



825 NE Multnomah, Suite 2000
Portland, Oregon 97232

April 2, 2026

Jolynne Flores
Wildfire Safety Analyst
Jolynne.Flores@energysafety.ca.gov

Dakota Smith
Dakota.Smith@energysafety.ca.gov

Steve Kerr
Steve.Kerr@energysafety.ca.gov

Johan Im
Johan.Im@energysafety.ca.gov

RE: CA 2025-WMPs
OEIS-P-WMP_2025-PC-22

Please find enclosed PacifiCorp's Responses to OEIS Data Requests 22.1-22.2. Also provided are Attachments OEIS 22.1-1, 22.1-2, and 22.1-3.

If you have any questions, please call me at (503) 813-7314.

Sincerely,

_____/s/_____
Pooja Kishore
Manager, Regulation

OEIS Data Request 22.1

Regarding PacifiCorp’s Opening Comments on PC-26B-19 Asset Management and Enterprise Systems: On pages 5-6 of PacifiCorp’s Opening Comments to Energy Safety’s Draft Decision,¹ PacifiCorp stated that it has placed its enterprise asset management (EAM)-related data migration work on hold since its 2026-2028 Base WMP submission. Also, PacifiCorp stated that it cannot provide additional details on PC-26B-19 at this time due to a “reassessment of resource allocation and investment priorities,” which evaluate the timing and scope of major projects.

- (a) Provide a timeline, including specific dates and milestones, for this reassessment of resource allocation and investment priorities.
- (b) Describe the status of the EAM data migration project, including:
 - i. When it was placed on hold,
 - ii. The scope of the work completed to date, and
 - iii. The key decision points that led to placing the project on hold.
- (c) Describe the conditions that must be met for PacifiCorp to resume the EAM data migration project.
- (d) PacifiCorp stated that it “cannot meaningfully articulate migration processes, timelines, thresholds, or system integrator roles” while the project is on hold. Clarify which of the following PC-26B-19 requirements PacifiCorp anticipates it will not be able to provide in its next Base WMP submission:
 - i. Its end-to-end data migration process, including how its system integrator supports the extraction, transformation, validation, and loading of asset inventory, inspection, and maintenance data from the legacy asset database system to the EAM system.
 - ii. Its data quality thresholds or quantitative acceptance criteria used to confirm data integrity, completeness, and accuracy.
 - iii. Its timeline for when PacifiCorp expects to begin and complete the full data conversion.

¹ [PacifiCorp Opening Comments on 2026-2028 Base WMP Draft Decision](https://efiling.energy.ca.gov/eFiling/Getfile.aspx?fileid=59778&shareable=true), Published March 18, 2026, URL:(<https://efiling.energy.ca.gov/eFiling/Getfile.aspx?fileid=59778&shareable=true>)

- iv. Its post-implementation data verification process, including the scope of verification by its business unit, the criteria used to determine data completeness and accuracy, and how verification results are documented, approved, or governed.
 - v. Its end-to-end process for updating asset records in the EAM system following hardening or repair work, including how updates are verified and the expected timeliness for reflecting completed work in the system of record.
- (e) Provide preliminary and planning-level materials for the EAM data migration project.

Response to OEIS Data Request 22.1

- (a) PacifiCorp's liquidity has been materially impacted, and its credit ratings have been downgraded as a result of the litigation risk and estimated losses recorded to date associated with wildfires that occurred in 2020. PacifiCorp requires capital to support its liquidity needs, to fund ongoing operations, and continue to meet its customers' needs, as well as sufficient liquidity to stabilize and support its credit rating.

Beginning in late 2025, PacifiCorp initiated a comprehensive review of capital and operating expenditures to address its financial challenges. Through this process, the company determined that the enterprise asset management (EAM) replacement would not move forward within the 2026-2028 Wildfire Mitigation Plan (WMP) cycle. As part of PacifiCorp's review of capital costs and operating expenses, its focus continues to be on safety and wildfire mitigation. PacifiCorp will continue to evaluate resources and investments throughout 2026.

- (b) Please refer to PacifiCorp's responses to subparts i. through iii. below:
- i. A decision to further defer the project was made in late 2025 where planning was scheduled to start in Q4 2026 with delivery in January 2029. An opportunity was evaluated in January 2026 to begin project activities earlier and address system needs; however, resource constraints as described in the company's response to subpart (a) above did not enable this. PacifiCorp remains dedicated to ensuring alignment of resources and investments to the most critical activities and will continue to evaluate the timeline for an EAM replacement.
 - ii. To date, scoping, requirements, preliminary design, and legacy system analysis were identified for the EAM replacement.
 - iii. PacifiCorp evaluated the impact on internal resource availability and liquidity impacts to support a program of this magnitude, against the needs to focus on core operations, wildfire, safety, and compliance activity. PacifiCorp further assessed the interdependence between related projects and determined the best approach

was to keep the EAM replacement aligned with other required system changes (e.g., asset accounting, joint use, and field solutions).

