State of California – A Natural Resources Agency
Gavin Newsom, Governor

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Tony Marino, Ph.D., Acting Director

April 15, 2026

Curt Mansfield
Senior Vice President, Power Delivery
PacifiCorp *dba* Pacific Power
825 NE Multnomah St, Ste 2000
Portland, Oregon 97232

Subject: Enclosed is the Office of Energy Infrastructure Safety's Decision on the PacifiCorp 2026-2028 Base Wildfire Mitigation Plan

Mr. Mansfield:

Enclosed is the Decision of Office of Energy Infrastructure Safety approving the PacifiCorp's 2026-2028 Base Wildfire Mitigation Plan (2026-2028 Base WMP).

On February 26, 2028, Energy Safety published a draft of this Decision for public review and comment.

Opening comments on the draft Decision were due on March 18, 2026, and reply comments were due on March 28, 2026.

Energy Safety considered the comments received in its final evaluation. A summary of these comments and any corresponding changes can be found in Appendix D. In addition to these changes, Energy Safety made non-substantive changes to correct typographical errors in the text.

If PacifiCorp seeks to align its approved 2026-2028 Base WMP with a California Public Utilities Commission decision in a general rate case (GRC) proceeding, it must submit a petition to amend its 2026-2028 Base WMP within 45 days of the CPUC's Decision. See Energy Safety's WMP Guidelines[1] for further instructions and criteria for submitting a petition to amend.

Sincerely,

/s/ Tony Marino

Tony Marino
Acting Director
Office of Energy Infrastructure Safety

OFFICE OF ENERGY INFRASTRUCTURE SAFETY

DECISION

PACIFICORP

2026-2028 BASE WILDFIRE MITIGATION PLAN

April 15, 2026

1. Executive Summary

The PacifiCorp dba Pacific Power (PacifiCorp) 2026-2028 Base Wildfire Mitigation Plan (WMP) is approved.

The Office of Energy Infrastructure Safety (Energy Safety) works to ensure electrical corporations construct, maintain, and operate electrical lines and equipment in a manner that will minimize the risk of catastrophic wildfire posed by those electrical lines and equipment. Pursuant to Public Utilities Code section 8386.3(a), this Decision serves as Energy Safety's assessment and approval of the PacifiCorp 2026-2028 Base WMP R2, dated March 18, 2026, which is inclusive of all changes resulting from the Revision Notice and previously submitted errata. Energy Safety's Decision incorporates comments from members of the public.

PacifiCorp made an important advancement in updating its risk model by implementing the first version of its planning model. This planning model enables PacifiCorp the ability to identify the assets at-risk from wildfires, assess the cost efficiency of its grid hardening mitigation activities, and to map its High Fire Risk Areas. Implementing and updating its planning model is a positive step toward PacifiCorp producing a comprehensive risk model of its system to allow it to identify the high-risk portions of its system and apply appropriate mitigations.

Additionally, PacifiCorp is running power simulation models of de-energized transmission lines to learn of potential induction risk and applied mitigations for mutually coupled transmission lines. PacifiCorp is the first electrical corporation in California that has taken the initiative to run power simulation models on de-energized transmission lines. Energy Safety has required all investor-owned utilities to identify the risk posed by de-energized and abandoned transmission lines and provide a comprehensive mitigation strategy. For its vegetation management efforts, PacifiCorp established remediation timelines based on risk that will enable it to prioritize work by location. PacifiCorp's progress will likely reduce wildfire risk by ensuring the timely remediation of risky vegetation.

However, PacifiCorp has areas where it needs to improve. At the time of its Base WMP filing, PacifiCorp was still developing its calculation of overall utility risk, including calculating Public Safety Power Shutoff and protective equipment and device settings risks to enable it to determine overall utility risk. While PacifiCorp has since completed its ability to calculate additional outage program risks, it has yet to implement and demonstrate how overall utility risk impacts its WMP and still has additional risk modeling improvements planned. With these additional improvements and further implementation, PacifiCorp will be able to better prioritize mitigations based on a more well-developed understanding of risk.

Further, PacifiCorp must overcome its past construction management challenges for its grid hardening efforts for greater risk reduction to be realized. Additionally, PacifiCorp must

complete implementation of its enhanced safety settings to maximize the potential of the program.

Lastly, PacifiCorp's vegetation Priority Level 2 remediation timeline is longer than its peers. Areas for continued improvement have been identified in this Decision for these and other issues where PacifiCorp must make progress in future WMPs.

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2. Introduction

Energy Safety approves the PacifiCorp 2026-2028 Base Wildfire Mitigation Plan (2026-2028 Base WMP), version R2, which includes revisions resulting from the Revision Notice and previously submitted errata.

PacifiCorp submitted its 2026-2028 Base WMP R2 on March 18, 2026. This Base WMP covers a three-year period from 2026 through the end of 2028 (the WMP cycle). PacifiCorp prepared its Base WMP in accordance with the requirements set forth in the Energy Safety WMP Guidelines.

2.1 2026-2028 Base WMP Submission and Publication Summary

This section provides a list of the 2026-2028 Base WMP submissions and publications by PacifiCorp and Energy Safety. Information regarding the submission types can be found in the Energy Safety WMP Guidelines.

- 6/6/2025 - PacifiCorp submitted its 2026-2028 Base WMP Pre-Submission.
- 6/20/2025 - Energy Safety issued a Pre-Submission Check Sufficiency Determination for the PacifiCorp 2026-2028 Base WMP Pre-Submission.
- 7/11/2025 - PacifiCorp submitted its responses to the 2026-2028 Maturity Survey.
- 7/11/2025 - PacifiCorp submitted its 2026-2028 Base WMP R0.
- 7/29/2025 - PacifiCorp submitted a Substantive Errata to its 2026-2028 Base WMP R0.
- 8/22/2025 – PacifiCorp submitted a non-substantive Errata to its 2026-2028 Base WMP R0.
- 10/13/2025 - Energy Safety issued a Revision Notice for PacifiCorp's 2026-2028 Base WMP R0.
- 11/26/2025 - PacifiCorp submitted its Revision Notice Response.
- 11/26/2025 - PacifiCorp submitted its 2026-2028 Base WMP R1.
- 02/26/2026 – Energy Safety issued its Draft Decision on the PacifiCorp 2026-2028 Base WMP R1.
- 03/03/2026 – Energy Safety issued an Errata Notice on the PacifiCorp 2026-2028 Base WMP R1.
- 03/18/2026 – PacifiCorp submitted its Response to the 2026-2028 Base WMP Non-Substantive Errata R2.
- 03/18/2026 - PacifiCorp submitted its 2026-2028 Base WMP R2.

2.2 Consultation with California Department of Forestry and Fire Protection

The Office of the State Fire Marshal is part of the California Department of Forestry and Fire Protection (CAL FIRE). Public Utilities Code section 8386.3(a) requires Energy Safety to consult with the Office of the State Fire Marshal in reviewing electrical corporation WMPs. The Office of the State Fire Marshal provided meaningful consultation and input on the evaluation, but this Decision is solely an action of Energy Safety and not the Office of the State Fire Marshal or CAL FIRE.

2.3 Public Comment

In rendering its decision, Energy Safety considered comments on the PacifiCorp 2026-2028 Base WMP submitted pursuant to Public Utilities Code section 8386.3(d).

2.3.1 Comments on the PacifiCorp 2026-2028 Base WMP

Energy Safety invited members of the public to provide comments on the PacifiCorp 2026-2028 Base WMP. The following individuals and organizations submitted comments:

- The Green Power Institute

Energy Safety considered all comments prior to issuing this Decision. Appendix D contains a summary of the comments Energy Safety concurred with and incorporated into this Decision.

2.3.2 Comments on the PacifiCorp Revision Notice Response and Revised 2026-2028 Base WMP

Energy Safety invited members of the public to provide comments on the PacifiCorp Revision Notice Response and revised 2026-2028 Base WMP (published for comment on October 13, 2025). No members of the public provided comments on the PacifiCorp Revision Notice Response and Revised 2026-2028 Base WMP.

2.3.3 Comments on the Energy Safety Draft Decision on Pacificorp 2026-2028 Base WMP

Energy Safety invited members of the public to provide comments on the draft Energy Safety Decision on the PacifiCorp 2026-2028 Base WMP (published for comment on February 26, 2026)[1] The following individuals and organizations submitted comments:

- PacifiCorp

[1] Draft Decision on PacifiCorp 2026-2028 Base WMP.

Energy Safety considered all comments prior to issuing this Decision. Appendix D contains a summary of comments Energy Safety concurred with and incorporated into this Decision.

2.4 Environmental Compliance

An approved WMP shall not be construed as relieving any electrical corporation from complying with all applicable local, state, or federal environmental requirements. A list of selected examples of state environmental requirements is available on Energy Safety's website for reference.[2] Electrical corporations should reach out to the primary agency responsible for an environmental requirement for any additional information.

2.5 Area for Continued Improvement Reporting

Reporting of required progress for areas for continued improvement in this Decision will be due by the next Base WMP. The timing and period covered by the next Base WMP have yet to be decided. The schedule for upcoming WMP submissions is pending development due to ongoing implementation of 2025 California Legislative Service Chapter 119 (Senate Bill 254, Becker) ("SB 254").

SB 254, which became law on September 19, 2025, impacts WMP cycles, submission schedules, and technical requirements, and imposes new and amended statutory requirements on the existing WMP process. Energy Safety is working to implement the changes from SB 254 and expects to hold at least one public workshop to gather feedback from electrical corporations and stakeholders on potential changes. Energy Safety plans to issue a WMP submission schedule and to revise its WMP Guidelines to reflect the changes and new requirements.

[2] Examples of State Environmental Requirements.

3. Introductory Sections of the WMP

PacifiCorp provided the required information for the following sections in accordance with Chapter III of the WMP Guidelines:

- Section 1: Executive Summary
- Section 2: Responsible Persons
- Section 3: Overview of the WMP (Primary Goal, Plan Objectives, Prioritized List of Wildfire Risks and Risk Drivers, Performance Metrics, Projected Expenditures, and Climate Change)
- Section 4: Overview of the Service Territory (Service Territory, Catastrophic Wildfire History, and Frequently Deenergized Circuits)

4. Projected Expenditures

PacifiCorp provided the required information[3] regarding projected expenditures in accordance with Chapter III, Section 3.6 of the WMP Guidelines. PacifiCorp provided additional information regarding projected expenditures in accordance with the Energy Safety Data Guidelines;[4] a summary of this information is presented below.

Table 4-1 represents the total 2026-2028 Base WMP projected expenditure per mitigation category for Bear Valley Electric Service, Liberty Utilities, and PacifiCorp. Table 4-2 represents the breakdown of those total WMP expenditures projected to be spent in the High Fire Threat District (HFTD) and non-HFTD.

Figure 4-1 represents what PacifiCorp projects spending during the WMP cycle in its Grid Design, Operations, and Maintenance mitigation category. Figure 4-2 represents PacifiCorp's projected expenditures for vegetation management and inspections. Figure 4-3 represents PacifiCorp's projected expenditures for emergency preparedness, collaboration and public awareness.

Table 4-1.
PacifiCorp Projected Expenditure Comparison[5]

WMP Initiative Category	Bear Valley Electric Service		Liberty Utilities		PacifiCorp	
	Total Territory	% of Grand Total	Total Territory	% of Grand Total	Total Territory	% of Grand Total
Wildfire Mitigation Strategy	$108.0K	0.13%	N/A	N/A	$3.6M	0.65%
Vegetation Management and Inspections	$11.2M	13.94%	$34.7M	31.65%	$56.3M	10.15%
Situational Awareness and Forecasting	$1.6M	1.97%	$1.5M	1.40%	$8.0M	1.44%
Risk Methodology and	$216.0K	0.27%	$2.7M	2.46%	$742.0K	0.13%
Grid Design, Operations, and Maintenance	$66.5M	82.88%	$66.3M	60.41%	$483.8M	87.22%
Enterprise Systems	$247.0K	0.31%	$2.6M	2.38%	$725.0K	0.13%
Emergency Preparedness, Collaboration and Public Awareness	$398.0K	0.50%	$1.9M	1.71%	$1.5M	0.28%
Grand Total	**$80.3M**	**100.00%**	**$109.8M**	**100.00%**	**$554.7M**	**100.00%**

[3] Energy Safety's WMP evaluation and decision on a WMP is not an approval of, or agreement with, costs listed in the WMP.

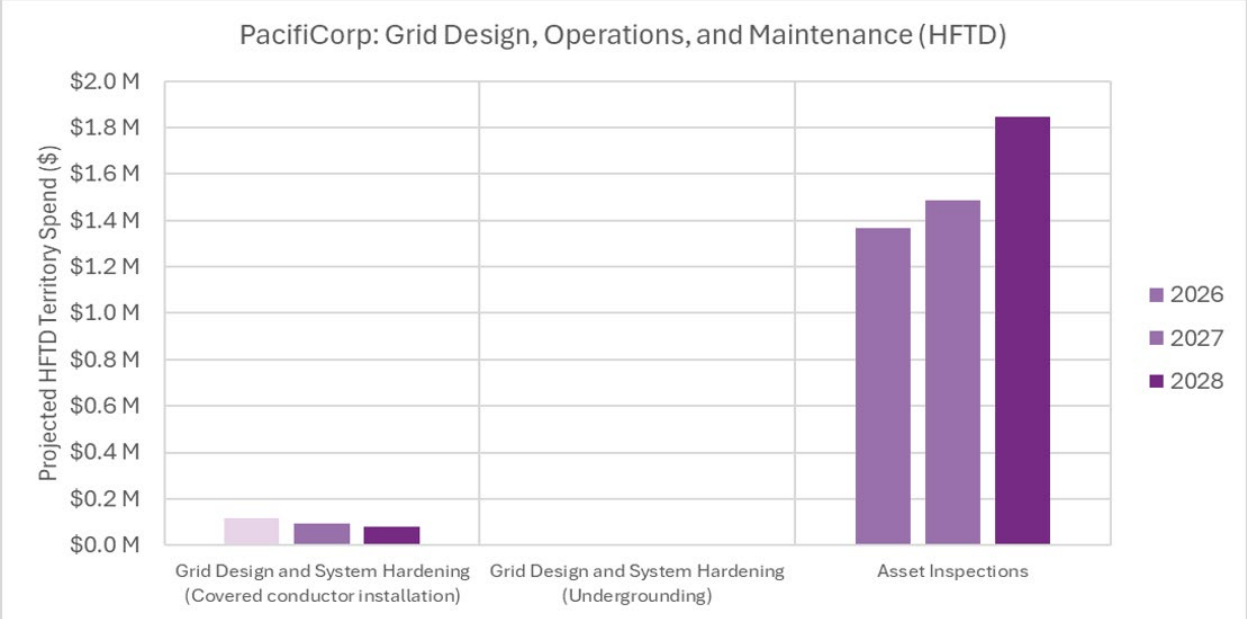
[4] Data Guidelines v4.01, 165-167.

[5] BVES WMP Data submission, Liberty WMP Data submission, PacifiCorp WMP Data submission R2.

Table 4-2.
PacifiCorp Projected Expenditure Comparison HFTD vs Non-HFTD[6]

WMP Initiative Category	Bear Valley Electric Service			Liberty Utilities			PacifiCorp		
	HFTD	Non-HFTD	% Spend in HFTD	HFTD	Non-HFTD	% Spend in HFTD	HFTD	Non-HFTD	% Spend in HFTD
Wildfire Mitigation Strategy	$108.0K	$0.0	100.00%	N/A	N/A	N/A	$1.5M	$2.1M	42%
Vegetation Management and Inspections	$11.2M	$0.0	100.00%	$34.7M	$0.0	100.00%	$37.9M	$18.4M	67%
Situational Awareness and Forecasting	$1.6M	$0.0	100.00%	$1.5M	$0.0	100.00%	$4.6M	$3.4M	57%
Risk Methodology and	$216.0K	$0.0	100.00%	$2.7M	$0.0	100.00%	$312.0K	$430.0K	42%
Grid Design, Operations, and Maintenance	$66.5M	$0.0	100.00%	$66.3M	$0.0	100.00%	$295.8M	$188.0M	61%
Enterprise Systems	$247.0K	$0.0	100.00%	$2.6M	$0.0	100.00%	$303.9K	$421.1K	42%
Emergency Preparedness, Collaboration and Public Awareness	$398.0K	$0.0	100.00%	$1.9M	$0.0	100.00%	$675.2K	$874.2K	44%
Grand Total	**$80.3M**	**$0**	**100.00%**	**$109.8M**	**$0**	**100.00%**	**$341.0M**	**$213.7M**	**61.48%**

Figure 4-1.
PacifiCorp Grid Design, Operations, and Maintenance (HFTD)



[6] PacifiCorp did not disaggregate its projected expenditure in HFTD versus non-HFTD in its initial data submission, 2026-WMP_R0. After responding to Energy Safety Data Request 11, PacifiCorp provided its disaggregated projected expenditures in its 2026-WMP_R2 data submission, as depicted in Table 4-2.

