



September 6, 2024

Melissa Swenson
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Portland, OR 97232

Subject: Rejection and Order to Resubmit for the PacifiCorp 2025 Wildfire Mitigation Plan Update

Ms. Swenson:

The Office of Energy Infrastructure Safety (Energy Safety) rejects the PacifiCorp 2025 Wildfire Mitigation Plan Update (2025 WMP Update) submission dated July 8, 2024,¹ and orders PacifiCorp to resubmit its 2025 WMP Update, including redlined and clean versions of all required components,² pursuant to Public Utilities Code section 8386.3(a). PacifiCorp's 2025 WMP Update does not conform to the submission requirements outlined in Energy Safety's 2025 WMP Update Guidelines³ and a conforming plan must be submitted before Energy Safety can perform its substantive evaluation.

By September 20, 2024, PacifiCorp must file a 2025 WMP Update submission that conforms to the requirements in Energy Safety's 2025 WMP Update Guidelines, corrects any non-substantive errata listed herein and incorporates its non-substantive errata filed with Energy Safety.⁴

Opening comments on PacifiCorp's resubmitted 2025 WMP Update are due by October 2, 2024. Energy Safety will consider all comments submitted in response to the PacifiCorp 2025 WMP Update in its evaluation, including comments submitted for the initial July 8, 2024, version. Stakeholders may submit additional comments in response to the resubmitted

¹ [PacifiCorp 2025 Wildfire Mitigation Plan Update](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56987&shareable=true)

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56987&shareable=true>, accessed Aug. 2, 2024).

² [Energy Safety 2025 Wildfire Mitigation Plan Update Guidelines \(adopted Jan. 2024, published Feb. 2024\)](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56254&shareable=true) pp. 3-4

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56254&shareable=true>, accessed Aug. 2, 2024).

³ [Energy Safety 2025 Wildfire Mitigation Plan Update Guidelines \(adopted Jan. 2024, published Feb. 2024\)](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56254&shareable=true)

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56254&shareable=true>, accessed Aug. 2, 2024).

⁴ [PacifiCorp Non-Substantive Errata \(Aug. 19, 2024\)](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57218&shareable=true)

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57218&shareable=true>, accessed Sep 5, 2024).

PacifiCorp 2025 WMP Update. Reply comments are due by October 7, 2024, and must be limited to issues raised and representations made in the opening comments of other stakeholders. Opening and reply comments must be submitted to the 2023-2025 Wildfire Mitigation Plan docket (#2023-2025-WMPs).⁵ Energy Safety's 2023-2025 WMP Process and Evaluation Guidelines provide more information on submitting opening and reply comments.⁶

Sincerely,



Tony Marino

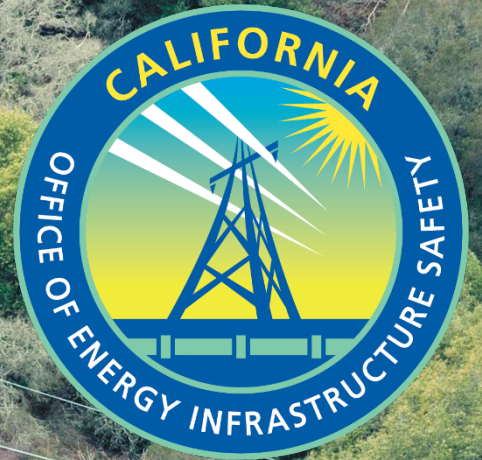
Acting Deputy Director | Electrical Infrastructure Directorate

Office of Energy Infrastructure Safety

Encl: Rejection and Order to Resubmit for the PacifiCorp 2025 Wildfire Mitigation Plan Update

⁵ Submit comments to Energy Safety's e-filing system to the [2023-2025-WMPs docket](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 23, 2024).

⁶ [Energy Safety's 2023-2025 Wildfire Mitigation Plan Process and Evaluation Guidelines \(Revised\) \(adopted Jan. 2024, published Feb. 2024\)](#), Section 6, pp. 10-12 (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56255&shareable=true>, accessed Aug. 2, 2024).



