

April 1, 2026

VIA OEIS E-FILING

Docket #2025 EC AIR

Tony Marino
Deputy Director
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715 P Street, 20th Floor
Sacramento, CA 95814
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RE: PacifiCorp's 2025 Annual Implementation Report

Dear Deputy Director Marino:

PacifiCorp d/b/a Pacific Power (PacifiCorp or company) provides the attached 2025 Annual Implementation Report (AIR) pursuant to Public Utilities Code § 8386.3(b)(1),¹ addressing the company's implementation of its WMP over the period covering January 1 through December 31, 2025.

This Report is submitted in accordance with the Office of Energy Infrastructure Safety's December 2025 Performance Guidelines, Section 6.0, Electrical Corporation Annual Implementation Report.

If you have any questions regarding this Annual Implementation Report, please contact Pooja Kishore, Regulatory Affairs Manager at (503) 813-7314 or pooja.kishore@pacificorp.com.

Sincerely,



Robert Meredith
Director, Regulation

¹ Public Utilities Code section 8386.3(b)(1) requires each electrical corporation to annually file with Energy Safety a self-evaluation report addressing the electrical corporation's implementation of its approved WMP during an implementation period.



**2025 PacifiCorp
Wildfire Mitigation Plan
Annual Implementation Report**

April 1, 2026

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LIST OF ABBREVIATIONS

ABBREVIATION	TERM
AFN	Access and Functional Needs
AIR	Annual Implementation Report
CPUC	California Public Utilities Commission
DOC	Department Operations Center
ECC	Emergency Coordination Center
EFR	Elevated Fire Risk
EPG	Executive Policy Group
ESS	Emergency Safety Settings
FPI	Fire Potential Index
FPI	Facility Point Inspection
GIS	Geographic Information System
HFRA	High Fire Risk Area
HFTD	High Fire Threat District
MDMS	Mobile Data Management System
PEDS	Protection Equipment Device Settings
PSP	Public Safety Partner
PSPS	Public Safety Power Shutoff
QA/QC	Quality Assurance/Quality Control
QDR	Quarterly Data Report
RSE	Risk-Spend Efficiency
SAP	Systems, Applications, and Products in Data Processing
WMP	Wildfire Mitigation Plan
WRF	Weather Research and Forecasting
WRRM	Wildfire Risk Reduction Model

1. INTRODUCTION

Pursuant to California Public Utilities Code Section 8386.3(c)(1), PacifiCorp provides this Annual Implementation Report (AIR) addressing the company's implementation of its 2025 Wildfire Mitigation Plan (WMP) Update. PacifiCorp received approval for the 2025 WMP Update¹ from the California Office of Energy Infrastructure Safety (Energy Safety) on April 28, 2025.

BACKGROUND

During calendar year 2025, the company worked diligently to implement the measures set forth in its 2023–2025 WMP and address the areas for continuous improvement in the Decision on the 2025 Wildfire Mitigation Plan Update.² The company previously reported detailed WMP progress in ongoing data reports to Energy Safety throughout 2025 and early 2026. These include PacifiCorp's four 2025 quarterly data reports submitted May 2025, August 2025, November 2025, and February 2026, and the end-of-year report filed in February 2026.

PacifiCorp submits this 2025 Annual Implementation Report (2025 AIR) in accordance with the requirements set forth in the December 12, 2025 Performance Guidelines issued by Energy Safety, including a written narrative, a list of approved petitions to amend the WMP, and a detailed explanation of initiative-level planned versus actual spend.

2. PROGRESS ON OBJECTIVES

2.1 SUMMARIZED OBJECTIVES

PacifiCorp continues to make progress toward achieving the objectives identified in the company's three- and ten-year WMP plan cycle. This section addresses progress for each objective listed in the Summary of Plan Objectives from Section 4.2 of the company's revised 2023–2025 Base WMP.

¹ [PacifiCorp 2023-2025 Base WMP R6, January 17, 2025.](#)

² [Office of Energy Infrastructure Safety Decision on PacifiCorp 2025 WMP Update, April 2025.](#)

Table 1: Summary of Plan Objectives

Initiative Category	Objectives
Risk Methodology and Assessment	<ul style="list-style-type: none"> • Complete implementation of FireSight, previously known as the Wildfire Risk Reduction Model (WRRM), and ignition risk assessment in 2023. • Complete Public Safety Power Shutoff (PSPS) risk assessment in 2024. • Continue refinement of risk-spend efficiency (RSE) calculation methodology and calculate RSE for grid hardening initiatives.
Grid Design, Operations, and Maintenance	<ul style="list-style-type: none"> • Continue execution of grid hardening plans. • Continue planned inspection programs, including infrared inspections on transmission lines. • Begin implementation of the infrared inspection on distribution lines. • Continue to deploy Enhanced Safety Settings (ESS), previously known as Elevated Fire Risk (EFR) settings.
Vegetation Management	<ul style="list-style-type: none"> • Continue progressing programs (annual patrols, routine cycle work, and annual pole clearing). • Implement Enhanced Overhang Reduction pilot project.
Situational Awareness and Forecasting	<ul style="list-style-type: none"> • Complete implementation of the Fire Potential Index (FPI). • Deploy Wildfire Detection Network (wildfire detection cameras and smoke sensors). • Evaluate Distribution Fault Anticipators (DFA). • Expand weather station network.
Emergency Preparedness	<ul style="list-style-type: none"> • Continue use of tabletop exercises to prepare for emergencies and PSPS events. • Incorporate feedback and industry best practices into emergency management practices. • Implement improvements to Public Safety Partner Portal (PSP Portal).
Community Outreach and Engagement	<ul style="list-style-type: none"> • Enhance customer outreach based on survey feedback and industry best practices. • Implement customer feedback from post-season wildfire mitigation surveys into future outreach efforts. • Increase outreach to access and functional needs (AFN) populations.
PSPS	<ul style="list-style-type: none"> • Evaluate expansion of the free portable battery and backup electric power rebate programs.

2.1.1 RISK METHODOLOGY AND ASSESSMENT

Complete implementation of FireSight, previously known as the Wildfire Risk Reduction Model (WRRM), and ignition risk assessment in 2023 – PacifiCorp completed the implementation of FireSight risk data and has identified circuits with the highest ignition risk within the company’s California service territory.

Initially, PacifiCorp used FireSight risk data to calculate a composite fuel/terrain-driven and wind-driven fire risk score. By the end of 2025, the company implemented a new scoring methodology that uses FireSight risk data along with additional data and analytical techniques to produce monetized expected risk scores at the circuit segment level. FireSight risk data was also used in conjunction with the United States Forest Service Wildfire Hazard Potential data to identify geographic areas designated as High Fire Risk Areas (HFRA). PacifiCorp will continue to leverage FireSight risk data in ongoing wildfire risk assessment and mitigation planning model development.

Complete Public Safety Power Shutoff (PSPS) risk assessment in 2024 – PacifiCorp finalized the first version of its PSPS risk assessment for its California service territory. This assessment quantifies PSPS-related risk at the circuit-segment level and expresses that risk in monetized terms (U.S. dollars).

Continue refinement of risk-spend efficiency (RSE) calculation methodology and calculate RSE for grid hardening initiatives – In the fourth quarter of 2025, PacifiCorp reached a critical benchmark in RSE refinement. The RSE component of PacifiCorp’s risk assessment and mitigation planning model can now assess the risk associated with circuit segments in monetized terms (U.S. dollars), and using mitigation cost and effectiveness estimates, estimate the RSE of line rebuild options for specific circuit segments. With these expanded capabilities, PacifiCorp’s mitigation planning model can evaluate and recommend grid hardening strategies based on a comparative risk reduction value and RSE, supporting data-driven wildfire mitigation decision-making. Because this enhancement was completed late in Q4 2025, quantified risk-reduction values for 2025 grid-hardening work are not yet available.

2.1.2 GRID DESIGN, OPERATIONS, AND MAINTENANCE

Continue execution of grid hardening plans – PacifiCorp continues to progress through its grid hardening program through ongoing efforts to install covered conductor, replace distribution and transmission wooden poles, and enhance fault detection capabilities through system automation equipment installations and expulsion fuse replacements.

Continue planned inspection programs, including infrared inspections on transmission lines – In 2025, PacifiCorp completed 692 of the 700 planned miles of transmission infrared inspections. The variance is attributable to approximately eight miles of decommissioned lines that were still included in the maintenance plan when annual targets were set. The segments that constitute approximately eight miles do not require inspection due to removal from service. When the decommissioned segments are excluded, PacifiCorp met the target scoped for 2025. This annual program will continue in 2026.

Begin implementation of infrared inspection on distribution lines – PacifiCorp completed the planned 1,300-mile infrared inspection scope for distribution assets located within the High Fire Threat District (HFTD) and HFRA by the third quarter of 2025. Beginning in 2026, distribution infrared inspections will continue using an updated data-capture method that incorporates drone-based imagery to enhance inspection efficiency and improve data quality.

Continue to deploy Enhanced Safety Settings (ESS) – PacifiCorp continues to deploy ESS, previously known as Elevated Fire Risk (EFR) settings, on capable devices throughout the company’s service territory. In 2025, ESS were implemented on 45 devices. The company also continues to upgrade existing protective devices where appropriate, to expand the network of ESS-capable devices and increase coverage on additional circuits and line segments.

2.1.3 VEGETATION MANAGEMENT

Continue progressing programs (annual patrols, routine cycle work, and annual pole clearing) – PacifiCorp continues to advance its vegetation management programs through vegetation inspections, routine cycle work, and pole clearing around distribution and transmission electric lines. These programs are designed to maintain required clearances, reduce vegetation-related wildfire risk, and support overall system safety and reliability.

Detailed information on vegetation-related work completed in 2025 is provided in Table 6 below.

Implement Enhanced Overhang Reduction pilot project – PacifiCorp completed the Enhanced Overhang Reduction pilot project in 2025 and evaluated the pilot results against operational feasibility, cost, and anticipated wildfire risk reduction. The evaluation indicated that expanding the pilot would not provide a proportionate benefit relative to the resources required and, therefore, will not be extended at this time.

