

April 5, 2024

***VIA OEIS E-FILING***

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**RE: PacifiCorp's Corrective Action Plan on Substantial Vegetation Management Work in 2021**

Dear Director Jacobs:

PacifiCorp d/b/a Pacific Power (PacifiCorp or the Company) provides this 2021 Substantial Vegetation Management Audit Corrective Action Plan (CAP) as requested by Energy Safety in its March 26, 2024, Audit Report on PacifiCorp's 2021 Substantial Vegetation Management Work.

This submission includes PacifiCorp's response to the Office of Energy Infrastructure Safety's two (2) initiatives found to have not been completed during its audit. The Company has responded to each corrective action in this CAP, which is being submitted in the Energy Safety #2021-SVM docket.

If you have any questions regarding this request, please contact Pooja Kishore, Regulatory Affairs Manager at (503) 813-7314.

Sincerely,



Matthew McVee  
Vice President, Regulatory Policy and Operations

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# PacifiCorp 2021 SVM Audit Corrective Action Plan

4/05/24

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# INTRODUCTION

In compliance with the Office of Energy Infrastructure Safety's (OEIS) March 26, 2024 Audit Report on PacifiCorp's Substantial Vegetation Management (SVM) Work in 2021, PacifiCorp submits this Substantial Vegetation Management Audit Response and Corrective Action plan.

# EXECUTIVE SUMMARY

OEIS deemed two initiatives as noncompliant due to insufficiencies identified by OEIS upon analysis of responses to the reviewed documents:

1. PacifiCorp's 2021 Wildfire Mitigation Report Update, revised March 5, 2021.
2. PacifiCorp's notification letter.
3. PacifiCorp's 2021 Quarterly Data Reports for quarters 1, 2, 3, and 4.
4. PacifiCorp's response to Energy Safety's data request DR-116.
5. PacifiCorp's response to Energy Safety's data request DR-131.
6. PacifiCorp's response to Energy Safety's data request DR-133.
7. PacifiCorp's response to Energy Safety's data request DR-198.
8. PacifiCorp's response to Energy Safety's data request DR-211.

The two noncompliant conditions are presented as follows:

**Table 1 : Summary of All Non-Compliances**

| Noncompliant Initiative | Findings   | Corrective Action  | PacifiCorp Response Summary   |
|-------------------------|--|--|---|
| 7.3.5.2                 | PacifiCorp completed 1,471 miles of its target of 1,476 miles of inspections in 2021.        | PacifiCorp completed the remaining five (5) miles in early 2022. Therefore, no corrective action is needed for this missed target. However, PacifiCorp shall confirm that the five (5) remaining miles were not counted towards meeting its 2022 target. | The five (5) miles remaining, associated with circuit 5R152, did not count towards the 2022 detailed inspection target.   |
| 7.3.5.5                 | PacifiCorp completed clearance on 2,872 poles of its target of clearing 3,047 poles in 2021. | PacifiCorp shall<br>a) provide an explanation for why it did not meet its target for pole clearing, and b) detail the steps it is taking to ensure vegetation management operations are consistent with the targets stated in the WMP.                   | <p>a) The number of poles cleared in any given year may fluctuate due to maintenance or larger projects conducted on poles and the equipment thereon. Poles that were cleared in one year may be deemed exempt in a subsequent year due to equipment/hardware replacement. In 2021, contractors were inconsistent in how they were reporting poles completed.</p> <p>b) PacifiCorp has developed a centralized pole clearing tracker to allow improved insight into the status of the program and improved tracking. There are limitations within PacifiCorp's current workflow management software, which can result in future tracking errors, which PacifiCorp is working to address through upgrading its work management vegetation management software.</p> |

# 1 CORRECTIVE ACTIONS: INITIATIVE 7.3.5.2

Table 2 : Summary of Initiative 7.3.5.2 Corrective Action Plan

| Corrective Action # | Description / Deliverables / Response   | Milestone / Due Date  |
|---------------------|---|---|
| 7.3.5.2             | The five (5) miles remaining, associated with circuit 5R152, did not count towards the 2022 detailed inspection target. | Per Office of Energy Infrastructure Safety’s Audit, March 26, 2024, “PacifiCorp is not required to include corrective actions for this initiative in the Corrective Action Plan.” |

## 1.1 RESPONSE TO 7.3.5.2

Within the PacifiCorp 2021 Substantial Vegetation Management Audit Report, Energy Safety reviewed the Contractor Miles Tracker Distribution spreadsheet and, “the audit found PacifiCorp did not provide information consistent with the completion of work related to the inspection of 1,476 miles of the distribution line in 2021.”

