

July 11, 2025

VIA OEIS E-FILING

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Docket # 2026-2028-Base-WMPs

RE: PacifiCorp 2026-2028 Base Wildfire Mitigation Plan

Dear Deputy Director Marino:

PacifiCorp d/b/a Pacific Power (PacifiCorp or Company) submits its 2026-2028 Base Wildfire Mitigation Plan (WMP) Update in accordance with the Office of Energy Infrastructure Safety's (Energy Safety) February 21, 2025 Process Guidelines Version 1.0 and February 21, 2025 Final Wildfire Mitigation Plan Guidelines.

The submittal includes the following, which will be filed in Energy Safety Docket #2026-2028-Base-WMPs and posted on the Company's website:¹

- 1) 2026-2028 Base WMP
- 2) 2026-2028 Data Tables
- 3) 2026 Maturity Survey
- 4) Appendix F Attachments
- 5) Appendix G Attachments

Following the direction of Energy Safety's June 20, 2025, Determination Letter regarding PacifiCorp's 2026-2028 Base WMP pre-submission, this filing includes:

- Revisions made per Appendix A of Energy Safety's determination letter, and
- Non-substantive edits identified by PacifiCorp following the pre-submission filing

Section	Page	Type of Change	Change	Reason
Cover	1	Narrative	Changed filing date to July 11, 2025	Identified by PacifiCorp after pre-submittal filing

¹ <https://www.pacifiCorp.com/community/safety/wildfire-mitigation-plans.html>

Section	Page	Type of Change	Change	Reason
Footer	2-538	Narrative	Change footer to "PacifiCorp 2026-2028 Wildfire Mitigation Plan Rev 0 July 11, 2025"	Identified by PacifiCorp after pre-submittal filing
Table of Contents	3-11	Narrative	Updated page numbers	Identified by PacifiCorp after pre-submittal filing
Energy Safety Tables	12-13	Narrative	Updated page numbers	Identified by PacifiCorp after pre-submittal filing
PacifiCorp Tables	13-14	Narrative	Updated page numbers	Identified by PacifiCorp after pre-submittal filing
Energy Safety Figures	14-15	Narrative	Updated page numbers	Identified by PacifiCorp after pre-submittal filing
PacifiCorp Figures	15-17	Narrative	Updated page numbers	Identified by PacifiCorp after pre-submittal filing
2	25-27	Table PAC 2-1	Updated contact information for Josh Hooley	Identified by PacifiCorp after pre-submittal filing
3.3	32-33	Table PAC 3-1	Added Initiative AI-13 to align with new Work Order initiative in Table 8-1 that was added per Energy Safety Direction	Per Energy Safety's determination letter 6/20/25
3.4	34-39	Table 3-1	Based on feedback from Energy Safety, have updated the priority to reflect all the risks in service area and updated the % of ignitions in HFTD and Topographical and Climatological Risk Factors	Identified by PacifiCorp after pre-submittal filing
3.4	33-34	Narrative	Based on feedback from Energy Safety, have provided narrative of how it determined the risk factors in Table 3-1	Per Energy Safety's determination letter 6/20/25
3.4	33-34	Narrative	Based on feedback from Energy Safety, have provided narrative of how it determined the Climatological and Topographical Risk factors in Table 3-1	Per Energy Safety's determination letter 6/20/25
3.6	40	Table 3-3	Change in expenditure due to updated costs for SA-02	Identified by PacifiCorp after pre-submittal filing
3.6	40	Figure 3-1	Change in expenditure due to updated costs for SA-02	Identified by PacifiCorp after pre-submittal filing
3.7	41	Narrative	Updated narrative to reflect that PAC has not performed a climate assessment	Per Energy Safety's determination letter 6/20/25
4.1	43	Table 4-1	Changed "-" to "0"	Per Energy Safety's determination letter 6/20/25
4.2	44	Narrative	Explained "TBD" for Financial Loss column in Table 4-2	Per Energy Safety's determination letter 6/20/25
4.3	45	Narrative	Provided explanation why some Table 4-3 values are "N/A"	Per Energy Safety's determination letter 6/20/25
5	53-102	Narrative	Changed "fuel/terrain" to "Fuel/Terrain"	Identified by PacifiCorp after pre-submittal filing
5.2	53-56	Narrative	Provided a narrative of a high-level overview of risk analysis framework and the factors on the quantification of risk.	Per Energy Safety's determination letter 6/20/25

