a list of the full population of poles reported as replaced in 2025. In response, PacifiCorp provided evidence document Item 12 **dist poles.xlsx**, which listed a record of 2,544 distribution pole replacements with unique identifiers. From this list, the IE selected a random sample of 89 poles (71 with a margin of error of 18) on which to perform field verification, using location data and risk assessment to select poles that could reasonably be reached for field inspection.

Upon initiation of the field verification process in conjunction with the desktop review, The IE found 19 duplicate Asset IDs in the sampled pole response data, bringing the sample size down to 70. Due to the timeliness of the discover and upcoming report delivery, two Asset IDs were added to the field verification list in areas that had been previously approved via the field verification review process. The sample size for review and validation was modified to 72 poles for sample and initiative validation rates.

For the field verifications, the IE physically verified that the distribution pole replacements were completed by visiting the site and noting the upgraded materials. As a result of the field verification, 67 poles were verified and determined to be compliant in the field. The field technician was not able to verify two poles due to a locked gate. Field verification compliance was determined through both PRC 4293 standards and WMP descriptions of minimum standards.

For desktop verification, the IE requested detailed documentation demonstrating completion for the sample set of 89 distribution pole replacements in *DR 8*. PacifiCorp provided several evidence documents, including a map for each project, documentation matching work sequences to the segment of new conductor, and the pull section checklist/work completion forms to verify the work performed. As stated above the target for review was adjusted to 72 following *DR 8*. The IE reviewed the project-level documentation for the eight work orders associated with the 72 sampled poles and was able to validate 71 pole replacements based on the work order documentation and associated pull section checklist/work completion forms. One pole replacement could

not be validated. As a result, the IE requested further documentation or an explanation why this pole was not replaced in *DR 9*. PacifiCorp provided Report for system hardening unit not found in supporting documentation **pole 222200.docx**, explaining that a detailed review of contractor supporting documentation and field investigation and determined that this pole was included in Pole Loading System Computer Added Design (PLS-CAD) modeling as a point to model the bare wire on an adjacent circuit to the project for the associated work order, thus the pole replacement was not required or included in the completed scope of work. The point was incorrectly included in the Q4 2025 QDR as a distribution pole replacement, and a re-submission of the Q4 2025 QDR that does not include the asset as a completed distribution pole replacement will be completed and the quarterly and cumulative completions will be adjusted accordingly.

Finding

The initiative has an IE Finding of “Initiative Validated” with an IVR of 102%.

Based on the adjusted sample size of 72 poles, the IE was able to verify 71 pole replacements through desktop verification and 67 poles through field verification, for a 99% desktop and 93% field validation rate. The IE has reasonable assurance that PacifiCorp completed its **2025 WMP** target of 2,400 distribution pole replacements in 2025 by completing 2,544 replacements.

5.1.3.2 Funding Verification

There was no expenditure associated with this initiative in the **2025 EC AIR** or the **2025 EOY**. The IE did not perform funding verification for this initiative.

5.1.4 Transmission Pole Replacement (GH-03)

5.1.4.1 Initiative Review

Section 8.1.2.4 of PacifiCorp’s **2025 WMP** describes PacifiCorp’s transmission pole replacement program. PacifiCorp explains that it included the pole replacement program within the line rebuild program as an efficient use of resources. Only poles replaced under the line rebuild program are counted in the WMP. In some cases, poles need to be replaced to accommodate the additional weight of covered conductor, while replacing wooden poles with stronger nonwooden solutions such as fiberglass or steel also increases grid resiliency and eliminates the need to return later. This approach also ensures that pole replacements are prioritized effectively.

The **2025 WMP** identified an annual target of 240 transmission pole replacements and the **2025 Q4 QDR** indicated that 250 pole replacements were conducted in 2025, surpassing the target by 10 pole replacements.

To validate the 250 transmission poles that were replaced, the IE requested in *DR 3* a list of the full population of poles reported as replaced in 2025. In response, PacifiCorp provided evidence document **transmission poles.xlsx**, which listed a record of 250

transmission pole replacements with unique identifiers. From this list, the IE selected a random sample of 57 poles on which to perform a field verification, using location data and risk assessment to select poles that could reasonably be reached for field inspection. For the field verifications, the IE physically verified that the transmission pole replacements were completed by visiting the site and noting the upgraded materials. As a result of the field verification, 57 poles were verified and determined to be compliant in the field. Compliant/Not Compliant was determined through both PRC 4293 standards and WMP descriptions of minimum standards.

To further validate the work completed, the IE requested detailed documentation demonstrating completion for the sample set of 57 transmission pole replacements in *DR 8*. PacifiCorp provided several evidence documents, including a map for each project, the work sequences to the segment of new conductor, and the pull section checklist/work completion forms to verify the work performed. The IE reviewed the project-level documentation for the nine work orders associated with the 57 sampled poles and was able to validate the pole replacements based on the work order documentation and associated pull section checklist/work completion forms.

Finding

The initiative has an IE Finding of “Initiative Validated” with an IVR of 104%.

Based on a desktop validation rate of 100% and a field verification validation rate of 100% for the 57 poles sampled, the IE has reasonable assurance that PacifiCorp completed its **2025 WMP** target of 240 transmission pole replacements in 2025 by completing 250 replacements.

5.1.4.2 Funding Verification

There was no expenditure associated with this initiative in the **2025 EC AIR** or the **2025 EOY**. The IE did not perform funding verification for this initiative.

5.1.5 Installation of System Automation Equipment (GH-04)

5.1.5.1 Initiative Review

According to Section 8.1.2.8 of PacifiCorp’s **2025 WMP**, the overall objective of this initiative is to deploy distribution and transmission protection and control schemes and equipment, such as relays, circuit breakers, reclosers, and communications equipment, to enhance fault detection capabilities, reduce fault isolation time, improve fault location and record availability, and speed restoration efforts.

The **2025 WMP** identified an annual target of 10 system automation devices, and the **2025 Q4 QDR** indicated that 23 devices were installed in 2025, exceeding the target by 13 devices.

To validate the 23 installations of system automation devices, the IE requested in *DR 3* a list of the full population of devices reported as installed in 2025. In response, PacifiCorp provided evidence document **system automation.xlsx**, which listed a record of 23 system automation devices with unique identifiers. The IE performed a field verification on the entire population, physically verifying that the device installations were completed by visiting the site and noting that the devices were present. As result of the field verification, all 23 devices were verified and determined to be compliant in the field.

To further validate the 23 devices reported as installed, the IE requested supporting documentation, such as work orders or equivalent records, in *DR 8*. In response, PacifiCorp provided evidence document **DR 8_Field Verification Desktop Review_PAC_20260410.xlsx**, which contained a list of the 23 devices, together with work orders showing the unique identifier and installation date for each device.

After the IE's initial review and subsequent discussions with PacifiCorp, it was determined that evidence for GH-05 had been mistakenly submitted for GH-04. PacifiCorp provided an explanation for the misclassification in **GH-04_Attestation.pdf** and submitted the correct GH-04 evidence in *DR 10*. The IE then requested additional field verification evidence in *DR 11*. Based on the supplemental evidence provided, the IE was able to verify, with reasonable assurance, 21 of the 23 devices reported as installed, meeting the 2025 target of 10 installations.

Finding

The initiative has an IE Finding of "Initiative Validated" with an IVR of 220%.

Based on the desktop and field review of the evidence provided, the IE has reasonable assurance that PacifiCorp met its **2025 WMP** target of 13 for installation of system automation equipment, by completing installation of 23 system automation equipment(s) in 2025.

5.1.5.2 Funding Verification

PacifiCorp's **2025 EC AIR** provided a projected budget of \$2,500 (\$ thousand) and an actual budget of \$7,158 (\$ thousand) for an absolute percent difference of 186%. PacifiCorp's variance explanation was as follows:

"PacifiCorp's 2025 expenditure for GH-04 (Installation of System Automation Equipment) exceeded the budget estimated in the 2023–2025 Base WMP for several reasons. The estimated budget was based on the installation of 10 units; however, in accordance with Energy Safety guidance, PacifiCorp completed 23 units, including 13 units not completed in prior years. This resulted in an increase in the overall amount of work completed and associated costs for this initiative. Furthermore, the cost per unit was higher than anticipated due to the engagement of a construction project management company to oversee system hardening projects, as well as higher-than-expected costs associated with extending communications to field devices."

Additionally, PacifiCorp's **2025 EOY** provided a territory CAPEX and HFTD CAPEX actual value expenditure for GH-04 of \$7,158 (\$ thousand) and \$5,512 (\$ thousand) respectively.

5.1.6 Expulsion Fuse Replacement (GH-05)

5.1.6.1 Initiative Review

Section 8.1.2.12 of PacifiCorp's **2025 WMP** describes PacifiCorp's expulsion fuse replacement program as a project to install new and CAL FIRE-approved non-expulsion fuses, including power fuses and current limiting fuses, to replace existing expulsion fuse equipment. PacifiCorp is proactively replacing expulsion fuses throughout the HFTD and, where practical, is completing replacement of expulsion fuses concurrent with line rebuild to utilize resources most efficiently.

The **2025 WMP** identified an annual target of 500 expulsion fuse replacements and the **2025 Q4 QDR** indicated that 932 replacements were conducted in 2025, surpassing the target by 432 replacements.

To validate the 932 expulsion fuses that were replaced, the IE requested in *DR 3* a list of the full population of poles reported as replaced in 2025. In response, PacifiCorp provided evidence document **fuses.xlsx**, which listed a record of 926 replacements, which did include duplicate identifiers.

From this list, the IE selected a random sample of 88 fuses (85 unique asset ID's with duplicate IDs removed from selection) on which to perform a field verification, using location data and risk assessment to select fuses that could reasonably be reached for field inspection. For the field verifications, the IE physically verified that the expulsion fuse replacements were completed by visiting the site and noting the upgraded devices. As a result of the field verification, 80 fuses were verified and determined to be compliant in the field, 1 fuse was unable to be determined because the pole number did not match the ID for the location, and 2 fuses were determined to be non-compliant as there was no expulsion fuse located on the asset.

To further validate the work completed, the IE requested detailed documentation demonstrating completion for the sample set of 88 fuse replacements in *DR 8*. PacifiCorp provided Gh-05 (expulsion fuse replacement) containing several evidence documents, including expenditure requisitions, construction drawings, inspection reports, and the pull section checklist/work completion forms to verify the work performed. The IE reviewed the project-level documentation for the 88 (85 unique asset ID's) sampled poles. As a result of the desktop verification, 80 fuses were verified and determined to be compliant in the field. Five fuses were determined to be non-compliant as they were not included in the work order documentation provided.

Finding

The initiative has an IE Finding of "Initiative Validated" with an IVR of 168%.

With a desktop verification validation rate of 90% and a field verification validation rate of 90% for the 88 poles sampled, the IE has reasonable assurance that PacifiCorp completed its **2025 WMP** target of 500 transmission pole replacements in 2025 by completing 932 replacements.

5.1.6.2 Funding Verification

PacifiCorp's **2025 EC AIR** provided a projected budget of \$1,000 (\$ thousand) and an actual budget of \$1,455 (\$ thousand) for an absolute percent difference of 46%. PacifiCorp's variance explanation was as follows:

"PacifiCorp's 2025 expenditure for GH-05 (Expulsion Fuse Replacement) exceeded the budget estimated in the **2025 WMP Update** primarily because the budget was based on 500 fuse replacements, and 932 were completed. GH-05 includes both targeted fuse replacements and fuse replacements performed concurrently with line rebuild work under GH-01. In 2025, the company completed 181 targeted fuse replacements and an additional 751 replacements concurrently with line rebuild work. As outlined in PacifiCorp's **2025 WMP Update**, the company prioritizes the replacement of expulsion fuses in coordination with line rebuild projects whenever practical. Performing fuse replacements during line rebuild activities is an intentional strategy to maximize operational efficiency and minimize overall system costs for customers."

Additionally, PacifiCorp's **2025 EOY** provided a territory CAPEX and HFTD CAPEX actual value expenditure for GH-05 of \$1,455 (\$ thousand) and \$1,120 (\$ thousand) respectively.

5.1.7 Microgrids (GH-12)

5.1.7.1 Initiative Review

Section 8.1.2.7 of PacifiCorp's **2025 WMP** states that PacifiCorp will perform feasibility studies to see if a microgrid project could be completed.

The **2025 WMP** identified a 2025 target of a Feasibility Study. The **2025 Q4 QDR** indicated that a Feasibility Study was performed in 2025.

To confirm that the Feasibility Study was completed, the IE requested in *DR 5* evidence of completion. In response to *DR 5* PacifiCorp provided **Confidentiality Decl to OEIS re Boxpower Studies Revised_SignedRDA.pdf**, which was provided to OEIS under a confidentiality declaration via OEIS DR-06 in August 2025.

The IE reviewed the declaration and determined that PacifiCorp had completed its Feasibility Study in 2025.

Finding

The initiative has an IE Finding of “Initiative Validated”.²⁰

Based on the desktop review of the evidence provided, the IE has reasonable assurance that PacifiCorp complete Feasibility Study in 2025, meeting the target set in the **2025 WMP**.

5.1.7.2 Funding Verification

There was no expenditure associated with this initiative in the **2025 EC AIR** or the **2025 EOY**. The IE did not perform funding verification for this initiative.

5.1.8 Transmission Patrol Inspections (AI-01)

5.1.8.1 Initiative Review

Section 8.1.3.1 of PacifiCorp’s **2025 WMP** states that transmission patrol inspections are performed to maintain regulatory compliance with California GO 95 and 165 regulations. PacifiCorp states that the inspections involve performing a brief visual inspection by viewing each facility from a vantage point allowing reasonable viewing access. These inspections are intended to identify damage or defects to the transmission and distribution system, or other potential hazards or right-of-way-encroachments that may endanger the public or adversely affect the integrity of the electric system, including items that could potentially cause a spark.

The **2025 WMP** identified an annual target of 12,030 transmission patrol inspections and the **2025 Q4 QDR** indicated that 12,032 transmission patrol inspections were conducted in 2025, surpassing the target by two inspections.

To confirm that the 12,032 transmission patrol inspections were conducted, the IE requested a full population list of these inspections with unique identifiers in *DR 3*. In response, PacifiCorp provided evidence document **CA 2025 Inspections Performed.xlsx**, which contained unique identifiers for each of the 12,032 distribution patrol inspections.

The IE then requested evidence for a random sample of 23 distribution patrol inspections (18 with a margin of error of 5) in *DR 4* to verify that the inspections were conducted. PacifiCorp provided a PDF report generated by its Facility Point Inspection database for each of the 23 inspections sampled. PacifiCorp also provided a document to assist the IE in interpreting the PDFs (**UNDERSTANDING_THE_FP22_INSPECTION_SCREEN.PDF**).

The IE reviewed each of the 23 PDFs to verify that for each distribution facility point, a patrol inspection (categorized as “SAFETY”) was performed in 2025.

²⁰ An IVR cannot be calculated for qualitative initiatives. The Initiative Finding is based on the IE having reasonable assurance that PacifiCorp completed its qualitative target.

Finding

The initiative has an IE Finding of “Initiative Validated” with an IVR of 100%.

Based on the desktop review of the evidence provided, the IE has reasonable assurance that PacifiCorp conducted the 12,032 transmission patrol inspections reported, exceeding the target set in its **2025 WMP**.

5.1.8.2 Funding Verification

PacifiCorp’s **2025 EC AIR** provided a projected budget of \$87 (\$ thousand) and an actual budget of \$55 (\$ thousand) for an absolute percent difference of 37%. PacifiCorp’s variance explanation was as follows:

“PacifiCorp’s 2025 actual expenditure for AI-01 (Transmission Patrol Inspections) was lower than the planned budget because the cost to complete the inspections in 2025 was less than originally forecast in the 2023–2025 Base WMP. When Transmission Detail Inspections (AI-03) were completed before the scheduled Transmission Patrol Inspections (AI-01) for the same assets, the Patrol Inspections (AI-01) were not performed, avoiding duplicative work and therefore lowering the overall spend on AI-01.”

Additionally, PacifiCorp’s **2025 EOY** provided a territory OPEX and HFTD OPEX actual value expenditure for AI-01, AI-02, AI-03, AI-04, AI-05, AI-06, AI-07, AI-08, and AI-11 of \$1870 (\$ thousand) and \$1100 (\$ thousand) respectively.

5.1.9 Distribution Patrol Inspections (AI-02)

5.1.9.1 Initiative Review

Section 8.1.3.1 of PacifiCorp’s **2025 WMP** states that distribution patrol inspections are performed to maintain regulatory compliance with California GO 95 and 165 regulations. PacifiCorp states that the inspections involve performing a brief visual inspection by viewing each facility from a vantage point allowing reasonable viewing access. These inspections are intended to identify damage or defects to the transmission and distribution system, or other potential hazards or right-of-way-encroachments that may endanger the public or adversely affect the integrity of the electric system, including items that could potentially cause a spark.

The **2025 WMP** identified an annual target of 50,485 distribution patrol inspections and the **2025 Q4 QDR** indicated that 58,741 distribution patrol inspections were conducted in 2025, surpassing the target by 8,256 inspections.

To confirm that the 58,741 distribution patrol inspections were conducted, the IE requested a full population list of these inspections with unique identifiers in *DR 3*. In response, PacifiCorp provided evidence document **CA 2025 Inspections**

Performed.xlsx, which contained unique identifiers for each of the 58,741 distribution patrol inspections.

The IE then requested evidence for a random sample of 23 distribution patrol inspections (18 with a margin of error of 5) in *DR 4* to verify that the inspections were conducted. PacifiCorp provided a PDF report generated by its Facility Point Inspection database for each of the 23 inspections sampled. PacifiCorp also provided a document to assist the IE in interpreting the PDFs (**UNDERSTANDING_THE_FP22_INSPECTION_SCREEN.PDF**).

The IE reviewed each of the 23 PDFs to verify that for each distribution facility point, a distribution patrol inspection (categorized as “SAFETY”) was performed in 2025.

Finding

The initiative has an IE Finding of “Initiative Validated” with an IVR of 116%.

Based on the desktop review of the evidence provided, the IE has reasonable assurance that PacifiCorp conducted the 58,741 distribution patrol inspections reported, exceeding the target set in its **2025 WMP**.

5.1.9.2 Funding Verification

PacifiCorp’s **2025 EC AIR** provided a projected budget of \$268 (\$ thousand) and an actual budget of \$443 (\$ thousand) for an absolute percent difference of 65%. PacifiCorp’s variance explanation was as follows:

“PacifiCorp’s 2025 actual expenditure for AI-02 (Distribution Patrol Inspections) exceeded the planned budget because the number of required patrol inspections in 2025 was significantly higher than assumed in the 2023–2025 Base WMP. Following a change in the safety assurance frequency to an annual inspection requirement, the total number of overhead distribution safety patrols increased by approximately 8,000 units compared to the original WMP target. This higher inspection volume resulted in actual expenditures above the planned level.”

Additionally, PacifiCorp’s **2025 EOY** provided a territory OPEX and HFTD OPEX actual value expenditure for AI-01, AI-02, AI-03, AI-04, AI-05, AI-06, AI-07, AI-08, and AI-11 of \$1870 (\$ thousand) and \$1100 (\$ thousand) respectively.

5.1.10 Transmission Detail Inspections (AI-03)

5.1.10.1 Initiative Review

Section 8.1.3.2 of PacifiCorp’s **2025 WMP** describes the transmission detail inspections program as being consistent with California GO 95 and 165 regulations. PacifiCorp states that the inspections involve a careful visual inspection accomplished by visiting each structure, as well as inspecting adjacent spans between structures, which is

intended to identify potential nonconformance with GO or other applicable state requirements, infringement by other utilities or individuals, defects, potential safety hazards, and deterioration of the facilities that need to be corrected to maintain reliable and safe service.

The **2025 WMP** identified an annual target of 540 transmission detail inspections and the **2025 Q4 QDR** indicated that 509 transmission detail inspections were conducted in 2025. The QDR addresses the difference in inspections conducted, stating that "the difference (31) between year-end actuals and annual target are due to the retirement of facility points which were part of the target". While PacifiCorp did not meet the **2025 WMP** identified annual target, they provided substantial justification to address the difference.

To verify that the 509 transmission detail inspections were conducted, the IE requested a full population list of the inspections with unique identifiers in *DR 3*. In response, PacifiCorp provided evidence document **CA 2025 Inspections Performed.xlsx**, which contained 509 unique asset IDs for the inspections performed.

The IE then requested evidence for a sample size of 80 transmission detail inspections (64 with a margin of error of 16) in *DR 4* to further verify that the inspections were conducted. PacifiCorp provided a PDF report generated by its Facility Point Inspection database for each of the 80 transmission detail inspections sampled. Through review of the evidence provided in responses to *DR 4*, the IE was able to verify the completion of all 80 sampled transmission detail inspections.

Finding

The initiative has an IE Finding of "Initiative Not Validated" with an IVR of 94%.

Based on the desktop review of the evidence provided, the IE has reasonable assurance that PacifiCorp performed 509 transmission detail inspections. However, the IE notes that this is 31 inspections short of the **2025 WMP** target of 540 inspections, which was reported as complete in the **2025 Q4 QDR**. While the IE was able to confirm the reasoning for the 31 inspections, the initiative validation still needs to be performed using the target of 540 inspections. Because of this, the IE was not able to validate the initiative, even though there is reasonable assurance that PacifiCorp completed the 509 transmission detail inspections.

5.1.10.2 Funding Verification

PacifiCorp's **2025 EC AIR** provided a projected budget of \$20 (\$ thousand) and an actual budget of \$48 (\$ thousand) for an absolute percent difference of 138%. PacifiCorp's variance explanation was as follows:

"PacifiCorp's 2025 actual expenditure for AI-03 (Transmission Detail Inspections) exceeded the planned budget because the cost per detailed inspection was higher than assumed in the **2025 WMP Update**. Although the number of structures requiring

detailed inspection in 2025 was slightly lower than forecast, the unit cost to perform the inspections was greater than anticipated, resulting in total expenditures above the planned level.”

Additionally, PacifiCorp’s **2025 EOY** provided a territory OPEX and HFTD OPEX actual value expenditure for AI-01, AI-02, AI-03, AI-04, AI-05, AI-06, AI-07, AI-08, and AI-11 of \$1870 (\$ thousand) and \$1100 (\$ thousand) respectively.

5.1.11 Distribution Detail Inspections (AI-04)

5.1.11.1 Initiative Review

Section 8.1.3.2 of PacifiCorp’s **2025 WMP** states that distribution detail inspections are performed to maintain regulatory compliance with California GO 95 and 165 regulations. PacifiCorp states that the inspections involve a careful visual inspection accomplished by visiting each structure, as well as inspecting adjacent spans between structures, which is intended to identify potential nonconformance with GO 95 and 165 or other applicable state requirements, infringement by other utilities or individuals, defects, potential safety hazards, and deterioration of the facilities that need to be corrected to maintain reliable and safe service.

The **2025 WMP** identified an annual target of 10,135 distribution detail inspections and the **2025 Q4 QDR** indicated that 18,556 distribution detail inspections were conducted in 2025, surpassing the target by 8,421 inspections.

To confirm that the 18,556 distribution detail inspections were conducted, the IE requested a full population list of these inspections with unique identifiers in *DR 3*. In response, PacifiCorp provided evidence document **CA 2025 Inspections Performed.xlsx**, which contained unique identifiers for each of the 18,556 distribution detail inspections.

