

August 6, 2024

***VIA OEIS E-FILING***

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**RE: PacifiCorp's Corrective Action Plan on Substantial Vegetation Management Work in 2022**

Dear Director Jacobs:

PacifiCorp d/b/a Pacific Power (PacifiCorp or the Company) provides this 2022 Substantial Vegetation Management Audit Corrective Action Plan (CAP) as requested by Energy Safety in its July 17, 2024 Audit Report on PacifiCorp's 2022 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 #2022-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 2022 SVM Audit Corrective Action Plan

August 6, 2024



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# INTRODUCTION

In compliance with the Office of Energy Infrastructure Safety's (Energy Safety) July 17, 2024, Audit Report on PacifiCorp's Substantial Vegetation Management (SVM) Work in 2022, PacifiCorp submits this Substantial Vegetation Management Audit Response and Corrective Action plan.

# EXECUTIVE SUMMARY

The Energy Safety audit of the 19 applicable vegetation management initiatives found two initiatives where PacifiCorp "did not perform all required work" due to being "unable to provide supporting documentation or information consistent with statements and/or targets." The initiatives are presented as follows:

- Substation Inspection; 7.3.5.17
- Vegetation Management System; 7.3.5.19

# 1 INITIATIVE 7.3.5.17 – AUDIT FINDING A.17

## **Initiative 7.3.5.17 Substation Inspections**

The purpose of this initiative is to inspect “vegetation surrounding substations.”

### **Audit Statements, Supporting Information and Analysis, and Conclusions**

**Statement 39:** “PacifiCorp performs regular inspections on all substations. Substations within the HFTD are inspected for vegetation annually and other substations are inspected biannually.”

**Supporting Information and Analysis:** PacifiCorp provided an Excel file documenting its monthly inspections of substations completed in 2022. In most cases, substations within both the HFTD and non-HFTD were inspected monthly. PacifiCorp reports a total number of substations as 61. Energy Safety requested the number of annual inspections on substations within the HFTD, as well as biannual inspections on other substations. PacifiCorp stated it conducted 28 substation inspections in the HFTD and 27 substation inspections in the non-HFTD in 2022. Based on the total number of 61 Substations and the completion of work at 55 substations, this leaves six substations that are not accounted for in the inspection table. As a result, Energy Safety finds that PacifiCorp did not complete all the work for substation inspections.

**Conclusion:** PacifiCorp did not provide information consistent with the completion of work identified in this statement.

**Finding:** PacifiCorp did not provide information consistent with the completion of work identified in Initiative 7.3.5.17: Substation Inspections.

## **1.1 PACIFICORP RESPONSE TO 7.3.5.17**

The purpose of this initiative is to inspect vegetation surrounding substations. Energy Safety’s audit stated that PacifiCorp did not provide sufficient supporting documentation indicating inspection of vegetation around the perimeter of subject substations.

PacifiCorp contends that the intent of this initiative was met through implementing other initiatives. As part of PacifiCorp’s best practices and consistent with PacifiCorp’s Standard Operating Procedures Section 2.6, PacifiCorp conducts review or inspection of vegetation around the perimeter of a substation in conjunction with vegetation inspections associated with vegetation maintenance, including detailed and patrol inspections. In addition, PacifiCorp conducts post-audits of vegetation maintenance activities, which effectively serves as an additional inspection and includes review of vegetation around the perimeter of substations.

Therefore, through completing or substantially completing the following initiatives, PacifiCorp contends that the intent of initiative 7.3.5.17 was met:

- 7.3.5.2 Detailed inspections and management practices for vegetation clearances around distribution electrical lines and equipment
- 7.5.3.3 Detailed inspections and management practices for vegetation clearances around transmission electrical lines and equipment
- 7.5.3.11 Patrol inspections of vegetation around distribution electric lines and equipment
- 7.5.3.12 Patrol inspections of vegetation around transmission electric lines and equipment
- 7.5.3.13 Quality assurance / quality control of vegetation management

PacifiCorp provides attachment *2022\_Contractor\_Miles\_Tracker\_CA*, as supporting documentation indicating completion of detailed and patrol inspection initiatives.