Section	Page	Type of Change	Change	Reason
5.2	55	Figure PAC 5-2	Added figure as part of discussion of high-level overview of risk analysis framework.	Per Energy Safety's determination letter 6/20/25
5.2	59, 73, 76, 86, 87, 87, 88, 88	Figures PAC 5-3, PAC 5-4, PAC 5-5, PAC 5-6, PAC 5-7, PAC 5-8, PAC 5-9, PAC 5-10	Renumbered	Renumbered due to new figure PAC 5-2 in Section 5.2 that is part of the Section 5.2 update per Energy Safety's determination letter 6/20/25
5.2.1	57	Narrative	Changed "Risk Associated with Ignition Locations (RAIL)" and "Risk Associated with Value Exposure (RAVE)" to "RAIL" and "RAVE" as this is defined previously in Section 5.2	This is now defined in Section 5.2 as part of the Section 5.2 update per Energy Safety's determination letter 6/20/25
5.2.1	58	Narrative	Changes " Wildfire LoRE (likelihood of risk event)" and "CoRE (consequence of risk event)" to "Wildfire LoRE" and "CoRE"	This is now defined in Section 5.2 as part of the Section 5.2 update per Energy Safety's determination letter 6/20/25
5.2.1	67	Narrative	Changed "probability of ignition (POI)" to "POI" as this is now defined previously in Section 5.2	This is now defined in Section 5.2 as part of the Section 5.2 update per Energy Safety's determination letter 6/20/25
5.2.2	73	Figure PAC 5-4	Corrected calculation shown in figure	Identified by PacifiCorp after pre-submittal filing
5.2.2.3	82	Narrative	Provided explanation why some Table Pac 5-2 values are "N/A"	Per Energy Safety's determination letter 6/20/25
5.3	90-91	Narrative	Provided a high-level overview of the scenarios to be used in its risk analysis it provided in Section 5.2.	Per Energy Safety's determination letter 6/20/25
5.3.2	92-93	Narrative	PacifiCorp has provided a narrative on the extreme-event scenarios used in its risk analysis. PacifiCorp must provide a narrative on the extreme-event scenarios used in its risk analysis	Per Energy Safety's determination letter 6/20/25
5.5.2	102	Narrative	Table 5-5 PacifiCorp has provided an explanation for "Overall Utility Program Risk Scores" and "Outage Program Risk Scores" notes as TBD	Per Energy Safety's determination letter 6/20/25
5.5.2	102-103	Table 5-5	Added Column "Circuit, Segment, or Span ID"	Per Energy Safety's determination letter 6/20/25
5.6.2	108-109	Narrative	PacifiCorp has reported on its risk modeling software's model controls, design, and	Per Energy Safety's determination letter 6/20/25