OFFICE OF ENERGY INFRASTRUCTURE SAFETY
**REJECTION AND ORDER TO
RESUBMIT**
PACIFICORP
2025 WILDFIRE MITIGATION PLAN UPDATE

September 6, 2024

1. Introduction

The Office of Energy Infrastructure Safety (Energy Safety) rejects the PacifiCorp 2025 Wildfire Mitigation Plan Update (2025 WMP Update) submission dated July 8, 2024.¹

PacifiCorp's 2025 WMP Update does not conform to the requirements in Energy Safety's 2025 WMP Update Guidelines.² Consequently, Energy Safety rejects PacifiCorp's 2025 WMP Update.

PacifiCorp must provide a 2025 WMP Update submission, with all required components (redline and clean) that conforms to the requirements in Energy Safety's 2025 WMP Update Guidelines and corrects the non-substantive errata listed. Section 4 of this document provides instructions and deadlines for PacifiCorp's resubmission.

¹ [PacifiCorp 2025 Wildfire Mitigation Plan Update \(hereafter PacifiCorp 2025 WMP Update\)](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56987&shareable=true)
(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56987&shareable=true>, accessed Aug. 2, 2024).

² [Energy Safety 2025 Wildfire Mitigation Plan Update Guidelines \(adopted Jan 2024, published Feb. 2024\)](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56254&shareable=true)
([hereafter 2025 WMP Update Guidelines](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56254&shareable=true))
(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56254&shareable=true>, accessed Aug. 2, 2024).

2. Non-Conforming Elements

PacifiCorp’s 2025 WMP Update does not conform to the submission requirements provided in Energy Safety’s 2025 WMP Update Guidelines. The following list outlines the requirements that PacifiCorp’s 2025 WMP Update submission did not follow, as well as some specific examples of items PacifiCorp improperly omitted from its 2025 WMP Update or did not address correctly in its 2025 WMP Update and/or its revised 2023-2025 Base WMP. Additionally, the list includes examples of substantive errors in PacifiCorp’s 2025 WMP Update submission. This is not a comprehensive list.

1. PacifiCorp must either identify and justify additional mitigation initiatives in Section 4 of its 2025 WMP Update or remove additional mitigation initiatives from its revised 2023-2025 Base WMP. PacifiCorp added mitigation initiatives to its revised 2023-2025 Base WMP without identifying and justifying them as new programs in its 2025 WMP Update.³ For example:
 - a. In its revised 2023-2025 Base WMP, Section 7.1.4.2 “Mitigation Initiative Prioritization,” PacifiCorp introduced changes to a table, stating, “Additional mitigation measures have been added to the table to reflect the full suite of mitigations Pacific Power may consider.”⁴ PacifiCorp added 20 mitigation initiatives⁵ to this table. Updates to this table must directly tie to updates provided in PacifiCorp’s 2025 WMP Update.⁶
2. PacifiCorp must either identify and justify additional mitigation initiatives in Section 4 of its 2025 WMP Update and add the additional mitigation initiatives to its revised 2023-2025 Base WMP or remove additional mitigation initiatives from its 2025 WMP Update. For example:
 - a. In its 2025 WMP Update, Section 2.1 “2025 Targets or Target Completion Dates,” PacifiCorp requested to update the target for Active Wildfire De-Energization.⁷ This initiative activity is not discussed in PacifiCorp’s approved

³ [2025 WMP Update Guidelines](#), p. 20
(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56254&shareable=true>, accessed Aug. 26, 2024).

⁴ [PacifiCorp 2023-2025 Base WMP \(redlined version\)](#), p. 136
(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56991&shareable=true>, accessed Aug. 11, 2024).

⁵ [PacifiCorp 2023-2025 Base WMP \(redlined version\)](#), pp. 137-141
(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56991&shareable=true>, accessed Aug. 11, 2024).

⁶ [2025 WMP Update Guidelines](#), p. 3
(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56254&shareable=true>, accessed Aug. 26, 2024).

⁷ [PacifiCorp 2025 WMP Update](#), p. 14
(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56987&shareable=true>, accessed Aug. 2, 2024).

