

November 26, 2025

VIA OEIS E-FILING

Docket # 2026-2028-Base-WMPs

Tony Marino
Deputy Director
Office of Energy Infrastructure Safety
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RE: PacifiCorp Response to 2026-2028 Wildfire Mitigation Plan Revision Notice

Dear Deputy Director Marino,

PacifiCorp d/b/a Pacific Power (PacifiCorp or Company) submitted its 2026-2028 Base Wildfire Mitigation Plan (Base WMP) on July 11, 2025. On October 13, 2025, the Company received a Revision Notice¹ (RN) from the Office of Energy Infrastructure Safety (Energy Safety) instructing PacifiCorp to revise its Base WMP to address nine critical issues and non-substantive errata as directed by Energy Safety. In accordance with the RN and Energy Safety's Policy Division WMP Guidelines adopted on February 21, 2025, the Company submits this response, which will be filed in Energy Safety Docket #2026-2028 WMPs and posted on the Company's website:²

The submittal includes the following:

- PacifiCorp's response to the nine critical issues identified in the Revision Notice.
- Table of errata changes from the July 29 and August 22 filings, the non-substantive errata identified in the Revision Notice, the substantive errata request approved by Energy Safety November 17, and non-substantive errata identified in addressing the Revision Notice.
- Redlined 2026-2028 Base WMP Revision 1: PC_2026-2028_Base-WMP_R1_Redline (Base WMP Revision 1)
- Clean 2026-2028 Base WMP Revision 1: PC_2026-2028_Base-WMP_R1_Clean
- Appendix F Attachments: PacifiCorp Standards and Policies – R1
- Appendix G Attachments: Other Supporting Documents – R1
- Redlined Base WMP Data Tables: PacifiCorp_2026-WMP_R1_Redline
- Clean Base WMP Data Tables: PacifiCorp_2026-WMP_R1_Clean

¹ [Energy Safety Revision Notice PacifiCorp 2026-2028 Base WMP](#)

² <https://www.pacificorp.com/community/safety/wildfire-mitigation-plans.html>

The Company will also submit an updated annual WMP workbook in the #2025 Data Submissions Docket:

- PacifiCorp Cover Letter Annual Workbook PC_2026-WMP-R1
- PC_2026-WMP_R1

Table 1: Errata changes from July 29 and August 22 filings, substantive errata change approved by Energy Safety, and non-substantive errata identified in addressing Revision Notice

Date of Submission	Section	Page(s)	Correction or Change	Reason for Change	Substantive
7/29/2025	5.2.2.1	75	Removed "Expected Risk" from "Wildfire Likelihood (Expected Risk)"	Correction: The wildfire likelihood calculation is in Revision 1 how PacifiCorp calculates the Fuel/Terrain and Wind scores and is not the expected risk calculation as shown in the Revision 1 filing.	Yes
7/29/2025	5.2.2.1	76	Updated Wildfire Likelihood Calculation to $WL=POF*POI$	Clarification of calculation	Yes

Date of Submission	Section	Page(s)	Correction or Change	Reason for Change	Substantive
7/29/2025	5.2.2.1	76	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
7/29/2025	9.2.1.1	272	Changed "Overhead" to "Overview"	Corrected to align with Technical Guidelines	No
7/29/2025	9.2.1.1	273	Corrected "PacifiCorp conducts routine inspections or detailed inspections..." to "PacifiCorp conducts routine inspections also known as detailed inspections..."	Corrected for clarity	No
7/29/2025	9.2.2.1	278	Changed "Overhead" to "Overview"	Corrected to align with Technical Guidelines	No

Date of Submission	Section	Page(s)	Correction or Change	Reason for Change	Substantive
7/29/2025	9.2.3.1	281	Changed "Overhead" to "Overview"	Corrected to align with Technical Guidelines	No
7/29/2025	9.2.3.1	281	Corrected "PacifiCorp conducts routine inspections or detailed inspections..." to "PacifiCorp conducts routine inspections also known as detailed inspections..."	Corrected for clarity	No
7/29/2025	9.2.4.1	286	Changed "Overhead" to "Overview"	Corrected to align with Technical Guidelines	No
7/29/2025	9.2.5.1	289	Changed "Overhead" to "Overview"	Corrected to align with Technical Guidelines	No
7/29/2025	9.2.5.1	289	Corrected "PacifiCorp conducts non-routine inspections or patrol inspections..." to "PacifiCorp conducts non-routine inspections also known as patrol inspections..."	Corrected for clarity	No
7/29/2025	10.3.1	342	Changed tracking ID from GO-01 to SA-02	Correction to align with initiative tracking ID in Table 10-1	No
7/29/2025	11.1.1	Table 11-1	Updated page numbers in column "Section; Page number"	Corrected and updated	No
7/29/2025	11.2.1	395	Removed "the" from sentence "The PSPS Playbook is a standalone document and not part of the PacifiCorp's all hazards ERP."	Grammar	No