2.1.4 SITUATIONAL AWARENESS AND FORECASTING

Complete implementation of Fire Potential Index (FPI) – PacifiCorp completed implementation of the FPI in 2023 using a third-party software platform. FPI enables the company to update the data inputs used in the District Fire Risk categories. Factors such as weather, fuels, and terrain inputs can help quantify the potential for large or consequential wildfires several days in advance.

Deploy Wildfire Detection Network (wildfire detection cameras and smoke sensors) – PacifiCorp did not install any wildfire detection cameras in 2025, as none were planned for 2025. Two installations are planned for 2026.

Expand weather station network – PacifiCorp expanded its weather station network with eight new installations in 2025 and will continue expansion through 2026 and 2027.

2.1.5 EMERGENCY PREPAREDNESS

Continue use of tabletop exercises to prepare for emergencies and PSPS events – PacifiCorp continued the use of tabletop exercises throughout 2025. On March 21, 2025, PacifiCorp held its Wildfire Advisory Board meeting with participation from public safety partners and representatives from other local agencies, tribal partners, and regulatory agencies. The bi-annual meeting covers a variety of topics, including an overview of the company’s Emergency Response Plan, Public Safety Power Shutoff Playbook, Community Resource Center Playbook, and Access and Functional Needs Plan, along with details for planned tabletop and functional exercises.

On May 27, 2025, PacifiCorp conducted a tabletop exercise simulating a PSPS in Del Norte County, California. The three-hour exercise was held at the Crescent City fire hall with an option for virtual attendance.

On June 5, 2025, PacifiCorp conducted a functional exercise that included partners from its California service territory. The exercise was held virtually and focused on communications with the public and public safety partners during a PSPS event.

Incorporate feedback and industry best practices into emergency management practices – In 2025, PacifiCorp’s Emergency Management team participated in conferences, workshops, and forums to stay informed of industry practices and emerging approaches to emergency preparedness. The team also observed and participated in exercises and trainings hosted by other utilities to support ongoing awareness and continuous improvement.

Implement improvements to Public Safety Partner (PSP) Portal – In 2025, PacifiCorp updated the company’s Public Safety Partner (PSP) Portal to enhance usability and support public safety partner access to operational information. Updates included enhancements to web-based functionality to align with California Public Utilities Commission (CPUC) PSP Portal requirements, refinements to interactive mapping features, and improvements to information display to support coordination before and during PSPS events.

2.1.6 COMMUNITY OUTREACH AND ENGAGEMENT

Enhance customer outreach based on survey feedback and industry best practices – In 2025, PacifiCorp conducted two surveys and partner interviews to assess the company’s wildfire communication, education, outreach materials and strategies. In 2025, PacifiCorp refined the company’s pre-wildfire season survey questions to minimize jargon and simplify language to improve customer comprehension of survey questions. Additional surveys in 2026 will inform further enhancements.

Implement customer feedback from post-season wildfire mitigation surveys into future outreach efforts – Based on survey feedback received in 2024, PacifiCorp enhanced its pre-season notifications, upgraded its customer outage map and alerting tools, and developed targeted materials for master metered customers.

Increase outreach to access and functional needs (AFN) populations – In 2025, PacifiCorp enhanced its accessibility resources by creating an Accessibility Programs webpage³; developing an Accessibility Programs Toolkit for partner organizations; developing a Master Meter and Tenant Preparedness Toolkit; and creating an Accessibility Programs flyer. All materials are in English and Spanish. At the end of the second quarter, PacifiCorp launched an AFN Self-Certification form on the Accessibility Programs webpage. Additionally, PacifiCorp website links were added to the state’s Joint IOU Prepare for Power Down website.

In 2025, programs for AFN customers were highlighted in customer emails and bill messages. Tenant preparedness information was emailed to master meter/property manager/landlord customers and included information to share with their tenants. Additionally, customers with AFN who completed 2025 wildfire messaging surveys were mailed or emailed information about customer programs, based on their contact preference.

³ PacifiCorp “Supporting accessibility needs” webpage: <https://www.pacificpower.net/outages-safety/access-and-functional-needs.html>.

2.1.7 PSPS

Evaluate expansion of the free portable battery and backup electric power rebate programs

– In 2025, the company’s enhanced outreach to customers with access and functional needs, as described above in 2.1.6 Community Outreach and Engagement, included information about the backup power programs. Customer awareness increased from the 2023 baseline of 8% to 30% in the November 2025 survey. Among those aware of the program, 33% learned about it through the Pacific Power website, 13% reported using the rebate, and 68% indicated satisfaction with the program. These results informed PacifiCorp’s ongoing assessment of program effectiveness and opportunities to support backup power access.

2.2 DETAILED OBJECTIVES

The tables below summarize PacifiCorp’s progress toward achieving the three- and ten-year detailed objectives listed in the tables from Section 8 of the 2023–2025 Base WMP.

Table 2: Three-Year Objectives

Objectives for Three Years (2023–2025)	Applicable Initiative(s), Tracking ID(s)	Reference (section & page #)	Completion Date Listed in Approved WMP	Progress Summary (2025 Year-End Response)
Grid Design, Operations, and Maintenance				
Continue execution of grid hardening plans.	GH-01 GH-02 GH-03 GH-04	8.1.2 pp. 154-161	Dec 2025 for 2023-2025 targets	Installed 123 line miles of covered conductor. Replaced 2,544 distribution poles. Replaced 250 transmission poles. Installed 23 system automation devices.
Replace all expulsion fuses within the HFTD and HFRA.	GH-05	8.1.2.12 p. 161	Dec 2025	Completed 932 fuse replacements.
Continue planned inspection programs.	AI-01 AI-02 AI-03 AI-04 AI-05 AI-08	8.1.3 pp. 162-170	Annually to Jan 2025	Completed 12,032 transmission patrol inspections. Completed 58,741 distribution patrol inspections. Completed 509 transmission detail inspections. Completed 18,556 distribution detail inspections. Completed 1,246 transmission intrusive pole inspections. Completed 3,162 distribution intrusive pole inspections.
Continue planned transmission and distribution wires maintenance.	MA-01	8.1.4 pp. 173-175	Annually to Jan 2025	Completed 130 planned transmission and distribution wires maintenance.
Continue planned substation apparatus maintenance programs.	MA-01	8.1.4 pp. 173-175	Annually to Jan 2025	Completed 489 planned substation apparatus maintenance.

Objectives for Three Years (2023–2025)	Applicable Initiative(s), Tracking ID(s)	Reference (section & page #)	Completion Date Listed in Approved WMP	Progress Summary (2025 Year-End Response)
Continue to deploy Enhanced Safety Settings (ESS), previously known as EFR settings.	GO-02	8.1.8 pp. 188-196	Ongoing activity	PacifiCorp continued to deploy ESS on capable devices throughout the company’s service territory. In 2025, ESS were implemented on 45 devices. The company also continued to upgrade current protective devices, where appropriate, to expand the network of ESS-capable devices and increase coverage on additional circuits and line segments.
Vegetation Management				
Create subject matter expert process and procedure for vegetation management database review four times a year.	VM-11	8.2.2 pp. 207-217	Q4 2025	In 2025, PacifiCorp continued preliminary work related to developing the future subject-matter-expert review approach. Finalizing the process requires the Mobile Data Management System (MDMS), which is still being configured for vegetation-management workflows. The review process will be completed once the necessary MDMS functionality is available.
Develop audits to provide understanding of the data collection process.	VM-11	8.2.5 pp. 225-226	Q4 2025	In 2025, PacifiCorp began initial scoping activities to inform the future audit approach for vegetation-management data. Completion of the formal audit process depends on MDMS data-collection and reporting capabilities, which are still being configured. The audit process will be finalized once MDMS implementation provides the needed functionality.
Create QA/QC process and procedure for benchmarking data in the database and inspections.	VM-11	8.2.5 pp. 225-226	Dec 2025	In 2025, PacifiCorp conducted scoping to inform the future QA/QC approach for vegetation-management data. Full development of the QA/QC process depends on Mobile Data Management System (MDMS) capabilities that will enable standardized data capture, reporting, and comparison across inspection types. Remaining work on the QA/QC process will be completed once the necessary MDMS functionality becomes available.

Objectives for Three Years (2023–2025)	Applicable Initiative(s), Tracking ID(s)	Reference (section & page #)	Completion Date Listed in Approved WMP	Progress Summary (2025 Year-End Response)
Develop training content for specialized equipment used for inspecting vegetation for conditions that increase wildfire risk.	VM-03 VM-11	8.2.7 pp. 228-230	Dec 2025	In 2025, PacifiCorp refined its training content and calibration protocols for laser rangefinders. Foresters now complete an initial tilt and horizontal compass calibration upon receiving a new device, followed by a recommended monthly horizontal compass calibration. Calibration activities are documented in weekly reports and recorded in the compliance tracker. Foresters also perform periodic validation checks, such as measuring a known height or distance, to ensure continued accuracy.
Situational Awareness and Forecasting				
Expand weather station network.	SA-01	8.3.2 p. 234	Dec 2025	In 2025, PacifiCorp installed eight weather stations and will continue expansion in 2026 and 2027 to enhance fire weather monitoring and situational awareness.
Emergency Preparedness				
Complete internal staff ECC (Emergency Coordination Center) and Department Operations Center (DOC) three-year training program.	EP-01	8.4.2 pp. 271-272	2025	PacifiCorp did not conduct training aligned with the California Office of Energy Infrastructure Safety (Energy Safety) curriculum standards in 2025. The Energy Safety-aligned ECC and DOC three-year training program was suspended in November 2024 under internal leadership direction, and no additional sessions were completed during the 2025 implementation period. PacifiCorp did continue delivering its separate internal ECC, DOC, and Executive Policy Group (EPG) trainings; however, these internal trainings are not part of the suspended Energy Safety-aligned curriculum.