Section	Page	Type of Change	Change	Reason
			review in the areas of modularization, reanalysis and version control.	
6.1.2	121	Narrative	Changed "fuel/terrain" to "Fuel/Terrain"	Identified by PacifiCorp after pre-submittal filing
6.1.2	122	Narrative	Provided explanation why some Table 6-1 values are "TBD"	Per Energy Safety's determination letter 6/20/25
6.1.2	122-123	Table 6-1	Updated "Miles" to "Circuit Miles"	Per Energy Safety's determination letter 6/20/25
6.2.1	139	Narrative	Explained why PacifiCorp is unable to quantify overall risk reduction for Figure 6-1	Per Energy Safety's determination letter 6/20/25
6.2.1	139	Figure 6-1	Updated to show why PacifiCorp is unable to quantify overall risk reduction	Per Energy Safety's determination letter 6/20/25
6.2.1	144-145	Narrative	Provided explanation why some Table 6-3 values are "TBD"	Per Energy Safety's determination letter 6/20/25
6.2.1.3	147	Narrative	Provided explanation why some Table 6-4 values are "TBD"	Per Energy Safety's determination letter 6/20/25
6.2.1.3	152	Narrative	Changed "fuel/terrain" to "Fuel/Terrain"	Identified by PacifiCorp after pre-submittal filing
8.1.2	163	Narrative	Provided explanation why some Table 8-1 values are "N/A" or "TBD"	Per Energy Safety's determination letter 6/20/25
8.1.2	164	Table 8-1	Corrected Page Numbers in "Section; Page Number Column:	Per Energy Safety's determination letter 6/20/25
8.1.2	164	Table 8-1	Clarified units for AI-09, AI-10, GH-01, GH-02, GH-02	Per Energy Safety's determination letter 6/20/25
8.1.2	164	Table 8-1	Changed "-" to "0"	Per Energy Safety's determination letter 6/20/25
8.1.2	164	Table 8-1	Added initiative GH-14: Training for internal and contractor wires personnel on inspection and correction procedures	Per Energy Safety's determination letter 6/20/25
8.1.2	164	Table 8-1	Corrected Column 8 header to "% Risk Reduction for 2026"	Per Energy Safety's determination letter 6/20/25
8.2.1	168	Narrative	Clarified that miles for GH-01 are circuit miles	Per Energy Safety's determination letter 6/20/25
8.1.2	164	Table 8-1	Corrected Section number for GH-02 and GH-01 ESS Circuit Hardening	Per Energy Safety's determination letter 6/20/25
8.1.2	164	Table 8-1	Added initiative AI-13: Quarterly Review of Past Due Level 1 and 2 Fire Threat Condition Related Work Orders and Plan for Remediation	Per Energy Safety's determination letter 6/20/25
8.1.2	164	Table 8-1	Added GH-15 to table	Identified by PacifiCorp after pre-submittal filing
8.3	187	Narrative	Provided explanation why some Table 8-2 values are "N/A" or "TBD"	Per Energy Safety's determination letter 6/20/25
8.3	188	Table 8-2	Corrected 2027-2028 population and sample size	Identified by PacifiCorp after pre-submittal filing

Section	Page	Type of Change	Change	Reason
8.3	188	Table 8-2	Corrected column 3 from "Frequency or Trigger" to "Method of inspection"	Identified by PacifiCorp after pre-submittal filing
8.3	188	Table 8-2	Updated "Method of Inspection Column with method of inspections"	Identified by PacifiCorp after pre-submittal filing
8.3	188	Table 8-2	Corrected Transmission Infrared Counts	Identified by PacifiCorp after pre-submittal filing
8.3	188	Table 8-2	Updated condition finding rates for Distribution and Substation	Identified by PacifiCorp after pre-submittal filing
8.3	188	Table 8-2	Changed the "-" to 0	Per Energy Safety's determination letter 6/20/25
8.3.1	190	Figure 8-1	Added Figure 8-1	Per Energy Safety's determination letter 6/20/25
8.3.2	193	Figure 8-2	Added Figure 8-2	Per Energy Safety's determination letter 6/20/25
8.3.3	196	Figure 8-3	Added Figure 8-3	Per Energy Safety's determination letter 6/20/25
8.3.7	206	Narrative	Added narrative referencing Figure 8-7	Per Energy Safety's determination letter 6/20/25
8.3.7	206-207	Figure 8-7	Added Figure 8-7	Per Energy Safety's determination letter 6/20/25
8.3.8	208	Narrative	Added narrative referencing Figure 8-8	Per Energy Safety's determination letter 6/20/25
8.3.8	209	Figure 8-8	Added Figure 8-8	Per Energy Safety's determination letter 6/20/25
8.3	218	Table 8-3	Clarified objectives for inspection programs	Per Energy Safety's determination letter 6/20/25
8.5.1	219	Narrative	Provided explanation why some Table 8-4 values are "TBD"	Per Energy Safety's determination letter 6/20/25
8.5.1	220	Table 8-4	Clarified Population/Sample units	Per Energy Safety's determination letter 6/20/25
8.5.1	220	Table 8-4	Corrected 2027-2028 population size and sample size for GH-01 from TBD to 3	Identified by PacifiCorp after pre-submittal filing
8.6	240	Narrative	Added narrative to describe work order initiative AI-13 added to Table 8-1	Per Energy Safety's determination letter 6/20/25
8.7.3	257	Narrative	Removed duplicate narrative	Identified by PacifiCorp after pre-submittal filing
9.1.1	263	Narrative	Provided explanation why some Table 9-1 values are "N/A" or "TBD"	Per Energy Safety's determination letter 6/20/25
9.1.1	264	Table 9-1	Corrected Page Numbers in "Section; Page Number Column:	Per Energy Safety's determination letter 6/20/25
9.1.1	264	Table 9-1	Corrected Activity (Tracking ID) for Defensible Space: Develop hazard tree process for trees outside of Substation property.	Identified by PacifiCorp after pre-submittal filing
9.1.2	265	Narrative	Provided explanation why some Table 9-2 values are "N/A" or "TBD"	Identified by PacifiCorp after pre-submittal filing
9.1.2	266-267	Table 9-2	Corrected Page Numbers in "Section; Page Number Column:	Per Energy Safety's determination letter 6/20/25

