State of California – A Natural Resources Agency
Gavin Newsom, Governor

OFFICE OF ENERGY INFRASTRUCTURE SAFETY
715 P Street, 15th Floor | Sacramento, CA 95814
916.902.6000 | *www.energysafety.ca.gov*
Caroline Thomas Jacobs, Director

October 13, 2025

Curt Mansfield
Senior Vice President, Power Delivery
PacifiCorp *dba* Pacific Power
825 NE Multnomah St, Ste 2000
Portland, Oregon 97232

Subject: The Office of Energy Infrastructure Safety Issuance of Revision Notice for the PacifiCorp *dba* Pacific Power 2026-2028 Base Wildfire Mitigation Plan

Mr. Mansfield:

Enclosed is the Office of Energy Infrastructure Safety's Revision Notice for PacifiCorp *dba* Pacific Power's (PacifiCorp) 2026-2028 Base Wildfire Mitigation Plan (2026-2028 Base WMP). No later than November 27, 2025, PacifiCorp must provide:

- A Revision Notice Response, which includes its response to each critical issue.
- A redlined revised version of its 2026-2028 Base WMP that includes any changes resulting from its Revision Notice Response as well as corrections to non-substantive errors identified in Section 4 of the Revision Notice.

Section 5 of the Revision Notice provides submission instructions. The schedule for PacifiCorp's Revision Notice and Draft Decision is as follows:

PacifiCorp Revision Notice Response Due	November 26, 2025
Opening Comments Due	December 11, 2025
Reply Comments Due	December 22, 2025
Energy Safety Draft Decision Issued No Later Than	February 28, 2026

Sincerely,

/s/ Tony Marino

Tony Marino
Deputy Director | Electrical Safety Policy Division
Office of Energy Infrastructure Safety

OFFICE OF ENERGY INFRASTRUCTURE SAFETY

REVISION NOTICE

PACIFICORP DBA PACIFIC POWER

2026-2028 BASE WILDFIRE MITIGATION PLAN

October 13, 2025

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1. Introduction

The Office of Energy Infrastructure Safety (Energy Safety) may direct an electrical corporation to modify its Wildfire Mitigation Plan (WMP) by issuing a Revision Notice.[1]

This Revision Notice identifies critical issues in PacifiCorp *dba* Pacific Power's (PacifiCorp)'s 2026-2028 Base WMP (2026-2028 Base WMP). Critical issues are areas of significant concern that an electrical corporation must address prior to the completion of Energy Safety's evaluation. PacifiCorp must address the critical issues set forth in this Revision Notice according to the parameters provided herein.

This Revision Notice also includes non-substantive errors PacifiCorp must correct in its resubmitted WMP (Section 4).

Section 5 provides submission instructions and deadlines for PacifiCorp's Revision Notice Response.

[1] Pub. Util. Code § 8386.3(a).

2. Summary of Critical Issues

This section outlines issues associated with PacifiCorp's 2026-2028 Base WMP that either by itself or in conjunction with other issues listed amount to critical issues. Energy Safety identified nine such issues, listed below by mitigation category.

Section 3 provides a more detailed explanation of each concern and provides the required remedies. For the purposes of PacifiCorp's Revision Notice Response and Energy Safety's continued evaluation, each issue is assigned a tracking code.

General

- **RN-PC-26-01:** PacifiCorp used the same tracking ID for multiple mitigation activities.
- **RN-PC-26-02:** Numerous PacifiCorp qualitative targets lack specificity and are not measurable.

Risk Methodology and Assessment

- **RN-PC-26-03:** PacifiCorp must provide greater consistency in explaining components of its risk model and provide transparency into the relationship between each component.

Grid Design, Operations, and Maintenance

- **RN-PC-26-04:** PacifiCorp's combined targets for covered conductor and undergrounding do not allow for distinct, trackable targets.
- **RN-PC-26-05:** PacifiCorp did not discuss its equipment maintenance in the WMP narrative.
- **RN-PC-26-06:** PacifiCorp's asset inspection quality assurance program does not provide targets for each of its six disparate asset inspection programs.
- **RN-PC-26-07:** Numerous PacifiCorp Grid Design, Operation, and Maintenance quantitative targets are not measurable.

Vegetation Management

- **RN-PC-26-08:** PacifiCorp does not prioritize vegetative work or track remediations, leaving vegetation close to energized infrastructure unremediated because of open work orders.

Enterprise Systems

- **RN-PC-26-09:** PacifiCorp did not provide sufficient narrative for the enterprise system requirement to discuss its asset identification process and its process for integrating 100 percent asset identification or a justification for not having this process in place.

3. Critical Issues and Required Remedies

3.1 General

3.1.1 RN-PC-26-01: PacifiCorp used the same tracking ID for multiple mitigation activities.

The WMP Guidelines require that, "Each electrical corporation must implement a tracking system using tracking IDs, as specified in the applicable Energy Safety Data Guidelines."[2] The Energy Safety Data Guidelines define a tracking ID as, "The unique tracking ID for **a** given WMP mitigation activity."[3] A "mitigation activity" is "[**a**] measure that contributes to or accomplishes a mitigation initiative designed to reduce the consequences and/or probability of wildfire or outage event."[4]

In ten instances its 2026-2028 Base WMP, PacifiCorp used one tracking ID for multiple mitigation activities.

The following list identifies tracking IDs that PacifiCorp used for multiple mitigation activities. Each sub-bullet is a separate mitigation activity being tracked under the same ID.

- (AI-12) Quality Assurance / Quality Control (QA/QC) (Asset Inspections)
    - Transmission Patrol Inspections.
    - Distribution Patrol Inspections.
    - Transmission Detailed Inspections.
    - Distribution Detailed Inspections.
    - Transmission Intrusive Inspections.
    - Distribution Intrusive Inspections.
- (SA-02) Grid Monitoring Systems.
    - Installation of cFCI.
    - Installation of SCAN.
    - Distribution Protective Settings Review.

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[2] WMP Guidelines, page 16.

[3] Data Guidelines page 150, emphasis added.

[4] WMP Guidelines, page A-11, emphasis added.

  - Installation of Advanced AMI Meters.
- (SA-05) Weather Forecasting
  - Situational Awareness Tools and Models.
  - Implement WRF Ensemble Forecasting.
  - Climate Vulnerability Assessment.
  - Machine Learning techniques of Normalized Differential Vegetation Index (NDVI) and Self Organizing Maps (SOMs).
- (VM-02) Vegetation Inspections: Detailed Inspection – Transmission
  - Routine (Detailed) Inspection – Local Transmission (TNT).
  - Routine (Detailed) Inspection – Main Grid (MGI).
  - Pole Clearing (VM-05).
  - Pole Clearing PRC 4292 (DPL).
  - Pole Clearing (LRA).
- (VM-11) Quality Assurance / Quality Control (Vegetation)
  - Routine Distribution (Detailed).
  - Off-cycle Distribution (Patrol).
  - Non-Routine Transmission (Patrol).
  - Pole Clearing.
- (VM-13) Substation Defensible Space
  - Substation Defensible Space (with quantitative targets).
  - Develop hazard tree process for trees outside of Substation property (with qualitative targets).
- (VM-14) Integrated Vegetation Management
  - Integrated Vegetation Management: develop a process for conducting outreach to known nurseries participating in the tree replacement program.
  - Integrated Vegetation Management: Review and identify opportunities to expand use of tree growth regulator.
- (CO-01) Public Outreach and Education Awareness Program
  - Conduct pre-season and post-season customer surveys to assess understanding of messaging and information shared by PacifiCorp and inform adjustments in messaging.
  - Create a way for non-account holders to register for outage/emergency alerts.
- (CO-02) Engagement with Access and Functional Needs Populations
  - Continue to identify customers who are Electricity Dependent.

