

February 25, 2026

Caroline Thomas Jacobs  
Director  
Office of Energy Infrastructure Safety  
715 P Street, 15th Floor  
Sacramento, CA 95814

Re: Revised PacifiCorp Q4 2020 Quarterly Initiative Update

Ms. Jacobs:

PacifiCorp is aware of certain errors in its Wildfire Mitigation Plan Quarterly Initiative Update for the fourth quarter of 2020 (the “Q4 2020 QIU”), submitted to the Wildfire Safety Division of the California Public Utilities Commission on April 1, 2021. For certain initiatives, the target units and/or the target figure reported in the Q4 2020 QIU did not match the targets in PacifiCorp’s 2020 Wildfire Mitigation Plan (“WMP”).

PacifiCorp hereby submits a revised Q4 2020 QIU, attached as Exhibit A, that corrects these and other errors. Additionally, a redline comparing the revised submission to the originally submitted Q4 2020 QIU is attached as Exhibit B. The specific corrections are further described in the table attached as Exhibit C.

In the interest of transparency, this cover letter explains some of PacifiCorp’s decisions in revising the QIU.

I. Asset Inspection Initiatives

A. Methodology for Conversion from Facilities to Line Miles

PacifiCorp’s 2020 WMP stated the targets for certain asset inspection initiatives (Initiatives 5.3.4.1, 5.3.4.2, 5.3.4.6, 5.3.4.11, and 5.3.4.12), in terms of line miles, but PacifiCorp tracks these inspections internally in terms of facilities or structures (not line miles).

To convert facilities or structures to line miles, PacifiCorp began by re-pulling data from its Facility Point Inspection (FPI) system for the number of facilities inspected in 2020. As reflected in the chart below, there was some variation between the data re-pulled from FPI and the number of facilities or structures reported in the Q4 2020 QIU. The number of inspections for Transmission Detailed Inspections (Initiative 5.3.4.2) and Transmission Patrol Inspections (Initiative 5.3.4.12) is higher than what was originally reported in the Q4 2020 QIU because of an apparent error in the original reporting.

<b>Initiative</b>	<b>No. of Facilities Inspected per Q4 2020 QIU</b>	<b>No. of Facilities Inspected per FPI Data</b>	<b>Notes</b>
Distribution Detailed Inspections (Initiative 5.3.4.1)	10,155	10,011	The detailed inspection numbers in this chart reflect only standalone detailed inspections, not detailed inspections completed as part of intrusive pole inspections. <i>See infra</i> , pp. 3–4.
Transmission Detailed Inspections (Initiative 5.3.4.2)	1,188	2,847	The detailed inspection numbers in this chart reflect only standalone detailed inspections, not detailed inspections completed as part of intrusive pole inspections. <i>See infra</i> , pp. 3–4.
Intrusive Pole Inspections (Initiative 5.3.4.6)	3,208	3,668	For the reasons explained below, the numbers in this chart include some poles that were scheduled for an intrusive pole inspection, but that were marked as having received a detailed inspection. <i>See infra</i> , p. 3.
Distribution Patrol Inspections (Initiative 5.3.4.11)	46,281	53,998	
Transmission Patrol Inspections (Initiative 5.3.4.12)	1,654	14,983	

After re-pulling the data, PacifiCorp converted facilities or structures to line miles using GIS data of its system from Q4 2020. Specifically, PacifiCorp aligned GPS data from its inspections with its GIS data for the associated structures or facilities and thereby identified the individual line spans where a structure or facility was inspected. Using its GIS span length data, PacifiCorp then calculated total line miles inspected by adding together the lengths of all relevant spans. In doing so, PacifiCorp counted the upstream and downstream span for each facility.

**B. Intrusive Pole Inspections (Initiative 5.3.4.6)**

PacifiCorp’s General Order 165 targets for intrusive pole inspections include all poles on a given transmission line or all poles within a one-mile distribution grid, even though some poles may not be subject to an intrusive inspection (because, e.g., the pole is a steel pole). When PacifiCorp implements its plan for intrusive pole inspections, other poles may not receive treatment (e.g., because the pole is on school property or because a customer refuses).