Figure 4-2.
PacifiCorp Vegetation Management and Inspection (HFTD)

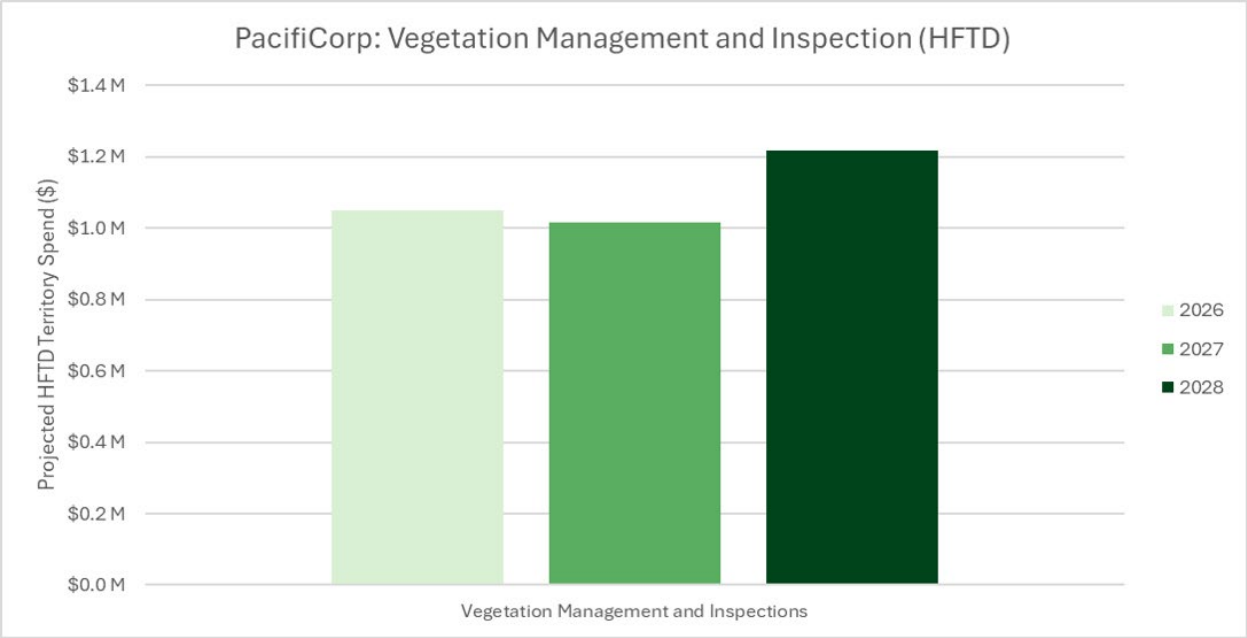
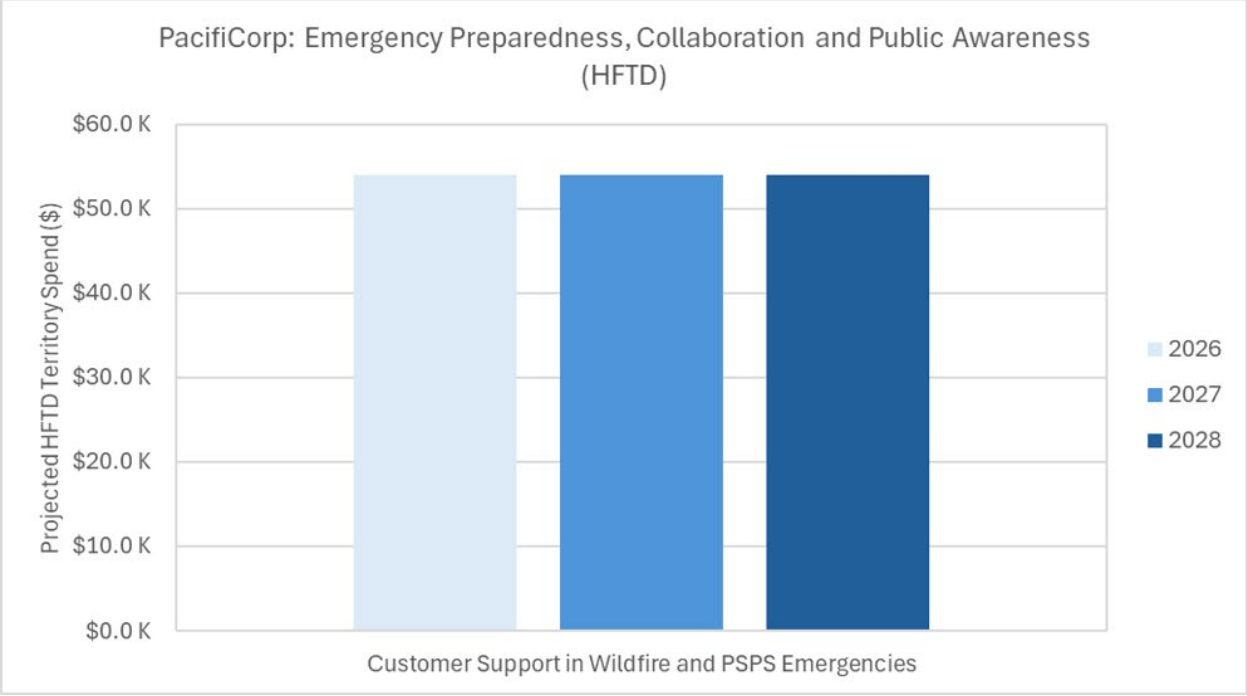


Figure 4-3.
PacifiCorp Emergency Preparedness, Collaboration and Public Awareness



5. Risk Methodology and Assessment

Chapter III, Section 5 of the WMP Guidelines requires the electrical corporation to provide an overview of its risk methodology, key input data and assumptions, risk analysis, and risk presentation (i.e., the results of its assessment).[7] The PacifiCorp 2026-2028 Base WMP met the requirements of the WMP Guidelines for this section.

5.1 Discussion

This section discusses Energy Safety's evaluation of the risk methodology and assessment section of the PacifiCorp 2026-2028 Base WMP.

5.1.1 Methodology

While PacifiCorp has made continued progress in implementing its risk model, it must continue to improve by developing a more comprehensive analysis of where risk exists on its system and a more detailed, thorough documentation of its risk models.

PacifiCorp updated its risk model by implementing "the first version of a planning model" for use in its 2026-2028 Base WMP.[8] PacifiCorp uses its planning model to identify assets most at-risk from wildfires (i.e., wildfire risk), to assess the cost efficiency of its grid hardening mitigation activities, and to map its High Fire Risk Areas (HFRA).[9, 10]

Implementing and updating its planning model is a positive step toward PacifiCorp being able to produce a comprehensive risk model of its system. The planning model helps PacifiCorp identify the riskiest portions of its system and apply appropriate mitigations to address that risk.

While the core of PacifiCorp's planning model for understanding wildfire risk is complete, at the time of the WMP Base filing, PacifiCorp was still developing its calculation of overall utility risk, including calculating Public Safety Power Shutoff (PSPS) and protective equipment and device settings (PEDS) consequence risks.[11] Overall utility risk captures the summation of both wildfire risks and outage program risks to provide the total risk across an electrical

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[7] Pub. Util. Code §§ 8386(c)(3), (8), (12)-(13), (17)-(18).

[8] PacifiCorp 2025 WMP Update R2, pages 4, 52.

[9] PacifiCorp 2026-2028 Base WMP R2, pages 52-53.

[10] PacifiCorp 2026-2028 Base WMP R2, page 53.

[11] PacifiCorp 2026-2028 Base WMP R2, page 53.

corporation's system, and is necessary to enable the prioritization of mitigations based on all of these risks.[12] In its 2026-2028 Base WMP, PacifiCorp stated that it planned on completing these additional portions of its planning by the end of 2025.[13] As of January 2026, PacifiCorp completed quantification of PSPS and PEDS risk, and stated that both are now a part of its overall risk calculation.[14] However, PacifiCorp must still provide substantiating documentation and integrate the completed overall risk calculation and scores into its overall WMP strategy.

As PacifiCorp continues to implement its risk models and develop additional components, it is crucial that PacifiCorp also develop detailed documentation. The risk model documentation PacifiCorp provided in its Base WMP did not offer detailed technical documentation of its probability of failure models, consequence models, weather models, and fuel models, given that the risk model is still in development. As required in the WMP Guidelines,[15] PacifiCorp must be able to provide this detailed documentation because such documentation is essential for demonstrating, recording, and evaluating aspects of the risk model such as modeling components, assumptions, and validations. PacifiCorp must include detailed technical documentation for all models and data sets as required in area for continued improvement PC-26B-05: Development of Substantive Model Documentation in Section 5.4.5.

While PacifiCorp has a plan in place to improve its risk model, PacifiCorp must continue to demonstrate continued risk model maturity. PacifiCorp must use its risk model to comprehensively analyze where risk exists on its system to understand where the highest risk exists to help prioritize mitigations. See Section 5.4.1, PC-26B-01: Continued Risk Model Development for details on what is required for PacifiCorp to provide as it continues its process of developing and updating components of its risk model.

5.1.2 Risk Analysis Framework

While PacifiCorp stated that it can model risk using 24-hour simulations, PacifiCorp did not indicate when, if at all, and where it will incorporate 24-hour simulations into its risk modeling.

PacifiCorp's current wildfire risk calculations are produced by calculating wind risk and fuel/terrain risk.[16] PacifiCorp uses its wind risk score to identify risk that can be mitigated

[12] PacifiCorp 2026-2028 Base WMP R2, page 59.

[13] PacifiCorp 2026-2028 Base WMP R2, page 111.

[14] PacifiCorp response to Data Request 21, Question 1.

[15] WMP Guidelines, Appendix B, page B-6.

[16] PacifiCorp 2026-2028 Base WMP R2, page 56.

operationally.[17] PacifiCorp uses its fuel/terrain risk score to identify risk that cannot be mitigated operationally and must be targeted for system hardening.[18] To develop its wind and fuel/terrain risk scores, PacifiCorp models risk in 8-hour simulations,[19] but PacifiCorp stated it is capable of modeling risk using 24-hour simulations to better understand the impacts of longer duration events.[20]

High consequence areas can often be properly identified within an 8-hour simulation, particularly given that many catastrophic wildfires spread quickly after ignition, and much of the initial damage occurs during the initial burn. A 24-hour simulation can provide a broader, clearer understanding of overall risks, such as total acreage burned and smoke impacts, given that wildfires typically continue to burn beyond 8 hours.

Given that PacifiCorp stated it can evaluate wildfire spread beyond 8 hours, and the larger areas designated as high consequence under 24-hour simulations, PacifiCorp's Base WMP must clarify how the different simulation durations can be used within its risk modeling approach. This clarification must include a specific discussion of the criteria used in selecting which duration is appropriate and a justification of these criteria as PacifiCorp implements or continues to explore 24-hour simulations. See Section 5.4.1, PC-26B-01: Continued Risk Model Development.

5.1.3 Risk Scenarios

As part of risk scenario selection, the WMP Guidelines require evaluation of extreme event scenarios,[21] which can include the impact of climate change. As part of its extreme risk scenario evaluation, PacifiCorp is implementing a climate change component into its risk model, with anticipated completion at the end of 2026.[22]

PacifiCorp is working with the Electric Power Research Institute to develop a framework for "executing company-specific climate vulnerability assessments."[23] From these assessments, PacifiCorp will work with Argonne National Laboratory, given its expertise in regional climate modeling, "to build a high-resolution, dynamically downscaled climate model."[24] Based on the outcome, PacifiCorp will conduct its "asset vulnerability assessment to withstand

[17] PacifiCorp 2026-2028 Base WMP R2, page 122.

[18] PacifiCorp 2026-2028 Base WMP R2, page 122.

[19] PacifiCorp 2026-2028 Base WMP R2, page 57.

[20] PacifiCorp 2026-2028 Base WMP R2, page 62.

[21] WMP Guidelines, page 44.

[22] PacifiCorp 2026-2028 Base WMP R2, page 111; PacifiCorp response to Data Request 10, Question 3.

[23] PacifiCorp response to Data Request 10, Question 3.a.

[24] PacifiCorp response to Data Request 10, Question 3.b.

extreme events."[25] This climate vulnerability assessment is currently underway with completion scheduled for 2026 of modeled climate change impacts on extreme and average weather events.[26] Full delivery of the assessment is scheduled for 2027,[27] including potential use in PacifiCorp's design standards and risk modeling,[28] This climate vulnerability assessment will include evaluating what meteorological impacts to consider as part of PacifiCorp's scenario analysis, particularly for extreme event scenarios.

Given that PacifiCorp's climate change planning model is still being implemented, PacifiCorp would benefit from collaboration with all investor-owned utilities (IOUs) to determine the best methodologies, impacts, and considerations when integrating climate change and extreme scenarios into its risk models.[29] See Section 5.4.2, PC-26B-02: Further Evaluation of Climate Change Impact on Extreme Scenarios and Section 5.4.3, PC-26B-03: Collaboration on Meteorological Scenarios.

5.1.4 Risk Analysis Results and Presentation

5.1.4.1 Risk Prioritization

PacifiCorp's current modeling methodology only determines wildfire risk score and does not yet include outage program risk score since those components are still being developed and integrated. PacifiCorp confirmed it has quantified PSPS and PEDS risk scores as of January 2026,[30] but still needs to implement such into its decision-making process and continue to update its risk model, including how it is prioritizing based on risk scores.

While fuel/terrain and wind scores may be useful indicators of high-risk areas within PacifiCorp's service territory, prioritizing based on these risk contributors means that PacifiCorp is not capturing all risks across its system. For instance, PSPS and PEDS risk are not currently captured in PacifiCorp's risk models, nor are community vulnerability metrics. As discussed in Section 5.1.1 Methodology, because PacifiCorp is still in the process of determining its overall utility risk scores, PacifiCorp provided prioritized lists of its top riskiest circuits solely based on fuel/terrain and wind risk scores.[31]

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[25] PacifiCorp response to Data Request 10, Question 3.c.

[26] PacifiCorp 2026-2028 Base WMP R2, page 111.

[27] PacifiCorp response to Data Request 10, Question 3.d.

[28] PacifiCorp 2026-2028 Base WMP R2, page 343.

[29] For purposes of this Decision, IOUs include PG&E, SCE, SDG&E, BVES, and Liberty.

[30] PacifiCorp response to Data Request 21, Question 1.

[31] PacifiCorp 2026-2028 Base WMP R2, page 103.

PacifiCorp must provide completed tables related to risk ranking of circuits with the latest prioritization of circuits based on overall utility risk scores as opposed to fuel/terrain and wind scores. See Section 5.4.1, PC-26B-01: Continued Risk Model Development.

5.1.4.2 External Review

Conducting an external review is an important part of validating a risk model to ensure that modeling methodologies are consistent with industry best practices, that model outputs are logical and accurate to understanding risk, and that risk modeling efforts are forward looking. An external review conducted by risk modeling experts helps identify shortcomings in the risk model that PacifiCorp should improve upon.

As noted in Section 5.1.1 Methodology, PacifiCorp is in the process of implementing its risk model and developing additional components for it. Therefore, PacifiCorp has not yet conducted an independent or external review of its risk modeling data, as required by the WMP Guidelines.[32, 33] PacifiCorp stated it is waiting until it completes its updated risk model to engage a third-party review.[34] It is important that PacifiCorp validate its risk model through an external review once the model is updated.

PacifiCorp must still first develop a process for the external review of its risk model and can be done now given that portions of PacifiCorp's risk model are still under development and will need to be reviewed. See Section 5.4.6, PC-25U-03: Independent Review Transparency.

5.1.5 Ignition Risk Drivers

PacifiCorp's current ignition risk driver identification and tracking system must be improved upon to reduce the number of ignitions PacifiCorp categorizes as "Unknown."

PacifiCorp is not yet able to demonstrate a thorough and accurate understanding of ignition risk drivers across its system because PacifiCorp does not identify enough distinct categories of potential ignition risk drivers. PacifiCorp's *Table 3-1: List of Risks and Risk Drivers to Prioritize* showed that PacifiCorp identified "Unknown" to be its highest ignition risk driver category. By having 24 percent of its ignitions categorized as unknown, the actual sources of the risk drivers are missing and not being proactively addressed. The next highest categories for risk drivers are "Outside Clearance Zone" and "Fire", each accounting for 14 percent of ignitions within the HFTD.[35] These three risk driver categories account for 52 percent of

[32] PacifiCorp 2026-2028 Base WMP R2, page 106.