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Section	Page	Type of Change	Change	Reason
9.1.2	266-267	Table 9-2	Updated units in "Target Unit" column	Per Energy Safety's determination letter 6/20/25
9.1.2	266-267	Table 9-2	Added Activity timeline Target Information	Per Energy Safety's determination letter 6/20/25
9.1.2	266-267	Table 9-2	Corrected header " % HFTD/FHCA Covered in 2026" to "% HFTD Covered in 2026"	Identified by PacifiCorp after pre-submittal filing
9.1.2	266-267	Table 9-2	Updated % HFTD Covered in 2026 for VM-13	Identified by PacifiCorp after pre-submittal filing
9.1.2	266-267	Table 9-2	Added "Three-Year Total" column and totals	Per Energy Safety's determination letter 6/20/25
9.2	264	Table 9-3	Removed substation activity from table	Per Energy Safety's determination letter 6/20/25
9.2.1	268	Narrative	Corrected section name to align with the inspection Activity (Program) name in Table 9-3	Per Energy Safety's determination letter 6/20/25
9.2.2	273	Narrative	Corrected section name to align with the inspection Activity (Program) name in Table 9-3	Per Energy Safety's determination letter 6/20/25
9.2.3	277	Narrative	Corrected section name to align with the inspection Activity (Program) name in Table 9-3	Per Energy Safety's determination letter 6/20/25
9.2.4	281	Narrative	Corrected section name to align with the inspection Activity (Program) name in Table 9-3	Per Energy Safety's determination letter 6/20/25
9.2.5	284	Narrative	Corrected section name to align with the inspection Activity (Program) name in Table 9-3	Per Energy Safety's determination letter 6/20/25
9.6.1	295	Narrative	Updated PRC 429 to 4291	Per Energy Safety's determination letter 6/20/25
9.7.3	297	Narrative	Provided clarification of priority of work in HFTD and HFRA	Per Energy Safety's determination letter 6/20/25
9.8.1	298	Narrative	Provided explanation for why some Table 9-4 values are "N/A"	Per Energy Safety's determination letter 6/20/25
9.11.1	307	Table 9-5	Corrected Defensible Space initiative from VM-11 to VM-13	Per Energy Safety's determination letter 6/20/25
9.11.1	307	Narrative	Provided explanation for why some Table 9-6 values are "N/A"	Per Energy Safety's determination letter 6/20/25
9.11.1	309-310	Table 9-6	Updated column 13 and 14 headings	Per Energy Safety's determination letter 6/20/25
9.11.1	309-310	Table 9-6	Corrected Population/Sample Unit to align with Table 9-2	Per Energy Safety's determination letter 6/20/25
9.11.1	309-310	Table 9-6	Updated 2026-2028 Percent of Sample in HFTD for Pole Clearing (DPL and LRA)	Identified by PacifiCorp after pre-submittal filing
9.12.3	316	Narrative	Provided explanation for why some Table 9-7 and 9-8 values are "TBD"	Per Energy Safety's determination letter 6/20/25
9.13.1	317	Narrative	Provided explanation for why some Table 9-9 values are "TBD" or "N/A"	Per Energy Safety's determination letter 6/20/25

