



September 25, 2024

To:

Allen Berreth
VP of T&D Operations
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SUBJECT: Office of Energy Infrastructure Safety’s Report on PacifiCorp’s 2022 Substantial Vegetation Management Audit

Pursuant to the requirements of California Public Utilities Code section 8386.3(c)(5)(C), the Office of Energy Infrastructure Safety (Energy Safety) completed its final report on PacifiCorp’s 2022 Substantial Vegetation Management (SVM) audit. Energy Safety finds that PacifiCorp substantially complied with the substantial portion of the vegetation management requirements in its 2022 Wildfire Mitigation Plan Update.

The attached report follows Energy Safety’s publication of its SVM audit on July 17, 2024, and PacifiCorp’s subsequent response on August 6, 2024. Pursuant to statutory requirements, a copy of this report is issued to PacifiCorp, published on Energy Safety’s 2022 SVM Docket¹ and provided to the California Public Utilities Commission.

Sincerely,

A handwritten signature in black ink that reads "Sheryl Bilbrey".

Sheryl Bilbrey
Program Manager, Environmental Science Division
Office of Energy Infrastructure Safety

Cc:

Karen McLaughlin, Energy Safety
Marisa Salazar, Energy Safety
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Amy McCluskey, PacifiCorp
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¹ All documents related to PacifiCorp’s 2022 SVM audit are available on Energy Safety’s e-filing system under the “[2022-SVM](#)” docket number (accessed September 20, 2024).

Tim Clark, PacifiCorp
Jonathan Connelly, PacifiCorp

Attachment: PacifiCorp 2022 SVM Audit Report



OFFICE OF ENERGY INFRASTRUCTURE SAFETY
**2022 SUBSTANTIAL VEGETATION
MANAGEMENT AUDIT REPORT**
PACIFICORP

September 2024

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1. Introduction

Pursuant to Public Utilities Code section 8386.3(c)(5), the Office of Energy Infrastructure Safety (Energy Safety) must audit the vegetation management work performed by, or on behalf of, an electrical corporation. The Audit shall specify any failure of the electrical corporation to fully comply with the vegetation management requirements in its Wildfire Mitigation Plan (WMP).¹ Energy Safety then provides the Audit to the electrical corporation and grants it a reasonable time to correct and eliminate any deficiency therein, documented in a Corrective Action Plan (CAP). Following receipt and review of the electrical corporation's CAP, Energy Safety issues an Audit Report to the electrical corporation identifying whether the electrical corporation substantially complied with the substantial portion of the vegetation management requirements in the applicable year.²

Energy Safety published the 2022 PacifiCorp Substantial Vegetation Management (SVM) Audit on July 17, 2024.³ The Audit concluded that PacifiCorp did not perform all the work specified in two out of the 19 applicable vegetation management initiatives in its 2022 WMP Update as shown in Section 2, Table 1 reproduced from the Audit. In response to the Audit, PacifiCorp submitted its CAP on August 6, 2024.⁴ Energy Safety reviewed PacifiCorp's CAP as part of the analysis presented in Section 3 of this document and determined that PacifiCorp substantially complied with the substantial portion of the vegetation management requirements in its 2022 WMP Update.

¹ Pub. Util. Code, § 8386.3(c)(5)(A).

² [2023 Compliance Guidelines, Section 6.1](#) (September 2023). p. 15.

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55586&shareable=true>, accessed August 8, 2024).

³ [2022 Substantial Vegetation Management Audit PacifiCorp](#).

(<https://efiling.energysafety.ca.gov/Search.aspx?docket=2022SVM>, accessed August 8, 2024).

⁴ [PacifiCorp 2022 SVM Audit Corrective Action Plan](#) (August 2024).

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57187&shareable=true>, accessed August 19, 2024)

2. 2022 SVM Audit Findings

The 2022 SVM Audit found that PacifiCorp performed all required work in 17 of the 19 applicable Initiatives and was deficient in two. Table 1 below is reproduced from Energy Safety's 2022 PacifiCorp SVM Audit.

