

February 17, 2026

***VIA OEIS E-FILING***

Docket # WMP-Guidelines

Tony Marino  
Deputy Director  
Office of Energy Infrastructure Safety  
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**RE: PacifiCorp Comments on Wildfire Mitigation Plan Submission Schedules Pursuant to Senate Bill 254 Requirements**

Dear Deputy Director Marino,

PacifiCorp d/b/a Pacific Power (“PacifiCorp”) hereby provides the following comments addressing issues and questions related to the Office of Energy Infrastructure Safety’s (“Energy Safety”) January 26, 2026, letter regarding the proposed Wildfire Mitigation Plan (“WMP”) Submission Schedules developed to comply with Senate Bill (“SB”) 254.<sup>1</sup> PacifiCorp supports the overarching goal of improved coordination between WMP and general rate case (“GRC”) cycles.

PacifiCorp recognizes that greater alignment between WMP and GRC cycles can strengthen regulatory efficiency. However, Small and Multi-Jurisdictional Utilities (“SMJUs”), including PacifiCorp, have unique statutory, operational, and regulatory structures that are materially different than those of the state’s larger investor-owned utilities (“IOUs”). These differences require additional clarity, flexibility, and proportionality in the implementation of the proposed Schedules.

As an SMJU subject to WMP requirements under Public Utilities Code § 8386 and SB 254, PacifiCorp offers the following comments for Energy Safety’s consideration.

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<sup>1</sup> See California Office of Energy Infrastructure Safety, Re: Wildfire Mitigation Plan Submission Schedules (Jan. 26, 2026), available at: <https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=60109&shareable=true>.

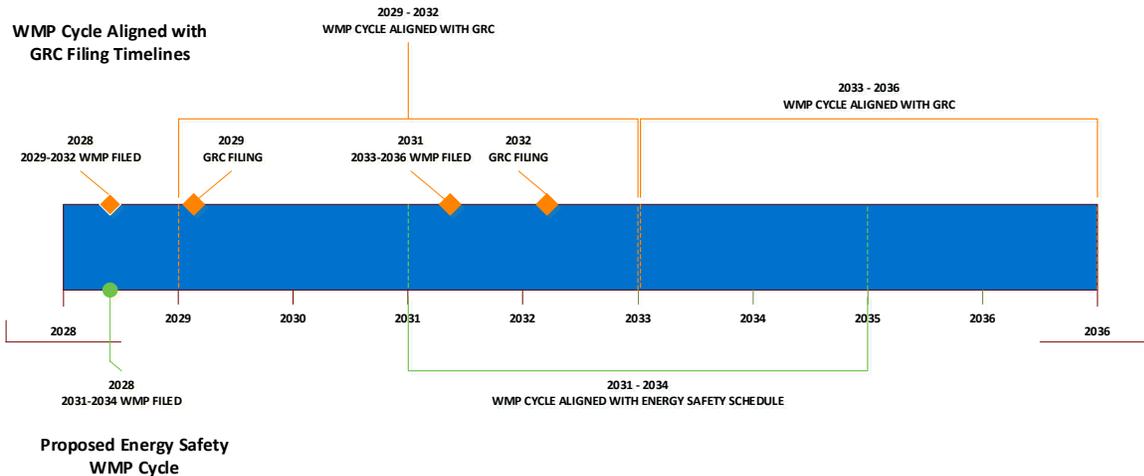
**I. Comments**

**A. Clarification Requested on SMJU Treatment and GRC Cycle Assumptions**

PacifiCorp reiterates that SMJUs operate under different GRC cadences than the state’s large IOUs.<sup>2</sup> PacifiCorp and Liberty Utilities follow a three-year GRC cycle, while Bear Valley Electric Service follows a four-year cycle. Imposing a uniform four-year WMP cadence upon SMJUs will create a misalignment between when a WMP must be filed and when the corresponding GRC is submitted. For PacifiCorp, this misalignment would compound with each successive cycle, resulting in a progressively longer lag between the WMP filing date and the years the plan is intended to cover.<sup>3</sup>

Energy Safety is asking that PacifiCorp submit a 2028–2031 WMP in 2027, followed by a 2031-2034 WMP in 2029. There is potential misalignment between Energy Safety’s WMP cycle dates proposed by the Schedules and PacifiCorp’s GRC timeline. Under the proposed schedule, PacifiCorp would file a WMP in 2028 covering 2031-2034 to support its 2029 GRC with a 2030 test year. PacifiCorp, however, interprets the SB 254 requirements to mean that the applicable WMP cycle should be 2029-2032.

