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RE: CA 2025-WMPs
OEIS-P-WMP_2025-PC-13_

Please find enclosed PacifiCorp's 1st Revised Responses to OEIS Data Requests 13.4 and 13.9.

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

Sincerely,

 /s/
Pooja Kishore
Manager, Regulation

OEIS Data Request 13.4

Regarding PacifiCorp’s Wildfire and Emergency Response Team: On pages 444 of its 2026-2028 Base WMP R0, PacifiCorp states that a 2024 lesson learned is that its Emergency Preparedness external communications “relationships need to be bolstered to improve real time ability to coordinate” due to the 90 counties it serves in six states. Its proposed WMP improvement is to establish a Wildfire and Emergency Response Team.

- (a) Based on the experience PacifiCorp gained in 2025, how has the Wildfire and Emergency Response Team impacted its emergency management relationships in real time? Provide three examples.
- (b) If there are no examples, provide a full description of how PacifiCorp envisions the Wildfire and Emergency Response Team will function.

1st Revised Response to OEIS Data Request 13.4

Further to the Company’s response to OEIS Data Request 13.4 dated December 4, 2025, the Company provides the following revised response:

- (a) PacifiCorp’s Wildfire and Emergency Response team offers the following three examples to illustrate the team’s impact to real-time emergency management relationships:
 - (1) Real-time coordination: The Fire and Emergency Managers (FERM) act as liaisons during emergencies to ensure a timely and accurate exchange of information between emergency response agencies and PacifiCorp's emergency coordination center. The FERM worked directly with incident command on the Heather Fire in Siskiyou County, California to keep assets that provide power to irrigation pumps energized to support fire suppression.
 - (2) Incident command participation: FERMs work directly with incident command to make certain PacifiCorp's operational response supports incident command efforts. The FERM coordinated with incident management on the Blue Fire in Siskiyou County, California, and provided useful information on company assets.
 - (3) Preparedness and relationship building: FERMs support pre-season planning and after-action reviews to improve response capabilities. FERMs participated in pre-fire season agency coordination meetings with CalFire in Del Norte, Siskiyou, and Modoc counties to ensure strong working partnerships and collaboration throughout fire season.

PacifiCorp wildfire and emergency response will provide resource support to transmission and distribution operations during wildland fires and other incidents that

could impact PacifiCorp customers. Response managers will work with PacifiCorp's Wildfire Intelligence Center (WIC) to validate threats, issues and concerns and provide updates to internal stakeholders as appropriate; and will dispatch to impacted areas during public safety power shutoff (PSPS) events to support Company activities during such event.

(b) Not applicable.

OEIS Data Request 13.9

Regarding Lessons Learned WMP Guidelines Requirements: On page 181 of the WMP Guidelines it states that the lessons learned narrative, “must also include lessons learned from prior catastrophic wildfires ignited by the electrical corporation’s facilities or equipment and findings from Energy Safety compliance audits and reports.”¹

- (a) Describe PacifiCorp’s lessons learned from prior catastrophic wildfires ignited by the electrical corporation’s facilities or equipment. Also include all information required in Table 13-1.
- (b) Describe PacifiCorp’s lessons learned from Energy Safety compliance audits and reports. Also include all information required in Table 13-1.

1st Revised Response to OEIS Data Request 13.9

Further to the Company’s response to OEIS Data Request 13.9 dated December 4, 2025, the Company provides the following revised response:

- (a) PacifiCorp objects that the request seeks information protected by the attorney-client privilege and attorney work product doctrine. Subject to and without waiving these objections, PacifiCorp responds as follows:

Certain claimants, including in pending litigation, have asserted that the Slater Fire and McKinney Fire were ignited by PacifiCorp facilities, which PacifiCorp disputes. PacifiCorp is not aware of any other catastrophic wildfire ignited by, or allegedly ignited by, PacifiCorp facilities in California. PacifiCorp may update its lessons learned with respect to a fire after all litigation and all claims related to such fire are resolved.

- (b) PacifiCorp provides the following lessons learned from the 2023 Substantial Vegetation Management (SVM) Audit that was received February 21, 2025. The ID number begins with #8 to continue the numbering in Table 13-1 of the 2026-2028 Base Wildfire Mitigation Plan (WMP).

ID	Year of Lesson Learned	Subject	Category and Source of Lesson Learned	Description of Lesson Learned	Proposed WMP Improvement	Timeline for Implementation	Reference
8	2023	8.2.3.1 Vegetation Management	2023 SVM Audit	PacifiCorp demonstrated that it cleared 3,100 poles in LRA HFTD areas. Thus, PacifiCorp	Revise pole clearing tracking process to more	2024	9.4.4

¹ Office of Energy Infrastructure Safety, [Wildfire Mitigation Plan Guidelines](https://efiling.energy.ca.gov/eFiling/Getfile.aspx?fileid=58026), Published February 24, 2025, URL:(<https://efiling.energy.ca.gov/eFiling/Getfile.aspx?fileid=58026> &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.