[33] WMP Guidelines, Appendix B, page B-6.

[34] PacifiCorp 2026-2028 Base WMP R2, page 106.

[35] PacifiCorp 2026-2028 Base WMP R2, pages 35-39.

PacifiCorp's risk drivers. From 2022-2024, 24 percent of the ignitions labeled with an unknown risk driver occurred within the HFTD.[36, 37]

To better identify and analyze ignition risk drivers, PacifiCorp established an incident tracking database in 2020. PacifiCorp uses its incident tracking database to inform how it can mitigate potential ignition risk drivers based on specific fire incident information and adjust asset management and procedures.[38] Yet while PacifiCorp has been tracking fire incidents since 2020,[39] it stated that it cannot develop a meaningful ignition risk driver trend analysis until early 2028.[40]

This risk driver trend analysis will not contribute to PacifiCorp's broader understanding of ignition risk unless PacifiCorp can more accurately and specifically identify ignition risk drivers. PacifiCorp must continue to use its incident tracking database to understand and more accurately categorize ignition risk drivers and minimize unknowns.

Additionally, PacifiCorp has not demonstrated that it has put procedures in place to properly investigate and identify ignition causes. These procedures include running post-incident root cause analysis to put forth its best effort to identify and understand what risk driver occurred.

It is important that PacifiCorp work to minimize "Unknown" risk drivers to understand what risks exist across its system. By having the top risk as "Unknown," PacifiCorp fails to demonstrate that it understands what presents the most risk to its system and therefore fails to be able to create a mitigation plan to address those risks.

For more information discussing Energy Safety's concern with PacifiCorp's lack of information regarding its equipment risk drivers, see Sections 8.2.3 and 8.5.7.

To gain further understanding of the risk within its system, PacifiCorp must begin tracking more risk drivers, provide a plan to update its methodology, and report on its progress in its next Base WMP. See Section 5.4.4, PC-26B-04: Ignition Risk Drivers.

5.2 Previous Areas for Continued Improvement

In the Energy Safety Decision for the PacifiCorp 2025 WMP Update, Energy Safety identified areas related to risk methodology and assessment where PacifiCorp must continue to improve its wildfire mitigation capabilities. This section summarizes the requirements

[36] PacifiCorp 2026-2028 Base WMP R2, pages 35-39.

[37] PacifiCorp response to Data Request 3, Question 8.a.

[38] PacifiCorp 2026-2028 Base WMP R2, page 229.

[39] PacifiCorp 2026-2028 Base WMP R2, page 65.

[40] PacifiCorp response to Data Request 6 Question 4.

imposed by those areas for continued improvement, PacifiCorp's response to those requirements, and Energy Safety's evaluation of the response.

5.2.1 PC-25U-01. Proposed Changes to the HFTD

For this area for continued improvement, Energy Safety required PacifiCorp to provide in its 2026-2028 Base WMP a process outlining how it compares areas in its HFRA to the current HFTD; and its plan for submitting a proposed change to the CPUC to modify the CPUC-defined HFTD for any areas that PacifiCorp finds should be prioritized for mitigation efforts and considered for recognition by the CPUC as HFTD.[41]

5.2.1.1 PC-25U-01: PacifiCorp Response Summary

In its 2026-2028 Base WMP, PacifiCorp reported that it developed an HFRA for its California service territory. PacifiCorp's HFRA is separate and distinct from the HFTD. PacifiCorp stated it will create a new HFRA boundary with each major planning model release based on the 85th percentile (top 15 percent) of wind or fuel/terrain risk scores.[42] Once PacifiCorp's new HFRA boundary is established, HFRA risk is then compared to HFTD risk. PacifiCorp plans to file a request to the CPUC no later than 2026 for the CPUC to include the HFRA into the HFTD.[43]

5.2.1.2 PC-25U-01: Energy Safety Evaluation

At this stage in PacifiCorp's development of its HFRA, PacifiCorp's HFRA expansion appears appropriate because PacifiCorp provided the thresholds it is using to determine whether an area is within its HFRA or not (e.g., the 85th percentile for initial analysis and the 95th percentile for HFTD comparison). These thresholds can help PacifiCorp capture additional risks to consider for hardening: 60 percent of the grid hardening work is planned in the HFTD, with the remaining 40 percent planned within the HFRA. [44, 45] Given that all of its grid hardening work is planned within the HFTD and HFRA, PacifiCorp is demonstrating that it is focusing its mitigation work within the HFTD and planning to capture additional risks that are outside the HFTD.

PacifiCorp must continue to report within its WMP the impacts and changes to its HFRA resulting from its updated risk model. PacifiCorp should continue to prioritize mitigations for its riskiest areas, whether within the HFTD or HFRA. As its risk modeling methodology

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[41] Decision for PacifiCorp 2025 WMP Update, page 69.

[42] PacifiCorp 2026-2028 Base WMP R2, page 525.

[43] PacifiCorp 2026-2028 Base WMP R2, pages 525-526.

[44] PacifiCorp 2024 Q4 QDR, Table 9.

[45] PacifiCorp response to Data Request 15, Question 2.

continues to mature, PacifiCorp must thoroughly document and track any changes to its HFRA.

As such, PacifiCorp must continue to improve in this area for its next Base WMP. Section 5.4.1 sets forth the requirements for improvement in PC-26B-01: Continued Risk Model Development.

5.2.2 PC-23B-02. Calculating Risk Scores Using 95th Percentile Values

For this area for continued improvement, Energy Safety required PacifiCorp to provide a plan, with milestones, in its 2026-2028 Base WMP for transitioning from using 95th percentile values to probability distributions when aggregating risk scores for mitigation evaluation, cost/benefit calculations, and risk ranking.[46] If PacifiCorp was unable to transition to using probability distributions, Energy Safety required PacifiCorp to:[47]

- Propose an alternative strategy or demonstrate that its current methodologies provide accurate outputs for calculating known risk.
- Provide an explanation for each calculation of risk score where PacifiCorp is calculating or aggregating risk scores when percentiles were used.
- Describe any steps PacifiCorp is taking to explore the use of probability distributions in the future.

5.2.2.1 PC-23B-02: PacifiCorp Response Summary

In its 2026-2028 Base WMP, PacifiCorp reported that it is planning to move toward using probability distributions for wind and fuel/terrain risk score calculations by 2027.[48] PacifiCorp's response was brief and did not provide distinct milestones on how it is planning to move towards, and evaluate the use of, probability distributions.[49]

5.2.2.2 PC-23B-02: Energy Safety Evaluation

PacifiCorp did not provide all requirements outlined in PC-23B-02, including milestones for transitioning from using 95th percentile values to probability distributions, nor did it provide sufficient detail on its alternative strategy of using 95th percentile.

Given that PacifiCorp is still in the process of moving towards probability distributions by 2027, PacifiCorp must continue to provide Energy Safety with updates to ensure that

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[46] Decision for PacifiCorp 2025 WMP Update, pages 64-65.

[47] Decision for PacifiCorp 2023-2025 Base WMP, pages 80-81.

[48] PacifiCorp 2026-2028 Base WMP R2, page 527.

[49] PacifiCorp 2026-2028 Base WMP R2, page 527.

PacifiCorp makes progress as described in Section 5.1.4 above. Section 5.4.1 sets forth the requirements for improvement in PC-26B-01: Continued Risk Model Development.

5.2.3 PC-25U-02. PSPS and Wildfire Risk Trade-Off Transparency

For this area for continued improvement, Energy Safety required PacifiCorp to provide in its 2026-2028 Base WMP a description of how it plans to quantify and integrate PSPS risk into its overall risk assessment.[50] Energy Safety required PacifiCorp to demonstrate how it will analyze the trade-offs between PSPS risk and wildfire risk.[51] Energy Safety also required PacifiCorp to provide a plan, timeline, and milestones for implementing PSPS risk calculations into its risk modeling tools.[52]

5.2.3.1 PC-25U-02: PacifiCorp Response Summary

In its 2026-2028 Base WMP, PacifiCorp stated that it is planning to integrate its PSPS risk model with its wildfire risk model by the end of 2025.[53] PSPS risk will include the PSPS Likelihood of Risk Event (LoRE) and PSPS Consequence of Risk Event components (CoRE).[54] PacifiCorp stated that it "does not intend to make trade-offs between wildfire risk and PSPS risk."[55] With PSPS risk integrated into its model, PacifiCorp expects "that wildfire risk will continue to drive grid hardening projects,"[56] given that PacifiCorp has not historically had much PSPS activity.

5.2.3.2 PC-25U-02: Energy Safety Evaluation

PacifiCorp stated that it is still working on PSPS risk modeling and provided a discussion of what it is evaluating as part of PSPS risk.[57] PacifiCorp stated that there will not be trade-offs between wildfire risk and PSPS risk, but it is not clear at what magnitude risk scores will be impacted.

Given that its PSPS component has not been fully integrated into its WMP, PacifiCorp has not yet demonstrated its calculations nor understanding of the magnitude of its PSPS risk. This lack of full risk model development has led to PacifiCorp listing many components within its

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[50] Decision for PacifiCorp 2025 WMP Update, page 65.

[51] Decision for PacifiCorp 2025 WMP Update, page 65.

[52] Decision for PacifiCorp 2025 WMP Update, page 65.

[53] PacifiCorp 2026-2028 Base WMP R2, pages 527-529.

[54] PacifiCorp 2026-2028 Base WMP R2, page 528.

[55] PacifiCorp 2026-2028 Base WMP R2, page 529.

[56] PacifiCorp 2026-2028 Base WMP R2, page 529.

[57] PacifiCorp 2026-2028 Base WMP R2, pages 528-529.

Sections 5 and 6 as "TBD" (e.g., overall utility risk score).[58] "TBD" or "To Be Determined" is a placeholder rather than a concrete value and cannot be evaluated or analyzed. While PacifiCorp provided other ways it selects mitigations for the riskiest portions of its service territory in the interim, PacifiCorp must continue to develop its understanding of its PSPS risk, and its impact on its overall utility risk to demonstrate continued improvement.

As such, PacifiCorp must improve in this area for its next Base WMP. Section 5.4.1 sets forth the requirements for improvement in PC-26B-01: Continued Risk Model Development.

5.2.4 PC-25U-03. Independent Review Transparency

For this area for continued improvement, Energy Safety required PacifiCorp to provide in its 2026-2028 Base WMP a detailed plan for implementing new procedures for reviewing and validating its wildfire risk models.[59] Energy Safety required PacifiCorp to provide a status update regarding its plan to obtain an independent third-party to review its risk models.[60] Lastly, Energy Safety required PacifiCorp to provide a plan, timeline, and milestones (including target completion dates) for incorporating any changes to its risk model based on the third-party review.[61] The plan must include a description of any potential complicating factors relating to implementation.[62]

5.2.4.1 PC-25U-03: PacifiCorp Response Summary

PacifiCorp reported that after its addition of PSPS risk, PEDS risk, and a major architectural overhaul, PacifiCorp will engage third-party consultants for an independent review of its risk model.[63] PacifiCorp expects this independent review to begin in mid-2026 and be completed in 2027.[64]

5.2.4.2 PC-25U-03: Energy Safety Evaluation

PacifiCorp's response did not meet the requirements of PC-25U-03, because while PacifiCorp discussed completing a third-party review, PacifiCorp did not provide a complete plan for implementing an independent review, such as associated procedures, detailed milestones with discrete tasks to complete, and a plan on incorporating changes to its risk model.[65] It is

[58] PacifiCorp 2026-2028 Base WMP R2, Tables 5-5, 6-1, 6-3, 6-4, PAC 6-1, 8-1, 9-1, 9-2, and 10-1; and Figure 6-1.

[59] Decision for PacifiCorp 2025 WMP Update, page 66.

[60] Decision for PacifiCorp 2025 WMP Update, page 66.

[61] Decision for PacifiCorp 2025 WMP Update, page 66.

[62] Decision for PacifiCorp 2025 WMP Update, page 66.

[63] PacifiCorp 2026-2028 Base WMP R2, page 530.

[64] PacifiCorp 2026-2028 Base WMP R2, page 530.

[65] PacifiCorp 2026-2028 Base WMP R2, page 530.

important that PacifiCorp develop procedures for its independent review, and secure and complete a third-party review to demonstrate proper validation and verification.

PacifiCorp stated that it could not complete an independent review because it is waiting for its model to be completed before engaging a third-party evaluator.[66] PacifiCorp must provide its plan for obtaining and completing a third-party review once the model is complete. This plan will ensure that PacifiCorp has taken the necessary measures to prepare for a third-party to complete the required review and establish a process for that review to thereby expedite validation once the risk model is completed.

As such, PacifiCorp must continue to improve in this area in its next Base WMP. Section 5.4.6 sets forth the requirements for improvement. See PC-25U-03: Independent Review Transparency.

5.3 Revision Notice Critical Issues

Energy Safety issued PacifiCorp a Revision Notice for its 2026-2028 Base WMP. This section evaluates PacifiCorp's response to that Revision Notice as it relates to risk methodology and assessment.[67]

5.3.1 RN-PC-26-03. PacifiCorp Must Provide Greater Consistency in Explaining Components of Its Risk Model and Provide Transparency into the Relationship Between Each Component

Energy Safety required PacifiCorp to update its 2026-2028 Base WMP to ensure that it consistently uses risk modeling definitions that follow the definitions provided in the WMP Guidelines, such as those for "ignition likelihood" and "burn likelihood."[68] Energy Safety required, similar to a recommendation from The Green Power Institute, that PacifiCorp consistently define any risk modeling terms it used that are not already defined within the WMP Guidelines.[69]

5.3.1.1 RN-PC-26-03: PacifiCorp Response Summary

In the PacifiCorp Revision Notice Response, PacifiCorp modified its Base WMP to utilize more consistent terminology, as directed. PacifiCorp's modifications included more consistent use of LoRE, CoRE, ignition likelihood, burn probability, wildfire consequences, wildfire

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[66] PacifiCorp 2026-2028 Base WMP R2, page 530.

[67] Revision Notice for the PacifiCorp 2026-2028 Base WMP, pages 9-12.

[68] Revision Notice for the PacifiCorp 2026-2028 Base WMP, pages 9-12.

[69] GPI Opening Comments, pages 7-8.

likelihood, and burn likelihood. For instance, PacifiCorp updated the names of its risk components in *Table 5-4: Summary of Risk Models* to be more consistent, [70] as well as the definitions of risk modeling components provided in Section 5.2 of its revised Base WMP.[71]

5.3.1.2 RN-PC-26-03: Energy Safety Evaluation

PacifiCorp's modifications in its revised Base WMP provide consistency in its use of wildfire risk modeling terms that better align with the WMP Guidelines. Section 5 of PacifiCorp's revised Base WMP now clearly defines which components and terminologies are being discussed, thus meeting the WMP Guideline requirements. PacifiCorp's risk modeling terminology is now defined and included within its risk model discussion.

Energy Safety finds that PacifiCorp has resolved this critical issue.

5.4 Areas for Continued Improvement for Future WMP Submissions

As discussed above, Energy Safety has identified areas pertaining to risk methodology and assessment where the electrical corporation must demonstrate improvement in a future, specified WMP submission. This section sets forth the requirements for improvement.

5.4.1 PC-26B-01. Continued Risk Model Development

Summary: PacifiCorp continues its process of developing components of its risk model, with components completed in 2025 still needing full integration into the WMP. Given that its risk model is still in development, PacifiCorp has many values missing (e.g., overall utility risk score, the expected risk reduction, and mitigation effectiveness scores) from its 2026-2028 Base WMP R2 submission.

Requirements: In its next Base WMP, PacifiCorp must:

- Describe the progress it has made in its plan to implement PSPS risk into its risk models, including any impact on risk scores, prioritization, and decision making.
- Describe the progress it has made in its plan to implement PEDS risk into its risk models, including any impact on risk prioritization such as decision-making and risk score output.
- Describe the progress it has made in its plan to implement mitigation effectiveness into its risk modeling process, including any impact on mitigation activity selection and prioritization. This implementation discussion must also describe PacifiCorp's

[70] PacifiCorp 2026-2028 Base WMP R1 Redline, *Table 5-4: Summary of Risk Models*, pages 98-102.

[71] PacifiCorp 2026-2028 Base WMP R1 Redline, pages 60, 68-70, 72, 79-81, 83.

plan to incorporate mitigation effectiveness values outside of grid hardening mitigation activities.

