

July 29, 2025

VIA OEIS E-FILING

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Docket # 2026-2028-Base-WMPs

RE: PacifiCorp 2026-2028 Base Wildfire Mitigation Plan – Substantive Errata Resubmission

Dear Deputy Director Marino:

PacifiCorp d/b/a Pacific Power (PacifiCorp or Company) submitted its 2026-2028 Base Wildfire Mitigation Plan (WMP) on July 11, 2025. The Company has since identified the need for substantive changes to the filing and submitted an errata in accordance with the Office of Energy Infrastructure Safety's (Energy Safety) February 21, 2025 Process Guidelines Version 1.0, Section 7 on July 25, 2025.

The Company resubmits this substantive errata (redlines only) as requested by Energy Safety on July 28, 2025.

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_Substantive Errata_R0 – Redline
- 2) 2026-2028 Data Tables_Substantive Errata_R0 – Redline

Revisions in PacifiCorp's 2026-2028 Base WMP filing are identified in the table below:

Section	Page	Edit	Reason	Substantive
5.2.2	74-75	Figure 5-2 Updated figure with lines from Rate of Spread, Population Impacted, Buildings Destroyed, Terrain Difficulty Index, Disabled Population, Poverty Population, Fire Behavior Index, Fire Size Potential, Flame Length, Fire Station Density, Fuel Model Majority	Correction to figure for clarity	No

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

Section	Page	Edit	Reason	Substantive
5.2.2.1	76	Removed "Expected Risk" from "Wildfire Likelihood (Expected Risk)"	Correction: The wildfire likelihood calculation is in the substantive errata how PacifiCorp calculates the Fuel/Terrain and Wind scores and is not the expected risk calculation as shown in the substantive errata filing.	Yes
5.2.2.1	77	Updated Wildfire Likelihood Calculation to $WL=POF*POI$	Clarification of calculation	Yes
5.2.2.1	77-78	Added: POF=Probability of Fault POI=Given the fault, what is the probability of an ignition from that fault Removed: IL=Ignition Likelihood. This is the expected risk and utilizes POF and POI. Att=Selected attribute. The attributes could include Fire Spread, Fire Behavior, and Fire Size Potential. One attribute or multiple attributes may be selected for the calculation. Percentile. The percentile is based on expected weather conditions at each percentile with better weather days (low wind, wet) at lower percentiles and fire weather days (hot, dry, and windy) at higher percentiles. Weighting: This is the weighting assigned to a specific attribute	Clarification of calculation	Yes
9.2.1.1	269	Changed "Overhead" to "Overview"	Corrected to align with Technical Guidelines	No
9.2.1.1	270	Corrected "PacifiCorp conducts routine inspections or detailed inspections..." to "PacifiCorp conducts routine inspections also known as detailed inspections..."	Corrected for clarity	No
9.2.2.1	275	Changed "Overhead" to "Overview"	Corrected to align with Technical Guidelines	No
9.2.3.1	278	Changed "Overhead" to "Overview"	Corrected to align with Technical Guidelines	No

Section	Page	Edit	Reason	Substantive
9.2.3.1	278	Corrected "PacifiCorp conducts routine inspections or detailed inspections..." to "PacifiCorp conducts routine inspections also known as detailed inspections..."	Corrected for clarity	No
9.2.4.1	282	Changed "Overhead" to "Overview"	Corrected to align with Technical Guidelines	No
9.2.5.1	285	Changed "Overhead" to "Overview"	Corrected to align with Technical Guidelines	No
9.2.5.1	285	Corrected "PacifiCorp conducts non-routine inspections or patrol inspections..." to "PacifiCorp conducts non-routine inspections also known as patrol inspections..."	Corrected for clarity	No
10.3.1	337	Changed tracking ID from GO-01 to SA-02	Correction to align with initiative tracking ID in Table 10-1	No
11.1.1	381-382	Table 11-1 Updated page numbers in column "Section; Page number"	Corrected and updated	No
11.2.1	389	Removed "the" from sentence "The PSPS Playbook is a standalone document and not part of the PacifiCorp's all hazards ERP."	Grammar	No
11.2.1	400	Figure PAC 11-2: Replaced "Seminar" with "Workshop"	Updated to align with discussion of "workshops below figure"	No
11.2.1	401-402	Removed "Seminars" section from narrative.	Clarity	No
11.2.1	394	Changed "service" to "serve" in sentence "The Wildfire and Emergency Response Team is staffed by fire emergency response managers who will provide resource support during wildland fires and other events; the response managers fulfill the role of agency representative and will serve as the primary point of contact with incident management."	Grammar	No
11.2.1	395-396	Added "Management" to title "Emergency Management Duty Officer"	Updated to include full name of role	No
11.2.1	395	Added "Serves as primary liaison between internal and external partners. Available 24x7." to responsibilities of Emergency Management Duty Officer	Updated to include additional responsibilities	No

Section	Page	Edit	Reason	Substantive
11.2.1	395	Added "Specialist" to "Wildfire Intelligence Center Specialists"	Clarity, the Wildfire Intelligence Center is a department, the Wildfire intelligence Center Specialist is a role in the department"	No
11.2.1	395	Added "PSPS" to the incident types Wildfire intelligence Center Specialists respond to	Updated based on learnings from 2025 PSPS event in Utah	No
11.2.1	396	Changed "Wildfire and Emergency Response Team" to "Fire and Emergency Response Managers"	Clarity, the Wildfire and Emergency Response Team" is a department, the Fire and Emergency Response Managers is a role in the department"	No
11.2.1	396	Removed "with local" from "Serve as liaison for with local fire agencies at the field response level"	Clarity. The FERM is liaison Ing with fire agencies managing the incident from state CIMT to local agencies.	No
11.3.1	406-407	Table 11-3: Added Quartz Valley Indian Reservation	Table updated to reflect recent PacifiCorp engagement with Quartz Valley Indian Reservation	No
11.2.1	396	Capitalized "Incident" in "Experience in Complex incident Management Teams (CIMT) or Fire Chief, experience in service area."	Grammar	No
11.2.1	396	Changed "Participated in ECC coordination meetings" to "Lead ECC activities"	Clarified ECC Executive's role	No
11.2.1	398	Removed "Work with various teams to organize and host public events and promotions" from role of Public information officer.	Clarity, public events and promotions are typically not held as a response to Wildfire or PSPS Emergency	No
11.3.1	409	Table 11-5: Added Quartz Valley Indian Reservation	Table updated to reflect recent PacifiCorp engagement with Quartz Valley Indian Reservation	No
11.3.1	409	Table 11-5: Added "Wildfire" to row for Tolowa Dee-in' Tribe	Grammar	No

Section	Page	Edit	Reason	Substantive
11.3.3	411	Table 11-7: Added Quartz Valley Indian Reservation	Table updated to reflect recent PacifiCorp engagement with Quartz Valley Indian reservation	No
Appendix B	485	Figure B-6: Updated figure with lines from Rate of Spread, Population Impacted, Buildings Destroyed, Terrain Difficulty Index, Disabled Population, Poverty Population, Fire Behavior Index, Fire Size Potential, Flame Length, Fire Station Density, Fuel Model Majority	Correction to figure for clarity	No

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

Sincerely,



Robert Meredith
Director, Regulation