  - Coordinate and integrate resources with state, community and utility to minimize duplication of AFN programs.
  - Identify enhancements to programs and resources needed to mitigate the impacts of PSPS on AFN customers.
- (ES-01) Enterprise Systems Development
  - Business Transformation Wave 4: Maximo.
  - Data Integration (Foundry).
  - Distributed Sensor Operation Insights and Analytics.
  - Implement new vegetation management work management software
  - Quality Assurance/Quality Control: Create QA/QC process and procedure for reviewing data in the Vegetation Management database (Quality Reviews).
  - Vegetation Management and Inspections: Develop work prioritization to incorporate within [Mobile Data Management System (MDMS)].

For the ten tracking IDs above, PacifiCorp did not provide a unique tracking ID for each mitigation activity. Instead, each tracking ID addresses multiple mitigation activities, each designed to reduce the consequences and/or probability of a wildfire or outage event.

Without a clearly delineated tracking ID for each specific mitigation activity, Energy Safety cannot clearly track PacifiCorp's progress for each mitigation activity.

3.1.1.1 Required Remedy

PacifiCorp must revise its 2026-2028 Base WMP to provide a unique tracking ID for each mitigation activity within the tracking IDs listed below. PacifiCorp must also update each relevant table and the accompanying narratives for each of the mitigation activities:

- AI-12; Table 8-3,
- VM-02; Table 9-2,
- VM-05; Table 9-2,
- VM-11; Table 9-5,
- VM-13; Tables 9-1 and 9-2,
- VM-14; Table 9-1,
- SA-02; Table 10-1,
- SA-05; Table 10-1,
- CO-01; Table 11-1,
- CO-02; Table 11-1, and
- ES-01; Table 12-1.

3.1.2 RN-PC-26-02: Numerous PacifiCorp qualitative targets lack specificity and are not measurable.

The WMP Guidelines state that targets are used to "track the electrical corporation's completion of the activities in its approved WMP."[5] Additionally, the WMP Guidelines define the required qualitative targets as "[s]pecific, measurable, achievable, realistic, and timely outcomes for the overall WMP strategy, or mitigation initiatives and activities that a utility can implement to satisfy the primary goals and subgoals of the WMP program."[6]

PacifiCorp's qualitative targets discussed below are vague and do not demonstrate an overall strategy that will occur during each year of the WMP cycle; and therefore, do not meet the WMP Guidelines requirements for qualitative targets.

For PacifiCorp's Vegetation Management mitigation activity Workforce Planning (Vegetation Management) (VM-15), PacifiCorp seeks to "drive consistency among inspection contractors" and provides the qualitative targets of "Start" (for 2026), "Implement" (for 2027), and "Ongoing implementation" (for 2028).[7, 8] "Start," "Implement," and "Ongoing Implementation" do not provide clear milestones that guide PacifiCorp towards improving consistency between inspection contractors. They are also not targets against which PacifiCorp can measure its progress, and by which Energy Safety can later determine whether PacifiCorp provided a timely outcome for this activity.

Similarly, PacifiCorp's qualitative targets for its Wood and Slash Management/Debris Disposal (VM-12) mitigation activity to benchmark debris management data collection with other California utilities are "Start" (for 2026), "Continue benchmarking" (for 2027), and "Complete Benchmarking" (for 2028).[9] None of these targets are specific or measurable. For example, PacifiCorp did not specify individual benchmarking activities it is starting or continuing; what milestones through benchmarking it is trying to achieve; or what measurements indicate how benchmarking is progressing towards completion.

For PacifiCorp's Wood and Slash Management/Debris Disposal (VM-12) qualitative target, Energy Safety asked PacifiCorp in a data request to provide the annual number of benchmarking activities that it will perform; describe the benchmarking activities including methods and topics; list the California utilities PacifiCorp plans to benchmark with; and describe anticipated outcomes for each year of the 2026-2028 WMP cycle. In its response,

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[5] WMP Guidelines, page 12.

[6] WMP Guidelines, page A-15.

[7] PacifiCorp 2026-2028 Base WMP, page 321.

[8] PacifiCorp 2026-2028 Base WMP, page 264.

[9] PacifiCorp 2026-2028 Base WMP, page 264.

PacifiCorp only stated that it expects to start benchmarking in 2026 by hosting a single event; explained it will use "recurring virtual sessions to benchmark"; provided three example benchmarking topics; and broadly described anticipated outcomes. PacifiCorp did not further explain or add to its 2027 or 2028 targets to make them specific or measurable.[10]

Because "[t]he electrical corporation uses targets to set commitments for specific activities in its WMP,"[11] measurable targets are a critical aspect of wildfire mitigation work. However, most of PacifiCorp's qualitative targets are similar to the examples above. Each vaguely discussed the action PacifiCorp will take each year instead of providing a measurable objective it intends to meet.

The following list contains mitigation activities and targets, including the ones referenced above, that lack specificity and are not measurable:

- VM-12 Wood and Slash Management
    - Targets of "Start," "Continue benchmarking," and "Complete Benchmarking."
- VM-13 Substation Defensible Space
    - Targets of "Process Development," and "Implement."
- VM-14 Integrated Vegetation Management: develop a process for conducting outreach to known nurseries participating in the tree replacement program
    - Targets of "Start," "Implement," and "Ongoing Implementation."
- VM-14 Integrated Vegetation Management: Review and Identify opportunities to expand use of tree growth regulator
    - Targets of "Start," "In progress," and "Complete."
- VM-15 Workforce Planning (Vegetation Management)
    - Targets of "Start," "Implement," and "Ongoing Implementation."
- SA-05 Implement WRF Ensemble Forecasting
    - Target of "Implement."
- SA-05 Climate Vulnerability Assessment
    - Targets of "Study Underway" and "Study Delivered."
- SA-05 Machine Learning techniques of Normalized Differential Vegetation Index (NDVI) and Self Organizing Maps (SOMs)
    - Targets of "NDVI Complete" and "SOMs Complete."
- ES-01 Data Integration (Foundry)

[10] Response to Data Request 2, Question 1.

[11] WMP Guidelines, page 12.

  - Targets of "Implement."
- ES-01 Distributed Sensor Operation Insights and Analytics
  - Target of "Anticipated Production Release," "Ongoing Implementation," and "Maintenance."
- ES-01 Implement new vegetation management work management software
  - Target of "Implement."
- ES-01 Quality Assurance/Quality Control: Create QA/QC process and procedure for reviewing data in the Vegetation Management database (Quality Reviews)
  - Targets of "Define Scope" and "Implement."
- ES-01 Vegetation Management and Inspections: Develop work prioritization to incorporate within MDMS
  - Targets of "Start," "Implement," and "Ongoing Implementation."
- RA-01 Model Validation and Verification
  - Targets of "Implement" and "Ongoing Maintenance."
- SA-04 Ignition Detection Systems: Wildfire Camera Coverage of HFTD/HFRA
  - Targeted percentages do not articulate what each is a percentage of.

Qualitative targets, as defined by the WMP Guidelines, provide a clear means for PacifiCorp to implement its WMP and for Energy Safety to ensure PacifiCorp is meeting the goals of that plan.

3.1.2.1 Required Remedy

PacifiCorp must revise its 2026-2028 Base WMP and provide qualitative targets for the mitigation activities in the tables below that conform to the requirements of the WMP Guidelines.[12]

PacifiCorp must provide qualitative targets that reflect the associated WMP narrative for the mitigation activities listed below.[13] The modified targets must include milestones in the appropriate tables that define specific actions PacifiCorp will take to achieve the target and demonstrate progress year-over-year until target completion. All target dates for expected completion of actions or analysis must be included.

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[12] WMP Guidelines, page A-15.

[13] The mitigation activity IDs listed above, in RN-PC-26-02, correspond to PacifiCorp's 2026-2028 Base WMP R0. Some of the IDs are used for multiple mitigation activities as described in RN-PC-26-01. In PacifiCorp's Revision Notice Response, each ID will need to be updated per PacifiCorp's response to RN-PC-26-01.