2023-2025 Base WMP nor is it identified as a new program in its 2025 WMP Update.⁸

3. PacifiCorp must remove its requests to add objectives to RA-01: Risk and Risk Component Calculation, from Section 2.1.1. An electrical corporation may not add or delete 3- and 10-year objectives set forth in its approved 2023-2025 Base WMP.⁹ For example:
 - a. In its 2025 WMP Update, Section 2.1.1 “Initiative Objectives,” PacifiCorp listed two “Updated Forecasted Completion Date[s]” for initiative ID RA-01: Risk and Risk Component Calculation.¹⁰ Initiative RA-01: Risk and Risk Component Calculation, however, does not have approved 3- or 10-year objectives.
4. The electrical corporation must submit a redlined version of its revised 2023-2025 Base WMP showing all proposed updates to its approved 2023-2025 Base WMP.¹¹ PacifiCorp included reportable updates in its revised 2023-2025 Base WMP submissions that are not discussed in its 2025 WMP Update; and discussed reportable updates in its 2025 WMP Update that are not reflected in its revised 2023-2025 Base WMP. PacifiCorp must ensure that 2025 WMP Update and redlined and clean versions of its 2023-2025 Base WMP both reflect any proposed reportable updates and may not contain inconsistencies such as:
 - a. In its 2025 WMP Update, PacifiCorp updated its end of year targets for AI-05: Transmission Intrusive Pole Inspections and GH-01: Line Rebuild – Covered conductor installation¹² that are not included in its revised 2023-2025 Base WMP.¹³
 - b. PacifiCorp provided target changes to initiatives AI-08: Enhanced IR Inspections in Distribution Lines, AI-11: Substation Inspections, and VM-11:

⁸ [PacifiCorp 2025 WMP Update](#), p. 20

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56987&shareable=true>, accessed Aug. 2, 2024) and [Energy Safety Decision on PacifiCorp 2023-2025 Wildfire Mitigation Plan \(Feb. 12, 2024\)](#) (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56309&shareable=true>, accessed Sep 3, 2024).

⁹ [2025 WMP Update Guidelines](#), p. 13

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56254&shareable=true>, accessed Aug. 2, 2024).

¹⁰ [PacifiCorp 2025 WMP Update](#), p. 15

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56987&shareable=true>, accessed Aug. 2, 2024).

¹¹ [2025 WMP Update Guidelines](#), p. 4

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56254&shareable=true>, accessed Aug. 23, 2024).

¹² [PacifiCorp 2025 WMP Update](#), p. 14

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56987&shareable=true>, accessed Aug. 2, 2024).

¹³ [PacifiCorp 2023-2025 Base WMP \(redlined version\)](#), pp. 153, 340

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56991&shareable=true>, accessed Aug. 11, 2024).

- Quality Assurance / Quality Control in its revised 2023-2025 Base WMP that were not discussed in its 2025 WMP Update.¹⁴
- c. In its 2025 WMP Update, PacifiCorp provided Quarterly Inspection Targets for 2025 for AI-12: Quality Assurance Quality Control,¹⁵ but there is no corresponding target revision in PacifiCorp's revised 2023-2025 Base WMP.¹⁶
 - i. If PacifiCorp considers initiative AI-12: Quality Assurance Quality Control an inspection target, it must include the corresponding target values in its revised 2023-2025 Base WMP (e.g., in "Table 8-4 Asset Inspection Targets by Year").
 - ii. If PacifiCorp does not consider initiative AI-12: Quality Assurance Quality Control an inspection target, PacifiCorp must remove information for AI-12: Quality Assurance Quality Control from its Quarterly Inspection Targets for 2025 in its 2025 WMP Update.
 5. An electrical corporation must report qualifying changes to targets and must define quarterly targets for 2025 asset and vegetations inspections.¹⁷ In addition, the electrical corporation must report any changes to forecasted initiative objective completion dates.¹⁸ For example:
 - a. In response to an Energy Safety Data Request,¹⁹ PacifiCorp indicated that some of the 2025 targets it reported in its 2025 WMP Update are still being developed. PacifiCorp must report its firm and committed 2025 targets, in both its 2025 WMP Update and in its revised 2023-2025 Base WMP.
 - b. PacifiCorp updated its objective completion dates for two VM-11: Quality Assurance / Quality Control initiatives ("Create SME process & procedure for VM database review four times a year" and "Develop audits to provide understanding of the data collection process") from December 2024 to

¹⁴ [PacifiCorp 2023-2025 Base WMP \(redlined version\)](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56991&shareable=true), pp. 153-154, 207 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56991&shareable=true, accessed Aug. 11, 2024) and [PacifiCorp 2025 WMP Update](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56987&shareable=true), p. 19 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56987&shareable=true, accessed Aug. 2, 2024).

