



September 11, 2023

Allen Berreth
Vice President of Transmission and Distribution Operations
PacifiCorp dba Pacific Power
825 NE Multnomah Street, Suite 2000
Portland, OR 97232

SUBJECT: Office of Energy Infrastructure Safety Issuance of Revision Notice for PacifiCorp's 2023-2025 Wildfire Mitigation Plan

Dear Mr. Berreth:

Enclosed is the Office of Energy Infrastructure Safety's (Energy Safety's) Revision Notice for PacifiCorp's 2023-2025 Wildfire Mitigation Plan (Base WMP). This Revision Notice indicates that Energy Safety has identified critical issues associated with PacifiCorp's Base WMP. Critical issues are areas of significant concern that may lead to the denial of a WMP if associated remedies are not satisfactorily addressed by the utility. For each identified critical issue, Energy Safety sets forth the remedy that PacifiCorp must address.

A Revision Notice Response must be submitted by PacifiCorp within 30 days of issuance of this Revision Notice (no later than October 11, 2023). PacifiCorp must provide:

- A response to each critical issue.
- A revised version of its Base Plan, submitted to the 2023-2025 Wildfire Mitigation Plan docket (#2023-2025-WMPs), that includes any changes to the Base WMP resulting from its Revision Notice Response, in both a redlined and a clean version of the document.
- Any auxiliary spreadsheets required as part of the Base WMP submission that incorporate all required changes across all critical issues.

Public Comments

Stakeholders may submit comments on PacifiCorp's Revision Notice Response within 15 days after the publication of PacifiCorp's Revision Notice Response on the 2023-2025 Wildfire Mitigation Plan docket. Reply comments are due 10 calendar days thereafter and must be limited to issues raised and representations made in opening comments of other

stakeholders. As such, opening comments must be submitted no later than October 26, 2023. Reply comments must be submitted no later than November 6, 2023.¹

The Revision Notice Response and public comments must be submitted to the 2023 Wildfire Mitigation Plans docket (#2023-2025-WMPs) via Energy Safety’s e-filing system.² Submitted files must use the naming conventions provided in the 2023 Guidelines.³ For example, “2023-10-11_PacifiCorp_23_RNR_R1,” refers to the PacifiCorp Revision Notice Response submitted on October 11, 2023, revision 1. The redlined version must be named “2023-10-11_PacifiCorp_23_R1_redlined” and the auxiliary Excel file “2023-10-11_PacifiCorp_23_RNR_R1_Tables x-x.”

Schedule

The dates relevant to this Revision Notice are:

Revision Notice issued by Energy Safety	September 11
PacifiCorp Revision Notice Response due	October 11
Opening comments due	October 26
Reply comments due	November 6
Energy Safety Draft Decision issued no later than	January 4, 2024

Energy Safety will consider PacifiCorp’s Revision Notice Response, its revised Base WMP, stakeholder comments, responses to data requests, and the totality of the information before it to date in issuing a determination on PacifiCorp’s Base WMP pursuant to Public Utilities Code sections 8386(b) and 8386.3(a).

Sincerely,

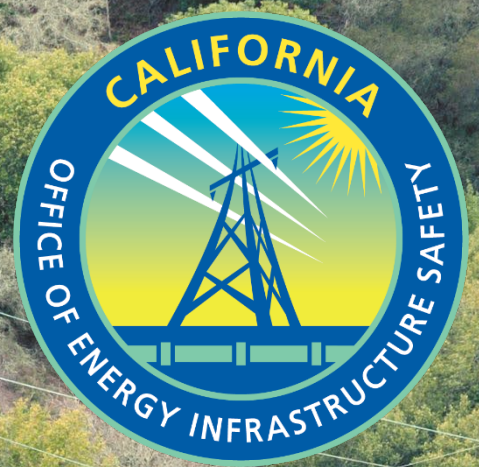


Shannon O’Rourke
Deputy Director | Electrical Infrastructure Directorate
Office of Energy Infrastructure Safety

¹ If any deadline falls on a weekend or holiday as defined in Government Code section 6700, the deadline will be moved to the following business day in accordance with Government Code section 6707.