Date of Submission	Section	Page(s)	Correction or Change	Reason for Change	Substantive
7/29/2025	11.2.1	401	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
7/29/2025	11.2.1	402	Added "Management" to title "Emergency Management Duty Officer"	Updated to include full name of role	No
7/29/2025	11.2.1	402	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
7/29/2025	11.2.1	402	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
7/29/2025	11.2.1	403	Added "PSPS" to the incident types Wildfire intelligence Center Specialists respond to	Updated based on learnings from 2025 PSPS event in Utah	No

Date of Submission	Section	Page(s)	Correction or Change	Reason for Change	Substantive
7/29/2025	11.2.1	403	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
7/29/2025	11.2.1	403	Removed "with local" from "Serve as liaison for with local fire agencies at the field response level"	Clarity. The FERM is liaising with fire agencies managing the incident from state CIMIT to local agencies.	No
7/29/2025	11.2.1	403	Capitalized "Incident" in "Experience in Complex incident Management Teams (CIMIT) or Fire Chief, experience in service area."	Grammar	No
7/29/2025	11.2.1	403	Changes "Participated in ECC coordination meetings" to "Lead ECC activities"	Clarified ECC Executive's role	No
7/29/2025	11.2.1	405	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
7/29/2025	11.2.1	Figure PAC 11-2	Replaced "Seminar" with "Workshop"	Updated to align with discussion of "workshops below figure"	No
7/29/2025	11.2.1	208	Removed "Seminars" section from narrative.	Clarity	No

Date of Submission	Section	Page(s)	Correction or Change	Reason for Change	Substantive
7/29/2025	11.3.1	Table 11-3	Added Quartz Valley Indian Reservation	Table updated to reflect recent PacifiCorp engagement with Quartz Valley Indian Reservation	No
7/29/2025	11.3.1	Table 11-5	Added Quartz Valley Indian Reservation	Table updated to reflect recent PacifiCorp engagement with Quartz Valley Indian Reservation	No
7/29/2025	11.3.1	Table 11-5	Added "Wildfire" to row for Tolowa Dee-in' Tribe	Grammar	No
7/29/2025	11.3.3	Table 11-7	Added Quartz Valley Indian Reservation	Table updated to reflect recent PacifiCorp engagement with Quartz Valley Indian reservation	No
7/29/2025	Appendix B	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	No
8/22/2025	6.2.1.1	139	Changed "For example, if the PacifiCorp expects to achieve a 10%..." to "For example, if PacifiCorp expects to achieve a 10%,,"	Grammar	No

Date of Submission	Section	Page(s)	Correction or Change	Reason for Change	Substantive
8/22/2025	6.2.1.2	141	Changed "Small values can require decades of data collection to statistically prove something, therefore..." to "Small values can require decades of data collection to statistically prove something; therefore ..."	Grammar	No
8/22/2025	8.1.2	163	Changed "Similarly the targets for GH-15 Distribution Pole Wrap and Transmission Pole Wrap and the locations of the poles are TBD as this is reactive work." to "Similarly, the targets for GH-15 Distribution Pole Wrap and Transmission Pole Wrap and the locations of the poles are TBD as this is reactive work."	Grammar	No
8/22/2025	9.2.1.1	272	Changed "PacifiCorp conducts routine inspections also known as detailed inspections..." to "PacifiCorp conducts routine inspections, also known as detailed inspections..."	Grammar	No
8/22/2025	11.1.1	401	Changed "Response managers will work with the Wildfire intelligence Center..." to "Response managers will work with the Wildfire Intelligence Center..."	Grammar	No

Date of Submission	Section	Page(s)	Correction or Change	Reason for Change	Substantive
8/22/2025	11.4	420	Changed "PacifiCorp will conduct outreach to adjacent utilities as appropriate based on the events circumstances." to "PacifiCorp will conduct outreach to adjacent utilities as appropriate based on the event circumstances."	Grammar	No
8/22/2025	Appendix D	429	Changed "Whether the condition should have been classified as an imminent threat;" to "Whether the condition should have been classified as an imminent threat."	Grammar	No
8/22/2025	Appendix D	429	Changed "Whether the originally assigned remediation timeframe was appropriate given the nature of the condition;" to "Whether the originally assigned remediation timeframe was appropriate given the nature of the condition."	Grammar	No
8/22/2025	Appendix D	430	Changed "Threat classification validity;" to "Threat classification validity."	Grammar	No
8/22/2025	Appendix D	430	Changed "Appropriateness of assigned remediation timelines;" to "Appropriateness of assigned remediation timelines."	Grammar	No
8/22/2025	WMP	221-538	Updated footer to PacifiCorp 2026-2028 Base Wildfire Mitigation Plan R0 July 11, 2025	Corrected for consistent footer in the WMP	No