Number	Initiative	Audit Finding
7.3.5.1	Additional Efforts to Manage Community and Environmental Impacts	Performed Required Work
7.3.5.2	Detailed Inspections and Management Practices or Vegetation Clearances around Distribution Electrical Lines and Equipment	Performed Required Work
7.3.5.3	Detailed Inspections and Management Practices for Vegetation Clearances Around Transmission Electrical Lines and Equipment	Performed Required Work Refer to 7.3.5.2
7.3.5.4	Emergency Response Vegetation Management due to Red Flag Warning or Other Urgent Weather Conditions	Performed Required Work
7.3.5.5	Fuel Management (including all wood management) and Reduction of "slash" from Vegetation Management Activities	Performed Required Work
7.3.5.6	Improvement of Inspections	Performed Required Work
7.3.5.7	Remote Sensing Inspections of Vegetation Around Distribution Electric Lines and Equipment	Performed Required Work
7.3.5.8	Remote Sensing Inspections of Vegetation Around Transmission Electric Lines and Equipment	Performed Required Work Refer to 7.3.5.7
7.3.5.9	Other Discretionary Inspections of Vegetation Around Distribution Electric Lines and Equipment, Beyond Inspections Mandated by Rules and Regulations	Not Applicable Per Approved WMP Update

7.3.5.10	Other Discretionary Inspections of Vegetation Around Transmission Electric Lines and Equipment, Beyond Inspections Mandated by Rules and Regulations	Not Applicable Per Approved WMP Update
7.3.5.11	Patrol Inspections of Vegetation Around Distribution Electric Lines and Equipment	Performed Required Work
7.3.5.12	Patrol Inspections of Vegetation Around Transmission Electric Lines and Equipment	Performed Required Work
7.3.5.13	Quality Assurance / Quality Control of Vegetation Management	Performed Required Work
7.3.5.14	Recruiting and Training of Vegetation Management Personnel	Performed Required Work
7.3.5.15	Identification and Remediation of “At-Risk Species”	Performed Required Work
7.3.5.16	Removal and Remediation of Trees with Strike Potential to Electric Lines and Equipment	Performed Required Work
7.3.5.17	Substation Inspection	Did Not Perform All Required Work
7.3.5.18	Substation Vegetation Management	Performed Required Work
7.3.5.19	Vegetation Management System	Did Not Perform All Required Work
7.3.5.20	Vegetation Management to Achieve Clearances Around Electric Lines and Equipment	Performed Required Work
7.3.5.21	Vegetation Management Activities Post-Fire	Performed Required Work

3. Substantial Vegetation Management Compliance Analysis

Energy Safety is required to assess whether the electrical corporation substantially complied with the substantial portion of the vegetation management requirements in the applicable compliance year.⁵ The determination of substantial compliance is based on an analysis of both the electrical corporation's compliance with each vegetation management initiative as well as the program overall. The initiative level analysis includes:

- 1) **Achievement of Objective-** Determination of whether the electrical corporation's deficiencies, after considering its planned corrective actions, have not detracted from the electrical corporation's ability to achieve the objectives of its vegetation management programs; and
- 2) **Good Faith Effort-** Determination of whether the electrical corporation's effort to fulfill the vegetation management requirement constituted a good faith effort to comply with the vegetation management requirements in the approved WMP.

The final analysis includes a synthesis of initiative level analysis and a programmatic assessment of whether the electrical corporation completed the large majority of the vegetation management requirements in its approved WMP.