² Submit comments to [2023 to 2025 Electrical Corporation Wildfire Mitigation Plans docket \(2023-2025-WMPs\)](https://efiling.energysafety.ca.gov/EFiling/DocketInformation.aspx?docketnumber=2023-2025-WMPs) (<https://efiling.energysafety.ca.gov/EFiling/DocketInformation.aspx?docketnumber=2023-2025-WMPs>, accessed August 25, 2023).

³ [Energy Safety's 2023-2025 Wildfire Mitigation Plan Process and Evaluation Guidelines](#) (December 2022), Section 10.6, page 19 (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53287&shareable=true>, accessed August 25, 2023).



OFFICE OF ENERGY INFRASTRUCTURE SAFETY
REVISION NOTICE FOR PACIFICORP'S
2023-2025 WILDFIRE MITIGATION PLAN

September 2023

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1. Introduction

Before approval of an electrical corporation's Wildfire Mitigation Plan (WMP), the Office of Energy Infrastructure Safety (Energy Safety) may require modification of the WMP.¹ Energy Safety effectuates this by issuing a Revision Notice.

This Revision Notice identifies critical issues in PacifiCorp's 2023-2025 Wildfire Mitigation Plan (Base Plan or WMP). Critical issues are defined as areas of significant concern that may lead to the denial of a WMP if associated remedies are not satisfactorily addressed by the utility.² PacifiCorp must address the critical issues set forth in this Revision Notice according to the parameters set forth herein. Section 4 provides submission instructions and deadlines.

¹ [Public Utilities Code section 8386](#)

(https://leginfo.legislature.ca.gov/faces/codes_displaySection.xhtml?sectionNum=8386.&lawCode=PUC, accessed May 30, 2023).

² In this document "utility" should be understood to mean "electrical corporation."

2. Summary of Critical Issues

Where a utility fails to sufficiently address a required element of the WMP as prescribed by Public Utilities Code section 8386, a requirement detailed in Energy Safety's 2023-2025 Wildfire Mitigation Plan Technical Guidelines (Technical Guidelines)³ and the Data Guidelines,⁴ or a specific area for continued improvement outlined in a previous plan approval, it can constitute a critical issue. This section outlines the six critical issues associated with PacifiCorp's Base Plan.⁵ The issues are listed below by mitigation initiative.

Section 3 provides a more detailed explanation of each critical issue and sets out specific remedies. PacifiCorp must demonstrate that it has fully addressed and responded to each remedy in its Revision Notice Response within the specified 30-day timeframe. Failure to respond and fully address Revision Notice remedies within the specified timeframe may result in denial of PacifiCorp's Base Plan.

For the purposes of PacifiCorp's responses and Energy Safety's continued evaluation, the issues are assigned tracking codes.

General

- **RN-PC-23-01:** PacifiCorp does not provide the status of its 2022 areas for continued improvement.

Wildfire Mitigation Strategy Development

- **RN-PC-23-02:** PacifiCorp's mitigation initiative prioritization schematic is missing required details.
- **RN-PC-23-03:** PacifiCorp does not clearly describe its current or future mitigation identification and evaluation procedures.

Grid Design, Operations, and Maintenance

- **RN-PC-23-04:** PacifiCorp has not assigned imminent threat status to any Level 1 conditions found during inspections from 2020 to 2022 and has not maintained compliance with its existing Level 1 work orders.

³ [Energy Safety's 2023-2025 Wildfire Mitigation Plan Technical Guidelines \(Dec. 2022\) \(hereafter Technical Guidelines\)](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53286&shareable=true) (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53286&shareable=true, accessed May 5, 2023).

⁴ [Energy Safety's Data Guidelines, Version 3.1 \(March 2023\)](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53475&shareable=true) (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53475&shareable=true, accessed May 16, 2023).

⁵ [PacifiCorp's 2023-2025 Wildfire Mitigation Plan](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53819&shareable=true) (posted to the 2023-2025-WMPs docket May 8, 2023) (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53819&shareable=true, accessed July 25, 2023).

Vegetation Management and Inspections

- **RN-PC-23-05:** PacifiCorp’s 3-year and 10-year vegetation management objectives do not meet Energy Safety requirements as outlined in the Technical Guidelines.
- **RN-PC-23-06:** PacifiCorp does not provide target pass rates for vegetation management quality assurance and control program as required by the Technical Guidelines.

