

April 1, 2026

***VIA OEIS E-FILING***

Docket #WMP-Guidelines

Tony Marino  
Deputy Director  
Office of Energy Infrastructure Safety  
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Sacramento, CA 95814  
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**RE: PacifiCorp Comments on the Office of Energy Infrastructure Safety’s March 23, 2026 Public Workshop on Senate Bill 254 Implementation**

Dear Deputy Director Marino:

PacifiCorp d/b/a Pacific Power (PacifiCorp or the company) appreciates the opportunity to provide comments regarding the questions discussed at the Office of Energy Infrastructure Safety’s (Energy Safety) March 23, 2026, workshop on the “Implementation of Cost-per-Avoided Ignition and Wildfire Mitigation Plan (WMP) Schedule Pursuant to Senate Bill 254 Requirements.” As stated in the letter submitted by the Joint Investor-Owned Utilities following the workshop, we respectfully request utilities and other stakeholders be allowed to submit comments by April 27, 2026, as originally published in the workshop notice, to allow sufficient time for the development of thorough responses. In light of the revised timeline, however, the company additionally provides the following brief comments.

PacifiCorp understands the importance and implications of Senate Bill 254 and will work to implement any required changes into its risk analysis framework. Consistent with workshop discussions regarding the potential inclusion of a cost-per-avoided-ignition metric, the company provides two additional considerations.

First, cost-per-avoided-ignition is implicitly included in the current benefit-cost ratio (BCR) whereby wildfire risk is evaluated as the product of likelihood and consequence. The addition of cost-per-avoided-ignition either into the existing BCR framework or as a separate requirement for mitigation planning would weight mitigation efforts toward circuit segments with higher historical or modeled ignition rates, regardless of consequence. This approach could lead to mitigation recommendations for locations where wildfire spread to structures or population centers is unlikely. PacifiCorp therefore recommends that wildfire risk assessment and the associated benefit-cost analysis continue to be based on both the likelihood and consequence of risk events, as this approach enables mitigation planning to target locations with the most significant expected wildfire risk and impact.

Second, PacifiCorp's current probability of fault (POF) and probability of ignition (POI) are provided as components of the Technosylva FireSight model outputs. POF and POI are combined with conditional risk to produce the expected risk, which is currently used in its benefit-cost analysis. The addition of cost-per-avoided-ignition to this analysis would require significant time and investment for exploratory data analysis to determine whether the existing Technosylva product could fulfill this requirement or whether separate modeling would be necessary. PacifiCorp recently has begun to examine the possibility of developing POF and POI models as internal products that could replace or supplement the vendor-provided outputs. Initial estimates indicate that development of such internal models would require *at least* one year from project initiation to completion. The examination of developing internal POF and POI models is not in PacifiCorp's Risk Assessment Improvement Plan detailed in Section 5.7 of the 2026-2028 Wildfire Mitigation Plan.

PacifiCorp appreciates Energy Safety's leadership and the opportunity to comment on questions posed at the workshop. As stated in comments filed concurrently with the large investor-owned utilities, PacifiCorp would appreciate the opportunity to provide more thorough responses regarding the March 23, 2026 workshop and looks forward to continued collaboration with Energy Safety 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, Regulatory Affairs Manager at [pooja.kishore@pacificorp.com](mailto:pooja.kishore@pacificorp.com) or 503-813-7314.

Respectfully Submitted,



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