



February 3, 2026

Joshua Jones  
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## NOTICE OF NON-PERFORMANCE

Mr. Jones:

Pursuant to Government Code section 15472, et seq, the Office of Energy Infrastructure Safety (Energy Safety) has conducted an inspection of work completed by PacifiCorp (PC) in accordance with its 2025 Wildfire Mitigation Plan (WMP) and determined the existence of non-performance requiring correction. Energy Safety therefore issues PC a Notice of Non-Performance (NON), identifying non-performance with its approved WMP.

On October 8, 2025, Energy Safety conducted an inspection of PacifiCorp's WMP initiatives in the vicinity of the city of Klamath River, California. The inspection report is enclosed herewith. Energy Safety found the following deficiencies:

Deficiency 1. Energy Safety observed that in implementing 2025 WMP initiative Covered conductor installation, PC failed to install covered conductor on Pole ID 06246009.133401, Grid Hardening ID 7011447i at coordinates 41.83017052263573, -122.8464202100858. Energy Safety considers this non-performance to be in the Minor risk category. PC must complete a corrective action for this deficiency by 12 months from date of this notice.<sup>1</sup>

Within 30 days from the issuance date of this NON, the electrical corporation must provide a response advising Energy Safety of corrective actions taken or planned to remedy the identified deficiency or deficiencies.

This response shall be filed in the Energy Safety e-Filing system under the 2025 NON Docket,<sup>2</sup> and the associated file name(s) must begin with the NON identification number.

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<sup>1</sup> Gov. Code section 15475.2(a)(2)

<sup>2</sup> <https://efiling.energysafety.ca.gov/EFiling/DocketInformation.aspx?docketnumber=2025%20NON>

Prior to its response, the electrical corporation may request an informal conference with Energy Safety for the purpose of disputing any issues raised in this NON no later than 10 business days before the response deadline.<sup>3</sup> Requests for informal conference with Energy Safety must be e-mailed to [assetperformance@energysafety.ca.gov](mailto:assetperformance@energysafety.ca.gov), with a copy sent to all Energy Safety staff identified in the NON.

Sincerely,



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<sup>3</sup> Energy Safety Performance Guidelines, p. 4



# INSPECTION REPORT

## Overview

### Inspection Categories

The Office of Energy Infrastructure Safety (Energy Safety) conducts inspections to verify the work performed by an electrical corporation as reported in an approved Wildfire Mitigation Plan (WMP) or subsequent filing, and to assess general conditions of electrical infrastructure that may adversely affect an electrical corporation's wildfire risk.

A Notice of Non-Performance (NON) is issued for any deficiencies discovered during an inspection related to an electrical corporation's performance of its WMP.

### Correction Timelines

Deficiencies must be corrected in a timely manner. Energy Safety may prescribe a timeframe for resolution of a deficiency.<sup>4</sup> If Energy Safety assigns a risk category to a deficiency, an electrical corporation must correct the deficiency as required per the timelines provided in Table 1.<sup>5</sup>

**Table 1. Risk Category and Correction Timelines**

Risk Category	Deficiency correction timeline
Severe	<ul style="list-style-type: none"><li>• Immediate resolution</li></ul>
Moderate	<ul style="list-style-type: none"><li>• 2 months (in High Fire Threat District (HFTD) Tier 3)</li><li>• 6 months (in HFTD Tier 2)</li><li>• 6 months (if relevant to worker safety; not in HFTD Tiers 2 or 3)</li></ul>
Minor	<ul style="list-style-type: none"><li>• 12 months or resolution scheduled in WMP update</li></ul>

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<sup>4</sup> Gov. Code section 15475.2(a)(2)

<sup>5</sup> Energy Safety Performance Guidelines, p. 4



## Inspection Summary

Table 2 provides a summary of the selection of the WMP inspection location and initiative. Table 3 provides a summary of the deficiency or deficiencies found during the inspection. Details regarding the inspection that identified the deficiency or deficiencies are provided in the Inspections Details Section below.

***Table 2: Inspection Location and Initiative Summary***

Electrical Corporation:	PacifiCorp
Report Number:	PAD_PC_IAG_20251008_1100
Inspector:	Ivan Garcia
WMP Year Inspected:	2025
Quarterly Data Report (QDR) Referenced:	Quarter 2 (Q2)
Inspection Selection:	Energy Safety viewed the contents of the Q2 QDR and performed an analysis that resulted in the selection of the WMP initiatives and locations referenced in this report.
Relevant WMP Initiative(s):	8.1.2.1 – Covered conductor installation
Date of Inspection:	October 8, 2025
City and/or County of Inspection:	Klamath River, Siskiyou County
Inspection Purpose:	Assess the accuracy of PacifiCorp’s QDR data, completeness of its work, and performance of WMP requirements.

***Table 3: WMP Inspection Deficiencies***

Deficiency #	Structure ID	Grid Hardening ID	Lat/Long	HFTD	Initiative Number	Severity	Deficiency Description
Deficiency 1	0624600.9133401	7011447i	41.83017052263573, -122.8464202100858	Tier 2	8.1.2.1 – Covered conductor installation	Minor	Failure to complete work on covered conductor installation

# Inspection Details

## Deficiency 1

### **Relevant Requirement:**

PC's WMP states the following regarding initiative number 8.1.2.1 - Covered conductor installation:

1. "Reconductor with covered conductor: Specialized overhead covered conductors can be constructed with additional shielding and enhanced insulating properties to aid in wildfire mitigation."
2. "Covered conductor is less susceptible to incidental contact with foreign objects, such as branches or Mylar balloons. While covered conductor does not prevent incidental contact from occurring, it reduces the potential that incidental contact will result in a fault event, thereby reducing the wildfire risk."