¹⁵ [PacifiCorp 2025 WMP Update](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56987&shareable=true), p. 19 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56987&shareable=true, accessed Aug. 2, 2024).

¹⁶ [PacifiCorp 2023-2025 Base WMP \(redlined version\)](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56991&shareable=true), pp. 153-154 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56991&shareable=true, accessed Aug. 11, 2024).

¹⁷ [2025 WMP Update Guidelines](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56254&shareable=true), p. 15 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56254&shareable=true, accessed Aug. 2, 2024).

¹⁸ [2025 WMP Update Guidelines](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56254&shareable=true), p. 13 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56254&shareable=true, accessed Aug. 2, 2024).

¹⁹ Data Request [OEIS-P-WMP 2024-PC-02](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57193&shareable=true), Question 5 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57193&shareable=true, accessed Aug. 15, 2024).

“Deferred” in its 2025 WMP Update.²⁰ In response to an Energy Safety Data Request, PacifiCorp informed Energy Safety that the “forecasted completion date is Q4 2025”²¹ for those initiatives. PacifiCorp must provide correct updated completion dates in its 2025 WMP Update and revised 2023-2025 Base WMP.

6. PacifiCorp must provide progress on its areas for continued improvement within its 2025 WMP Update.²² In its 2025 WMP Update, PacifiCorp primarily referenced its revised 2023-2025 Base WMP for the full extent of responses to areas for continued improvement. PacifiCorp may not simply reference its revised 2023-2025 Base WMP to address areas of continued improvement. For example:
 - a. In response to PC-23-04, PacifiCorp stated, “As documented in Section 6.2.2.3 Technosylva, the model vendor, performs the calculation of the model attributes shown in Table 6-4 – FireSight Attributes.”²³
 - b. In response to PC-23-05, PacifiCorp stated, “Pacific Power has identified two internal projects to meet this requirement that are described in detail in Section 6.7.”²⁴
7. PacifiCorp must use specified table formats.²⁵ PacifiCorp’s tables are mislabeled and incomplete. For example:
 - a. The table PacifiCorp provided in response to Table 3-1 is missing a title, columns and rows, and data and units.
 - b. The tables required in the 2025 WMP Update Guidelines (Table 1-1, Table 1-2, and Table 3-1) must be numbered and titled according to the 2025 WMP Update Guidelines. PacifiCorp may number and title any tables in addition to the required tables as it sees fit.

²⁰ [PacifiCorp 2025 WMP Update](#), p. 15

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56987&shareable=true>, accessed Aug. 2, 2024) and [PacifiCorp 2023-2025 Base WMP \(redlined version\)](#), p. 205

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56991&shareable=true>, accessed Aug. 11, 2024).

²¹ Data Request [OEIS-P-WMP_2024-PC-01](#), Question 1

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57091&shareable=true>, accessed Aug. 15, 2024).

²² [2025 WMP Update Guidelines](#), p. 17

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56254&shareable=true>, accessed Aug. 2, 2024).

²³ [PacifiCorp 2025 WMP Update](#), p. 24

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56987&shareable=true>, accessed Aug. 2, 2024).

²⁴ [PacifiCorp 2025 WMP Update](#), p. 24

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56987&shareable=true>, accessed Aug. 2, 2024).

²⁵ “Table 3-1: Asset Inspections and Vegetation Management Targets for 2025.” [2025 WMP Update Guidelines](#), p. 15 (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56254&shareable=true>, accessed Aug. 2, 2024).