The IE then requested evidence for a random sample of 91 distribution detail inspections (73 with a margin of error of 18) in *DR 4* to verify that the inspections were conducted. PacifiCorp provided a PDF report generated by its Facility Point Inspection database for each of the 91 inspections sampled. PacifiCorp also provided a document to assist the IE in interpreting the PDFs (**UNDERSTANDING_THE_FP22_INSPECTION_SCREEN.PDF**).

The IE reviewed each of the 91 PDFs to verify that for each distribution facility point, a detailed inspection (categorized as “DETAIL”) was performed in 2025. The IE noted that two of the PDFs provided included not one, but two inspections categorized as “DETAIL” in 2025 and inquired about this in *DR 7*. PacifiCorp explained that:

“A small percentage of Grid Hardening inspection data was inadvertently uploaded to the FPI Mainframe. Because inspection activities overlapped, both inspection records appeared in the system. This issue was corrected at the time for most records, and DETAIL & PTT inspections and Grid Hardening inspections

are now tracked separately to avoid confusion. We are currently performing a deeper review to identify any records that may not have been fully resolved during the initial cleanup. Any identified inspections will be removed from the mainframe.

However, this situation may still occur if an inspection area fails the QA/QC process. In those cases, multiple records are expected, one documenting the original failed inspection and another documenting the reworked inspection.”

The IE notes that this explanation raises some concerns regarding data quality for AI-04. However, the IE acknowledges PacifiCorp’s assertion that this issue involves a small number of records, was largely resolved at the time, and will be further resolved in the future.

Finding

The initiative has an IE Finding of “Initiative Validated” with an IVR of 183%.

Based on the desktop review of the evidence provided, the IE has reasonable assurance that PacifiCorp conducted the 18,556 distribution detail inspections reported, exceeding the target set in its **2025 WMP**.

5.1.11.2 Funding Verification

PacifiCorp’s **2025 EC AIR** provided a projected budget of \$221 (\$ thousand) and an actual budget of \$578 (\$ thousand) for an absolute percent difference of 162%. PacifiCorp’s variance explanation was as follows:

“PacifiCorp’s 2025 actual expenditure for AI-04 (Distribution Detail Inspections) exceeded the planned budget because the number of required inspections in 2025 was significantly higher than assumed in the 2023–2025 Base WMP. Due to the Tier 2/3 pilot program transitioning from a five-year cycle to a two-year cycle for detail inspections, starting in 2025, the total number of inspections increased by approximately 8,000 above the planned target. This higher inspection volume resulted in actual expenditures above the planned level.”

Additionally, PacifiCorp’s **2025 EOY** provided a territory OPEX and HFTD OPEX actual value expenditure for AI-01, AI-02, AI-03, AI-04, AI-05, AI-06, AI-07, AI-08, and AI-11 of \$1870 (\$ thousand) and \$1100 (\$ thousand) respectively.

5.1.12 Transmission Intrusive Pole Inspections (AI-05)

5.1.12.1 Initiative Review

Section 8.1.3.3 of PacifiCorp’s **2025 WMP** describes the transmission intrusive pole inspections program. These inspections may include pole-sounding, inspection hole drilling, and excavation tests that are designed to identify decay, wear, or woodpecker

damage, assess the condition of wood poles, and identify the need for any treatment, repair, or replacement. Like other inspection programs, intrusive inspections mitigate some wildfire risk by identifying and correcting conditions. In this case, the inspections identify poles for replacement or reinforcement to prevent potential structural failure of a pole that could lead to a potential wire-down event and ignition risk. The intrusive pole inspections are performed consistently with the cycle prescribed in California GO 165.

The **2025 WMP** identified an annual target of 1,257 transmission intrusive pole inspections and the **2025 Q4 QDR** indicated that 1,246 transmission intrusive pole inspections were conducted in 2025, 11 inspections short of the **2025 WMP** target. The **2025 EC AIR** highlighted that “The remaining 11 inspection locations were determined to be either retired facility points or incorrectly labeled in the system and did not meet the criteria for inspection as part of this initiative (e.g., one location was incorrectly noted as overhead when it was underground). PacifiCorp considers this initiative complete for 2025 and does not have any corrective actions for the slight variance.”

To verify that the 1,246 transmission intrusive pole inspections were indeed conducted, the IE requested a full population list of the inspections with unique identifiers in *DR 3*. In response, PacifiCorp provided evidence document **CA 2025 Inspections Performed.xlsx**, which contained evidence of 1,246 transmission intrusive pole inspections, each with a unique identifier.

The IE then requested evidence for a sample size of 86 transmission intrusive pole inspections (69 with a margin of error of 17) in *DR 4* to further verify that the inspections were conducted. PacifiCorp provided a PDF report generated by its Facility Point Inspection database for each of the 86 transmission intrusive pole inspections sampled. PacifiCorp also provided a document to assist the IE in interpreting the PDFs (**UNDERSTANDING_THE_FP22_INSPECTION_SCREEN.PDF**).

Through review of the evidence provided in responses to *DR 4* the IE was able to verify the completion of all 86 sampled transmission detailed inspections.

Finding

The initiative has an IE Finding of “Initiative Validated” with an IVR of 99%.

Based on the desktop review of the evidence provided, the IE has reasonable assurance that PacifiCorp completed transmission intrusive pole inspections for 1,246 poles in 2025. Although PacifiCorp did not meet the target of 1,257 poles listed in the **2025 WMP**, the **2025 EC AIR** states that “11 inspection locations were determined to be either retired facility points or incorrectly labeled in the system and did not meet the criteria for inspection as part of this initiative (e.g., one location was incorrectly noted as overhead when it was underground).” Because of this, the IE has reasonable assurance that PacifiCorp completed the entirety of the available population, with the shortfall attributable to a data management error.

Funding Verification

PacifiCorp's **2025 EC AIR** provided a projected budget of \$64 (\$ thousand) and an actual budget of \$131 (\$ thousand) for an absolute percent difference of 105%. PacifiCorp's variance explanation was as follows:

"PacifiCorp's 2025 actual expenditure for AI-05 (Transmission Intrusive Pole Inspections) exceeded the planned budget because more transmission poles required intrusive inspection in 2025 than assumed in the **2025 WMP Update**. Intrusive inspection volumes vary annually based on the pole inspection cycle and the number of structures scheduled for testing in a given year. The higher inspection volume in 2025 resulted in actual expenditures above the planned level."

Additionally, PacifiCorp's **2025 EOY** provided a territory OPEX and HFTD OPEX actual value expenditure for AI-01, AI-02, AI-03, AI-04, AI-05, AI-06, AI-07, AI-08, and AI-11 of \$1870 (\$ thousand) and \$1100 (\$ thousand) respectively.

5.1.13 Distribution Intrusive Pole Inspections (AI-06)

5.1.13.1 Initiative Review

Section 8.1.3.3 of PacifiCorp's **2025 WMP** describes the distribution intrusive pole inspections program. These inspections may include pole-sounding, inspection hole drilling, and excavation tests that are designed to identify decay, wear, or woodpecker damage, assess the condition of wood poles, and identify the need for any treatment, repair, or replacement. Like other inspection programs, intrusive inspections mitigate some wildfire risk by identifying and correcting conditions. In this case, the inspections identify poles for replacement or reinforcement to prevent potential structural failure of a pole that could lead to a potential wire-down event and ignition risk. The intrusive poles inspections are performed consistent with the cycle prescribed in California GO 165.

PacifiCorp's **2025 WMP** identified an annual target of 3,173 distribution intrusive pole inspections and the **2025 Q4 QDR** indicated that 3,162 distribution intrusive pole inspections were performed in 2025, a shortfall of eleven inspections. According to PacifiCorp's **2025 EC AIR**, "The remaining 11 inspection locations were determined to be either retired facility points or incorrectly labeled in the system and did not meet the criteria for inspection as part of this initiative (e.g., one location was incorrectly noted as overhead when it was underground). Pacific Power considers this initiative complete for 2025 and does not have any corrective actions for the variance."

To verify that the 3,162 distribution intrusive pole inspections were conducted, the IE requested a full population list of the 3,162 inspections with unique identifiers in *DR 3*. In response, PacifiCorp provided evidence document **CA 2025 Inspections Performed.xlsx**, which contained evidence of 3,162 distribution intrusive pole inspections, each with a unique identifier.

The IE then requested evidence for a sample size of 89 distribution intrusive pole inspections (71 with a margin of error of 18) in *DR 4* to further verify that the inspections were conducted. PacifiCorp provided a PDF report generated by its Facility Point

Inspection database for each of the 89 distribution intrusive pole inspections sampled. PacifiCorp also provided a document to assist the IE in interpreting the PDFs (**UNDERSTANDING_THE_FP22_INSPECTION_SCREEN.PDF**).

Through review of the evidence provided in responses to *DR 6* the IE was able to verify the completion of all 89 sampled transmission detailed inspections.

Finding

The initiative has an IE Finding of “Initiative Validated” with an IVR of 99.7%.

Based on the desktop review of the evidence provided, the IE has reasonable assurance that PacifiCorp performed the 3,162 distribution instructive pole inspections reported. Although PacifiCorp did not meet the PacifiCorp **2025 WMP** target of 3,173 inspections, the PacifiCorp’s **2025 EC AIR** states that this was due to retirements and incorrect labeling of facility points that did not meet the criteria for inspection.

5.1.13.2 Funding Verification

PacifiCorp’s **2025 EC AIR** provided a projected budget of \$175 (\$ thousand) and an actual budget of \$135 (\$ thousand) for an absolute percent difference of 23%. PacifiCorp’s variance explanation was as follows:

“PacifiCorp’s 2025 actual expenditure for AI-06 (Distribution Intrusive Pole Inspections) was lower than the planned budget because fewer distribution poles required intrusive inspection in 2025 than assumed in the **2025 WMP Update**. Intrusive inspection volumes vary annually based on the inspection cycle and the number of poles scheduled for testing in a given year. The lower inspection volume resulted in actual expenditures below the planned level.”

Additionally, PacifiCorp’s **2025 EOY** provided a territory OPEX and HFTD OPEX actual value expenditure for AI-01, AI-02, AI-03, AI-04, AI-05, AI-06, AI-07, AI-08, and AI-11 of \$1870 (\$ thousand) and \$1100 (\$ thousand) respectively.

5.1.14 Enhanced (Infrared) Inspection – Transmission Lines (AI-07)

5.1.14.1 Initiative Review

Section 8.1.3.6 of PacifiCorp’s **2025 WMP** describes the enhanced (infrared) inspections in transmission lines program. Enhanced transmission line inspections have been implemented with a focus on proactive identification and prevention of equipment failures. The inspections are performed annually with the inspections scheduled during peak loading intervals. The inspections are conducted aerially with a helicopter and a licensed thermographer.

The **2025 WMP** identified an annual target of 700 line-miles inspected and the **2025 Q4 QDR** indicated that 1,567 line-miles of infrared (IR) inspections of transmission lines were completed in 2025, exceeding the target.²¹

To confirm that the 1,567 line-miles were inspected, the IE requested, in *DR 3*, a full population list of the 1,567 line-miles inspected with unique identifiers. In response, PacifiCorp provided a list of 12,169 facility points corresponding to the 1,567 line-in **CA 2025 Inspections Performed.xlsx**. (PacifiCorp explained that inspections are more easily tracked on a facility point basis)

The IE then requested evidence for a sample size of 23 line-miles (18 with a margin of error of 5) in *DR 4* to further verify that the inspections were conducted. PacifiCorp provided a PDF report generated by its Facility Point Inspection database for each of the 23 IR inspections sampled. Through review of the evidence provided in responses to *DR 4*, the IE was able to verify the completion of all 23 sampled transmission detail inspections.

Finding

The initiative has an IE Finding of “Initiative Validated” with an IVR of 224%.

Based on the desktop review of the evidence provided, the IE has reasonable assurance that PacifiCorp performed 1,567 line-miles of transmission IR inspections in 2025.

5.1.14.2 Funding Verification

PacifiCorp’s **2025 EC AIR** provided a projected budget of \$90 (\$ thousand) and an actual budget of \$87 (\$ thousand) for an absolute percent difference of 3%. Additionally, PacifiCorp’s **2025 EOY** provided a territory OPEX and HFTD OPEX actual value expenditure for AI-01, AI-02, AI-03, AI-04, AI-05, AI-06, AI-07, AI-08, and AI-11 of \$1870 (\$ thousand) and \$1100 (\$ thousand) respectively.

5.1.15 Enhanced (Infrared) Inspection – Distribution Lines (AI-08)

5.1.15.1 Initiative Review

Section 8.1.3.5 of PacifiCorp’s **2025 WMP** describes the enhanced (infrared) inspections in distribution lines program. In 2022, PacifiCorp initiated a pilot to build upon the successes of the transmission infrared inspection program described in section 8.1.3.6 and determine whether using infrared at distribution voltages could detect hot spots. For 2023 and 2024, PacifiCorp expanded the 2022 pilot to include all distribution line-miles within the HFTD to evaluate how the program might work on a larger scale.

²¹ The **2025 EC AIR** reported 692 line-miles completed in 2025. Due to the **2025 EC AIR** being published after completion of the IE review, the IE used the 2025 Q4 QDR value of 1,567 line-miles for its evaluation.

The **2025 WMP** identified an annual target of TBD line-miles, pending evaluation of the 2023-2024 pilot results. The **2025 Q4 QDR** indicated that 1,300 line-miles of infrared (IR) inspections of distribution lines were completed in 2025.

To confirm that 1,300 line-miles were inspected, the IE requested in *DR 3* a full population list of the 1,300 line-miles inspected with unique identifiers. In response, PacifiCorp provided a list of the 31,106 facility points corresponding to these 1,300 line-miles, with a unique identifier for each pole, within the evidence document **CA 2025 Inspections Performed.xlsx** (PacifiCorp explained that inspections are more easily tracked on a facility point basis).

The IE then requested evidence for a random sample of 23 line-miles (18 with a margin of error of five) in *DR 4* to further verify that an IR inspection was conducted for each in 2025. PacifiCorp provided a PDF report generated by its Facility Point Inspection database for each of 23 facility points sampled. PacifiCorp also provided a mapping document to assist the IE in interpreting the PDFs (**UNDERSTANDING_THE_FP22_INSPECTION_SCREEN.PDF**).

The IE reviewed each of the 23 PDFs to verify that for each facility points sampled, an IR inspection (categorized as “ENHANCED”) was performed in 2025. Through review of the evidence provided in response to *DR 4* the IE was able to verify the completion of all 23 sampled facility points for enhanced (infrared) inspections in distribution lines.

As an additional point of verification, the IE reviewed the **2025 EC AIR**, which was published after the completion of the desktop review, to validate PacifiCorp’s reporting for the AI-08 initiative. The **2025 EC AIR** states that the target for 2025 was 1,300 line-miles, and that they completed 32,286 enhanced (infrared) inspection on distribution lines, equating to 1,300 line-miles. The IE notes that the 2025 target and completion value are in line with the **2025 Q4 QDR**, but there was a roughly 4% difference in reporting of data points (inspections and/or facility points) to achieve the annual target.

Finding

The initiative has an IE Finding of “Initiative Validated”.²²

Based on the desktop review of the evidence provided, the IE has reasonable assurance that PacifiCorp completed Enhanced (Infrared) Inspections in Distribution Lines of 1,300 line-miles in 2025.

5.1.15.2 Funding Verification

PacifiCorp’s **2025 EC AIR** provided a projected budget of \$0 (\$ thousand) and an actual budget of \$218 (\$ thousand). PacifiCorp’s variance explanation was as follows:

²² An IVR cannot be calculated due to PacifiCorp not providing a target for AI-08

“PacifiCorp’s 2025 actual expenditure for AI-08 (Enhanced (Infrared) Inspections in Distribution Lines) exceeded the planned budget because no funding was originally included for 2025 at the time the 2023–2025 Base WMP was filed. The pilot program for enhanced infrared inspections was scoped only for 2023 and 2024, and, as noted in Table 8-4 of the WMP, any 2025 activity was contingent on the results of the pilot. Following the 2024 inspection season, the pilot was approved to continue into 2025, including expansion into the HFTD. As a result, inspection work proceeded in 2025 even though no dollars had been budgeted for this initiative, leading to actual expenditures above the planned level.”

Additionally, PacifiCorp’s **2025 EOY** provided a territory OPEX and HFTD OPEX actual value expenditure for AI-01, AI-02, AI-03, AI-04, AI-05, AI-06, AI-07, AI-08, and AI-11 of \$1870 (\$ thousand) and \$1100 (\$ thousand) respectively.

5.1.16 Substation Inspections (AI-11)

5.1.16.1 Initiative Review

Section 8.1.3.4 of PacifiCorp’s **2025 WMP** describes the substation inspections program, which assesses both the substation security and the condition of key equipment, identifying potential corrective work or maintenance needed. This corrective work and maintenance mitigate the risk of mis-operations that could negatively impact system operation and protection and control schemes in place. Substation equipment, such as circuit breakers and relays, are critical components of protection and control schemes and system operations and can have an impact on overhead line operation.

PacifiCorp’s **2025 WMP** identified the annual target for 2025 as 451 substation inspections, while PacifiCorp’s 2025 Q4 QRD reported that 450 inspections were conducted, falling short of the target by one inspection. According to PacifiCorp’s **2025 EC AIR**, this difference was due to “The inspection plan was adjusted due to Western Electricity Coordinating Council path changes, resulting in one fewer required inspection. PacifiCorp considers this initiative complete for 2025 and does not have any corrective actions for the variance.”

To confirm that 450 substation inspections were conducted, the IE requested the full population list of inspections with unique identifiers in *DR 3*. In response, PacifiCorp provided a list of the 450 substation inspections performed with dates, substations, and unique identifiers (in the form of work order numbers) in evidence document **AI-11_CA 2025 Substation Inspections.xlsx**.

The IE then requested evidence for a random sample of 23 substation inspections (18 with a margin of error of five) in *DR 4* to further verify that the inspections were conducted. This document included details of 23 substation inspections, including the work order number and description, the date of inspection, and the fields inspected (e.g., oil levels, vegetation clearance, alarms, etc.). The IE reviewed this document to

verify that for each work order number sampled, an inspection at the corresponding substation was completed on the date in 2025 reported in *DR 3*.

Finding

The initiative has an IE Finding of “Initiative Validated” with an IVR of 99.8%.

Based on the desktop review of the evidence provided, the IE has reasonable assurance that PacifiCorp conducted 450 substation inspections in 2025 one inspection short of the **2025 WMP** target of 451. The inspection plan was adjusted due to Western Electricity Coordinating Council path changes, which PacifiCorp states accounts for the change in target to 450 inspections.

5.1.16.2 Funding Verification

PacifiCorp’s **2025 EC AIR** provided a projected budget of \$180 (\$ thousand) and an actual budget of \$175 (\$ thousand) for an absolute percent difference of 3%. Additionally, PacifiCorp’s **2025 EOY** provided a territory OPEX and HFTD OPEX actual value expenditure for AI-01, AI-02, AI-03, AI-04, AI-05, AI-06, AI-07, AI-08, and AI-11 of \$1870 (\$ thousand) and \$1100 (\$ thousand) respectively.

5.1.17 Quality Assurance and Quality Control (AI-12)

5.1.17.1 Initiative Review

Section 8.1.6 of PacifiCorp’s **2025 WMP** states that to perform quality assurance and quality control (QA/QC) of asset inspections, PacifiCorp uses a combination of process controls, software tools, company policy, and physical-record checking to quickly identify inaccuracies for corrective action, evaluation, root cause analysis, and system improvements. The document adds that engaging in these initiatives is a cost-effective means to minimize the risk that inspection results are inaccurate or unreliable. Inspection results are reviewed continuously to confirm that inspections in the HFTD are meeting acceptable standards of performance. PacifiCorp’s main QA/QC components include physical audits of at least 5% of planned inspections of facilities.

The **2025 WMP** identified an annual target of 756 QA/QC inspections. This target was equivalent to 5% of the total number of inspections targeted under AI-03, AI-04, AI-05, and AI-06. The **2025 Q4 QDR** indicated that 1,567 QA/QC inspections were conducted in 2025, surpassing the target by 811 inspections and exceeding 5% of the total number of inspections reported as completed under AI-03, AI-04, AI-05, and AI-06 (23,473, of which 5% is 1,174).²³

To confirm that 1,567 QA/QC inspections were completed, the IE requested a full population list of these inspections with unique identifiers in *DR 3*. In response,

²³ The **2025 EC AIR** reported 1887 line-miles completed in 2025. Due to the **2025 EC AIR** being published after completion of the IE review, the IE used the **2025 Q4 QDR** value of 1,567 line-miles for its evaluation.

PacifiCorp provided evidence document **CA 2025 Inspections Performed.xlsx**, which contained unique identifiers for each of the 1,567 QA/QC inspections.

The IE then requested evidence for a random sample of 23 QA/QC inspections (18 with a margin of error of five) in *DR 4* to verify that 1,567 inspections were conducted. PacifiCorp provided a PDF report generated by its Facility Point Inspection database for each of the 23 inspections sampled. PacifiCorp also provided a document to assist the IE in interpreting the PDFs (**UNDERSTANDING_THE_FP22_INSPECTION_SCREEN.PDF**).

The IE reviewed each of the 23 PDFs to verify that for each asset inspection ID in the sample, a QA/QC inspection (categorized as “AUDIT”) took place in 2025. The IE noted that five of the PDFs included two inspections categorized as “AUDIT” in 2025 and inquired about this in *DR 7*. PacifiCorp explained that multiple audit inspections may be conducted on the same structure as part of the QA/QC process and that in these cases an internal audit team audited an external audit.

Finding

The initiative has an IE Finding of “Initiative Validated” with an IVR of 207%.

Based on the desktop review of the evidence provided, the IE has reasonable assurance that PacifiCorp conducted the 1,567 QA/QC inspections reported, exceeding the target set in its **2025 WMP**.

5.1.17.2 Funding Verification

PacifiCorp’s **2025 EC AIR** provided a projected budget of \$36 (\$ thousand) and an actual budget of \$66 (\$ thousand) for an absolute percent difference of 83%. PacifiCorp’s variance explanation was as follows:

“PacifiCorp’s 2025 actual expenditure for AI-12 (Quality Assurance and Quality Control) exceeded the planned budget because the total number of inspections subject to QA/QC review in 2025 was higher than anticipated in the 2023–2025 Base WMP. QA/QC activity levels are directly driven by the volume of transmission and distribution inspections completed each year, and increased inspection counts resulted in higher QA/QC workload and associated costs, leading to actual expenditures above the planned level.”

Additionally, PacifiCorp’s **2025 EOY** provided a territory OPEX and HFTD OPEX actual value expenditure for AI-12 of \$66 (\$ thousand) and \$43 (\$ thousand) respectively.

5.1.18 Equipment Settings to Reduce Wildfire Risk (GO-01)

5.1.18.1 Initiative Review

Section 8.1.8.1 of PacifiCorp's **2025 WMP** describes how adjustments to power system operations can help mitigate wildfire risk. System operations adjustments generally include the modification of relay settings for protective devices on distribution lines or changes to line re-energization testing protocols. These adjustments are not universally applied to power system operations because there are certain disadvantages in their use, especially because they may increase outage frequency and duration experienced by customers. In other words, a balance is required to provide customers with reliable power while still mitigating wildfire risk. To help balance these concerns, PacifiCorp is deploying technologies such as fault indicators.

Finding

While this initiative did have a budgeted spend for 2025, which was recorded in the **2025 EOY**, it did not have a quantitative or qualitative target for the same period. Therefore, the IE did not perform a detailed review of the initiative as part of the 2025 Independent Evaluation.