PacifiCorp must revise as described above all qualitative targets for the following mitigation activities and tables:

- VM-12 in Table 9-1,
- VM-13 in Table 9-1,
- VM-14 in Table 9-1,
- VM-15 in Table 9-1,
- SA-05 in Table 10-1,
- ES-01 in Table 12-1,
- RA-01 in Table 12-1, and
- SA-04 in Table 12-1.

3.2 Risk Methodology and Assessment

3.2.1 RN-PC-26-03: PacifiCorp must provide greater consistency in explaining components of its risk model and provide transparency into the relationship between each component.

The WMP Guidelines set forth the risk and risk components as well as the definitions that an electrical corporation must use in its Base WMP.[14] In its 2026-2028 Base WMP and supporting documents, PacifiCorp utilized multiple and sometimes incorrectly defined risk-related terms, some of which differ than those provided in the WMP Guidelines. The inconsistency is most prevalent in its definition of "ignition likelihood" and "burn likelihood," as discussed below.

The lack of consistency for these definitions makes it difficult to evaluate PacifiCorp's risk modeling methodology. Without consistent definitions, it is unclear if and how PacifiCorp is following the Guidelines requirements for including and properly utilizing risk modeling components.

3.2.1.1 Ignition Likelihood

In its Base WMP, PacifiCorp utilized multiple definitions of "ignition likelihood." For the two examples below, PacifiCorp defined "ignition likelihood" once following the WMP Guidelines and once by with its own, different definition.

[14] WMP Guidelines, pages 30-33.

- Definition that followed the WMP Guidelines:[15]
    - In Appendix A Definitions: "The total anticipated annualized number of ignitions resulting from Company owned assets at each location in the Company's service territory. This considers probabilistic weather conditions, type and age of equipment, and potential contact of vegetation and other objects with Company assets. This should include the use of any method used to reduce the likelihood of ignition."[16]
- Definition that did not follow the WMP Guidelines:
    - In Appendix B Supporting Documentation for Risk Methodology and Assessment, Summary Documentation: "Ignition Likelihood: This is the result of potential asset equipment fault, drivers causing that fault and/or ignition, and the damage that may lead to an ignition."[17]

PacifiCorp also utilized Probability of Fault (POF) interchangeably with "ignition likelihood" but provided definitions that are inconsistent. As shown below, in the definition for "ignition likelihood," PacifiCorp indicated that asset equipment fault is the first of three components that lead to an ignition, but then in the definition of POF, PacifiCorp stated that POF results in an ignition on its own:

- "Ignition likelihood (F: Probability of Fault): This is the result of potential asset equipment fault, drivers causing that fault and/or ignition, and the damage that may lead to an ignition."[18]
- POF column: "Probability that a fault results in a spark or burning material on the ground."[19]

PacifiCorp also stated that "ignition likelihood" is based on the probability of ignition (POI) *and* POF, despite using "ignition likelihood" interchangeably with POF in other portions of its Base WMP, as shown below:

- "IL=Ignition Likelihood. This is the expected risk and utilizes POF and POI."[20]

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[15] WMP Guidelines, page A-9.

[16] PacifiCorp 2026-2028 Base WMP, page 458.

[17] PacifiCorp 2026-2028 Base WMP, page 484.

[18] PacifiCorp 2026-2028 Base WMP, page 59.

[19] PacifiCorp 2026-2028 Base WMP, page 76.

[20] PacifiCorp 2026-2028 Base WMP, page 76.

Also, PacifiCorp defined "expected risk" as interchangeable with "wildfire risk."[21] Given that "ignition likelihood" is defined as "expected risk" in Section 5.2.2.1, then PacifiCorp may also be using "wildfire likelihood" and "ignition likelihood" given both are defined as "expected risk." However, the WMP Guidelines provide distinct and separate definitions for "wildfire likelihood" and "ignition likelihood," and considers "ignition likelihood" as a part of "wildfire likelihood."[22]

3.2.1.2 Burn Likelihood

PacifiCorp provided a definition of "burn likelihood" but also repeatedly used "burn likelihood" interchangeably and inconsistently with "burn probability" and "probability of ignition."

While "burn likelihood" and "burn probability" may be defined similarly, the WMP Guidelines use the term "burn likelihood" as the current terminology in wildfire risk modeling. Additionally, "burn likelihood" differs from "probability of ignition," in that "burn likelihood" is defined as the likelihood that an ignition will propagate into a wildfire, not solely the probability of an ignition occurring.

Examples of PacifiCorp's inconsistent use of "burn likelihood" are as follows:

- Definition that followed the WMP Guidelines:[23]
    - In Appendix A Definitions: "The likelihood that a wildfire with an ignition point will burn at a specific location within the service territory based on a probabilistic set of weather profiles, vegetation, and topography."[24]
- Definitions that did not follow the WMP Guidelines:
    - In Section 5.2.1 Risk and Risk Component Identification: "Burn likelihood: The POI model serves to indicate burn likelihood and is used in conjunction with the POF to obtain the wildfire LoRE."[25]
    - In Section 5.2.2.1 Likelihood of Risk Event: "Burn Likelihood (Probability of Ignition): FireSight includes a probability of ignition (POI) uses the National Fire

[21] The definition provided for "wildfire likelihood" contains "expected risk" in parenthesis, therefore implying the two are interchangeable. PacifiCorp 2026-2028 Base WMP, page 75.

[22] WMP Guidelines, page A-20: "The total anticipated annualized number of fires reaching each spatial location resulting from utility-related ignitions at each location in the electrical corporation service territory. This considers the ignition likelihood and the likelihood that an ignition will transition into a wildfire based on the probabilistic weather conditions in the area."

[23] WMP Guidelines, page A-1: "The likelihood that a wildfire with an ignition point will burn at a specific location within the service territory based on a probabilistic set of weather profiles, vegetation, and topography."

[24] PacifiCorp 2026-2028 Base WMP, page 452.

[25] PacifiCorp 2026-2028 Base WMP, page 70.

Danger Rating System (NFRDS) model. The NFRDS model utilizes fuel dryness and wind to estimate the probability of a fire starting from an ignition source. POI determines the probability that burning material will create a wildfire that requires suppression."[26]

- In Section 5.2.2.1 Likelihood of Risk Event: In the definition of Burn Likelihood, PacifiCorp uses Probability of Ignition interchangeably, "Burn Likelihood (Probability of Ignition)."[27] In Figure PAC 5-5, PacifiCorp defines Probability of Ignition as "Probability that burning…."[28]
- In Section 5.2.1 Risk and Risk Component Identification: "Burn Probability (F: Fire Spread Potential): The spread potential of fires originating at an ignition location is a function of the fire environment such as fuel, topography, and weather in the area surrounding the ignition location. "[29]

PacifiCorp failed to follow WMP Guidelines when defining terms. It also discussed and represented its risk modeling methodologies with inconsistent definitions. With PacifiCorp using overlapping terminologies, the lack of consistent naming approaches and definitions make PacifiCorp's risk modeling methodologies unclear. The pervasiveness of these inconsistent definitions indicates that PacifiCorp lacks a clear understanding of its risk model and the risk modeling framework outlined in the WMP Guidelines. The inconsistent definitions also make it difficult to determine if PacifiCorp is calculating its risk model components consistently.

PacifiCorp must implement terminology and definitions provided by the WMP Guidelines and must use consistent terminology and definitions throughout its risk modeling descriptions, so that it and Energy Safety can more effectively understand and evaluate PacifiCorp's risk modeling methodologies.

3.2.1.3 Required Remedy

PacifiCorp must update its 2026-2028 Base WMP to ensure that it consistently uses risk modeling definitions that follow the definitions provided in the WMP Guidelines, such as those for "ignition likelihood" and "burn likelihood." PacifiCorp must also consistently define any risk modeling terms it used that are not already defined within the WMP Guidelines.