Objectives for Three Years (2023–2025)	Applicable Initiative(s), Tracking ID(s)	Reference (section & page #)	Completion Date Listed in Approved WMP	Progress Summary (2025 Year-End Response)
Continue the use of tabletop exercises to prepare for emergencies and PSPS events.	EP-02	8.4.3 p. 288	Annually in Q1 and Q2	<p>On March 21, 2025, PacifiCorp held its Wildfire Advisory Board meeting with participation from public safety partners and regulatory representatives. The bi-annual meeting covers a variety of topics, including an overview of the company’s Emergency Response Plan, Public Safety Power Shutoff Playbook, Community Resource Center Playbook, and Access and Functional Needs Plan, along with details for the planned tabletop and functional exercises.</p> <p>On May 27, 2025, PacifiCorp conducted a tabletop exercise simulating a PSPS in Del Norte County, California. The three-hour exercise was held at the Crescent City fire hall, with an option for virtual attendance.</p> <p>On June 5, 2025, PacifiCorp conducted a functional exercise that included partners from its California service territory. The exercise was held virtually and focused on communications with the public and with public safety partners during a PSPS event.</p>
Community Outreach and Engagement				
Perform pre- and post-fire season customer survey.	CO-01	8.5.2 p. 317	Pre-Season Survey Once a year in Q2 Post-Season Survey Once a year in Q4	PacifiCorp completed its 2025 pre- and post-season wildfire mitigation customer surveys to assess preparedness, communication effectiveness, and program awareness.
Implement customer feedback from post-season wildfire mitigation surveys into future outreach efforts.	CO-01	8.5.2 p. 317	Oct 2025	In 2025, PacifiCorp enhanced its pre-season notifications, upgraded customer outage map and alerting tools, and developed educational materials for master meter customers.

Objectives for Three Years (2023–2025)	Applicable Initiative(s), Tracking ID(s)	Reference (section & page #)	Completion Date Listed in Approved WMP	Progress Summary (2025 Year-End Response)
Increase outreach to AFN populations.	CO-02	8.5.3 pp. 321-324	Oct 2025	<p>In 2025, PacifiCorp enhanced its accessibility resources by creating an Accessibility Programs webpage⁴; developing an Accessibility Programs Toolkit for partner organizations; developing a Master Meter and Tenant Preparedness Toolkit; and creating an Accessibility Programs flyer. All materials are in English and Spanish. At the end of the second quarter, PacifiCorp launched an AFN Self-Certification form on the Accessibility Programs webpage. Additionally, PacifiCorp website links were added to the state’s Joint IOU Prepare for Power Down website.</p> <p>In 2025, programs for AFN customers were highlighted in customer emails and bill messages. Tenant preparedness information was emailed to master meter/property manager/landlord customers and included information to share with their tenants. Additionally, customers with AFN who completed 2025 wildfire messaging surveys were mailed or emailed information about customer programs, based on their contact preference.</p>

⁴ PacifiCorp “Supporting accessibility needs” webpage: <https://www.pacificpower.net/outages-safety/access-and-functional-needs.html>.

Objectives for Three Years (2023–2025)	Applicable Initiative(s), Tracking ID(s)	Reference (section & page #)	Completion Date Listed in Approved WMP	Progress Summary (2025 Year-End Response)
Continue partnering with public safety partners in communities throughout California regarding wildfire safety and preparedness and PSPS.	CO-03	8.5.4 p. 324	Oct 2025	<p>On March 21, 2025, PacifiCorp held its Wildfire Advisory Board meeting, with participation from public safety partners and regulatory representatives. The bi-annual meeting covers a variety of topics, including an overview of the company’s Emergency Response Plan, Public Safety Power Shutoff Playbook, Community Resource Center Playbook, and Access and Functional Needs Plan, along with details for the planned tabletop and functional exercises.</p> <p>On May 27, 2025, PacifiCorp conducted a tabletop exercise simulating a PSPS in Del Norte County, California. The three-hour exercise was held at the Crescent City fire hall, with an option for virtual attendance.</p> <p>On June 5, 2025, PacifiCorp conducted a functional exercise that included partners from its California service territory; participation was virtual and focused on communications with the public and public safety partners during a PSPS event.</p> <p>PacifiCorp’s Emergency Management staff continue to attend regular meetings with public safety partners. The team also continues participating in community emergency preparedness events.</p>

Table 3: Ten-Year Objectives

Objectives for Ten Years (2026–2032)	Applicable Initiative(s), Tracking ID(s)	Reference (section & page #)	Completion Date Listed in Approved WMP	Progress Summary (2025 Year-End Response)
Grid Design, Operations, and Maintenance				
Improve Enhanced Safety Settings (ESS) capabilities.	GO-01	8.1.8 pp. 188-196	Dec 2032	PacifiCorp continued to deploy ESS on capable devices and implemented settings on 45 devices in 2025. The company also continued to upgrade protective devices to expand the network of ESS-capable equipment and increase coverage on additional lines where appropriate.
Complete line rebuild of all identified overhead line miles within the HFTD.	GH-01	8.1.2.1 pp. 155-157	Dec 2032	PacifiCorp continued to make progress on the line rebuild program for all identified overhead line miles within the HFTD and completed 123 miles of covered conductor installation in 2025.
Complete system automation upgrades on all identified relays.	GH-04	8.1.2.8 pp. 159-160	Dec 2026	PacifiCorp continued to make progress on the system automation upgrades on all identified relays. The company installed 23 system automation devices in 2025.
Vegetation Management				
Update vegetation database to have information about typical environmental conditions.	VM-01 VM-02 VM-03 VM-04 VM-06 VM-07	8.2.5 pp. 225-227	Dec 2032	PacifiCorp continued its transition to a Mobile Data Management System (MDMS) and advanced configuration for vegetation management use in 2025. The company also continued adding background data layers and enabling field data collection features for the inspection workforce.
Situational Awareness and Forecasting				
Continue expansion and refinement of weather station network.	SA-01	8.3.2 p. 234	End of 2032	PacifiCorp expanded its weather station network with eight new installations in 2025. Additional installations are planned for 2026 and 2027.

Objectives for Ten Years (2026–2032)	Applicable Initiative(s), Tracking ID(s)	Reference (section & page #)	Completion Date Listed in Approved WMP	Progress Summary (2025 Year-End Response)
Continue to leverage artificial intelligence and machine learning to create a more automated weather and risk forecasting system.	SA-05	8.3.5 pp. 250-261	End of 2032	PacifiCorp continued enhancing its operational Weather Research and Forecasting (WRF) model in 2025 by incorporating machine learning and artificial intelligence techniques. These updates support ongoing refinement and validation of forecasting outputs.
Emergency Preparedness				
Include hazard-specific annexes in the Emergency Response Plan for all service territories.	EP-01	8.4.2 pp. 271-272	Apr 2030	PacifiCorp continued developing and revising its Emergency Response Plan to incorporate hazard-specific annexes across all service territories and ensure compliance with California Public Utilities Commission (CPUC) requirements, including R.15-06-009, D. 21-05-019, and GO 166.
Continue collaboration and coordination with public safety partners.	EP-02	8.4.3 p. 288	Ongoing – to 2032	PacifiCorp continued conducting tabletop exercises, workshops, and functional exercises with public safety partners to support preparedness for potential PSPS events.
Automate collection and dissemination of key PSPS data.	EP-03	8.4.4 p. 298	Mar 2026	PacifiCorp continued to make improvements to the PSP Portal. Planned enhancements include ensuring compliance with CPUC web-based PSP Portal requirements, meeting interactive mapping expectations, and supporting PacifiCorp's efforts to prioritize restoration, evaluate backup power needs, and enhance communications and resource coordination before, during, and after PSPS events.
Community Outreach and Engagement				
Improve surveys based on 2023–2025 experience.	CO-01	8.5.2 p. 317	2028	PacifiCorp reviewed and updated the pre-season 2025 wildfire mitigation survey to better identify AFN customers and to assess customer understanding of wildfire de-energization outside of PSPS events.

Objectives for Ten Years (2026–2032)	Applicable Initiative(s), Tracking ID(s)	Reference (section & page #)	Completion Date Listed in Approved WMP	Progress Summary (2025 Year-End Response)
Increase availability of website wildfire and PSPS resources in additional languages.	CO-01	8.5.2 p. 317	Oct 2032	PacifiCorp continued improving its webpages and resources in 2025, while evaluating opportunities to expand content into additional languages and enhance overall accessibility.
Continue to increase outreach to AFN populations.	CO-02	8.5.3 pp. 321-324	Oct 2032	<p>In 2025, PacifiCorp enhanced its accessibility resources by creating an Accessibility Programs webpage⁵; developing an Accessibility Programs Toolkit for partner organizations; developing a Master Meter and Tenant Preparedness Toolkit; and creating an Accessibility Programs flyer. All materials are in English and Spanish. At the end of the second quarter, PacifiCorp launched an AFN Self-Certification form on the Accessibility Programs webpage. Additionally, PacifiCorp website links were added to the state’s Joint IOU Prepare for Power Down website.</p> <p>In 2025, programs for AFN customers were highlighted in customer emails and bill messages. Tenant preparedness information was emailed to master meter/property manager/landlord customers and included information to share with their tenants. Additionally, customers with AFN who completed 2025 wildfire messaging surveys were mailed or emailed information about customer programs, based on their contact preference.</p>
Continue to meet every two to three years with other utilities to discuss best practices and lessons learned.	CO-04	8.5.5 pp. 325-326	Oct 2032	PacifiCorp met with partner utilities in March and November 2025 to discuss learnings and best practices related to wildfire communications and customer outreach.

⁵ PacifiCorp “Supporting accessibility needs” webpage: <https://www.pacificpower.net/outages-safety/access-and-functional-needs.html>.

2.3 OBJECTIVES ASSESSMENT

The tables below summarize PacifiCorp's completion of the three-year and ten-year objectives listed in the tables from Section 8 of the 2023–2025 Base WMP.

Table 4: Completed Three-Year Objectives

Objectives for Three Years (2023–2025)	Applicable Initiative(s), Tracking ID(s)	Reference (section & page #)	Completion Date	Method of Verification Explanation	Completion Assessment
Grid Design, Operations, and Maintenance					
Continue execution of grid hardening plans.	GH-01 GH-02 GH-03 GH-04	8.1.2 pp. 154-161	WMP: Dec 2025 for 2023–2025 targets Actual: Q4 2025	Completed work orders/GIS data submission(s)	PacifiCorp completed 123 line miles of covered conductor installation, 2,544 distribution pole replacements, 250 transmission pole replacements, and 23 system automation device installations in 2025. Completion was verified using closed work orders and corresponding GIS records included in the California Quarterly Data Report (QDR).
Replace all expulsion fuses within the HFTD and HFRA.	GH-05	8.1.2.12 p. 161	WMP: Dec 2025 Actual: Q4 2025	Completed work orders/GIS data submission(s)	PacifiCorp completed 932 expulsion fuse replacements in the HFTD areas in 2025, exceeding the 500 replacements outlined in the 2025 WMP. The total includes both targeted fuse replacement locations and additional replacements completed concurrently with line-rebuild work under GH-01. Performing fuse replacements during line-rebuild construction supports operational efficiency and minimizes future system outages by consolidating work activities. Completion was verified using closed work orders and corresponding GIS records included in the company’s QDR.