- Initiative 7.3.5.2
  - Worksheet “Internal Tracker – Dist Program”
  - Detailed inspection associated with distribution is assigned work code “DNT”
  - Filtering column Q by color (yellow) allows for comparison of miles scheduled (Column P, cell P2) to miles completed/inspected (Column Q, cell Q2)
- Initiative 7.5.3.3
  - Worksheet “Internal Tracker – Trans”
  - Detailed inspections associated with transmission are assigned work codes “TNT” and “MGI”
  - Adding miles completed/inspected of these two work codes (cell Q2 plus cell R2) allows for comparison to miles scheduled (cell P2). Note: plan for transmission line CRE668087 was adjusted to 20 miles scheduled due to environmental restrictions. In order to address this, portions of this line will be worked annually.
- Initiatives 7.5.3.11 and 7.5.3.12
  - Worksheet “Internal Tracker – F Codes”
  - Patrol inspections associated with distribution and transmission are assigned work code “FIN”
  - Miles scheduled (cell P2) can be compared to miles completed/inspected (cell Q2)

As noted in response to OEIS DR-228 question 58, PacifiCorp acknowledges that inspections of vegetation around the perimeter of a substation is not tracked discretely from other inspection initiatives conducted by the vegetation management department. PacifiCorp does identify and correct vegetation along the perimeter of substations when identified and provided such supporting documentation in response to question 58 of OEIS DR-228.

To gain more transparency regarding completion of initiative 7.3.5.17, PacifiCorp will evaluate the feasibility of tracking vegetation inspections conducted by the vegetation management

department or their contractors of vegetation along the perimeter of subject substations. This will be evaluated as part of PacifiCorp's vegetation maintenance work management software project that will develop and transition to new work management tool. This project is currently underway, and a rollout of updated tool is anticipated in Q2 2025.

## 2 INITIATIVE 7.3.5.19: AUDIT FINDING A.19

### **Initiative 7.3.5.19 Vegetation Management System**

The purpose of this initiative is that "Inputs, operation, and support for a centralized vegetation management enterprise system updated based upon inspection results and management activities such as trimming and removal of vegetation.

### **Audit Statements, Supporting Information and Analysis, and Conclusions**

**Statement 41:** "PacifiCorp began implementing more detailed records system in 2020 and have implemented updates to the forms and information collected for 2022...The company also began characterizing general vegetation location and volume near assets using publicly available data on tree canopy and more specific information from remote sensing pilot programs."

**Supporting Information and Analysis:** PacifiCorp updated various forms – including its Inventory, Work Completed, Alder, Audit Exception, and Property Owner Refusal Forms – in 2022 to collect additional information, such as identified species and work codes. PacifiCorp also developed new forms, such as the facility point inspection (FPI) Form, which tracks the correction of vegetation conditions identified during FPI. Further, PacifiCorp transitioned its Crew Visits, Safety Inspection, and Tree Coupon forms from paper-based forms to electric versions.

Additionally, PacifiCorp stated it incorporated publicly available data in its Localized Risk Assessment Model (LRAM) to characterize general vegetation location and volume near assets in 2022. Although PacifiCorp provided a user guide of the LRAM, which stated, "tree canopy coverage was integrated into the fire risk model", PacifiCorp admitted it could not provide additional clarification regarding its statement. The user guide provides instructions for using the model but is not itself evidence that PacifiCorp used the model. Further, PacifiCorp could not provide any documents indicating that it used the model.

**Conclusion:** PacifiCorp did not provide information consistent with the completion of work identified in this statement.

**Finding:** PacifiCorp did not provide information consistent with the completion of work identified in Initiative 7.3.5.17: Substation Inspections.



## 2.1 PACIFICORP RESPONSE TO 7.3.5.19

The purpose of this initiative is that inputs, operation, and support for a centralized vegetation management enterprise system updated based upon inspection results and management activities such as trimming and removal of vegetation. OEIS determined because of their audit that PacifiCorp did not provide sufficient supporting documentation indicating completion of this initiative.

PacifiCorp contends that the intent of this initiative has been met through the implementation of the Company's vegetation maintenance work management tool in 2020 and continued refinement of the tool since. In addition, although PacifiCorp was unable to provide additional clarification regarding tree canopy coverage being integrated within the fire risk model, specifically LRAM, beyond what has been provided, PacifiCorp provides attachment *Overhang Reduction Pilot Study\_Correspondence*, to address OEIS statement "PacifiCorp could not provide any documents indicating that it used the model" within the 2022 Substantial Vegetation Management Audit report (page A-33). The *Overhang Reduction Pilot Study\_Correspondence* attachment is an internal email from 2022 sent during development of the overhang reduction pilot study and provides documentation of LRAM use. The LRAM tool was referenced during identification of potential areas to implement the pilot study.