5.1.18.2 Funding Verification

PacifiCorp's **2025 EC AIR** did not provide a planned or actual budget, absolute variance, or variance explanation for GO-01.

PacifiCorp's **2025 EOY** provided a territory CAPEX and HFTD CAPEX actual value expenditure for GO-01 of \$590 (\$ thousand) and \$310 (\$ thousand) respectively. The EOY also provided a territory OPEX and HFTD OPEX actual value expenditure for GO-01 of \$262 (\$ thousand) and \$138 (\$ thousand) respectively. PacifiCorp's explanation for tracking in the EOY and not the AIR was as follows:

"PacifiCorp acknowledges that GO-01 was omitted from the AIR expenditure table. This was a reporting error in the AIR, not an indication that GO-01 expenditures were unavailable or not tracked.

GO-01, Equipment Settings to Reduce Wildfire Risk, was captured separately in the EOY report, which identifies GO-01 as the applicable utility mitigation activity tracking ID and reports the associated 2025 actual expenditures by expense type."

5.1.19 Grid Response Procedures and Notifications (GO-02)

5.1.19.1 Initiative Review

Section 8.1.8.3 of PacifiCorp's **2025 WMP** describes its personnel work procedures and training in conditions of elevated fire risk. During fire season, PacifiCorp modifies field

operations and work practices to further mitigate wildfire risk. Additionally, PacifiCorp invests in tools and equipment to mitigate wildfire risk.

Finding

While this initiative did have a budgeted spend for 2025, which was recorded in the **2025 EOY** and was validated via the **2025 EC AIR**, it did not have a quantitative or qualitative target for the same period. Therefore, the IE did not perform a detailed review of the initiative as part of the 2025 Independent Evaluation.

5.1.19.2 Funding Verification

PacifiCorp's **2025 EC AIR** provided a projected budget of \$600 (\$ thousand) and an actual budget of \$152 (\$ thousand) for an absolute percent difference of 75%. PacifiCorp's variance explanation was as follows:

"PacifiCorp's 2025 expenditure for GO-02 (Grid Response Procedures and Notifications (Grid Ops): Patrols) was less than the planned 2025 budget due to a change to PacifiCorp's Wildfire Encroachment System Operations Procedure SOP-203, which resulted in fewer post outage patrols in 2025. This resulted in lower operations and maintenance and less expenditure than planned."

Additionally, PacifiCorp's **2025 EOY** provided a territory CAPEX actual value expenditure for GO-02 of \$152 (\$ thousand).

5.1.20 Equipment Maintenance and Repair (MA-01)

5.1.20.1 Initiative Review

Section 8.1.4 of PacifiCorp's **2025 WMP** states that equipment maintenance and repair activities are a key component of ensuring that in-service equipment on the system remains reliable and operates properly. As part of these activities, PacifiCorp performs maintenance activities and schedule for its assets based on company Policy 001, as well as annual maintenance and calibration of its weather station fleet to ensure that each weather station is operational and reporting correct and accurate data.

The **2025 WMP** stated that PacifiCorp's annual target under MA-01 for 2025 was to continue planned transmission and distribution wires maintenance, as well as planned substation apparatus maintenance programs. The **2025 Q4 QDR** reported continue planned transmission and distribution wires maintenance and continue planned substation apparatus maintenance programs and marked both as complete.

To verify the continued planned maintenance the IE requested evidence as part of *DR 5*. In response to *DR 5* PacifiCorp provided **CA_2025 APP_Substation Maintenance.xlsx**, and **CA_2025 Wires Maintenance.xlsx** which demonstrated the work performed in 2025.

Additionally, as part of *DR 9*, the IE requested clarification on the change in projected spend for MA-01 from \$325 (\$ thousand) to \$410 (\$ thousand) and the reference to “new weather station maintenance contractor” even though the target for MA-01 for 2025 was not directly related to weather station maintenance and/or calibration. In response to *DR 9* PacifiCorp provided

CALIFORNIA_WEATHER_STATION_2025_MAINTENANCE.xlsx which showed the maintenance and/or calibrations performed on the weather stations in 2025 as well as the following:

“Each weather station is entered into the company's asset management system, SAP, with a maintenance plan associated with it. The maintenance plan generates work orders for the maintenance work required in the calendar year following the maintenance interval as outline in Policy 001. The work orders are only closed when there has been a verified maintenance form submitted for that equipment. Provided is the

CALIFORNIA_WEATHER_STATION_2025_MAINTENANCE.xlsx document which has the SAP equipment number, the work order, the work order status, and the date of completion within the asset management system. These are all weather stations that were completed by the contractor brought on for the annual weather station calibrations.”

Upon review of the files provided and detailed explanations the IE able to verify the targets set forth for MA-01 in 2025.

Finding

The initiative has an IE Finding of “Initiative Validated”.²⁴

Based on the desktop review of the evidence provided, the IE has reasonable assurance that PacifiCorp continued planned transmission and distribution wires maintenance and continued planned substation apparatus maintenance programs, meeting the target set in the **2025 WMP**.

5.1.20.2 Funding Verification

PacifiCorp’s **2025 EC AIR** provided a projected budget of \$410 (\$ thousand) and an actual budget of \$399 (\$ thousand) for an absolute percent difference of 3%. Additionally, PacifiCorp’s **2025 EOY** provided a territory CAPEX and HFTD CAPEX actual value expenditure for MA-01 and SA-01 of \$141 (\$ thousand) and \$106 (\$ thousand) respectively. The EOY also provided a territory OPEX and HFTD OPEX actual value expenditure for MA-01 and SA-01 of \$399 (\$ thousand) and \$219 (\$ thousand) respectively.

²⁴ An IVR cannot be calculated for qualitative initiatives. The Initiative Finding is based on the IE having reasonable assurance that PacifiCorp completed its qualitative target.

5.1.21 Synthesis of Findings

5.1.21.1 Initiative Review

Overall, The IE has reasonable assurance of PacifiCorp's Grid Operations and Maintenance initiative (GH-01, GH-02, GH-03, GH-04, GH-05, GH-12, AI-01, AI-02, AI-03, AI-04, AI-05, AI-06, AI-07, AI-08, AI-11, AI-12, GO-01, GO-02, MA-01) were met for 2025, including meeting or exceeding 2025 annual targets.

The IE identified several repeated issues related to reporting, documentation, and data tracking. In the Distribution Pole Replacement (GH-02) review, the IE found duplicate Asset IDs in the sample and one pole that was incorrectly reported as replaced in the Q4 2025 QDR. In the Installation of System Automation Equipment (GH-04) initiative, evidence for Expulsion Fuse Replacement (GH-05) was initially submitted for Installation of System Automation Equipment (GH-04), and after additional review and documentation being provided the IE was able to verify 21 of the 23 devices reported as installed in the 2025 QDR were replaced. This emphasizes the lack of established and repeatable reporting, documentation, and data tracking strategies.

Similar issues were also noted in inspection programs, specifically for Transmission Intrusive Pole Inspections (AI-05) and Distribution Intrusive Pole Inspections (AI-06) where some reported shortfalls were tied to retired or incorrectly labeled assets and some records showed overlapping or duplicate inspections. While these issues did not generally change the IE's finding that the work was completed, the IE notes that they reduce confidence in the accuracy and consistency of some reported results and show weaknesses in the reporting process.

5.1.21.2 Funding Verification

Initiative ID	Initiative	Planned Spend (\$ Thousands)	Actual Spend (\$ Thousands)	Variance	Variance Description ²⁵
GH-01	Line Rebuild – Covered Conductor Installation	\$120,000	\$182,582	52%	PacifiCorp's 2025 expenditure for GH-01 (Line Rebuild – Covered Conductor Installation) exceeded the budget estimated in the 2025 WMP Update primarily because the cost per mile of installing covered conductor was higher than anticipated due to upgraded agreements with design and construction contractors. Some incremental contract changes included field engineering support, post-construction inspections, and extended warranty. Additionally, PacifiCorp completed additional design scoping in 2025 to have designs and permits in place for 2026 work.

²⁵ The Office of Energy Infrastructure Safety does not require variance descriptions for absolute variances less than 10%.

Initiative ID	Initiative	Planned Spend (\$ Thousands)	Actual Spend (\$ Thousands)	Variance	Variance Description ²⁵
GH-04	Installation of System Automation Equipment	\$2,500	\$7,158	186%	PacifiCorp's 2025 expenditure for GH-04 (Installation of System Automation Equipment) exceeded the budget estimated in the 2023–2025 Base WMP for several reasons. The estimated budget was based on the installation of 10 units; however, in accordance with Energy Safety guidance, PacifiCorp completed 23 units, including 13 units not completed in prior years. This resulted in an increase in the overall amount of work completed and associated costs for this initiative. Furthermore, the cost per unit was higher than anticipated due to the engagement of a construction project management company to oversee system hardening projects, as well as higher-than-expected costs associated with extending communications to field devices.

Initiative ID	Initiative	Planned Spend (\$ Thousands)	Actual Spend (\$ Thousands)	Variance	Variance Description ²⁵
GH-05	Expulsion Fuse Replacement	\$1,000	\$1,455	46%	PacifiCorp's 2025 expenditure for GH-05 (Expulsion Fuse Replacement) exceeded the budget estimated in the 2025 WMP Update primarily because the budget was based on 500 fuse replacements, and 932 were completed. GH-05 includes both targeted fuse replacements and fuse replacements performed concurrently with line rebuild work under GH-01. In 2025, the company completed 181 targeted fuse replacements and an additional 751 replacements concurrently with line rebuild work. As outlined in PacifiCorp's 2025 WMP Update, the company prioritizes the replacement of expulsion fuses in coordination with line rebuild projects whenever practical. Performing fuse replacements during line rebuild activities is an intentional strategy to maximize operational efficiency and minimize overall system costs for customers.

Initiative ID	Initiative	Planned Spend (\$ Thousands)	Actual Spend (\$ Thousands)	Variance	Variance Description ²⁵
AI-01	Transmission Patrol Inspections	\$87	\$55	-37%	PacifiCorp's 2025 actual expenditure for AI-01 (Transmission Patrol Inspections) was lower than the planned budget because the cost to complete the inspections in 2025 was less than originally forecast in the 2023–2025 Base WMP. When Transmission Detail Inspections (AI-03) were completed before the scheduled Transmission Patrol Inspections (AI-01) for the same assets, the Patrol Inspections (AI-01) were not performed, avoiding duplicative work and therefore lowering the overall spend on AI-01.
AI-02	Distribution Patrol Inspections	\$268	\$443	65%	PacifiCorp's 2025 actual expenditure for AI-02 (Distribution Patrol Inspections) exceeded the planned budget because the number of required patrol inspections in 2025 was significantly higher than assumed in the 2023–2025 Base WMP. Following a change in the safety assurance frequency to an annual inspection requirement, the total number of overhead distribution safety patrols increased by approximately 8,000 units compared to the original WMP target. This higher inspection volume resulted in actual expenditures above the planned level.

Initiative ID	Initiative	Planned Spend (\$ Thousands)	Actual Spend (\$ Thousands)	Variance	Variance Description ²⁵
AI-03	Transmission Detail Inspections	\$20	\$48	138%	PacifiCorp's 2025 actual expenditure for AI-03 (Transmission Detail Inspections) exceeded the planned budget because the cost per detailed inspection was higher than assumed in the 2025 WMP Update . Although the number of structures requiring detailed inspection in 2025 was slightly lower than forecast, the unit cost to perform the inspections was greater than anticipated, resulting in total expenditures above the planned level.
AI-04	Distribution Detail Inspections	\$221	\$578	162%	PacifiCorp's 2025 actual expenditure for AI-04 (Distribution Detail Inspections) exceeded the planned budget because the number of required inspections in 2025 was significantly higher than assumed in the 2023–2025 Base WMP. Due to the Tier 2/3 pilot program transitioning from a five-year cycle to a two-year cycle for detail inspections, starting in 2025, the total number of inspections increased by approximately 8,000 above the planned target. This higher inspection volume resulted in actual expenditures above the planned level.

Initiative ID	Initiative	Planned Spend (\$ Thousands)	Actual Spend (\$ Thousands)	Variance	Variance Description ²⁵
AI-05	Transmission Intrusive Pole Inspections	\$64	\$131	105%	PacifiCorp's 2025 actual expenditure for AI-05 (Transmission Intrusive Pole Inspections) exceeded the planned budget because more transmission poles required intrusive inspection in 2025 than assumed in the 2025 WMP Update . Intrusive inspection volumes vary annually based on the pole inspection cycle and the number of structures scheduled for testing in a given year. The higher inspection volume in 2025 resulted in actual expenditures above the planned level.
AI-06	Distribution Intrusive Pole Inspections	\$175	\$135	-23%	PacifiCorp's 2025 actual expenditure for AI-06 (Distribution Intrusive Pole Inspections) was lower than the planned budget because fewer distribution poles required intrusive inspection in 2025 than assumed in the 2025 WMP Update . Intrusive inspection volumes vary annually based on the inspection cycle and the number of poles scheduled for testing in a given year. The lower inspection volume resulted in actual expenditures below the planned level.
AI-07	Enhanced (Infrared) Inspections in Transmission Lines	\$90	\$87	-3%	N/A

Initiative ID	Initiative	Planned Spend (\$ Thousands)	Actual Spend (\$ Thousands)	Variance	Variance Description ²⁵
AI-08	Enhanced (Infrared) Inspections in Distribution Lines	\$0	\$218	N/A	PacifiCorp's 2025 actual expenditure for AI-08 (Enhanced (Infrared) Inspections in Distribution Lines) exceeded the planned budget because no funding was originally included for 2025 at the time the 2023–2025 Base WMP was filed. The pilot program for enhanced infrared inspections was scoped only for 2023 and 2024, and, as noted in Table 8-4 of the WMP, any 2025 activity was contingent on the results of the pilot. Following the 2024 inspection season, the pilot was approved to continue into 2025, including expansion into the HFTD. As a result, inspection work proceeded in 2025 even though no dollars had been budgeted for this initiative, leading to actual expenditures above the planned level.
AI-11	Substation Inspections	\$180	\$175	-3%	N/A

Initiative ID	Initiative	Planned Spend (\$ Thousands)	Actual Spend (\$ Thousands)	Variance	Variance Description ²⁵
AI-12	Quality Assurance and Quality Control	\$36	\$66	83%	PacifiCorp's 2025 actual expenditure for AI-12 (Quality Assurance and Quality Control) exceeded the planned budget because the total number of inspections subject to QA/QC review in 2025 was higher than anticipated in the 2023–2025 Base WMP. QA/QC activity levels are directly driven by the volume of transmission and distribution inspections completed each year, and increased inspection counts resulted in higher QA/QC workload and associated costs, leading to actual expenditures above the planned level.
GO-02	Grid Response Procedures and Notifications	\$600	\$152	-75%	PacifiCorp's 2025 expenditure for GO-02 (Grid Response Procedures and Notifications (Grid Ops): Patrols) was less than the planned 2025 budget due to a change to PacifiCorp's Wildfire Encroachment System Operations Procedure SOP-203, which resulted in fewer post outage patrols in 2025. This resulted in lower operations and maintenance and less expenditure than planned.
MA-01	Equipment Maintenance and Repair	\$410	\$399	-3%	N/A

5.2 Vegetation Management and Inspections

5.2.1 Summary Table

Initiative Number, WMP Section, and Name	WMP - Initiative Target	EC-Claimed Progress	EC- Claimed Initiative Status	Sample Size	Sample Validation Rate	Verification Method	IE Finding on Initiative [Initiative Validation Rate ²⁶]	WMP - Planned Spend (Thousands \$)	EC-Claimed Actual Spend (Thousands \$) [Variance]	Satisfied Risk Reduction Goal - Finding ²⁷
VM-01 8.2.2.1 Detailed Inspection – Distribution	826 Line Miles	826 Line Miles	Complete	18 Line Miles [20 Circuits or 100% of Circuits Performed]	100%	Desktop	100%	\$310	\$731 [136%]	N/A
VM-02 8.2.2.2 Detailed Inspection - Transmission	270 Line Miles	270 Line Miles	Complete	17 Line Miles [10 Lines or 100% of Lines Performed]	100%	Desktop	100%	\$87	\$112 [29%]	N/A
VM-03 8.2.2.3 Patrol Inspection - Distribution	1,182 Line Miles	1,182 Line Miles	Complete	18 Line Miles [42 Circuits or 100% of Circuits Performed]	100%	Desktop	100%	\$285	\$469 [65%]	N/A
VM-04 8.2.2.4 Patrol Inspection - Transmission	417 Line Miles	417 Line Miles	Complete	18 Line Miles [11 Lines or 100% of Lines Performed]	100%	Desktop	100%	\$102	\$84 [-18%]	N/A

²⁶ Initiative Validation Rate is equal to the Sample Validation Rate times the EC-Claimed Progress and then divided by the WMP-Initiative Target.

²⁷ PacifiCorp did not capture risk reduction goals in its **2025 WMP**. Thus, the IE could not validate if a goal was met.

Initiative Number, WMP Section, and Name	WMP - Initiative Target	EC-Claimed Progress	EC- Claimed Initiative Status	Sample Size	Sample Validation Rate	Verification Method	IE Finding on Initiative [Initiative Validation Rate ²⁶]	WMP - Planned Spend (Thousands \$)	EC-Claimed Actual Spend (Thousands \$) [Variance]	Satisfied Risk Reduction Goal - Finding ²⁷
VM-05 8.2.3.1.2 Pole Clearing	3126 Poles	3126 Poles	Complete	239 Poles	N/A ²⁸	Desktop & Field	Validation Inconclusive; Target and Progress Misleading	\$530	\$731 [38%]	N/A
VM-06 8.2.3.2 Clearance - Distribution	No Target	Not Reported	Not Reported	Sampling Not Utilized	Sampling Not Utilized	Desktop	Detailed Initiative Review Not Performed	\$12,770	\$13,467 [5%]	N/A
VM-07 8.2.3.2 Clearance - Transmission	No Target	Not Reported	Not Reported	Sampling Not Utilized	Sampling Not Utilized	Desktop	Detailed Initiative Review Not Performed	\$2,520	\$2,724 [8%]	N/A
VM-08 8.2.3.3 Fall-in Mitigation	No Target	Not Reported	Not Reported	Sampling Not Utilized	Sampling Not Utilized	Desktop	Detailed Initiative Review Not Performed	\$40	\$0 [-100%]	N/A
VM-11 8.2.5 Quality Assurance / Quality Control (Post- Audit Transmission)	417 Line Miles	417 Line Miles	Complete	62 Line- Miles [11 Lines or 100% of Lines Performed]	100%	Desktop	100%	\$165 ²⁹	\$233 [35%]	N/A
VM-11 8.2.5 Quality Assurance / Quality Control (Post- Audit Distribution)	1,182 Line Miles	1,182 Line Miles	Complete	124 Line- Miles [42 Circuits or 100% of Circuits Performed]	100%	Desktop	100%	\$165	\$233 [35%]	N/A

²⁸ See Section 5.2.6 Pole Clearing for explanation on why Sampling Validation Rate was assigned "N/A"

²⁹ For VM-11 there are two initiative targets, but spend for the initiative is rolled up to a single quantity, see Section 5.2.10.2 for more details on expenditure for VM-11

5.2.2 Detailed Inspection – Distribution (VM-01)

5.2.2.1 Initiative Review

According to Section 8.2.2.1 of PacifiCorp’s **2025 WMP**, the overall objective of detailed inspections of distribution lines is to minimize vegetation-related reliability, safety, and wildfire ignition risks. The document adds that PacifiCorp’s vegetation management program is compliant with GO 95, Rule 35, and applicable Public Resource Codes.

Detailed distribution inspections are generally performed on a planned cycle where vegetation along a circuit scheduled for cycle maintenance is inspected and vegetation requiring work is identified for pruning or removal. Detailed inspections are generally ground inspections.

The **2025 WMP** identified an annual target of 826 line-miles and the **2025 Q4 QDR** indicated that 826 line-miles were inspected in 2025, meeting the target.

To validate the 826 line-miles reported, the IE requested supporting documentation, such as a list demonstrating tracking of inspections, in *DR 3*. In response, PacifiCorp provided evidence document **CA_Miles_Units_2025.xlsx**, which contained a list of the 20 circuits inspected and the length and dates of inspection for each. These circuits totaled 834 line-miles. The IE inquired about the discrepancy with the 826 line-miles reported as complete, and PacifiCorp explained that:

“Due to the timing associated with developing initiative targets to include in the wildfire mitigation plan and timing of refining the vegetation management annual work plan, there is potential for mileages to differ between the two because of updates and changes made within the GIS data used to quantify the mileages. GIS data is continually updated to reflect operational changes or reconfigurations made in the field which may impact the mileage of a circuit expressed in the GIS data.”

Since detailed distribution inspections are tracked at the circuit level, the IE requested work releases documenting inspection of each circuit in *DR 7*. In response, PacifiCorp provided PDF copies of contractor work releases for each of the 20 circuits.

The IE examined each PDF to ensure that it contained the appropriate code for detailed distribution inspections (“DNT”) or otherwise indicated an inspection was conducted, covered the circuit’s full length consistent with the tracking document, and had a signature attesting to the inspection’s completion in 2025. In one case, the inspection was completed in late 2024. PacifiCorp explained that its inspection year runs from October to October, meaning that Q4 2024 inspections on circuits or lines planned for vegetation maintenance in 2025 are tracked as part of the 2025 work plan. This is consistent with the **2025 Q4 QDR**, which states that the 826 line-miles of 2025 VM-01 inspections were complete by the end of Q3.

Based on this explanation, the IE verified that all 2025 inspections reported were completed prior to October 2025 and identified two circuits that were not, based both on the work release dates and evidence document **CA_Miles_Units_2025.xlsx**. PacifiCorp acknowledged that these inspections were actually completed in Q4. However, the IE did review work releases demonstrating that the work identified on these two circuits was still completed by the end of 2025.

Additionally, in two cases, the IE noticed a discrepancy of less than a half mile between the line distance listed on the work release and the line distance indicated in the tracker. PacifiCorp indicated that these discrepancies could be due to data entry errors or differences in the GIS reports from which the data was drawn. PacifiCorp stated that it is making a concerted effort to reduce such errors.

Finding

The initiative has an IE Finding of “Initiative Validated” with an IVR of 100%.

Based on the desktop review of the evidence provided, the IE has reasonable assurance that PacifiCorp conducted 826 line-miles of detailed distribution inspections in 2025 and Q4 of 2024, consistent with its **2025 WMP** target, and that although two circuits were inspected in Q4 of 2025, after the target window, the identified work on these circuits was still resolved in 2025.

However, the IE notes that the progress reported in the **2025 Q4 QDR** erroneously shows that the 826 line-miles were completed by the end of Q3, when two circuits were completed in Q4, as acknowledged by PacifiCorp.

5.2.2.2 Funding Verification

PacifiCorp’s **2025 EC AIR** provided a projected budget of \$310 (\$ thousand) and an actual budget of \$731 (\$ thousand) for an absolute percent difference of 136%. PacifiCorp’s variance explanation was as follows:

*“PacifiCorp’s 2025 actual expenditure for VM-01 (Detailed Inspection – Distribution) exceeded the planned budget primarily due to an increase in required inspection volume following the establishment of the HFRA. As documented in the **2025 WMP Update**, PacifiCorp implemented the FireSight risk model and identified 728 miles of new HFRA territory, which must be inspected to the same standards as CPUC Tier 2 and Tier 3 HFTD areas. This operational change resulted in higher inspection volumes than assumed in the 2023–2025 Base WMP. As a result, the actual 2025 expenditures exceeded the planned budget.”*

Additionally, PacifiCorp’s **2025 EOY** provided a territory OPEX and HFTD OPEX actual value expenditure for VM-01, VM-02, VM-03, and VM-04 of \$1396 (\$ thousand) and \$950 (\$ thousand) respectively.

