

October 8, 2026

Docket #WMP-Guidelines

VIA OEIS E-FILING

Tony Marino
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RE: PacifiCorp's Comments on the Draft Wildfire Mitigation Plan Guidelines and Energy Safety Workshop on September 24, 2026

Dear Deputy Director Marino:

PacifiCorp respectfully submits the following comments regarding the Draft Wildfire Mitigation Plan (WMP) Guidelines (Draft Guidelines) published on September 1, 2026, and discussed during the workshop on September 24, 2026.

Year-four Table Columns for Electric Corporations (EC) with Three-year WMPs

Section 6.1.2, Table 6-1 (and related parts) of the Draft Guidelines has columns for four years of targets. For an electrical corporation (EC) submitting a three-year WMP, PacifiCorp recommends the California Office of Energy Infrastructure Safety (Energy Safety) clarify how the EC should manage the year-four target columns. Should the EC remove the year-four target column or input "N/A" in tables? PacifiCorp recommends allowing ECs to remove the year-four column because this will avoid confusion around N/As or the need to consistently explain them.

Risk Tolerance

Section 8.2.3 of the Draft Guidelines proposes new requirements for an EC to discuss its risk tolerance and "[h]ow it considers risk tolerance as it relates to wildfire mitigation strategy." PacifiCorp is concerned that this requirement is premature given that the California Public Utilities Commission (CPUC) is slated to evaluate risk tolerance in utility planning in Rulemaking 26-04-016, Order Instituting Rulemaking to Refine the Risk-Based Decision-Making Framework for Electric and Gas Utilities, and a proposed decision will not be available until quarter four of 2027.¹ Rather than spur ECs to complete risk tolerance frameworks independently in the next few months when those frameworks likely will not align with those under R.26-04-016, PacifiCorp recommends waiting to require risk tolerance until a decision is made in R.26-04-016 to ensure consistency between the CPUC framework and WMP filings.

¹ [611517101.PDF](#) at 7.

Further, incorporating risk tolerance into WMP strategy may require nuanced understandings of residual risk under a range of mitigation scenarios, which presents several complex risk modeling challenges that would be difficult to address in the months leading up to a Spring 2027 WMP filing deadline. Developing robust solutions to these challenges would benefit from additional time, coordination, and collaboration, all of which will be had in R.26-04-016.

With these considerations in mind, PacifiCorp recommends removing requirements to discuss risk tolerance from Section 8.2.3 or limiting the requirement to higher-level narrative until a decision is reached in R.26-04-016 and ECs have had sufficient time develop risk modeling to address this new requirement.

Target Design Using Pre-Mitigation Circuit Miles

Section 9.1 of the Draft Guidelines states that “Circuit Miles must be the unit used for length. Targets must be based on pre-mitigation miles” and that “[p]re-mitigation miles are the circuit miles of the existing line, circuit segment, or span before the mitigation activity is implemented, including before any mileage changes resulting from reconfiguration, line removal, undergrounding, or conductor replacement.”

PacifiCorp notes a potential issue with target design and achievement under this framework. As acknowledged in the guidelines, the mileage of replacement infrastructure may differ from the mileage of the existing infrastructure being mitigated. If targets are established based on pre-mitigation mileage but progress were to be measured using the mileage of the replacement infrastructure, differences between pre- and post-mitigation lengths could prevent an EC from achieving its target despite fully completing the intended mitigation work.

To avoid this outcome, PacifiCorp requests additional clarification in the guidelines and recommends that progress be reported and measured using the same pre-mitigation mileage basis used to establish targets. Under this approach, covered conductor and undergrounding accomplishments would reflect the circuit miles of pre-existing infrastructure removed or replaced, rather than the circuit miles of replacement infrastructure installed. This would ensure consistency between target-setting and performance measurement.

WMP Notification Language Requirements

Section 12.2.4 of the Draft Guidelines requires “[m]ultilingual communication capabilities, including notifications in English, Spanish, and the top three primary languages used in California.” PacifiCorp is concerned that as phrased, this guideline could drive translation of notifications into the top primary languages spoken in all of California rather than the primary languages spoken in PacifiCorp’s service area in northern California. This discrepancy may limit the relevancy of the translations to PacifiCorp’s customers.

PacifiCorp recommends revising the guideline to focus on communication capabilities for languages that are prevalent in the EC’s service area.

Conclusion

PacifiCorp appreciates the opportunity to provide comments on the Draft Guidelines and at the workshop held on September 24, 2026. If you have questions or require additional information, please contact Melissa.Swenson@PacifiCorp.com.

Sincerely,

/s/Melissa Swenson

Melissa Swenson

Director, Wildfire Mitigation Program Delivery

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