- (c) Please refer to the company's responses to subparts (a) and (b)i. above.
- (d) Until a revised program delivery with detailed milestones and project deliverables are identified, the exact process, criteria, and quality metrics will not be established. The steps and deliverables described below are generic and not specific to the EAM data migration project.

During project execution, conversion follows a structured Extract-Transform-Load (ETL) methodology, reinforced by multiple mock conversion cycles, comparison reports, business verification, and formal entry/exit criteria for program stages. Each mock cycle has different targets for data completeness, working towards full data loads prior to a joint dress rehearsal, and data is utilized during iterative system test cycles to help identify operational readiness in real-world scenarios. Data integrity steps include continuous data cleansing through mock cycles, utilizing secure data transfer methods, and access controls. The validation steps include:

Pre-Load Validation: Confirm extract filter criteria and mapping accuracy before loading.

Post-Load Validation: Validate transformed data in the target system.

Exception Reporting: Identify discrepancies, gaps in conversion, and resolve defects iteratively.

Defects are tracked in Azure DevOps and reporting dashboards are used to track resolution.

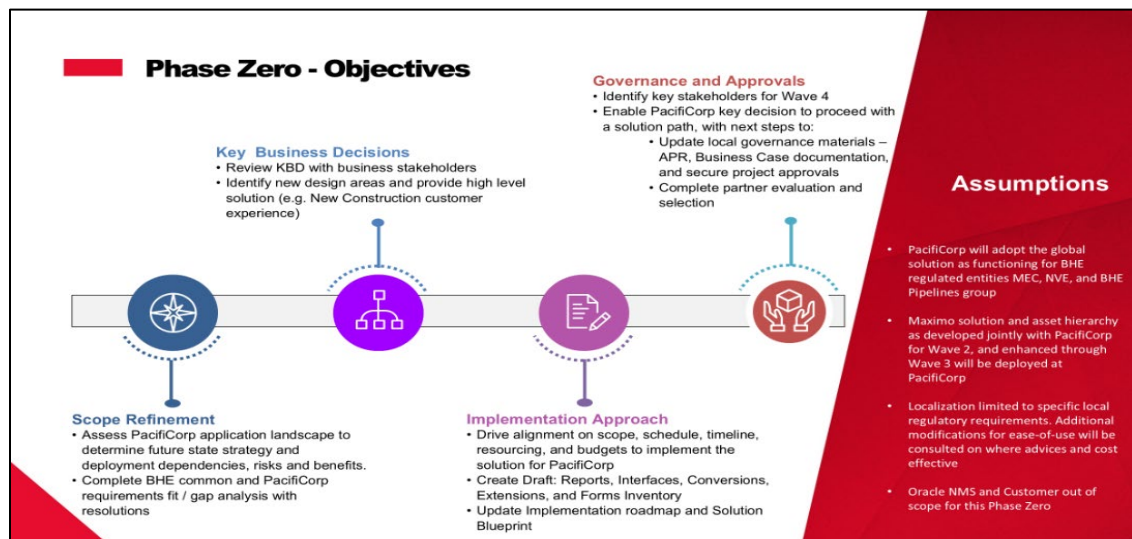
Formal Entry/Exit criteria are used as checkpoints for each stage of the project and data to support the project prior to moving forward.

Please refer to the attachments listed below for general information on data conversion:

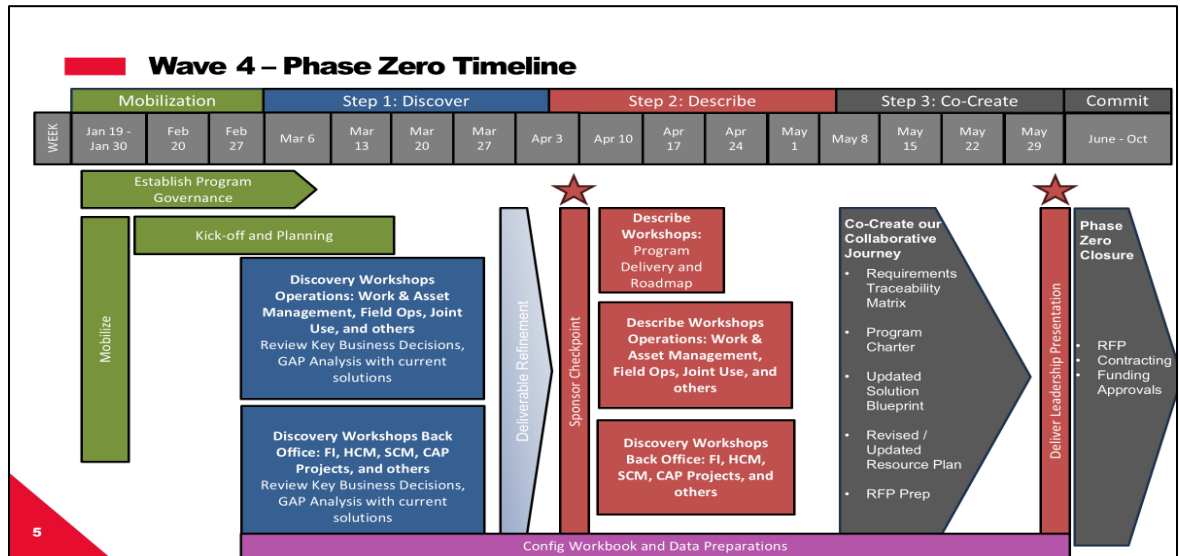
- Attachment OEIS 22.1-1: Data Profiling and Cleansing
- Attachment OEIS 22.1-2: Mock Entry / Exit Criteria and Targets
- Attachment OEIS 22.1-3: Data Conversion Relevancy Rules