8. PacifiCorp’s 2023-2025 Base WMP must be consistent in indicating all proposed and potential work into the newly defined HFRA. PacifiCorp established its high fire risk area (HFRA) in Q4 2023.²⁶ PacifiCorp’s revised 2023-2025 Base WMP inconsistently describes what work will occur within its newly defined HFRA. For example:
 - a. The table on page 137 of PacifiCorp’s revised 2023-2025 Base WMP indicates that GH-05: Expulsion Fuse Replacements, may occur in the high fire threat district (HFTD), HFRA, and non-HFTD/HRFA.²⁷ However, the discussion of Expulsion Fuse Replacements states “To the extent that Pacific Power establishes an HFRA...”²⁸
 - b. The table on page 137 of PacifiCorp’s revised 2023-2025 Base WMP indicates that VM-04: Vegetation Inspections: Patrol Inspection - Transmission may occur in the HFTD, HFRA, and non-HFTD-HRFA. However, on page 220, the description of Frequency Triggers for VM-04: Vegetation Inspections: Patrol Inspection - Transmission states, “Patrol inspections or ‘readiness patrols’ are conducted annually on the portion of the transmission line **within the HFTD** on lines that are not scheduled for detailed inspections.”²⁹ [Emphasis added.]
 - c. PacifiCorp’s revised 2023-2025 Base WMP, Section 5.4.3.2 “Social Vulnerability and Exposure to Electrical Corporation Wildfire Risk,” states that “Figure 5-20 shows the location of the HFRA...”³⁰ Figure 5-20, however, does not include the HFRA.
9. PacifiCorp must include in its revised 2023-2025 Base WMP both the original top 5 percent risk circuit table “Table 6-7 Summary of Top Risk Circuits, Segments, or Spans” from its approved 2023-2025 Base WMP and an updated table.
 - a. PacifiCorp’s revised 2023-2025 Base WMP (redlined version) provides a redlined “Table 6-7 Summary of Top-Risk Circuits, Segment, or Spans.”³¹ PacifiCorp must include in its revised 2023-2025 Base WMP both the original top 5 percent risk circuit table “Table 6-7 Summary of Top Risk Circuits, Segments, or Spans”

²⁶ [PacifiCorp 2023-2025 Base WMP \(redlined version\)](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56991&shareable=true), p. 111
(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56991&shareable=true>, accessed Aug. 15, 2024).

²⁷ [PacifiCorp 2023-2025 Base WMP \(redlined version\)](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56991&shareable=true), p. 137
(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56991&shareable=true>, accessed Aug. 15, 2024).

²⁸ [PacifiCorp 2023-2025 Base WMP \(redlined version\)](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56991&shareable=true), p. 163
(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56991&shareable=true>, accessed Aug. 15, 2024).

²⁹ [PacifiCorp 2023-2025 Base WMP \(redlined version\)](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56991&shareable=true), p. 220
(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56991&shareable=true>, accessed Aug. 15, 2024).

³⁰ [PacifiCorp 2023-2025 Base WMP \(redlined version\)](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56991&shareable=true), pp. 60-61
(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56991&shareable=true>, accessed Aug. 15, 2024).

³¹ [PacifiCorp 2023-2025 Base WMP \(redlined version\)](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56991&shareable=true), p. 105
(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56991&shareable=true>, accessed Aug. 11, 2024).

from its approved 2023-2025 Base WMP and an updated table showing the top 5 percent risk circuit tables titled “Table 6-7.B Summary of Top-Risk Circuits, Segments, or Spans – Updated” showing the updated segment ranking provided in PacifiCorp’s 2025 WMP Update. In the redlined version, Table 6-7.B must be shown as a tracked addition. Table 6-7 must be included unchanged from PacifiCorp’s approved 2023-2025 Base WMP.

3. Non-substantive Errata

Below are non-substantive errata that PacifiCorp must correct in its 2025 WMP Update and revised 2023-2025 Base WMP in its response to this Rejection and Order to Resubmit. The list includes examples of non-substantive errors in PacifiCorp’s 2025 WMP Update submission. This is not a comprehensive list.

2025 WMP Update

1. There are numerous hyperlink errors that say “Error! Reference source not found.”³²
2. There are numerous incorrect references to PacifiCorp’s revised 2023-2025 Base WMP as the “2025 WMP Update” (e.g., “As discussed in Section 7.1.3 of the 2025 WMP Update” should say, “As discussed in Section 7.1.3 of the revised 2023-2025 Base WMP.”) or “2025 Update”.³³
3. Where PacifiCorp copied language directly from the Update Guidelines as introductions to its sections, footnote numbers 2 and 3, 6 and 7, and 15 from the Guidelines remain.³⁴
4. The bottom-right note of “Table 3: HFTD and HFRA Overhead Line Miles” includes a typographic error: “Totals may not foot due to rounding.”³⁵
5. For the table in Section 2.1.1 “Initiative Objectives,” column header “Initiative Activity” is mislabeled.³⁶
6. Initiative title “Install Wildfire Detection Cameras” is missing its initiative ID “SA-04.”³⁷

³² [PacifiCorp 2025 WMP Update](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56987&shareable=true) (e.g., pp. 4, 9, and 11) (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56987&shareable=true, accessed Aug. 2, 2024).