3. Critical Issues and Required Remedies

3.1 General

3.1.1 **RN-PC-23-01: PacifiCorp does not provide the status of its 2022 areas for continued improvement**

The Technical Guidelines require electrical corporations to provide responses to their areas for continued improvement as identified in Energy Safety’s Decisions on the 2022 WMP Updates.⁶ In Appendix D of its WMP, PacifiCorp does not provide the status of its 2022 areas for continued improvement. Instead, PacifiCorp states that as it identifies areas for continued improvement, an update will be provided.⁷ The Technical Guidelines do not require electrical corporations to identify their own areas for continued improvement. Appendix D is intended for responses to Energy Safety’s areas for continued improvement, as stated above and in the Technical Guidelines. Furthermore, this is not a new requirement; in its 2022 WMP Update,⁸ PacifiCorp was required to address “key areas for improvement” as identified in Energy Safety’s Action Statement on PacifiCorp’s 2021 WMP Update.⁹

⁶ [Technical Guidelines](#), page D-1

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53286&shareable=true>, accessed August 17, 2023).

⁷ PacifiCorp’s 2023-2025 WMP, page 385.

⁸ [PacifiCorp’s 2022 WMP Update](#)

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=52700&shareable=true>, accessed September 6, 2023).

⁹ [Energy Safety’s Revised Final Action Statement on PacifiCorp’s 2021 WMP Update](#)

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=51672&shareable=true>, accessed September 6, 2023).

3.1.1.1 Required Remedies

PacifiCorp must provide a complete Appendix D as directed by the Technical Guidelines. The appendix must list all 2022 areas for continued improvement identified by Energy Safety's Decision on PacifiCorp's 2022 WMP Update.¹⁰ PacifiCorp must provide a response to each of the 2022 areas for continued improvement in the format required by the Technical Guidelines.

3.2 Wildfire Mitigation Strategy Development

3.2.1 RN-PC-23-02: PacifiCorp's mitigation initiative prioritization schematic is missing required details

In its WMP Section 7.1.4.2, Mitigation Initiative Prioritization, PacifiCorp provides a schematic (Figure 7-8 "Current Mitigation Selection Considerations")¹¹ that does not meet the minimum requirements outlined in the Technical Guidelines.¹² At a minimum, the schematic must demonstrate the roles of the following procedures and evaluation criteria used to evaluate and prioritize potential mitigation initiatives:

- Quantitative risk assessment.
- Resource allocation.
- Evaluation of other performance objectives (e.g., cost, timing).
- Subject matter expert judgement.
- Any local factors considered in the decision-making process, if applicable, including details as to why these local conditions are part of the decision process.

PacifiCorp's graphic provides factors PacifiCorp considers when prioritizing mitigation initiatives. However, the graphic is too high level and does not include the minimum details required. The current graphic does not demonstrate what roles the procedures and evaluation criteria listed above play, if any, in this mitigation prioritization process. The graphic simply lists considerations (e.g., "In HFTD," "Mitigate PSPS Impacts") under "Lower Priority" and "Higher Priority" headings without demonstrating any process used to determine these criteria.

¹⁰ [Final Decision on PacifiCorp's 2022 WMP Update](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53298&shareable=true), pages 86-96 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53298&shareable=true, accessed August 17, 2023).

¹¹ PacifiCorp's 2023-2025 WMP, page 119.

¹² [Technical Guidelines](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53286&shareable=true), pages 64-65 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53286&shareable=true, accessed August 10, 2023).

3.2.1.1 Required Remedies

PacifiCorp must revise its schematic (Figure 7-8) to include the necessary details to meet the minimum requirements as outlined in the Technical Guidelines.

