PACIFIC POWER.
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VIA OEIS E-FILING

Docket #WMP-Guidelines

Tony Marino
Deputy Director
Office of Energy Infrastructure Safety
715 P Street, 20th Floor
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RE: PacifiCorp Comments on the Office of Energy Safety's July 30, 2026 Public Workshop on Senate Bill 254 Implementation

Dear Deputy Director Marino:

PacifiCorp appreciates the opportunity to seek clarity and discuss practical solutions to outstanding issues leading up to the implementation of Senate Bill (S.B.) 254.

S.B. 254 establishes alignment between a wildfire mitigation plan (WMP) and a general rate case (GRC), such that an electrical corporation (EC) must file a WMP one year in advance of filing a GRC.[1] S.B. 254 also establishes a process and timeline for an EC to amend its WMP to align with a GRC ruling, subject to review by the Office of Energy Infrastructure Safety (Energy Safety).[2]

Historically, PacifiCorp's California GRCs have taken between 19 and 22 months from filing to issuance of a final decision. [3] Under the new framework established by S.B. 254, this timeline could result in approximately 11.5 to 15 months of a WMP execution cycle elapsing before a GRC decision is issued, creating substantial uncertainty regarding cost recovery associated with

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[1] Senate Bill 254 (2025–2026 Reg. Sess. 2025).
[2] *Id.*
[3] PacifiCorp's previous two California GRCs, filed in May 2022 and April 2018, had tracks that took 19 and 22 months respectively from filing to ruling. The May 2022 GRC was split into two tracks. The first track, and only track considered here, was 19 months from filing to ruling. The second track was 33 months from filing to ruling.

the execution of an approved WMP. Figure 1 illustrates a hypothetical WMP and GRC timeline under S.B. 254:

Date		Utility Submission	Energy Safety WMP Review	CPUC GRC Review	WMP Execution Cycle	Regulatory Uncertainty
2028	Jan					
	Feb					
	Mar	2030-2032 WMP Pre-Submission				
	Apr	2030-2032 WMP Filed				
	May					
	Jun					
	Jul		Energy Safety WMP Review			
	Aug					
	Sep					
	Oct					
	Nov					
	Dec					
2029	Jan					
	Feb					
	Mar					
	Apr	GRC Filed				
	May					
	Jun					
	Jul					
	Aug					
	Sep					
	Oct					
	Nov					
	Dec					
2030	Jan					
	Feb			CPUC GRC Review*		
	Mar					
	Apr					
	May					
	Jun					Regulatory Uncertainty: GRC Under Review During Active WMP
	Jul					
	Aug					
	Sep					
	Oct					
	Nov					
	Dec					
2031	Jan					
	Feb					Potential Regulatory Uncertainty: Petition to Amend Process
	Mar					
	Apr					
	May					
	Jun					
	Jul				WMP Execution Cycle	
	Aug					
	Sep					
	Oct					
	Nov					
	Dec					
2032	Jan					
	Feb					
	Mar					
	Apr					
	May					
	Jun					
	Jul					
	Aug					
	Sep					
	Oct					
	Nov					
	Dec					

Figure 1: Hypothetical PacifiCorp WMP and GRC Timeline Under SB 254 Framework

As illustrated in the hypothetical timeline in Figure 1, approximately one third to one half of an Energy Safety-approved three-year WMP cycle could elapse before a decision is issued in the associated GRC and any related WMP amendment process is completed. During this period, the EC would continue implementing an approved WMP while facing significant uncertainty regarding the recovery of associated costs.

Given the magnitude of this regulatory uncertainty, PacifiCorp is interested in exploring options to mitigate and/or manage it. The company is continuing to evaluate the implications of the July 30, 2026, S.B. 254 workshop and assess the opportunities to provide ECs greater flexibility to manage regulatory uncertainty during WMP implementation. Given the inherent complexity of WMP and GRC proceedings, PacifiCorp must carefully consider how best to balance wildfire risk reduction objectives with increased regulatory uncertainty during the period between WMP and GRC approvals.

One potential approach PacifiCorp may support, subject to support from the California Public Utilities Commission (Commission), ECs, and other stakeholders, would be to bifurcate future GRC proceedings into multiple tracks, with wildfire-related costs addressed through an expedited track. Prioritizing review of wildfire-related spend could significantly reduce the period of regulatory uncertainty illustrated in Figure 1 by accelerating decisions regarding cost recovery of approved wildfire mitigation activities.

PacifiCorp believes that important implementation questions regarding S.B. 254 remain unresolved and hopes that continued dialogue between Energy Safety, the California Public Utilities Commission, ECs, and stakeholders will help address concerns before the statute takes effect.

If you have any questions or require additional information, please contact Pooja Kishore, Regulatory Affairs Manager at pooja.kishore@pacificorp.com or 503-813-7314.

Respectfully Submitted,

Melissa J Swenson

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PacifiCorp