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RE: CA 2025-WMPs
OEIS-P-WMP_2025-PC-18

Please find enclosed PacifiCorp's Responses to OEIS Data Requests 18.1-18.3.

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

Sincerely,

___/s/___
Pooja Kishore
Manager, Regulation

OEIS Data Request 18.1

Regarding Controls and Validation Methods for Data Integrity: On page 535 of its 2026-2028 Base WMP R1 clean, PacifiCorp states, "… PacifiCorp utilizes industry best practices to maintain data integrity in preparation for systems implementations, including iterative practice data loads, iterative functionality testing and other industry standard practices to ensure quality results."[1] Describe the controls and validation methods used to maintain data integrity and confirm migration completeness and accuracy.

Response to OEIS Data Request 18.1

Please note that the project has not yet begun full data conversion, and the process described below is illustrative and subject to change as planning and execution progress. During project execution, conversion follows a structured Extract-Transform-Load (ETL) methodology, reinforced by multiple mock conversion cycles, comparison reports, business verification, and formal entry/exit criteria for program stages. Each mock cycle has different targets for data completeness, working towards full data loads prior to a joint dress rehearsal, and data is utilized during iterative system test cycles to help identify operational readiness in real-world scenarios. Data integrity steps include continuous data cleansing through mock cycles, utilizing secure data transfer methods, and access controls. The validation steps include:

- Pre-Load Validation: Confirm extract filter criteria and mapping accuracy before loading.
- Post-Load Validation: Validate transformed data in the target system.
- Exception Reporting: Identify discrepancies, gaps in conversion, and resolve defects iteratively.

Defects are tracked in Azure DevOps and reporting dashboards are used to track resolution.
Formal Entry/Exit criteria are used as checkpoints for each stage of the project and serve as data to support the project prior to moving forward.

[1] PacifiCorp 2026-2028 Base WMP R1 clean, Published November 26, 2025, URL:(https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=59778&shareable=true)

OEIS Data Request 18.2

Regarding Post-Implementation Process for Data Quality and Data Integrity:
On page 535 of its 2026-2028 Base WMP R1 clean, PacifiCorp states, "PacifiCorp uses a robust, standardized process after implementation to ensure data quality and integrity, including a support function to correct any potential issues that may arise."

(a) Describe the end-to-end "robust, standardized post-implementation process".

(b) Explain what "support function" means in this context and describe how the support function corrects potential issues.

Response to OEIS Data Request 18.2

(a) After data is loaded in the production system, it is verified by the business. Data maintained in the system uses role-based access controls and approved methods for data entry, integrations, or loading to help ensure continued integrity of data within the system.

(b) A hypercare support period and a standard operational support model are established with each implementation to track, manage, and correct issues identified after a deployment as well as to conduct any necessary system maintenance. These practices follow IT change control processes.

OEIS Data Request 18.3

Regarding Wildfire Cameras with AI Software: On page 364 of its 2026-2028 Base WMP R1 clean, PacifiCorp states, "The placement of wildfire cameras to enhance situational awareness, as well as implementation of fire modeling software solutions, particularly those that have AI/ machine learning capabilities" have potential benefits. On page 365, PacifiCorp states that it is "expected that all cameras will run artificial intelligence (AI) software 24/7."

(a) How many and what percent of total PacifiCorp wildfire cameras currently operate with AI software?

i. How many and what percent of total PacifiCorp wildfire cameras will operate with AI software by EOY 2026?

ii. How many and what percent of total PacifiCorp wildfire cameras will operate with AI software by EOY 2027?

iii. How many and what percent of total PacifiCorp wildfire cameras will operate with AI software by EOY 2028?

(b) When does PacifiCorp anticipate that "all cameras will run artificial intelligence (AI) software"?

Response to OEIS Data Request 18.3

(a) All five (5) cameras (100%) operate using artificial intelligence (AI) software.

i. All five (5) cameras (100%) will operate using AI software.
ii. All eight (8) cameras (100%) will operate using AI software.
iii. All eight (8) cameras (100%) will operate using AI software.

(b) All currently installed cameras operate using AI software, and all future camera installations are expected to operate using AI software throughout 2026–2028.