Objectives for Three Years (2023–2025)	Applicable Initiative(s), Tracking ID(s)	Reference (section & page #)	Completion Date	Method of Verification Explanation	Completion Assessment
Continue planned inspection programs.	AI-01 AI-02 AI-03 AI-04 AI-05 AI-08	8.1.3 pp.162-170	WMP: Annually to Jan 2025 Actual: Q4 2025	Completed work orders/Facility Point Inspection (FPI) Data	PacifiCorp completed 12,032 transmission patrol inspections, 58,741 distribution patrol inspections, 509 transmission detail inspections, 18,556 distribution detail inspections, 1,246 transmission intrusive pole inspections, and 3,162 distribution intrusive pole inspections in 2025. Completion was verified using closed work orders and corresponding FPI records included in the company’s QDR.
Continue planned transmission and distribution wires maintenance.	MA-01	8.1.4 pp. 173-175	WMP: Annually to Jan 2025 Actual: Q4 2025	Completed work orders	PacifiCorp completed 130 planned transmission and distribution wire maintenance activities in 2025. Completion was verified using closed work orders and associated maintenance records.
Continue planned substation apparatus maintenance programs.	MA-01	8.1.4 pp. 173-175	WMP: Annually to Jan 2025 Actual: Q4 2025	Completed work orders	PacifiCorp completed 489 planned substation apparatus maintenance activities in 2025. Completion was verified using closed work orders and corresponding maintenance documentation.
Continue to deploy Enhanced Safety Settings (ESS), previously known as EFR settings.	GO-02	8.1.8 pp. 188-196	Ongoing Activity	ESS activation was verified using relay mode verification forms completed by field operations personnel and reviewed against system operator instructions.	PacifiCorp continued to deploy ESS on capable devices in the service territory and implemented settings on 45 devices in 2025. The company also continued to upgrade current protective devices to increase the network of ESS capable devices and coverage on additional lines as appropriate.

Objectives for Three Years (2023–2025)	Applicable Initiative(s), Tracking ID(s)	Reference (section & page #)	Completion Date	Method of Verification Explanation	Completion Assessment
Vegetation Management					
Create subject matter expert process and procedure for vegetation management database review four times a year.	VM-11	8.2.2 pp. 207-217	WMP: Q4 2025 Actual: N/A	Policies and procedures	<p>Explanation of incompleteness:</p> <p>In 2025, PacifiCorp continued preliminary work related to developing the future subject-matter-expert review approach. Finalizing the process requires the Mobile Data Management System (MDMS), which is still being configured for vegetation-management workflows. The review process will be completed once the necessary MDMS functionality is available.</p>
Develop audits to provide understanding of the data collection process.	VM-11	8.2.5 pp. 225-226	WMP: Q4 2025 Actual: N/A	Policies and procedures	<p>Explanation of incompleteness:</p> <p>In 2025, PacifiCorp began initial scoping activities to inform the future audit approach for vegetation-management data. Completion of the formal audit process depends on MDMS data-collection and reporting capabilities, which are still being configured. The audit process will be finalized once MDMS implementation provides the needed functionality.</p>

Objectives for Three Years (2023–2025)	Applicable Initiative(s), Tracking ID(s)	Reference (section & page #)	Completion Date	Method of Verification Explanation	Completion Assessment
<p>Create procedure for exchanging best practices with other California electrical corporations and implementing information into training and quality assurance.</p>	<p>VM-11</p>	<p>8.2.5 pp. 225-226</p>	<p>WMP: Dec 2025 Actual: Q3 2025</p>	<p>Internal program documentation and meeting records</p>	<p>PacifiCorp completed the process for exchanging vegetation management best practices with other California electrical corporations. In 2024, PacifiCorp and Pacific Gas and Electric Company (PG&E) formalized a recurring collaboration process that establishes quarterly meetings, identifies discussion topics, and documents meeting outcomes to support information sharing and evaluation of potential procedural improvements. Completion was verified using internal collaboration documents and records of meetings held to implement this process.</p>
<p>Create QA/QC process and procedure for benchmarking data in the database and inspections.</p>	<p>VM-11</p>	<p>8.2.5 pp. 225-226</p>	<p>WMP: Dec 2025 Actual: N/A</p>	<p>Policies and procedures</p>	<p>Explanation of incompleteness: In 2025, PacifiCorp conducted scoping to inform the future QA/QC approach for vegetation-management data. Full development of the QA/QC process depends on Mobile Data Management System (MDMS) capabilities that will enable standardized data capture, reporting, and comparison across inspection types. Remaining work on the QA/QC process will be completed once the necessary MDMS functionality becomes available.</p>

Objectives for Three Years (2023–2025)	Applicable Initiative(s), Tracking ID(s)	Reference (section & page #)	Completion Date	Method of Verification Explanation	Completion Assessment
Develop training content for specialized equipment used for inspecting vegetation for conditions that increase wildfire risk.	VM-03 VM-11	8.2.7 pp. 228-230	WMP: Dec 2025 Actual: Q1 2026	User manual in foresters' weekly reports and compliance tracker	PacifiCorp finalized training content and calibration protocols for laser rangefinders, including initial tilt and compass calibration and monthly horizontal-compass calibration. Completion was verified using training/procedure materials, and corresponding documentation completed per the user manual in foresters' weekly reports and the compliance tracker.
Situational Awareness and Forecasting					
Expand weather station network.	SA-01	8.3.2 p. 234	WMP: Dec 2025 Actual: Q3 2025	Completed work orders/GIS data submission(s)	PacifiCorp installed eight weather stations in 2025. Completion was verified using closed work orders and corresponding GIS records included in the QDR.
Emergency Preparedness					
Complete internal staff ECC (Emergency Coordination Center) and Department Operations Center (DOC) three-year training program.	EP-01	8.4.2 pp. 271-272	WMP: Dec 2025 Actual: N/A	Training records and program documentation	PacifiCorp did not conduct training aligned with the California Office of Energy Infrastructure Safety (OEIS) curriculum standards in 2025. The OEIS-aligned ECC and DOC three-year training program was suspended in November 2024 under internal leadership direction, and no additional sessions were completed during the 2025 implementation period. Other internal ECC, DOC, and Executive Policy Group process-focused trainings are separate from the OEIS-aligned program and were not part of the suspended curriculum.

Objectives for Three Years (2023–2025)	Applicable Initiative(s), Tracking ID(s)	Reference (section & page #)	Completion Date	Method of Verification Explanation	Completion Assessment
Continue the use of tabletop exercises to prepare for emergencies and PSPS events.	EP-02	8.4.3 p. 288	WMP: Annually in Q1/Q2 Actual: Q2 2025	This information is provided with the required pre-season report for California.	PacifiCorp completed the 2025 exercise series: a Wildfire Advisory Board workshop on March 21, a tabletop exercise on May 27, and a functional exercise on June 5. Completion was verified using materials included with the required California pre-season report and corresponding exercise documentation.
Community Outreach and Engagement					
Perform pre- and post-fire season customer survey.	CO-01	8.5.2 p. 317	WMP: Pre-season survey once a year in Q2 Post-season survey once a year in Q4 Actual: Q4 2025	Complete surveys and provide results	PacifiCorp completed both required 2025 wildfire mitigation customer surveys. The pre-season survey was completed in the second quarter, and the post-season survey was completed in the fourth quarter. Completion was verified using survey reports and corresponding program records.
Implement customer feedback from post season wildfire mitigation surveys into future outreach efforts.	CO-01	8.5.2 p. 317	WMP: Oct 2025 Actual: Q2 2025	This information is provided with the required pre-season report for California.	PacifiCorp implemented customer-driven improvements in 2025, including enhanced pre-season notifications, updates to the outage map and alerts, and new materials for master meter customers. Completion was verified using updated materials and corresponding program records.

Objectives for Three Years (2023–2025)	Applicable Initiative(s), Tracking ID(s)	Reference (section & page #)	Completion Date	Method of Verification Explanation	Completion Assessment
Increase outreach to AFN populations.	CO-02	8.5.3 pp. 321-324	WMP: Oct 2025 Actual: Q2 2025	Outreach materials	Pacific Power continues to enhance its website, including updates to the Accessibility Programs webpage, the Accessibility Programs flyer, the tenant preparedness toolkit, the external partner toolkit designed to amplify customer awareness, and customer emails and bill messages.
Continue partnering with public safety partners in communities throughout California regarding wildfire safety and preparedness and PSPS.	CO-03	8.5.4 p. 324	WMP: Oct 2025 Actual: Q2 2025	Program records and meeting documentation	PacifiCorp continued partnering with public safety agencies throughout 2025 by participating in workshops, PSPS preparedness exercises, and recurring coordination meetings. The company engaged local and state emergency management partners through utility agency briefings, seasonal readiness sessions, and community preparedness events to support wildfire safety and PSPS planning efforts. Emergency Management staff also participated in standing coordination forums and outreach activities across the California service territory.

Table 5: Completed Ten-Year Objectives

Objectives for Ten Years (2026–2032)	Applicable Initiative(s), Tracking ID(s)	Reference (section & page #)	Completion Date	Method of Verification Explanation	Completion Assessment
All ten-year objectives listed in the WMP have target completion dates after 2025.					

2.4 TARGETS ASSESSMENT

The table below summarizes PacifiCorp's completion of initiative targets listed in the tables from Section 8 of the 2023–2025 Base WMP.

