

March 18, 2026

***VIA OEIS E-FILING***

Docket # 2026-2028-Base-WMPs

Tony Marino  
Deputy Director, Electrical Infrastructure Directorate  
Office of Energy Infrastructure Safety  
715 P Street, 20th Floor  
Sacramento, CA 95814

**RE: Opening Comments on Office of Energy Infrastructure Safety’s Draft Decision on PacifiCorp’s 2026–2028 Base Wildfire Mitigation Plan**

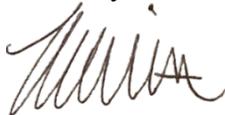
Dear Deputy Director Marino:

PacifiCorp d/b/a Pacific Power (PacifiCorp or company) appreciates the Office of Energy Infrastructure Safety’s (Energy Safety) thorough review of PacifiCorp’s 2026-2028 Base Wildfire Mitigation Plan (WMP).<sup>1</sup> The company provides the following opening comments on the Energy Safety Draft Decision (Draft Decision), dated February 26, 2026, approving PacifiCorp’s 2026-2028 WMP.

PacifiCorp values the collaborative process in the development and review of the company’s 2026-2028 Base WMP and looks forward to working with Energy Safety and interested stakeholders to reduce wildfire risk and enhance community resilience across California.

If you have any questions regarding these opening comments, please contact Pooja Kishore, Regulatory Affairs Manager at (503) 813-7314.

Sincerely,



Robert Meredith  
Director, Regulation

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<sup>1</sup> All references to PacifiCorp’s [2026-2028 Wildfire Mitigation Plan](#) (WMP) refer to R1, submitted November 26, 2025.

## I. ITEMS FOR CLARIFICATION

### a) 8.2.1.5 Microgrids

PacifiCorp would like to clarify Energy Safety’s assessment of the company’s work related to microgrids. On page 40 of the Draft Decision, Energy Safety states:

*PacifiCorp will perform feasibility studies for three microgrid projects during the 2026-2028 Base WMP cycle. Each microgrid site is within the HFTD or its HFRA. These feasibility studies should allow PacifiCorp to assess if future microgrid projects are an effective method of reducing wildfire risk. Analyzing the results of those studies is essential to evaluating if PacifiCorp should continue pursuing microgrid sites. With these actions PacifiCorp exhibits maturity.*

*PacifiCorp must provide the results of its three microgrid studies, and if it plans on proceeding with installing the microgrids. PacifiCorp must also provide its timeline for doing so in its next Base WMP.*

PacifiCorp clarifies that the Draft Decision mischaracterizes the company’s intentions regarding microgrid feasibility studies. PacifiCorp has already completed microgrid studies, as documented in the company’s response to Energy Safety Data Request 6 provided on August 6, 2025.

PacifiCorp did not state and does not intend to provide plans to perform feasibility studies for three microgrid projects during the 2026-2028 Base WMP cycle. Energy Safety’s reference to PacifiCorp’s response to Data Request 6, Question 1, as a source of such plans is inaccurate, as the data request refers to historical work and not future proposed or planned work.

### b) 11.1.2 External Collaboration and Coordination

PacifiCorp would like to provide clarification regarding Energy Safety’s assessment of the company’s work related to external collaboration and coordination. On page 88 of the Draft Decision, Energy Safety states:

*The key gap in its communication coordination with public safety partners (“Feedback on PSPS Playbook”) is not reflected as a 2026-2028 Base WMP target in Table 11-1. Energy Safety encourages PacifiCorp to develop a communications plan and set targets to strengthen the opportunity to receive the feedback it needs on its PSPS playbook.*

While PacifiCorp does not address its communication plan and targets in Table 11-1, the company does provide this information in Table 11-2, with the following:

- Gap or Limitation Subject: Limited feedback from partners on PSPS playbook during workshop review
- Remedial Action Plan: Continue outreach, training and exercise with partners to ensure alignment of plans, roles and expectations during system events
- Target Timeline: Annually by June 30

In addition to the actions identified in Table 11-2, the company describes its ongoing commitment to public safety partner engagement on page 418 of the 2026-2028 WMP. Specifically, the company explains:

*PacifiCorp facilitates annual discussion-based and functional tabletop exercises to develop awareness of PSPS planning and procedures. These exercises aim to facilitate public and private sector coordination, validate communications protocols, and verify capability to support communities during extreme risk events through mitigation actions such as the deployment of community resource centers. Additionally, the exercises include the collective identification of critical infrastructure at the county level to better inform restoration planning and notifications. The Company collects after-action reports from exercises and real-world events involving wildfire safety and PSPS. The after-action reports request feedback on areas for improvement, potential corrective actions and suggestions for plan or procedure development. PacifiCorp considers suggestions for inclusion in a comprehensive plan that is subsequently shared with the appropriate public safety partners.<sup>1</sup>*

Additionally, PacifiCorp would like to clarify that the company’s Public Safety Partner Portal referenced in the Draft Decision is referred to as the PSP Portal, not PSPS Portal, as cited by Energy Safety.