Date of Submission	Section	Page(s)	Correction or Change	Reason for Change	Substantive
11/26/2025	Appendix G	555	In its Decision on PacifiCorp's 2025 WMP Update, Energy Safety directed PacifiCorp to provide a plan to engage a third party to audit all Level 1 conditions identified from 2020 to 2023. In the 2026-2028 WMP, PacifiCorp committed to completing the third-party audit required in PC-25U-07 by the end of 2025. The work is now complete. PacifiCorp has revised its 2026–2028 WMP to demonstrate completion of the audit and has included the report provided by third-party auditor Qualus, as part of the revised WMP in Appendix G.	This correction allows PacifiCorp to show fulfillment of Area for Continued Improvement PC-25U-07. This substantive errata request was approved by the Office of Energy Infrastructure Safety on November 17, 2025.	Yes
11/26/2025	3.3	32	Changed the initiative name for CO-03 from "Collaborate on Local Wildfire Mitigation Planning" to "Develop and update wildfire de-energization materials for customers to communicate PacifiCorp Emergency De-Energization for Wildfire"	This correction allows PacifiCorp to better align the initiative name to the initiative activity.	No
11/26/2025	8.3	193	Changed "Table 8-3 below presents PacifiCorp's asset inspection..." to "Table 8-2 below presents PacifiCorp's asset inspection..."	Corrected for accurate Table Reference	No
11/26/2025	11.4	428	Updated Initiative Tracking ID from CO-01 to CO-05 and CO-06	Corrected for updated Initiative Tracking IDs	No
11/26/2025	11.4.1	430	Updated Initiative Tracking ID from CO-01 to CO-05, CO-06, CO-7, CO-08, CO-09, CO-10	Corrected for updated Initiative Tracking IDs	No

Date of Submission	Section	Page(s)	Correction or Change	Reason for Change	Substantive
11/26/2025	11.4.2	440	Updated Initiative Tracking ID from CO-01 to CO-05, CO-08, CO-09, CO-10	Corrected for updated Initiative Tracking IDs	No
11/26/2025	11.4.4	444	Updated Initiative Tracking ID from CO-02 to CO-08, CO-09, CO-10	Corrected for updated Initiative Tracking IDs	No
11/26/2025	8.8	275	Added Initiative Tracking ID: GH-14	Incorporated the Initiative Tracking ID to ensure clear and consistent linkage between narrative and initiative.	No
11/26/2025	9.6.1	312	Added Initiative Tracking ID: VM-25	Incorporated the Initiative Tracking ID to ensure clear and consistent linkage between narrative and initiative.	No
11/26/2025	9.6.4	312	Added Initiative Tracking ID: VM-26	Incorporated the Initiative Tracking ID to ensure clear and consistent linkage between narrative and initiative.	No
11/26/2025	9.11.1	321	Added Initiative Tracking ID: ES-06	Incorporated the Initiative Tracking ID to ensure clear and consistent linkage between narrative and initiative.	No
11/26/2025	12.2	457	Added Initiative Tracking ID: ES-02	Incorporated the Initiative Tracking ID to ensure clear and consistent linkage between narrative and initiative.	No

Date of Submission	Section	Page(s)	Correction or Change	Reason for Change	Substantive
11/26/2025	8.1.2	168-169	Updated Table 8-1 page numbers in column "Section; Page Number"; updated section numbers in column "Section; Page Number" for AI-07, AI-08 entries	Updated tables to include current page number and section references.	No
11/26/2025	9.1.1	280-281	Updated Table 9-1 page numbers in column "Section; Page Number"; updated section number in column "Section; Page Number" for VM-12 entry	Updated tables to include current page number and section references.	No
11/26/2025	9.1.2	283-284	Updated Table 9-2 page numbers in column "Section; Page Number"	Updated tables to include current page number and section references.	No
11/26/2025	10.1.2	344	Updated Table 10-1 page numbers in column "Section; Page Number"; updated section number in column "Section; Page Number" for SA-01,SA-07,SA-08.SA-09 entries	Updated tables to include current page number and section references.	No
11/26/2025	11.1.1	398-399	Updated Table 11-1 page numbers in column "Section; Page Number"; updated section numbers in column "Section; Page Number" for CO-05, CO06, CO-07, CO-08, CO-09, CO-10, CO-03, EP-02 entries	Updated tables to include current page number and section references.	No
11/26/2025	12.1	455	Updated Table 12-1 page numbers in column "Section; Page Number"; updated section numbers in column "Section; Page Number" for ES-04, ES-06, RA-01 entries	Updated tables to include current page number and section references.	No
11/26/2025	WMP	457	Updated page numbers in TOC and Tables/Figures tables	Updated tables to include current page number and section references.	No

