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RE: CA 2025-WMPs
OEIS-P-WMP_2025-PC-15

Please find enclosed PacifiCorp's Responses to OEIS Data Requests 15.1-15.4.

If you have any questions, please call me at (503) 813-7314

Sincerely,

____ /s/ ____
Pooja Kishore
Manager, Regulation

OEIS Data Request 15.1

Regarding Risk Modeling of HFTD:

- (a) Does PacifiCorp's risk model that is used to provide the results provided in its 2026-2028 Base WMP, model its entire California service territory, just the HFTD, or some other area?
 - i. If PacifiCorp's risk model only covers the HFTD, explain how PacifiCorp determined its HFRA.
- (b) In PacifiCorp's response to data request 11, question 1, it states, "Activities regarding risk modeling ... are performed for the total territory and do not differentiate between the High Fire Threat District (HFTD) and non-HFTD."¹
 - i. What does PacifiCorp mean by "total territory" (e.g., PacifiCorp's California service territory? PacifiCorp's six-state service territory? Other?)
 - ii. Explain which risk modeling activities are included for the "total territory" versus the HFTD, if there is any difference.

Response to OEIS Data Request 15.1

- (a) PacifiCorp's risk model uses FireSight data for distribution and transmission assets throughout its entire California service territory, not just the high fire threat district (HFTD).
 - i. Not applicable.
- (b) Please refer to the Company's responses to subparts i. and ii. below:
 - i. Please refer to the Company's response to subpart (a) above.
 - ii. Not applicable.

¹ PacifiCorp [response to Data Request 11](#), Published October 3, 2025,
URL:(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=59468&shareable=true>).

Despite PacifiCorp's diligent efforts, certain information protected from disclosure by the attorney-client privilege or other applicable privileges or law may have been included in its responses to these data requests. PacifiCorp did not intend to waive any applicable privileges or rights by the inadvertent disclosure of protected information, and PacifiCorp reserves its right to request the return or destruction of any privileged or protected materials that may have been inadvertently disclosed. Please inform PacifiCorp immediately if you become aware of any inadvertently disclosed information.

OEIS Data Request 15.2

Regarding Grid Hardening in PacifiCorp's HFRA and HFTD: Provide the percentage of grid hardening work planned in each of the following categories, based on total annual grid hardening circuit mileage planned in PacifiCorp's California service territory:

	Undergrounding			Covered Conductor		
	HFTD	HFRA	Non-HFTD HFRA	HFTD	HFRA	Non-HFTD HFRA
2026						
2027						
2028						

Response to OEIS Data Request 15.2

Please refer to the table below for the percentage of grid hardening work planned in each of the table categories:

	Undergrounding			Covered Conductor		
	HFTD	HFRA	Non-HFTD HFRA	HFTD	HFRA	Non-HFTD HFRA
2026	100%	0%	0%	75%	25%	0%
2027	100%	0%	0%	60%	40%	0%
2028	100%	0%	0%	50%	50%	0%

HFTD – high fire threat district

HFRA – high fire risk area

OEIS Data Request 15.3

Regarding the Qualus Audit of Priority A conditions: In Attachment G to its 2026-2028 Base WMP R1, PacifiCorp submitted an external audit of priority A conditions created from 2020-2023.¹ Of the 581 priority A conditions reviewed, all were found to have been properly classified, and all conditions that were PacifiCorp's responsibility to remediate were corrected on time. None of the 581 conditions were found to meet the requirements of a Level 1 condition. In its 2023 Q4 QDR submission PacifiCorp reported 103 wire-down events from 2020-2023.

- (a) Were the 103 wire-down events reported by PacifiCorp included in the audit?
 - i. If yes, explain why the wire-down events were not considered Level 1 conditions.
 - ii. If not, provide:
 - 1. A discussion of why these events were not included in the audit.
 - 2. The number of priority A conditions identified from 2020-2023 that were not included in the audit.

Response to OEIS Data Request 15.3

- (a) No, wire-down events were not specifically addressed in the audit.
 - i. Not applicable.
 - ii. A wire-down “event” implicates a different concept than a “condition,” and these two issues are addressed in two different processes. The audit specifically reviewed the 581 priority A conditions recorded in PacifiCorp’s facility point inspection (FPI) system for the period of 2020-2023, which were identified as conditions, as part of PacifiCorp’s inspection and maintenance program, administered in conjunction with GO 95, Rule 18. Conditions are generally identified by an inspector conducting a scheduled inspection of a facility; and sometimes field personnel may happen to identify a condition if working in the area. In both cases, the condition is recorded in FPI, and that record will be used to schedule corrective work. A wire-down event, however, is not recorded in FPI as a condition. If there is a wire-down event, line personnel are promptly dispatched to make an immediate repair and restore

¹ PacifiCorp 2026-2028 Base WMP R1, Attachment G, PC-25U-07 PacifiCorp Imminent Threat Condition Review (Third-Party Audit), Published November 26, 2025, URL:(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=59782&shareable=true>).

electric service. Accordingly, the record of a wire-down event is captured in PacifiCorp's outage management system (because the wire-down event is virtually always associated with a reported outage), and the list of wire-down events referenced above was drawn from those separate outage records, which were not the subject of the audit.

OEIS Data Request 15.4

Regarding the Number of Non-Exempt Expulsion Fuses in PacifiCorp's HFRA and HFTD:

- (a) Provide an estimate of the number of installed non-exempt expulsion fuses in PacifiCorp's HFRA and HFTD that will require replacement over the lifetime of initiative GH-05, as of January 1, 2026.
- (b) Provide a description of how PacifiCorp calculated this estimate.

Response to OEIS Data Request 15.4

- (a) The estimate of the number of installed non-exempt expulsion fuses in PacifiCorp's high fire risk area (HFRA) and high fire threat districts (HFTD) that will require replacement over the lifetime of initiative GH-05 Expulsion Fuse Replacement, as of January 1, 2026, is 1,517.
- (b) PacifiCorp reviewed the circuits within the HFRA and HFTD where non-exempt expulsion fuses had not been scheduled for replacement prior to January 1, 2026. Eight circuits were identified. The locations with overhead transformers and line protective fuses on these circuits were counted to determine locations that are currently mapped with non-exempt fuses. The sum of these locations is the estimated number of remaining fuses. Additional fuses on these circuits outside the HFTD or HFRA may need to be replaced for coordination on the circuit.