Table 6: Completed Targets

WMP Initiative	Target & Unit	Completion Date	Verification Method (2025 Year-End Response)	Completion Assessment (2025 Year-End Response)	QA/QC Assessment	WMP Expected Risk Reduction ⁶	Actual Risk Reduction Achieved ⁷	Explanation and Actions Taken ⁸
Grid Design, Operations, and Maintenance								
GH-01 Line Rebuild – Covered Conductor Installation	120 line miles	Target: Year-end 2025 Actual: Q4 2025	Completed work orders/ GIS data submission(s)	PacifiCorp completed 123 line miles of covered conductor installation in 2025. The company reviewed completed work orders and verified the work against GIS data submitted through the QDR to confirm completion of the initiative.	N/A	N/A	N/A	N/A
GH-02 Distribution Pole Replacement	2,400 poles	Target: Year-end 2025 Actual: Q4 2025	Completed work orders/ GIS data submission(s)	PacifiCorp completed 2,544 distribution pole replacements in 2025. Completed work orders were reviewed and verified against GIS data submitted through the QDR to confirm completion of the initiative.	N/A	N/A	N/A	N/A

⁶ This item is marked N/A for all initiatives because at the time the WMP was filed the company had not yet completed its risk quantification methodology, which is a necessary precursor to estimating the risk reduction expected for mitigations. For information on the company’s progress in quantifying risk, see PacifiCorp’s update on the risk assessment initiative “Continue refinement of risk-spend efficiency (RSE) calculation methodology and calculate RSE for grid hardening initiatives” in Section 2.1.1 of this document.

⁷ This item is marked N/A for all initiatives because at the time the WMP was filed the company had not yet completed its risk quantification methodology, which is a necessary precursor to estimating the risk reduction achieved for mitigations. For information on the company’s progress in quantifying risk, see PacifiCorp’s update on the risk assessment initiative “Continue refinement of risk-spend efficiency (RSE) calculation methodology and calculate RSE for grid hardening initiatives” in Section 2.1.1 of this document.

⁸ This item is marked N/A for all initiatives because the company does not have values for “Actual Risk Reduction Achieved” on which to comment.

WMP Initiative	Target & Unit	Completion Date	Verification Method (2025 Year-End Response)	Completion Assessment (2025 Year-End Response)	QA/QC Assessment	WMP Expected Risk Reduction ⁶	Actual Risk Reduction Achieved ⁷	Explanation and Actions Taken ⁸
GH-03 Transmission Pole Replacement	240 poles	Target: Year-end 2025 Actual: Q4 2025	Completed work orders/ GIS data submission(s)	PacifiCorp completed 250 transmission pole replacements in 2025. The company reviewed associated work orders and verified the work against GIS data submitted through the QDR to confirm completion of the initiative.	N/A	N/A	N/A	N/A
GH-04 Installation of System Automation Equipment	10 devices	Target: Year-end 2025 Actual: Q4 2025	Completed work orders/ GIS data submission(s)	PacifiCorp completed installation of 23 system automation devices in 2025, including 13 units carried over from 2023 and 2024. Completed work orders were reviewed and verified against GIS data submitted through the QDR to confirm completion of the initiative.	N/A	N/A	N/A	N/A
GH-05 Expulsion Fuse Replacement	500 fuse locations	Target: Year-end 2025 Actual: Q4 2025	Completed work orders/ GIS data submission(s)	PacifiCorp completed 932 expulsion fuse replacements in 2025. Completed work orders were reviewed and verified against GIS data submitted through the QDR to confirm completion of the initiative. The higher-than-target total reflects additional fuse replacements completed under the GH-01 initiative.	N/A	N/A	N/A	N/A
AI-01 Transmission Patrol Inspections	12,030 inspections	Target: Year-end 2025 Actual: Q4 2025	Completed work orders/ FPI data	PacifiCorp completed 12,032 transmission patrol inspections. The company used the FPI database to confirm completions and cross-checked results against completed work orders. The target was exceeded due to a transition to an annual patrol inspection interval.	N/A	N/A	N/A	N/A

WMP Initiative	Target & Unit	Completion Date	Verification Method (2025 Year-End Response)	Completion Assessment (2025 Year-End Response)	QA/QC Assessment	WMP Expected Risk Reduction ⁶	Actual Risk Reduction Achieved ⁷	Explanation and Actions Taken ⁸
AI-02 Distribution Patrol Inspections	50,485 inspections	Target: Year-end 2025 Actual: Q4 2025	Completed work orders/ FPI data	PacifiCorp completed 58,741 distribution patrol inspections. The company used the FPI database to confirm completions and reviewed results against completed work orders. The target was exceeded due to a transition to an annual patrol inspection interval.	N/A	N/A	N/A	N/A
AI-03 Transmission Detail Inspections	540 inspections	Target: Year-end 2025 Actual: Q4 2025	Completed work orders/ FPI data	<p>PacifiCorp completed 509 transmission detail inspections in 2025. The remaining locations were identified as retired facility points or misidentified assets that did not meet the criteria for transmission detail inspection.</p> <p><u>QA/QC Clarification</u></p> <p>Although the WMP included a 5% QA/QC sampling value for transmission detail inspections, QA/QC sampling is not performed for this initiative because transmission detail inspections are conducted by qualified transmission patrol personnel whose expertise provides high confidence in the inspection results. Consistent with established practice, no QA/QC sampling was performed on transmission detail inspections in 2025.</p>	Target: 5% Achieved: 0%	N/A	N/A	N/A

WMP Initiative	Target & Unit	Completion Date	Verification Method (2025 Year-End Response)	Completion Assessment (2025 Year-End Response)	QA/QC Assessment	WMP Expected Risk Reduction ⁶	Actual Risk Reduction Achieved ⁷	Explanation and Actions Taken ⁸
AI-04 Distribution Detail Inspections	10,135 inspections	Target: Year-end 2025 Actual: Q4 2025	Completed work orders/ FPI data	PacifiCorp completed 18,556 distribution detail inspections. The company used the FPI database to confirm completions and reviewed results against completed work orders. The target was exceeded due to a pilot inspection program for yearly Tier 3 structures.	Target: 507 (5%) Achieved: 1,564 (8%)	N/A	N/A	N/A
AI-05 Transmission Intrusive Pole Inspections	1,257 inspections	Target: Year-end 2025 Actual: Q4 2025	Completed work orders/ FPI data	<p>PacifiCorp completed 1,246 transmission intrusive pole inspections. The company used the FPI database to confirm completions and reviewed results against completed work orders.</p> <p>Explanation of partial incomplection:</p> <p>The remaining 11 inspection locations were determined to be either retired facility points or incorrectly labeled in the system and did not meet the criteria for inspection as part of this initiative (e.g., one location was incorrectly noted as overhead when it was underground).</p> <p>PacifiCorp considers this initiative complete for 2025 and does not have any corrective actions for the slight variance.</p>	Target: 63 (5%) Achieved: 66 (5%)	N/A	N/A	N/A

WMP Initiative	Target & Unit	Completion Date	Verification Method (2025 Year-End Response)	Completion Assessment (2025 Year-End Response)	QA/QC Assessment	WMP Expected Risk Reduction ⁶	Actual Risk Reduction Achieved ⁷	Explanation and Actions Taken ⁸
AI-06 Distribution Intrusive Pole Inspections	3,173 inspections	Target: Year-end 2025 Actual: Q4 2025	Completed work orders/ FPI data	<p>PacifiCorp completed 3,162 distribution intrusive pole inspections. The company used the FPI database to confirm completions and cross-checked results against completed work orders.</p> <p>Explanation of partial incomplection: The remaining 11 inspection locations were determined to be either retired facility points or incorrectly labeled in the system and did not meet the criteria for inspection as part of this initiative (e.g., one location was incorrectly noted as overhead when it was underground).</p> <p>PacifiCorp considers this initiative complete for 2025 and does not have any corrective actions for the slight variance.</p>	Target: 159 (5%) Achieved: 257 (8%)	N/A	N/A	N/A

WMP Initiative	Target & Unit	Completion Date	Verification Method (2025 Year-End Response)	Completion Assessment (2025 Year-End Response)	QA/QC Assessment	WMP Expected Risk Reduction ⁶	Actual Risk Reduction Achieved ⁷	Explanation and Actions Taken ⁸
AI-07 Enhanced (Infrared) Inspections in Transmission Lines	700 line miles	Target: Year-end 2025 Actual: Q4 2025	Completed work orders/ SAP data submission(s)	<p>PacifiCorp completed 15,656 enhanced (infrared) inspections on transmission lines, equating to approximately 692 line miles.</p> <p>Explanation of partial incompleteness:</p> <p>Three transmission lines totaling approximately eight line miles were decommissioned in 2024 and could not be inspected as part of the 2025 program. The company used the FPI database to confirm completions and reviewed results against completed work orders.</p> <p>PacifiCorp considers this initiative complete for 2025 and does not have any corrective actions for the slight variance.</p>	N/A	N/A	N/A	N/A
AI-08 Enhanced (Infrared) Inspections in Distribution Lines	1,300 line miles	Target: Year-end 2025 Actual: Q3 2025	Completed work orders/ SAP data submission(s)	<p>PacifiCorp completed 32,286 enhanced (infrared) inspections on distribution lines, equating to approximately 1,300 line miles. The company used the FPI database to confirm completions and reviewed results against completed work orders.</p>	N/A	N/A	N/A	N/A

WMP Initiative	Target & Unit	Completion Date	Verification Method (2025 Year-End Response)	Completion Assessment (2025 Year-End Response)	QA/QC Assessment	WMP Expected Risk Reduction ⁶	Actual Risk Reduction Achieved ⁷	Explanation and Actions Taken ⁸
AI-11 Substation Inspections (Minor, Major, Security, and Infrared)	451 inspections	Target: Year-end 2025 Actual: Q4 2025	Completed work orders/SAP data submission(s)	PacifiCorp completed 450 of the 451 planned substation inspections. The inspection plan was adjusted due to Western Electricity Coordinating Council path changes, resulting in one fewer required inspection. PacifiCorp considers this initiative complete for 2025 and does not have any corrective actions for the variance.	N/A	N/A	N/A	N/A
AI-12 Quality Assurance Quality Control	756 inspections	Target: Year-end 2025 Actual: Q4 2025	Completed work orders/SAP data submission(s)	PacifiCorp completed 1,887 quality assurance and quality control (QA/QC) inspections. The target was exceeded due to a pilot inspection program involving Tier 3 structures.	Target: 755 (5%) Achieved: 1,887 (100%)	N/A	N/A	N/A
Vegetation Management								
VM-01 Detailed Inspection – Distribution	826 circuit miles inspected	Target: Year-end 2025 Actual: Q3 2025	Inspection records, billing, project closeout documentation, mileage documentation and tracking, and field verification	PacifiCorp completed 100% of the targeted miles for vegetation management detailed inspections. Associated pruning and removal activities were also completed and were field-audited and confirmed.	N/A	N/A	N/A	N/A