Date of Submission	Section	Page(s)	Correction or Change	Reason for Change	Substantive
11/26/2025	4.3	46	Added period after "PacifiCorp 2026-2028 WMP Additional Maps"	Grammar	No
11/26/2025	5.5.1.1	99	Added period after "PacifiCorp 2026-2028 WMP Additional Maps"	Grammar	No

Table 2: Non-substantive errata identified in the Revision Notice

Date of Submission	Section	Page(s)	Energy Safety Correction or Clarification Requested	Correction or Clarification	Substantive
11/26/2025	3.3	Throughout WMP	<p>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.”</p> <p>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.</p>	PacifiCorp has revised its 2026-2028 Base Wildfire Mitigation Plan Revision 1 to consistently use “Line Rebuild - Covered Conductor Installation" for initiative GH-01 throughout and to be consistent with Section 3.1.1 of the Energy Safety Revision Notice.	No

Date of Submission	Section	Page(s)	Energy Safety Correction or Clarification Requested	Correction or Clarification	Substantive
11/26/2025	6.1.2	123-124	<p>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."</p> <p>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.</p>	PacifiCorp has revised Table 6-1 in its 2026-2028 Base Wildfire Mitigation Plan Revision 1 to ensure Max Wind Score and Max Terrain Score are consistently ordered and ensure the correct scores are assigned to each associated risk driver.	No

Date of Submission	Section	Page(s)	Energy Safety Correction or Clarification Requested	Correction or Clarification	Substantive
11/26/2025	8.1.2	168-169	<p>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.</p> <p>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.</p>	PacifiCorp has revised Table 8-1 in its 2026-2028 Base Wildfire Mitigation Plan Revision 1 to correct the activity ID for Transmission Infrared Inspections and Distribution Infrared Inspections.	No

Date of Submission	Section	Page(s)	Energy Safety Correction or Clarification Requested	Correction or Clarification	Substantive
11/26/2025	9.1.2	283-284	<p>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, PacifiCorp corrected this value to 417 miles.</p> <p>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.</p>	<p>PacifiCorp has revised Table 9-2 in its 2026-2028 Base Wildfire Mitigation Plan Revision 1 to correct the cumulative 2028 Q3 and cumulative 2028 Q4 targets for mitigation activity “Off Cycle (Patrol) Inspection – Transmission (FIT)” to 417 circuit miles.</p>	No
11/26/2025	9.4	19	<p>PacifiCorp did not define the acronym “DPL” which is included in its "Pole Clearing PRC 4292 (DPL)" target VM-05.</p> <p>PacifiCorp must define the acronym “DPL” which is included in its "Pole Clearing PRC 4292 (DPL)" target VM-05.</p>	<p>PacifiCorp has revised its 2026-2028 Base Wildfire Mitigation Plan Revision 1 to include the definition of the acronym "DPL," Distribution Pole Clearing, to the Acronyms and Glossary table on page 19.</p>	No

Date of Submission	Section	Page(s)	Energy Safety Correction or Clarification Requested	Correction or Clarification	Substantive
11/26/2025	9.2.1.6	290	<p>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.</p> <p>PacifiCorp must correct its references to Tables 9-1 and 12-1 in Section 9.2.1.6.</p>	PacifiCorp has revised its 2026-2028 Base Wildfire Mitigation Plan Revision 1 to correct the references to Tables 9-1 and 12-1 in the accurate location in Section 9.2.1.6	No
11/26/2025	9.11	325 & 327	<p>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.</p> <p>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.</p> <p>PacifiCorp must include a line for routine transmission QC audit work in its Tables 9-5 and 9-6.</p> <p>PacifiCorp must include all Table 9-6 information as it pertains to PacifiCorp’s post-audit of 100 percent of routine transmission tree maintenance.</p>	<p>PacifiCorp has revised Table 9-5 in its 2026-2028 Base Wildfire Mitigation Plan Revision 1 to include a row for Routine Transmission Tree maintenance, including the Tracking ID and program objective.</p> <p>PacifiCorp has revised Table 9-6 to include a row for QC audit of its Routine Transmission (Detailed) Tree Maintenance work with full activity targets for 2026-2028.</p>	No