The five (5) miles remaining, associated with circuit 5R152, did not count towards the 2022 detailed inspection target even though the work was rolled over and was completed shortly after 2021.



## 2 CORRECTIVE ACTIONS: INITIATIVE 7.3.5.5

**Table 3 : Summary of Initiative 7.3.5.5 Corrective Action Plan**

| Corrective Action # | Description / Deliverables / Response   | Milestone / Due Date   |
|---------------------|---|--|
| 7.3.5.5 (A)         | <ul style="list-style-type: none"> <li>The number of poles cleared in any given year may fluctuate due to maintenance or larger projects conducted on poles and the equipment thereon.</li> <li>Poles that were cleared in one year may be deemed exempt in a subsequent year due to equipment/hardware replacement.</li> <li>In 2021, contractors were inconsistent in how they were reporting poles completed.</li> <li>PacifiCorp acknowledges that tracking of pole clearing actions has been inconsistent during this timeframe and has taken action to address this as discussed in part b) of this response.</li> </ul>  | N/A  |
| 7.3.5.5 (B)         | <ul style="list-style-type: none"> <li>PacifiCorp has developed a centralized pole clearing tracker to allow improved vision into the status of the program and improved tracking.</li> <li>PacifiCorp is tracking additional information including poles cleared, treated, exempt, and customer refusals.</li> <li>This will improve ability to track against the pole clearing target and minimize the potential for the contractor to only report poles worked.</li> <li>There are limitations within PacifiCorp's current workflow management software; to improve tracking capability, PacifiCorp is upgrading its work management vegetation management software (expected to be implemented in 2025).</li> </ul> | <ul style="list-style-type: none"> <li>Centralized Pole Clearing Tracker implemented 2022 (see figure 1. Pole Clearing Tracker).</li> <li>Vegetation Management software upgrade expected implementation in 2025.</li> </ul> |

### 2.1 RESPONSE TO 7.3.5.5A

In the OEIS 2021 SVM, OEIS reviewed 21 spreadsheets from the contractor (provided by PacifiCorp) for circuits where poles were cleared in 2021 and the audit found “PacifiCorp did not provide information consistent with the completion of work (target of 3,047 poles) versus (2,872 poles completed in 2021) related to the expanded pole clearing project.”

The number of poles cleared in any given year may fluctuate due to maintenance or larger

projects conducted on poles and the equipment thereon. Poles that were cleared in one year may be deemed exempt in a subsequent year due to equipment/hardware replacement. The number of poles identified to be cleared under this initiative is based on the previous year, however, may change due to changes in exemption status. In 2021, contractors were inconsistent in how they were reporting poles completed. For example, workers may have only reported poles where they physically conducted pole clearing work and did not report a pole that was deemed exempt; the pole was still reviewed as part of the pole clearing project, but no work was deemed necessary. In 2021, 2,872 poles were reported as cleared by the contractor and documented in PacifiCorp's Vegetation Management (PVM) database. The contractor conducting the work in 2021, also tracked poles completed in a separate spreadsheet that they managed, which is provided as part of this response; refer to *Trees LLC 2021 PC Schedule 10-23-2021*. In this tracker, the contractor indicates that 3,116 poles were completed in 2021. PacifiCorp acknowledges that tracking of pole clearing actions has been inconsistent during this timeframe and has taken action to address this as discussed in part b) of this response.

## **2.2 RESPONSE TO 7.3.5.5B**

PacifiCorp has developed a centralized pole clearing tracker (see Figure 1. Pole Clearing Tracker below) to allow improved insight into the status of the program and improved tracking. PacifiCorp is tracking additional information including poles cleared, treated, exempt, and customer refusals. This will improve the ability to track against the pole clearing target and minimize the potential for the contractor to only report poles worked. There are limitations within PacifiCorp's current workflow management software, which can result in future tracking errors, which PacifiCorp is working to address through upgrading its work management vegetation management software (expected to be implemented in 2025).

