

March 18, 2026

VIA OEIS E-FILING

Docket # 2026-2028-Base-WMPs

Tony Marino
Deputy Director, Electrical Safety Policy Division
Office of Energy Infrastructure Safety
715 P Street, 20th Floor
Sacramento, CA 95814
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RE: Response to Notice of Errata on PacifiCorp dba Pacific Power 2026-2028 Base Wildfire Mitigation Plan

Dear Deputy Director Marino:

PacifiCorp d/b/a Pacific Power (PacifiCorp or company) submitted its 2026-2028 Base Wildfire Mitigation Plan (Base WMP) on July 11, 2025. On November 26, 2025, the company submitted a revised 2026-2028 Base WMP R1 in response to the Office of Energy Infrastructure Safety's (Energy Safety) Revision Notice, dated October 13, 2025.

On March 3, 2026, the company received a Notice of Errata¹ from Energy Safety instructing PacifiCorp to revise its Base WMP R1 to address non-substantive errata. The Notice of Errata also allows the company to correct additional non-substantive errors. PacifiCorp submits this revision (R2) in response to the Notice of Errata with corrections set forth in the tables below.

The submittal includes the following:

1. Table 1 includes the non-substantive errata identified by Energy Safety.
2. Table 2 includes additional non-substantive errata identified by PacifiCorp in addressing the Notice of Errata sent by Energy Safety.
3. Redlined 2026-2028 Base WMP Revision 2: PC_2026-2028_Base-WMP_R2_Redline
4. Clean 2026-2028 Base WMP Revision 2: PC_2026-2028-Base-WMP_R2_Clean
5. Redlined Base WMP Data Tables: PC_2026-2028_Base-WMP_Data_Tables_R2_Redline
6. Clean Base WMP Data Tables: PC_2026-2028_Base-WMP_Data_Tables_R2_Clean

PacifiCorp will also post the 2026-2028 Base WMP Revision 2 to the company's website.²

¹ Notice of Errata on PacifiCorp dba Pacific Power 2026-2028 Base Wildfire Mitigation Plan
<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=60367&shareable=true>

² <https://www.pacificorp.com/community/safety/wildfire-mitigation-plans.html>

Table 1: Non-substantive errata identified by Energy Safety in the Notice of Errata received March 3, 2026.

Date of Submission	Section	Page(s)	Energy Safety Correction or Clarification Requested	Description of PAC Correction or Clarification	Substantive
3/18/2026	Section 3.6 Projected Expenditures	41	In Table 3-3, PacifiCorp listed the third year of expenditures as 2027.	PacifiCorp has revised Table 3-3 to list the third year as 2028.	No
3/18/2026	Section 8.1.2 Quantitative Targets	167	In Table 8-1, PacifiCorp appears to use incongruent values for mitigation activities AI-01 to AI-11 for Base WMP years 2026-2028 for columns “% planned in HFTD” and “% planned in HFRA” (e.g., it is not possible for 100 percent of patrol inspections to be planned in the HFTD and 100 percent to be planned in the HFRA).	PacifiCorp has revised Table 8-1 such that the correct “% planned in HFTD” and “% planned in HFRA” values for all “AI” mitigation activities for each year.	No
3/18/2026	Section 8.3 Asset Inspections	193	In its response to RN-PC-26-07, PacifiCorp did not include distribution drone or transmission drone inspections in Table 8-2. PacifiCorp made the necessary changes to Table 8-1, but not to Table 8-2.	PacifiCorp has updated the data in Table 8-2 to include a row for Distribution Drone (AI-09) and Transmission Drone (AI-10).	No
3/18/2026	Section 8.3 Asset Inspections	193	In Table 8-2, PacifiCorp transposed transmission and distribution infrared activity values in column “% of HFRA and HFTD Covered Annually by Inspection Type.” PacifiCorp did not provide the correct values in the respective rows of the column.	PacifiCorp has revised Table 8-2 to amend the transposed cells in column “% of HFRA and HFTD Covered Annually by Inspection Type” to reflect correct percentages for transmission infrared and distribution infrared activities.	No

Date of Submission	Section	Page(s)	Energy Safety Correction or Clarification Requested	Description of PAC Correction or Clarification	Substantive
3/18/2026	Section 9.1 Targets	279-280	In Table 9-1, PacifiCorp provided insufficient information regarding specificity and measurability of its qualitative targets. PacifiCorp improved the specificity and measurability of its qualitative targets in its response to RN-PC-26-02, but PacifiCorp did not incorporate details it included in its response to Data Request OEIS-P-WMP_2025-PC-04, Questions 7 and 8 into its RN response or its 2026-2028 Base WMP R1.	PacifiCorp has revised Table 9-1 to update the qualitative targets to reflect the details that were provided in its response to Data Request OEIS-P-WMP_2025-PC-04, Questions 7 and 8.	No
3/18/2026	Section 9.5 Wood and Slash Management/Debris Disposal	309	PacifiCorp used undefined terms in its description of slash/debris management practices for “developed,” “undeveloped,” and “inaccessible.”	PacifiCorp has revised the narrative in Section 9.5 to include definitions for “developed,” “undeveloped,” and “inaccessible” that were provided in its response to Data Request OEIS-P-WMP_2025-PC-16, Question 2.	No
3/18/2026	Section 9.12 Work Orders	331	PacifiCorp mislabeled Section 9.12 Work Orders as “9.12 Open Work Orders.” PacifiCorp did not adhere to the WMP Guidelines, page 121, naming convention, which requires the title of Section 9.12 to be “Work Orders.”	PacifiCorp has revised the title in Section 9.12 to be “Work Orders,” removing the term “Open,” and updated the Table of Contents accordingly.	No

