PACIFIC POWER
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RE: CA 2025-WMPs
OEIS-P-WMP_2025-PC-17

Please find enclosed PacifiCorp's Responses to OEIS Data Requests 17.1-17.3 as well as Attachment OEIS 17.2.

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

Sincerely,

___/s/___
Pooja Kishore
Manager, Regulation

OEIS Data Request 17.1

Regarding Record Keeping Procedure for Key Risk Assessment Improvement Plans: On page 457 of its 2026-2028 Base WMP R1 - Clean, PacifiCorp states, "Currently PacifiCorp does not have an enterprise system to track its risk assessment initiatives".

Describe how PacifiCorp will track and monitor the Key Risk Assessment Areas listed in Table 5-6: Utility Risk Assessment Improvement Plan.

Response to OEIS Data Request 17.1

PacifiCorp tracks completion of risk modeling updates and the related initiatives in Table 5-6 using Azure DevOps following practices similar to those employed for software development.

OEIS Data Request 17.2

Regarding Incomplete Asset Records Found: On page 457 of its 2026-2028 Base WMP R1, PacifiCorp stated that, "When asset records are found to be incorrect or incomplete, or require updates, periodic cyclical inspections identify these deficiencies, prompting updates to the relevant databases".

(a) Describe the ways in which are "found" to be incorrect or incomplete.

(b) Describe PacifiCorp's "periodic cyclical inspections" which identify these deficiencies.

(c) Describe the way(s) "updates to the relevant databases" are conducted.

Response to OEIS Data Request 17.2

(a) PacifiCorp conducts periodic inspections of its lines and substation assets. The frequency of these inspections is outlined in PacifiCorp's Policy 001: Maintenance Intervals for Apparatus, Relays, Line Patrol/Inspections, and Communications Equipment. Please refer to Attachment OEIS 17.2 which provides a copy of the aforementioned policy.

Example – Line Inspection: During a line inspection, an issue indicating incomplete or inaccurate data might occur when an inspector finds a pole between a span of wire that is not listed in PacifiCorp's database. In such cases, the inspector must add the pole to the inspection application, so that both the pole and its associated attributes are updated in the appropriate databases. These updates ensure that the mainframe database and GIS reflect accurate information, keeping mapping correct.

Example – Substation Inspection: Similarly, incorrect or incomplete data in a substation scenario may arise when a journeyman discovers that a piece of equipment is missing or has incorrect specifications (e.g., make, model, serial number). In this instance, the journeyman records the issue in the inspection form and submits it to PacifiCorp's Asset Maintenance and Compliance team, which then updates Maximo with the correct information.

(b) Please refer to the Company's response to subpart (a) above.

(c) Please refer to the Company's response to subpart (a) above.

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OEIS Data Request 17.3

Regarding Grid Design, Operations, and Maintenance Expenditures: In its 2026-2028 Base WMP R0 data submission,[1] PacifiCorp submitted Grid Design, Operations, and Maintenance expenditures of $485.7 million that adds to the following breakdown:

- $469.1 million in the HFTD (97 percent) and
- $16.6 million in the Non-HFTD (3 percent).

In its Base WMP R1 submission,[2] provided in conjunction with PacifiCorp's Revision Notice response, Grid expenditures are $483.8 million that adds to the following breakdown:

- $295.8 million in the HFTD (61 percent) and
- $188 million in the Non-HFTD (39 percent).

In PacifiCorp's response to Data Request 11, Question 1.b, which inquired about PacifiCorp's WMP R0 data submission and asked why PacifiCorp was able to provide a projected expenditures for Grid Design, Operations, and Maintenance, PacifiCorp stated, "PacifiCorp provided a breakout of projected expenditure for initiative GH-01: Grid Hardening and System Design because the planned work is within the HFTD."[3]

In PacifiCorp's WMP R1 data submission, a few of its grid design, operations, and maintenance expenditures entries provide a comment stating that "Forecasted expenditures consistent with % Planned in HFTD per year in Table 8-1 of the 2026-2028 Base WMP."

(a) Explain the reason(s) why PacifiCorp's projected WMP expenditures for Grid in the HFTD decreased to $295.8 million (WMP R1) from $469.1 million (WMP R0).

(b) Explain the reason(s) why PacifiCorp's projected WMP expenditures for Grid in the Non-HFTD increased to $188 million (WMP R1) from $16.6 million (WMP R0).

(c) Explain why PacifiCorp's projected expenditures for Grid decreased from 97 percent in the HFTD to 61 percent.

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[1] PC_2026-WMP_R0, Published Jul. 23, 2025,
URL:(https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=59034&shareable=true)
[2] PC_2026-WMP_R1, Published Dec. 10, 2025,
URL:(https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=59860&shareable=true)
[3] PacifiCorp response to Data Request 11, Question 1.b, Published Oct. 3, 2025,
URL:(https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=59468&shareable=true)

Response to OEIS Data Request 17.3

(a) The percentage of planned activity for GH-01 as listed in Table 8-1 did not change between the R0 and R1 submissions. The R0 submission included both High Fire Threat District (HFTD) and High Fire Risk Area HFRA expenditures as HFTD. The R1 submission correctly allocates the HFRA expenditures as non-HFTD.

(b) Please refer to the Company's response to subpart (a) above.

(c) Please refer to the Company's response to subpart (a) above.