Date of Submission	Section	Page(s)	Energy Safety Correction or Clarification Requested	Correction or Clarification	Substantive
11/26/2025	9.11.2	329	<p>PacifiCorp did not include the version number of its “Vegetation Management Quality Management Program Guidelines” document as required by the WMP Guidelines.</p> <p>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.</p>	PacifiCorp has updated the narrative in its 2026-2028 Base Wildfire Mitigation Plan Revision 1 to include "Version 1" page 329.	No

Date of Submission	Section	Page(s)	Energy Safety Correction or Clarification Requested	Correction or Clarification	Substantive
11/26/2025	12.1.1	455	<p>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.</p> <p>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.</p>	<p>PacifiCorp has revised Table 12-1 in its 2026-2028 Base Wildfire Mitigation Plan Revision 1 to reflect new units and targets for Ignition Detection Systems. The updated units are Total Wildfire Cameras Installed in HFTD/HFRA. The revised targets are 10 in each year from 2026-2028. As of 2025, there are eight wildfire cameras installed in the HFTD/HFRA. The location of the two planned installations in 2026 is dependent on alignment with program objectives and goals.</p>	No
11/26/2025	12.2	466	<p>PacifiCorp used the term “wires asset” in its Enterprise Systems used for Asset Management and Defensible Space but does not define the term.</p> <p>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.</p>	<p>PacifiCorp has revised the narrative in Section 12.2 of its 2026-2028 Base Wildfire Mitigation Plan Revision 1 to remove references to "wire assets."</p>	No

Date of Submission	Section	Page(s)	Energy Safety Correction or Clarification Requested	Correction or Clarification	Substantive
11/26/2025	13.3	467-468	<p>PacifiCorp did not provide column headers in Table 13-2: Lessons Learned from Discontinued Activities.</p> <p>PacifiCorp must provide column headers for Table 13-2: Lessons Learned from Discontinued Activities.</p>	PacifiCorp has revised Table 13-2 in its 2026-2028 Base Wildfire Mitigation Plan Revision 1 to ensure the column headers are visible.	No
11/26/2025	8.4 and Appendix D	231 & 539-540	<p>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 PC25U-10.</p> <p>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.</p>	PacifiCorp has revised the narrative in section 8.4 and Appendix D in its 2026-2028 Base Wildfire Mitigation Plan Revision 1 to include additional information about the how the Company has begun evaluating the practices of both California IOUs and other investor-owned utilities, related to fire prevention and suppression equipment.	No

Date of Submission	Section	Page(s)	Energy Safety Correction or Clarification Requested	Correction or Clarification	Substantive
11/26/2025	Appendix D	544	<p>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.</p> <p>PacifiCorp must correct the “Risk-informed wildfire mitigation strategy” activity for sub-capabilities “Comprehensiveness” and “Frequency & risk buydown” in Table D-1.</p>	<p>PacifiCorp has not made any revisions to its 2026-2028 Base Wildfire Mitigation Plan Revision 1, as the original filing of the WMP included references in Table D-1 to Table 5-6. Monetization of risk events for use in RSE calculations under both the column headings “5. Risk event tracking and integration of lessons learned” and “6. Risk-informed wildfire mitigation strategy.”</p>	No

Sincerely,



Robert Meredith
Director, Regulation

Response to Revision Notice

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

Description: 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.” The Energy Safety Data Guidelines define a tracking ID as, “The unique tracking ID for a given WMP mitigation activity.” 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.”

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

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.

Response: In response to Critical Issue RN-PC-26-01, PacifiCorp has updated its 2026-2028 Base Wildfire Mitigation Plan (WMP) to assign unique tracking IDs to each mitigation activity that was previously grouped under a single tracking ID. This update ensures compliance with the Energy Safety Data Guidelines requiring unique tracking IDs for each mitigation activity.