- Provide PacifiCorp's progress on evaluating and implementing 24-hour burn periods, including any related milestones, timelines, and impacts.
- Provide PacifiCorp's progress on evaluating and implementing probability distributions within its risk models, including any related milestones, timelines, and impacts.
- Provide the progress it has made to incorporate a portfolio optimization and grid hardening recommendation framework into its risk model.
- Provide its analysis of the existing HFRA boundaries and any changes to HFRA boundaries from any risk model updates. Include a description of any misalignment between existing HFRA boundaries and updated HFRA boundaries and explain if PacifiCorp will seek to change its HFRA boundaries because of the risk model updates.
- Provide an update on the progress it has made for the following deferred activities:
    - Evaluating the addition of timber loss as a consideration to vendor RAVE calculation.
    - Developing a centralized solution to track wildfire and PSPS risks.
- Given the completion of its new risk model, update any related values currently listed as "TBD" in the various tables and figures throughout PacifiCorp's Base WMP.

Discussed in: Sections 5.1.2, Risk Analysis Framework; 5.2.1, PC-25U-01: Proposed Changes to the HFTD; 5.2.3, PC-25U-02: PSPS and Wildfire Risk Trade-off Transparency; 6.1.2, Wildfire Mitigation Strategy; and 6.2.1, PC-25U-04: Vendor Fire Risk Model Implementation Milestones and Dates.

5.4.2 PC-26B-02. Further Evaluation of Climate Change Impact on Extreme Scenarios

Summary: Many large electrical corporations and small and multi-jurisdictional utilities (SMJUs), including PacifiCorp, are currently evaluating climate change impacts. PacifiCorp has not yet incorporated the effects of climate change into its risk model. This limits the understanding of maximizing risk benefit over an asset's lifetime. Current climate change evaluations are also limited in scope and do not evaluate impacts such as extreme weather event frequency and changes in vegetation species.

Requirements: In its next Base WMP, PacifiCorp must:

- Provide a joint report with the large electrical corporations and SMJUs evaluating the potential climate change impacts on wildfire risk over a fifty-year period to better understand potential risk reduction when implementing mitigations. This report must include identification of variables impacted by climate change and how those

variables impact risk modeling of wildfire risk. At a minimum, these variables must include:

- Extreme wind events
- Extreme drought impacts
- Vegetation pattern changes
- Wildfire pyrome identification and boundary changes

- As part of the Risk Model Working Group and as directed by Energy Safety, contribute to discussions and reports on topics such as how the joint study impacted PacifiCorp's risk modeling efforts and how PacifiCorp plans to implement any changes and findings discussed regarding climate change.

Discussed in: Section 5.1.3, Risk Scenarios.

5.4.3 PC-26B-03. Collaboration on Meteorological Scenarios

Summary: The weather scenarios used by the large electrical corporations and SMJUs in the calculation of probability and consequences vary significantly. The scenarios vary in the size of the historical record, how fire weather days are determined, and how the data is pruned for simulations. As PacifiCorp builds out the next version of its risk model, Energy Safety expects to see documentation detailing how meteorological scenarios are developed and implemented. PacifiCorp currently uses one Extreme Event Scenario based on climate change impacts on long term weather and vegetation patterns but does not provide much detail on how that was calculated nor timelines for its progress on developing additional scenarios.

Requirements: In its next Base WMP, PacifiCorp must:

- Define the historical period and fire weather days used for developing meteorological scenarios. Describe criteria for selection and justify exclusion of years and days outside of the selected dataset if that data would include historical extreme wind gusts or other extreme conditions.
- Demonstrate how distributions developed with the adopted Monte Carlo simulation method within the consequence risk model account for extreme weather that are not included within the referenced historical period. For example, demonstrate how PacifiCorp is matching the distribution of predicted fire size with historical distributions with significant tail risks.
- Collaborate with other electrical corporations via participation in the Risk Modeling Working Group (RMWG) to develop and summarize standardized extreme event scenarios, common calculation methods on the likelihood of occurrence, and a common approach to selecting weather scenarios (wind, moisture, fuels, etc.) to calculate consequences.

- Evaluate and provide an analysis of the sensitivity of the total risk in its service territory, including the risk impact of extreme event scenarios. This sensitivity analysis must also evaluate the impact of mitigations on extreme events.

Discussed in: Section 5.1.3, Risk Scenarios.

5.4.4 PC-26B-04. Ignition Risk Drivers

Summary: PacifiCorp's top risk driver is "Unknown." In its comments on the PacifiCorp 2026-2028 Base WMP R0, The Green Power Institute (GPI) stated a concern that PacifiCorp's "lack of understanding of risk drivers may impede its risk reduction assessment and the optimization of risk mitigation selection and prioritization."[72] Energy Safety shares these concerns and requires PacifiCorp to expand its ability to identify its risk drivers.

Requirements: In its next Base WMP, PacifiCorp must provide:

- The processes, procedures, protocols, and tools used for root cause analysis for ignition cause determinations.
- The qualifications and training of personnel assigned to determine ignition causes.
- Its Quality Assurance/Quality Control program for verification of ignition cause data.
- The results of its investigation for all previously identified "Unknown" risk drivers throughout its system to identify the cause of ignitions, as data is available.
- An updated Table 3-1 based on its re-evaluation of "Unknown" risk drivers throughout its system.
- All additional actions PacifiCorp is taking to minimize attributing future ignitions as "Unknown" causes, including a timeline for such actions.
- Copies of any procedure(s) impacted by re-evaluation and additional actions to minimize "Unknown" causes.

Discussed in: Section 5.1.5, Ignition Risk Drivers.

5.4.5 PC-26B-05. Development of Substantive Model Documentation

Summary: Several of the electrical corporations, including PacifiCorp, did not provide detailed technical documentation for its models and data sets used for risk analysis, including probability of failure and probability of ignition models, consequence models, weather models, and fuel models. PacifiCorp is still developing multiple components of its risk model, as described in Section 5 and Appendix B of its 2026-2028 Base WMP. As the model

[72] GPI Opening Comments, pages 4-5.

is developed further, PacifiCorp must be able to provide substantive documentation for the evaluation of the methodologies, verification, and validation of the models.

Requirements: In its next Base WMP, PacifiCorp must provide documentation on its risk analysis and modeling to capture the following information:

- A detailed description of its risk models, including assumptions or statistical approaches used for the risk models. This must include an explanation for any assumptions and scaling factors used;
- A detailed description of datasets used for modeling probability of ignition, consequence, weather, and fuels; including sources for data and why each dataset was included; and
- Description of the verification and validation approaches of each model, including any available results.

Discussed in: Section 5.1.1, Methodology.

5.4.6 PC-25U-03. Independent Review Transparency

Summary: In response to PC-25U-03, PacifiCorp committed to completing a third-party review once its risk model is updated but did not provide a detailed plan for implementing review procedures and contracting with an independent third-party reviewer for its risk model, including detailed milestones, which is necessary for model validation.

Requirements: In its next Base WMP, PacifiCorp must:

- Provide a detailed plan for implementing new procedures relating to reviewing and validating its wildfire risk models. This plan must be more detailed than the plan PacifiCorp provided in its 2025 WMP Update, and must include:
    - Attachments of any associated procedures.
    - All discrete tasks related to review and validation of PacifiCorp's risk models.
- Provide a status update regarding PacifiCorp's plan to obtain an independent third-party to review its risk models, including discrete dates for when PacifiCorp will obtain a third-party contractor and when the third-party review will be completed.
- Provide a plan, timeline, and milestones (include target completion dates) for incorporating any changes to its risk model based on the third-party review. The plan must include a description of any potential complicating factors relating to implementation.

Discussed in: Section 5.2.4, PC-25U-03: Independent Review Transparency.

Appendix C provides a consolidated list of areas for continued improvement and requirements.

6. Wildfire Mitigation Strategy Development

Chapter III, Section 6 of the WMP Guidelines requires the electrical corporation to provide a high-level overview of the risk evaluation process that inform its selection of a portfolio of initiative activities, as well as its overall wildfire mitigation strategy.[73] The PacifiCorp 2026-2028 Base WMP met the requirements of the WMP Guidelines for this section.

6.1 Discussion

This section discusses Energy Safety's evaluation of the wildfire mitigation strategy development section of the PacifiCorp 2026-2028 Base WMP.

6.1.1 Risk Evaluation

PacifiCorp's wildfire mitigation strategy will likely reduce the likelihood and impact of wildfires associated with electrical infrastructure. As discussed in Section 5, above, PacifiCorp's risk methodology and assessment are still under development, as PacifiCorp's risk model does not currently account for outage likelihood or consequence, and its risk model has not been subject to independent review. While PacifiCorp's risk model is under development, PacifiCorp uses wind, fuel, and terrain risk scores to select and prioritize mitigation work. These scores give PacifiCorp insight into where mitigations should be implemented until PacifiCorp's risk model is validated.

PacifiCorp first selected circuits with the highest risk, and then selected the portions of those circuits within the HFTD or HFRA to be mitigated.[74] Specifically, PacifiCorp determined which circuits had the maximum fuel/terrain scores and selected system hardening mitigations (i.e., covered conductor or undergrounding) for those circuits.[75] For wind driven risks, PacifiCorp primarily relied on operational mitigations (i.e., PSPS, PEDS).[76]

Since PacifiCorp focused its system hardening on the areas of its service territory with highest fuel/terrain risk scores, PacifiCorp demonstrated that it is targeting its highest risk areas using its current understanding of risk. However, PacifiCorp needs to continue to mature towards a more robust understanding of risk across its system to have a more effective

[73] Pub. Util. Code §§ 8386(c)(3), (12)-(14).

[74] PacifiCorp 2026-2028 Base WMP R2, pages 122-123.

[75] PacifiCorp 2026-2028 Base WMP R2, page 122.

[76] PacifiCorp 2026-2028 Base WMP R2, page 122.

approach towards choosing and prioritizing mitigations, as discussed in Sections 6.1.1.1 and 6.1.1.2, below.

6.1.1.1 Overall Utility Risk and Maximum Terrain Score

Energy Safety expects electrical corporations to use overall utility risk scores as the primary metric to prioritize mitigation work across their systems because overall utility risk considers the breadth of risk associated with electrical system operation.[77] Overall utility risk consists of wildfire risk and outage program risk.[78] As discussed in Sections 5.1.4 and 5.1.5, PacifiCorp's risk model is still under development. Until PacifiCorp further develops its risk model, it is unable to calculate overall utility risk and will continue to prioritize its system hardening mitigation work based on its current criteria that uses maximum circuit fuel/terrain score instead of overall utility risk.

As PacifiCorp's risk model undergoes further development, PacifiCorp's mitigation prioritization criteria should expand to fully capture the extent of risk across its system. Wildfire risk scores can capture more types of wildfire risk drivers than circuit fuel/terrain scores. PacifiCorp's circuits with the highest wildfire risk scores and the highest maximum fuel/terrain scores are not perfectly aligned. In its 2026-2028 Base WMP, only four of PacifiCorp's sixteen circuit segments and/or spans with the highest wildfire risk are also included in its list of circuits with maximum circuit fuel/terrain scores. [79, 80]

Since PacifiCorp currently uses only maximum circuit fuel/terrain scores to prioritize system hardening mitigation work such as undergrounding and covered conductor installation, only some of the circuit segments and/or spans with the highest wildfire risk are being targeted for system hardening. While the other circuit segments with highest wildfire risk may be subject to other types of mitigations, as PacifiCorp's risk model is further developed, Energy Safety expects PacifiCorp's mitigation prioritization methodology to be updated to consider broader risk across its system, such as through using wildfire risk or overall risk.

6.1.1.2 Circuit-Specific Information

PacifiCorp has performed and continues to perform mitigation work on circuits with maximum fuel/terrain scores, which is PacifiCorp's current criteria for system hardening mitigation prioritization.[81] In *Table PAC 6-1: Summary of Risk Reduction for Circuits With Maximum Fuel/Terrain Wildfire Risk Scores*, PacifiCorp provided the circuits and spans within PacifiCorp's system with the highest maximum fuel/terrain risk scores and the planned or

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[77] WMP Guidelines, page 60.

[78] WMP Guidelines, page 31.

[79] PacifiCorp 2026-2028 Base WMP R2, pages 123-124.

[80] PacifiCorp 2026-2028 Base WMP R2, pages 155-161.

[81] PacifiCorp 2026-2028 Base WMP R2, page 122.

completed system hardening mitigation work for those circuits or spans.[82] By providing specific circuits and spans selected with this interim mitigation selection strategy, PacifiCorp can consistently track the mitigation work performed on those circuits. PacifiCorp must continue to provide circuit specific information in its WMP to track mitigation work as it transitions from using maximum fuel/terrain scores to overall utility risk scores.

Energy Safety requires electrical corporations to list planned mitigations and the associated risk reduction for each high-risk circuit within the top 20 percent of overall utility risk for the years covered by the WMP.[83] As discussed in Section 6.1.1.1, PacifiCorp's circuits with the highest wildfire or overall utility risk, are not the same as the circuits with the highest maximum fuel/terrain risk scores. PacifiCorp provided targets for different mitigation activities for the 2026-2028 Base WMP in *Table 8-1: Grid Design, Operation, and Maintenance Targets by Year,*[84] but PacifiCorp has not yet selected specific circuits for these planned mitigations. Specifically, PacifiCorp scoped projects for 2026 but not for 2027 and 2028.[85]

PacifiCorp must provide circuit specific information for mitigation work on its highest risk circuits. See Section 6.3.1, PC-26B-06: Circuit Selection for WMP Targets.

6.1.2 Wildfire Mitigation Strategy

6.1.2.1 Portfolio Optimization System

PacifiCorp is still in the process of developing its portfolio optimization system and plans to complete it by the end of 2026.[86] This optimization system will ensure PacifiCorp can plan for combined mitigations to more effectively reduce wildfire risk by considering how mitigations can best be implemented together, and by quantifying cumulative risk reduction. As it continues to develop its risk model, PacifiCorp must incorporate its portfolio optimization strategies and analyze how its risk model outputs will impact its grid hardening mitigations. See Section 5.4.1, PC-26B-01: Continued Risk Model Development.

6.1.2.2 Effectiveness Scores

PacifiCorp cannot yet calculate risk reduction effectiveness scores for various mitigation activities because it is still in the process of calculating overall utility risk scores and developing a framework for calculating effectiveness.[87] PacifiCorp expected to have

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[82] PacifiCorp 2026-2028 Base WMP R2, pages 155-161.

[83] WMP Guidelines, page 76.

[84] PacifiCorp 2026-2028 Base WMP R2, pages 167-168.

[85] PacifiCorp response to Data Request 6, Question 2.

[86] PacifiCorp 2026-2028 Base WMP R2, page 112.

[87] PacifiCorp 2026-2028 Base WMP R2, pages 129, 140, 146.

calculated initial estimates of line rebuilds and system hardening risk reduction by the end of 2025.[88]

Being able to quantify overall risk reduction, which PacifiCorp cannot yet do due to its incomplete risk modeling components, is needed for calculating effectiveness scores.[89] It is essential for PacifiCorp to continue to progress in its ability to calculate overall risk reduction values in its risk model. Without effectiveness scores for its mitigation activities, the outputs from PacifiCorp's risk model are not as useful for mitigation selection. PacifiCorp should begin developing its initial effectiveness calculations in parallel with developing its risk model. As PacifiCorp develops its initial effectiveness score calculations, PacifiCorp must collaborate with the other IOUs to evaluate joint effectiveness scores. See Section 6.3.2, PC-26B-07: Joint Study for Mitigation Activity Effectiveness Estimates.

6.2 Previous Areas for Continued Improvement

In the Energy Safety Decision for the PacifiCorp 2025 WMP Update, Energy Safety identified areas related to wildfire mitigation strategy development where PacifiCorp must continue to improve its wildfire mitigation capabilities. This section summarizes the requirements imposed by those areas for continued improvement, PacifiCorp's response to those requirements, and Energy Safety's evaluation of the response.

6.2.1 PC-25U-04. Vendor Fire Risk Model Implementation Milestones and Dates

For this area for continued improvement, Energy Safety required PacifiCorp to provide in its 2026-2028 Base WMP its most recent plan and timeline for risk model implementation, including milestones and associated target completion dates, a detailed breakdown of the components and objectives required to complete a given task, and steps taken while its risk model implementation is in progress.[90] In addition, Energy Safety required PacifiCorp to provide an update on any deferred steps listed in *Table 6-7: Example of Utility Risk Assessment Improvement Plan* including the reason for any further deferrals.[91]

6.2.1.1 PC-25U-04: PacifiCorp Response Summary

In its 2026-2028 Base WMP, PacifiCorp provided its most recent plan and timeline for risk model implementation, including milestones and associated target completion dates.[92]

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[88] PacifiCorp 2026-2028 Base WMP R2, page 139.