³³ [PacifiCorp 2025 WMP Update](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56987&shareable=true) (e.g., pp. 11, 12 and 15) (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56987&shareable=true, accessed Aug. 2, 2024).

³⁴ [PacifiCorp 2025 WMP Update](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56987&shareable=true), pp. 3, 10, and 21 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56987&shareable=true, accessed Aug. 2, 2024).

³⁵ [PacifiCorp 2025 WMP Update](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56987&shareable=true), p. 9 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56987&shareable=true, accessed Aug. 2, 2024).

³⁶ [PacifiCorp 2025 WMP Update](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56987&shareable=true), p. 15 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56987&shareable=true, accessed Aug. 2, 2024).

³⁷ [PacifiCorp 2025 WMP Update](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56987&shareable=true), p. 16 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56987&shareable=true, accessed Aug. 2, 2024).

7. The header for column five in the table under Section 2.1.2 “Expenditure Changes,” contains two dollar signs.³⁸
8. In Section 2.1.2 “Expenditure Changes,” for the table, column “Difference %,” PacifiCorp miscalculates the percentage change for GH-01: Line Rebuild - Covered conductor.³⁹
9. In Section 4 “New or Discontinued Programs,” the “Page Number(s)” for initiatives SA-03: Smoke and Air Quality Sensors and GH-12: Microgrids are incorrect.⁴⁰

Revised 2023-2025 Base WMP

10. The figure “2020-2025 Planned and Actual Combined WMP Expenditure,” is missing a figure label, year (x-axis), and series labels.⁴¹
11. A space is missing for “Figure 7-2Table 7-2.”⁴²
12. For “Figure 7-2Table 7-2,” it appears that the reference should be to “Table 7-2” only.⁴³
13. In Section 7.1.4.2 “Mitigation Initiative Prioritization,” a reference is missing in “Section [Reference].”⁴⁴
14. The subsection numbering under Section 8.1.2.7 “Microgrids” is incorrect.⁴⁵

³⁸ [PacifiCorp 2025 WMP Update](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56987&shareable=true), pp. 16-17 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56987&shareable=true, accessed Aug. 2, 2024).

³⁹ [Comments of the Green Power Institute on the Group 2 2025 Wildfire Mitigation Plan Updates](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57183&shareable=true), p. 7 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57183&shareable=true, accessed Aug. 27, 2024) and [PacifiCorp 2025 WMP Update](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56987&shareable=true), p. 17 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56987&shareable=true, accessed Aug. 27, 2024).

⁴⁰ [PacifiCorp 2025 WMP Update](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56987&shareable=true), p. 20 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56987&shareable=true, accessed Aug. 2, 2024).

⁴¹ [Comments of the Green Power Institute on the Group 2 2025 Wildfire Mitigation Plan Updates](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57183&shareable=true), p. 2 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57183&shareable=true, accessed Aug. 27, 2024) and [PacifiCorp 2023-2025 Base WMP \(redlined version\)](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56991&shareable=true), p. 31 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56991&shareable=true, accessed Aug. 27, 2024).

⁴² [PacifiCorp 2023-2025 Base WMP \(redlined version\)](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56991&shareable=true), p. 124 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56991&shareable=true, accessed Aug. 15, 2024).

⁴³ [PacifiCorp 2023-2025 Base WMP \(redlined version\)](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56991&shareable=true), p. 124 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56991&shareable=true, accessed Aug. 15, 2024).

⁴⁴ [PacifiCorp 2023-2025 Base WMP \(redlined version\)](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56991&shareable=true), p. 135 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56991&shareable=true, accessed Aug. 15, 2024).

⁴⁵ [PacifiCorp 2023-2025 Base WMP \(redlined version\)](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56991&shareable=true), p. 161 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56991&shareable=true, accessed Aug. 15, 2024).