3.2.2 RN-PC-23-03: PacifiCorp does not clearly describe its current or future mitigation identification and evaluation procedures

In its WMP Section 7.1.4.1, Identifying and Evaluating Mitigation Initiatives, PacifiCorp does not provide the detail required by the Technical Guidelines¹³ regarding its procedures for identifying and evaluating mitigation initiatives. PacifiCorp is currently developing its risk-spend efficiency (RSE) process and does not yet have RSE calculations.¹⁴ PacifiCorp indicates that it evaluates cost effectiveness when selecting mitigations in the meantime.¹⁵ However, PacifiCorp does not describe its process for performing this interim evaluation. Though PacifiCorp provides examples of how RSE values may be calculated for certain mitigations, it is not clear which of those examples PacifiCorp currently uses, which it intends to adopt in the future, or if these examples are part of how PacifiCorp is currently evaluating cost effectiveness.

Furthermore, PacifiCorp lists criteria that it evaluates when selecting mitigations (e.g., regulatory requirements, customer and other stakeholder input, etc.),¹⁶ but does not provide information on how those criteria are factored into its decision-making process. PacifiCorp also does not describe its approach for characterizing uncertainties and how its decision-making process incorporates these uncertainties.

3.2.2.1 Required Remedies

PacifiCorp must fully respond to the requirements in Section 7.1.4.1 of the Technical Guidelines. Specifically, PacifiCorp must:

1. Clearly describe the procedures PacifiCorp is currently using for identifying and evaluating mitigation initiatives that will be in place until its RSE process is established. This description must include how PacifiCorp considers the criteria listed

¹³ [Technical Guidelines](#), pages 63-64 (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53286&shareable=true>, accessed August 10, 2023).

¹⁴ PacifiCorp's 2023-2025 WMP, page 115.

¹⁵ PacifiCorp's 2023-2025 WMP, page 115.

¹⁶ PacifiCorp's 2023-2025 WMP, page 115.

in its WMP,¹⁷ how those criteria are prioritized and/or combined to inform PacifiCorp’s decision-making process, and any procedures currently employed to determine cost effectiveness relative to risk reduction.

2. Clearly describe the procedures PacifiCorp is considering for future implementation for identifying and evaluating mitigation initiatives once its RSE process is established, including any procedures to determine cost effectiveness relative to risk reduction. PacifiCorp must adapt the illustrative examples it provides in its WMP¹⁸ to make clear the approaches it is exploring implementing or has decided against and why.
3. Clearly list the uncertainties PacifiCorp faces in its risk model or mitigation evaluation, and how it accounts for these uncertainties in its decision-making process.

3.3 Grid Design, Operations, and Maintenance

3.3.1 RN-PC-23-04: PacifiCorp has not assigned imminent threat status to any Level 1 conditions found during inspections from 2020 to 2022 and has not maintained compliance with its existing Level 1 work orders

PacifiCorp has not provided sufficient information for the evaluation of its asset management policy for Level 1 priority work orders.¹⁹ PacifiCorp’s asset management policy states that Level 1²⁰ conditions must be remedied within 30 days unless they are classified as imminent threats, in which case the conditions must be addressed immediately.²¹ From the start of 2020 to the end of 2022, PacifiCorp created 1,075 Level 1 work orders. None of these work

¹⁷ PacifiCorp’s 2023-2025 WMP, page 115.

¹⁸ PacifiCorp’s 2023-2025 WMP, pages 115-118.

¹⁹ [Process Guidelines](#), Section 4.4.1, page 6 (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53287&shareable=true>, accessed May 30, 2023).

²⁰ PacifiCorp refers to Level 1 conditions as “A conditions.” General Order 95 Rule 18 defines Level 1 conditions as an “[immediate] safety and/or reliability risk with high probability for significant impact” that must be corrected immediately.

²¹ [PacifiCorp Asset Management Policy No. 192](#), included in response to Cal Advocates’ Data Request 16, Question 3, page 4 (https://www.pacificorp.com/content/dam/pcorp/documents/en/pacificorp/wildfire-mitigation/responses-issued/PacifiCorp_Response_CalAdvocates-PacifiCorp-2023WMP-16.pdf, accessed August 16, 2023).

orders were categorized as an imminent threat by the inspector.²² Some of these work order findings included damaged or frayed conductor, General Order (GO) 95 clearance conditions, transformer issues, and missing hardware.²³ Such conditions as well as others identified by PacifiCorp as Level 1 priority, could pose wildfire risk and require further evaluation to ensure proper classification. The statistical improbability of encountering no imminent threats over a three-year span suggests a procedural failure to appropriately classify Level 1 conditions.