[89] PacifiCorp 2026-2028 Base WMP R2, page 139.

[90] Decision for PacifiCorp 2025 WMP Update, pages 82-83.

[91] In the current WMP Guidelines, the corresponding table is *Table 5-6: Utility Risk Assessment Improvement Plan*.

[92] PacifiCorp 2026-2028 Base WMP R2, pages 110-120.

PacifiCorp also included the status of its deferred activities and stated that the deferred work will be included in its "Model Architecture Improvements" in 2025.[93]

6.2.1.2 PC-25U-04: Energy Safety Evaluation

PacifiCorp adequately responded to portions of PC-25U-04 by providing the required details on the timeline updates and updates on the vendor risk model implementation.

However, as it further develops its risk model, PacifiCorp is deferring the addition of timber loss to the vendor RAVE calculation and the centralization of wildfire and PSPS risks portion of its requirements.[94] The addition of timber loss to the vendor RAVE calculation will more fully capture impacts from wildfire. The centralization of wildfire and PSPS risks is essential for calculating overall utility risk as required by the WMP Guidelines.[95]

As PacifiCorp has yet to complete its risk model, including components discussed in PC-25U-04, PacifiCorp must continue to improve in this area for its next Base WMP. Section 5.4.1 sets forth the requirements for improvement in PC-26B-01: Continued Risk Model Development.

6.2.2 PC-25U-05. Cross-Utility Collaboration on Best Practices for Inclusion of Climate Change Forecasts in Consequence Modeling, Inclusion of Community Vulnerability in Consequence Modeling, and Utility Vegetation Management for Wildfire Safety

For this area for continued improvement, Energy Safety required PacifiCorp to continue its existing collaboration efforts and demonstrate that it has made efforts to specifically collaborate with PG&E, SDG&E, SCE, BVES, and Liberty, where appropriate and relevant to each IOU's interests.[96] Furthermore, Energy Safety required PacifiCorp to document in its 2026-2028 Base WMP how its collaboration efforts with the other IOUs impacted the WMP initiatives presented.[97] As with all IOUs, Energy Safety required PacifiCorp to continue to participate in Energy Safety-organized workshops and meetings on climate change forecasts in consequence modeling, community vulnerability in consequence modeling, and vegetation management.[98]

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[93] PacifiCorp 2026-2028 Base WMP R2, page 531.

[94] PacifiCorp 2026-2028 Base WMP R2, page 529.

[95] WMP Guidelines, page 31.

[96] Decision for PacifiCorp 2025 WMP Update, page 83.

[97] Decision for PacifiCorp 2025 WMP Update, page 83.

[98] Decision for PacifiCorp 2025 WMP Update, page 83.

6.2.2.1 PC-25U-05: PacifiCorp Response Summary

In its 2026-2028 Base WMP, PacifiCorp reported that it participates in Energy Safety's Risk Modeling Working Group and that it will participate in any forthcoming Energy Safety workshops and meetings on climate change forecasts in consequence modeling, inclusion of community vulnerability in consequence modeling, and utility vegetation management.[99] PacifiCorp also stated that it participates in joint IOU meetings to discuss WMP work, as well as in PG&E-hosted meetings on system protection.[100]

Further, PacifiCorp meets with communications teams from utilities in the western U.S. and Canada to discuss wildfire communications.[101] (Also see Section 11.1.2, External Collaboration and Coordination.) In addition, PacifiCorp exchanges wildfire risk mitigation knowledge as a member of the International Wildfire Risk Mitigation Consortium, and more broad exchange of utility knowledge through engagement with the Edison Electric Institute, the Institute of Electrical and Electronics Engineers, and the Western Energy Institute.[102]

6.2.2.2 PC-25U-05: Energy Safety Evaluation

PacifiCorp provided extensive information on its various engagements with other utilities and technical experts. Its participation in the Western Wildfire Communications Workshop[103] is reflected in its mitigation activity Best Practice Sharing with Other Utilities (CO-04), where its 2026-2028 qualitative targets are to participate in two workshops annually.[104] The workshops bring utility partners together twice a year to learn from each other on improving communications during a wildfire.[105] PacifiCorp hosted one of the two workshops in 2025 and plans to host another in 2026.[106]

PacifiCorp sufficiently responded to this area for continued improvement. No further reporting is required for this area for continued improvement.

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[99] PacifiCorp 2026-2028 Base WMP R2, pages 532-533.

[100] PacifiCorp 2026-2028 Base WMP R2, page 533.

[101] PacifiCorp 2026-2028 Base WMP R2, page 533.

[102] PacifiCorp 2026-2028 Base WMP R2, page 534.

[103] PacifiCorp 2026-2028 Base WMP R2, page468.

[104] PacifiCorp 2026-2028 Base WMP R2, page 397.

[105] PacifiCorp response to Data Request 16, Question 1.a.

[106] PacifiCorp response to Data Request 16, Question 1.a.

6.3 Areas for Continued Improvement for Future WMP Submissions

As discussed above, Energy Safety has identified areas pertaining to wildfire mitigation strategy development where the electrical corporation must demonstrate improvement in a future, specified WMP submission. This section sets forth the requirements for improvement.

6.3.1 PC-26B-06. Circuit Selection for WMP Targets

Summary: PacifiCorp has set mileage targets in 2027 and 2028 for line rebuild as part of mitigation activity GH-01, but stated that the specific circuits are subject to change over the next 18 months due to design, permitting, right of way, and material procurement activities that still need to take place. [107] It is important to have specific circuit information for planned mitigation activities, including rebuild miles, to ensure the mitigation work is being done on the highest risk circuits, and to ensure Energy Safety can assess performance with WMP targets.

Requirements: In its next Base WMP, PacifiCorp must provide an updated *Table 6-4: Summary of Risk Reduction for Top-Risk Circuits* and *Table PAC 6-1: Summary of Risk Reduction for Circuits With Maximum Fuel/Terrain Wildfire Risk Scores* that identifies the specific circuits that will be targeted for mitigation activities during the 2026-2028 Base WMP.

Discussed in: Section 6.1.1, Risk Evaluation.

6.3.2 PC-26B-07. Joint Study for Mitigation Activity Effectiveness Estimates

Summary: IOUs have varying methodologies and results when evaluating mitigation initiative effectiveness. These differences include variations in available in-field data, which type of data is used to determine effectiveness, and how effectiveness is calculated. PacifiCorp has not yet provided mitigation activity effectiveness estimates but states it will calculate initial estimates by the end of 2025.

Requirements: In its next Base WMP, PacifiCorp must collaborate with the IOUs to determine more consistent methodologies and evaluations of mitigation activity effectiveness. The IOUs must complete and provide a joint study and report by March 1, 2028, to the 2026-2028 Base WMP Docket (#2026-2028-Base-WMPs), and include that report in their subsequent Base WMP submission. The report must cover the following topics and summary:

- What type of data could be used to determine mitigation activity effectiveness. This topic must include discussions of the following:

[107] PacifiCorp response to Data Request 6, Question 2.b.

  - How to share available data across IOUs,
  - Evaluation of all mitigation activities performed by IOUs listed out with the various current effectiveness estimations being used by IOUs, and discussion of shortcomings for any mitigation activities that do not currently have effectiveness values calculated,
  - Evaluation of the use of ignition vs. outage vs. other data for evaluating ignition risk, including a comparison of benefits and weaknesses,
  - Other ways to augment useable data for any limited data sets, including any shortcomings and potential remedies for increasing accuracy when using additional data, and
  - Evaluation of variations on methodologies used by IOUs for translating data into probability of ignition.
- How IOUs measure effectiveness of mitigation activities against various risk drivers. This topic must include reporting on completion of the following:
  - Synchronization among IOUs on ways to calculate effectiveness of various mitigation activities against various risk drivers, including benefits and weaknesses of IOUs' current approaches as a comparison,
  - Weighing various risk drivers in terms of associated ignition and wildfire risk, and
  - Summation of various risk driver effectiveness values into overarching effectiveness value.
- How mitigation activity effectiveness is used when determining mitigation prioritization and selection. This topic must include the following:
  - A discussion of the granularity in which effectiveness values are used during mitigation selection based on an evaluation of location-specific risk drivers, including how those drivers are selected and weighted for a given area, and
  - An analysis of how mitigation activity informs and impacts cost-benefit analysis, including a discussion and comparison of any differences on scaling across IOUs.
- How to evaluate mitigation activities in combination. This topic must include reporting on completion of the following:
  - Synchronization among IOUs on potential combinations to include when calculating joint effectiveness estimates,
  - Demonstration that electrical corporations have shared measured in-field effectiveness with one another and have integrated it into overall effectiveness calculations, and

- Measuring overlapping and added benefit based on evaluation of ignition drivers impacted by various mitigations, including a comparison of IOUs' current efforts.

IOUs must also participate in Energy Safety-led activities, such as workshops or working group meetings, to further consider requirements around effectiveness.

Discussed in: Section 6.1.2.2, Effectiveness Scores.

Appendix C provides a consolidated list of areas for continued improvement and requirements.

7. Public Safety Power Shutoffs

Chapter III, Section 7 of the WMP Guidelines requires the electrical corporation to provide an overview narrative of planned initiative actions to reduce the impacts of Public Safety Power Shutoff (PSPS) events.[108] The PacifiCorp 2026-2028 Base WMP met the requirements of the WMP Guidelines for this section.

7.1 Discussion

This section discusses Energy Safety's evaluation of the PSPS section of the PacifiCorp 2026-2028 Base WMP.

The WMP Guidelines require that PacifiCorp provide a narrative of its initiatives to reduce the impacts (i.e., duration, frequency, and scope) of PSPS events.[109] Though scant, PacifiCorp discussed its initiatives to reduce the impact of PSPS events through its plans to install additional weather stations, [110] covered conductor,[111] and through its portable battery and generator rebate programs.[112]

PacifiCorp has not called a PSPS event since 2021 and, therefore, did not have any lessons learned for PSPS events since PacifiCorp's last WMP submission.[113]

PacifiCorp has a proactive expulsion fuse replacement program.[114] The program is likely to reduce PSPS impact, as PacifiCorp noted in its WMP: "areas currently subject to PSPS events may experience fewer outages as the upgraded fuses improve fault tolerance and reduce the likelihood of equipment-related risks triggering PSPS actions."[115]

As Energy Safety mentions in Sections 5.1.4.1 and 5.2.3, PacifiCorp's PSPS risk model component is still in development. Until it is complete, PacifiCorp cannot calculate or understand its magnitude of PSPS risk. PacifiCorp's forthcoming PSPS model, which was scheduled for completion at the end of 2025, will allow for a risk-informed evaluation of PSPS likelihood and consequence. Area for continued improvement PC-26B-01, Continued Risk Model Development requires, in part, that PacifiCorp describe the progress it has made in its

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[108] Pub. Util. Code, § 8386(c)(8).

[109] WMP Guidelines, page 79.

[110] PacifiCorp 2026-2028 Base WMP R2, page 163.

[111] PacifiCorp 2026-2028 Base WMP R2, page 163.

[112] PacifiCorp 2026-2028 Base WMP R2, page 164.

[113] Utility PSPS Reports.

[114] PacifiCorp response to Data Request 15, Question 4.

[115] PacifiCorp 2026-2028 Base WMP R2, page 190.

plan to incorporate PSPS risk into its risk models, including any impact on mitigation prioritization.[116]

With more knowledge on where its PSPS risk lies, in its next WMP submission, Energy Safety expects PacifiCorp to provide a more robust discussion of its activities to reduce impacts from PSPS events and provide an update on how the PSPS model component impacts PacifiCorp's current mitigation activities to minimize PSPS events and their impacts.

7.2 Areas for Continued Improvement

Energy Safety identifies no previous or new areas for continued improvement in the PSPS section for the PacifiCorp 2026-2028 Base WMP.

[116] See Section 5.4.1, Continued Risk Model Development.

8. Grid Design, Operations, and Maintenance

Chapter III, Section 8 of the WMP Guidelines requires the electrical corporation to include plans for grid design, operations, and maintenance programmatic areas in its WMP.[117] The PacifiCorp 2026-2028 Base WMP met the requirements of the WMP Guidelines for this section.

8.1 Summary of Anticipated Risk Reduction

PacifiCorp is planning several mitigation activities that are expected to lower its wildfire ignition risk. PacifiCorp's expanded covered conductor and undergrounding mitigation activities will reduce risk if PacifiCorp overcomes its past construction management challenges. In addition, its expanded enhanced safety settings equipment is a rapid response technology with strong risk reduction potential that will likely mitigate risk by instantly de-energizing lines during faults. Lastly, approximately 20 percent of PacifiCorp's transmission and distribution assets receive a detailed ground inspection and approximately 20 percent receive a drone inspection annually. Once either inspection is completed, only 2.5 years will lapse between an asset's detailed ground and drone inspection, reducing the time for risky conditions to develop on PacifiCorp's assets.

However, PacifiCorp must overcome its past construction management challenges for its full grid hardening efforts and resulting risk reduction to be realized; and the implementation of its enhanced safety settings activity must be completed for PacifiCorp to maximize the potential of the program.

8.2 Discussion

This section discusses Energy Safety's evaluation of the grid design, operations, and maintenance section of the PacifiCorp 2026-2028 Base WMP.

8.2.1 Grid Design and System Hardening

PacifiCorp's grid hardening effort consists of covered conductor, its most extensive grid hardening initiative, and undergrounding.

8.2.1.1 Covered Conductor Installation

PacifiCorp has not shown it can meet its annual covered conductor targets. PacifiCorp's covered conductor mitigation activity has historically faced challenges ramping up

[117] Pub. Util. Code §§ 8386(c)(3), (6), (10), (14)-(15).

installations due to construction management and resources limitations.[118] PacifiCorp has not met its covered conductor annual targets for the past four years. [119, 120, 121, 122, 123] PacifiCorp's cumulative target from 2021-2024 was approximately 403 circuit miles; however, PacifiCorp was able to install only 255 circuit miles,[124] 63 percent of its target. These constraints have also limited PacifiCorp's ability to design covered conductor circuits beyond 2026. PacifiCorp continues to rely on a contractor to help alleviate constraints. See *Table 8-1: Recent PacifiCorp Covered Conductor Activity* for PacifiCorp's previous covered conductor targets compared to its actual installation performance.

Table 8-1.
Recent PacifiCorp Covered Conductor Activity

Year	Target	Actual
2024[125]	80 miles	72 miles
2023[126]	130 miles	101 miles
2022[127]	112 miles	62 miles
2021[128]	81 miles	20 miles

[118] PacifiCorp 2026-2028 Base WMP R2, pages 172-173.

[119] PacifiCorp 2026-2028 Base WMP R2, pages 172-173.

[120] PacifiCorp 2022 Q4 QDR, PacifiCorp 2023 Q4 QDR, and PacifiCorp 2024 Q4 QDR.

[121] 2021 Annual Report on Compliance for PacifiCorp, page 25.

[122] 2022 Annual Report on Compliance for PacifiCorp, page 21

[123] 2023 Annual Report on Compliance for PacifiCorp, page 12.

[124] PacifiCorp 2022 Q4 QDR, PacifiCorp 2023 Q4 QDR, PacifiCorp 2024 Q4 QDR.

[125] PacifiCorp 2024 Q4 QDR.

[126] 2023 Annual Report on Compliance for PacifiCorp, page 12.

[127] 2022 Annual Report on Compliance for PacifiCorp, page 21.

[128] 2021 Annual Report on Compliance for PacifiCorp, page 25.

Despite its past construction management and resources limitation challenges, in its 2026-2028 Base WMP PacifiCorp set its largest cumulative covered conductor target to date, 350 miles as compared to PacifiCorp's cumulative target of 320 miles for 2022-2024[129] If PacifiCorp overcomes its constraints and meets its three-year target, it will reduce wildfire risk. PacifiCorp's 2026-2028 cumulative target represents about 9.6 percent[130] of its unhardened overhead lines within the HFTD per year, which is substantially higher than Liberty's targets (approximately 0.28 percent per year),[131] and twice as high as Bear Valley's targets (approximately 4.4 percent per year).[132]

Third-Party Contractor

To help alleviate its construction management challenges and meet its 2026-2028 cumulative target of 350 miles, PacifiCorp continues to rely on a contractor that will provide engineering, project management, and construction support. The contractor has assisted PacifiCorp since its previous Base WMP.[133] The contractor includes 15 engineering staff, eight project management staff, and 60 construction staff, which doubles PacifiCorp's previous project management resources and substantially increases its construction resources.[134] Energy Safety anticipates these additional personnel and resources will increase the feasibility of PacifiCorp meeting its covered conductor targets.