Figure 4 : Pole Clearing Tracker

|    | A              | B          | C                | D           | E         | F      | G           | H             | I             | J      | K   | L       | M      |
|----|----------------|------------|------------------|-------------|-----------|--------|-------------|---------------|---------------|--------|-----|---------|--------|
| 1  | Through WE1224 |            |                  |             |           | Totals | 26,226      | 23,065        | 2,427         | 3      | 199 | 2,587   | (372)  |
| 2  | State          | Forester   | Contractor       | District    | Work Code | Feeder | Total Poles | Total Cleared | Total Treated | Exempt | VMA | Refusal | Remain |
| 3  | OR             | Kelley     | Mtn. Enterprises | Enterprise  | FDP       | 4W8    | 87          | 73            | -             | -      | -   | 14      | -      |
| 4  | OR             | Kelley     | Mtn. Enterprises | Enterprise  | FDP       | 5W21   | 91          | 85            | -             | -      | -   | 6       | -      |
| 5  | OR             | Housholder | Mtn. Enterprises | Hood River  | FDP       | 5K70   | 294         | 222           | -             | -      | -   | 72      | -      |
| 6  | OR             | Housholder | Mtn. Enterprises | Hood River  | FDP       | 5K74   | 85          | 40            | -             | -      | -   | 45      | -      |
| 7  | WA             | Housholder | Mtn. Enterprises | Yakima      | DPL       | 4Y1    | 204         | 196           | -             | -      | -   | 8       | -      |
| 8  | OR             | Hooley     | Mtn. Enterprises | Grants Pass | FDP       | 5R63   | 952         | 813           | -             | -      | -   | 139     | -      |
| 9  | OR             | Hooley     | Mtn. Enterprises | Grants Pass | FDP       | 5R331  | 57          | 19            | -             | -      | -   | 38      | -      |
| 10 | OR             | Hooley     | Mtn. Enterprises | Grants Pass | FDP       | 5R334  | 350         | 324           | -             | -      | -   | 26      | -      |
| 11 | OR             | Hooley     | Mtn. Enterprises | Grants Pass | FDP       | 5R62   | 1,051       | 916           | -             | -      | -   | 135     | -      |
| 12 | OR             | Hooley     | Mtn. Enterprises | Grants Pass | FDP       | 5R121  | 288         | 191           | -             | -      | -   | 97      | -      |
| 13 | OR             | Hooley     | Mtn. Enterprises | Grants Pass | FDP       | 5R82   | 24          | 14            | -             | -      | -   | 10      | -      |
| 14 | OR             | Hooley     | Mtn. Enterprises | Grants Pass | FDP       | 5R98   | 9           | 8             | -             | -      | -   | 1       | -      |
| 15 | OR             | Hooley     | Mtn. Enterprises | Grants Pass | FDP       | 5R99   | 82          | 69            | -             | -      | -   | 13      | -      |
| 16 | OR             | Hooley     | Mtn. Enterprises | Grants Pass | FDP       | 5R104  | 33          | 26            | -             | -      | -   | 7       | -      |
| 17 | OR             | Hooley     | Mtn. Enterprises | Grants Pass | FDP       | 5R114  | 362         | 315           | -             | -      | -   | 47      | -      |
| 18 | OR             | Hooley     | Mtn. Enterprises | Grants Pass | FDP       | 5R115  | 44          | 44            | -             | -      | -   | -       | -      |
| 19 | OR             | Hooley     | Mtn. Enterprises | Grants Pass | FDP       | 5R123  | 28          | 25            | -             | -      | -   | 3       | -      |
| 20 | OR             | Hooley     | Mtn. Enterprises | Grants Pass | FDP       | 5R125  | 48          | 37            | -             | -      | -   | 11      | -      |
| 21 | OR             | Hooley     | Mtn. Enterprises | Grants Pass | FDP       | 5R172  | 319         | 238           | -             | -      | -   | 81      | -      |
| 22 | OR             | Hooley     | Mtn. Enterprises | Grants Pass | FDP       | 5R173  | 212         | 193           | -             | -      | -   | 19      | -      |
| 23 | OR             | Hooley     | Mtn. Enterprises | Grants Pass | FDP       | 5R267  | 659         | 567           | -             | -      | -   | 92      | -      |
| 24 | OR             | Hooley     | Mtn. Enterprises | Grants Pass | FDP       | 5R278  | 776         | 671           | -             | -      | -   | 105     | -      |
| 25 | OR             | Hooley     | Mtn. Enterprises | Grants Pass | FDP       | 5R77   | 412         | 287           | -             | -      | -   | 125     | -      |