5.2.3 Detailed Inspection – Transmission (VM-02)

5.2.3.1 Initiative Review

According to Section 8.2.2.2 of PacifiCorp’s **2025 WMP**, the overall objective of detailed inspections of transmission lines is to minimize vegetation-related reliability, safety, and wildfire ignition risks, while maintaining compliance with applicable Public Resource Codes and NERC requirements.

PacifiCorp sequences local transmission lines to be inspected, while considering factors including line location (e.g., located within HFTD and HFRA), when last scheduled work took place, knowledge of tree conditions, predominant species/growth rate, environmental factors (e.g., weather conditions impacting access or ability to perform work), and other influencing factors. Inspections are generally ground based. Where aerial inspections take place, they are generally followed up with ground inspections to confirm conditions identified during aerial inspection.

The IE notes that Section 8.2.2.2 of the **2025 WMP** seems to mistakenly label this initiative as VM-06.

The **2025 WMP** identified an annual target of 270 line-miles and the **2025 Q4 QDR** indicated that 270 line-miles were inspected in 2025, meeting the target.

To validate the 270 line-miles reported, the IE requested supporting documentation, such as a list demonstrating tracking of inspections, in *DR 3*. In response, PacifiCorp provided evidence document **CA_Miles_Units_2025.xlsx**, which contained a list of the 10 lines inspected and the length and dates of inspection for each. These lines totaled 270.8 miles.

Since detailed transmission inspections are tracked at the line level, the IE requested work releases documenting inspection of each line in *DR 7*. In response, PacifiCorp provided PDF copies of contractor work releases for each of the 10 lines.

The IE examined each PDF to ensure that it contained the appropriate code for detailed transmission inspections (“TNT” or “MGI”), or otherwise indicated that an inspection was conducted, covered the line’s full length consistent with the tracking document, and included a signature attesting to the inspection’s completion in 2025. In three cases, the inspection was completed in late 2024. PacifiCorp explained that its inspection year runs from October to October, meaning that Q4 2024 inspections on circuits or lines planned for vegetation maintenance in 2025 are tracked as part of the 2025 work plan. This is consistent with the **2025 Q4 QDR**, which states that the 270 line-miles of 2025 VM-02 inspections were complete by the end of Q3.

Based on this explanation, the IE verified that all 2025 inspections reported were completed prior to October 2025 and identified two lines that were not, at least based on the work release dates, which indicated completion in October 2025 and January 2026. However, the evidence document **CA_Miles_Units_2025.xlsx** indicated that these

circuits were completed in February and March 2025. Based on discussions with PacifiCorp, this discrepancy may be due to contractor delays in returning signed work releases. Additionally, the IE reviewed work releases demonstrating that the work identified on these two lines was completed by the end of 2025.

Due to an older format, three work releases did not list the line distance at all or explicitly state that contractors were to inspect the whole line. In these cases, the IE had to rely on the following attestation provided by PacifiCorp to conclude that the full line distance was inspected:

“PacifiCorp provides the following as an attestation that in cases in which the work release does not indicate the length of the line, a signed work release indicates inspection of the full length of the line as reported in the weekly unit tracker was completed.

We have discontinued use of the prior work release form that did not include line mileage and have transitioned to the current version. Under the prior form, vendors were responsible for completing work on the full assigned circuit. Completion is verified through PacifiCorp’s QA/QC audit program, which documents the total miles inspected for the line.”

Finding

The initiative has an IE Finding of “Initiative Validated” with an IVR of 100%.

Based on the desktop review of the evidence provided, the IE has reasonable assurance that PacifiCorp conducted 270 line-miles of detailed transmission inspections in 2025 and Q4 of 2024, consistent with its **2025 WMP** target, and that although two lines may have been inspected in Q4 of 2025, after the target window, the identified work on these circuits was still resolved in 2025.

5.2.3.2 Funding Verification

PacifiCorp’s **2025 EC AIR** provided a projected budget of \$87 (\$ thousand) and an actual budget of \$112 (\$ thousand) for an absolute percent difference of 29%. PacifiCorp’s variance explanation was as follows:

*“PacifiCorp’s 2025 actual expenditure for VM-02 (Detailed Inspection – Transmission) exceeded the planned budget due to expanded inspection requirements resulting from the establishment of the HFRA. As documented in the **2025 WMP Update**, PacifiCorp’s implementation of the FireSight risk model identified new HFRA mileage that must be inspected to the same standards as CPUC Tier 2 and Tier 3 HFTD areas, increasing the total inspection scope beyond what was assumed in the 2023–2025 Base WMP.”*

Additionally, PacifiCorp's **2025 EOY** provided a territory OPEX and HFTD OPEX actual value expenditure for VM-01, VM-02, VM-03, and VM-04 of \$1396 (\$ thousand) and \$950 (\$ thousand) respectively.

5.2.4 Patrol Inspection – Distribution (VM-03)

5.2.4.1 Initiative Review

Section 8.2.2.3 of PacifiCorp's **2025 WMP** describes the company's annual vegetation patrol inspections of distribution lines, which are generally conducted on distribution lines that are off cycle and of those lines where the detailed inspection is not completed prior to the height of the fire season.

The objective of patrol inspections of distribution lines is to minimize vegetation-related reliability, safety, and wildfire ignition risks by addressing vegetation conditions that require corrective action prior to the next scheduled work (e.g., trees that may have become hazard trees over the course of the past year and trees that have or likely to violate minimum clearance distances before the end of the current growing season). Patrol inspections are generally ground inspections.

The **2025 WMP** identified an annual target of 1,182 line-miles and the **2025 Q4 QDR** indicated that 1,182 line-miles were inspected in 2025, meeting the target.

To validate the 1,182 line-miles reported, the IE requested supporting documentation, such as a list demonstrating tracking of inspections, in *DR 3*. In response, PacifiCorp provided evidence document **CA_Miles_Units_2025.xlsx**, which contained a list of the 42 circuits inspected and the length and dates of inspection for each. These circuits totaled 1,182 line-miles.

Since distribution patrol inspections are tracked at the circuit level, the IE requested work releases documenting inspection of each circuit in *DR 7*. In response, PacifiCorp provided PDF copies of contractor work releases for all 42 circuits. The IE examined each PDF to ensure that it contained the appropriate code for distribution patrol inspections ("FIN"), covered the full length of the circuit consistent with the tracking document, and had a signature attesting to the inspection's completion in 2025.

In some cases, inspections were completed in late 2024. PacifiCorp explained that its inspection year runs from October to October, meaning that Q4 2024 inspections on circuits or lines planned for vegetation maintenance in 2025 are tracked as part of the 2025 work plan. This is consistent with the **2025 Q4 QDR**, which states that the 1,182 line-miles of 2025 VM-03 inspections were complete by the end of Q3. Based on this explanation, the IE then verified that all 2025 inspections reported were completed prior to October 2025 according to the work releases.

In one case, a work release had a scheduled distance five miles shorter than the length of the line according to evidence document **CA_Miles_Units_2025.xlsx**. In discussions with PacifiCorp and review of the weekly progress entries in

CA_Miles_Units_2025.xlsx, the IE was able to conclude that this was a clerical error on the work release and that the full line was inspected.

Finding

The initiative has an IE Finding of “Initiative Validated” with an IVR of 100%.

Based on the desktop review of the evidence provided, the IE has reasonable assurance that PacifiCorp met its **2025 WMP** target of 1,182 line-miles of distribution patrol inspections between October 2024 and September 2025.

5.2.4.2 Funding Verification

PacifiCorp’s **2025 EC AIR** provided a projected budget of \$285 (\$ thousand) and an actual budget of \$469 (\$ thousand) for an absolute percent difference of 65%. PacifiCorp’s variance explanation was as follows:

“PacifiCorp’s 2025 actual expenditure for VM-03 (Patrol Inspection – Distribution) exceeded the planned budget due to an increase in required inspection mileage following the establishment of the HFRA. The implementation of the FireSight risk model identified new HFRA mileage that must be patrolled to the same standards as CPUC Tier 2 and Tier 3 HFTD areas, increasing required patrol coverage beyond the assumptions in the 2023–2025 Base WMP.

Additionally, inspection mileage exceeded the forecast, increasing from 922 planned miles to 1,183 miles, driving higher unit costs, further contributing to the variance. As a result, actual 2025 expenditures were higher than planned.”

Additionally, PacifiCorp’s **2025 EOY** provided a territory OPEX and HFTD OPEX actual value expenditure for VM-01, VM-02, VM-03, and VM-04 of \$1396 (\$ thousand) and \$950 (\$ thousand) respectively.

5.2.5 Patrol Inspection – Transmission (VM-04)

5.2.5.1 Initiative Review

Section 8.2.2.4 of PacifiCorp’s **2025 WMP** describes the company’s annual vegetation patrol inspections of transmission lines, which are generally conducted on transmission lines that are not scheduled for detail inspection.

The objective of patrol inspections of transmission lines is to minimize vegetation-related reliability, safety, and wildfire ignition risks by addressing vegetation conditions that require corrective action prior to the next scheduled work (e.g., trees that may have become hazard trees over the course of the past year and trees that have or are likely to violate minimum clearance distances before the end of the current growing season). Patrol inspections are generally ground inspections but may be augmented with aerial inspections.

The **2025 WMP** identified an annual target of 417 line-miles and the **2025 Q4 QDR** indicated that 417 line-miles were inspected in 2025, meeting the target.

To validate the 417 line-miles reported, the IE requested supporting documentation, such as a list demonstrating tracking of inspections, in *DR 3*. In response, PacifiCorp provided evidence document **CA_Miles_Units_2025.xlsx**, which contained a list of the 11 lines inspected and the length and dates of inspection for each. These lines totaled 417 line-miles.

Since transmission patrol inspections are tracked at the line level, the IE requested work releases documenting inspection of each line in *DR 7*. In response, PacifiCorp provided PDF copies of contractor work releases for 10 of 11 lines (for the 11th line, measuring less than 0.1 mile, PacifiCorp provided a forester audit form indicating no work was required).

The IE examined each of the 10 work release PDFs to ensure that it contained the appropriate code for distribution patrol inspections (“FIT”), covered the full length of the line consistent with the tracking document, and had a signature attesting to the inspection’s completion in 2025.

In some cases, inspections were completed in late 2024. PacifiCorp explained that its inspection year runs from October to October, meaning that Q4 2024 inspections on circuits or lines planned for vegetation maintenance in 2025 are tracked as part of the 2025 work plan. This is consistent with the **2025 Q4 QDR**, which states that the 417 line-miles of 2025 VM-04 inspections were complete by the end of Q3. Based on this explanation, the IE verified that all 2025 inspections reported were completed prior to October 2025 according to the work releases.

Due to an older format, three work releases did not list the line distance at all or explicitly state that contractors were to inspect the whole line. In these cases, the IE had to rely on the following attestation provided by PacifiCorp to conclude that the full line distance was inspected:

“PacifiCorp provides the following as an attestation that in cases in which the work release does not indicate the length of the line, a signed work release indicates inspection of the full length of the line as reported in the weekly unit tracker was completed.

We have discontinued use of the prior work release form that did not include line mileage and have transitioned to the current version. Under the prior form, vendors were responsible for completing work on the full assigned circuit. Completion is verified through PacifiCorp’s QA/QC audit program, which documents the total miles inspected for the line.”

Additionally, for two lines, PacifiCorp provided two signed work releases per line, each of which suggested the full distance of the line was completed and did not include any

explanatory notes. The IE inquired about this, and PacifiCorp explained that for each of these lines, the work was split between two contractors. The IE noted that signed work releases suggesting a contractor inspected the full length of the line, when that contractor only completed part of the inspection, generally degrade the value of signed work releases as evidence of inspection completion. PacifiCorp stated that it would add a “Notes” field to the work release form so that contractors could indicate when they only inspected a fraction of the distance on the work release.

Finding

The initiative has an IE Finding of “Initiative Validated” with an IVR of 100%.

Based on the desktop review of the evidence provided, the IE has reasonable assurance that PacifiCorp met its **2025 WMP** target of 417 line-miles of transmission patrol inspections between October 2024 and September 2025.

5.2.5.2 Funding Verification

PacifiCorp’s **2025 EC AIR** provided a projected budget of \$102 (\$ thousand) and an actual budget of \$84 (\$ thousand) for an absolute percent difference of 18%. PacifiCorp’s variance explanation was as follows:

*“PacifiCorp’s 2025 actual expenditure for VM-04 (Patrol Inspection – Transmission) differed from the planned budget due to changes in inspection mileage requirements following the establishment of the HFRA. As reflected in the **2025 WMP Update**, the implementation of the FireSight risk model identified additional HFRA transmission mileage that must be patrolled annually using the same standards as CPUC Tier 2 and Tier 3 HFTD areas, expanding the scope of required work beyond the assumptions in the 2023–2025 Base WMP.*

In practice, inspection volume increased from an expected 329-line miles to 417-line miles, reflecting an increase in required coverage. While the cost per mile decreased due to efficiencies in execution, the total inspection requirement exceeded the originally planned volumes, contributing to the variance from budget assumptions.”

Additionally, PacifiCorp’s **2025 EOY** provided a territory OPEX and HFTD OPEX actual value expenditure for VM-01, VM-02, VM-03, and VM-04 of \$1396 (\$ thousand) and \$950 (\$ thousand) respectively.

5.2.6 Pole Clearing (VM-05)

5.2.6.1 Initiative Review

According to Section 8.2.3.1.2 of PacifiCorp’s **2025 WMP**, consistent with California Public Resource Code (PRC) § 4292, PacifiCorp conducts pole clearing activities involving removal of vegetation within a 10’ radius measured from the outer

circumference of the specified pole. Flammable vegetation and materials located wholly or partially within the firebreak space are treated as follows:

- **At ground level:** Remove flammable materials.
- **From 0-8 feet above ground level:** Remove flammable trash, debris or other materials, grass, herbaceous and brush vegetation, and limbs and foliage of living trees up to a height of 8 feet.
- **From 8 feet to horizontal plane of highest point of conductor attachment:** Remove dead, diseased or dying limbs and foliage from living sound trees and dead, diseased, or dying trees.

According to the **2025 WMP**, PacifiCorp has expanded pole clearing to include Local Responsibility Area (LRA) subject equipment poles located in the HFTD in addition to its existing program in compliance with regulations of clearing State Responsibility Area (SRA) subject poles. In addition to state-required pole clearing activities, PacifiCorp addresses vegetation adjacent to “subject” poles in LRAs to further reduce wildfire ignition risks and increase wildfire resiliency.

The **2025 WMP** identified an annual target of 3,126 poles cleared within HFTD LRAs and the **2025 Q4 QDR** indicated that 3,126 poles were cleared in 2025, meeting the target.

To validate the reported 3,126 poles cleared, the IE conducted both a desktop review and field verification. As part of *DR 3*, the IE requested a complete list of all pole clearings performed in 2025. In response, PacifiCorp provided two Excel files and an explanation that “summing the exempt poles identified within **PpNotificationPoleClearing_2025_LRA.xlsx** with the poles cleared as identified in **PpPoleTreatmentDetail_2025_LRA.xlsx** presents the total subject poles inspected and/or worked to achieve the initiative target. Initiative target is based on poles inspected and identified as exempt plus poles worked.”

The IE notes that based on this explanation, the target and reported progress of 3,126 poles is misleading. In the absence of further explanation, which is not provided in the **2025 WMP**, the implication is that 3,126 poles were cleared, but the target and progress include poles that were not cleared because they were deemed exempt (in most cases because they consisted of non-expulsive equipment).

Despite PacifiCorp’s explanation in *DR 3*, the IE mistakenly sampled from the file that included the exempt poles. As a result, neither the desktop nor field verification conducted can be relied upon for reasonable assurance of PacifiCorp’s completion of its target, which is not poles cleared, but rather poles cleared *or deemed exempt*.

However, in the process of field-verifying the exempt poles, the IE did note that some poles seemed to be classified as exempt when they should not have been, and/or for

the wrong reason. For example, one pole was classified as exempt because of a swamp landscape, but is located in an urban weed landscape. Another pole was listed as exempt because of a “hardscape,” but it is located within a grassland. Although the field-verification process was not successfully carried out as intended, these data quality issues do raise concerns about whether the pole-clearing program is being implemented effectively by identifying the correct poles to clear.

Finding

The initiative has an IE Finding of “Validation Inconclusive”.

As a result of the confusing reporting system for VM-05, combined with an IE error in interpreting the VM-05 data when sampling, the IE cannot reach a conclusion on whether PacifiCorp completed the number of pole clearings it targeted in 2025. However, the IE can conclude that PacifiCorp did not conduct 3,126 pole clearings, since that target includes both poles inspected and those deemed exempt from clearing. Additionally, the IE did identify apparent errors in the exemption classifications of several poles reviewed in the field, which raise concerns about the effectiveness of the pole-clearing program in identifying the correct poles to clear.

5.2.6.2 Funding Verification

PacifiCorp’s **2025 EC AIR** provided a projected budget of \$530 (\$ thousand) and an actual budget of \$731 (\$ thousand) for an absolute percent difference of 38%. PacifiCorp’s variance explanation was as follows:

*“PacifiCorp’s 2025 actual expenditure for VM-05 (Pole Clearing) exceeded the planned budget due to increased clearing requirements following the establishment of the HFRA. As described in the **2025 WMP Update**, the FireSight risk model identified substantial new HFRA acreage that must be managed to the same standards as CPUC Tier 2 and Tier 3 HFTD areas, expanding the total number of poles requiring clearing relative to the assumptions used in the 2023–2025 Base WMP.*

This expansion required pole clearing across a greater number of miles than originally forecast. Actual 2025 workload increased from an expected 3,014 miles to 3,192 miles, and the cost-per-mile also increased, contributing to higher-than-planned expenditures.”

Additionally, PacifiCorp’s **2025 EOY** provided a territory OPEX and HFTD OPEX actual value expenditure for VM-05 of \$731 (\$ thousand) and \$709 (\$ thousand) respectively.

5.2.7 Clearance – Distribution (VM-06)

5.2.7.1 Initiative Review

Section 8.2.3.2 of PacifiCorp’s **2025 WMP** describes how the company conducts cycle-based maintenance coupled with annual patrol and corrective maintenance (incremental to routine maintenance) to maintain required minimum clearance distances as identified in Table 1 of GO 95. The IE notes that Section 8.2.2.1 of the **2025 WMP** seems to mistakenly state that this clearance is tracked under VM-02 rather than VM-06.

While this initiative did have a budgeted spend for 2025, which was recorded in the **2025 EOY** and was corroborated via the **2025 EC AIR**, it did not have a quantitative or qualitative target for the same period. As such, the IE did not perform a detailed review of the initiative as part of the 2025 Independent Evaluation.

5.2.7.2 Funding Verification

PacifiCorp’s **2025 EC AIR** provided a projected budget of \$12,770 (\$ thousand) and an actual budget of \$13,467 (\$ thousand) for an absolute percent difference of 5%.

Additionally, PacifiCorp’s **2025 EOY** provided a territory OPEX and HFTD OPEX actual value expenditure for VM-06, VM-07, and VM-08 of \$16,191 (\$ thousand) and \$11,025 (\$ thousand) respectively.

5.2.8 Clearance – Transmission (VM-07)

5.2.8.1 Initiative Review

Section 8.2.3.2 of PacifiCorp’s **2025 WMP** describes how the company conducts cycle-based maintenance coupled with annual patrol and corrective maintenance (incremental to routine maintenance) to maintain required minimum clearance distances as identified in Table 1 of GO 95.

While this initiative did have a budgeted spend for 2025, which was recorded in the **2025 EOY** and was corroborated via the **2025 EC AIR**, it did not have a quantitative or qualitative target for the same period. As such, the IE did not perform a detailed review of the initiative as part of the 2025 Independent Evaluation.

5.2.8.2 Funding Verification

PacifiCorp’s **2025 EC AIR** provided a projected budget of \$2,520 (\$ thousand) and an actual budget of \$2,724 (\$ thousand) for an absolute percent difference of 5%.

Additionally, PacifiCorp’s **2025 EOY** provided a territory OPEX and HFTD OPEX actual value expenditure for VM-06, VM-07, and VM-08 of \$16,191 (\$ thousand) and \$11,025 (\$ thousand) respectively.

5.2.9 Fall-in Mitigation (VM-08)

5.2.9.1 Initiative Review

Section 8.2.3.3 of PacifiCorp's **2025 WMP** indicates that failure of limbs or branches overhanging electrical conductors pose a fall-in risk and that increased overhang clearances may decrease this mode of fall-in risk. The Enhanced Overhang Reduction Pilot aims to determine the effects of this activity on tree species and reduce the amount of vegetation overhanging high-voltage power lines, thereby decreasing ignition potential from vegetation and conductor contact.

While this initiative did have a budgeted spend for 2025, which was recorded in the **2025 EOY** and was corroborated via the **2025 EC AIR**, it did not have a quantitative or qualitative target for the same period. As such, the IE did not perform a detailed review of the initiative as part of the 2025 Independent Evaluation.

5.2.9.2 Funding Verification

PacifiCorp's **2025 EC AIR** provided a projected budget of \$40 (\$ thousand) and an actual budget of \$0 (\$ thousand) for an absolute percent difference of 100%. PacifiCorp's variance explanation was as follows:

"PacifiCorp's 2025 actual expenditure for VM-08 (Fall-in Mitigation) was lower than planned because the underlying fieldwork associated with the Enhanced Overhang Reduction pilot was discontinued prior to the start of the 2025 implementation period. Although funding was carried forward into 2025 in case additional fieldwork verification was required, no field activities were needed and the remaining evaluation consisted only of desktop review and internal discussions. As a result, no fieldwork occurred and no expenditures were incurred under this initiative in 2025."

Additionally, PacifiCorp's **2025 EOY** provided a territory OPEX and HFTD OPEX actual value expenditure for VM-06, VM-07, and VM-08 of \$16,191 (\$ thousand) and \$11,025 (\$ thousand) respectively.

5.2.10 Quality Assurance / Quality Control – Post-Audit (VM-11)

5.2.10.1 Initiative Review

Section 8.2.5 of PacifiCorp's **2025 WMP** describes how PacifiCorp conducts post-audits (quality control reviews) to compare completed vegetation management work against specifications. Post-audits are completed annually, primarily by PacifiCorp internal staff, and include review of routine maintenance (work identified during detailed inspections) and additional work completed annually within the HFTD (work identified during patrol inspections).

PacifiCorp's **2025 WMP** set post-audit targets for patrol inspections of both transmission and distribution lines in 2025. Progress toward these targets was reported in the **2025 Q4 QDR** and the IE verified this progress as described in the two following sections.

Post-Audit of Transmission Inspections

PacifiCorp's **2025 WMP** identified a post-audit target of 417 line-miles for patrol inspections of transmission lines. PacifiCorp's **2025 Q4 QDR** reported that actual post-audits of patrol inspections covered 417 line-miles in 2025, meeting the 2025 target.

To validate the 417 line-miles reported, the IE requested supporting documentation to demonstrate completion of the post-audits in *DR 3*. In response, PacifiCorp provided evidence document **CA_Master_Post Audit Tracker_2025.xlsm**, which contained a list of the 11 lines with vegetation work to be inspected and the length of each. These lines totaled 417 line-miles.