Additionally, PacifiCorp has not been able to maintain compliance with its existing Level 1 timeline. As of June 12, 2023, PacifiCorp had 16 overdue Level 1 work orders.²⁴ From 2020 to 2022, PacifiCorp had a total of 274 Level 1 priority work orders that were completed after 30 days, with 47 being in the CPUC’s high fire threat district (HFTD) Tier 2 or Tier 3 lands.²⁵ Overall, PacifiCorp needs to evaluate its current procedures and protocols for Level 1 priority work orders to ensure it is maximizing wildfire risk reduction in a timely manner.

3.3.1.1 Required Remedies

PacifiCorp must update its WMP Section 8.2.5, Quality Assurance and Quality Control, to include an outline of an investigative framework to validate that inspections are correctly assigning imminent threat status to Level 1 condition findings. At minimum, this framework and the corresponding outline must include:

²² [PacifiCorp Response to Cal Advocates’ Data Request 14](https://view.officeapps.live.com/op/view.aspx?src=https%3A%2F%2Fwww.pacificorp.com%2Fcontent%2Fdam%2Fpcorp%2Fdocuments%2Fen%2Fpacificorp%2Fwildfire-mitigation%2Fresponses-issued%2FPacifiCorp_Response_CalAdvocates-PacifiCorp-2023WMP-14.1.xlsx&wdOrigin=BROWSELINK)

(https://view.officeapps.live.com/op/view.aspx?src=https%3A%2F%2Fwww.pacificorp.com%2Fcontent%2Fdam%2Fpcorp%2Fdocuments%2Fen%2Fpacificorp%2Fwildfire-mitigation%2Fresponses-issued%2FPacifiCorp_Response_CalAdvocates-PacifiCorp-2023WMP-14.1.xlsx&wdOrigin=BROWSELINK, accessed August 16, 2023).

²³ [PacifiCorp Response to Cal Advocates’ Data Request 14](https://view.officeapps.live.com/op/view.aspx?src=https%3A%2F%2Fwww.pacificorp.com%2Fcontent%2Fdam%2Fpcorp%2Fdocuments%2Fen%2Fpacificorp%2Fwildfire-mitigation%2Fresponses-issued%2FPacifiCorp_Response_CalAdvocates-PacifiCorp-2023WMP-14.1.xlsx&wdOrigin=BROWSELINK) within Colum B “Work Order Description”

(https://view.officeapps.live.com/op/view.aspx?src=https%3A%2F%2Fwww.pacificorp.com%2Fcontent%2Fdam%2Fpcorp%2Fdocuments%2Fen%2Fpacificorp%2Fwildfire-mitigation%2Fresponses-issued%2FPacifiCorp_Response_CalAdvocates-PacifiCorp-2023WMP-14.1.xlsx&wdOrigin=BROWSELINK, accessed August 16, 2023).

²⁴ [CalAdvocates Data Request 13.1](https://www.pacificorp.com/content/dam/pcorp/documents/en/pacificorp/wildfire-mitigation/responses-issued/PacifiCorp_Response_CalAdvocates-PacifiCorp-2023WMP-13.pdf) (Question 5)

(https://www.pacificorp.com/content/dam/pcorp/documents/en/pacificorp/wildfire-mitigation/responses-issued/PacifiCorp_Response_CalAdvocates-PacifiCorp-2023WMP-13.pdf, accessed August 17, 2023).

²⁵ [PacifiCorp Response to Cal Advocates’ Data Request 14](https://view.officeapps.live.com/op/view.aspx?src=https%3A%2F%2Fwww.pacificorp.com%2Fcontent%2Fdam%2Fpcorp%2Fdocuments%2Fen%2Fpacificorp%2Fwildfire-mitigation%2Fresponses-issued%2FPacifiCorp_Response_CalAdvocates-PacifiCorp-2023WMP-14.1.xlsx&wdOrigin=BROWSELINK) comparing Column H “Date the work order was originally opened” to Column P “Date the work order was completed”

(https://view.officeapps.live.com/op/view.aspx?src=https%3A%2F%2Fwww.pacificorp.com%2Fcontent%2Fdam%2Fpcorp%2Fdocuments%2Fen%2Fpacificorp%2Fwildfire-mitigation%2Fresponses-issued%2FPacifiCorp_Response_CalAdvocates-PacifiCorp-2023WMP-14.1.xlsx&wdOrigin=BROWSELINK, accessed August 16, 2023).

