PACIFIC POWER
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VIA ELECTRONIC FILING

Docket # 2026-IE

Tony Marino
Director, Electrical Infrastructure Directorate
Office of Energy Infrastructure Safety
715 P Street, 20th Floor
Sacramento, CA 95814

RE: PacifiCorp's Comments on the 2025 Wildfire Mitigation Plan Independent Evaluator Annual Implementation Report

Dear Director Marino:

PacifiCorp d/b/a Pacific Power (PacifiCorp or the company) appreciates the opportunity to comment on the 2025 Wildfire Mitigation Plan Independent Evaluator (IE) Annual Implementation Report (IE Report). The company values the IE's feedback, including its appraisal of PacifiCorp's overall improvement since 2024[1] and its observations regarding opportunities for continued improvement. The company provides the following comments on the IE Report.

Please direct any questions to Pooja Kishore, Regulatory Affairs Manager, at (503) 813-7314.

Sincerely,

Robert Meredith
Director, Regulation

[1] *See* IE Report, 7.

SUMMARY

The IE Report evaluated 49 distinct initiatives in PacifiCorp's 2025 Wildfire Mitigation Plan (WMP) and associated filings, identifying alleged missed targets for four of the company's WMP initiatives.[2] For a fifth initiative, the IE was unable to reach a conclusion and assigned a finding of "Validation Inconclusive."[3] The IE Report also examined the maturity of two of PacifiCorp's quality assurance and quality control (QA/QC) programs, noting opportunities for continued development.

In these comments, PacifiCorp addresses the four missed targets and the inconclusive finding. Consistent with PacifiCorp's comments on last year's IE Report,[4] PacifiCorp believes the four missed targets—related to asset inspections—reflect a common reporting and evaluation dynamic rather than deficiencies in mitigation performance or program execution.

Regarding the initiative that the IE assigned a finding of "Validation Inconclusive," the company discusses its target design and explains why it believes the target was met.

Finally, the company discusses where it believes the IE understated the maturity of one or both of its QA/QC programs and requests clarity concerning the IE's evaluation process for these programs.

RESPONSE TO MISSED TARGETS FOR ASSET INSPECTIONS INITIATIVES AI-03, AI-05, AI-06, AND AI-11

For initiatives AI-03, AI-05, AI-06, and AI-11, the IE found that PacifiCorp conducted fewer asset inspections in 2025 than it initially targeted in its WMP.[5] Table 1-1 of the IE Report summarizes the asset inspection quantitative targets established in the company's 2025 WMP, the number of inspections the company actually conducted in 2025, and PacifiCorp's explanations for the differences between initial targets and 2025 actuals.

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[2] IE Report, 6–8.
[3] *Id.*
[4] *PacifiCorp (U 901-E) Comments on the 2025 Independent Evaluator Annual Report on Compliance* (Aug. 22, 2025), https://brkenergy.sharepoint.com/:b:/r/sites/WildfireMitigationProgramDelivery/Shared Documents/02 - California Filings/02 - Independent Evaluator/2025 (2024 Review)/Filed Comments/TN16627_20250822T113744_2025IE_PacifiCorp_Comments_82225.pdf?csf=1&web=1&e=c2xgPC.
[5] IE Report, 8, Table 1-1.

Despite completing fewer inspections than initially targeted, PacifiCorp considers all of the listed initiatives' targets (AI-03, AI-05, AI-06, and AI-11) to be met. PacifiCorp believes the discrepancy between completed inspections and target inspections to be an artifact of how progress was measured and evaluated, as opposed to a genuine indication of incomplete or unsatisfactory inspections work.

PacifiCorp creates its asset inspection plans by first identifying areas within its system it aims to inspect, including specific transmission lines or one-mile distribution grids. These areas dictate the number and types of inspections targeted each year in the WMP. The active facility points for a given asset type within a target area are tabulated, saved, and used to set quantitative annual inspection targets based on a snapshot in time. For later years in a WMP cycle, these targets are set several years in advance to accommodate multi-year WMP planning requirements.