Since post-audits of patrol inspections are tracked at the line level, the IE requested documentation of each line's inspection by a PacifiCorp forester in *DR 4*. In response, PacifiCorp provided forester audit forms for each of the 11 lines audited.

The IE reviewed each of these forester audit forms to verify that it audited the correct type of vegetation work ("FMT"), that it covered all the line-miles reported for the line in the tracking document, that it was completed in 2025, and that it was signed.

Finding

The initiative has an IE Finding of "Initiative Validated" with an IVR of 100%.

Based on the desktop review of the evidence provided, the IE has reasonable assurance that PacifiCorp completed post-audits of 417 line-miles of patrol inspections of transmission lines in 2025, meeting the target of 417 line-miles in the **2025 WMP**.

Post-Audit of Distribution Inspections

PacifiCorp's **2025 WMP** identified a post-audit target of 1,182 line-miles for patrol inspections of distribution lines. PacifiCorp's **2025 Q4 QDR** reported that actual post-audits of patrol inspections covered 1,182 line-miles in 2025, meeting the 2025 target.

To validate the 1,182 line-miles reported, the IE requested supporting documentation to demonstrate completion of the post-audits in *DR 3*. In response, PacifiCorp provided evidence document **CA_Master_Post Audit Tracker_2025.xlsm**, which contained a list of the 42 circuits with vegetation work to be inspected and the length of each. These circuits totaled 1,182 line-miles.

Since post-audits of patrol inspections are tracked at the circuit level, the IE requested documentation of each circuit's inspection by a PacifiCorp forester in *DR 4*. In response, PacifiCorp provided forester audit forms for each of the 42 circuits audited.

The IE reviewed each of these forester audit forms to verify that it audited the correct type of vegetation work (“FMD”), that it covered all the line-miles reported for the circuit in the tracking document, that it was completed in 2025, and that it was signed.

In three cases, the distance on the form either was not provided or did not match the circuit length reported in **CA_Master_Post Audit Tracker_2025.xlsm**, but the form noted 100% review of the circuit and the IE concluded that the discrepancies were clerical errors on the audit forms.

Finding

The initiative has an IE Finding of “Initiative Validated” with an IVR of 100%.

Based on the desktop review of the evidence provided, the IE has reasonable assurance that PacifiCorp completed post-audits of 1,182 line-miles of patrol inspections of distribution lines in 2025, meeting the target of 1,182 line-miles in the **2025 WMP**.

5.2.10.2 Funding Verification

PacifiCorp’s **2025 EC AIR** provided a projected budget of \$165 (\$ thousand) and an actual budget of \$223 (\$ thousand) for an absolute percent difference of 35%. PacifiCorp’s variance explanation was as follows:

*“PacifiCorp’s 2025 actual expenditure for VM-11 (Quality Assurance/ Quality Control) exceeded the planned budget due to an increase in required QA/QC activities associated with expanded inspection scope in the HFRA. Following implementation of the FireSight risk model, the **2025 WMP Update** established new HFRA territory that must be inspected and audited to the same standards as CPUC Tier 2 and Tier 3 HFTD areas, which increased the volume of vegetation inspections subject to QA/QC review.*

As a result, higher audit volumes and more extensive verification requirements led to increased costs beyond what was originally forecast for 2025.”

Additionally, PacifiCorp’s **2025 EOY** provided a territory OPEX and HFTD OPEX actual value expenditure for VM-11 of \$223 (\$ thousand) and \$223 (\$ thousand) respectively.

5.2.11 Synthesis of Findings

5.2.11.1 Initiative Review

As in the **2024 WMP IE ARC**, the IE did not perform initiative reviews for VM-06 and VM-07 in the absence of specific targets. For 2025, VM-08 also did not have a target to evaluate.

For VM-05, although the initiative had a field-verifiable target, a confusing target and reporting system contributed to an IE sampling error, which resulted in an inability to conclude whether PacifiCorp met its target. The IE recommends that going forward, PacifiCorp revise its VM-05 target to clarify that it refers to poles cleared *or inspected and deemed exempt*. Regardless, it would not be accurate to say that PacifiCorp cleared 3,126 poles in 2025, as the **2025 WMP** and **2025 Q4 QDR** suggest. Additionally, the IE did identify in the field several apparent errors in the exemption classifications for poles, which raises concerns about the identification process for pole clearing.

With respect to VM-01, VM-02, VM-03, and VM-04, as in the **2024 WMP IE ARC**, the IE has reasonable assurance of PacifiCorp's completion of the inspection targets for 2025. However, reaching this point was complicated by data quality and recordkeeping issues described below, most of which carry over from the **2024 WMP IE ARC**.

One note is that although the numbers are the same across the **2025 WMP** and the **2025 Q4 QDR**, the unit in the **2025 WMP** for some vegetation management and inspection targets is circuit-miles whereas all targets in the **2025 Q4 QDR** are expressed in line-miles. For the purposes of the evaluation, the IE considered these units to be equivalent since the associated numbers were identical, but the IE notes that this difference in units is confusing and potentially inaccurate.

As noted in the individual reviews, an issue across initiatives was discrepancies between the line/circuit lengths on work releases, tracking spreadsheets, and the **2025 Q4 QDR**. This created confusion during the validation of completed activities. PacifiCorp reported to the IE that it is actively working on improving its processes to avoid these conflicting records, which may arise due to changes to GIS data between the points when figures are drawn from that data.

The IE encountered additional data quality issues with the work releases, particularly related to incorrect completion dates and absent or incorrect information about the distance inspected or total line distance. Despite clarifications provided by PacifiCorp that gave the IE reasonable assurance of target completion, these issues generally degrade the value of signed work releases as evidence of inspection completion. Overall, these issues suggest a need for greater attention by PacifiCorp to ensuring that work releases are returned by contractors in a timely manner and checked for complete, accurate, and clear information before filing.

As a final note, the IE observes that PacifiCorp's quarterly targets for VM-01, VM-02, VM-03, and VM-04 in the **2025 WMP** do not reflect that the inspection year begins with Q4 of the previous year and that the target for the target year should be met by the end of Q3. The IE recommends that PacifiCorp revise its quarterly targeting process for these initiatives to reflect the reality of how inspections are tracked as part of the annual work plan.

5.2.11.2 Funding Verification

Initiative ID	Initiative	Planned Spend (\$ Thousands)	Actual Spend (\$ Thousands)	Variance	Variance Description ³⁰
VM-01	Detailed Inspection – Distribution	\$310	\$731	136%	PacifiCorp’s 2025 actual expenditure for VM-01 (Detailed Inspection – Distribution) exceeded the planned budget primarily due to an increase in required inspection volume following the establishment of the HFRA. As documented in the 2025 WMP Update , PacifiCorp implemented the FireSight risk model and identified 728 miles of new HFRA territory, which must be inspected to the same standards as CPUC Tier 2 and Tier 3 HFTD areas. This operational change resulted in higher inspection volumes than assumed in the 2023–2025 Base WMP. As a result, the actual 2025 expenditures exceeded the planned budget.
VM-02	Detailed Inspection – Transmission	\$87	\$112	29%	PacifiCorp’s 2025 actual expenditure for VM-02 (Detailed Inspection – Transmission) exceeded the planned budget due to expanded inspection requirements resulting from the establishment of the HFRA. As documented in the 2025 WMP Update , PacifiCorp’s implementation of the FireSight risk model identified new HFRA mileage that must be inspected to the same standards as CPUC Tier 2 and Tier 3 HFTD areas, increasing the total inspection scope beyond what was assumed in the 2023–2025 Base WMP.

³⁰ The Office of Energy Infrastructure Safety does not require variance descriptions for absolute variances less than 10%.

Initiative ID	Initiative	Planned Spend (\$ Thousands)	Actual Spend (\$ Thousands)	Variance	Variance Description ³⁰
VM-03	Patrol Inspection – Distribution	\$285	\$469	65%	PacifiCorp’s 2025 actual expenditure for VM-03 (Patrol Inspection – Distribution) exceeded the planned budget due to an increase in required inspection mileage following the establishment of the HFRA. The implementation of the FireSight risk model identified new HFRA mileage that must be patrolled to the same standards as CPUC Tier 2 and Tier 3 HFTD areas, increasing required patrol coverage beyond the assumptions in the 2023–2025 Base WMP. Additionally, inspection mileage exceeded the forecast, increasing from 922 planned miles to 1,183 miles, driving higher unit costs, further contributing to the variance. As a result, actual 2025 expenditures were higher than planned.

Initiative ID	Initiative	Planned Spend (\$ Thousands)	Actual Spend (\$ Thousands)	Variance	Variance Description ³⁰
VM-04	Patrol Inspection – Transmission	\$102	\$84	-18%	“PacifiCorp’s 2025 actual expenditure for VM-04 (Patrol Inspection – Transmission) differed from the planned budget due to changes in inspection mileage requirements following the establishment of the HFRA. As reflected in the 2025 WMP Update, the implementation of the FireSight risk model identified additional HFRA transmission mileage that must be patrolled annually using the same standards as CPUC Tier 2 and Tier 3 HFTD areas, expanding the scope of required work beyond the assumptions in the 2023–2025 Base WMP. In practice, inspection volume increased from an expected 329-line miles to 417-line miles, reflecting an increase in required coverage. While the cost per mile decreased due to efficiencies in execution, the total inspection requirement exceeded the originally planned volumes, contributing to the variance from budget assumptions.

Initiative ID	Initiative	Planned Spend (\$ Thousands)	Actual Spend (\$ Thousands)	Variance	Variance Description ³⁰
VM-05	Pole Clearing	\$530	\$731	38%	PacifiCorp's 2025 actual expenditure for VM-05 (Pole Clearing) exceeded the planned budget due to increased clearing requirements following the establishment of the HFRA. As described in the 2025 WMP Update, the FireSight risk model identified substantial new HFRA acreage that must be managed to the same standards as CPUC Tier 2 and Tier 3 HFTD areas, expanding the total number of poles requiring clearing relative to the assumptions used in the 2023–2025 Base WMP. This expansion required pole clearing across a greater number of miles than originally forecast. Actual 2025 workload increased from an expected 3,014 miles to 3,192 miles, and the cost-pe-mile also increased, contributing to higher-than-planned expenditures.
VM-06	Clearance – Distribution	\$12,770	\$13,467	5%	N/A
VM-07	Clearance – Transmission	\$2,520	\$2,724	5%	N/A

Initiative ID	Initiative	Planned Spend (\$ Thousands)	Actual Spend (\$ Thousands)	Variance	Variance Description ³⁰
VM-08	Fall-in Mitigation	\$40	\$0	-100%	PacifiCorp's 2025 actual expenditure for VM-08 (Fall-in Mitigation) was lower than planned because the underlying fieldwork associated with the Enhanced Overhang Reduction pilot was discontinued prior to the start of the 2025 implementation period. Although funding was carried forward into 2025 in case additional fieldwork verification was required, no field activities were needed and the remaining evaluation consisted only of desktop review and internal discussions. As a result, no fieldwork occurred and no expenditures were incurred under this initiative in 2025.
VM-11	Quality Assurance/ Quality Control	\$165	\$223	35%	PacifiCorp's 2025 actual expenditure for VM-11 (Quality Assurance/ Quality Control) exceeded the planned budget due to an increase in required QA/QC activities associated with expanded inspection scope in the HFRA. Following implementation of the FireSight risk model, the 2025 WMP Update established new HFRA territory that must be inspected and audited to the same standards as CPUC Tier 2 and Tier 3 HFTD areas, which increased the volume of vegetation inspections subject to QA/QC review. As a result, higher audit volumes and more extensive verification requirements led to increased costs beyond what was originally forecast for 2025.

5.3 Situational Awareness and Forecasting

5.3.1 Summary Table

Initiative Number, WMP Section, and Name	WMP - Initiative Target	EC-Claimed Progress	EC- Claimed Initiative Status	Sample Size	Sample Validation Rate	Verification Method	IE Finding on Initiative [Initiative Validation Rate ³¹]	WMP - Planned Spend (Thousands \$)	EC-Claimed Actual Spend (Thousands \$) [Variance]	Satisfied Risk Reduction Goal - Finding ³²
SA-01 8.3.2.1 Environmental Monitoring Systems	6 Weather Stations	8 Weather Stations	Target Met	8 Weather Stations	100%	Desktop	133%	\$120	\$141 [18%]	N/A
SA-02 8.3.3.1 Grid Monitoring Systems	No Target	Not Reported	Not Reported	Sampling Not Utilized	Sampling Not Utilized	Desktop	Detailed Initiative Review Not Performed	\$0	\$34 [N/A]	N/A
SA-03 8.3.4.1 Smoke and Air Quality Sensors	No Target	Not Reported	Not Reported	Sampling Not Utilized	Sampling Not Utilized	Desktop	Detailed Initiative Review Not Performed	\$0	\$0 [0%]	N/A
SA-04 8.3.4.1 Ignition Detection Systems	No Target	Not Reported	Not Reported	Sampling Not Utilized	Sampling Not Utilized	Desktop	Detailed Initiative Review Not Performed	\$80	\$80 [0%]	N/A
SA-05 8.3.5.3 Weather Forecasting	No Target	Not Reported	Not Reported	Sampling Not Utilized	Sampling Not Utilized	Desktop	Detailed Initiative Review Not Performed	\$670	\$165 [-71%]	N/A

³¹ Initiative Validation Rate is equal to the Sample Validation Rate times the EC-Claimed Progress and then divided by the WMP-Initiative Target.

³² PacifiCorp did not capture risk reduction goals in its **2025 WMP**. Thus, the IE could not validate if a goal was met.

Initiative Number, WMP Section, and Name	WMP - Initiative Target	EC-Claimed Progress	EC-Claimed Initiative Status	Sample Size	Sample Validation Rate	Verification Method	IE Finding on Initiative [Initiative Validation Rate ³¹]	WMP - Planned Spend (Thousands \$)	EC-Claimed Actual Spend (Thousands \$) [Variance]	Satisfied Risk Reduction Goal - Finding ³²
SA-06 8.3.6.1 Fire Potential Index	No Target	Not Reported	Not Reported	Sampling Not Utilized	Sampling Not Utilized	Desktop	Detailed Initiative Review Not Performed	\$96	\$996 [938%]	N/A

5.3.2 Environmental Monitoring Systems (SA-01)

5.3.2.1 Initiative Review

Section 8.3.2.1 of PacifiCorp’s **2025 WMP** describes the company’s network of weather stations, which provide 10-minute observations of temperature, humidity, wind speed, wind direction, and wind gusts. Weather stations are calibrated annually before wildfire season to ensure accurate data.

The **2025 WMP** identified an annual target of six weather stations installed and the **2025 Q4 QDR** reported that eight were installed in 2025.

To confirm that eight weather stations were installed, the IE requested a full population list of the stations listed by unique identifier in *DR 3*. In response, PacifiCorp provided a list of the eight stations with unique identifiers in evidence document Item 16 **weather stations.xlsx**.

The IE then requested evidence for all eight weather stations in *DR 4* to further verify that they were installed. In response, PacifiCorp provided a completed calibration maintenance worksheet for all eight weather stations. Each worksheet included a date/time stamp, an installation checklist, and images of the installed units. Based on the PDF reports, the IE was able to verify that eight weather stations were installed in 2025.

Finding

The initiative has an IE Finding of “Initiative Validated” with an IVR of 133%.

Based on the desktop review of the evidence provided, the IE has reasonable assurance that PacifiCorp exceeded its **2025 WMP** target of six weather station installations in 2025 by performing eight installations in 2025.

5.3.2.2 Funding Verification

PacifiCorp’s **2025 EC AIR** provided a projected budget of \$120 (\$ thousand) and an actual budget of \$141 (\$ thousand) for an absolute percent difference of 18%. PacifiCorp’s variance explanation was as follows:

“PacifiCorp’s 2025 actual expenditure for SA-01 (Environmental Monitoring Systems) exceeded the planned budget because the company installed more environmental monitoring stations than originally projected in the 2023–2025 Base WMP. As reflected in the WMP, PacifiCorp adjusts annual installation quantities based on operational needs and situational awareness requirements, and in 2025, additional stations were installed to support wildfire risk monitoring beyond the initial forecast. These added installations resulted in higher costs than the planned budget assumed.”

Additionally, PacifiCorp's **2025 EOY** provided a territory CAPEX and HFTD CAPEX actual value expenditure for MA-01 and SA-01 of \$141 (\$ thousand) and \$106 (\$ thousand) respectively. The EOY also provided a territory OPEX and HFTD OPEX actual value expenditure for MA-01 and SA-01 of \$399 (\$ thousand) and \$219 (\$ thousand) respectively.

5.3.3 Grid Monitoring Systems (SA-02)

5.3.3.1 Initiative Review

Section 8.3.3.1 of PacifiCorp's **2025 WMP** describes the company's piloting of distribution fault anticipator (DFA) technology in partnership with Texas A&M University. DFA devices monitor continuously for high- or low-current fault conditions and provide preemptive alerts over cellular networks to identify equipment along distribution circuits that could cause an outage.

While this initiative did have a budgeted spend for 2025, which was recorded in the **2025 EOY** and was corroborated via the **2025 EC AIR**, it did not have a quantitative or qualitative target for the same period. As such, the IE did not perform a detailed review of the initiative as part of the 2025 Independent Evaluation.

5.3.3.2 Funding Verification

PacifiCorp's **2025 EC AIR** provided a projected budget of \$0 (\$ thousand) and an actual budget of \$34 (\$ thousand). PacifiCorp's variance explanation was as follows:

"PacifiCorp's 2025 actual expenditure for SA-02 (Grid Monitoring Systems) exceeded the planned budget because the initiative continued to incur communication costs associated with existing distribution fault anticipation (DFA) devices through 2025. Although support-service costs were no longer included in this initiative beginning in the 2023–2025 Base WMP, cellular communication charges remained necessary to operate the devices until their service contracts expired. These ongoing communication costs resulted in actual expenditures above the planned budget, which assumed no spending for 2025."

Additionally, PacifiCorp's **2025 EOY** provided a territory OPEX and HFTD PPEX actual value expenditure for SA-02 of \$34 (\$ thousand) and \$34 (\$ thousand) respectively.

5.3.4 Smoke and Air Quality Sensors (SA-03)

5.3.4.1 Initiative Review

Section 8.3.4.1 of PacifiCorp's **2025 WMP** describes PacifiCorp's smoke and air quality sensors program, highlighting that PacifiCorp installed 20 intelligent smoke and particulate sensors in the highest fire risk areas of its northern California service territory. This effort was part of the continued evaluation of the durability and accuracy

of the sensors in support of the Department of Homeland Security's Smart Cities Internet of Things (SCITI) Lab's wildland fire sensor program.

While this initiative did have a budgeted spend for 2025, which was recorded in the **2025 EOY** and was corroborated via the **2025 EC AIR**, it did not have a quantitative or qualitative target for the same period. As such, the IE did not perform a detailed review of the initiative as part of the 2025 Independent Evaluation.

5.3.4.2 Funding Verification

PacifiCorp's **2025 EC AIR** provided a projected budget of \$0 (\$ thousand) and an actual budget of \$0 (\$ thousand) for an absolute percent difference of 0%.

Additionally, PacifiCorp's **2025 EOY** provided a territory OPEX and HFTD PPEX actual value expenditure for SA-03 and SA-04 of \$80 (\$ thousand) and \$50 (\$ thousand) respectively.

5.3.5 Ignition Detection Systems (SA-04)

5.3.5.1 Initiative Review

Section 8.3.4.1 of PacifiCorp's **2025 WMP** describes PacifiCorp's high-definition camera program, specifically the technology within those camera systems and how the installation of additional systems will fill gaps in the existing camera network.

While this initiative did have a budgeted spend for 2025, which was recorded in the **2025 EOY** and was corroborated via the **2025 EC AIR**, it did not have a quantitative or qualitative target for the same period. As such, the IE did not perform a detailed review of the initiative as part of the 2025 Independent Evaluation.

5.3.5.2 Funding Verification

PacifiCorp's **2025 EC AIR** provided a projected budget of \$80 (\$ thousand) and an actual budget of \$80 (\$ thousand) for an absolute percent difference of 0%.

Additionally, PacifiCorp's **2025 EOY** provided a territory OPEX and HFTD PPEX actual value expenditure for SA-03 and SA-04 of \$80 (\$ thousand) and \$50 (\$ thousand) respectively.

5.3.6 Weather Forecasting (SA-05)

5.3.6.1 Initiative Review

Section 8.3.5 of PacifiCorp's **2025 WMP** describes PacifiCorp's systems and procedures used to forecast weather within its service territory. These forecasts play a critical role in mitigating the risk of utility-caused wildfires. By accurately predicting weather conditions and its impact on the grid, electric utilities can proactively take steps to reduce the risk of fire ignition and spread, ensuring public safety. The ability to

gather, interpret, and translate data into an assessment of utility-specific risk and inform decision making is a key component of PacifiCorp’s situational awareness.

While this initiative did have a budgeted spend for 2025, which was recorded in the **2025 EOY** and was corroborated via the **2025 EC AIR**, it did not have a quantitative or qualitative target for the same period. As such, the IE did not perform a detailed review of the initiative as part of the 2025 Independent Evaluation.

5.3.6.2 Funding Verification

PacifiCorp’s **2025 EC AIR** provided a projected budget of \$670 (\$ thousand) and an actual budget of \$195 (\$ thousand) for an absolute percent difference of 71%. PacifiCorp’s variance explanation was as follows:

“PacifiCorp’s 2025 actual expenditure for SA-05 (Weather Forecasting) was lower than the planned budget due to unanticipated Department of Energy (DOE) grant reimbursements and changes in PacifiCorp’s contract with Technosylva. DOE reimbursements applied to more activities than initially expected, reducing net expenditure for the initiative. In addition, Technosylva’s updated contract structure resulted in certain forecasting and modeling costs being invoiced differently than reflected in the planning forecast, contributing to lower actual spending within SA-05.”

Additionally, PacifiCorp’s **2025 EOY** provided a territory CAPEX and HFTD CAPEX actual value expenditure for SA-05 of \$28 (\$ thousand) and \$18 (\$ thousand) respectively. The EOY also provided a territory OPEX and HFTD OPEX actual value expenditure for SA-05 of \$167 (\$ thousand) and \$105 (\$ thousand) respectively.

5.3.7 Fire Potential Index (SA-06)

5.3.7.1 Initiative Review.

Section 8.3.6 of PacifiCorp’s **2025 WMP** describes how PacifiCorp Meteorology assigns a district-level wildfire risk based on an assessment of the Geographic Area Coordination Center’s (GACC) 7-Day Significant Fire Potential product, publicly available fuels information, and weather forecast data. The section also provides references to Section 8.1.8.3 for how the risk assigned may modify operations practices, Section 8.1.8.1 for how the risk assigned may inform modifications to system operations, and Section 9.1.6 for how it is used in assessing the potential for PSPS.

While this initiative did have a budgeted spend for 2025, which was recorded in the **2025 EOY** and was corroborated via the **2025 EC AIR**, it did not have a quantitative or qualitative target for the same period. As such, the IE did not perform a detailed review of the initiative as part of the 2025 Independent Evaluation.