The following tracking IDs identified in the Revision Notice have been revised so that each initiative now has a unique tracking ID:

- AI-12 (Quality Assurance / Quality Control (QA/QC) (Asset Inspections))
 - Transmission Patrol Inspections (AI-14)
 - Distribution Patrol Inspections (AI-15)
 - Transmission Detailed Inspections (AI-16)
 - Distribution Detailed Inspections (AI-17)
 - Transmission Intrusive Inspections (AI-18)
 - Distribution Intrusive Inspections (AI-19)
- SA-02 (Grid Monitoring Systems)
 - Installation of cFCI (SA-07)
 - Installation of SCAN (SA-08)
 - Distribution Protective Settings Review (SA-09)
 - Installation of Advanced AMI Meters (SA-10)
- SA-05 (Weather Forecasting)
 - Situational Awareness Tools and Models (SA-11)

- Implement WRF Ensemble Forecasting (SA-12)
 - Climate Vulnerability Assessment (SA-13)
 - Machine Learning Techniques of NDVI and SOMs (SA-14)
- VM-02 (Vegetation Inspections: Detailed Inspection – Transmission)
 - Routine (Detailed) Inspection – Local Transmission (VM-16)
 - Routine (Detailed) Inspection – Main Grid (VM-17)
 - Pole Clearing PRC 4292 (DPL) (VM-18)
 - Pole Clearing (LRA) (VM-19)
- VM-11 (Quality Assurance / Quality Control (Vegetation))
 - Routine Distribution (Detailed) (VM-20)
 - Off-cycle Distribution (Patrol) (VM-22)
 - Non-Routine Transmission (Patrol) (VM-23)
 - Pole Clearing (VM-24)
- VM-13 (Substation Defensible Space)
 - Substation Defensible Space (VM-25)
- Develop hazard tree process for trees outside of substation property (VM-26)
 - VM-14 (Integrated Vegetation Management)
 - Develop a process for conducting outreach to known nurseries participating in the tree replacement program (VM-27)
 - Review and identify opportunities to expand use of tree growth regulator (VM-28)
- CO-01 (Public Outreach and Education Awareness Program)
 - Conduct pre-season and post-season customer surveys (CO-05)
 - Create a way for non-account holders to register for outage/emergency alerts (CO-06)
- CO-02 (Engagement with Access and Functional Needs Populations)
 - Continue to identify customers who are Electricity Dependent (CO-07)
 - Coordinate and integrate resources with state, community and utility to minimize duplication of AFN programs (CO-08)
 - Identify enhancements to programs and resources needed to mitigate impacts of PSPS on AFN customers (CO-09)
- ES-01 (Enterprise Systems Development)
 - Business Transformation Wave 4: Maximo (ES-02)
 - Data Integration (Foundry) (ES-03)
 - Distributed Sensor Operation Insights and Analytics (ES-04)
 - Implement new vegetation management work management software (ES-05)
 - Create QA/QC process and procedure for reviewing data in Vegetation Management database (ES-06)

- Develop work prioritization to incorporate within Mobile Data Management System (MDMS) (ES-07)

All relevant narrative sections and tables referencing these tracking IDs have been updated to ensure consistency and clarity. Each mitigation activity now has distinct, trackable targets associated with its unique tracking ID.

These updates, including the revised Table PAC 3-1, are critical for Energy Safety's tracking and evaluation of mitigation progress.

Please refer to the Base WMP Revision 1 for the detailed revisions.

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

Description: The WMP Guidelines state that targets are used to “track the electrical corporation’s completion of the activities in its approved WMP.” 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.”

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.

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.

PacifiCorp must provide qualitative targets that reflect the associated WMP narrative for the mitigation activities listed below. 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.

PacifiCorp must revise as described above all qualitative targets for the specified mitigation activities and tables.

Response: In response to Critical Issue RN-PC-26-02, PacifiCorp has provided specific, measurable qualitative targets for the identified initiatives in Revision 1 of the 2026-2028 Base Wildfire Mitigation Plan (WMP). The specific initiatives and their updated targets are detailed as follows:

- **Table 9-1:** Initiatives VM-12 (Wood and Slash Management), VM-15 (Workforce Planning - Vegetation Management), VM-26 (Defensible Space: Hazard Tree Process), VM-27 (Integrated Vegetation Management Outreach), and VM-28 (Integrated Vegetation Management Tree Growth Regulator Expansion)
- **Table 10-1:** Initiatives SA-12 (Implement WRF Ensemble Forecasting), SA-13 (Climate Vulnerability Assessment), and SA-14 (Machine Learning Techniques of NDVI and SOMs)
- **Table 12-1:** Initiatives ES-03 (Data Integration - Foundry), ES-04 (Distributed Sensor Operation Insights and Analytics), ES-05 (Implement New Vegetation Management Work Management Software), ES-06 (Create QA/QC Process for Vegetation Management Database), and ES-07 (Develop Work Prioritization within MDMS)

Additionally, Initiative SA-04 (Ignition Detection Systems: Total Wildfire Cameras Installed in HFTD/HFRA) now includes quantitative targets.