WMP Initiative	Target & Unit	Completion Date	Verification Method (2025 Year-End Response)	Completion Assessment (2025 Year-End Response)	QA/QC Assessment	WMP Expected Risk Reduction ⁶	Actual Risk Reduction Achieved ⁷	Explanation and Actions Taken ⁸
VM-02 Detailed Inspection – Transmission	270 line miles inspected	Target: Year-end 2025 Actual: Q2 2025	Inspection records, billing, project closeout documentation, mileage documentation and tracking, and field verification	PacifiCorp completed 100% of the targeted miles for vegetation management detailed inspections. Associated pruning and removal activities were also completed, and sample field audits were conducted.	N/A	N/A	N/A	N/A
VM-03 Patrol Inspection – Distribution	1,182 circuit miles inspected	Target: Year-end 2025 Actual: Q3 2025	Inspection records, billing, project closeout documentation, mileage documentation and tracking, and field verification	PacifiCorp completed 100% of the targeted miles for vegetation management patrol inspections. Associated pruning and removal activities were also completed and were field-audited and confirmed.	Target: 100% Achieved: 100%	N/A	N/A	N/A
VM-04 Patrol Inspection – Transmission	417 line miles inspected	Target: Year-end 2025 Actual: Q2 2025	Inspection records, billing, project closeout documentation, mileage documentation and tracking, and field verification	PacifiCorp completed 100% of the targeted miles for vegetation management patrol inspections. Associated pruning and removal activities were also completed and were field-audited and confirmed.	Target: 100% Achieved: 100%	N/A	N/A	N/A

WMP Initiative	Target & Unit	Completion Date	Verification Method (2025 Year-End Response)	Completion Assessment (2025 Year-End Response)	QA/QC Assessment	WMP Expected Risk Reduction ⁶	Actual Risk Reduction Achieved ⁷	Explanation and Actions Taken ⁸
VM-05 Fuels Management – Pole Clearing beyond PRC 4292	3,126 poles brushed in local responsibility areas located in HFTD	Target: Year-end 2025 Actual: Q2 2025	Annual post-work audit by internal staff	PacifiCorp completed 100% of pole clearing activities planned for 2025, including exempt poles identified during inspection. Targeted post-audits of pole clearing activities were also completed.	N/A	N/A	N/A	N/A
VM-11 QA/QC – Post-Audits Distribution (Patrol)	1,182 line miles	Target: Year-end 2025 Actual: Q4 2025	Mileage documentation and tracking	PacifiCorp completed 100% of the targeted miles for post-audit inspections.	N/A	N/A	N/A	N/A
VM-11 QA/QC – Post-Audits Transmission (Patrol)	417 line miles	Target: Year-end 2025 Actual: Q3 2025	Mileage documentation and tracking	PacifiCorp completed 100% of the targeted miles for post-audit inspections.	N/A	N/A	N/A	N/A
Situational Awareness and Forecasting								
SA-01 Weather Stations	6 weather stations	Target: Year-end 2025 Actual: Q3 2025	Completed work orders/ GIS data submission(s)	PacifiCorp reviewed Q3 2025 work order closures to confirm installation of the eight weather stations and verified the installations against GIS data submitted in the company’s 2025 Q3 QDR.	N/A	N/A	N/A	N/A

WMP Initiative	Target & Unit	Completion Date	Verification Method (2025 Year-End Response)	Completion Assessment (2025 Year-End Response)	QA/QC Assessment	WMP Expected Risk Reduction ⁶	Actual Risk Reduction Achieved ⁷	Explanation and Actions Taken ⁸
Emergency Preparedness								
EP-02 External Collaboration and Coordination	1 functional exercise 1 tabletop exercise 1 workshop	Target: Year-end 2025 Actual: Q2 2025	This information is provided with the required pre-season report for California.	<p>On March 21, 2025, PacifiCorp held its bi-annual Wildfire Advisory Board meeting, with participation from public safety partners and regulatory representatives. Topics included the company’s Emergency Response Plan, PSPS Playbook, Community Resource Center Playbook, Access and Functional Needs Plan, and planned tabletop and functional exercises.</p> <p>On May 27, 2025, PacifiCorp conducted a tabletop exercise simulating a PSPS in Del Norte County, California. The three-hour exercise was held at the Crescent City fire hall, with an option for virtual attendance.</p> <p>On June 5, 2025, PacifiCorp conducted a functional exercise with partners from its California service territory; participation was virtual and addressed communications with the public and public safety partners during a PSPS event.</p> <p>PacifiCorp’s Emergency Management staff continues to attend regular meetings with public safety partners and participate in community emergency preparedness events.</p>	N/A	N/A	N/A	N/A

WMP Initiative	Target & Unit	Completion Date	Verification Method (2025 Year-End Response)	Completion Assessment (2025 Year-End Response)	QA/QC Assessment	WMP Expected Risk Reduction ⁶	Actual Risk Reduction Achieved ⁷	Explanation and Actions Taken ⁸
Community Outreach and Engagement								
CO-01 AFN Resources on the Website	1 additional language for the medical certificate	Target: Year-end 2025 Actual: Q4 2025	Review of the website and backend logs	PacifiCorp reviewed the website and associated backend logs and confirmed that the medical certificate application is available in Spanish.	N/A	N/A	N/A	N/A
CO-01 Pre- and Post-Fire Season Survey	60% or more of the sample survey are aware of wildfire safety communications	Target: Year-end 2025 Actual: Q4 2025	Complete surveys and provide results	PacifiCorp's 2025 pre-season customer survey found that 67% of respondents were aware of wildfire-related communications. The 2025 post-season survey found that 79% of respondents were aware of wildfire-related communications.	N/A	N/A	N/A	N/A
Risk Assessment and Methodology								
RA-01 Risk and Risk Component Calculation	PSPS and wildfire risk trade-off transparency	Target: Year-end 2025 ⁹ Actual: Q4 2025	Inclusion of PSPS components in risk assessment and planning model, including PSPS risk scores for top 5% wildfire risk.	PacifiCorp's risk assessment and mitigation planning model now includes a PSPS component that calculates a monetized risk impact for PSPS events.	NA	N/A	N/A	N/A

⁹ Target was described in PacifiCorp's 2026-2028 WMP. See [PC_CA_2026-2028_Base_WMP_R2.pdf](#), pages 111-112.

WMP Initiative	Target & Unit	Completion Date	Verification Method (2025 Year-End Response)	Completion Assessment (2025 Year-End Response)	QA/QC Assessment	WMP Expected Risk Reduction ⁶	Actual Risk Reduction Achieved ⁷	Explanation and Actions Taken ⁸
RA-01 Risk and Risk Component Calculation	Monetization of risk events for use in RSE calculations	Target: Year-end 2025 ¹⁰ Actual: Q3 2025	Risk is expressed in USD in the risk assessment and mitigation planning model.	PacifiCorp's risk assessment and mitigation planning model now provides monetized risk scores for circuit segments based on the momentary zone of protection. These monetized risk scores flow into a risk-spend efficiency (RSE) calculation for line rebuild mitigations for each circuit segment.	NA	N/A	N/A	N/A
RA-01 Risk and Risk Component Calculation	Creation of PEDS risk model	Target: Year-end 2025 ¹¹ Actual: Q4 2025	Inclusion of PEDS component in risk assessment and planning model, including PEDS risk scores for top 5% wildfire risk	PacifiCorp's risk assessment and mitigation planning model now includes a Protection Equipment Device Settings (PEDS) component that calculates a monetized risk impact for PEDS events.	NA	N/A	N/A	N/A

¹⁰ Target was described in PacifiCorp's 2026-2028 WMP. *Id.*, pages 111-113.

¹¹ Target was described in PacifiCorp's 2026-2028 WMP. *Id.*, pages 111 and 113.

WMP Initiative	Target & Unit	Completion Date	Verification Method (2025 Year-End Response)	Completion Assessment (2025 Year-End Response)	QA/QC Assessment	WMP Expected Risk Reduction ⁶	Actual Risk Reduction Achieved ⁷	Explanation and Actions Taken ⁸
RA-01 Risk and Risk Component Calculation	Create reproducible model development environment using Python, Azure DevOps, and Azure Cloud resources	Target: Year-end 2025 ¹² Actual: Q4 2025	PacifiCorp can provide a snapshot of repository structure.	PacifiCorp has implemented a reproducible model development environment where repositories are managed in Azure DevOps and data is accessed through Azure Cloud resources.	This initiative supports QA/QC for modeling by establishing organizational and model development best practices.	N/A	N/A	N/A

¹² Target was described in PacifiCorp's 2026-2028 WMP. *Id.*, pages 111 and 113-114.

WMP Initiative	Target & Unit	Completion Date	Verification Method (2025 Year-End Response)	Completion Assessment (2025 Year-End Response)	QA/QC Assessment	WMP Expected Risk Reduction ⁶	Actual Risk Reduction Achieved ⁷	Explanation and Actions Taken ⁸
RA-01 Risk and Risk Component Calculation	Implement a standardized model taxonomy to track release versions	Target: Year-end 2025 ¹³ Actual: Q4 2025	Can provide the most recent code version with explanations of the function of framework elements.	PacifiCorp implemented a standardized model taxonomy effective with the December 2025 model release.	This initiative supports QA/QC for modeling by fostering organizational and model development best practices. It will help track model progression and identify when and how errors are introduced so they can be remedied.	N/A	N/A	N/A
RA-01 Risk and Risk Component Calculation	Dynamic grid hardening efficacy rates	Target: Year-end 2025 ¹⁴ Actual: Q4 2025	Can provide documentation explaining how the covered conductor efficacy is adjusted based on tree risk data.	PacifiCorp implemented variable efficacy rates for covered conductor, parameterized by tree-risk data, in 2025.	N/A	N/A	N/A	N/A

¹³ Target was described in PacifiCorp's 2026-2028 WMP. *Id.*, pages 111 and 114-115.

¹⁴ Target was described in PacifiCorp's 2026-2028 WMP. *Id.*, pages 111 and 115-116.

3. PETITIONS TO AMEND WMP

PacifiCorp did not submit any petitions to amend its WMP in 2025.