15. In its 2025 WMP Update, PacifiCorp stated that it will discontinue initiative SA-03, Smoke and Air Quality Sensors Program.⁴⁶ Language about discontinuing the program was also included in its revised 2023-2025 Base WMP.⁴⁷ However, a row for the Smoke and Air Quality Sensors Program remains in Table 8-29 Fire Detection Systems Currently Deployed.⁴⁸
16. Section 8.4.2 “Emergency Preparedness Plan,” states “which could after.” “After” does not appear to be the correct word.⁴⁹
17. “Table 8-39 Pacific Power’s Personnel Training Program” states, “trained in accordance with CA OEIS curriculum,” appears to be the incorrect referenced curriculum.⁵⁰
18. “Table 10-1 Lessons Learned,” row 8, columns 5 and 6, states “endure,” which does not appear to be the correct word.⁵¹
19. PacifiCorp submitted its revised 2023-2025 Base WMP (redlined version) with deleted text in the margins. Sometimes the deleted text in the margin does not point to the correct place from where the text was taken. In its revised 2023-2025 Base WMP (redlined version), PacifiCorp is asked to provide a revised 2023-2025 Base WMP redline with all deletions in strikethrough and in-line with the text instead of in the margins.
 - a. It is standard for all deleted text, which must correspond to an update presented in PacifiCorp’s 2025 WMP Update, be in ~~strikethrough~~ in PacifiCorp’s revised 2023-2025 Base WMP (redlined version).
 - b. It is standard for all new text, which must correspond to an update presented in PacifiCorp’s 2025 WMP Update, be underlined in PacifiCorp’s revised 2023-2025 Base WMP (redlined version).

⁴⁶ [PacifiCorp 2025 WMP Update](#), p. 20

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56987&shareable=true>, accessed Aug. 2, 2024).

⁴⁷ [PacifiCorp 2023-2025 Base WMP \(redlined version\)](#), p. 244

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56991&shareable=true>, accessed Aug. 11, 2024).

⁴⁸ [PacifiCorp 2023-2025 Base WMP \(redlined version\)](#), p. 244

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56991&shareable=true>, accessed Aug. 11, 2024).

⁴⁹ [PacifiCorp 2023-2025 Base WMP \(redlined version\)](#), p. 276

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56991&shareable=true>, accessed Aug. 11, 2024).

⁵⁰ [PacifiCorp 2023-2025 Base WMP \(redlined version\)](#), p. 285

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56991&shareable=true>, accessed Aug. 11, 2024).

⁵¹ [PacifiCorp 2023-2025 Base WMP \(redlined version\)](#), p. 350

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56991&shareable=true>, accessed Aug. 11, 2024).

4. Conclusion and Next Steps

PacifiCorp must submit 2025 WMP Update required components (redline and clean) to Energy Safety's 2023-2025 WMP docket that conforms to Energy Safety's 2025 WMP Update Guidelines and corrects the non-substantive errata listed, pursuant to the schedule below. PacifiCorp's resubmitted 2025 WMP Update will be the subsequent version of its 2025 WMP Update submission and must be named accordingly, e.g., PacifiCorp 2025 WMP Update R1 and revised 2023-2025 Base WMP R5 (redlined and clean).

Opening and reply comments on PacifiCorp's resubmitted 2025 WMP Update must be provided in accordance with Energy Safety's 2023-2025 WMP Process and Evaluation Guidelines. For PacifiCorp only (not for other Group 2 electrical corporations), the schedule below supersedes the schedule published by Energy Safety on June 21, 2024.⁵²

The schedule for this Rejection and Order to Resubmit is as follows:

PacifiCorp's Resubmitted 2025 WMP Update due:	September 20, 2024
Opening Comments Due on PacifiCorp's 2025 WMP Update:	October 2, 2024
Reply Comments Due on PacifiCorp's 2025 WMP Update:	October 7, 2024
Draft Decision on PacifiCorp's 2025 WMP Update issued no later than:	December 31, 2024

PacifiCorp's submission of a 2025 WMP Update that conforms with the submission instructions in Energy Safety's 2025 WMP Update Guidelines does not guarantee the approval of PacifiCorp's 2025 WMP Update.

⁵² [Revised Schedule for Group 1 Electrical Corporation 2025 WMP Updates \(Jun. 21, 2024\)](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56875&shareable=true) (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56875&shareable=true, accessed Aug. 27, 2024).

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