Please refer to the Base WMP Revision 1 for the detailed revisions.

Critical Issue 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.

Description: 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. In its 2026-2028 Base WMP and supporting documents, PacifiCorp utilized multiple and sometimes incorrectly defined risk-related terms, some of which differ from 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.

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.

Response: In response to Critical Issue RN-PC-26-03, PacifiCorp has updated Section 5.2.1 of Revision 1 of its 2026-2028 Base Wildfire Mitigation Plan (WMP) to improve consistency and transparency in explaining the components of its risk model. The updated narrative aligns

terminology and definitions with those provided in the WMP Guidelines and Appendix A of the Base WMP. Specifically, PacifiCorp has made the following clarifications and consistent uses of terms:

- Likelihood of a Risk Event (LoRE) and Consequence of a Risk Event (CoRE) are now used consistently throughout the risk model narrative.
- Ignition Likelihood is clarified as the probability that a circuit will experience a fault under specific weather conditions on a given day, with explanation of how different risk and fault models contribute to this metric.
- Burn Probability is clearly defined as the model output used to indicate the probability of fire spread from an ignition.
- Wildfire Consequences are described in detail, including how they are modeled and calculated.
- Wildfire Likelihood is clarified in terms of its calculation and relationship to other risk components.
- Burn Likelihood is explained as the component used to derive the overall probability of a wildfire event.

Please refer to the Base WMP Revision 1 for the detailed revisions.

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

Description: 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.”

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.

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.

PacifiCorp must provide qualitative targets that reflect the associated WMP narrative for the mitigation activities listed below. 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.

PacifiCorp must revise as described above all qualitative targets for the specified mitigation activities and tables.

Response: In response to Critical Issue RN-PC-26-04, PacifiCorp has revised its 2026-2028 Base Wildfire Mitigation Plan (WMP) to provide distinct and trackable targets for its covered conductor and undergrounding mitigation activities, which were previously combined under a single tracking ID (GH-01).

Specifically, PacifiCorp has:

- Separated the Line Rebuild mitigation activity (GH-01) into two distinct initiatives with unique tracking IDs:
 - GH-01 – Line Rebuild – Covered Conductor Installation
 - GH-16 – Undergrounding of Electric Lines and/or Equipment
- Updated Table PAC 3-1: PacifiCorp Tracking IDs for the 2026-2028 WMP to reflect these distinct tracking IDs.
- Revised all relevant tables and narrative sections:
 - Sections 8.2.1 and 8.2.2
 - Table 6-4: Summary of Risk Reduction for Top-Risk Circuits
 - Table 8-1: Grid Design, Operation, and Maintenance Targets by Year
 - 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
- Developed qualitative targets with specific milestones for each mitigation activity.

Please refer to the Base WMP Revision 1 for the detailed revisions.

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

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

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.”

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.

Response: In response to Critical Issue RN-PC-26-05, PacifiCorp has revised its 2026-2028 Base Wildfire Mitigation Plan (WMP) to provide a comprehensive narrative addressing equipment maintenance and repair activities, as required by the WMP Guidelines.

Specifically, PacifiCorp has:

- Expanded the maintenance narrative to include detailed descriptions for each of the following equipment types listed in the WMP Guidelines:
 - Capacitors
 - Circuit breakers
 - Connectors, including hotline clamps
 - Conductors, including covered conductor
 - Fuses, including expulsion fuses
 - Distribution poles
 - Lightning arrestors
 - Reclosers
 - Splices
 - Transmission poles/towers
 - Transformers
 - Non-exempt equipment
 - Pre-GO 95 legacy equipment
- Included information on condition monitoring methods, maintenance strategies (e.g., preventive, reliability-centered), replacement and repair criteria, and remediation timeframes for each equipment type.
- Incorporated references to applicable company policies, such as PacifiCorp’s Policy 001, and relevant regulatory standards.

Please refer to the Base WMP Revision 1 for the detailed revisions.

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

Description: 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. 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).

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.

Response: In response to Critical Issue RN-PC-26-06, PacifiCorp has revised its 2026-2028 Base Wildfire Mitigation Plan (WMP) to provide distinct quality assurance and quality control (QA/QC) targets for each of the six disparate asset inspection mitigation activities, as required by the WMP Guidelines.