5.3.7.2 Funding Verification

PacifiCorp's **2025 EC AIR** provided a projected budget of \$96 (\$ thousand) and an actual budget of \$996 (\$ thousand) for an absolute percent difference of 938%. PacifiCorp's variance explanation was as follows:

"PacifiCorp's 2025 actual expenditure for SA-06 (Fire Potential Index) exceeded the planned budget due to changes in PacifiCorp's contract with Technosylva and because the weather modeling and forecasting enhancements completed in 2025 were greater in scope than assumed in the Base 2023–**2025 WMP**. The updated Technosylva contract structure resulted in higher costs than originally anticipated. In addition, PacifiCorp expanded its high-performance computing clusters from two to five units to support both an extension of the Weather Research and Forecasting (WRF) deterministic model from 3.5 to 5 days and implementation of the WRF ensemble system. Building the ensemble model required additional computing capacity to generate nine high-resolution forecasts, which improve the detection of low-probability, high-impact events such as PSPS conditions. These enhancements provide greater advanced situational awareness capabilities than anticipated based on the original 2025 planned spend."

Additionally, PacifiCorp's **2025 EOY** provided a territory CAPEX and HFTD CAPEX actual value expenditure for SA-06 of \$954 (\$ thousand) and \$604 (\$ thousand) respectively. The EOY also provided a territory OPEX and HFTD OPEX actual value expenditure for SA-06 of \$42 (\$ thousand) and \$27 (\$ thousand) respectively.

5.3.8 Synthesis of Findings

5.3.8.1 Initiative Review

The IE has reasonable assurance of PacifiCorp's completion of the initiative target under "Situational Awareness and Forecasting" (SA-01) for 2025. The IE notes that initiatives SA-02, SA-03, SA-04, SA-05, and SA-06 did not have quantitative or qualitative targets for 2025. The IE performed a funding verification for all initiatives under "Situational Awareness and Forecasting."

5.3.8.2 Funding Verification

Initiative ID	Initiative	Planned Spend (\$ Thousands)	Actual Spend (\$ Thousands)	Variance	Variance Description ³³
SA-01	Environmental Monitoring Systems	\$120	\$141	18%	PacifiCorp's 2025 actual expenditure for SA-01 (Environmental Monitoring Systems) exceeded the planned budget because the company installed more environmental monitoring stations than originally projected in the 2023–2025 Base WMP. As reflected in the WMP, PacifiCorp adjusts annual installation quantities based on operational needs and situational awareness requirements, and in 2025, additional stations were installed to support wildfire risk monitoring beyond the initial forecast. These added installations resulted in higher costs than the planned budget assumed.

³³ The Office of Energy Infrastructure Safety does not require variance descriptions for absolute variances less than 10%.

Initiative ID	Initiative	Planned Spend (\$ Thousands)	Actual Spend (\$ Thousands)	Variance	Variance Description ³³
SA-02	Grid Monitoring Systems	\$0	\$34	N/A	PacifiCorp's 2025 actual expenditure for SA-02 (Grid Monitoring Systems) exceeded the planned budget because the initiative continued to incur communication costs associated with existing distribution fault anticipation (DFA) devices through 2025. Although support-service costs were no longer included in this initiative beginning in the 2023–2025 Base WMP, cellular communication charges remained necessary to operate the devices until their service contracts expired. These ongoing communication costs resulted in actual expenditures above the planned budget, which assumed no spending for 2025.
SA-03	Smoke and Air Quality Sensors	\$0	\$0	0%	N/A
SA-04	Ignition Detection Systems	\$80	\$80	0%	N/A

Initiative ID	Initiative	Planned Spend (\$ Thousands)	Actual Spend (\$ Thousands)	Variance	Variance Description ³³
SA-05	Weather Forecasting	\$670	\$195	-71%	PacifiCorp's 2025 actual expenditure for SA-05 (Weather Forecasting) was lower than the planned budget due to unanticipated Department of Energy (DOE) grant reimbursements and changes in PacifiCorp's contract with Technosylva. DOE reimbursements applied to more activities than initially expected, reducing net expenditure for the initiative. In addition, Technosylva's updated contract structure resulted in certain forecasting and modeling costs being invoiced differently than reflected in the planning forecast, contributing to lower actual spending within SA-05.

Initiative ID	Initiative	Planned Spend (\$ Thousands)	Actual Spend (\$ Thousands)	Variance	Variance Description ³³
SA-06	Fire Potential Index	\$96	\$996	938%	PacifiCorp's 2025 actual expenditure for SA-06 (Fire Potential Index) exceeded the planned budget due to changes in PacifiCorp's contract with Technosylva and because the weather modeling and forecasting enhancements completed in 2025 were greater in scope than assumed in the Base 2023– 2025 WMP . The updated Technosylva contract structure resulted in higher costs than originally anticipated. In addition, PacifiCorp expanded its high-performance computing clusters from two to five units to support both an extension of the Weather Research and Forecasting (WRF) deterministic model from 3.5 to 5 days and implementation of the WRF ensemble system. Building the ensemble model required additional computing capacity to generate nine high-resolution forecasts, which improve the detection of low-probability, high-impact events such as PSPS conditions. These enhancements provide greater advanced situational awareness capabilities than anticipated based on the original 2025 planned spend.

5.4 Emergency Preparedness

5.4.1 Summary Table

Initiative Number, WMP Section, and Name	WMP - Initiative Target	EC-Claimed Progress	EC- Claimed Initiative Status	Sample Size	Sample Validation Rate	Verification Method	IE Finding on Initiative [Initiative Validation Rate ³⁴]	WMP - Planned Spend (Thousands \$)	EC-Claimed Actual Spend (Thousands \$) [Variance]	Satisfied Risk Reduction Goal - Finding ³⁵
EP-01 8.4.2 Emergency Preparedness Plan	Complete Internal staff Emergency Coordination Center (ECC) and Department Operations Center (DOC) three-year training program	Complete	Target Met	Sampling not utilized	Sampling not utilized	Desktop	Initiative Validated	\$320	\$472 [47%]	N/A
EP-02 8.4.2.3 External Collaboration and Coordination	1 Functional Exercise (FE) 1 Tabletop Exercise (TTX) 1 workshop	Complete	Target Met	Sampling not utilized	Sampling not utilized	Desktop	Initiative Validated	\$10	\$1.3 [87%]	N/A
EP-03 8.4.4.1 Public Emergency Communication Strategy	No target	Not reported	Target met	Sampling not utilized	Sampling not utilized	Desktop	Detailed Initiative Review Not Performed	N/A ³⁶	N/A	N/A

³⁴ Initiative Validation Rate is equal to the Sample Validation Rate times the EC-Claimed Progress and then divided by the WMP-Initiative Target.

³⁵ PacifiCorp did not capture risk reduction goals in its **2025 WMP**. Thus, the IE could not validate if a goal was met.

³⁶ See Section 5.4.4.2 for details on funding for EP-03

Initiative Number, WMP Section, and Name	WMP - Initiative Target	EC-Claimed Progress	EC-Claimed Initiative Status	Sample Size	Sample Validation Rate	Verification Method	IE Finding on Initiative [Initiative Validation Rate ³⁴]	WMP - Planned Spend (Thousands \$)	EC-Claimed Actual Spend (Thousands \$) [Variance]	Satisfied Risk Reduction Goal - Finding ³⁵
EP-05 8.4.6 Customer support in wildfire and PSPS emergencies	Evaluate expansion of the free portable battery and backup electric power rebate programs	Complete	Target Met	Sampling not utilized	Sampling not utilized	Desktop	Initiative Validated	N/A ³⁷	N/A	N/A

³⁷ See Section 5.4.5.2 for details on funding for EP-05

5.4.2 Emergency Preparedness Plan (EP-01)

5.4.2.1 Initiative Review

Section 8.4.2 of PacifiCorp’s **2025 WMP** describes the company’s Emergency Response Plan (ERP), which is intended to be the primary reference material for any emergency or contingency response affecting PacifiCorp’s employees, assets, or business continuity. The plan contains functional annexes including governance transfer, emergency response organizational structure, on-scene incident response, resourcing and mutual assistance, training and exercise, and emergency communication.

The **2025 WMP** included a target of completion of an internal staff Emergency Coordination Center (ECC) and Department Operations Center (DOC) three-year training program by 2025.

To verify the target presented in the **2025 WMP** the IE requested evidence of completion as part of DR 5. In response, PacifiCorp provided the following documentation as well as a statement highlighting the completion of internal Emergency Coordination Center (ECC), Department Operations Center (DOC), and Executive Policy Group (EPG) process training to ECC, DOC, and EPG staff in 2025.

- **2025 Emergency Response Plan FOR INTERNAL USE ONLY.pdf**
- **2025 Annex 01 External Emergency Coordination and Communication FOR INTERNAL USE ONLY.pdf**
- **2025 Exec. Policy Group Training.pdf**
- **PAC-Executive Policy Group Onboarding_2025 CONFIDENTIAL.pdf**
- **Situation Manual PP ECC PSPS TTX 2025 CONFIDENTIAL.pdf**
- **PP ECC PSPS TTX 2025 CONFIDENTIALpptx**

By reviewing the provided documentation, compliance statement, and previous IE evaluation the IE was able to confirm the completion of an internal staff Emergency Coordination Center and Department Operations Center three-year training program as outlined in the **2025 WMP**.

Finding

The initiative has an IE Finding of “Initiative Validated”.³⁸

³⁸ An IVR cannot be calculated for qualitative initiatives. The Initiative Finding is based on the IE having reasonable assurance that PacifiCorp completed its qualitative target.

Based on the desktop review of the evidence provided, the IE has reasonable assurance that PacifiCorp met its **2025 WMP** target by completing the internal staff Emergency Coordination Center and Department Operations Center three-year training program.

5.4.2.2 Funding Verification

PacifiCorp's **2025 EC AIR** provided a projected budget of \$320 (\$ thousand) and an actual budget of \$472 (\$ thousand) for an absolute percent difference of 47%. PacifiCorp's variance explanation was as follows:

"PacifiCorp's 2025 actual expenditure for EP-01 (Emergency Preparedness Plan) exceeded the planned budget due to the expansion of emergency-related work groups supporting wildfire and PSPS preparedness activities. In 2025, PacifiCorp increased staffing and resources across the Wildfire Intelligence Center, Meteorology, Emergency Management, and Emergency Response functions to meet operational and regulatory needs. These organizational changes increased the labor and program costs attributed to this initiative beyond what was assumed in the **2025 WMP Update**."

Additionally, PacifiCorp's **2025 EOY** provided a territory OPEX and HFTD OPEX actual value expenditure for EP-01 and PS-01 of \$472 (\$ thousand) and \$299 (\$ thousand) respectively.

5.4.3 External Collaboration and Coordination (EP-02)

5.4.3.1 Initiative Review

Section 8.4.2.3 of PacifiCorp's **2025 WMP** describes several preparedness actions conducted for areas of wildfire concern within the company's service territory. Workshops and exercises have and will continue to be conducted annually. PacifiCorp has also hosted workshops to coordinate response and ensure response efforts are complementary to tribal, state, county, and local response actions. PacifiCorp conducts its response activities within the National Incident Management System (NIMS) organizational structure, which allows seamless integration with public sector agencies. Through these coordination sessions, PacifiCorp and other potentially affected agencies have developed partnerships that have proven very effective through both exercises and actual response to incidents.

The **2025 WMP** included a target of one Functional Exercise (FE), one Tabletop Exercise (TTX), and one Workshop. The **2025 Q4 QDR** reported these targets as completed in Q2 of 2025, with a Workshop completed in Q1, and a Functional Exercise and Tabletop Exercise completed in Q2.

The IE requested documentation of completion of the three activities as part of DR 5. In response, PacifiCorp provided the following files:

1. Pacific Power CA Wildfire Advisory Board March 2025_fv.pdf

2. WAB Board Slides and Feedback 3.21.25.pdf
3. 2025 CA PSPS TTX Del Norte Co Situation Manual – CONFIDENTIAL.pdf
4. 2025 CA PSPS TTX Del Norte CO Slide Deck – CONFIDENTIAL.pdf
5. CA TTX 5.27.25 Meeting Invitation with Materials Attached.pdf
6. In Person Sign In Sheet 5.27.2025.pdf
7. 2025 CA PSPS TTX Del Norte Co Attendance Virtual Roster.xlsx
8. 2025 CA PSPS TTX Del Norte Co Invite List v051425.xlsx
9. 2025 CA PSPS FE Siskiyou CO. EXPLAN – CONFIDENTIAL.pdf
10. CA Functional Exercise 6.5.2025.pdf
11. Exercise 2025 PacifiCorp Cal OES PSPS Notification Form PDF 06052025-EXERCISE.pdf
12. Pacific-Power Public-Safety-Portal External Orgs_060525.pdf
13. 2025 CA PSPS FE Siskiyou Co. Exercise Slides – CONFIDENTIAL.pptx
14. 2025 CA PSPS FE Siskiyou Co. Attendance report 6-05-25.xlsx

In addition to the files which demonstrate completion of the three activities, PacifiCorp also provided a brief summary of the dates and details of each activity. March 21st 2025 the workshop was conducted which is in line with the evidence files 1 and 2. May 27th 2025 the tabletop exercise was conducted which is in line with the evidence files 3 through 8. June 5th 2025 the function exercise was conducted which is in line with the evidence files 9 through 14.

Finding

The initiative has an IE Finding of “Initiative Validated”.³⁹

Based on the desktop review of the evidence provided, the IE has reasonable assurance that PacifiCorp met its **2025 WMP** target of completing one Functional Exercise, one Tabletop Exercise, and one Workshop in 2025.

5.4.3.2 Funding Verification

PacifiCorp’s **2025 EC AIR** provided a projected budget of \$10 (\$ thousand) and an actual budget of \$1.3 (\$ thousand) for an absolute percent difference of 87%. PacifiCorp’s variance explanation was as follows:

“PacifiCorp’s 2025 actual expenditure for EP-02 (External Collaboration and Coordination) was lower than the planned budget because funding requirements for this initiative continued to decline in 2025. As coordination processes and stakeholder engagement activities became more streamlined, fewer resources were needed than assumed in the **2025 WMP Update**, resulting in actual expenditures below the planned level.”

³⁹ An IVR cannot be calculated for qualitative initiatives. The Initiative Finding is based on the IE having reasonable assurance that PacifiCorp completed its qualitative target.

Additionally, PacifiCorp's **2025 EOY** provided a territory CAPEX and HFTD CAPEX actual value expenditure for EP-02 and EP-03 of \$100 (\$ thousand) and \$44 (\$ thousand) respectively. The EOY also provided a territory OPEX and HFTD OPEX actual value expenditure for EP-02 and EP-03 of \$44 (\$ thousand) and \$1 (\$ thousand) respectively.

PacifiCorp's variance explanation for the difference between the EOY and AIR was as follows:

"The AIR and EOY present this activity at different levels of granularity. The AIR reports EP-02, External Collaboration and Coordination, separately and reflects an actual expenditure of \$1.3 thousand for that initiative, while the EOY reports the corresponding activity using the combined tracking IDs EP-02; EP-03 and separates expenditures by expense type.

As a result, the EOY CAPEX and OPEX values for the combined EP-02;EP-03 activity should not be added together and compared directly to the AIR value reported for EP-02 alone. The apparent discrepancy results from the difference in reporting structure rather than a difference in the reported EP-02 OPEX value."

5.4.4 Public Emergency Communication Strategy (EP-03)

5.4.4.1 Initiative Review

Section 8.4.4.1 of PacifiCorp's **2025 WMP** describes the company's protocols for emergency communications and lists processes and procedures for notification of stakeholders. These stakeholders include but are not limited to the general public, priority essential services and public safety partners, access and functional needs (AFN) populations, populations with limited English proficiency, tribes, and people in remote areas.

While this initiative did have a reported spend for 2025, which was recorded in the **2025 EOY** as a combined total with EP-02, it did not have a quantitative or qualitative target for the same period. As such, the IE did not perform a detailed review of the initiative as part of the 2025 Independent Evaluation.

5.4.4.2 Funding Verification

PacifiCorp's **2025 EC AIR** did not provide a planned or actual budget, absolute variance, or variance explanation for EP-03.

PacifiCorp's **2025 EOY** provided a territory CAPEX and HFTD CAPEX actual value expenditure for EP-02 and EP-03 of \$100 (\$ thousand) and \$44 (\$ thousand) respectively. The EOY also provided a territory OPEX and HFTD OPEX actual value expenditure for EP-02 and EP-03 of \$44 (\$ thousand) and \$1 (\$ thousand) respectively.

PacifiCorp's variance explanation for the difference between the EOY and AIR was as follows:

"The AIR and EOY present this activity at different levels of granularity. The AIR reports EP-02, External Collaboration and Coordination, separately and reflects an actual expenditure of \$1.3 thousand for that initiative, while the EOY reports the corresponding activity using the combined tracking IDs EP-02; EP-03 and separates expenditures by expense type.

As a result, the EOY CAPEX and OPEX values for the combined EP-02; EP-03 activity should not be added together and compared directly to the AIR value reported for EP-02 alone. The apparent discrepancy results from the difference in reporting structure rather than a difference in the reported EP-02 OPEX value."

5.4.5 Customer Support in Wildfire and PSPS Emergencies (EP-05)

5.4.5.1 Initiative Review

Section 8.4.6 of PacifiCorp's **2025 WMP** describes the company's customer support efforts in wildfire and PSPS emergencies, including AFN notification protocols and provision of medical baseline support services through its portable battery program. The portable battery program offers free portable batteries to eligible medical baseline customers as well as device education and technical support based on a technical evaluation of the customer's unique needs.

The **2025 WMP** included a target of "Evaluate expansion of the free portable battery and backup electric power rebate programs".

The IE requested evidence of completion of said evaluation as part of DR 5. In response, PacifiCorp provided the following statement as well as a group of files supporting the statement.

"Customer support materials related to the backup power programs as stated in the 2025 AFN Plan, Q4 report include: Accessibility Programs website, Accessibility Programs Toolkit for Partners; Accessibility Programs flyer; Master Meter and Tenant Preparedness Toolkit. Backup power programs were also promoted through all the outreach efforts described in DR 5 Item 4 above.

An evaluation of the Battery Rebate Programs was completed in Q4 2025 and used benchmark data from other peer utilities in CA to determine the effectiveness of the program. The evaluation plotted the electrical dependency (needs) against income (access) of PACs customers in HFRAs. Results from the evaluation determined that PACs rebate program in CA is well aligned to its utility peers and that funds are being allocated appropriately to meet the intended goals of the program. No program changes in CA were recommended at this time.

Awareness of the free portable battery and back up electrical power rebate programs has expanded since baseline data was captured in 2023. At that time, eligible customer awareness of the program was at 8%. According to the latest customer survey results performed in November 2025, three in ten (30%) are aware of Pacific Power’s Generator Rebate Program, which is consistent with survey results from March 2025 (30%), November 2024 (31%) and March 2024 (34%). Of the customers who are aware of Pacific Power’s Generator Rebate program, 33% heard of the program through the Pacific Power website and 13% have used the program. Nearly three quarters (68%) of those who have used the generator rebate program are satisfied.”

By reviewing the statements and evidence provide via DR 5 Item 6, the IE was able to determine that PacifiCorp has made adequate efforts to evaluate the expansion of the free portable battery and backup electric power rebate programs in 2025.

Finding

The initiative has an IE Finding of “Initiative Validated”.⁴⁰

Based on the desktop review of the evidence provided, the IE has reasonable assurance that PacifiCorp met its **2025 WMP** qualitative target of evaluating the expansion of the free portable battery and backup electric power rebate programs in 2025,

5.4.5.2 Funding Verification

PacifiCorp’s **2025 EC AIR** did not provide a planned or actual budget, absolute variance, or variance explanation for EP-05.

PacifiCorp’s **2025 EOY** provided a territory OPEX and HFTD OPEX actual value expenditure for EP-05 of \$114 (\$ thousand) and \$48 (\$ thousand) respectively. PacifiCorp’s explanation for tracking in the EOY and not the AIR was as follows:

“PacifiCorp acknowledges that EP-05 was omitted from the AIR expenditure table. This was a reporting error in the AIR, not an indication that EP-05 expenditures were unavailable or not tracked.

EP-05, Customer Support in Wildfire and PSPS Emergencies, was captured in the EOY report, which identifies EP-05 as the applicable utility mitigation activity tracking ID, reflects no CAPEX actuals, and reports OPEX actuals for the activity.”

⁴⁰ An IVR cannot be calculated for qualitative initiatives. The Initiative Finding is based on the IE having reasonable assurance that PacifiCorp completed its qualitative target.

5.4.6 Synthesis of Findings

5.4.6.1 Initiative Review

The IE has reasonable assurance of PacifiCorp's completion of the initiative target under "Emergency Preparedness" (EP-01) for 2025. The IE notes that initiatives EP-02, EP-03, and EP-05 did not have quantitative or qualitative targets for 2025. The IE performed a funding verification for all initiatives under "Emergency Preparedness".

5.4.6.2 Funding Verification

Initiative ID	Initiative	Planned Spend (\$ Thousands)	Actual Spend (\$ Thousands)	Variance	Variance Description ⁴¹
EP-01	Emergency Preparedness Plan	\$320	\$472	47%	PacifiCorp's 2025 actual expenditure for EP-01 (Emergency Preparedness Plan) exceeded the planned budget due to the expansion of emergency-related work groups supporting wildfire and PSPS preparedness activities. In 2025, PacifiCorp increased staffing and resources across the Wildfire Intelligence Center, Meteorology, Emergency Management, and Emergency Response functions to meet operational and regulatory needs. These organizational changes increased the labor and program costs attributed to this initiative beyond what was assumed in the 2025 WMP Update .
EP-02	External Collaboration and Coordination	\$10	\$1.3	87%	PacifiCorp's 2025 actual expenditure for EP-02 (External Collaboration and Coordination) was lower than the planned budget because funding requirements for this initiative continued to decline in 2025. As coordination processes and stakeholder engagement activities became more streamlined, fewer resources were needed than assumed in the 2025 WMP Update , resulting in actual expenditures below the planned level.

⁴¹ The Office of Energy Infrastructure Safety does not require variance descriptions for absolute variances less than 10%.

5.5 Community Outreach and Engagement

5.5.1 Summary Table

Initiative Number, WMP Section, and Name	WMP - Initiative Target	EC-Claimed Progress	EC-Claimed Initiative Status	Sample Size	Sample Validation Rate	Verification Method	IE Finding on Initiative [Initiative Validation Rate ⁴²]	WMP - Planned Spend (Thousands \$)	EC-Claimed Actual Spend (Thousands \$) [Variance]	Satisfied Risk Reduction Goal - Finding ⁴³
CO-01 8.5.2 Public Outreach and Education Awareness Program	60% or more of the sample survey are aware of wildfire safety communications									
	PacifiCorp remains the most mentioned source of communication about wildfire preparedness	Complete	Target Met	Sampling not utilized	Sampling not utilized	Desktop	Initiative Validated	\$110	\$107 [-3%]	N/A
	1 additional language for the medical certificate									
CO-02 8.5.3 Engagement with access and functional needs populations	Increase outreach to AFN populations	Complete	Target Met	Sampling not utilized	Sampling not utilized	Desktop	Initiative Validated	N/A ⁴⁴	N/A	N/A

⁴² Initiative Validation Rate is equal to the Sample Validation Rate times the EC-Claimed Progress and then divided by the WMP-Initiative Target.

⁴³ PacifiCorp did not capture risk reduction goals in its **2025 WMP**. Thus, the IE could not validate if a goal was met.

⁴⁴ See Section 5.5.3.2 for details on funding for CO-02.