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[26] PacifiCorp 2026-2028 Base WMP, page 76.

[27] PacifiCorp 2026-2028 Base WMP, page 75.

[28] PacifiCorp 2026-2028 Base WMP, page 76.

[29] PacifiCorp 2026-2028 Base WMP, page 60.

3.3 Grid Design, Operations, and Maintenance

3.3.1 RN-PC-26-04: PacifiCorp's combined targets for covered conductor and undergrounding do not allow for distinct, trackable targets.

The WMP Guidelines require that the electrical corporation's quantitative grid design, operations, and maintenance targets must "provide enough detail to effectively inform efforts to improve the performance of the electrical corporation's grid design, operations, and maintenance initiatives," and that "each activity must have distinct, trackable targets associated with the activity, even if the electrical corporation tracks targets internally with activities combined."[30]

PacifiCorp's targets for its Line Rebuild mitigation activity (GH-01) do not meet these WMP Guidelines requirements and instead combine both its covered conductor and underground work into one mitigation activity with one combined target.[31]

When discussing its "Covered Conductor Installation" work (GH-01), PacifiCorp stated that the "Line Rebuild Program will involve the installation of insulated covered conductor."[32] Later, when discussing its "Undergrounding of electric lines and/or equipment" work (GH-01), PacifiCorp discussed undergrounding, which is a different mitigation activity within the same tracking ID. PacifiCorp stated that "[u]nder the line rebuild program, PacifiCorp is also considering undergrounding."[33] While covered conductor and undergrounding are both viable wildfire mitigation activities, each is a unique and distinct mitigation activity that is considered for its risk reduction, cost effectiveness, and scope of work. By combining its 2026-2028 covered conductor and underground targets under the Line Rebuild mitigation activity, PacifiCorp's bundling of two mitigation activities did not follow the requirement that "each activity must have distinct, trackable targets."[34] PacifiCorp is tracking two mitigation activities with one set of combined targets listed under one mitigation activity (Line Rebuild) and one tracking ID (GH-01).

Further, as demonstrated in its response to Data Request 4, Question 11, PacifiCorp is tracking its covered conductor and undergrounding mitigation activities separately.

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[30] WMP Guidelines, page 81.

[31] PacifiCorp uses two names for tracking ID GH-01 in its 2026-2028 Base WMP. PacifiCorp most often used "Line Rebuild," but used "Line Rebuild - Covered Conductor Installation" in *Table PAC 3-1: PacifiCorp Tracking IDs for the 2026-2028 WMP*. PacifiCorp 2026-2028 Base WMP, page 32.

[32] PacifiCorp 2026-2028 Base WMP, page 166.

[33] PacifiCorp 2026-2028 Base WMP, page 170.

[34] WMP Guidelines, page 81.

PacifiCorp stated in its response to the data request that its 2026 undergrounding target is 9.7 miles while it has no miles planned for 2027 and 2028.[35]

PacifiCorp must provide distinct and trackable targets for each of its mitigation activities to provide Energy Safety with the detail needed to effectively evaluate and audit each of these mitigation activity efforts.

3.3.1.1 Required Remedies

PacifiCorp must revise its 2026-2028 Base WMP to provide separate targets for covered conductor and underground mitigation activities. Each mitigation activity must be distinctly named and have its own unique tracking ID and annual targets. The revisions must be reflected in the following tables and narrative sections that reference GH-01:

- *Table PAC 3-1: PacifiCorp Tracking IDs for the 2026-2028 WMP*,
- Sections 8.2.1 and 8.2.2,
- *Table 6-4: Summary of Risk Reduction for Top-Risk Circuits*,
- *Table PAC 6-1: Summary of Risk Reduction for Circuits With Maximum Fuel/Terrain Wildfire Risk Scores*,
- *Table 8-3: Grid Design, Asset Inspections, and Maintenance QA and QC Program Objectives*,
- *Table 8-4: Grid Design, Asset Inspections, and Maintenance QA and QC Activity Targets*; and
- Throughout Sections 6 and 8, as necessary.

For *Table 8-1: Grid Design, Operation, and Maintenance Targets by Year*, PacifiCorp must include the following revisions:

- Provide separate covered conductor and undergrounding mitigation activities by providing each activity with its own distinct tracking ID and annual targets.
- Provide undergrounding targets for Table 8-1 as reported in PacifiCorp's response to Data Request 4, Question 11.[36] PacifiCorp stated that its 2026 underground target is 9.7 miles; and it does not yet have miles planned for 2027 and 2028.
- Provide standalone covered conductor annual targets for Table 8-1, consistent with PacifiCorp's response to Data Request 4, Question 11.[37]

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[35] Response to Data Request 4, Question 11.

[36] Response to Data Request 4, Question 11.

[37] Targets in 2026-2028 Base WMP R0 minus the underground targets PacifiCorp provided in its Response to Data Request 4, Question 11 will become the adjusted covered conductor target.

3.3.2 RN-PC-26-05: PacifiCorp did not discuss equipment maintenance in the WMP narrative.

The WMP Guidelines require, for Equipment Maintenance and Repair, that "the electrical corporation must provide a brief narrative of maintenance activity (programs)."[38] The narrative, at a minimum, must discuss topics such as condition monitoring and maintenance strategy, among other topics for **each** equipment type listed.[39]

Instead of providing all the required information for each equipment type in its WMP, PacifiCorp stated that "PacifiCorp's maintenance activities and schedule for its assets is based on PacifiCorp's Policy 001" and generalized that, "Maintenance activities are determined and scheduled based on the equipment type, equipment use, operating rating, and the number of operations or faults the equipment encounters during service."[40]

While PacifiCorp provided a brief narrative of its maintenance activity, it did not include the required information on: capacitors, circuit breakers, connectors (including hotline clamps), conductor (including covered conductor), fuses (including expulsion fuses), distribution pole, lightning arrestors, reclosers, splices, transmission poles/towers, transformers, non-exempt equipment, pre-GO 95 legacy equipment, and other equipment not listed here.[41] PacifiCorp only provided the sweeping statements noted above on its equipment maintenance program.

For example, PacifiCorp did not discuss its maintenance strategies, replacement and repair conditions, or remediation timeframes for the various equipment types. PacifiCorp must provide the required details, per the WMP Guidelines, for Energy Safety to properly evaluate PacifiCorp's equipment maintenance program.

3.3.2.1 Required Remedy

PacifiCorp must revise its 2026-2028 Base WMP to provide the required narrative for each of the types of equipment listed in the WMP Guidelines.[42]

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[38] WMP Guidelines, pages 90-91.

[39] WMP Guidelines, page 91, emphasis added.

[40] PacifiCorp 2026-2028 Base WMP, page 214.

[41] WMP Guidelines, page 91; and PacifiCorp 2026-2028 Base WMP, pages 210-217.

[42] WMP Guidelines, page 91.

3.3.3 RN-PC-26-06: PacifiCorp's asset inspection quality assurance program does not provide targets for each of the six disparate asset inspection programs.

The WMP Guidelines require that the electrical corporation provide quality assurance and quality control (QA/QC) targets for each mitigation activity described in Sections 8.2–8.4 and provide these QA/QC targets in *Table 8-4: Grid Design, Asset Inspections, and Maintenance QA and QC Activity Targets*.[43] PacifiCorp did not establish unique targets, as required, for each individual asset inspection mitigation activity it provided in Sections 8.2–8.4. Instead, PacifiCorp gave a combined target for all six asset inspection mitigation activities into one initiative: Quality Assurance / Quality Control (Asset Inspections) (AI-12).[44]

The annual targets provided for this one QA/QC mitigation activity encompass QA/QC for its six asset inspections mitigation activities:

1. Transmission Patrol Inspections (AI-01),
2. Distribution Patrol Inspections (AI-02),
3. Transmission Detailed Inspections (AI-03),
4. Distribution Detailed Inspections (AI-04),
5. Transmission Intrusive Inspections (AI-05), and
6. Distribution Intrusive Inspections (AI-06).