The 2024 and 2025 IE Reports reveal a recurrent fact: PacifiCorp's inspection performance can appear to fall short of quantitative WMP targets even when inspection work within the designated target areas is complete. Several factors can cause this apparent discrepancy. These factors include assets being retired, asset attributes being corrected or reclassified in the company's mainframe, and system configurations or inspection requirements changing between the time the targets are set and when inspections are conducted. As a result, the company can have fewer assets to inspect than were initially targeted, meaning even if the company inspects every inspectable asset within its target area, it will not meet its initial quantitative target.

As the IE notes in Table 1-1 of the IE Report, initiatives AI-03, AI-05, and AI-06 were all affected by asset retirements or re-classifications, resulting in fewer inspectable assets in 2025 than initially targeted in the WMP. AI-11 was subject to a similar dynamic, whereby one inspection of 451 planned (0.2% of planned inspections) was not conducted in 2025 due to a Western Electricity Coordinating Council (WECC) path change,[6] which was not anticipated when the target was set in 2023.

To help ameliorate recurrent issues associated with the inspections target dynamic described above, the company anticipates changes to target design, reporting, and/or evaluation criteria, and looks forward to working with the California Office of Energy Infrastructure Safety (Energy Safety) to implement appropriate changes in the 2028–2031 WMP.

[6] *Id.*

RESPONSE TO "VALIDATION INCONCLUSIVE" FINDING FOR INITIATIVE VM-05

The IE Report states, "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."[7] The IE appears to characterize the reporting system as confusing because the VM-05 target includes both poles that were inspected and cleared and poles that were inspected but required no work because they were exempt.[8] The IE also identifies apparent errors in the exemption classification of several sampled poles.[9]

Consistent with its response to Data Request 3, PacifiCorp maintains that it met its VM-05 target. The company also explains that its target design helped avoid challenges associated with forecasting future exempt pole counts. Since several grid hardening activities, such as expulsion fuse replacements, can change a pole's exemption classification, forecasting the exact number of non-exempt poles that need to be cleared years in advance to set a vegetation management target is very difficult. By including both non-exempt and exempt poles in the VM-05 target, the company's approach simplifies target design and eliminates a variable that could otherwise affect target attainment, while ensuring that the mitigation purpose of the initiative, clearing the non-exempt poles, is upheld. As such, the company's target design helps maintain a stable pole clearing target between development of the WMP and execution of the work, mitigating an issue the company is experiencing with asset inspections targets, as described in the previous section of these comments.

RESPONSE TO THE IE'S EVALUATION OF QA/QC PROGRAMS

The IE Report evaluated the maturity of the company's asset inspections and vegetation management QA/QC programs, first, individually,[10] and then collectively across five dimensions.[11]

PacifiCorp is concerned that the collective analysis is misleading because the asset inspection and vegetation management QA/QC programs are at different stages of maturity, while the collective analysis seems to focus on the less mature vegetation management program. It is also

[7] IE Report, 71.
[8] *Id.*
[9] *Id.*
[10] IE Report, 123–125.
[11] IE Report, 126–132.

unclear to PacifiCorp how the IE evaluated the five dimensions in its collective analysis, particularly, the "Roles and Responsibilities" and "Quality Culture" dimensions.

Further, PacifiCorp does not believe the three meetings listed in the "SME Interviews" tab of the IE Annual Implementation Report Attachment[12] provided the company sufficient opportunity to discuss its QA/QC programs or describe its practices, some of which align with the recommendations on pages 131–132 of the IE Report. For future evaluations, PacifiCorp would appreciate clearer guidance on how its programs will be evaluated and additional opportunities to discuss those criteria.

Notwithstanding PacifiCorp's concerns, the company appreciates the feedback provided by the IE and is committed to continued improvement of its QA/QC programs.

[12] IE AIR Attachment, available at: https://brkenergy-my.sharepoint.com/:x:/r/personal/john_garrett_pacificorp_com/Documents/TN18310_20260709T162210_PacifiCorp_2025_Independent_Evaluator_Annual_Implementation_Report_IE_AIR_Appendix.xlsx?d=wfb6d55da7b9d4ec3a905491c36888f7d&csf=1&web=1&e=9zF2tA.