As it utilizes these additional resources, PacifiCorp must report in its next Base WMP on its lessons learned and the contractor's process, including aspects related to the following: project management, project controls, project reporting, engineering, estimating, permitting, surveying, material management, and construction. See Section 8.5.1, PC-26B-08: Integrated Planning and Performance of Covered Conductor, Undergrounding, and Installation of System Automation Equipment.

Circuit Selection is Incomplete

While PacifiCorp's cumulative covered conductor target represents important growth, PacifiCorp has not selected the circuits for covered conductor installation for 2027 and 2028. However, PacifiCorp has started planning the circuits where covered conductor will take place; however the "specific circuits that will be executed upon are subject to change over the

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[129] PacifiCorp 2026-2028 Base WMP R2, page 168.

[130] PacifiCorp 2026-2028 Base WMP R2, page 43; PacifiCorp response to Data Request 4, Question 12 [87/(319+23+770+40-201-45) = 0.096 or 9.6 percent]

[131] Liberty 2026-2028 Base WMP R1, page 43 [3.9/(28.41+2.36+1,259.86+124.73-43.57) = 0.0028 or 0.28 percent].

[132] BVES 2026-2028 Base WMP R1, page 32; BVES response to Data Request 5, Question 2 [8/(201+45-67.8) = 0.044 or 4.4 percent].

[133] PacifiCorp 2023-2025 Base WMP R6, page 157.

[134] PacifiCorp 2026-2028 Base WMP R2, page 173.

next 18 months as design, permitting, right of way, and material procurement activities take place."[135] The lack of circuit selection due to potential delays will likely cause PacifiCorp to not meet its 2027 and 2028 targets.

PacifiCorp must identify the specific circuits that it will target for mitigation activities during the 2026-2028 Base WMP are set forth in Section 6.3.1, PC-26B-06: Circuit Selection for WMP Targets.

8.2.1.2 Undergrounding of Electric Lines and/or Equipment

With its 2026-2028 Base WMP, PacifiCorp is reporting undergrounding as a separate mitigation activity. PacifiCorp has minimal project management experience with undergrounding. From 2022-2024 PacifiCorp undergrounded 6.1 miles.[136]PacifiCorp's 2026-2028 Base WMP targets are: 4 circuit-miles for 2026, 2 circuit-miles for 2027, and 4 circuit-miles for 2028, marking its largest WMP cycle targets to date.[137]

If PacifiCorp can meet its three-year undergrounding target, it will reduce wildfire risk; however, PacifiCorp lacks a project-specific undergrounding plan for 2027 and 2028. Uncertainty in circuit selection may cause PacifiCorp to not meet its 2027 and 2028 targets.[138] PacifiCorp stated that potential delays may occur due to permitting and right-of-way acquisition obstacles,[139] which cannot begin until PacifiCorp identifies specific circuits for undergrounding. To help alleviate its delays, PacifiCorp stated that "[t]he third-party contractor will help manage the completion of PacifiCorp's underground projects."[140] PacifiCorp needs to work with its third-party contractor to properly account for the permitting and right-of-away acquisition process for undergrounding projects.

PacifiCorp must report on its lessons learned and contractor's process. See Section 8.5.1, PC-26B-08: Integrated Planning and Performance of Covered Conductor, Undergrounding, and Installation of System Automation Equipment.

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[135] PacifiCorp response to Data Request 6, Question 2.

[136] PacifiCorp response to Data Request 4, Question 11.

[137] PacifiCorp response to Data Request 4, Question 11.

[138] PacifiCorp response to Data Request 6, Question 2.

[139] PacifiCorp response to Data Request 4, Question 11.

[140] PacifiCorp response to Data Request 7, Question 5.

8.2.1.3 Distribution and Transmission Pole Replacements and Reinforcements

PacifiCorp is currently evaluating the effectiveness of pole wraps to determine the location of future installations.[141] PacifiCorp plans to use this evaluation to establish future targets for this mitigation activity.[142]

PacifiCorp currently installs pole wraps around both transmission and distribution wooden poles as interim solutions to quickly mitigate wildfire risk. [143] For areas of heightened wildfire risk, PacifiCorp stated, "[d]epending on the pole configuration and location, the company may also install a fire mesh wrap around both transmission and distribution wooden poles."[144] Another anticipated use from PacifiCorp is that wraps "may also be applied on poles scoped for replacement with steel poles as an interim solution."[145] PacifiCorp committed to tracking pole wrap locations starting in 2025, and currently prioritizes locations for installation based on flame height modeling and cost-benefit analysis.[146, 147]

As discussed in response to Revision Notice issue RN-PC-26-07, PacifiCorp could not provide quantitative or qualitative targets for this mitigation activity at its current state of maturity. It is important for PacifiCorp to mature its pole wrap mitigation activity because fire-retardant wraps provide protection in high-risk wildfire areas by reducing the likelihood of wooden pole failure. In the event of wildfire, wooden pole failure can cause downed powerlines, which may impede egress for evacuating communities, and impede ingress for first responders and fire suppression personnel. For this reason, pole wraps are especially important near roads and in egress constrained areas. Therefore, PacifiCorp must account for nearby roads and egress/ingress constraints in its prioritization of installation locations.

PacifiCorp must complete, summarize, and report on the progress of its pole wrap installations. PacifiCorp must set targets for its pole wrap mitigation activity (GH-15) in its next Base WMP. See Section 8.5.2, PC-26B-09: Distribution and Transmission Pole Wrap Activity.

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[141] PacifiCorp response to Data Request 4, Question 13.

[142] PacifiCorp response to Data Request 4, Question 13.

[143] PacifiCorp 2026-2028 Base WMP R2, page 177.

[144] PacifiCorp 2026-2028 Base WMP R2, page 177.

[145] PacifiCorp 2026-2028 Base WMP R2, page 177.

[146] PacifiCorp 2026-2028 Base WMP R2, page 177.

[147] PacifiCorp response to Data Request 4, Question 13.

8.2.1.4 Emerging Grid Hardening Technology Installations and Pilots

PacifiCorp did not indicate planned evaluations or pilots for technologies already deployed by other electrical corporations, which limits cross-utility knowledge sharing and may limit PacifiCorp's innovation.[148] For example, PG&E deployed pole mounted sensors on its distribution system to enhanced situational awareness and support patrol and restoration of its distribution system.[149] PacifiCorp's primary mitigation strategy is covered conductor and it plans to deploy Enhanced Safety Settings (ESS) on nine circuits.[150] Therefore, piloting and installing emerging grid hardening technologies with tools to alert PacifiCorp to grid hazards and faults will increase situational awareness and increase the effectiveness of its covered conductor program when combined with PEDS.

PacifiCorp must conduct and provide a feasibility study of emerging grid hardening technologies, equipment, devices and settings. If it concludes that a resulting emerging grid hardening technology program is warranted for its service territory, it must include qualitative targets for testing, piloting, risk effectiveness evaluation, and implementation. See Section 8.5.3, where PacifiCorp must report on the outstanding elements of PC-25U-09 under PC-26B-10: Continued Monitoring of Enhanced Safety Settings (ESS) and Emerging Grid Technology.

8.2.1.5 Microgrids

PacifiCorp hired a consulting company to perform feasibility studies for three microgrid projects in California.[151] PacifiCorp states that it is currently evaluating the results from the studies.[152] Each microgrid site is within the HFTD.[153] These feasibility studies should allow PacifiCorp to assess if future microgrid projects are an effective method of reducing wildfire risk. Analyzing the results of those studies is essential to evaluating if PacifiCorp should continue pursuing microgrid sites. With these actions PacifiCorp exhibits maturity.

PacifiCorp must provide its evaluation of the three microgrid studies, and if it plans on proceeding with installing the microgrids. PacifiCorp must also provide its timeline for doing so in its next Base WMP. See Section 8.5.4, PC-26B-11: Microgrids Feasibility and Implementation.

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[148] PacifiCorp 2026-2028 Base WMP R2, page 183.

[149] PG&E 2026-2028 Base WMP R3, page 344.

[150] PacifiCorp 2026-2028 Base WMP R2, pages 167-168.

[151] PacifiCorp response to Data Request 6, Question 1.

[152] PacifiCorp 2026-2028 Base WMP R2, pages 183-184.

[153] PacifiCorp response to Data Request 6, Question 1.

8.2.1.6 Installation of System Automation Equipment

In 2026, PacifiCorp may face difficulty in ramping up system automation equipment installations, risking delays in meeting its target due to a standard 12–24-month lead time to complete an installation.[154, 155]

PacifiCorp's 2026 target for system automation equipment is four installations.[156] Its 2027 and 2028 targets are zero.[157] PacifiCorp acknowledged that in the past it "faced challenges in delivering system automation projects as planned, with ongoing difficulties in ramping up to meet target objectives."[158] To address its challenge of delivering system automation projects, PacifiCorp hired a construction management contractor to facilitate aspects of its system automation projects, including project management, project controls, project reporting, engineering, estimating, permitting, surveying, material management, construction, and post-construction inspections.[159] While the contractor will assist with ramping up system automation equipment installation, PacifiCorp will be required to monitor and report on the progress made by the contractor and discuss lessons learned that will impact the scoping and planning of this wildfire mitigation activity.

Given its historical challenges, like covered conductor and undergrounding, PacifiCorp must provide a plan and additional data to Energy Safety on how its construction management contractor and lessons learned from past projects will ensure it meets its targets. See Section 8.5.1, PC-26B-08: Integrated Planning and Performance of Covered Conductor, Undergrouding, and Installation of System Automation Equipment.

8.2.1.7 Line Removal in the HFTD

De-energized transmission lines can pose wildfire risk due to inadvertent re-energizations on the de-energized line. Inadvertent re-energizations are dependent on many factors (e.g., grounding configurations, proximity to energized lines, etc.). PG&E, SCE, SDG&E, PacifiCorp, and Liberty define, assess, and mitigate risk associated with de-energized transmission lines differently.[160] To ensure electrical corporations are managing wildfire risks from unremoved, de-energized transmission lines, each electrical corporation must develop a comprehensive mitigation strategy for these lines.

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[154] PacifiCorp 2026-2028 Base WMP R2, page 168.

[155] PacifiCorp 2026-2028 Base WMP R2, pages 185-186.

[156] PacifiCorp 2026-2028 Base WMP R2, page 168.

[157] PacifiCorp 2026-2028 Base WMP R2, page 168.

[158] PacifiCorp 2026-2028 Base WMP R2, page 185.

[159] PacifiCorp 2026-2028 Base WMP R2, page 186.

[160] Bear Valley Electric Service does not operate transmission lines.

As of August 2025, PacifiCorp reported no miles of de-energized transmission lines within the HFTD and HFRA pursuant to its definition of de-energized transmission lines.[161] PacifiCorp stated that lines may become de-energized due to changes in customer need or establishing alternate feeds.[162] However, outside of the HFTD and HFRA, PacifiCorp is reviewing its de-energized transmission lines with a priority to remove a de-energized line, unless the line is part of a rebuild project or is an active backup to an energized line.[163]

PacifiCorp is in the process of assessing the induction risk of its de-energized transmission lines. PacifiCorp is working with a contractor to run power simulation models on de-energized transmission lines to advise PacifiCorp on its induction risk and mitigations of mutually coupled transmission lines.[164] The contractor noted that short-circuited transmission line segments may lead to lower induced current, hence lower induction risk.[165] In addition to working with the contractor, PacifiCorp may perform grounding configuration and segmentations on its transmission lines to reduce the risk of induction.[166] PacifiCorp is the only electrical corporation in California that has taken the initiative to run power simulations models on de-energized transmission lines to advise on induction risk and mitigations.[167] PacifiCorp's action demonstrates forward looking growth.

As PacifiCorp develops its mitigation strategy for de-energized transmission lines, it must ensure its definition of de-energized transmission lines and risk assessment are consistent with, and considering lessons learned from, other electrical corporations. Additionally, PacifiCorp must report grounding configurations and segmentations taken to reduce induction risk within its service territory. Requirements for PacifiCorp related to its de-energized line assessment and removal are set forth in Section 8.5.5, PC-26B-12: De-energized Transmission Line Assessment and Removal.

8.2.1.8 Expulsion Fuse Replacement

PacifiCorp has replaced over 9,000 expulsion fuses with non-expulsion fuses.[168] An expulsion fuse protects a line by expulsing gases to extinguish an arc from a fault. Non-expulsion fuses do not emit the expulsing gases and are therefore safer. PacifiCorp continues to replace

[161] PacifiCorp response to Data Request 7, Question 6.

[162] PacifiCorp 2026-2028 Base WMP R2, pages 186-187.

[163] PacifiCorp response to Data Request 7, Question 6.

[164] PacifiCorp response to Data Request 7, Question 6.

[165] Idle Line Study.

[166]PacifiCorp response to Data Request 7, Question 6.

[167] PacifiCorp response to Data Request 7, Question 6.

[168] PacifiCorp 2026-2028 Base WMP R2, page 23.

expulsion fuses and reports an expulsion fuse replacement target of 1,500 for 2026,[169] compared to 500 in each 2024 and 2025.[170] PacifiCorp's risk models have identified additional HFRA within its territory which has led PacifiCorp to determine additional expulsion fuses that need replacement.[171]

PacifiCorp's proactive approach to replacing expulsion fuses with non-expulsion fuses will reduce ignition risk.

8.2.2 Asset Inspections

8.2.2.1 Transmission Patrol Inspections

PacifiCorp stated that it will perform patrol inspections on 100 percent of its HFRA transmission assets annually from 2026-2028.[172]

Annual patrol inspections are an industry standard.[173] PacifiCorp's transmission patrol inspections will reduce wildfire risk by identifying obvious conditions for remediation.

8.2.2.2 Distribution Patrol Inspections

PacifiCorp stated that it will perform patrol inspections on 100 percent of its HFRA distribution assets annually from 2026-2028.[174]

Annual distribution patrol inspections are an industry standard and meet minimum GO 165 requirements.[175, 176] PacifiCorp's distribution patrol inspections will reduce wildfire risk by identifying obvious conditions for remediation.

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[169] PacifiCorp 2026-2028 Base WMP R2, page 168.

[170] PacifiCorp 2023-2025 Base WMP R6, page 150.

[171] PacifiCorp 2026-2028 Base WMP R2, page 190.

[172] PacifiCorp 2026-2028 Base WMP R2, page 193.

[173] PG&E 2026-2028 Base WMP R3, page 230; SCE 2026-2028 Base WMP R2, page 274; and SDG&E 2026-2028 WMP R2, pages 180-181, *Table 8-2: Asset Inspection Frequency, Method, and Criteria*.

[174] PacifiCorp 2026-2028 Base WMP R2, page 193.

[175] PG&E 2026-2028 Base WMP R3, page 230; SCE 2026-2028 Base WMP R2, page 274; and SDG&E 2026-2028 Base WMP R2, pages 180-181, *Table 8-2: Asset Inspection Frequency, Method, and Criteria*.

[176] GO 165.

8.2.2.3 Detailed Transmission Inspections

Inspections

PacifiCorp has committed to performing drone inspections on its transmission assets in addition to detailed ground inspections.[177] PacifiCorp stated that its detailed ground inspections will be performed on a 5-year interval, while drone inspections will be performed on a 2-year cycle in the HFTD Tier 3, and on a 5-year cycle in the rest of the HFTD.[178] PacifiCorp stated that the drone and detailed ground inspection cycles will be offset such that assets undergo drone inspections approximately 2.5 years after a detailed ground inspection.[179]

Each year, approximately 20 percent of PacifiCorp's transmission assets in the HFTD receive a detailed ground inspection, which is more thorough than a patrol inspection, and approximately 20 percent will receive drone inspections. Approximately 2.5 years will lapse between a given asset's detailed ground and drone inspections, which will reduce the amount of time from five years for risky conditions to develop on PacifiCorp's assets between inspections. Assets in the HFTD Tier 3 will undergo drone inspections every two years.[180]

PacifiCorp's detailed ground transmission inspections, which occur once every five years, have historically been less frequent than those of its peers. Industry standard is to perform detailed ground transmission inspections on high-risk structures at least once every three years.[181] Table 8-2 demonstrates the percentage of the HFRA/HTFD that receives detailed transmission inspections by the various IOUs annually.

[177] PacifiCorp 2026-2028 Base WMP R2, page 193.

[178] PacifiCorp 2026-2028 Base WMP R2, page 213.

[179] PacifiCorp 2026-2028 Base WMP R2, pages 215-216.

[180] PacifiCorp 2026-2028 Base WMP R2, page 213.

[181] PG&E 2026-2028 Base WMP R3, page 230; SCE 2026-2028 Base WMP R2, page 274; SDG&E 2026-2028 Base WMP R2, pages 180-181, *Table 8-2: Asset Inspection Frequency, Method, and Criteria*.