Having one target for six disparate inspection activities is problematic because it results in the following for AI-12 in Table 8-4:

- Only one population size for asset inspection for each year of the WMP cycle,
- Only one sample size,
- Only one percent of sample in the HFTD,
- Only one confidence level or margin of error, and
- Only one pass rate.

Each asset inspection activity must have its own population size, sample size, percentage of samples located in the HFTD, confidence level, margin of error, and pass rate. The number of inspections vary significantly between each inspection type and the likelihood that inspections of different inspection types will pass a QA audit may vary as well.

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[43] WMP Guidelines, pages 93-95.

[44] PacifiCorp 2026-2028 Base WMP, page 220.

Also, by combining the QA/QC work for all six asset inspection mitigation activities into one QA/QC mitigation activity, PacifiCorp's inspection[45] program does not adequately ensure the quality of detailed and intrusive pole inspections. PacifiCorp performs significantly more patrol inspections (given the relatively quick drive-by nature of patrol inspections) than the up-close and time-consuming detailed and intrusive pole inspections. Given the nature of patrol inspections, they are less rigorous, require significantly less time per inspection, and thus are less likely to find quality issues. Having unique targets for detailed, intrusive, and patrol inspections will make it possible to evaluate whether PacifiCorp's QA/QC program is effectively addressing each type of inspection.

Further, conflating all inspections into one initiative may mask lower detailed or intrusive pole inspection pass rates during PacifiCorp's audit of its QA program, given their standard lower pass rate as compared with patrol inspections' pass rate. For example, each year PacifiCorp is targeting approximately:

- 12,300 transmission patrol (15 percent of all inspections),
- 54,000 distribution patrol (66 percent),
- 2,100 transmission detailed (3 percent),
- 6,000 distribution detailed (7 percent),
- 1,700 transmission intrusive pole (2 percent), and
- 5,700 distribution intrusive pole (7 percent) inspections.[46]

If the number of inspections for each mitigation activity audited is proportional to the number of audits performed, PacifiCorp could achieve an overall audit pass rate of 98 percent, even if every single transmission intrusive pole inspection failed its audit, thereby masking unsafe pass rates for intrusive pole inspections that could otherwise reveal a wildfire safety concern.

PacifiCorp states that its average 2026-2028 QA sample size is 775 inspections.[47] If the sampled inspections are proportional to the number of audits performed, PacifiCorp will audit approximately:

- 512 distribution patrol inspections,
- 116 transmission patrol,
- 20 transmission detailed,
- 57 distribution detailed,

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[45] PacifiCorp only conducts a QA program. PacifiCorp 2026-2028 Base WMP, page 220.

[46] PacifiCorp 2026-2028 Base WMP, page 188.

[47] PacifiCorp 2026-2028 WMP, page 220.

- 16 transmission intrusive pole, and
- 54 distribution intrusive pole inspections.

A global pass rate of 95 percent, PacifiCorp's target, can be achieved if 39 audits fail. In addition to the pass rate being achievable if all transmission intrusive pole inspections fail, it is also achievable if all transmission detailed inspections fail, most distribution detailed inspections fail, or most distribution intrusive pole inspections fail. Targeting and achieving a global inspection QA pass rate of 95 percent for all inspection types combined will not ensure the quality of each inspection type.

3.3.3.1 Required Remedy

PacifiCorp must revise its 2026-2028 Base WMP, *Table 8-4: Grid Design, Asset Inspections, and Maintenance QA and QC Activity Targets*, to create and populate distinct rows for each of the asset inspection mitigation activities below:

- Transmission Patrol Inspections (AI-01),
- Distribution Patrol Inspections (AI-02),
- Transmission Detailed Inspections (AI-03),
- Distribution Detailed Inspections (AI-04),
- Transmission Intrusive Inspections (AI-05), and
- Distribution Intrusive Inspections (AI-06).

3.3.4 RN-PC-26-07: Numerous PacifiCorp Grid Design, Operation, and Maintenance quantitative targets are not measurable.

The electrical corporation "uses targets to set commitments for specific activities in its WMP."[48] The WMP Guidelines define a quantitative target as a "quantifiable measurement of work."[49] The WMP Guidelines further require the electrical corporation to "list all quantitative targets it will use to track progress on its grid design, operations, and maintenance in its three-year plan, broken out by each year of the WMP cycle."[50]

In *Table 8-1: Grid Design, Operation, and Maintenance Targets by Year*, PacifiCorp provided "TBD" as the annual quantitative target for the following four mitigation activities: transmission drone (AI-08), distribution drone (AI-09), distribution infrared inspections (AI-

[48] WMP Guidelines, page 12.

[49] WMP Guidelines, page A-16.

[50] WMP Guidelines, page 81.

10), and transmission pole wrap and distribution pole wrap (GH-15).[51] Approved targets commit the electrical corporation to its wildfire mitigation work and each quantitative target provides a quantifiable measurement. "TBD" is not a quantitative target, provides no commitment, no way to measure progress, and no concrete milestone to hold PacifiCorp accountable to.

3.3.4.1 Asset Inspections "TBD" Quantitative Targets

In Table 8-1 for mitigation activities distribution infrared inspections (AI-08), transmission drone inspections (AI-09) and distribution drone inspections (AI-10), [52] PacifiCorp stated that it cannot provide a quantitative target because these activities "are currently pilots, and the targets will be set when the pilots are completed."[53]

For two of these activities (AI-09, AI-10), PacifiCorp provided thorough annual goals in response to a data request that meet the WMP Guidelines requirements for qualitative targets.[54] For example, PacifiCorp stated that, "The distribution drone inspection pilot is being planned in 2025 with the inspection plan pending approval in September 2025. The pilot inspections, pending the approval, are set to be completed on a five-year cycle on facility points on lines interconnected with the Tier 2 and Tier 3 High Fire Threat Districts (HFTD) and the High Fire Risk Area (HFRA)."[55]

If PacifiCorp cannot provide a quantitative target for a given year for each of these mitigation activities, it must remove the TBD value for quantitative targets and instead provide a qualitative target for each of these pilot mitigation activities for that year during the 2026-2028 Base WMP cycle.

3.3.4.2 Pole Wraps "TBD" Quantitative Targets

Another example in Table 8-1 of PacifiCorp providing a "TBD" quantitative target is for the distribution pole wraps (GH-15) and transmission pole wraps (GH-15) mitigation activities.[56] For these TBD targets, PacifiCorp explained that "targets for GH-15 Distribution Pole Wrap and Transmission Pole Wrap and the locations of the poles are TBD as this is reactive work."[57]

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[51] PacifiCorp 2026-2028 Base WMP, page 164.

[52] The tracking IDs for AI-07 and AI-08 are transposed in Table 8-1. PacifiCorp 2026-2028 Base WMP, page 164.

[53] PacifiCorp 2026-2028 Base WMP, page 163.

[54] WMP Guidelines, page A-15.

[55] Response to Data Request 7, Question 2.

[56] PacifiCorp 2026-2028 Base WMP, page 164.

[57] PacifiCorp 2026-2028 Base WMP, page 163.

The WMP Guidelines define a quantitative target as a "quantifiable measurement of work" and that the electrical corporation will show "progress toward completing targets."[58]

PacifiCorp has historically installed pole wraps in response to an active wildfire. "Prior to 2025, pole wraps were primarily installed as a reactive measure if/when an active wildfire was nearing PacifiCorp's system."[59] Starting in 2025, PacifiCorp began recording the location of the wraps. Currently, PacifiCorp is "evaluating the effectiveness of pole wraps during active wildfires to best determine the ideal locations to install protective wrapping on wood poles."[60] A quantitative target is a quantifiable commitment that the electrical corporation must progress towards. To include a commitment and plan such progress, PacifiCorp must first mature its pole wrapping programs for wildfire mitigation to have a framework for planning ahead before it can provide quantitative targets as defined by the WMP Guidelines in its next Base WMP.