4. PLANNED AND ACTUAL EXPENDITURES

The table below lists the planned budget and actual expenditure for each initiative identified in the WMP, including an explanation for variances greater than 10%.

Table 7: WMP Initiative Expenditures

Initiative ID	Initiative	2025 Planned Budget (\$ thousands)	2025 Actual Budget (\$ thousands)	2025 % Variance	Variance Explanation
AI-01	Transmission Patrol inspections	\$ 87	\$ 55	-37%	PacifiCorp's 2025 actual expenditure for AI-01 (Transmission Patrol Inspections) was lower than the planned budget because the cost to complete the inspections in 2025 was less than originally forecast in the 2023–2025 Base WMP. When Transmission Detail Inspections (AI-03) were completed before the scheduled Transmission Patrol Inspections (AI-01) for the same assets, the Patrol Inspections (AI-01) were not performed, avoiding duplicative work and therefore lowering the overall spend on AI-01.
AI-02	Distribution Patrol Inspections	\$ 268	\$ 443	65%	PacifiCorp's 2025 actual expenditure for AI-02 (Distribution Patrol Inspections) exceeded the planned budget because the number of required patrol inspections in 2025 was significantly higher than assumed in the 2023–2025 Base WMP. Following a change in the safety assurance frequency to an annual inspection requirement, the total number of overhead distribution safety patrols increased by approximately 8,000 units compared to the original WMP target. This higher inspection volume resulted in actual expenditures above the planned level.
AI-03	Transmission Detail Inspections	\$ 20	\$ 48	138%	PacifiCorp's 2025 actual expenditure for AI-03 (Transmission Detail Inspections) exceeded the planned budget because the cost per detailed inspection was higher than assumed in the 2025 WMP Update. Although the number of structures requiring detailed inspection in 2025 was slightly lower than forecast, the unit cost to perform the inspections was greater than anticipated, resulting in total expenditures above the planned level.

Initiative ID	Initiative	2025 Planned Budget (\$ thousands)	2025 Actual Budget (\$ thousands)	2025 % Variance	Variance Explanation
AI-04	Distribution Detail Inspections	\$ 221	\$ 578	162%	PacifiCorp's 2025 actual expenditure for AI-04 (Distribution Detail Inspections) exceeded the planned budget because the number of required inspections in 2025 was significantly higher than assumed in the 2023–2025 Base WMP. Due to the Tier 2/3 pilot program transitioning from a five-year cycle to a two-year cycle for detail inspections, starting in 2025, the total number of inspections increased by approximately 8,000 above the planned target. This higher inspection volume resulted in actual expenditures above the planned level.
AI-05	Transmission Intrusive Pole Inspections	\$ 64	\$ 131	105%	PacifiCorp's 2025 actual expenditure for AI-05 (Transmission Intrusive Pole Inspections) exceeded the planned budget because more transmission poles required intrusive inspection in 2025 than assumed in the 2025 WMP Update. Intrusive inspection volumes vary annually based on the pole inspection cycle and the number of structures scheduled for testing in a given year. The higher inspection volume in 2025 resulted in actual expenditures above the planned level.
AI-06	Distribution Intrusive Pole Inspections	\$ 175	\$ 135	-23%	PacifiCorp's 2025 actual expenditure for AI-06 (Distribution Intrusive Pole Inspections) was lower than the planned budget because fewer distribution poles required intrusive inspection in 2025 than assumed in the 2025 WMP Update. Intrusive inspection volumes vary annually based on the inspection cycle and the number of poles scheduled for testing in a given year. The lower inspection volume resulted in actual expenditures below the planned level.
AI-07	Enhanced (Infrared) Inspections in Transmission Lines	\$ 90	\$ 87	-3%	Variance is within 10% of the planned budget.

Initiative ID	Initiative	2025 Planned Budget (\$ thousands)	2025 Actual Budget (\$ thousands)	2025 % Variance	Variance Explanation
AI-08	Enhanced (Infrared) Inspections in Distribution Lines	\$ 0	\$ 218	N/A	PacifiCorp's 2025 actual expenditure for AI-08 (Enhanced (Infrared) Inspections in Distribution Lines) exceeded the planned budget because no funding was originally included for 2025 at the time the 2023–2025 Base WMP was filed. The pilot program for enhanced infrared inspections was scoped only for 2023 and 2024, and, as noted in Table 8-4 of the WMP, any 2025 activity was contingent on the results of the pilot. Following the 2024 inspection season, the pilot was approved to continue into 2025, including expansion into the HFTD. As a result, inspection work proceeded in 2025 even though no dollars had been budgeted for this initiative, leading to actual expenditures above the planned level.
AI-11	Substation Inspections	\$ 180	\$ 175	-3%	Variance is within 10% of the planned budget.
AI-12	Quality Assurance and Quality Control	\$ 36	\$ 66	83%	PacifiCorp's 2025 actual expenditure for AI-12 (Quality Assurance and Quality Control) exceeded the planned budget because the total number of inspections subject to QA/QC review in 2025 was higher than anticipated in the 2023–2025 Base WMP. QA/QC activity levels are directly driven by the volume of transmission and distribution inspections completed each year, and increased inspection counts resulted in higher QA/QC workload and associated costs, leading to actual expenditures above the planned level.
CO-01	Public Outreach and Education Awareness Program	\$ 110	\$ 107	-3%	Variance is within 10% of the planned budget.

Initiative ID	Initiative	2025 Planned Budget (\$ thousands)	2025 Actual Budget (\$ thousands)	2025 % Variance	Variance Explanation
EP-01	Emergency Preparedness Plan	\$ 320	\$ 472	47%	PacifiCorp's 2025 actual expenditure for EP-01 (Emergency Preparedness Plan) exceeded the planned budget due to the expansion of emergency-related work groups supporting wildfire and PSPS preparedness activities. In 2025, PacifiCorp increased staffing and resources across the Wildfire Intelligence Center, Meteorology, Emergency Management, and Emergency Response functions to meet operational and regulatory needs. These organizational changes increased the labor and program costs attributed to this initiative beyond what was assumed in the 2025 WMP Update.
EP-02	External Collaboration and Coordination	\$ 10	\$ 1.3	-87%	PacifiCorp's 2025 actual expenditure for EP-02 (External Collaboration and Coordination) was lower than the planned budget because funding requirements for this initiative continued to decline in 2025. As coordination processes and stakeholder engagement activities became more streamlined, fewer resources were needed than assumed in the 2025 WMP Update, resulting in actual expenditures below the planned level.
GH-01	Line Rebuild – Covered Conductor Installation	\$120,000	\$182,582	52%	PacifiCorp's 2025 expenditure for GH-01 (Line Rebuild – Covered Conductor Installation) exceeded the budget estimated in the 2025 WMP Update primarily because the cost per mile of installing covered conductor was higher than anticipated due to upgraded agreements with design and construction contractors. Some incremental contract changes included field engineering support, post-construction inspections, and extended warranty. Additionally, PacifiCorp completed additional design scoping in 2025 to have designs and permits in place for 2026 work.

Initiative ID	Initiative	2025 Planned Budget (\$ thousands)	2025 Actual Budget (\$ thousands)	2025 % Variance	Variance Explanation
GH-04	Installation of System Automation Equipment	\$ 2,500	\$ 7,158	186%	PacifiCorp's 2025 expenditure for GH-04 (Installation of System Automation Equipment) exceeded the budget estimated in the 2023–2025 Base WMP for several reasons. The estimated budget was based on the installation of 10 units; however, in accordance with Energy Safety guidance, PacifiCorp completed 23 units, including 13 units not completed in prior years. This resulted in an increase in the overall amount of work completed and associated costs for this initiative. Furthermore, the cost per unit was higher than anticipated due to the engagement of a construction project management company to oversee system hardening projects, as well as higher-than-expected costs associated with extending communications to field devices.
GH-05	Expulsion Fuse Replacement	\$ 1,000	\$ 1,455	46%	PacifiCorp's 2025 expenditure for GH-05 (Expulsion Fuse Replacement) exceeded the budget estimated in the 2025 WMP Update primarily because the budget was based on 500 fuse replacements, and 932 were completed. GH-05 includes both targeted fuse replacements and fuse replacements performed concurrently with line rebuild work under GH-01. In 2025, the company completed 181 targeted fuse replacements and an additional 751 replacements concurrently with line rebuild work. As outlined in PacifiCorp's 2025 WMP Update, the company prioritizes the replacement of expulsion fuses in coordination with line rebuild projects whenever practical. Performing fuse replacements during line rebuild activities is an intentional strategy to maximize operational efficiency and minimize overall system costs for customers.
GO-02	Grid Response Procedures and Notifications (Grid Ops): Patrols	\$ 600	\$ 152	-75%	PacifiCorp's 2025 expenditure for GO-02 (Grid Response Procedures and Notifications (Grid Ops): Patrols) was less than the planned 2025 budget due to a change to PacifiCorp's Wildfire Encroachment System Operations Procedure SOP-203, which resulted in fewer post outage patrols in 2025. This resulted in lower operations and maintenance and less expenditure than planned.

Initiative ID	Initiative	2025 Planned Budget (\$ thousands)	2025 Actual Budget (\$ thousands)	2025 % Variance	Variance Explanation
MA-01	Equipment Maintenance and Repair	\$ 410	\$ 399	-3%	Variance is within 10% of the planned budget.
PS-01	Protocols on PSPS	\$ 750	\$ 0	-100%	PacifiCorp's 2025 actual expenditure for PS-01 (Protocols on PSPS) was lower than the planned budget because no PSPS events occurred in 2025. In the absence of PSPS events, no related operational activities or associated costs were incurred, resulting in actual expenditures below the planned level.
RA-01	Risk and Risk Components Calculation	\$ 155	\$ 345	122%	PacifiCorp's 2025 expenditure for RA-01 (Risk and Risk Components Calculation) exceeded the planned budget because the Asset Risk Data Science team added four additional full-time employees to support increasingly complex risk-modeling requirements. This staffing expansion increased the operations and maintenance hours and associated costs allocated to this initiative, resulting in actual expenditures above the planned level.
RA-03	Other Key Metrics	\$ 0	\$ 0	0%	Variance is within 10% of the planned budget.
RA-04	Enterprise System for Risk Assessment	\$ 73	\$ 701	860%	PacifiCorp's 2025 expenditure for RA-04 (Enterprise System for Risk Assessment) exceeded the planned budget because the original estimate assumed that software costs would be expensed over multiple years rather than capitalized. When the costs were instead capitalized in 2025, a larger portion of the total cost was recognized within the year, resulting in actual expenditures above the planned level.