Table 8-2.
Percent of HFRA/HFTD Inspected Annually via Detailed Transmission Inspections

IOU	Percent of HFRA/HFTD Inspected Annually via Detailed Transmission Inspections[182]
PG&E	40 percent
SCE	77 percent
SDG&E	33 percent
PacifiCorp	20 percent

However, PacifiCorp's 2026-2028 transmission detailed inspections will be supplemented by its aerial drone inspections.[183] The combination of aerial and ground inspections, which reduces the time between more thorough inspections to 2.5 years and increases the annual percentage of assets subject to more thorough inspections to 40 percent, will likely reduce wildfire risk because the assets will be inspected more frequently.

Though PacifiCorp's detailed transmission inspection interval and find rates are low, PacifiCorp is supplementing detailed inspections with annual infrared transmission inspections (see Section 8.2.2.5, below)[184] and performing drone inspections.[185] These supplemental infrared and drone inspections make for a more robust transmission inspection program and will likely reduce risk.

[182] PG&E 2026-2028 Base WMP R3, page 230; SCE 2026-2028 Base WMP R2, page 274; SDG&E 2026-2028 Base WMP R2, page 180; PacifiCorp 2026-2028 Base WMP R2, page 193. Bear Valley Electric Service does not operate transmission lines. Liberty's Revision Notice requires that it increase its inspection frequency.

[183] PacifiCorp 2026-2028 Base WMP R2, pages 211-213.

[184] PacifiCorp 2026-2028 Base WMP R2, page 193.

[185] PacifiCorp 2026-2028 Base WMP R2, page 193.

Find Rates

PacifiCorp's detailed transmission inspection find rate is 0.02 percent for Level 1 conditions and 1.54 percent for Level 2 conditions.[186] These find rates are significantly lower than other IOUs, as shown in Table 8-3.

Table 8-3.
Detailed Transmission Level 2 Condition Find Rates

IOU	Level 2 Condition Find Rate[187]
PG&E	19.2 percent
SCE	5.5 percent
SDG&E	7.52 percent
PacifiCorp	1.54 percent

While lower find rates do not necessarily indicate less-effective inspections, the magnitude of difference in find rates is concerning, particularly given that PacifiCorp performs less frequent inspections.

PacifiCorp must report on the find rates, number of findings, and types of findings from its drone and detailed transmission inspection programs to explain why its find rates are significantly lower than other IOUs. See Section 8.5.6, PC-26B-13: Transmission Detailed Inspection Comparative Analysis.

8.2.2.4 Detailed Distribution Inspections

PacifiCorp performs detailed distribution inspections on a five-year interval.[188] PacifiCorp's detailed distribution inspections meet but do not exceed the minimum GO 165 requirements.[189] PacifiCorp reported that detailed inspections will be supplemented in 2026-

[186] PacifiCorp 2026-2028 Base WMP R2, page 193.

[187] PG&E 2026-2028 Base WMP R3, page 230; SCE 2026-2028 Base WMP R2, page 274; SDG&E 2026-2028 WMP R2, pages 180-181; PacifiCorp 2026-2028 Base WMP R2, page 193, *Table 8-2: Asset Inspection Frequency, Method, and Criteria*.

[188] PacifiCorp 2026-2028 Base WMP R2, page 193.

[189] GO 165, pages 1, 2, 4.

2028 by aerial drone inspections. PacifiCorp, along with Liberty, BVES, and SDG&E, performs the least frequent detailed distribution inspections of all IOUs. Table 8-4 demonstrates the percentage of the HFRA/HFTD that receives detailed distribution inspections by the various IOUs annually.

*Table 8-4. **
Percent of HFRA/HFTD inspected Annually via Detailed Distribution Inspections

IOU	Percent of HFRA/HFTD Inspected Annually via Detailed Distribution Inspections[190]
PG&E	42 percent
SCE	72 percent
SDG&E	20 percent
BVES	20 percent
Liberty	20 percent
PacifiCorp	20 percent

Though PacifiCorp performs detailed distribution inspections as infrequently as permissible by GO 165,[191] PacifiCorp has committed to performing drone inspections on its distribution assets in addition to detailed distribution inspections.[192]

PacifiCorp stated that its drone inspections will be performed on a two-year cycle in the HFTD Tier 3, and a five-year cycle in the rest of the HFTD.[193]

[190] PG&E 2026-2028 Base WMP R3, page 230; SCE 2026-2028 Base WMP R2, page 274; SDG&E 2026-2028 Base WMP R2, pages 180-181; BVES 2026-2028 Base WMP R1, page 138; Liberty 2026-2028 Base WMP R1, page 136; PacifiCorp 2026-2028 Base WMP R2. page 193.

[191] GO 165.

[192] PacifiCorp 2026-2028 Base WMP R2, page 193.

[193] PacifiCorp 2026-2028 Base WMP R2, pages 215-216.

PacifiCorp reported that the drone inspection cycle will lag halfway through the detailed distribution inspections cycle.[194] Similar to PacifiCorp's detailed transmission inspections, the combination of aerial and ground inspections will likely reduce wildfire risk by reducing the time interval between inspections and increasing the likelihood of identifying issues that are difficult to detect from either an exclusively aerial or ground point of view.

8.2.2.5 Transmission Infrared Inspections

PacifiCorp performs infrared inspections on 100 percent of its transmission assets in the HFTD/HFRA annually.[195] Infrared inspections are performed aerially by a licensed thermographer via helicopter and are scheduled to occur when lines are near peak loading.[196]

Infrared inspections reduce wildfire risk on an electrical system by identifying thermal conditions for remediation. Thermal conditions are difficult to identify through other types of inspection.[197] By scheduling infrared inspections when its transmission lines are under peak load, PacifiCorp increases the likelihood it will identify existing thermal conditions. PacifiCorp's transmission infrared inspections will likely mitigate wildfire risk by identifying risky conditions for remediation that would otherwise remain undetected.

8.2.2.6 Distribution Infrared Inspections

PacifiCorp reported that it will perform infrared inspections on approximately 20 percent of its HFTD/HFRA distribution assets annually. Infrared images are captured during the distribution drone inspections discussed in Section 8.2.2.4.[198] PacifiCorp stated that it plans to schedule inspections during peak load conditions.[199] Routine distribution infrared inspections is a new mitigation activity for PacifiCorp, and 2026-2028 are the first years for which PacifiCorp has set distribution infrared inspection targets.[200, 201]

Similarly to transmission inspections, distribution infrared inspections reduce the wildfire risk on an electrical system by identifying thermal conditions for remediation that may otherwise remain undetected.[202] PacifiCorp's decision to schedule distribution infrared

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[194] PacifiCorp 2026-2028 Base WMP R2, pages 215-216.

[195] PacifiCorp 2026-2028 Base WMP R2, page 193.

[196] PacifiCorp 2026-2028 Base WMP R2, page 209.

[197] SCE 2026-2028 Base WMP R2, page 286.

[198] PacifiCorp 2026-2028 Base WMP R2, pages 205-206.

[199] PacifiCorp 2026-2028 Base WMP R2, page 208.

[200] PacifiCorp 2026-2028 Base WMP R2, page 193.

[201] PacifiCorp 2023-2025 Base WMP R6, pages 150-152.

[202] SCE 2026-2028 Base WMP R2, pages 283-284.

inspections during peak load conditions increases the likelihood it will identify a thermal condition. PacifiCorp's distribution infrared inspections will likely mitigate wildfire risk.

8.2.3 Equipment Maintenance and Repair

PacifiCorp monitors the condition of nearly all its equipment through visual inspections.[203] Because the condition of its equipment is monitored through visual inspections, it is important that these inspections are frequent and of high quality. Given the subjective nature of visual inspections, detailed equipment failure data should be leveraged to gauge the effectiveness of maintenance and inspection practices. PacifiCorp does not consistently collect detailed equipment failure data, which impedes its ability to identify gaps in its equipment maintenance practices. Additionally, the lack of detailed equipment failure data inhibits regulator and public-member efforts to evaluate PacifiCorp's equipment maintenance program.

When equipment failures or ignitions occur, detailed equipment failure and ignition data must be collected to identify equipment types that present a wildfire risk from failure, equipment failure trends, and potential areas for improvement in maintenance and inspection practices. PacifiCorp stated that it has limited information regarding the failures of, and ignitions associated with, the equipment types discussed in its Base WMP, Section 8.4, Equipment Maintenance and Repair.[204]

Following an equipment failure, PacifiCorp asks field personnel to complete a material failure report that is subsequently submitted to PacifiCorp's engineering standards team.[205] Engineering standards then determines if there is enough information for an investigation. If an investigation is conducted, a failure investigation and root cause analysis are carried out.[206]

PacifiCorp's procedures call for field personnel to complete a material failure report is a necessary initial component of a failure investigation program. However, PacifiCorp estimates only 0.2 percent of equipment failures resulted in a completed material failure report since the inception of the program.[207] It is essential that PacifiCorp leverage and improve its existing detailed equipment failure and ignition data collection processes.

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[203] PacifiCorp 2026-2028 Base WMP R2, pages 220-226.

[204] PacifiCorp 2026-2028 Base WMP R2, pages 220-230.

[205] PacifiCorp 2026-2028 Base WMP R2, page 227.

[206] PacifiCorp 2026-2028 Base WMP R2, page 227.

[207] PacifiCorp response to Data Request 7, Question 4.

PacifiCorp stated that it collects outage data, which includes whether the outage was due to equipment failure. If it was, PacifiCorp notes the specific components that failed.[208, 209] PacifiCorp's outage data includes equipment failure and associated components.[210] Though PacifiCorp collects equipment failure data related to outages, throughout Section 8.4 of its WMP PacifiCorp stated that it "has limited information on equipment failures and is unable to provide information on failures attributed" to any of the equipment types that required reporting in Section 8.4.[211] PacifiCorp must leverage its outage data to gain insight into the failure rates for many of the equipment types that required reporting in the WMP Guidelines.[212]

PG&E, SCE, and SDG&E have reported to the CPUC electrical system components that have been associated with ignitions since 2014.[213] While PacifiCorp collects outage data for most equipment types that have been associated with CPUC reportable ignitions,[214] PacifiCorp does not collect outage data for guy wire, clamp, pothead, riser, service connector, or service drop.[215] When establishing equipment failure data recording practices, PacifiCorp must at least collect failure data for equipment types that have been associated with CPUC reportable ignitions, given the wildfire risk associated with such equipment.

Given the gaps in PacifiCorp's equipment failure data collection, PacifiCorp must provide historical outage data, report on its review of the CPUC reportable ignitions since 2014, identify gaps in its outage and other equipment failure data collection, and modify its equipment failure and ignition data collection processes to effectively record failures and ignitions associated with equipment types associated with ignitions. See Section 8.5.7, PC-26B-14: Equipment Failure Data.

For an additional discussion regarding Energy Safety's concern with PacifiCorp's lack of information regarding its ignition risk drivers, see Sections 5.1.5 and 5.4.4.

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[208] PacifiCorp response to Data Request 7, Question 3, Attachment 1.

[209] PacifiCorp response to Data Request 7, Question 3, Attachment 2.

[210] PacifiCorp response to Data Request 7, Question 3, Attachment 1; PacifiCorp response to Data Request 7, Question 3, Attachment 2.

[211] PacifiCorp 2026-2028 Base WMP R2, pages 220-226.

[212] WMP Guidelines, pages 90-92.

[213] Fire Ignition Data.

[214] PacifiCorp response to Data Request 7, Question 3, Attachment 1; PacifiCorp response to Data Request 7, Question 3, Attachment 2.

[215] PacifiCorp response to Data Request 7, Question 3, Attachment 1; PacifiCorp response to Data Request 7, Question 3, Attachment 2.

8.2.4 Quality Assurance and Quality Control

PacifiCorp's 2026-2028 Base WMP R2 presented a unique tracking ID for each of its 13 asset quality assurance/quality control (QA/QC) mitigation activities and reflects a commitment to achieving a 2 percent margin of error and 95 percent pass rate for its distribution and transmission patrol, detailed and intrusive pole inspections [216]

The Base WMP also included separate population sizes, sample sizes, confidence levels, and pass rate targets for distribution and transmission, patrol, detailed, and intrusive pole inspections.[217]

In addition, in response to PC-25U-06, PacifiCorp renewed its contract for inspection services to set the QA/QC pass rate target requirements to 95-100 percent for 2025 inspections, which now aligns with its reported actual pass rate[218] and California industry standard.[219]

PacifiCorp also committed to performing post construction quality assurance inspections on all of its completed covered conductor, undergrounding, and system automation installation, as well as all pole and fuse replacement mitigation activities.[220]

These commitments demonstrate continued progress in its QA/QC practices. PacifiCorp's QA/QC program likely mitigates wildfire risk by auditing many grid hardening and inspection activities.

8.2.5 Work Orders

PacifiCorp reported 89 overdue Level 2 conditions in its HFTD. PacifiCorp's number of overdue HFTD work orders per circuit mile is among the lowest of all IOUs, as shown below in *Table 8-5: Overdue Work Orders per Circuit Mile*.

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[216] PacifiCorp 2026-2028 Base WMP R2, pages 234-235.

[217] PacifiCorp 2026-2028 Base WMP R2, pages 234-235.

[218] PacifiCorp 2023-2025 Base WMP R6, page 182.

[219] PG&E 2026-2028 Base WMP R3, page 308; SCE 2026-2028 Base WMP R2, page 306; SDG&E 2026-2028 Base WMP R2, pages 214-215.

[220] PacifiCorp 2026-2028 Base WMP R2, pages 234-235.

Table 8-5.
Overdue Work Orders per Circuit Mile

	Circuit miles in HFTD[221]	Overdue work orders in HFTD[222]	Overdue WO per circuit mile
PacifiCorp	1,556.49	89	0.057180
Liberty	1,968.77	394	0.200125
BVES	716.86	0	0
PG&E	33,486.97	173,914[223]	5.193483
SCE	21,221.00	13,834	0.651901
SDG&E	7,292.05	94	0.012891

Table 8-5, above, shows that PacifiCorp reported substantially fewer overdue work orders per mile in the HFTD than PG&E, SCE, and Liberty. PacifiCorp's small number of overdue work orders limits wildfire risk on its system resulting from identified but uncorrected conditions. Energy Safety will continue to monitor the number of ignition risk conditions PacifiCorp is identifying and closing via reporting required in the WMP Guidelines.

8.2.6 Grid Operations and Procedures

PacifiCorp's revised its protective devices settings strategy. Its protective setting previously referred to as Elevated Fire Risk (EFR) is now ESS.[224] EFR is now a setting mode under PacifiCorp's ESS.[225]

PacifiCorp's implementation of ESS can mitigate wildfire risk by rapidly de-energizing lines during faults; however, PacifiCorp has yet to perform a quantitative assessment on the

[221] PacifiCorp 2025 Q2 QDS.

[222] PacifiCorp, Liberty, BVES, SCE and SDG&E 2026-2028 Base WMPs, *Table 8-5: Number of Past Due Asset Work Orders Categorized by Age*.

[223] PG&E 2025 Q1 QDS, work orders with original due dates before January 1, 2025.

[224] PacifiCorp 2026-2028 Base WMP R2, page 258.

[225] PacifiCorp 2026-2028 Base WMP R2, page 260.

effectiveness of ESS and associated risk reduction.[226] A quantitative assessment is necessary to understand the impact the ESS program has on reducing wildfire risk in PacifiCorp's service territory.

Given PacifiCorp's revisions to its protective device settings strategy and to its risk models, Energy Safety modified PC-25U-09: Continued Monitoring of Enhanced Fire Risk (EFR) Settings to reflect the updated name for PacifiCorp's protective device settings strategy and updated the required progress. PacifiCorp is still required to perform a quantitative assessment for the effectiveness of its protective device settings strategy and risk reduction. See Section 8.5.3, PC-26B-10: Continued Monitoring of Enhanced Safety Settings (ESS) and Emerging Grid Technology.

8.3 Previous Areas for Continued Improvement

In the Energy Safety Decision for the PacifiCorp 2025 WMP Update, Energy Safety identified areas related to grid design, operations, and maintenance where PacifiCorp must continue to improve its wildfire mitigation capabilities. This section summarizes the requirements imposed by those areas for continued improvement, PacifiCorp's response to those requirements, and Energy Safety's evaluation of the response.

8.3.1 PC-25U-06. QA/QC Pass Rate Targets

For this area for continued improvement, Energy Safety required PacifiCorp to increase its QA/QC pass rate targets for inspections in its 2026-2028 Base WMP to between 95 and 100 percent so that PacifiCorp's pass rate targets are in alignment with PacifiCorp's actual pass rates[227] and the California industry standard.[228] PacifiCorp indicated in its 2025 WMP Update that it was hindered from changing its pass rate due to contractual arrangements.