3.3.4.3 Required Remedies

PacifiCorp must revise its 2026-2028 Base WMP *Table 8-1: Grid Design, Operation, and Maintenance Targets by Year*, for distribution infrared inspections (AI-08), transmission drone inspections (AI-09) and distribution drone inspections (AI-10) mitigation activities to provide measurable, quantitative targets for each year, and update the accompanying narrative. Or, if PacifiCorp cannot provide quantitative targets, it must provide specific and measurable qualitative targets, as reflected in its response to Data Request 7, Question 2.

PacifiCorp must revise its 2026-2028 Base WMP to remove the distribution pole wraps (GH-15) and transmission pole wraps (GH-15) mitigation activities from *Table 8-1: Grid Design, Operation, and Maintenance Targets by Year* and remove the narrative sentence on why each has a TBD target, as PacifiCorp does not currently have a definitive operational plan nor is it developing an operational plan for its pole wrap work such that it would have quantitative or qualitative targets. It must also add language from its response to Data Request 4, Question 13 on the current state of its pole wrapping and its plans for using pole wrapping as a wildfire mitigation activity.

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[58] WMP Guidelines, page A-16.

[59] Response to Data Request 4, Question 13.

[60] Response to Data Request 4, Question 13.

3.4 Vegetation Management

3.4.1 RN-PC-26-08: PacifiCorp does not prioritize vegetative work or track remediations, leaving vegetation close to energized infrastructure unremediated because of open work orders.

The WMP Guidelines state that, "Areas for continued improvement … must be addressed in the timeline directed by Energy Safety in the decision. Failure to show maturation in these areas may result in a Revision Notice or denial."[61]

In its 2026-2028 Base WMP submission, PacifiCorp did not sufficiently respond to area for continued improvement PC-23B-16 "Vegetation Management Priority Tagging."

3.4.1.1 PC-23B-16 History

2023-2025 Base WMP and Evaluation

In its Decision on PacifiCorp's 2023-2025 Base WMP,[62] Energy Safety determined that PacifiCorp's Red Dot priority tagging system did not adequately communicate varying degrees of priority for work its inspectors identify. As such, Energy Safety required, in area for continued improvement PC-23B-16,[63] for PacifiCorp to provide, in its 2026-2028 Base WMP, risk-based criteria for determining and assigning priority to work locations, a plan to operationalize the risk-based criteria, and remediation timelines for each priority level. The WMP Guidelines similarly required each electrical corporation to describe how it prioritizes work orders and to state the timelines it attaches to each priority level.

2026-2028 Base WMP and Evaluation

In its 2026-2028 Base WMP, PacifiCorp did not provide risk-based criteria for determining and assigning priority to work locations, a plan to operationalize the risk-based criteria, or remediation timelines for each priority level, as required by PC-23B-16 and the WMP Guidelines. As discussed below, PacifiCorp's failure to respond to the area for continued improvement and meet the WMP Guidelines requirement make it more likely that vegetation near its assets will contact energized infrastructure before mitigation, thereby increasing wildfire risk.

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[61] WMP Guidelines, page 11.

[62] Decision on PacifiCorp's 2023-2025 WMP, page 88.

[63] The area for continued improvement was numbered PC-23-16 at the time. Decision for PacifiCorp's 2023-2025 Base WMP, page 88.

Developing and Operationalizing Risk-based Criteria for Determining and Assigning Priority Levels

In response to PC-23B-16 and through a data request, respectively, PacifiCorp stated that it would "develop work prioritization" by 2027 and that it "is planning to operationalize work prioritization capabilities by 2027."[64, 65] These statements do not meet the requirements of PC-23B-16.

PacifiCorp did provide some components of a risk-based prioritization system.[66] PacifiCorp indicated in a data response that it "typically" addresses Level 1 condition vegetation that is likely to contact or is in contact with distribution infrastructure within 24 hours.[67] PacifiCorp also "typically" responds to vegetation showing evidence of contact with distribution infrastructure within 30-days.[68] However, PacifiCorp does not provide these criteria and timelines in its WMP.

Since February 2024, when Energy Safety assigned PacifiCorp PC-23B-16, PacifiCorp should have, as required by PC-23B-16, developed work prioritization and specific, measurable, relevant, and timebound milestones for operationalizing work prioritization capabilities. Without prioritization, vegetation that is close to energized infrastructure may continue to encroach upon and eventually contact infrastructure, increasing wildfire risk, while the work order to remediate that vegetation remains pending. PacifiCorp must develop and operationalize risk-based criteria for determining and assigning priority levels to work locations.

Developing System Capabilities for Assigning Priority and Tracking Remediation

Furthermore, PacifiCorp indicated that it does not have system capabilities to assign priority to individual trees or work locations, nor can it track remediation progress before, during, and after implementing corrective actions.[69]

To ensure it eliminates the riskiest conditions first, PacifiCorp must differentiate risk at the most granular level where risk exists, in this case, at the individual tree or plant level. PacifiCorp must be able to assign priority work at this most granular level. Additionally, the lack of remediation tracking will likely decrease the probability that PacifiCorp completes work within the timeframe its vegetation management inspectors prescribe. PacifiCorp must

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[64] PacifiCorp 2026-2028 Base WMP, page 520.

[65] Response to Data Request 4, Question 3.

[66] For example: PacifiCorp, VM Program SOP, pages 35-36; PacifiCorp, VM Program SOP, page 39.

[67] Response to Data Request 4, Question 1.

[68] Response to Data Request 4, Question 1.

[69] PacifiCorp 2026-2028 Base WMP, page 314.

develop prioritization and tracking capabilities to better address the riskiest conditions on its system. These are capabilities that Liberty and Bear Valley Electric Service already possess and have operationalized.[70, 71]

3.4.1.2 Required Remedies

PacifiCorp must revise its 2026-2028 Base WMP to:

1. Provide, in Section 9.12.1, the timelines for remediation as described in its response to Data Request 1, Question 4, and Data Request 4, Question 1.[72]
2. Provide a plan with specific, time-bound, and auditable milestones to:
    a. Develop and then operationalize risk-based criteria for determining and assigning priority levels to work locations.
    b. Allow inspectors to assign priority levels and timelines for remediation to work locations in PacifiCorp's MDMS, or similar digital work management system.
    c. Track the remediation of all vegetation-related hazards (i.e., Level 1, 2, and 3 conditions) in PacifiCorp's MDMS, or similar digital work management system.
    d. Track the number of days work orders are past due.
3. Modify, as appropriate in alignment with the above remedies, Enterprise System Targets for the following two mitigation activities in Table 12-1: "Implement new vegetation management work management software" and "Vegetation Management and Inspections: Develop work prioritization to incorporate within MDMS" as directed in RN-PC-26-02, Section 3.1.2, above.

3.5 Enterprise Systems

3.5.1 RN-PC-26-09: PacifiCorp did not provide sufficient narrative for the enterprise system requirement to discuss its asset identification process and its process for integrating 100 percent asset identification or a justification for not having this process in place.

The WMP Guidelines require that the electrical corporation provide a summary narrative that discusses how its enterprise systems contain, account, or allow for "the electrical corporation's asset identification process" and its "process for integrating 100 percent asset

[70] Liberty 2026-2028 Base WMP, pages 206-208.

[71] BVES 2026-2028 Base WMP R1, pages 221-223.