Initiative ID	Initiative	2025 Planned Budget (\$ thousands)	2025 Actual Budget (\$ thousands)	2025 % Variance	Variance Explanation
SA-01	Environmental Monitoring Systems	\$ 120	\$ 141	18%	PacifiCorp's 2025 actual expenditure for SA-01 (Environmental Monitoring Systems) exceeded the planned budget because the company installed more environmental monitoring stations than originally projected in the 2023–2025 Base WMP. As reflected in the WMP, PacifiCorp adjusts annual installation quantities based on operational needs and situational awareness requirements, and in 2025, additional stations were installed to support wildfire risk monitoring beyond the initial forecast. These added installations resulted in higher costs than the planned budget assumed.
SA-02	Grid Monitoring Systems	\$ 0	\$ 34	N/A	PacifiCorp's 2025 actual expenditure for SA-02 (Grid Monitoring Systems) exceeded the planned budget because the initiative continued to incur communication costs associated with existing distribution fault anticipation (DFA) devices through 2025. Although support-service costs were no longer included in this initiative beginning in the 2023–2025 Base WMP, cellular communication charges remained necessary to operate the devices until their service contracts expired. These ongoing communication costs resulted in actual expenditures above the planned budget, which assumed no spending for 2025.
SA-03	Smoke and Air Quality Sensors	\$ 0	\$ 0	0%	Variance is within 10% of the planned budget.
SA-04	Ignition Detection Systems	\$ 80	\$ 80	0%	Variance is within 10% of the planned budget.

Initiative ID	Initiative	2025 Planned Budget (\$ thousands)	2025 Actual Budget (\$ thousands)	2025 % Variance	Variance Explanation
SA-05	Weather Forecasting	\$ 670	\$ 195	-71%	PacifiCorp's 2025 actual expenditure for SA-05 (Weather Forecasting) was lower than the planned budget due to unanticipated Department of Energy (DOE) grant reimbursements and changes in PacifiCorp's contract with Technosylva. DOE reimbursements applied to more activities than initially expected, reducing net expenditure for the initiative. In addition, Technosylva's updated contract structure resulted in certain forecasting and modeling costs being invoiced differently than reflected in the planning forecast, contributing to lower actual spending within SA-05.
SA-06	Fire Potential Index	\$ 96	\$ 996	938%	PacifiCorp's 2025 actual expenditure for SA-06 (Fire Potential Index) exceeded the planned budget due to changes in PacifiCorp's contract with Technosylva and because the weather modeling and forecasting enhancements completed in 2025 were greater in scope than assumed in the Base 2023–2025 WMP. The updated Technosylva contract structure resulted in higher costs than originally anticipated. In addition, PacifiCorp expanded its high-performance computing clusters from two to five units to support both an extension of the Weather Research and Forecasting (WRF) deterministic model from 3.5 to 5 days and implementation of the WRF ensemble system. Building the ensemble model required additional computing capacity to generate nine high-resolution forecasts, which improve the detection of low-probability, high-impact events such as PSPS conditions. These enhancements provide greater advanced situational awareness capabilities than anticipated based on the original 2025 planned spend.

Initiative ID	Initiative	2025 Planned Budget (\$ thousands)	2025 Actual Budget (\$ thousands)	2025 % Variance	Variance Explanation
VM-01	Detailed Inspection – Distribution	\$ 310	\$ 731	136%	PacifiCorp’s 2025 actual expenditure for VM-01 (Detailed Inspection – Distribution) exceeded the planned budget primarily due to an increase in required inspection volume following the establishment of the HFRA. As documented in the 2025 WMP Update, PacifiCorp implemented the FireSight risk model and identified 728 miles of new HFRA territory, which must be inspected to the same standards as CPUC Tier 2 and Tier 3 HFTD areas. This operational change resulted in higher inspection volumes than assumed in the 2023–2025 Base WMP. As a result, the actual 2025 expenditures exceeded the planned budget.
VM-02	Detailed Inspection – Transmission	\$ 87	\$ 112	29%	PacifiCorp’s 2025 actual expenditure for VM-02 (Detailed Inspection – Transmission) exceeded the planned budget due to expanded inspection requirements resulting from the establishment of the HFRA. As documented in the 2025 WMP Update, PacifiCorp’s implementation of the FireSight risk model identified new HFRA mileage that must be inspected to the same standards as CPUC Tier 2 and Tier 3 HFTD areas, increasing the total inspection scope beyond what was assumed in the 2023–2025 Base WMP.
VM-03	Patrol Inspection – Distribution	\$ 285	\$ 469	65%	PacifiCorp’s 2025 actual expenditure for VM-03 (Patrol Inspection – Distribution) exceeded the planned budget due to an increase in required inspection mileage following the establishment of the HFRA. The implementation of the FireSight risk model identified new HFRA mileage that must be patrolled to the same standards as CPUC Tier 2 and Tier 3 HFTD areas, increasing required patrol coverage beyond the assumptions in the 2023–2025 Base WMP. Additionally, inspection mileage exceeded the forecast, increasing from 922 planned miles to 1,183 miles, driving higher unit costs, further contributing to the variance. As a result, actual 2025 expenditures were higher than planned.

Initiative ID	Initiative	2025 Planned Budget (\$ thousands)	2025 Actual Budget (\$ thousands)	2025 % Variance	Variance Explanation
VM-04	Patrol Inspection – Transmission	\$ 102	\$ 84	-18%	<p>PacifiCorp’s 2025 actual expenditure for VM-04 (Patrol Inspection – Transmission) differed from the planned budget due to changes in inspection mileage requirements following the establishment of the HFRA. As reflected in the 2025 WMP Update, the implementation of the FireSight risk model identified additional HFRA transmission mileage that must be patrolled annually using the same standards as CPUC Tier 2 and Tier 3 HFTD areas, expanding the scope of required work beyond the assumptions in the 2023–2025 Base WMP.</p> <p>In practice, inspection volume increased from an expected 329-line miles to 417-line miles, reflecting an increase in required coverage. While the cost per mile decreased due to efficiencies in execution, the total inspection requirement exceeded the originally planned volumes, contributing to the variance from budget assumptions.</p>
VM-05	Pole Clearing	\$ 530	\$ 731	38%	<p>PacifiCorp’s 2025 actual expenditure for VM-05 (Pole Clearing) exceeded the planned budget due to increased clearing requirements following the establishment of the HFRA. As described in the 2025 WMP Update, the FireSight risk model identified substantial new HFRA acreage that must be managed to the same standards as CPUC Tier 2 and Tier 3 HFTD areas, expanding the total number of poles requiring clearing relative to the assumptions used in the 2023–2025 Base WMP.</p> <p>This expansion required pole clearing across a greater number of miles than originally forecast. Actual 2025 workload increased from an expected 3,014 miles to 3,192 miles, and the cost-pe-mile also increased, contributing to higher-than-planned expenditures.</p>
VM-06	Clearance – Distribution	\$ 12,770	\$ 13,467	5%	Variance is within 10% of the planned budget.
VM-07	Clearance – Transmission	\$ 2,520	\$ 2,724	8%	Variance is within 10% of the planned budget.

Initiative ID	Initiative	2025 Planned Budget (\$ thousands)	2025 Actual Budget (\$ thousands)	2025 % Variance	Variance Explanation
VM-08	Fall-in Mitigation	\$ 40	\$ 0	-100%	PacifiCorp's 2025 actual expenditure for VM-08 (Fall-in Mitigation) was lower than planned because the underlying fieldwork associated with the Enhanced Overhang Reduction pilot was discontinued prior to the start of the 2025 implementation period. Although funding was carried forward into 2025 in case additional fieldwork verification was required, no field activities were needed and the remaining evaluation consisted only of desktop review and internal discussions. As a result, no fieldwork occurred and no expenditures were incurred under this initiative in 2025.
VM-11	Quality Assurance/ Quality Control	\$ 165	\$ 223	35%	PacifiCorp's 2025 actual expenditure for VM-11 (Quality Assurance/ Quality Control) exceeded the planned budget due to an increase in required QA/QC activities associated with expanded inspection scope in the HFRA. Following implementation of the FireSight risk model, the 2025 WMP Update established new HFRA territory that must be inspected and audited to the same standards as CPUC Tier 2 and Tier 3 HFTD areas, which increased the volume of vegetation inspections subject to QA/QC review. As a result, higher audit volumes and more extensive verification requirements led to increased costs beyond what was originally forecast for 2025.
WP-01	Wildfire Mitigation Strategy Development	\$ 845	\$ 980	16%	PacifiCorp's 2025 actual expenditure for WP-01 (Wildfire Mitigation Strategy Development) exceeded the planned budget due to organizational changes in wildfire mitigation planning. During 2025, PacifiCorp reorganized staff supporting wildfire mitigation strategy development and adjusted how planning-related costs were allocated across the company's service territories. These changes resulted in a greater share of wildfire mitigation planning costs attributed to this initiative than was assumed in the 2025 WMP Update used to establish the planned budget.

Initiative ID	Initiative	2025 Planned Budget (\$ thousands)	2025 Actual Budget (\$ thousands)	2025 % Variance	Variance Explanation
WP-02	Identifying and Evaluating Mitigation Initiatives	\$ 280	\$ 18	-94%	PacifiCorp's 2025 actual expenditure for WP-02 (Identifying and Evaluating Mitigation Initiatives) was lower than the planned budget because spending on the drone pilot program in 2025 was less than anticipated in the 2025 WMP Update. As a result, actual costs attributed to this initiative were below the planned level.

5. CONCLUSION

PacifiCorp's WMP efforts continue to evolve, through both internal learning and additional guidance received from the Office of Energy Infrastructure Safety, the California Public Utilities Commission, other California utilities, stakeholders, and PacifiCorp's customers. The company has made great progress in implementing the objectives for 2025 and continues to evaluate and refine programs and measures to ensure it is taking actions that will reduce wildfire risk without imposing unnecessary costs and burdens on customers.