- i. Please refer to the company's response to subpart (d) above.
- ii. Please refer to the company's response to subpart (d) above.

- iii. A timeline will be established when planning commences on the EAM system replacement, aligned with other system changes. Full data conversion is done over a period of milestones aligned to design, system test cycles, data readiness criteria, and cutover activities during go live.
 - iv. Please refer to the company's response to subpart (d) above.
 - v. Please refer to the company's response to subpart (d) above.
- (e) Due to the EAM project being placed on hold, there are no preliminary and planning-level materials for the EAM data mitigation. In the figures below, PacifiCorp presents the timeline of Phase Zero planning activities that would have happened in 2026 if the decision was made to move the project forward. When a decision is made to move the EAM project forward as described in the company's response to subpart (a) above, PacifiCorp will begin planning at Phase Zero with similar activities.



Despite PacifiCorp's diligent efforts, certain information protected from disclosure by the attorney-client privilege or other applicable privileges or law may have been included in its responses to these data requests. PacifiCorp did not intend to waive any applicable privileges or rights by the inadvertent disclosure of protected information, and PacifiCorp reserves its right to request the return or destruction of any privileged or protected materials that may have been inadvertently disclosed. Please inform PacifiCorp immediately if you become aware of any inadvertently disclosed information.



Wave 4 Phase Zero Proposed Timeline

Key Milestones	Proposed Date	Outcomes
Planning phase review and alignment with PacifiCorp stakeholders	February 12, 2026	Resource Identification, Guiding Principals
Planning phase kickoff	February 19, 2026	Kick off presentation
PacifiCorp review of existing global design documentation and familiarization	February 29 – April 30, 2026	Documentation Review
Workshop planning and scheduling	February 23 – April 10, 2026	Daily/Weekly schedule of workshops for each functional area
Global design blueprint & process validation workshops (with ancillary scope requirements)	March 2 – May 15, 2026	Confirmation of scope, solution gap analysis for each functional area
Sponsor Checkpoint – key findings from current workshops	April 9, 2026	Status review, major scoping discussion
PacifiCorp Requirements Traceability Matrix (RTM) complete	May 22, 2026	Requirements captured from workshops
PacifiCorp decision on materials prepared prior to RFP	May 29, 2026	Approval to proceed to RFP with defined scope
Partner bid requests extended	June 1 – August 24, 2026	RFP conducted for services
Contracting	September 1 – October 23, 2026	Negotiated contracts
Program Phase 0 Exit Decision	October 31, 2026	Funding approval and decision to proceed

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OEIS Data Request 22.2

Regarding PacifiCorp's Reassessment of Resource Allocation and Investment

Priorities: On page 6 of PacifiCorp's Opening Comments to Energy Safety's Draft Decision, PacifiCorp stated that it cannot provide additional details on PC-26B-19 at this time due to a "reassessment of resource allocation and investment priorities," which evaluate the timing and scope of major projects.

- (a) Provide documentation that directs the "reassessment of resource allocation and investment priorities" which evaluate the timing and scope of major projects.
- (b) Describe all PacifiCorp 2026-2028 Base WMP wildfire mitigation work that may be affected by the "reassessment of resource allocation and investment priorities," which evaluate the timing and scope of major projects.

Response to OEIS Data Request 22.2

- (a) The direction to place the enterprise asset management (EAM) system on hold was communicated by PacifiCorp executive leadership.
- (b) At this time, PacifiCorp has not identified other 2026-2028 Base Wildfire Mitigation Plan (WMP) work that may be impacted by the reassessment of resource allocation and investment priorities. As stated in PacifiCorp's response to OEIS Data Request 22.1 subpart (a), as part of PacifiCorp's review of capital costs and operating expenses, the company's focus continues to be on safety and wildfire mitigation.