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10.1.2	324	Narrative	Provided explanation for why some Table 10-1 values are "TBD" or "N/A"	Per Energy Safety's determination letter 6/20/25
10.1.2	325	Table 10-1	Corrected Page Numbers in "Section; Page Number" Column	Per Energy Safety's determination letter 6/20/25
10.1.1	325	Table 10-1	Corrected Sections for Situational Awareness and Tools, Implement WRF Ensemble Forecasting, Climate Vulnerability Assessment, Machine Learning techniques of Normalized Differential Vegetation Index (NDVI) and Self Organizing Maps (SOMs), Fire Potential Index (FPI) Improvements, Expansion of Weather Station Network, Install Wildfire Detection Cameras, Installation of cFCI, Installation of SCAN, Distribution Protective Settings Review, Installation of Advanced AMI Meters	Per Energy Safety's determination letter 6/20/25
10.1.2	325	Table 10-1	Changed Intallation cFCI to Installation of cFCI	Identified by PacifiCorp after pre-submittal filing
10.1.2	325	Table 10-1	Corrected GH initiatives to SA-02 initiatives	Per Energy Safety's determination letter 6/20/25
10.1.2	325	Table 10-1	Moved initiative RA-04: Data Integration Foundry to Table 12-1	Per Energy Safety's determination letter 6/20/25
10.1.2	325	Table 10-1	Added initiative MA-01: Weather Station Maintenance and Calibration	Per Energy Safety's determination letter 6/20/25
	325	Table 10-1	Removed initiative SA-04: Install Wildfire Detection Cameras	Identified by PacifiCorp after pre-submittal filing that there are no plans to install cameras in 2026-2028
10.2.1	328	Figure PAC 10-2	Updated map of fixed weather station locations	Identified by PacifiCorp after pre-submittal filing
10.2.4	331-333	Narrative	Provided narrative	Per Energy Safety's determination letter 6/20/25
10.2.4	333	Figure PAC 10-5	Added figure to support narrative	Per Energy Safety's determination letter 6/20/25
10.3.1	336, 337, 338, 339	Figures PAC 10-6, PAC 10-7, PAC 10-8, PAC 10-9	Renumbered	Renumbered due to new PAC 10-5 Figure
10.3.1	337	Narrative	SA-02 Line Sensor: Early Fault Detection (EFD): updated line miles to circuit miles	Per Energy Safety's determination letter 6/20/25
10.3.3	341	Narrative	Provided explanation for why some Table PAC 10-1 values are "TBD"	Per Energy Safety's determination letter 6/20/25
10.3.3	342-343	Table PAC 10-1	Added new initiative Distribution Sensor Operation Insights and Analytics to address requirement to have an Enterprise System target for Grid Monitoring	Per Energy Safety's determination letter 6/20/25

Section	Page	Type of Change	Change	Reason
10.4.1	346, 347, 349, 350, 351, 353	Figures PAC 10-10, PAC 10-11, PAC 10-12, PAC 10-13, PAC 10-14, PAC 10-15	Renumbered	Renumbered due to new Figure PAC 10-5 in Section 10.2.4 that is part of the Section 10.2.4 update per Energy Safety's determination letter 6/20/25
10.5	356, 359, 359, 361	Figure PAC 10-16, PAC 10-17, PAC 10-18, PAC 10-19	Renumbered	Renumbered due to new Figure PAC 10-5 in Section 10.2.4 that is part of the Section 10.2.4 update per Energy Safety's determination letter 6/20/25
10.5.3	368	Narrative	Changed Activity Tracking ID for Data integration (Foundry) to ES-01	Identified by PacifiCorp after pre-submittal filing
10.5.3	368	Narrative	Clarified that Data Integration (Foundry) Initiative also supports PSPS.	Identified by PacifiCorp after pre-submittal filing
10.5.5	370	Narrative	Provided explanation for acceptable percentage of weather station outages, impacts to PSPS and acceptable levels of coverage	Per Energy Safety's determination letter 6/20/25
10.6	372, 373 376	Figures PAC 10-20, PAC 10-21, PAC 10-22	Renumbered	Renumbered due to new Figure PAC 10-5 in Section 10.2.4 that is part of the Section 10.2.4 update per Energy Safety's determination letter 6/20/25
10.6.1	373	Narrative	Provided explanation why some Table 10-5 values are "N/A"	Per Energy Safety's determination letter 6/20/25
11	378	Narrative	Corrected Section 11 Header	Per Energy Safety's determination letter 6/20/25
11.1.1	378	Narrative	Provided explanation for why some Table 11-1 values are "N/A"	Per Energy Safety's determination letter 6/20/25
11.1.1	379-380	Table 11-1	Corrected Page Numbers in "Section; Page Number" Column	Per Energy Safety's determination letter 6/20/25
11.1.1	379-380	Table 11-1	Corrected Activity Tracking ID for Western Wildfire Communications workshop to CO-04 and Previous tracking ID to "N/A"	Identified by PacifiCorp after pre-submittal filing