Date of Submission	Section	Page(s)	Energy Safety Correction or Clarification Requested	Description of PAC Correction or Clarification	Substantive
3/18/2026	Section 11.1 Targets	397	In Table 11-1, PacifiCorp included the year 2026 for all three yearly status columns. For initiative #CO-03, in columns “2027 Status” and “2028 Status,” PacifiCorp did not use the correct year.	PacifiCorp has revised Table 11-1 to correctly label the years in the 2027 Status and 2028 Status columns for CO-03.	No
3/18/2026	Section 12.2 Summary of Enterprise Systems	458	PacifiCorp did not provide a definition of “SFTP.” In response to OEIS-P-WMP_2025-PC-03, Question 2, PacifiCorp defines "SFTP" as secured file transfer protocol.	PacifiCorp has revised the narrative in Section 12.2 to include the definition for “SFTP,” Standard File Transfer Protocol, that was provided in its response to Data Request OEIS-P-WMP_2025-PC-03, Question 2.	No
3/18/2026	Section 13.1 Description and Summary of Lessons Learned	462- 463	In Table 13-1, PacifiCorp did not include lessons learned from Energy Safety compliance audits and reports, as required by the WMP Guidelines, page 181. PacifiCorp provided a lesson learned from Energy Safety compliance audits and reports in its response to Data Request OEIS-PWMP_2025-PC-13, Question 9.b.	PacifiCorp has revised Table 13-1 to include the response it provided to Data Request OEIS-P-WMP_2025-PC-13, Question 9.b.	No
3/18/2026	Appendix D	541	PacifiCorp provided an incorrect citation in Appendix D. PacifiCorp cited “CPUC 4427 and 4428 rules” instead of California Public Resources Code sections 4427 and 4428.	PacifiCorp revised the incorrect citation to “California Public Resources Code (PRC) sections 4427 and 4428.”	No

Table 2: Non-substantive errata identified by PacifiCorp in addressing the Notice of Errata received March 3, 2026.

Date of Submission	Section	Page(s)	PacifiCorp Correction or Change	Reason for Change	Substantive
3/18/2026	WMP	4-17, 167, 279-280, 283, 343, 396-397, and 453	Updated page numbers in TOCs and in Tables 8-1, 9-1, 9-2, 10-1, 11-1, 12-1.	Some page numbers changed with this R2 version. In addition, PacifiCorp noticed page numbers were incorrect in the R1 filing.	No
3/18/2026	Section 8.1.2 Quantitative Targets and Section 8.3 Asset Inspections	167 and 193	PacifiCorp has revised Tables 8-1 and 8-2 to amend the rows related to Transmission and Distribution Infrared Inspections.	PacifiCorp transposed the targets for Transmission and Distribution Infrared Inspections (AI-07 +AI-08).	No
3/18/2026	Section 8.7.3 Personnel Work Procedures and Training in Conditions of Elevated Wildfire Risk	270	PacifiCorp corrected the reference “CPUC 4427 and 4428 rules” to “California Public Resources Code (PRC) sections 4427 and 4428.”	PacifiCorp noticed the incorrect citation when correcting the same citation in Appendix D.	No
3/18/2026	Section 12.2 Summary of Enterprise Systems	458	Changed "associates" to "associated."	Grammar	No
3/18/2026	Section 12.2 Summary of Enterprise Systems	458	PacifiCorp clarified the sentence articulating the exchange of data between GIS and vendor, MapIt Fast/VM Optix.	Grammar	No
3/18/2026	Appendix E	550-551	PacifiCorp corrected “CA CPUC 4427” to “CA PRC 4427” and “CA CPUC 4428” to “CA PRC 4428” in Table PAC E-1.	PacifiCorp noticed the incorrect citations when correcting the same citation in Appendix D.	No

Date of Submission	Section	Page(s)	PacifiCorp Correction or Change	Reason for Change	Substantive
3/18/2026	Section 3.3 Utility Mitigation Activity Tracking ID	33	PacifiCorp removed SA-05 from Table PAC 3-1.	Based on changes required in the November 2025 Revision Notice, PacifiCorp is no longer using Initiative Tracking ID SA-05.	No
3/18/2026	Section 10.4.1 Existing Ignition Detection Sensors and Systems	364	Updated Tracking ID from SA-05 to SA-11.	Corrected for updated Tracking ID	No
3/18/2026	Section 10.5 Weather Forecasting	372	Updated Tracking ID from SA-05 to SA-12.	Corrected for updated Tracking ID	No

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

Sincerely,



Robert Meredith Director, Regulation