**c) 11.1.3 Public Communication, Outreach, and Education Awareness**

On page 89 of the Draft Decision, Energy Safety states:

*It is essential that PacifiCorp tests its ability to quickly and efficiently reach all AFN customers.*

PacifiCorp would like to clarify that the company already conducts annual internal and external exercises designed to test and strengthen elements of the PSPS Playbook, including notifications to AFN customers.

- Internal PSPS exercises include participation by the Joint Information Team, which plays a key role in conducting customer notifications, as well as the coordination of possible welfare checks for AFN customers who cannot be reached through standard notification channels.
- External PSPS exercises include public safety partners, community-based organizations, and other service providers who may support welfare checks for uncontacted AFN customers.

**d) 12.1.3 Vegetation Management**

On page 94 of the Draft Decision, Energy Safety states:

*In its 2026-2028 Base WMP, PacifiCorp has included a target to establish QA/QC processes and procedures for reviewing data entered into its PVM database.*

PacifiCorp would like to clarify that initiative ES-06, as presented in Table 12-1 of the company’s 2026-2028 WMP, refers specifically to the development of QA/QC processes related

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<sup>1</sup> PacifiCorp 2026-2028 Wildfire Mitigation Base Plan R1, November 26, 2025, page 418.

to PacifiCorp’s updated Mobile Data Management System (MDMS) software, not the Vegetation Management (PVM) database.

## **II. AREAS FOR CONTINUED IMPROVEMENT (ACI)**

### **a) PC-26B-02. Further Evaluation of Climate Change Impact on Extreme Scenarios**

PacifiCorp looks forward to collaborating with peer utilities to develop a joint report evaluating climate change impacts and participating in future discussions on how the findings of this collaborative effort should be interpreted and implemented.

PacifiCorp also notes that the company is currently partnered with the Argonne National Laboratory (ANL) Center for Climate Resilience and Decision Science to conduct a study assessing the impacts of climate change on both seasonal and extreme fire weather patterns. This study examines a 50-year period, comparing the historical period (1995-2004) with a mid-century future period (2045-2054). The results of this ANL study, expected in summer of 2026, could be used to inform the joint working group report.

PacifiCorp requests clarification from Energy Safety on the definition of “fifty-year period” for the purpose of this ACI and seeks confirmation that the 50-year period as incorporated into the ongoing study satisfies this portion of the requirement outlined in ACI PC-26B-02.

### **b) PC-26B-06. Circuit Selection for WMP Targets**

ACI PC-26B-06 requires PacifiCorp to provide an updated Table 6-4 and Table PAC 6-1 that identifies the specific circuits targeted for mitigation activities during the 2026-2028 WMP cycle. PacifiCorp is currently in the process of transitioning to a monetized assessment of utility risk and expects to include this new approach in its next WMP filing.

Given the planned transition, PacifiCorp requests that the terminology in ACI PC-26B-06 be updated to reflect this anticipated change by replacing the current reference to “Maximum Fuel/Terrain Wildfire Risk Scores” with “Monetized Expected Risk.” This revision would ensure alignment between the ACI requirement and the company’s evolving risk-assessment methodology.

### **c) PC-26B-09. Distribution and Transmission Pole Wrap Activity**

ACI PC-26B-09 requires PacifiCorp to provide locations where pole wraps were installed in 2025; discuss the evaluation criteria used to determine ideal installation locations; complete and summarize its evaluation of pole wrap effectiveness; and provide targets for pole wraps in its next WMP.

PacifiCorp clarifies that no pole wraps were installed in 2025, and the company has no plans for proactive or targeted installations in the coming years. Instead, PacifiCorp will continue to rely on more comprehensive risk-reduction strategies through targeted pole replacements and system hardening under initiatives GH-02 and GH-03, implemented in conjunction with GH-01 (Line Rebuild-Covered Conductor Installation) and GH-16 (Undergrounding of Electric Lines and/or Equipment).

On occasion, PacifiCorp does deploy pole wraps reactively in limited wildfire situations where such installations are necessary to protect specific assets during emergent conditions. For these circumstances, PacifiCorp will provide the criteria used for making that determination and summarize the company's evaluation of its effectiveness.

**d) PC-26B-10. Continued Monitoring of Enhanced Safety Settings (ESS) and Emerging Grid Technology**

PacifiCorp requests that ACI PC-26B-10 be split into two separate ACIs. The requirements outlined in bullets 1 through 4 on pages 61-62 of the Draft Decision align with operational work that PacifiCorp is already undertaking. In contrast, bullet 5 would require the development of a new initiative to examine emergent technologies, which is distinct in scope, timeline, and resource needs from the operational tasks identified in the preceding bullets.

Separating these requirements into two ACIs would provide clearer alignment between each set of activities and their respective objectives, improve transparency in reporting, and ensure that the new technology-evaluation effort is appropriately scoped and tracked.

**e) PC-26B-11. Microgrids Feasibility and Implementation**

ACI PC-26B-11 requires PacifiCorp to provide the results of the microgrid feasibility studies; provide an implementation schedule for each proposed microgrid PacifiCorp decides to implement; and include any lessons learned from prior microgrid efforts and how they inform PacifiCorp's microgrid program.