The figure below illustrates the potential misalignment, showing PacifiCorp’s expected WMP-GRC alignment on the top and the proposed WMP cycle on the bottom, beginning with the 2028 filing year. PacifiCorp requests clarification regarding the WMP cycle it is expected to submit in 2028 and how it should address the growing lag between GRC and WMP cycles.



<sup>2</sup> See Bear Valley Electric Service, Inc., Liberty Utilities (CalPeco Electric) LLC, and PacifiCorp, *Re: Comments on the Public Workshop on Implementation of Cost-per-Avoided Ignition and Wildfire Mitigation Plan Schedule Pursuant to Senate Bill 254 Requirements* (Jan. 19, 2026).

<sup>3</sup> For example, PacifiCorp’s first GRC subject to SB 254 will be filed in 2029, which would require a WMP filed in 2028 for the 2029–2032 period. Its next GRC filing in 2032 would necessitate a WMP filing in 2031 for the 2033–2036 period, creating a longer forecasting horizon and a growing operational lag. See also *id.* at 5.

## **B. Treatment of Overlapping Years**

PacifiCorp requests additional clarification regarding the years in which WMPs must take effect and how overlapping years will be treated. Because PacifiCorp is on a three-year GRC cycle, the proposed schedule results in overlap years—specifically 2028 and 2031—that would fall within two WMP cycles. PacifiCorp requests guidance on whether performance targets for those overlapping years may be revised in the subsequent Base WMP, and, if so, under what circumstances such revisions would be permissible.

PacifiCorp further requests clarity regarding how Energy Safety will evaluate performance and compliance for overlapping years. Specifically, PacifiCorp seeks to understand whether the agency will rely on the earlier plan’s targets, the later plan’s targets, or a defined supersession rule that clarifies which plan prevails for performance evaluation. PacifiCorp asks Energy Safety to develop a clear and consistent framework governing how utilities should set, modify, and report metrics and performance for overlapping years that fall under two WMP cycles.

## **C. Suspension of 2027 WMP Update and 2026 Maturity Survey: Transition Guidance**

PacifiCorp seeks clarification on how Energy Safety intends to issue IOU WMP Guidelines under a staggered filing system. If IOUs file WMPs on different schedules, Energy Safety should clarify whether guidance will continue to be issued uniformly to all SMJUs or be issued on a utility-specific schedule aligned with each entity’s GRC cycle. PacifiCorp believes it is important that all IOUs operate under a single set of uniform Guidelines for each four-year cycle, even if filing dates differ. Consistent guidelines provide regulatory certainty, avoid inconsistent expectations, and ensure that utilities have sufficient time to incorporate new analytical or reporting requirements. PacifiCorp therefore requests that Energy Safety issue revised Guidelines as early as practicable and maintain uniform, stable requirements within each four-year cycle.

PacifiCorp supports Energy Safety’s decision not to require a 2027 WMP Update or a 2026 Maturity Survey. However, PacifiCorp requests transitional guidance regarding how Areas for Continued Improvement (“ACIs”) originally tied to the 2027 WMP Update should be treated and how proposed 2027 updates proposed in the Second Draft Wildfire Mitigation Plan Update Requirements<sup>4</sup> should be communicated to Energy Safety. PacifiCorp recommends that Energy Safety clearly delineate how to address these critical issues, which would typically be addressed in the 2027 WMP Update. Clear guidance will ensure consistent interpretation and avoid compliance disputes across utilities.

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<sup>4</sup> Office of Energy Infrastructure Safety.  
TN16925\_20251104T090931\_Second\_Draft\_Update\_Requirements\_Chapter (Nov. 4, 2025).

#### **D. Workshops and Technical Assistance**

PacifiCorp strongly recommends that Energy Safety host SMJU-focused workshops after issuing revised WMP Guidelines. These workshops should address treatment of overlapping years, alignment of WMP and GRC schedules, implementation of SB 254 analytical requirements, ACI expectations, and coordination between Energy Safety and the Commission approval processes. Given the scope and complexity of the proposed changes, early and structured engagement will be essential to achieving consistent and effective implementation across SMJUs.

#### **II. Conclusion**

PacifiCorp appreciates Energy Safety's leadership and the opportunity to comment on the proposed WMP schedules. PacifiCorp respectfully requests that Energy Safety consider the issues raised above and in previous SMJU comments, and provide additional guidance to ensure proportionality, clarity, and regulatory alignment for SMJUs. PacifiCorp looks forward to continued collaboration with Energy Safety, the Commission, and stakeholders as the state transitions to the next phase of wildfire mitigation planning.

If you have any questions or require additional information, please contact Pooja Kishore at [pooja.kishore@pacificorp.com](mailto:pooja.kishore@pacificorp.com) or 503-813-7314.

Respectfully Submitted,



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