[72] Response to Data Request 1, Question 4; Response to Data Request 4, Question 1.

identification or its justification if [the process is] not currently in place."[73] By accounting in its enterprise system 100 percent of assets, the electrical corporation can utilize, maintain and replace each asset in a safe and timely manner, and reduce wildfire risk. PacifiCorp's narrative did not account for a complete asset identification process or include a justification for the lack thereof and does not meet the Guidelines requirement.

In its Base WMP, PacifiCorp stated its assets and substation data are stored in its SAP, GIS, and Maximo systems.[74] PacifiCorp explained that "Maximo and SAP are not integrated with GIS, however, there is light integration between Maximo and SAP."[75] PacifiCorp noted that it reconciles the data between the systems "through manual input" and stated that "periodic analysis is performed to ensure that the asset information in the three systems is materially aligned."[76]

Specifically, to address the WMP Guidelines requirement for 100 percent asset identification, PacifiCorp described its process in its response to Data Request 9, Question 5, as, "[D]ata from GIS is compared with data from SAP and Maximo ... If data is found to be in one system and not the other, a corresponding record will be added to ensure the systems match."[77]

The statements from its WMP and its data response, however, only account for assets already identified within PacifiCorp's disaggregated database systems. PacifiCorp's response to Data Request 10, Question 2 confirmed PacifiCorp's lack of a process for integrating 100 percent asset identification: "PacifiCorp has a process that **aims** to have 100 percent of wires asset records stored in GIS. Consistent with this process, all **identified** wires assets are stored in GIS."[78] The same general statement was provided for its SAP and Maximo systems. PacifiCorp has yet to explain its "process" to have 100 percent of asset and substation records stored within its three systems.

PacifiCorp did not discuss a process for its enterprise systems to contain, account, or allow for integrating 100 percent asset identification, or provide a justification for not having the process in place, as required by the WMP Guidelines. PacifiCorp only reconciles between its systems and by its subject matter experts, assets that are already accounted for by its GIS, SAP, or Maximo systems ("If data is found to be in one system and not the other, a

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[73] WMP Guidelines, page 167.

[74] "Currently Wires assets are stored in PacifiCorp's GIS .... SAP has wires asset information and is used for planning of asset inspections .... Maximo is the system of record for substation equipment and used for planning of substation inspections…. This information is also stored in GIS." PacifiCorp 2026-2028 Base WMP, page 438.

[75] PacifiCorp 2026-2028 Base WMP, page 438.

[76] PacifiCorp 2026-2028 Base WMP, page 438.

[77] Response to Data Request 9, Question 5.

[78] Response to Data Request 10, Question 2, emphasis added.

corresponding record will be added to ensure the systems match."[79]) PacifiCorp's process does not have a mechanism to add assets that are not captured in any of the three systems and PacifiCorp does not provide assurance that all assets are in the systems.

Operating assets in a run-to-failure manner can result in equipment failures, which can have wildfire risks. By accounting in its enterprise system 100 percent of its assets (e.g., track age, manufacturer, operating capability, repair history, inspection findings, life cycle, etc.), the electrical corporation can utilize, maintain and replace each of its assets in a safe and timely manner, thereby reducing wildfire risk.

By not fully accounting for 100 percent of its assets, PacifiCorp may be leaving wildfire risk unaddressed in its system. PacifiCorp must revise its narrative to meet the requirements of the WMP Guidelines.

3.5.1.1 Required Remedies

PacifiCorp must revise its 2026-2028 Base WMP, Section 12.2, to:

1. Provide a complete narrative of its asset identification process; and
2. Its process for integrating 100 percent of its asset identification into its enterprise systems; or
    a. It must justify why it does not have such a process in place; and
        i. It must provide milestones that are specific, measurable, relevant, and timebound to develop such a process.

[79] Response to Data Request 10, Question 1.

4. Non-Substantive Errata

Energy Safety identified non-substantive errors for PacifiCorp to correct in its revised 2026-2028 Base WMP. PacifiCorp must revise its 2026-2028 Base WMP to correct the errors identified in *Table 1, Errors in the PacifiCorp 2026-2028 Base WMP.*

Table 1. Errors in the PacifiCorp 2026-2028 Base WMP

Section	WMP Page Number	Correction or Clarification
Section 3.3 Utility Mitigation Activity Tracking ID	32	In *Table PAC 3-1: PacifiCorp Tracking IDs for the 2026-2028 WMP*, PacifiCorp named initiative GH-01 as "Line Rebuild - Covered Conductor Installation." However, throughout the remainder of its 2026-2028 Base WMP, it names GH-01 as "Line Rebuild." **PacifiCorp must use a consistent mitigation activity name for GH-01 throughout its 2026-2028 Base WMP. PacifiCorp must correct the name for GH-01 to be consistent with Section 3.1.1 of this Revision Notice.**[80]
Section 6.1.2 Risk-Informed Prioritization	122	In both *Table 5-5: Summary of Top-Risk Circuits, Segments, or Spans* and *Table 6-1: Prioritized Areas in PacifiCorp's Service Territory Based on Overall Utility Risk*, PacifiCorp listed its Top Risk Contributor values of "Max Wind Score" and then "Max Terrain Score." In Table 6-1, for circuit segment 5G21, it lists "Max Terrain Score" first and then "Max Wind Score." **PacifiCorp must correct its Associated Risk Drivers consistently in Table 6-1 as Max Wind Score and then Max Terrain Score and ensure that the correct scores are assigned to each associated risk driver.**

[80] PacifiCorp names GH-01 as "Line Rebuild" in all places except Table PAC 3-1, as noted in RN-PC-01. As part of this Revision Notice, Energy Safety is directing PacifiCorp to use two tracking IDs for its two Line Rebuild activities (covered conductor and underground). PacifiCorp's correction of GH-01 must be one of the two tracking IDs.

Section	WMP Page Number	Correction or Clarification
Section 8.1.2 Quantitative Targets	164	In *Table 8-1: Grid Design, Operation, and Maintenance Targets by Year*, in the activity ID column for Transmission Infrared Inspections (AI-07) and Distribution Infrared Inspections (AI-08) are transposed. Table 8-1 incorrectly shows the Transmission Infrared Inspections activity ID as AI-08, and AI-07 for Distribution Infrared Inspections. **PacifiCorp must correct the activity ID for Transmission Infrared Inspections and Distribution Infrared Inspections in *Table 8-1: Grid Design, Operation, and Maintenance Targets by Year*.**
Section 9.1.2 Quantitative Targets	266	PacifiCorp listed its cumulative 2028 Q3 and cumulative 2028 Q4 targets as 142 circuit miles for mitigation activity "Off-Cycle (Patrol) Inspection – Transmission (FIT)" (VM-04). In Data Request 5, Question 1,[81] PacifiCorp corrected this value to 417 miles. **PacifiCorp must correct the cumulative 2028 Q3 and cumulative 2028 Q4 targets for mitigation activity "Off-Cycle (Patrol) Inspection – Transmission (FIT)" to 417 circuit miles.**
Section 9.4 Pole Clearing *Table 9-2: Vegetation Inspections and Pole Clearing Targets/Year* *Table 9-6: Vegetative Management*	266, 310	PacifiCorp did not define the acronym "DPL" which is included in its "Pole Clearing PRC 4292 (DPL)" target VM-05 **PacifiCorp must define the acronym "DPL" which is included in its "Pole Clearing PRC 4292 (DPL)" target VM-05.**

[81] Response to Data Request 5, Question 1.