### **Findings:**

On Pole ID 06246009133401, Grid Hardening ID 7011447i at 21722-21998 Klamath River Rd, Klamath River, CA, 96050, USA, 41.83017052263573, -122.8464202100858, the inspector observed that no covered conductor was installed along the span east of the subject pole. The inspector's observation is documented in Deficiency 1 photographs, which are attachments to this report. Photo numbers IA1Img1, IA1Img2, IA1Img3, and IA1Img4, depict no covered on the east side span along Klamath River Road to next pole with Pole ID 06246009.133400. In the 2025 Q1 Quarterly Data Report submission, PC reported that work on WMP initiative 8.1.2.1 – Covered conductor installation was completed at this location.

Energy Safety concludes that there is a deficiency because of these facts:


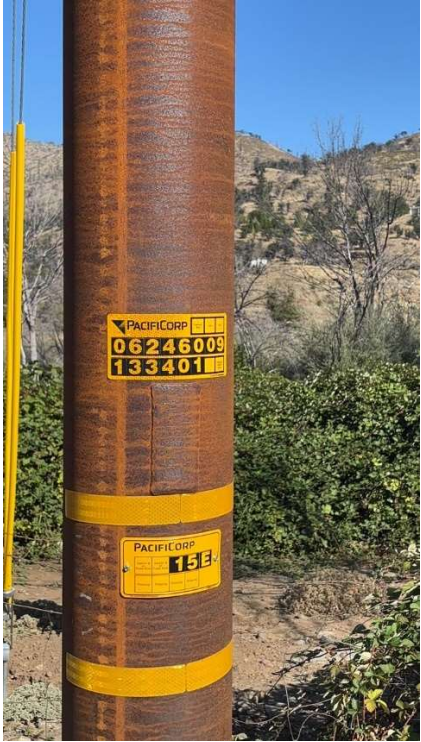
1. The inspector did not observe covered conductor installed at the Pole ID 06246009133401 along the east side span to the next Pole ID 06246009.0133400.
2. The inspector observed bare conductor at the Pole ID 06246009133401 along the east side span to the next Pole ID 06246009.0133400.

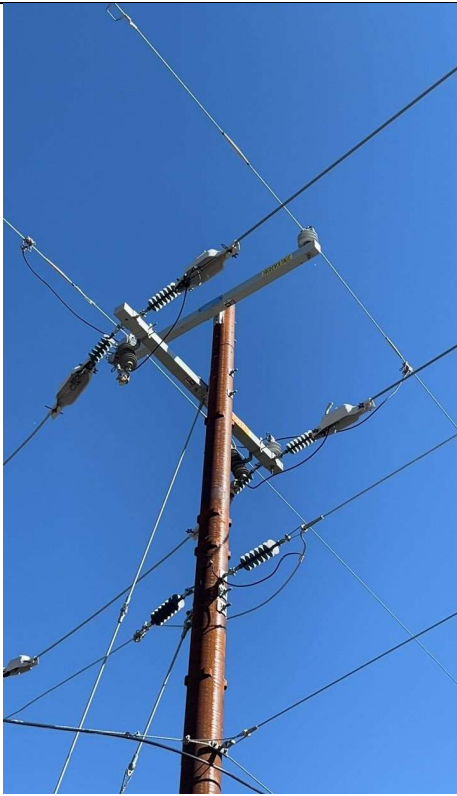
# Exhibits

## Exhibit A: Photo Log

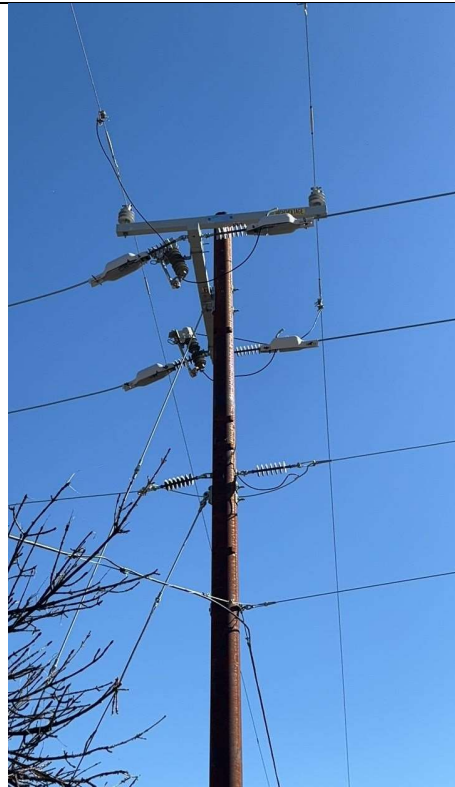
**Structure ID:** 0624600.9133401

Deficiency 1

 A photograph showing two wooden utility poles with cross-arms and wires. The poles are situated in a dry, hilly area with sparse vegetation under a clear blue sky. A paved road is visible in the foreground.	 A close-up photograph of a weathered wooden utility pole. Two yellow identification labels are attached to the pole. The top label reads 'PACIFICORP' and '0624600.9133401'. The bottom label reads 'PACIFICORP' and '15E'. The background shows dry vegetation and a clear blue sky.
<b>GImg1:</b> Overall Structure	<b>GImg2:</b> Structure ID



**IA1Img1:** No covered conductor installed on the east side span of the pole.



**IA1Img2:** No covered conductor on the east side span of the pole, bare conductor is observed.



**IA1Img3:** No covered conductor installed on the east side span along Klamath River Road to next pole with Pole ID 06246009.133400.





**IA1Img4:** The next pole, Pole ID 06246009.133400 with no covered conductor installed.



**IA1Img5:** Structure ID