Energy Safety's Audit document, dated July 17, 2024, concluded that PacifiCorp did not provide documentation to support that all work was performed for two of the 19 applicable vegetation management initiatives in its 2022 WMP Update (Initiative 7.3.5.17 Substation Inspections and Initiative 7.3.5.19 Vegetation Management Systems). Section 3.1 is the initiative level assessment which includes: 1) a summary of the 2022 SVM audit finding, 2) the CAP submitted by PacifiCorp specific to the audit findings, 3) Energy Safety's initiative level analysis and determination of compliance with the substantial vegetation management portions of the 2022 WMP Update. Section 3.2 is Energy Safety's programmatic assessment of PacifiCorp's completion of the large majority of the vegetation management requirements.

⁵ Pub. Util. Code, § 8386.3(c)(5)(C).

3.1 Initiative Level Assessment

3.1.1 Initiative 7.3.5.17: Substation Inspections

2022 SVM Audit Finding

Energy Safety's 2022 SVM Audit concluded that PacifiCorp failed to provide supporting documentation showing that it completed vegetation management inspections on all its substations as stated in the 2022 WMP Update. PacifiCorp provided documentation for only 55 of its 61 total substations.

PacifiCorp's CAP Response

In its CAP, PacifiCorp stated that it performs vegetation management substation inspections in conjunction with other vegetation management distribution inspections and does not keep separate records documenting completion of the substation inspection activities. As a result, PacifiCorp was unable to provide stand-alone documentation demonstrating completion of all the vegetation management work at its 61 substations. To mitigate this issue, PacifiCorp stated that it would assess the viability of tracking the substation vegetation inspections separately in the future.

Energy Safety's analysis of Substantial Vegetation Management Compliance with the 2022 WMP Update

Criteria 1: Achievement of Objective

While this manner of record keeping prevents Energy Safety from concluding that PacifiCorp did inspect each individual substation, PacifiCorp was able to show that it inspected 90% of its substations. Additionally, with the completion of work in similar initiatives relating to vegetation management inspections, Energy Safety concludes that PacifiCorp achieved the risk reduction objective of this initiative. Furthermore, PacifiCorp has indicated that it will assess potential improvements for record-keeping to track this work into the future, which could demonstrate year-on-year improvement.

Criteria 2: Good Faith Effort

In its CAP, PacifiCorp stated that, upon learning that the substations inspections were not tracked separately from other inspection work, they would "evaluate the feasibility of separately tracking vegetation inspections conducted by the vegetation management

department or their contractors of vegetation along the perimeter of subject substations.”⁶ Considering the planned corrective action for future record keeping improvements and that PacifiCorp completed the vegetation management inspection activities for all other program initiatives, Energy Safety concludes that PacifiCorp made a good faith effort to comply with the requirement.

Initiative Level Determination

If vegetation management inspections were conducted in conjunction with other vegetation management distribution inspections as it states, PacifiCorp achieved the objective of this initiative and demonstrated a good faith effort in its completion. Consequently, PacifiCorp substantially complied with Initiative 7.3.5.17: Substation Inspections. PacifiCorp has acknowledged its record-keeping deficiencies and has indicated that it will assess ways to document these inspections into the future. As PacifiCorp’s vegetation management program matures over time, Energy Safety expects improvements to its record keeping ensuring Energy Safety is able to make an accurate determination of compliance in future years.

3.1.2. Initiative 7.3.5.19: Vegetation Management System

2022 SVM Audit Finding

Energy Safety’s 2022 SVM Audit concluded that while PacifiCorp successfully made changes to various forms to collect additional vegetation management information, it failed to provide adequate documentation to demonstrate that it used its Localized Risk Assessment Model (LRAM) to “assess general vegetation location and volume near assets using publicly available data on tree canopy and more specific information from remote sensing pilot programs”⁷ as required in its 2022 WMP Update. While PacifiCorp did provide a user guide of the LRAM, which stated, “tree canopy coverage was integrated into the fire risk model”, PacifiCorp acknowledged it could not provide additional clarification regarding its statement. Further, the user guide provided instructions for using the model but was not itself evidence that PacifiCorp used the model.