PacifiCorp clarifies that the company does not have plans to conduct the microgrid feasibility studies described in ACI PC-26B-11. As detailed in clarifications above, Energy Safety's expectation for such studies is based on a misunderstanding of PacifiCorp's 2026-2028 WMP.

**f) PC-26B-13. Detailed Transmission Inspection Comparative Analysis**

ACI PC-26B-13 requires PacifiCorp to provide a comparative analysis of its transmission drone inspection program and detailed transmission inspection program.

PacifiCorp does not support the recommendation at this time because the drone inspection program is currently a pilot initiative. The 2026 inspection cycle is the first year in which drone inspections are being conducted under a structured five-year pilot cycle. The results from the first year may not be representative of long-term program performance and therefore cannot support a robust or reliable comparative analysis.

Given this uncertainty, PacifiCorp does not believe that comparing the pilot drone inspection program and the established detailed transmission inspection program at this stage would yield meaningful or actionable insights. However, while a comprehensive comparative analysis is not feasible during the pilot phase, PacifiCorp is able to provide the training documents, job aids, and related reference materials associated with the detailed transmission inspection program as requested.

At the conclusion of the five-year drone inspection pilot, sufficient data would be available to support a comparative analysis of similar condition types as defined in Procedure

069 and identified through each program. It should be recognized, however, that drone and detailed ground inspections are expected to identify different and complementary condition types, and are not intended to serve as direct substitutes.

Additionally, when comparing condition-find rates across investor-owned utilities, it is important to consider differences in inspection methodologies. For example, San Diego Gas & Electric and Pacific Gas & Electric incorporate aerial inspections – including helicopter and drone observations – into their detailed transmission inspection programs, whereas PacifiCorp’s detailed inspections remain fully ground-based. As such, drone inspections at PacifiCorp would supplement, not replace, condition findings and should be interpreted accordingly.

**g) PC-26B-14. Equipment Failure Data**

ACI PC-26B-14 requires PacifiCorp to provide historical data on equipment failure outage recordings; establish more reliable and comprehensive equipment failure data collection processes; and provide a description of PacifiCorp’s established equipment failure process.

In its next WMP filing, PacifiCorp can provide outage data recorded in the High Fire Threat District (HFTD) and High Fire Risk Area (HFRA) for the equipment failure cause categories identified in Attachment 1<sup>2</sup> and the component types identified in Attachment 2<sup>3</sup> for years 2023-2026. PacifiCorp notes that the company has limited ability to provide estimated equipment counts, as certain component inventories and information is not all managed or accounted for as an individual asset.

PacifiCorp recognizes that improvements are needed in this area and appreciates the value of Energy Safety’s recommendations. These recommendations span multiple departments and will require a comprehensive, cross-functional plan to address effectively. Some of the requested actions may be extremely challenging – and, in certain cases, may not be fully achievable – due to current system capabilities, historical data limitations, or operational constraints.

PacifiCorp is committed to strengthening data quality, transparency, and overall program performance, even where full compliance with individual recommendations may not be feasible. The Company will outline a detailed path forward in the next WMP cycle including: actions that can be achieved, areas where limitations exist, and how processes will continue to evolve to better align with regulatory expectations.

**h) PC-26B-19. Asset Management and Enterprise Systems**

ACI PC-26B-19 directs PacifiCorp to demonstrate its ability to migrate asset inventory, inspection, and maintenance data from its legacy mainframe to the new enterprise asset management (EAM) software suite, including a description of the end-to-end migration process, data integrity controls, quality thresholds, and the process for updating asset records following hardening or repair work.

Since submitting the 2026-2028 WMP, PacifiCorp has placed its EAM-related data migration work on hold. As a result, PacifiCorp is not able to provide the additional detail

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<sup>2</sup> Data Request 7 Question 3.

<sup>3</sup> Ibid.

requested by Energy Safety or to fulfill the requirements of ACI PC-26B-19 at this time. Recent corporate activities have necessitated a reassessment of resource allocation and investment priorities across the company. As part of this reassessment, PacifiCorp is evaluating the timing and scope of major projects to ensure alignment within its current corporate, operational and financial health needs.

PacifiCorp recognizes the importance of this ACI and the need for clear, detailed documentation of data migration processes, quality controls, and post-implementation asset update workflows. However, until the project resumes, PacifiCorp cannot meaningfully articulate the migration processes, or provide updated timelines, thresholds, or system integrator roles for its next WMP.

PacifiCorp remains committed to improving its asset management and enterprise systems and will provide updated information once the project timeline has been reestablished.

### **III. CONCLUSION**

PacifiCorp appreciates Energy Safety's thorough review of the company's 2026-2028 Base Wildfire Mitigation Plan and the opportunity to provide opening comments on the Draft Decision. In addition to PacifiCorp's general support for the Draft Decision, the company respectfully requests that Energy Safety consider the clarifications and recommended adjustments to the proposed ACIs described above to ensure that Energy Safety's final decision approving the company's 2026-2028 WMP accurately reflects the company's operational realities and ongoing commitment to mitigating wildfire risk.