Initiative Number, WMP Section, and Name	WMP - Initiative Target	EC-Claimed Progress	EC-Claimed Initiative Status	Sample Size	Sample Validation Rate	Verification Method	IE Finding on Initiative [Initiative Validation Rate ⁴²]	WMP - Planned Spend (Thousands \$)	EC-Claimed Actual Spend (Thousands \$) [Variance]	Satisfied Risk Reduction Goal - Finding ⁴³
CO-03 8.5.4 Collaboration on local wildfire mitigation planning	Continue partnering with public safety partners in communities throughout California regarding wildfire safety and preparedness and PSPS	Complete	Target Met	Sampling not utilized	Sampling not utilized	Desktop	Initiative Validated	N/A ⁴⁵	N/A	N/A

⁴⁵ See Section 5.5.4.2 for details on funding for CO-03.

5.5.2 Public Outreach and Education Awareness Program (CO-01)

5.5.2.1 Initiative Review

According to Section 8.5.2 of PacifiCorp's **2025 WMP**, the overall objective of the public outreach and education awareness program is to partner with public safety partners in communities throughout California regarding wildfire safety, preparedness, and PSPS. PacifiCorp does this by engaging the public in the WMP decision-making process, engaging with AFN populations, local governments, and tribal communities, and collaborating on local wildfire mitigation and planning.

The **2025 WMP** identified annual targets of achieving at least 60% awareness of wildfire safety communications among survey respondents, remaining the most mentioned source of communication about wildfire preparedness, and adding one additional language for the medical certificate. To validate these targets, the IE requested supporting documentation in DR 5. In response, PacifiCorp provided evidence document *Fall 2025 California Wildfire Survey Results.pptx*, which indicated that 79% of surveyed individuals were aware of wildfire safety communications and that Pacific Power remained the most mentioned source of wildfire preparedness information at 53%. Additional evidence, including *PP_Tenant-PSPS-Flyer_Spanish.pdf* and slide 26 of *Pacific Power CA Wildfire Advisory Board March 2025_fv.pdf*, demonstrated that an additional language had been added for the medical certificate.

Finding

The initiative has an IE Finding of "Initiative Validated".⁴⁶

Based on the desktop review of the evidence provided, the IE has reasonable assurance that PacifiCorp met its **2025 WMP** targets for public outreach and education awareness by achieving greater than 60% awareness of wildfire safety communications among survey respondents, remaining the most mentioned source of communication about wildfire preparedness, and adding one additional language for the medical certificate.

5.5.2.2 Funding Verification

PacifiCorp's **2025 EC AIR** provided a projected budget of \$110 (\$ thousand) and an actual budget of \$107 (\$ thousand) for an absolute percent difference of 3%. Additionally, PacifiCorp's **2025 EOY** provided a territory OPEX and HFTD OPEX actual value expenditure for CO-01, CO-02, CO-03, and CO-04 of \$107 (\$ thousand) and \$45 (\$ thousand) respectively. The EOY also provided the following comment, "Allocation of costs to HFTD is based on number of customers in HFTD and may not be auditable. Costs for CO-02, CO-03, and CO-04 included in CO-01"

⁴⁶ An IVR cannot be calculated for qualitative initiatives. The Initiative Finding is based on the IE having reasonable assurance that PacifiCorp completed its qualitative target.

5.5.3 Engagement with Aces and Function Needs Populations (CO-02)

5.5.3.1 Initiative Review

According to Section 8.5.3 of PacifiCorp’s **2025 WMP**, the overall objective of this initiative is to increase outreach to Access and Functional Needs (AFN) populations.

The IE noted that this initiative had a stated objective in the **2025 WMP**, but no corresponding target was reported in the **2025 Q4 QDR**. To confirm that the initiative remained active and subject to evaluation in 2025, the IE inquired in *DR 2*. In response, PacifiCorp explained that the initiative remains active, that the **2025 WMP** includes the three-year objective of increasing outreach to AFN populations with completion by October 2025, and that related AFN deliverables are reflected elsewhere in the reporting structure, including CO-01.

To evaluate this objective, the IE sought to confirm that PacifiCorp had increased its outreach to AFN populations relative to prior-year efforts. In *DR 9*, the IE requested evidence demonstrating a year-over-year increase in AFN outreach. In response, PacifiCorp provided its 2024 AFN Plan and 2025 AFN Plan. Based on comparison of these materials, together with supporting evidence such as slides 17, 26, and 27 of ***Pacific Power CA Wildfire Advisory Board March_fv.pdf***, the IE determined that PacifiCorp provided sufficient evidence to demonstrate increased outreach to AFN populations in 2025.

Finding

The initiative has an IE Finding of “Initiative Validated”.⁴⁷

Based on the desktop review of the evidence provided, the IE has reasonable assurance that PacifiCorp increased outreach to AFN populations in 2025, consistent with the objective set forth in **2025 WMP**.

5.5.3.2 Funding Verification

PacifiCorp’s **2025 EC AIR** did not provide a planned or actual budget, absolute variance, or variance explanation for CO-02.

PacifiCorp’s **2025 EOY** provided a territory OPEX and HFTD OPEX actual value expenditure for CO-01, CO-02, CO-03, and CO-04 of \$107 (\$ thousand) and \$45 (\$ thousand) respectively. The EOY also provided the following comment, “Allocation of costs to HFTD is based on number of customers in HFTD and may not be auditable. Costs for CO-02, CO-03, and CO-04 included in CO-01”

⁴⁷ An IVR cannot be calculated for qualitative initiatives. The Initiative Finding is based on the IE having reasonable assurance that PacifiCorp completed its qualitative target.

5.5.4 Collaboration on Local Wildfire Mitigation Planning (CO-03)

5.5.4.1 Initiative Review

According to Section 8.5.4 of PacifiCorp’s **2025 WMP**, the overall objective of this initiative is to collaborate with communities on local wildfire mitigation planning by engaging industry leaders, community leaders and members, and local emergency response management organizations.

The IE noted that this initiative had a stated objective in the **2025 WMP** but no corresponding target was reported in the **2025 Q4 QDR**. To confirm that the initiative remained active and subject to evaluation in 2025, the IE inquired in *DR 2*. In response, PacifiCorp explained that the initiative remains active and that the **2025 WMP** identifies a three-year objective to continue partnering with public safety partners in communities throughout California regarding wildfire safety, preparedness, and PSPS, with completion by October 2025 and verification through records of public safety partner meetings, workshops, and exercises, as described in Section 8.5.4. PacifiCorp further explained that, although this objective did not appear as a separate quantitative target in the **2025 Q4 QDR**, it remained valid and subject to evaluation for 2025 completion under the **2025 WMP**.

To evaluate this objective, the IE sought to confirm that PacifiCorp continued to partner with public safety partners in communities throughout California regarding wildfire safety, preparedness, and PSPS during 2025. In *DR 5*, the IE requested evidence demonstrating such engagement. In response, PacifiCorp provided supporting evidence, including 2025 CA PSPS FE Siskiyou Co. Exercise slides-CONFIDENTIAL.pptx and slides 7 and 23 of **Pacific Power CA Wildfire Advisory Board March_fv.pdf**. Based on review of these materials, together with other supporting documentation provided, the IE determined that PacifiCorp provided sufficient evidence to demonstrate continued collaboration with public safety partners in 2025.

Finding

The initiative has an IE Finding of “Initiative Validated”.⁴⁸

Based on the desktop review of the evidence provided, the IE has reasonable assurance that PacifiCorp continued to partner with public safety partners in communities throughout California regarding wildfire safety, preparedness, and PSPS in 2025, consistent with the objective set forth in its **2025 WMP**.

⁴⁸ An IVR cannot be calculated for qualitative initiatives. The Initiative Finding is based on the IE having reasonable assurance that PacifiCorp completed its qualitative target.

5.5.4.2 Funding Verification

PacifiCorp's **2025 EC AIR** did not provide a planned or actual budget, absolute variance, or variance explanation for CO-03.

PacifiCorp's **2025 EOY** provided a territory OPEX and HFTD OPEX actual value expenditure for CO-01, CO-02, CO-03, and CO-04 of \$107 (\$ thousand) and \$45 (\$ thousand) respectively. The EOY also provided the following comment, "Allocation of costs to HFTD is based on number of customers in HFTD and may not be auditable. Costs for CO-02, CO-03, and CO-04 included in CO-01".

5.5.5 Synthesis of Findings

5.5.5.1 Initiative Review

The IE has reasonable assurance of PacifiCorp's completion of the initiative targets under "Community Outreach and Engagement" (CO-01, CO-02, and CO-03) for 2025. The IE will note that initiative targets for CO-02 and CO-03 were not tracked in the **2025 QDR** but were present in the **2025 WMP**. As such, the IE recommends that all initiatives that have targets (quantitative or qualitative) present in the WMP receive corresponding tracking in the QDR for all future WMP and QDR submissions.

5.5.5.2 Funding Verification

Initiative ID	Initiative	Planned Spend (\$ Thousands)	Actual Spend (\$ Thousands)	Variance	Variance Description ⁴⁹
CO-01	Public Outreach and Education Awareness Program	\$110	\$107	-3%	N/A

⁴⁹ The Office of Energy Infrastructure Safety does not require variance descriptions for absolute variances less than 10%.

5.6 Risk Methodology and Assessment

5.6.1 Summary Table

Initiative Number, WMP Section, and Name	WMP - Initiative Target	EC- Claimed Progress	EC- Claimed Initiative Status	Sample Size	Sample Validation Rate	Verification Method	IE Finding on Initiative [Initiative Validation Rate ⁵⁰]	WMP - Planned Spend (Thousands \$)	EC-Claimed Actual Spend (Thousands \$) [Variance]	Satisfied Risk Reduction Goal - Finding ⁵¹
RA-01 6.2.2 Risk and Risk Components Calculations	No target	Not reported	Target met	Sampling not utilized	Sampling not utilized	Desktop	Detailed Initiative Review Not Performed	\$155	\$345 [123%]	N/A
RA-02 6.4.1 Top Risk Areas within the HFRA	No target	Not reported	Target met	Sampling not utilized	Sampling not utilized	Desktop	Detailed Initiative Review Not Performed	N/A ⁵²	N/A	N/A
RA-03 6.4.3 Other Key Metrics	No target	Not reported	Target met	Sampling not utilized	Sampling not utilized	Desktop	Detailed Initiative Review Not Performed	\$0	\$0 [0%]	N/A
RA-04 6.5 Enterprise System for Risk Assessment	No target	Not reported	Target met	Sampling not utilized	Sampling not utilized	Desktop	Detailed Initiative Review Not Performed	\$73	\$701 [860%]	N/A

⁵⁰ Initiative Validation Rate is equal to the Sample Validation Rate times the EC-Claimed Progress and then divided by the WMP-Initiative Target.

⁵¹ PacifiCorp did not capture risk reduction goals in its **2025 WMP**. Thus, the IE could not validate if a goal was met.

⁵² See Section 5.6.3.2 for details on funding for RA-02

5.6.2 Risk and Risk Components Calculation (RA-01)

5.6.2.1 Initiative Review

Section 6.2.2 of PacifiCorp’s **2025 WMP** describes how the company uses its FireSight model to calculate likelihood of ignition, consequences of ignition, and ignition (wildfire) risk – combining likelihood and consequences – as part of its risk analysis framework. This ignition risk currently stands in for the overall utility risk used to prioritize mitigation actions. However, PacifiCorp is also developing a public safety power shutoff (PSPS) risk assessment solution to quantify PSPS risk as an additional input to the overall utility risk model.

While this initiative did have a budgeted spend for 2025, which was recorded in the **2025 EOY** and was corroborated via the **2025 EC AIR**, it did not have a quantitative or qualitative target for the same period. As such, the IE did not perform a detailed review of the initiative as part of the 2025 Independent Evaluation.

5.6.2.2 Funding Verification

PacifiCorp’s **2025 EC AIR** provided a projected budget of \$155 (\$ thousand) and an actual budget of \$345 (\$ thousand) for an absolute percent difference of 122%. PacifiCorp’s variance explanation was as follows:

“PacifiCorp’s 2025 expenditure for RA-01 (Risk and Risk Components Calculation) exceeded the planned budget because the Asset Risk Data Science team added four additional full-time employees to support increasingly complex risk-modeling requirements. This staffing expansion increased the operations and maintenance hours and associated costs allocated to this initiative, resulting in actual expenditures above the planned level.”

Additionally, PacifiCorp’s **2025 EOY** provided a territory OPEX and HFTD PPEX actual value expenditure for RA-01, RA-02, and RA-03 of \$351 (\$ thousand) and \$222 (\$ thousand) respectively.

PacifiCorp’s variance explanation for the difference between the EOY and AIR was as follows:

“PacifiCorp acknowledges that the Risk Methodology and Assessment expenditures were not presented correctly in the AIR expenditure table. This was a reporting error in the AIR, not an indication that the expenditures were unavailable or not tracked.

The AIR reported RA-01 and RA-03 separately and did not provide a separate value for RA-02, while the EOY reported a combined OPEX entry for RA-01;RA-02;RA-03.”

5.6.3 Top Risk Areas within the HFRA (RA-02)

5.6.3.1 Initiative Review

Section 6.4.1 of PacifiCorp's **2025 WMP** describes how PacifiCorp uses the risk scores calculated under RA-01 to identify High Fire Risk Areas (HFRAs) where mitigation efforts are prioritized.

While this initiative did have a budgeted spend for 2025, which was recorded in the **2025 EOY** and was corroborated via the **2025 EC AIR**, it did not have a quantitative or qualitative target for the same period. As such, the IE did not perform a detailed review of the initiative as part of the 2025 Independent Evaluation.

5.6.3.2 Funding Verification

PacifiCorp's **2025 EC AIR** did not provide a planned or actual budget, absolute variance, or variance explanation for RA-02.

Additionally, PacifiCorp's **2025 EOY** provided a territory OPEX and HFTD PPEX actual value expenditure for RA-01, RA-02, and RA-03 of \$351 (\$ thousand) and \$222 (\$ thousand) respectively. PacifiCorp's explanation for tracking in the EOY and not the AIR was as follows:

"PacifiCorp acknowledges that RA-02 was not separately included in the AIR expenditure table. This was a reporting error in the AIR, not an indication that RA-02 expenditures were unavailable or not tracked.

In the EOY report, Risk Methodology and Assessment was reported as a combined entry for tracking IDs RA-01;RA-02;RA-03, and the associated OPEX actual expenditure was captured in that combined reporting structure."

5.6.4 Other Key Metrics (RA-03)

5.6.4.1 Initiative Review

Section 6.4.3 of PacifiCorp's **2025 WMP** describes its plans to track risk-spend efficiency (RSE) as a key metric. Section 7.1.4.1 explains that RSE scores are calculated to capture changes in risk per dollar spent. The main objective of RSE scores is to allow PacifiCorp to target certain high fire risk areas for mitigation efforts (i.e., covered conductors, undergrounding, etc.) while allowing for efficient and smart spending. To calculate RSE scores, PacifiCorp must analyze the key drivers of ignition risk asset-wise, the mitigation efforts available, and their effectiveness and cost.

While this initiative did have a budgeted spend for 2025, which was recorded in the **2025 EOY** and was corroborated via the **2025 EC AIR**, it did not have a quantitative or qualitative target for the same period. As such, the IE did not perform a detailed review of the initiative as part of the 2025 Independent Evaluation.

5.6.4.2 Funding Verification

PacifiCorp's **2025 EC AIR** provided a projected budget of \$0 (\$ thousand) and an actual budget of \$0 (\$ thousand) for an absolute percent difference of 0%.

Additionally, PacifiCorp's **2025 EOY** provided a territory OPEX and HFTD PPEX actual value expenditure for RA-01, RA-02, and RA-03 of \$351 (\$ thousand) and \$222 (\$ thousand) respectively.

PacifiCorp's variance explanation for the difference between the EOY and AIR was as follows:

"PacifiCorp acknowledges that the Risk Methodology and Assessment expenditures were not presented correctly in the AIR expenditure table. This was a reporting error in the AIR, not an indication that the expenditures were unavailable or not tracked.

The AIR reported RA-01 and RA-03 separately and did not provide a separate value for RA-02, while the EOY reported a combined OPEX entry for RA-01;RA-02;RA-03."

5.6.5 Enterprise System for Risk Assessment (RA-04)

5.6.5.1 Initiative Review

Section 6.5 of PacifiCorp's **2025 WMP** states that PacifiCorp does not have a centralized enterprise risk assessment database to store wildfire and PSPS data. While the company's PROSPER repository tracks outages and causes, it is not designed to calculate wildfire risk, PSPS risk, or provide analytics to show outage trends or locations where there is higher risk. For fire incident tracking, PacifiCorp has implemented Fire Incident Tracking in an advanced data analytics platform to enable long-term trend analysis. Over time, the data analytics tool will combine fire incident information with utility asset and outage data (if applicable) to create a comprehensive view of each tracked fire event. The analytics platform will also be used to enable viewing of FireSight risk outputs, PSPS risk, and utility risk in a single location to support quantification of utility risk and to identify locations where mitigation efforts are needed to reduce the risk of a wildfire or PSPS event.

While this initiative did have a budgeted spend for 2025, which was recorded in the **2025 EOY** and was corroborated via the **2025 EC AIR**, it did not have a quantitative or qualitative target for the same period. As such, the IE did not perform a detailed review of the initiative as part of the 2025 Independent Evaluation.

5.6.5.2 Funding Verification

PacifiCorp's **2025 EC AIR** provided a projected budget of \$73 (\$ thousand) and an actual budget of \$701 (\$ thousand) for an absolute percent difference of 860%.

PacifiCorp's variance explanation was as follows:

“PacifiCorp’s 2025 expenditure for RA-04 (Enterprise System for Risk Assessment) exceeded the planned budget because the original estimate assumed that software costs would be expensed over multiple years rather than capitalized. When the costs were instead capitalized in 2025, a larger portion of the total cost was recognized within the year, resulting in actual expenditures above the planned level.”

Additionally, PacifiCorp’s **2025 EOY** provided a territory CAPEX and HFTD CAPEX actual value expenditure for RA-04 of \$676 (\$ thousand) and \$409 (\$ thousand) respectively. The EOY also provided a territory OPEX and HFTD OPEX actual value expenditure for RA-04 of \$25 (\$ thousand) and \$10 (\$ thousand) respectively.

5.6.6 Synthesis of Findings

5.6.6.1 Initiative Review

The IE identified that the initiatives (RA-01, RA-02, RA-03, and RA-04) in the “Risk Methodology and Assessment” category did not have quantitative or qualitative targets for 2025. As such, the IE did not perform a detailed review of these initiatives against targets. However, the IE did perform a funding verification for the initiative category.

5.6.6.2 Funding Verification

Initiative ID	Initiative	Planned Spend (\$ Thousands)	Actual Spend (\$ Thousands)	Variance	Variance Description ⁵³
RA-01	Risk and Risk Components Calculation	\$155	\$345	122%	PacifiCorp's 2025 expenditure for RA-01 (Risk and Risk Components Calculation) exceeded the planned budget because the Asset Risk Data Science team added four additional full-time employees to support increasingly complex risk-modeling requirements. This staffing expansion increased the operations and maintenance hours and associated costs allocated to this initiative, resulting in actual expenditures above the planned level.
RA-03	Other Key Metrics	\$0	\$0	0%	N/A
RA-04	Enterprise System for Risk Assessment	\$73	\$701	860%	PacifiCorp's 2025 expenditure for RA-04 (Enterprise System for Risk Assessment) exceeded the planned budget because the original estimate assumed that software costs would be expensed over multiple years rather than capitalized. When the costs were instead capitalized in 2025, a larger portion of the total cost was recognized within the year, resulting in actual expenditures above the planned level.

⁵³ The Office of Energy Infrastructure Safety does not require variance descriptions for absolute variances less than 10%.

5.7 Public Safety Power Shutoff

5.7.1 Summary Table

Initiative Number, WMP Section, and Name	WMP - Initiative Target	EC-Claimed Progress	EC- Claimed Initiative Status	Sample Size	Sample Validation Rate	Verification Method	IE Finding on Initiative [Initiative Validation Rate ⁵⁴]	WMP - Planned Spend (Thousands \$)	EC-Claimed Actual Spend (Thousands \$) [Variance]	Satisfied Risk Reduction Goal - Finding ⁵⁵
PS-01 9.1.6 Protocols on PSPS	No target	Not reported	Target met	Sampling not utilized	Sampling not utilized	Desktop	Detailed Initiative Review Not Performed	\$750	\$0 [-100%]	N/A

⁵⁴ Initiative Validation Rate is equal to the Sample Validation Rate times the EC-Claimed Progress and then divided by the WMP-Initiative Target.

⁵⁵ PacifiCorp did not capture risk reduction goals in its **2025 WMP**. Thus, the IE could not validate if a goal was met.

5.7.2 Protocols on PSPS (PS-01)

5.7.2.1 Initiative Review

Section 9.1.6 of PacifiCorp's **2025 WMP** describes the company's protocols for implementing a Public Safety Power Shutoff (PSPS). It states that the primary factors considered in deciding to de-energize are the 72-hour weather circuit forecast, pre-event inspections and strategic field observations, information from emergency services, meteorology and outage impact data including 95th and 99th percentile winds, location of existing fires, and other, non-weather-related factors.

While this initiative did have a budgeted spend for 2025, which was recorded in the **2025 EOY** and was corroborated via the **2025 EC AIR**, it did not have a quantitative or qualitative target for the same period. As such, the IE did not perform a detailed review of PS-01 as part of the 2025 Independent Evaluation.

5.7.2.2 Funding Verification

PacifiCorp's **2025 EC AIR** provided a projected budget of \$750 (\$ thousand) and an actual budget of \$0 (\$ thousand) for an absolute percent difference of 100%. PacifiCorp's variance explanation was as follows:

"PacifiCorp's 2025 actual expenditure for PS-01 (Protocols on PSPS) was lower than the planned budget because no PSPS events occurred in 2025. In the absence of PSPS events, no related operational activities or associated costs were incurred, resulting in actual expenditures below the planned level."

Additionally, PacifiCorp's **2025 EOY** provided a territory OPEX and HFTD OPEX actual value expenditure for EP-01 and PS-01 of \$472 (\$ thousand) and \$299 (\$ thousand) respectively.

5.7.3 Synthesis of Findings

5.7.3.1 Initiative Review

The sole initiative in the "Public Safety Power Shutoff" category (PS-01) had no quantitative or qualitative target for 2025. As such, the IE did not perform a detailed review of this initiative, nor was it reviewed in the 2024 WMP IE ARC. PacifiCorp did not have any PSPS events in 2025 or 2024.

5.7.3.2 Funding Verification

Initiative ID	Initiative	Planned Spend (\$ Thousands)	Actual Spend (\$ Thousands)	Variance	Variance Description ⁵⁶
PS-01	Protocols on PSPS	\$750	\$0	-100%	PacifiCorp's 2025 actual expenditure for PS-01 (Protocols on PSPS) was lower than the planned budget because no PSPS events occurred in 2025. In the absence of PSPS events, no related operational activities or associated costs were incurred, resulting in actual expenditures below the planned level.

⁵⁶ The Office of Energy Infrastructure Safety does not require variance descriptions for absolute variances less than 10%.

5.8 Wildfire Mitigation Plan Strategy Development

5.8.1 Summary Table

Initiative Number, WMP Section, and Name	WMP - Initiative Target	EC-Claimed Progress	EC-Claimed Initiative Status	Sample Size	Sample Validation Rate	Verification Method	IE Finding on Initiative [Initiative Validation Rate ⁵⁷]	WMP - Planned Spend (Thousands \$)	EC-Claimed Actual Spend (Thousands \$) [Variance]	Satisfied Risk Reduction Goal - Finding ⁵⁸
WP-01 7.1.2 Wildfire Mitigation Strategy Development	No target	Not reported	Target met	Sampling not utilized	Sampling not utilized	Desktop	Detailed Initiative Review Not Performed	\$845	\$980 [16%]	N/A
WP-02 7.1.4.1 Identifying and Evaluating Mitigation Initiatives	No target	Not reported	Target met	Sampling not utilized	Sampling not utilized	Desktop	Detailed Initiative Review Not Performed	\$280	\$18 [-94%]	N/A

⁵⁷ Initiative Validation Rate is equal to the Sample Validation Rate times the EC-Claimed Progress and then divided by the WMP-Initiative Target.

