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RE: CA 2025-WMPs  
OEIS-P-WMP\_2025-PC-21

Please find enclosed PacifiCorp's Response to OEIS Data Request 21.1.

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

Sincerely,

           /s/             
Pooja Kishore  
Manager, Regulation

## OEIS Data Request 21.1

**Regarding Progress on Risk Model Development:** On pages 110-112 of its 2026-2028 Base WMP R1 Clean, in Table 5-6: Utility Risk Assessment Improvement Plan, PacifiCorp provided information about the planned development of its risk assessment.<sup>1</sup>

Provide a descriptive update on each “Key Risk Assessment Area” and “Proposed Improvement” with an EOY 2025 “Timeframe and Key Milestone.” Include whether the improvement was completed as of 12/31/2025. If it was not, provide the new timeframe.

## Response to OEIS Data Request 21.1

1. PC-25U-02: PSPS and Wildfire Risk Trade-Off Transparency – Public Safety Power Shutoff (PSPS) risk has been quantified and is now a part of the overall risk calculation. PSPS risk is composed of two main risk factors: Consequence of Risk Event (CoRE) and Likelihood of Risk Event (LoRE). PSPS risk is quantified in U.S. dollars and added to the risk profile of each circuit segment.
2. Monetization of risk events for use in Risk-Spend Efficiency (RSE) calculations – PacifiCorp has completed its conversion of unitless risk scores to monetized values. This data is utilized in a benefit cost ratio to help determine the cost efficiency of projects.
3. Creation of Protective Equipment and Device Settings (PEDS) Risk Model – PEDS risk has been quantified and is now a part of the overall risk calculation. PEDS risk is composed of two main risk factors: CoRE and LoRE. PEDS risk is quantified in U.S. dollars and added to the risk profile of each circuit segment.
4. Create reproducible model development environment using Python, Azure Dev Ops (ADO), and Azure Cloud resources – The reproducible model architecture has been implemented and leverages a flexible, modularized Python environment with version control via Azure Dev Ops. Azure Cloud is utilized for data storage and data connections that are ingested into the risk model. This architecture is still evolving. An update on this initiative’s progress will be provided in the next Wildfire Mitigation Plan update.
5. Implement a standardized model taxonomy to track release versions – A standardized model taxonomy has been implemented to track release versions of the risk planning model. The taxonomy tracks Major, Minor, and Configuration Specifications. Slight changes have been made to this initiative since the 2026-2028 Base WMP filing to reflect an evolving, extensible, and maintainable model architecture. The component previously described as a Patch in the PacifiCorp’s Base 2026-2028 WMP, is now called ModelSpec, which is described below.

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<sup>1</sup> PacifiCorp, [2026-2028 Base Wildfire Mitigation Plan R1](https://efiling.energy.ca.gov/eFiling/Getfile.aspx?fileid=59778&shareable=true), Published November 26, 2025, URL: (<https://efiling.energy.ca.gov/eFiling/Getfile.aspx?fileid=59778&shareable=true>).

ModelSpec: (Configuration Specification) tracks modifications to configurable model inputs that do not alter core logic. This tier enables rapid iteration and comparative analysis by allowing adjustments to data sources, constant values, algorithm parameters, and similar settings independent of underlying model architecture.

6. Dynamic Grid Hardening Efficacy Rates – PacifiCorp is still using subject matter expert defined efficacy rates and expects to complete the initiative to move to data driven and engineering-based mitigation efficacy scores by end of year 2026.