Specifically, PacifiCorp has:

- Updated Table 8-4: Grid Design, Asset Inspections, and Maintenance QA and QC Activity Targets to create and populate separate rows for each of the following asset inspection mitigation activities:
 - Transmission Patrol Inspections (AI-14)
 - Distribution Patrol Inspections (AI-15)
 - Transmission Detailed Inspections (AI-16)
 - Distribution Detailed Inspections (AI-17)
 - Transmission Intrusive Inspections (AI-18)
 - Distribution Intrusive Inspections (AI-19)
- Developed QA/QC targets for each activity, including population sizes, sample sizes, confidence levels, margins of error, and pass rate targets.

Please refer to the Base WMP Revision 1 for the detailed revisions.

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

Description: The electrical corporation “uses targets to set commitments for specific activities in

its WMP.” The WMP Guidelines define a quantitative target as a “quantifiable measurement of work.” 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.”

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-10), and transmission pole wrap and distribution pole wrap (GH-15). 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.

Remedy: 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.

Response: In response to Critical Issue RN-PC-26-07, PacifiCorp has revised its 2026-2028 Base Wildfire Mitigation Plan (WMP) to address the issue of numerous quantitative targets in Table 8-1: Grid Design, Operation, and Maintenance Targets by Year that were previously listed as “TBD” and therefore not measurable.

Specifically, PacifiCorp has:

- Revised Table 8-1 to provide measurable, quantitative targets for the following mitigation activities:
 - Transmission Drone Inspections (AI-07)
 - Distribution Drone Inspections (AI-09)
 - Distribution Infrared Inspections (AI-10)

- Updated the accompanying narrative sections to reflect these measurable targets, including specific milestones and progress indicators for each year of the 2026-2028 WMP cycle.
- Removed the Distribution Pole Wrap and Transmission Pole Wrap mitigation activities (GH-15) from Table 8-1, as PacifiCorp currently does not have a definitive operational plan for pole wraps and is not developing quantitative or qualitative targets for this activity at this time.
- Included updated language in the narrative, consistent with PacifiCorp’s response to Data Request 4, Question 13, describing the current state of pole wrapping and plans for its use as a wildfire mitigation activity.

Please refer to the Base WMP Revision 1 for the detailed revisions.

Critical Issue 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.

Description: 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.”

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

Remedy: 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.

Response: In response to Critical Issue RN-PC-26-08, PacifiCorp has revised its 2026-2028 Base Wildfire Mitigation Plan (WMP) to address the lack of prioritization and tracking of vegetation-related work orders, which previously left vegetation close to energized infrastructure unremediated.

Specifically, PacifiCorp has:

- Provided, in Section 9.12.1, detailed timelines for remediation consistent with its responses to data requests OEIS-P-WMP 2025-PC-01, Question 4 and OEIS-P-WMP-PC-004, Question 1.
- Developed a comprehensive plan with specific, time-bound, and auditable milestones to:
 - Develop and operationalize risk-based criteria for determining and assigning priority levels to vegetation work locations.
 - Enable inspectors to assign priority levels and remediation timelines to work locations within PacifiCorp’s Mobile Data Management System (MDMS) or a similar digital work management system.
 - Track the remediation progress of all vegetation-related hazards (Level 1, 2, and 3 conditions) within the MDMS or similar system.
 - Monitor and report the number of days work orders remain past due.
- Updated Enterprise System Targets in Table 12-1 for the following mitigation activities to align with the above remedies:
 - Implement new vegetation management work management software.
 - Vegetation Management and Inspections: Develop work prioritization to incorporate within MDMS.

Please refer to the Base WMP Revision 1 for the detailed revisions.

Critical Issue 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.

Description: 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 identification or its justification if [the process is] not currently in place.” 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.

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

Provide a complete narrative of its asset identification process; and

1. 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.

Response: In response to Critical Issue RN-PC-26-09, PacifiCorp has provided additional explanation in Section 12.2 of Revision 1 of the 2026-2028 Base Wildfire Mitigation Plan (WMP) to clarify the enterprise systems used to manage PacifiCorp's assets and the processes in place to identify and correct incomplete or incorrect information in these systems.

Specifically, PacifiCorp describes the enterprise systems that support asset management, including SAP, Maximo, and a mainframe, and how these systems collectively track all assets deemed critical, including but not limited to distribution poles, transmission structures, pad-mounted and underground equipment, substation power transformers, circuit breakers, reclosers, and relays. Asset changes are entered into the mainframe, which serves as a comprehensive and current repository of critical assets.

PacifiCorp also describes the processes used to identify when asset records are found to be incorrect or incomplete. Due to ongoing construction, restoration, and other field activities, occasional variances between asset data in the enterprise systems and actual assets in the field may occur. PacifiCorp corrects such variances when they become apparent, primarily as a result of its cyclical inspections of line assets.

Please refer to the Base WMP Revision 1 for the detailed revisions.