If a pole is not subject to an intrusive inspection, an inspector may log the inspection as a “detailed” inspection rather than an intrusive pole inspection. For purposes of reporting, PacifiCorp counted poles that were scheduled for an intrusive pole inspection, but which the inspector marked as having received a detailed inspection, towards the actuals for intrusive pole inspections. The following chart shows the breakdown of the inspection types reported for poles scheduled to receive an intrusive inspection in 2020:

	<b>Scheduled for Intrusive Pole Inspection, Marked as Detailed Inspection</b>	<b>Scheduled for Intrusive Pole Inspection, Marked as Intrusive Pole Inspection</b>	<b>Totals</b>
Distribution	23	3,205	3,228
Transmission	76	364	440

This approach is consistent with the process by which PacifiCorp develops targets for these inspections: Because the targets include poles that are not subject to intrusive pole inspections (e.g., steel poles), the actuals include those poles as well. PacifiCorp used the same approach in reporting on its intrusive pole inspections from 2021 to 2025. PacifiCorp can provide a breakdown of the inspection types reported for poles scheduled to receive an intrusive inspection for 2021 to 2025 upon request.

**C. Detailed Inspection Initiatives (5.3.4.1 and 5.3.4.2)**

The line-mile figures for detailed asset management inspections (Initiatives 5.3.4.1 and 5.3.4.2) in the revised QIU reflect the line miles associated with standalone detailed inspections and the line miles associated with detailed inspections that occur in conjunction with intrusive pole inspections. Under PacifiCorp policy, every pole that receives an intrusive inspection also receives a detailed inspection. When a contractor reports on these inspections, the contractor typically reports them as intrusive pole inspections (unless the intrusive pole inspection did not occur, as noted above, in which case the contractor would report a detailed inspection). To account for the detailed inspections that occur with every intrusive pole inspection, PacifiCorp added the line miles for standalone detailed inspections together with the line miles for intrusive pole inspections. Specifically, for initiative 5.3.4.2 (Transmission Detailed Inspections), PacifiCorp added the line miles for detailed inspections of transmission lines together with the line miles for intrusive pole inspections of transmission poles, and for initiative 5.3.4.1 (Distribution Detailed Inspections),

PacifiCorp added the line miles for detailed inspections of distribution lines together with the line miles for intrusive pole inspections of distribution poles.<sup>1</sup>

#### D. Discrepancies Between the Revised QIU and 2020 QDR

PacifiCorp notes that there are some discrepancies between the final line-mile figures reported in the revised QIU and the line miles that PacifiCorp reported in the 2020 Quarterly Data Report. Despite investigation, the Company is not currently able to explain how it converted facilities to line miles for purposes of the 2020 QDR that was submitted in March 2021.

<b>Initiative</b>	<b>Line Miles Reported in 2020 QDR</b>	<b>Line Miles Reported in Revised QIU</b>
Distribution Detailed Inspections (Initiative 5.3.4.1)	605	538
Transmission Detailed Inspections (Initiative 5.3.4.2)	226	224
Distribution Patrol Inspections (Initiative 5.3.4.11)	1,945	1,724
Transmission Patrol Inspections (Initiative 5.3.4.12)	767	704

## II. Vegetation Management Inspection Initiatives

In the 2020 WMP, PacifiCorp's detailed vegetation inspection initiatives (Initiatives 5.3.5.2 and 5.3.5.3) included a description of the Company's detailed *and* patrol vegetation inspection programs. The 2020 WMP did not include a separate target for patrol vegetation inspection initiatives. In the revised QIU, PacifiCorp's reporting on its detailed inspections therefore groups these inspections together. In other words, the revised QIU's reporting on the detailed vegetation inspection initiative for distribution lines represents the sum of detailed and patrol vegetation inspections on distribution lines completed in 2020, and the reporting on the

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<sup>1</sup> As noted, 99 poles scheduled for intrusive pole inspections were marked as having received a detailed inspection. PacifiCorp counted those 99 poles towards the actuals for intrusive pole inspections; it did not additionally count those 99 poles towards the actuals for standalone detailed inspections. In other words, PacifiCorp did not double count the 99 poles in the totals for initiatives 5.3.4.1 and 5.3.4.2.

detailed vegetation inspection initiative for transmission lines represents the sum of detailed and patrol vegetation inspections on transmission lines completed in 2020.

III. Fire Risk Monitoring (Initiative 5.3.2.5) and Data Governance (Initiative 5.3.7.1)

PacifiCorp updated the targets for these initiatives to reflect the qualitative targets from the 2020 WMP, rather than the financial figures that were included in the original Q4 2020 QIU. The employees most involved in these programs have since left the Company, so it cannot provide a qualitative update on work related to these initiatives in 2020.

IV. Other Aspects of the QIU

The Company's focus in revising the QIU has been to correct factual errors in its original submission, particularly targets that were misstated as between the QIU and the Company's 2020 WMP. Hence, the Company did not update the "status" or "corrective actions" columns in the revised QIU. The Company also did not add initiatives that were not addressed in its original QIU.

Please let us know should you have any questions or concerns regarding this submission.

Respectfully submitted,

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cc: Shafi Mohammed, OEIS, Chief Data Officer