PacifiCorp’s CAP Response

PacifiCorp did not explain a corrective action in its CAP regarding Energy Safety’s finding in 7.3.5.19 Vegetation Management System. Instead, PacifiCorp stated that its vegetation maintenance work management tool, developed in 2020, met the intent of this WMP

⁶ [PacifiCorp 2022 SVM Audit Corrective Action Plan](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57187&shareable=true) (August 12, 2024). pp. 5-6. (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57187&shareable=true, assessed September 19)

⁷ [PacifiCorp’s 2022 WMP Update](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56804&shareable=true), p. 214 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56804&shareable=true, accessed June 6, 2024).

requirement. However, PacifiCorp did not provide documentation demonstrating whether the vegetation maintenance work management tool it described was utilized for the same purpose as the LRAM. After receiving the user guide, Energy Safety requested more specific documentation, such as screenshots, on how the LRAM was utilized. PacifiCorp rejected the request, stating that the information Energy Safety was requesting was not within its possession and that the LRAM was no longer used. PacifiCorp also stated it would be, “unduly burdensome, requiring the creation of a new report or preparation of a study”⁸ to provide such documentation.

In response to Energy Safety’s statement that “PacifiCorp could not provide any documents indicating that it used the model”⁹ in its 2022 SVM Audit, PacifiCorp provided three emails from December 2022 in its CAP. However, this additional documentation provided by PacifiCorp did not address Energy Safety’s original finding, nor did it demonstrate LRAM usage as required by the 2022 WMP Update.

Energy Safety’s analysis of Substantial Vegetation Management Compliance with the 2022 WMP Update

Criteria 1: Achievement of Objective

The information provided by PacifiCorp specific to the LRAM indicates it used the model for other purposes, such as a pilot study for overhanging vegetation, which is outside the scope of this initiative. Despite the insufficient response on the use of the LRAM, PacifiCorp made updates to its detailed records system and forms to record additional vegetation management information, which satisfies the purpose of initiative.

Energy Safety concludes that the missed qualitative target regarding the LRAM does not significantly increase the risk of wildfire ignition because it is secondary to the primary vegetation management requirements.

Criteria 2: Good Faith Effort

PacifiCorp made a good faith effort to meet additional initiative objectives such as updating various forms and its detailed records system for 7.3.5.19 Vegetation Management Systems. However, PacifiCorp did not make a good faith effort to use the LRAM as it committed to in its 2022 WMP Update. PacifiCorp acknowledged that it could not provide the documentation that Energy Safety needed to determine if the work was completed.

⁸ Response to DR-243, question 75.

⁹ [2022 Substantial Vegetation Management Audit PacifiCorp](#), p. A-33

(<https://efiling.energysafety.ca.gov/Search.aspx?docket=2022-SVM>, accessed September 19, 2024).

Initiative Level Determination

While PacifiCorp could not substantiate its statement related to the LRAM usage, it was able to document other work completed for 7.3.5.19 Vegetation Management Systems and thus Energy Safety determines that they have substantially complied with this initiative. While changes to protocols and tools are expected in evolving vegetation management programs, Energy Safety expects to be provided advanced notice of these changes before they are implemented. Should PacifiCorp continue to utilize its vegetation maintenance work management tool in lieu of the LRAM in future years, Energy Safety expects PacifiCorp to provide documentation of the work performed to ensure Energy Safety is able to make an accurate determination of compliance.

3.2 Programmatic Assessment

Energy Safety's Audit document, dated July 17, 2024, found that PacifiCorp completed 17 of the 19 applicable initiatives in its 2022 WMP Update. The two initiatives with deficiencies do not significantly increase wildfire ignition risk, nor do they substantially detract from the work performed. Energy Safety finds that programmatically, PacifiCorp performed the large majority of the work described in its 2022 WMP Update.

4. Conclusion

Based on the analysis discussed above in Section 3.1, Energy Safety concludes that PacifiCorp substantially complied with the substantial portion of the vegetation management requirements in its 2022 WMP Update.

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