- A plan to determine which failure modes can result in imminent threats, particularly relating to wildfire risk, including an evaluation of PacifiCorp’s current list of possible nonconformance criteria²⁶ and associated priority level determination.
- A strategy to perform internal and external audits on statistically relevant sample sizes of inspections that resulted in the selected failure modes. This should include evaluation of the inspectors’ accuracy for determining imminent threat status.
- An evaluation of all Level 1 work orders from 2020 to 2023 to consider whether any could have posed imminent threats and should have been prioritized. This should also include a process to evaluate root cause issues and perform needed solutions to address such issues.
- A description of PacifiCorp’s procedures and capability to perform and track when temporary corrective actions or interim measures have taken place to decrease imminent threats.
- A process to update associated procedures, inspection practices, and training materials to correctly identify imminent threats.

PacifiCorp must also update its WMP Section 8.1.7, Open Work Orders, to include a plan on how it intends to address Level 1 priority work orders in a timely manner. At minimum, this must include:

- Resourcing allocation plans to obtain and/or maintain workforce and equipment needs, including considerations of any supply chain issues.
- How PacifiCorp intends to address and prioritize Level 1 priority work orders based on wildfire risk in the future.
- An update on PacifiCorp’s open Level 1 priority work orders as of the publication of this Revision Notice.
- A plan to perform root cause analysis on the delays PacifiCorp faced resolving Level 1 priority work orders in a timely fashion from 2020 to 2023.

3.4 Vegetation Management and Inspections

3.4.1 RN-PC-23-05: PacifiCorp’s 3-year and 10-year vegetation management objectives do not meet Energy Safety requirements as outlined in the Technical Guidelines

PacifiCorp’s 3-year and 10-year initiative objectives (objectives) for vegetation management do not adequately demonstrate “a clear action plan to continue reducing utility-related

²⁶ See [General Order \(GO\) 95 Rule 18](https://ia.cpuc.ca.gov/gos/GO95/go_95_rule_18) for more information (https://ia.cpuc.ca.gov/gos/GO95/go_95_rule_18.htm, accessed August 22, 2023).

ignitions and the scale, scope, and frequency of Public Safety Power Shutoff (PSPS) events” nor do the objectives “[focus] sufficiently on long-term strategies.”²⁷

In its WMP Section 8.2, Vegetation Management and Inspections, PacifiCorp describes how it will implement and improve its vegetation management program(s) but does not commit to these improvements through its summarization of objectives. Per the Technical Guidelines, objectives must be: “Specific, measurable, achievable, realistic, and timely....”²⁸ Although PacifiCorp provides 3-year and 10-year objectives for vegetation management, the objectives do not meet the stated requirements. Instead, PacifiCorp uses equivocating language such as “continue progressing programs” and “continue to improve.”²⁹ These objectives are neither specific nor measurable.

3.4.1.1 Required Remedies

PacifiCorp must revise its 3-year and 10-year vegetation management objectives to address the issues that Energy Safety identifies above. PacifiCorp may add, modify, and/or remove objectives, as needed, in order to strengthen its 3-year and 10-year objectives to be specific, measurable, achievable, realistic, and timely.

3.4.2 RN-PC-23-06: PacifiCorp does not provide target pass rates for vegetation management quality assurance and control program as required by the Technical Guidelines

PacifiCorp has not provided yearly target pass rates for the current WMP cycle for its vegetation management and inspections quality assurance (QA) and quality control (QC) activities, as required by the Technical Guidelines.³⁰

In Section 8.2.5 of its WMP, Table 8-19 “Vegetation Management QA/QC Program,” PacifiCorp does not provide target pass rates. Instead, PacifiCorp only noted, “N/A,” without any explanation.³¹

²⁷ [Process Guidelines](#), Section 5.1, page 9
(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53287&shareable=true>, accessed May 30, 2023).