2025 WMPs/ PacifiCorp
 December 12, 2025
 OEIS-P-WMP_2025-PC-13 – 1st Revised

ID	Year of Lesson Learned	Subject	Category and Source of Lesson Learned	Description of Lesson Learned	Proposed WMP Improvement	Timeline for Implementation	Reference
		– Pole Clearing		<p>fell short of its Fuels Management - Pole Clearing beyond PRC 4292 (VM-05) target by 26 poles.</p> <p>PacifiCorp did not provide information consistent with the completion of work identified in 8.2.3.1 Pole Clearing. PacifiCorp must provide a corrective action plan (CAP) addressing the deficiency identified relative to its pole clearing target.</p>	accurately capture poles that are inspected and not worked or are exempt.		
9	2023	8.2.3.5 Vegetation Management – Substation Defensible Space	2023 SVM Audit	<p>Because vegetation management inspections and corrective actions were not sufficiently documented, the information PacifiCorp provided did not demonstrate that all work commitments in this statement were completed. Defensible space acts to both protect the substation from wildfire and limit the potential spread of a fire that ignites within the substation into adjacent wildlands. Therefore, completion of vegetation management work to provide this space is necessary to minimize wildfire risk.</p> <p>In its CAP response, PacifiCorp must either provide documentation showing that vegetation management work was completed as a part of its substation inspections or provide information on how it plans to track this work in future years.</p>	PacifiCorp is receiving project reports from the weed abatement vendor which reports the completed work, including the specific substations where the abatement was performed at.	2023	Section 9.6

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10	2023	8.2.3.2 Vegetation Management – Wood and Slash Management	2023 SVM Audit	While the documents provided by PacifiCorp indicate that some work on slash removal was completed, Energy Safety cannot confirm wood and slash were removed in all or most instances. Failure to manage slash debris following tree trimming and removal activities is an ignition risk and would contribute to unnecessary risk on the system. Therefore, documentation of where slash work was completed and the vegetation management activities associated with the removals is necessary for PacifiCorp to demonstrate that it met the objective of the WMP. PacifiCorp must submit documentation identifying the locations and dates where slash was removed or lopped and scattered except when beyond PacifiCorp’s control. Without this documentation, PacifiCorp has not demonstrated that the work was completed.	Initiative VM-12: Wood and Slash Management/Debris Disposal: benchmark debris management data collection with other California utilities to learn how other utilities conduct and track debris management.	September 2028	Section 9.5.4
11	2023	8.2.3.3 Vegetation Management-Clearance	2023 SVM Audit	While PacifiCorp was able to demonstrate that it completed clearance work on transmission and distribution lines in the reports provided, it could not demonstrate that it implemented the expanded clearances for fast growing species. Because fast-growing species require increased clearances to minimize risk of encroachment on	Initiative ES-07: Vegetation Management and Inspections: Develop work prioritization to incorporate within MDMS	March 2026	Section 9.2.1.6

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ID	Year of Lesson Learned	Subject	Category and Source of Lesson Learned	Description of Lesson Learned	Proposed WMP Improvement	Timeline for Implementation	Reference
				<p>electrical lines and facilities, PacifiCorp must demonstrate it classified vegetation by growth rate and implemented appropriate clearances based on those classifications. The information PacifiCorp submitted did not demonstrate that the work described in this statement was completed. In its CAP response, PacifiCorp should provide documentation showing that increased clearances were achieved based on the growth rate, or the steps it will take to record this information in future years to minimize the risk of encroachment of fast-growing species on its electrical infrastructure.</p>			
12	2023	8.2.3.6 Vegetation Management – High-Risk Species	2023 SVM Audit	<p>While PacifiCorp was able to demonstrate that it completed clearance work (pruning and removals) on distribution lines, it was unable to provide information related to clearance distance, HFTD tier, or whether additional pruning for at-risk species with very fast growth rates was completed because file provided did not capture data on which species were considered “at-risk.” PacifiCorp explained that pruning activities associated with at-risk species were not specifically tracked but rather embedded in other work activities. The objective of this</p>	<p>Initiative ES-07: Vegetation Management and Inspections: Develop work prioritization to incorporate within MDMS</p>	March 2026	Section 9.2.1.6

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				initiative is to reduce wildfire risk from high-risk species and PacifiCorp was unable to provide documentation that it performed additional clearance work in the HFTD for these species.			

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