Section	WMP Page Number	Correction or Clarification
QA and QC Activity Targets		
Section 9.2.1.6 Updates	273	Within this section, PacifiCorp stated, "This initiative is in Table 9-1," and later, "This initiative is in Table 12-1." The tables mentioned are transposed. **PacifiCorp must correct its references to Tables 9-1 and 12-1 in Section 9.2.1.6.**
Section 9.11 Quality Assurance and Quality Control *Table 9-5: Vegetation Management QA and QC Program Objectives* *Table 9-6: Vegetation Management QA and QC Activity Targets*	307, 309-310	PacifiCorp did not provide a QC audit line for routine transmission tree maintenance work in *Table 9-5: Vegetation Management QA and QC Program Objectives*. PacifiCorp did not provide a QC audit line for routine transmission tree maintenance work in *Table 9-6: Vegetation Management QA and QC Activity Targets*. **PacifiCorp must include a line for routine transmission QC audit work in its Tables 9-5 and 9-6.** **PacifiCorp must include all Table 9-6 information as it pertains to PacifiCorp's post-audit of 100 percent of routine transmission tree maintenance.**

Section	WMP Page Number	Correction or Clarification
Section 9.11.2 QA/QC Procedures	311	PacifiCorp did not include the version number of its "Vegetation Management Quality Management Program Guidelines" document as required by the WMP Guidelines.[82] **PacifiCorp must include Version 1 with its "Vegetation Management Quality Management Program Guidelines" document as provided in its response to Data Request 5, Question 3.**[83]
Section 12.1.1 Qualitative Targets	436	PacifiCorp listed annual target percentages for Enterprise System mitigation activity "Ignition Detection Systems: Wildfire Camera Coverage of HFTD/HFRA" but it does not indicate the percentage of what. **PacifiCorp must provide a specific qualitative target for mitigation activity "Ignition Detection Systems: Wildfire Camera Coverage of HFTD/HFRA" by clarifying what the annual targets are a percentage of.**
Section 12.2 Summary of Enterprise Systems	438	PacifiCorp used the term "wires asset" in its Enterprise Systems used for Asset Management and Defensible Space but does not define the term. **PacifiCorp must incorporate its definition of "wires asset" in the narrative of Section 12.2 as provided in its response to Data Request 9, Question 2.**
Section 13.3 Discontinued Activities	448-449	PacifiCorp did not provide column headers in *Table 13-2: Lessons Learned from Discontinued Activities*. **PacifiCorp must provide column headers for *Table 13-2: Lessons Learned from Discontinued Activities*.**

[82] WMP Guidelines, page 120.

[83] Response to Data Request 5 Question 3.

Section	WMP Page Number	Correction or Clarification
Appendix D Areas for Continued Improvement, Emergency Preparedness Section 8.4 Equipment Maintenance and Repair	520-522 212-217	In response to PC-25U-10, PacifiCorp stated that, "By the end of 2028, PacifiCorp will discuss with other utilities their approach to fire prevention and suppression equipment to assess the Company's adequacy of resources when responding to faults or suppressing ignitions,". However, PacifiCorp's response to Data Request 4, Question 9, provides information that differs from its response to PC-25U-10. **PacifiCorp must revise its response to PC-25U-10, as reflected in Appendix D and repeated in Section 8.4, with the information provided in PacifiCorp's response to Data Request 4, Question 9.**[84]
Appendix D	526	In *Table D-1: 2025 Maturity Survey Capabilities, Categories, and Sub-Capabilities Mapped to 2026-2028 WMP Initiatives*, "Category A: Risk Assessment and Mitigation Strategy," for sub-capabilities "Comprehensiveness" and "Frequency & risk buy-down," PacifiCorp listed that "Risk-informed wildfire mitigation strategy" activity is reflected in *Table 5-6: Monetization of risk events for use in RSE calculations*. There is no "Monetization of risk events for use in RSE calculations" activity in Table 5-6. **PacifiCorp must correct the "Risk-informed wildfire mitigation strategy" activity for sub-capabilities "Comprehensiveness" and "Frequency & risk buy-down" in Table D-1.**

[84] Response to Data Request 4, Question 9.

5. Conclusion and Next Steps

PacifiCorp must submit its Revision Notice Response along with a clean revised 2026-2028 Base WMP and a redlined revised 2026-2028 Base WMP to the 2026-2028 Wildfire Mitigation Plan docket (#2026-2028-Base-WMPs).

For the critical issues identified, Energy Safety sets forth specific remedies that PacifiCorp must fully address and respond to within its Revision Notice Response.[85] PacifiCorp must also correct the non-substantive errors identified in Section 4.

Stakeholders and members of the public may submit opening and reply comments on PacifiCorp's Revision Notice Response in accordance with Section 4 of the Energy Safety Policy Division Process Guidelines,[86] pursuant to the schedule below. Opening and reply comments must be submitted to the 2026-2028 Wildfire Mitigation Plan docket (#2026-2028-Base-WMPs). Reply comments must be limited to issues raised and representations made in the opening comments.

The schedule for PacifiCorp's Revision Notice Response and Draft Decision is as follows:

PacifiCorp Revision Notice Response and Revised WMP Due	November 26, 2025
Opening Comments Due	December 11, 2025
Reply Comments Due	December 22, 2025
Energy Safety Draft Decision Issued No Later Than	February 28, 2026

[85] WMP Guidelines, pages 9-10.

[86] Policy Division Process Guidelines, pages 2-4.

Appendix A: References Table

Citation	Reference
Decision for PacifiCorp 2023-2025 Base WMP	Office of Energy Infrastructure Safety, PacifiCorp 2023-2025 Base WMP Decision, Published February 12, 2024, URL:(https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56309&shareable=true)
PacifiCorp 2026-2028 Base WMP	PacifiCorp, 2026-2028 Base Wildfire Mitigation Plan, Published July 11, 2025, URL:(https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=58907&shareable=true)
Liberty 2026-2028 Base WMP	Liberty Utilities, 2026-2028 Base Wildfire Mitigation Plan R0, Published June 27, 2025, URL:(https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=58800&shareable=true)
BVES 2026-2028 Base WMP R1	Bear Valley Electric Service, 2026-2028 Base Wildfire Mitigation Plan R1, Published July 29, 2025, URL:(https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=59075&shareable=true)
Pub. Util. Code § 8386	Public Utilities Code section 8386, Effective January 1, 2022, URL:(https://leginfo.legislature.ca.gov/faces/codes_displaySection.xhtml?sectionNum=8386.&lawCode=PUC)
Pub. Util. Code § 8386.3	Public Utilities Code section 8386.3, Effective January 1, 2022, URL:(https://leginfo.legislature.ca.gov/faces/codes_displaySection.xhtml?sectionNum=8386.3.&lawCode=PUC)
Policy Division Process Guidelines	Office of Energy Infrastructure Safety, Policy Division Process Guidelines, Published February 24, 2025, URL:(https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=58025&shareable=true)

Citation	Reference
WMP Guidelines	Office of Energy Infrastructure Safety, Wildfire Mitigation Plan Guidelines, Published February 24, 2025, URL:(https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=58026&shareable=true)
Data Guidelines	Office of Energy Infrastructure Safety, Energy Safety Data Guidelines v4.01, Published March 21, 2025, URL:(https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=58132&shareable=true)
GO 95	California Public Utilities Commission, General Order 95, Revised December 19, 2024, URL:(https://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M550/K438/550438485.pdf)
Response to Data Request 01, Question 4	PacifiCorp, Response to Data Request OEIS-P-WMP_2025-PC-01, Question 04, Published July 18, 2025, URL:(https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=58952&shareable=true)
Response to Data Request 02, Question 1	PacifiCorp, Response to Data Request OEIS-P-WMP_2025-PC-02, Question 01, Published July 24, 2025, URL:(https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=59014&shareable=true)
Response to Data Request 04, Questions 01, 09, and 11	PacifiCorp, Response to Data Request OEIS-P-WMP_2025-PC-04, Questions 01, 09, and 11, Published July 31, 2025, URL:(https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=59088&shareable=true)
Response to Data Request 05, Questions 01 and 03	PacifiCorp, Response to Data Request OEIS-P-WMP_2025-PC-05, Questions 01 and 03, Published August 4, 2025, URL:(https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=59120&shareable=true)
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715 P Street, 15th Floor
Sacramento, CA 95814
916.902.6000