²⁸ [Technical Guidelines](#), Appendix A, page A-12
(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53286&shareable=true>, accessed May 30, 2023).

²⁹ PacifiCorp’s 2023-2025 WMP, page 181.

³⁰ [Technical Guidelines](#), Sections 8.1.6 “Quality Assurance and Quality Control,” page 86 and Section 8.2.5 “Quality Assurance and Quality Control,” page 110-111
(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53286&shareable=true>, accessed May 30, 2023).

³¹ PacifiCorp’s 2023-2025 WMP, pages 205-206.

3.4.2.1 Required Remedies

PacifiCorp must define yearly target pass rates for 2023 through 2025 for its vegetation management and inspections QA/QC program in Table 8-19.

4. Conclusion and Next Steps

PacifiCorp must submit its Revision Notice Response to the Energy Safety Deputy Director via email and to the 2023-2025 Wildfire Mitigation Plan docket (#2023-2025-WMPs) via Energy Safety’s e-filing system.³² PacifiCorp must concurrently serve its Revision Notice Response to the California Department of Forestry and Fire Protection (CAL FIRE) at CALFIREUtilityFireMitigationUnit@fire.ca.gov.

PacifiCorp’s Revision Notice Response is due within 30 days of this Revision Notice issuance.

For each of the six critical issues identified, Energy Safety sets forth specific remedies that PacifiCorp must fully address and respond to within its Revision Notice Response. Failure to fully address and respond to each remedy within the Revision Notice Response by the designated date may result in denial of PacifiCorp’s Base Plan. Energy Safety will not accept any updates or errata to the Revision Notice Response after the due date.

Stakeholders may submit opening comments on PacifiCorp’s Revision Notice Response within 15 days of PacifiCorp’s Revision Notice Response. Reply comments are due 10 calendar days thereafter and must be limited to issues raised and representations made in opening comments of other stakeholders. Opening and reply comments must be submitted to the 2023-2025 Wildfire Mitigation Plan docket (#2023-2025-WMPs).^{33, 34}

The dates relevant to this Revision Notice are:

Revision Notice issued by Energy Safety	September 11
PacifiCorp Revision Notice Response due	October 11
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Reply comments due	November 6
Energy Safety Draft Decision issued no later than	January 4, 2024

³² [2023 to 2025 Electrical Corporation Wildfire Mitigation Plans docket \(2023-2025-WMPs\)](https://efiling.energysafety.ca.gov/EFiling/DocketInformation.aspx?docketnumber=2023-2025-WMPs)

(<https://efiling.energysafety.ca.gov/EFiling/DocketInformation.aspx?docketnumber=2023-2025-WMPs>, accessed July 24, 2023).

³³ [2023 to 2025 Electrical Corporation Wildfire Mitigation Plans docket \(2023-2025-WMPs\)](https://efiling.energysafety.ca.gov/EFiling/DocketInformation.aspx?docketnumber=2023-2025-WMPs)

(<https://efiling.energysafety.ca.gov/EFiling/DocketInformation.aspx?docketnumber=2023-2025-WMPs>, accessed July 24, 2023).

³⁴ If any deadline falls on a weekend or holiday as defined in Government Code section 6700, the deadline will be moved to the following business day in accordance with Government Code section 6707.

Energy Safety will consider PacifiCorp's Revision Notice Response, its revised Base Plan, stakeholder comments, responses to data requests, and the totality of the information before it to date in issuing a determination on PacifiCorp's Base Plan pursuant to Public Utilities Code sections 8386(b) and 8386.3(a).

A handwritten signature in black ink, appearing to read "Shannon O'Rourke". The signature is fluid and cursive, with the first name "Shannon" and last name "O'Rourke" clearly distinguishable.

Shannon O'Rourke
Deputy Director | Electrical Infrastructure Directorate
Office of Energy Infrastructure Safety

DATA DRIVEN FORWARD-THINKING INNOVATIVE SAFETY FOCUSED



OFFICE OF ENERGY INFRASTRUCTURE SAFETY
A California Natural Resources Agency
www.energysafety.ca.gov
715 P Street, 20th Floor
Sacramento, CA 95814
916.902.6000