⁵⁸ PacifiCorp did not capture risk reduction goals in its **2025 WMP**. Thus, the IE could not validate if a goal was met.

5.8.2 Wildfire Mitigation Strategy Development (WP-01)

5.8.2.1 Initiative Review

Section 7 of PacifiCorp's **2025 WMP** describes its wildfire mitigation strategy development efforts. In 2022, PacifiCorp developed a new department, commonly referred to as Wildfire Safety. This new department consists of 13 full-time employees, is led by a Managing Director, and includes both a project management office focused on delivery of line rebuilds and other system-hardening initiatives and a project delivery team responsible for overall plan development, monitoring, and implementation.

While the broader Wildfire Safety team is tasked with supporting all types of wildfire mitigation initiatives and strategies across the company's entire service territory, a key function of the Wildfire Safety Program Delivery team is to develop, implement, monitor, and improve the company's WMP. It is the responsibility of Wildfire Safety Program Delivery to coordinate with other internal departments such as Asset Management, Vegetation Management, Field Operations, and Emergency Management to ensure that all aspects of the plan are delivered. Additionally, Wildfire Safety regularly evaluates its plan and provides updates as needed and consistent with statutory and regulatory requirements, including managing QDR, the AIR, and change order requests.

While this initiative did have a budgeted spend for 2025, which was recorded in the **2025 EOY** and was corroborated via the **2025 EC AIR**, it did not have a quantitative or qualitative target for the same period. As such, the IE did not perform a detailed review of WP-01 as part of the 2025 Independent Evaluation.

5.8.2.2 Funding Verification

PacifiCorp's **2025 EC AIR** provided a projected budget of \$845 (\$ thousand) and an actual budget of \$980 (\$ thousand) for an absolute percent difference of 16%. PacifiCorp's variance explanation was as follows:

"PacifiCorp's 2025 actual expenditure for WP-01 (Wildfire Mitigation Strategy Development) exceeded the planned budget due to organizational changes in wildfire mitigation planning. During 2025, PacifiCorp reorganized staff supporting wildfire mitigation strategy development and adjusted how planning-related costs were allocated across the company's service territories. These changes resulted in a greater share of wildfire mitigation planning costs attributed to this initiative than was assumed in the **2025 WMP Update** used to establish the planned budget."

Additionally, PacifiCorp's **2025 EOY** provided a territory OPEX and HFTD OPEX actual value expenditure for WP-01 and WP-02 of \$998 (\$ thousand) and \$631 (\$ thousand) respectively.

5.8.3 Identifying and Evaluating Mitigation Initiatives (WP-02)

5.8.3.1 Initiative Review

Section 7.1.4.1 of PacifiCorp’s **2025 WMP** describes how the company identifies and evaluates potential mitigations. Identifying mitigation pilots and possible programs sometimes requires an evaluation of current industry practices and technology utilized. PacifiCorp has relationships with other utilities across multiple states and discusses industry practices with them to learn from their experiences. The company uses these learnings as well as learnings from completed projects and programs to evaluate proven solutions. Where feasible, PacifiCorp evaluates multiple mitigation options to ensure that the solution ultimately selected is the most cost-effective relative to the risk reduced. Where there is limited information on a possible mitigation, PacifiCorp may undertake a pilot to evaluate the cost-effectiveness of a possible solution before determining whether it should be applied more widely.

While this initiative did have a budgeted spend for 2025, which was recorded in the **2025 EOY** and was corroborated via the **2025 EC AIR**, it did not have a quantitative or qualitative target for the same period. As such, the IE did not perform a detailed review of WP-02 as part of the 2025 Independent Evaluation.

5.8.3.2 Funding Verification

PacifiCorp’s **2025 EC AIR** provided a projected budget of \$280 (\$ thousand) and an actual budget of \$18 (\$ thousand) for a percent difference of -94%. PacifiCorp’s variance explanation was as follows:

“PacifiCorp’s 2025 actual expenditure for WP-02 (Identifying and Evaluating Mitigation Initiatives) was lower than the planned budget because spending on the drone pilot program in 2025 was less than anticipated in the **2025 WMP Update**. As a result, actual costs attributed to this initiative were below the planned level.”

Additionally, PacifiCorp’s **2025 EOY** provided a territory OPEX and HFTD OPEX actual value expenditure for WP-01 and WP-02 of \$998 (\$ thousand) and \$631 (\$ thousand) respectively.

5.8.4 Synthesis of Findings

5.8.4.1 Initiative Review

Neither initiative in the “Wildfire Mitigation Plan Strategy Development” category had a quantitative or qualitative target for 2025. As such, the IE did not perform a detailed review of these initiatives, nor were they reviewed in the 2024 WMP IE ARC.

5.8.4.2 Funding Verification

Initiative ID	Initiative	Planned Spend (\$ Thousands)	Actual Spend (\$ Thousands)	Variance	Variance Description ⁵⁹
WP-01	Wildfire Mitigation Strategy Development	\$845	\$980	16%	PacifiCorp's 2025 actual expenditure for WP-01 (Wildfire Mitigation Strategy Development) exceeded the planned budget due to organizational changes in wildfire mitigation planning. During 2025, PacifiCorp reorganized staff supporting wildfire mitigation strategy development and adjusted how planning-related costs were allocated across the company's service territories. These changes resulted in a greater share of wildfire mitigation planning costs attributed to this initiative than was assumed in the 2025 WMP Update used to establish the planned budget.
WP-02	Identifying and Evaluating Mitigation Initiatives	\$280	\$18	-94%	PacifiCorp's 2025 actual expenditure for WP-02 (Identifying and Evaluating Mitigation Initiatives) was lower than the planned budget because spending on the drone pilot program in 2025 was less than anticipated in the 2025 WMP Update . As a result, actual costs attributed to this initiative were below the planned level.

⁵⁹ The Office of Energy Infrastructure Safety does not require variance descriptions for absolute variances less than 10%.

6. Evaluation of QA/QC Programs

The following assessment is based on the IE's review of PacifiCorp's QA/QC programs through a review of PacifiCorp's **2025 WMP**, data previously submitted to Energy Safety, and information obtained through data requests.

6.1 Description of QA/QC Programs

PacifiCorp has separate QA/QC programs for its Asset Inspection and Vegetation Management programs. These programs are each administered independently by the respective program teams.

Asset Inspections

For QA/QC of asset inspections, PacifiCorp has the following key program components as described in response to *DR 12* Question 4 and documented in PacifiCorp's **Overhead Detailed Inspection Program Audit Process** (DEC 2024), and **Exhibit M.07 - PP Performance Requirements for Inspect Test** (Dec 2024), supporting the **2025 WMP**

The QA/QC process follows a 2-tier process. One for Consultants and one for PacifiCorp staff as described in its **Overhead Detailed Inspection Program Audit Process** (Dec 2024):

- *Tier 1* requires contractors to QA/QC audit a minimum of 5% of the total poles scheduled by PacifiCorp for the calendar year. The audits are performed on a computer-generated random 5% sample chosen within a completed section and performed on a weekly basis.
- *Tier 2* of the process is run by PacifiCorp staff, which reviews an additional 2-3% of inspections on top of the 5% performed in Tier 1. Approximately half of the audit sample is derived from those reviewed in Tier 1 and half are randomly chosen.

These QA/QCs previously established a pass rate of 90% conformance for urban areas and 80% for rural areas. However, for 2025, additional PacifiCorp program documentation was developed and increased the pass rate to 95% for both urban and rural areas in California, specifically. Although not captured as part of the **2025 WMP** it is captured in the QA/QC program document performance requirements **Exhibit M.07 - PP Performance Requirements for Inspect Test** (Dec 2024).

Vegetation Management

The following review is based on PacifiCorp's response to *DR 1* question 14, *DR3* Questions 22 & 23, *DR 4* Question 16 & 17, and *DR 12* Questions 4 regarding its Vegetation Management (VM) QA/QC program, which included program

documentation, audit work orders and results, and descriptions of responses provided by PacifiCorp.

The main program documents for the VM QA/QC program is the Transmission & Distributions Vegetation Management Program Standard Operating Procedure in document **SOP_08292024.pdf** (Aug 2024), **PacifiCorp_QAQC_Program_Guidelines_v2.pdf (Dec 2025)**, and the **2025 WMP**.

There are two distinct processes that are generally employed in a QA/QC program. A QA/QC program includes both **quality assurance**, which evaluates whether the overall vegetation management process is effective and compliant from start to finish, and **quality control**, which checks completed work against an established standard.

PacifiCorp's **2025 WMP** includes only high-level descriptions regarding VM QA/QC, while there is also a brief description in PacifiCorp's Transmission and Distribution Program Vegetation Management Standard Operating Procedures (**SOP_08292024.pdf**), which was provided in response to *DR 1* Question 14. These two documents conflict with each other and do not clearly state any procedures.

As noted in previous independent evaluations, PacifiCorp did not appear to have a well-defined vegetation management QA/QC program in place in 2025. A review of the data request responses indicate that comprehensive QA/QC procedures have not been fully developed and corresponding training has yet to be implemented.

The IE found that PacifiCorp's QA/QC documentation does not provide sufficient or consistent procedures. The materials describe QA/QC as occasional and left to the foresters discretion, which conflicts with the **2025 WMP**'s statement that post-audits occur annually/Materials focus more on general crew safety than on vegetation management practices tied to wildfire risk reduction, and lack clear criteria or direction for evaluating post-work vegetation clearance, verification of risk tree identification or removal, or any vegetation management actions directly tied to wildfire mitigation.

The overall maturity of the QA/QC program is unchanged relative to 2024, with the exception of the development of established program requirements for contractors specific to asset inspection audits. Documentation provided to the IE does not demonstrate significant progress or improvements that would reflect a more mature QA/QC program, especially where there have been no program updates for the vegetation management QA/QC program. This is a continued concern year-over-year. These concerns have been raised by the IE in previous evaluations and it does not appear that any significant improvement has been made in this area. As a result, the IE has concluded that PacifiCorp's QA/QC program needs improvement to increase the program's effectiveness and establish a coherent, clear, and effective vegetation management QA/QC process that would result in a reduction to wildfire risk in this area.

The IE notes that PacifiCorp uses its Mobile Data Management Software (MDMS) to record inconsistencies with PacifiCorp's specifications or missed work (exceptions). The audit exceptions are visible to the vegetation management contractors within the MDMS.

Vegetation Management QA/QC pass rate information for 2025 was provided by PacifiCorp in response to *DR 12 Questions 1-4* and *DR 13 Question 2*. The pass rate was calculated by identifying the number of locations identified where vegetation maintenance was needed and the number of locations where a non-billable audit exception was found.

Asset Inspections

Table 3 - Asset Inspection QA/QC Program Pass Rate 2025

Activity	Target Pass Rate	Actual Pass Rate
Patrol Inspections	95%	99%
Detailed Inspections	90% Urban, 80% Rural	98.40%
Intrusive Inspections	90% Urban, 80% Rural	99%
Desktop Audit	75% or greater	79.34%

Vegetation Management

Table 4 - Vegetation Management QA/QC Program Pass Rate 2025

Activity	Target Pass Rate	Actual Pass Rate
Routine Cycle Maintenance (Detailed) - Distribution	95%	96%
Annual Corrective Work (Patrol) - Distribution	95%	97%
Pole Clearing Beyond PRC 4292	95%	93%
Routine Maintenance (Detailed) - Transmission	95%	94%
Annual Corrective Work (Patrol) - Transmission	95%	96%

6.2 Five Dimensions of QA/QC Framework Ratings and Assessment

6.2.1 QA/QC Roles and Responsibilities

0 – Not Implemented	1 – Initiated	2 – Applied	3 – Routine	4 – Mastered
• No formal definition or documentation of roles or responsibilities. • Individuals perform QA/QC tasks without clear guidance or accountability. • Communication is informal and inconsistent, leading to misunderstandings and gaps in QA/QC efforts. • Minimal to no involvement of leadership in defining or supporting QA/QC roles and activities.	• Basic definitions exist of roles but are not standardized or fully integrated in the company hierarchy. • Awareness of QA/QC tasks lies with those involved in the program, but accountability is still unclear. • Semi-formal communication channels exist but are not regularly used or monitored. • Leadership recognizes the importance of QA/QC, but provides limited support to the program.	• QA/QC program has defined and documented roles and responsibilities. • Individuals understand their specific QA/QC responsibilities and are held accountable. • Formal communication channels are established promoting the flow of QA/QC information. • Leadership is active in defining and supporting QA/QC roles.	• Roles and responsibilities are integrated within organizational WMP processes and are aligned with WMP objectives. • Robust mechanisms ensure accountability. • Effective and regular communication regarding QA/QC occurs up and down the organization. • Strong leadership support for QA/QC roles and responsibilities through regular reviews and feedback.	• Roles and responsibilities are continuously reviewed and optimized to improve WMP QA/QC effectiveness. • Organization wide understanding of WMP QA/QC efforts and proactive accountability. • Highly effective, transparent, proactive, and uninterrupted communication and access to senior management regarding QA/QC issues. • Leadership champions a culture of quality, driving continuous improvement and innovation in QA/QC roles.

Roles & Responsibilities Rating = 1 Initiated

PacifiCorp staff have some awareness of QA/QC tasks, basic definitions of roles exist, and semi-formal communication channels exist. This remains unchanged from the 2024 IE review.

6.2.2 QA/QC Quality Culture

0 – Not Implemented	1 – Initiated	2 – Applied	3 – Routine	4 – Mastered
- Employees can't explain the impact of their work on the QA/QC of WMP initiatives, nor can they explain impact of bad quality, they do not know main quality issues. - EC has no formal training program or documentation for QA/QC activities.	- When asking employees about the impact of their work on quality, they can explain impact of bad quality. - Main quality issues are known, but fear of reporting failures to supervisors/managers. - EC provides basic QA/QC onboarding training to employees participating in QA/QC activities.	- Key QA/QC characteristics are known by employees; some failures or problems are reported to managers/supervisors. - Quality is an inherent part of the company vision. - EC provides robust QA/QC onboarding training to employees and contractors conducting QA/QC activities.	- Employees report failures/problems in a standard way proactively to managers with first suggestions for improvements. - Employee suggestions for quality management are appreciated. - EC conducts QA/QC refresher training for employees and contractors involved in QA/QC activities.	- Employees proactively search for feedback in all functions. - In particular, quality expectations/issues are communicated seamlessly throughout the organization. - Onboarding and refresher trainings are mandatory and conducted multiple times per year; lessons learned from QA/QC activities are incorporated into future QA/QC employee/contractor trainings.

Quality Culture Rating = 1 Initiated

PacifiCorp understands the impact of their work on quality, main quality issues are known, and PacifiCorp provides basic QA/QC training, specifically with the GO 95 Training Guide. This remains unchanged from the 2024 IE review.

6.2.3 QA/QC Quality Management System

0 – Not Implemented	1 – Initiated	2 – Applied	3 – Routine	4 – Mastered
- QMS is basic and primarily paper-based, with work orders, operations and procedures manually documented. - Processes are inconsistent and not formalized. - Data management is fragmented with few digital records.	- System uses basic digital tools like spreadsheets and databases. - Processes are not fully formalized. - Basic tools for data logging and centralization.	- QMS is fully digitized with standard formats for documentation. - Processes are standardized and procedures are enforced. - Centralized digital data repository for all QA/QC data enables easy access and retrieval and enables more sophisticated quality inspections and checks.	- QMS is an advanced digital documentation system with integration capabilities across the EC. - Processes are optimized and integrated continuous improvement mechanisms. - Robust data management systems with analytical capabilities enable performance monitoring and metrics to include real-time monitoring and reporting.	- Advanced QMS software leveraging AI/ML for document management, compliance, and efficiency. - Processes are highly optimized and refined via data-driven process improvement from analytical insights. - Integrated data management platform conducts analysis to develop insights and predictive analytics of quality performance.

Quality Management System Rating = 1 Initiated

PacifiCorp uses basic digital tools for data logging and centralization. QA/QC processes are not fully formalized. This remains unchanged from the 2024 IE review.

6.2.4 QA/QC Quality Inspections/Audits

0 – Not Implemented	1 – Initiated	2 – Applied	3 – Routine	4 – Mastered
Inspections not conducted frequently enough to ensure QA/QC.	- Inspections are conducted frequently enough to meet the minimum requirement to ensure QA/QC. - Results from inspections and audits are not used to improve WMP processes. - Quality of inspection is assessment through SME review annually.	- Inspections are conducted more frequently in high-risk areas. - Results from inspections and audits are reviewed to make ad hoc corrections. - Quality of inspection is assessed through SME review at least annually.	- Inspections are conducted based up-to-date information to determine high-risk areas and predictive modeling. - Results from inspections and audits are used to identify deficiencies and weaknesses. - Quality of inspection is assessed through SME review at least twice per year.	- Inspections are conducted based on real-time, dynamic updates to identify the highest risk areas, predictive modeling, and analytics to identify areas of concern. - Results from inspections and audits are used to improve WMP processes, procedures, and trainings. - Quality of inspection is assessed through SME review at least four times per year.

Quality Inspections/Audits Rating = 2 Applied

PacifiCorp conducts inspections more frequently in high-risk areas, the results from inspections and audits are reviewed to make ad hoc corrections, and quality of inspection is assessed at least annually.

6.2.5 QA/QC Technology Adoption

0 – Not Implemented	1 – Initiated	2 – Applied	3 – Routine	4 – Mastered
• QA/QC process are manual and do not leverage technology to improve efficiency. • High potential for human error and inconsistencies.	• Basic usage of handheld technology (e.g. tablets, cameras, GPS trackers) to improve efficiency in data collection. • Reduced human error and improved standardization in data collection. • Some exploration of additional tools that could assist in field inspections.	• Introduction of drones and basic LiDAR technology for inspections. • Reduce need to travel to remote field locations, enhanced efficiency with automated data collection and improved accuracy leveraging high resolution imagery and precise measurements. • Proactive adoption of technology for specific use cases in QA/QC.	• Extensive use of drones, LiDAR, and initial use of space-based-sensors for inspections. • High efficiency through automation of complex inspection processes and data analysis. Use of technology minimizes human error and increases accuracy. Integrate data management with near/ real-time collection. • Continuous improvement mindset with regular updates and integration of new technologies.	• Cutting-edge technology, including AI-driven autonomous drones, advanced LiDAR, and space-based sensors for comprehensive inspections. • Maximum efficiency gained through automation and reduced requirements to travel to field locations. Near-perfect accuracy through real-time monitoring and predictive analysis through advanced sensors. • Culture of innovation, consistently adopting and developing new technologies for incorporation.

QA/QC Technology Adoption Rating = 1 Initiated

PacifiCorp's QA/QC includes basic usage of handheld technology to improve efficiency in data collection, reduce human error, and standardize data collection. PacifiCorp is exploring additional tools to assist in field inspections.

6.3 QA/QC Maturity Overview Sunburst Chart



6.4 QA/QC Recommendations

Roles & Responsibilities

- Formally document and define QA/QC program roles, responsibilities, and lines of accountability across the Wildfire Mitigation Plan (WMP). This could be accomplished by enhancing the current Asset Inspection and Vegetation Management QA/QC program documents or by developing a comprehensive QA/QC program document that covers PacifiCorp's collective WMP QA/QC framework.
- Establish a regular review cycle to evaluate and update documented QA/QC roles and responsibilities so that accountabilities remain aligned with program changes and lessons learned.
- Conduct recurring WMP QA/QC meetings or information sessions with subject matter experts, field personnel, and contractors to reinforce expectations, review responsibilities, and clarify escalation and communication when QA/QC issues are identified.

Quality Culture

- Develop formal QA/QC onboarding and refresher training for PacifiCorp employees and contractors and require completion before personnel perform WMP-related work, inspections, or audits.

- Create overarching WMP QA/QC program documentation that communicates the purpose, value, and expectations of QA/QC activities, while clearly describing how each role contributes to overall outcomes and wildfire risk reduction.
- Promote a culture of continuous improvement by encouraging personnel to raise QA/QC concerns, share field observations, and participate in corrective action development. This includes capturing recurring issues and determining root causes.

Quality Management System

- Continue developing standardized, digitized, and automated formats for QA/QC, audit, and inspection documentation to improve consistency, traceability, and reporting efficiency across WMP activities.
- Develop a centralized repository for all QA/QC data, replacing dispersed spreadsheets and fragmented storage locations. The repository should consolidate data from the Asset Inspection and Vegetation Management QA/QC programs and support version control, trend analysis, and management reporting.
- Establish routine data quality checks to confirm that QA/QC records are complete, accurate, timely, and usable for oversight and decision-making.

Quality Inspections/Audits

- Use the results of inspections and audits to identify root causes, improve WMP processes and procedures, refine training content, and prioritize areas of elevated concern or recurring deficiency.
- Increase the frequency of subject matter expert reviews for inspections and audits, particularly for high-risk work, repeat findings, and areas where documentation quality or field execution has shown variability.
- Track inspection and audit findings through corrective action closure to ensure issues are resolved, trends are monitored, and improvements are sustained over time.

QA/QC Technology Adoption

- Consider additional technologies that improve inspection coverage, documentation quality, location data, and program oversight, such as drones, LiDAR, and space-based sensors, where appropriate for WMP objectives.
- Adopt automation and digital tools that improve the efficiency, consistency, and traceability of data collection, documentation, and management of findings from audits.
- Consider technology solutions that integrate with QA/QC workflows and data systems to enable timely analysis and reduce manual effort.

7. Conclusion

The IE reviewed the wildfire mitigation initiatives PacifiCorp implemented in 2025. The IE also reviewed evidence to determine whether PacifiCorp met its performance objective targets and whether PacifiCorp is underfunding any of its initiatives. Finally, the IE reviewed evidence to determine whether PacifiCorp is following its QA/QC processes.

The IE used PacifiCorp's **2025 WMP**, **2025 WMP Update**, **2025 Q4 QDR**, and **2025 EC AIR** to identify 49 wildfire mitigation initiatives. To facilitate the review of initiatives, the IE identified 12 Focus Initiatives, 6 Field Verifiable Initiatives, 22 Quantitative Initiatives, and 8 Qualitative Initiatives. The IE determined 19 initiatives did not have an associated Quantitative or Qualitative target. The IE found four initiatives that missed their target. One of the four missed targets resulted in an IE finding of "Initiative Not Validated." The IE found 12 of the 22 Quantitative Initiatives were completed within 5% of the WMP target.

The IE reviewed 46 funding targets as part of the IE evaluation process. The IE found 36 of the funding targets were present in the 2025 EC AIR for Planned vs Actual, Variance, and Variance Explanation evaluation. The IE determined 30 of the 36 funding targets that received the Planned vs Actual, Variance, and Variance Explanation evaluation had funding discrepancies greater than 10% absolute variance.

The IE determined PacifiCorp has separate QA/QC programs for its Asset Inspection and Vegetation Management programs. The IE found that PacifiCorp's QA/QC documentation does not provide sufficient or consistent procedures. Overall, the IE found the maturity of the QA/QC program unchanged relative to 2024. As a result, the IE has concluded that PacifiCorp's QA/QC program needs improvement to increase the program's effectiveness.