Section	Page	Type of Change	Change	Reason
11.1.1	379-380	Table 11-1	Corrected sections for initiatives: Create a way for non-account holders to register for outage/emergency alerts, Conduct pre-season and post-season customer surveys to assess understanding of messaging and information shared by PacifiCorp and inform adjustments in messaging, Increase awareness of PacifiCorp's programs and services available for AFN customers before, during and after a PSPS, Continue to identify customers who are Electricity Dependent, Identify enhancements to programs and resources needed to mitigate the impacts of PSPS on AFN customers, Coordinate and integrate resources with state, community and utility to minimize duplication of AFN programs, Develop and update wildfire de-energization materials for customers to communicate PacifiCorp Emergency De-Energization for Wildfire, Continue the use of tabletop exercises to prepare for emergencies and PSPS events, Implement improvement to Public Safety Partner Portal (PSP Portal)	Per Energy Safety's determination letter 6/20/25
11.2.1	384	Table 11-2	Updated with target timeline	Per Energy Safety's determination letter 6/20/25
11.3.1	402-404	Table 11-3	Updated with reference to Emergency Response plan	Per Energy Safety's determination letter 6/20/25
11.3.1	405	Table 11-4	Updated with target timeline	Per Energy Safety's determination letter 6/20/25
11.4.1	412-415	Table 11-9	Updated N/A to reflect the work being done. Misunderstood what the requirement was for information in this column.	Per Energy Safety's determination letter 6/20/25
12.1	435	Narrative	Provided explanation for why some Table 12-1 values are "N/A"	Per Energy Safety's determination letter 6/20/25
12.1	436	Table 12-1	Added Grid Monitoring, Situational Awareness and Risk Assessment Qualitative Targets	Per Energy Safety's determination letter 6/20/25
12.1	436	Table 12-1	Corrected Page Numbers in "Section; Page Number" Column	Per Energy Safety's determination letter 6/20/25
12.1	436	Table 12-1	Correction to section for initiatives Implement new vegetation management work management software and Quality Assurance/Quality Control: Create QA/QC process and procedure for reviewing data in the Vegetation Management database (Quality Reviews)	Per Energy Safety's determination letter 6/20/25

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Section	Page	Type of Change	Change	Reason
Appendix A	452	Narrative	Renamed to include Appendix in section name	Identified by PacifiCorp after pre-submittal filing
Appendix B	468	Narrative	Renamed to include Appendix in section name	Identified by PacifiCorp after pre-submittal filing
Appendix B	468	Narrative	Corrected reference from Table PAC B-2 to Table PAC B-1	Identified by PacifiCorp after pre-submittal filing
Appendix B	471	Narrative	Provided explanation why some Table PAC B-2 values are "N/A"	Per Energy Safety's determination letter 6/20/25
Appendix B	473	Narrative	Provided explanation why some Table PAC B-3 values are "N/A"	Per Energy Safety's determination letter 6/20/25
Appendix C	503		Renamed to include Appendix in section name	Identified by PacifiCorp after pre-submittal filing
Appendix D	504	Narrative	Renamed to include Appendix in section name	Identified by PacifiCorp after pre-submittal filing
Appendix D	504-524	Narrative	Updated page numbers where information on the ACIs can be found within the WMP	Per Energy Safety's determination letter 6/20/25
Appendix D	506	Narrative	Added section and page number for PC-23B-02	Identified by PacifiCorp after pre-submittal filing
Appendix D	519	Narrative	Updated section for PC-23B-16 Vegetation Management Priority Tagging from 12.1 to 12.2	Identified by PacifiCorp after pre-submittal filing
Appendix E	530	Narrative	Renamed to include Appendix in section name	Identified by PacifiCorp after pre-submittal filing
Appendix F	535	Narrative	Renamed to include Appendix in section name	Identified by PacifiCorp after pre-submittal filing
Appendix G	537	Narrative	Renamed to include Appendix in section name	Identified by PacifiCorp after pre-submittal filing

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

Sincerely,



Robert Meredith
Director, Regulation