8.3.1.1 PC-25U-06: PacifiCorp Response Summary

In its 2026-2028 Base WMP, PacifiCorp reported that it set the QA/QC requirements for detailed and intrusive inspections to align with California industry standard of 95-100 percent.[229] The new QA/QC requirements were to be rolled out in its 2025 inspections.[230]

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[226] PacifiCorp 2026-2028 Base WMP R2, pages 264-265.

[227] PacifiCorp's 2023-2025 Base WMP R6, page 182, Table 8-7.

[228] Energy Safety Decision on PacifiCorp 2025 WMP Update, pages 67-68.

[229] PacifiCorp 2026-2028 Base WMP R2, page 535.

[230] PacifiCorp 2026-2028 Base WMP R2, page 535.

8.3.1.2 PC-25U-06: Energy Safety Evaluation

PacifiCorp set pass rate targets of 95 percent for the QA/QC of its various asset inspection and hardening mitigation activities.[231]

As such, by setting these pass rates, PacifiCorp sufficiently responded to this area for continued improvement. No further reporting is required for this area for continued improvement.

8.3.2 PC-25U-07. Priority A/Level 1 Remediation and Imminent Threat Designation

For this area for continued improvement, Energy Safety required PacifiCorp to provide a plan to engage a third-party to audit all Priority A conditions identified from 2020 to 2023 in its 2026-2028 Base WMP.[232] In 2024, PacifiCorp did not provide a plan in response to PC-23B-12; instead, PacifiCorp stated it was working to engage an auditor but did not establish a timeline.[233] This third-party audit was required to evaluate whether the initially classified condition identified in an inspection should have been classified as an imminent threat, if the initial remediation timeframe was appropriate, and if the actual remediation timeframe was appropriate.

8.3.2.1 PC-25U-07: PacifiCorp Response Summary

The third-party audit PacifiCorp commissioned in response to PC-25U-07 was completed in November 2025. PacifiCorp included the report in Appendix D of its WMP.[234]

For each 2020-2023 Priority A condition audited, the third-party contractor stated it reviewed information pertaining to: inspection data, including responsible party, energy release risk determination, inspection comments and remarks, and wildfire risk-area determination. Each condition was cross referenced with GO 95, Rule 18-B and PacifiCorp's internal Policy No. 292.[235]

The auditor found that all 581 priority A conditions were appropriately classified by PacifiCorp, and that none met the requirements of an immediate threat.[236]

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[231] PacifiCorp 2026-2028 Base WMP R2, pages 234-235.

[232] Decision for PacifiCorp's 2025 WMP Update, pages 68-69.

[233] PacifiCorp 2025 WMP Update R2, page 37.

[234] PacifiCorp 2026-2028 Base WMP R1, Appendix G, Imminent Threat Condition Review, pages 45-56.

[235] PacifiCorp 2026-2028 Base WMP R1, Appendix G, Imminent Threat Condition Review, page 51.

[236] PacifiCorp 2026-2028 Base WMP R1, Appendix G, Imminent Threat Condition Review, page 56.

8.3.2.2 PC-25U-07: Energy Safety Evaluation

The third-party audit of PacifiCorp's audit results suggests that PacifiCorp is appropriately responding to its high-risk conditions. By completing the third-party audit and expanding beyond a plan, PacifiCorp sufficiently responded to this area for continued improvement. No further reporting is required for this area for continued improvement.

8.3.3 PC-25U-08. Asset Management and Enterprise Systems

Area for continued improvement PC-25U-08 was previously discussed in the Asset Management section. The evaluation of PC-25U-08 is now discussed in Section 12, Enterprise Systems.

8.3.4 PC-25U-09. Continued Monitoring of Enhanced Fire Risk (EFR) Settings

For this area for continued improvement, Energy Safety required PacifiCorp to provide in its 2026-2028 Base WMP: data when its EFR settings were enabled, an updated plan of actions being taken based on the data provided, an update on PacifiCorp's evaluation of the effectiveness of its EFR settings, and PacifiCorp's learnings of best practices from other electrical corporations.[237]

8.3.4.1 PC-25U-09: PacifiCorp Response Summary

In its 2026-2028 Base WMP, PacifiCorp provided an annual evaluation of ESS circuits.[238] Its evaluation included reliability impacts, number, duration, and frequency of outages, customers impacted, and outage response times when ESS settings were active. For the chosen circuits, short-term mitigation projects were prioritized (e.g., upgrades to cutouts, fuses, crossarms, and insulators).

However, not all requirements for PC-25U-09 were met. PacifiCorp has yet to complete a quantitative assessment measuring effectiveness and wildfire risk reduction from ESS settings. PacifiCorp has identified that it is currently developing a plan, working with internal experts, and collaborating with peer IOUs to define necessary data and establish an evaluation methodology.

8.3.4.2 PC-25U-09: Energy Safety Evaluation

PacifiCorp has shown progress by evaluating reliability impacts of ESS-enabled circuits and prioritizing mitigation projects based on outage data. However, PacifiCorp has not provided a

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[237] Decision for PacifiCorp 2025 WMP Update, page 68.

[238] PacifiCorp revised its protective settings scheme from EFR settings to ESS. EFR is now a configuration under ESS.

comprehensive quantitative assessment of ESS effectiveness in reducing wildfire risk, as required.

In its next Base WMP, PacifiCorp must submit this quantitative assessment, clearly demonstrating wildfire risk reduction through ESS settings. PacifiCorp also must indicate if it has implemented best practices from peer IOUs.

PacifiCorp must complete and submit this quantitative assessment, clearly demonstrating wildfire risk reduction through ESS.

As such, PacifiCorp must continue to improve in this area for its next Base WMP. Section 8.5.3 sets forth the remaining requirements for improvement in PC-26B-10: Continued Monitoring of Enhanced Safety Settings (ESS) and Emerging Grid Technology.

8.4 Revision Notice Critical Issues

Energy Safety issued PacifiCorp a Revision Notice for its 2026-2028 Base WMP. This section evaluates PacifiCorp's response to that Revision Notice as it relates to grid design, operations, and maintenance.[239]

8.4.1 RN-PC-26-04. PacifiCorp's Combined Targets for Covered Conductor and Undergrounding do Not Allow for Distinct, Trackable Targets

Energy Safety required PacifiCorp to revise its 2026-2028 Base WMP R0 to provide separate targets for covered conductor and underground mitigation activities. PacifiCorp's mitigation activity for Line Rebuild (GH-01) initially included both covered conductor and underground activities. Each mitigation activity must be distinctly named and have its own unique tracking ID and annual targets.[240] Energy Safety also required PacifiCorp to update the affected narrative and tables.[241]

8.4.1.1 RN-PC-26-04: PacifiCorp Response Summary

In the PacifiCorp Revision Notice Response, PacifiCorp provided clearer accountability for its system hardening efforts.[242] It separated its combined Line Rebuild (GH-01) mitigation activity into two distinct, trackable mitigation activities, each with respective targets:

- GH-01 – Line Rebuild – Covered Conductor Installation.

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[239] Revision Notice for the PacifiCorp 2026-2028 Base WMP.

[240] WMP Guidelines, page 84.

[241] Revision Notice for the PacifiCorp 2026-2028 Base WMP, page 13-14.

[242] PacifiCorp Revision Notice Response, pages 26-27.

  - 2026-2028 Base WMP R0 targets: 120 circuit miles, 120, and 120.
  - 2026-2028 Base WMP R2 targets: 116 circuit miles, 118, and 116.
- GH-16 – Undergrounding of Electric Lines and/or Equipment.
  - 2026-2028 Base WMP R0 targets: n/a
  - 2026-2028 Base WMP R2 targets: 4 circuit miles, 2, and 4.

PacifiCorp subsequently updated all affected tables and the narrative sections throughout its Base WMP R2 to reflect the two mitigation activities and developed specific qualitative targets with milestones for each.[243]

8.4.1.2 RN-PC-26-04: Energy Safety Evaluation

By separating GH-01 activities into mitigation activities Line Rebuild – Covered Conductor Installation (GH-01) and Undergrounding of Electric Lines and/or Equipment (GH-16), each with distinct purposes and targets, Energy Safety finds that PacifiCorp has resolved this critical issue.

8.4.2 RN-PC-26-05. PacifiCorp Did Not Discuss Equipment Maintenance in the WMP Narrative

Energy Safety required PacifiCorp to revise its 2026-2028 Base WMP R0 to provide the required narrative for each of the types of equipment listed in Section 8.4, Equipment Maintenance and Repair of the WMP Guidelines.[244] The narrative, at a minimum, was required to discuss topics such as condition monitoring and maintenance strategy, among other topics for each equipment type listed.[245]

8.4.2.1 RN-PC-26-05: PacifiCorp Response Summary

In the PacifiCorp Revision Notice Response, PacifiCorp expanded the narrative in Section 8.4 to include the required discussion of condition monitoring, maintenance strategy, replacement and repair conditions, and failure and ignition rates for each of the 14 equipment types required by the WMP Guidelines versus referring the reader to a PacifiCorp policy document for said equipment types.

8.4.2.2 RN-PC-26-05: Energy Safety Evaluation

PacifiCorp has addressed all WMP Guideline requirements for Section 8.4, Energy Safety finds that PacifiCorp has resolved this critical issue.

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[243] PacifiCorp 2026-2028 Base WMP R2, page 167.

[244] WMP Guidelines, pages 90-91.

[245] WMP Guidelines, page 91.

8.4.3 RN-PC-26-06. PacifiCorp's Asset Inspection Quality Assurance Program Does Not Provide Targets for Each of the Six Disparate Asset Inspection Programs

Energy Safety required PacifiCorp to revise its 2026-2028 Base WMP, *Table 8-4: Grid Design, Asset Inspections, and Maintenance QA and QC Activity Targets*, to create and populate distinct rows for each of the asset inspection mitigation activities below:

- Transmission Patrol Inspections (AI-01),
- Distribution Patrol Inspections (AI-02),
- Transmission Detailed Inspections (AI-03),
- Distribution Detailed Inspections (AI-04),
- Transmission Intrusive Inspections (AI-05), and
- Distribution Intrusive Inspections (AI-06).

8.4.3.1 RN-PC-26-06: PacifiCorp Response Summary

In the PacifiCorp Revision Notice Response, PacifiCorp revised Table 8-4 to include separate population size, sample size, confidence levels, and pass rate targets for each of the six asset inspection programs listed above: distribution and transmission patrol, detailed and intrusive pole inspections.

8.4.3.2 RN-PC-26-06: Energy Safety Evaluation

By including separate and complete rows in Table 8-4 for each of the six inspection programs discussed above, versus one set of targets for all asset inspection programs, Energy Safety finds that PacifiCorp has resolved this critical issue.

8.4.4 RN-PC-26-07. Numerous PacifiCorp Grid Design, Operation, and Maintenance Quantitative Targets are Not Measurable

Energy Safety required PacifiCorp to revise *Table 8-1: Grid Design, Operation, and Maintenance Targets by Year*, for distribution infrared inspections (AI-08), transmission drone inspections (AI-09) and distribution drone inspections (AI-10) mitigation activities to provide measurable quantitative targets and update the accompanying narrative. Or, if PacifiCorp could not provide quantitative targets, it was required to provide specific and measurable qualitative targets.

Energy Safety required PacifiCorp to remove distribution pole wraps (GH-15) and transmission pole wraps (GH-15) mitigation activities from Table 8-1 and the associated narrative, as PacifiCorp did not have a definitive operational plan for these mitigation activities nor was it developing an operational plan for its pole wrap work. Energy Safety

required PacifiCorp to add language on the current state of its pole wrapping and its plans for using pole wrapping as a wildfire mitigation activity.

8.4.4.1 RN-PC-26-07: PacifiCorp Response Summary

In the PacifiCorp Revision Notice Response, PacifiCorp revised Table 8-1 to provide specific, measurable targets for transmission drone, distribution drone, and distribution infrared inspections. PacifiCorp updated the corresponding narrative to reflect the measurable targets, and removed the pole wrap activity from Table 8-1.

8.4.4.2 RN-PC-26-07: Energy Safety Evaluation

By providing specific and measurable quantitative targets for its drone (AI-09 and AI-10) and infrared inspection (AI-08) programs and updating the corresponding narrative; and removing pole wrap (GH-15) mitigation activities from Table 8-1 and the associated narrative as PacifiCorp is not in a position to provide qualitative nor quantitative targets at this time, Energy Safety finds that PacifiCorp has resolved this critical issue.

8.5 Areas for Continued Improvement for Future WMP Submissions

As discussed above, Energy Safety has identified areas pertaining to grid design, operations, and maintenance where the electrical corporation must demonstrate improvement in a future, specified WMP submission. This section sets forth the requirements for improvement.

8.5.1 PC-26B-08. Integrated Planning and Performance of Covered Conductor, Undergrounding, and Installation of System Automation Equipment

Summary: PacifiCorp's wildfire mitigation strategy relies on covered conductor installation, undergrounding, and system automation equipment deployment, yet all three mitigation activities face implementation challenges. Covered conductor targets were not met from 2021 to 2024. Targets related to undergrounding and automation equipment installations lack project planning beyond 2026. PacifiCorp attributed the delays to permitting, right-of-way acquisition, and internal ramp-up limitations for all three mitigation activities. While PacifiCorp has engaged a third-party contractor to support these efforts, PacifiCorp must provide a plan, comparison of targets versus actuals, and lessons learned to ensure progress and resolution of the delays.

Requirements: In its next Base WMP, PacifiCorp must:

- Provide a plan detailing how PacifiCorp will monitor the schedule, cost, and project execution of covered conductor, undergrouding, and system automation projects

delivered by the third-party contractors, including the specific governance and oversight structures PacifiCorp will use.

- At a minimum, the plan must include:
  - How PacifiCorp will oversee project delivery, corrective actions, and schedule and cost deviations.
  - How cost will be monitored against approved budgets.
  - How construction QA/QC programs will track performance.

- Provide a comparison table of targets versus actuals for covered conductor, undergrounding, and system automation projects for the past three years.
  - The table must include schedule and cost performance for each year. PacifiCorp must include an explanation for all variance in project schedule and cost, such as permitting, right-of-way acquisition, and construction challenges.
- Explain how PacifiCorp will use lessons learned from 2026–2028 program delivery (e.g., permitting bottlenecks, construction management challenges, contractor performance, material availability) to refine scoping, scheduling, and planning for its next Base WMP.
  - At a minimum, the lessons learned must document:
    - Permitting issues and solutions, construction challenges, and contractor performance issues.
    - Project scoping updates to improve circuit selection and contingency planning.
    - Construction schedule refinements to improve project delivery.

Discussed in: Sections 8.2.1.1, Covered Conductor Installation, 8.2.1.2, Undergrounding of Electric Lines and/or Equipment, and 8.2.1.6, Installation of System Automation Equipment.

8.5.2 PC-26B-09. Distribution and Transmission Pole Wrap Activity

Summary: PacifiCorp is currently deploying pole wraps as an interim wildfire risk mitigation strategy in areas of heightened wildfire risk but has not yet established performance targets or fully evaluated the effectiveness of this mitigation activity. PacifiCorp did not track pole wrap installation locations prior to 2025 and is currently evaluating where wraps will be most effective. PacifiCorp reported that it will prioritize pole wrap locations by using flame height modeling and cost-benefit analysis.[246]

Requirements: In its next Base WMP, PacifiCorp must:

[246] PacifiCorp 2026-2028 Base WMP R2, page 177.

- Provide locations where pole wraps were installed in 2025 and in the 2026–2028 Base WMP cycle, including:
    - Circuit ID, mileage, and HFTD/HFRA status, and
    - Whether those poles were later replaced or remain in-service with wraps.
- Discuss the evaluation criteria used to determine ideal installation locations. In addition to flame height modeling and cost-benefit analysis, PacifiCorp must consider nearby roads and egress/ingress constraints in its prioritization of installation locations. Lastly, PacifiCorp must discuss if and how it incorporates other factors such as surrounding fuels, terrain, and historical ignition data.
- Complete and summarize its evaluation of pole wrap effectiveness, including failure modes during fire exposure or high-heat events, and explain if the results of the evaluation will change PacifiCorp's inspection practices, replacement criteria, and future pole wrap use.
- Provide targets for pole wraps (GH-15) for each year of its upcoming Base WMP.

Discussed in: Section 8.2.1.3, Distribution and Transmission Pole Replacements and Reinforcements.

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

Summary: To mature its PEDS strategy, PacifiCorp is required to continue maturing its ESS enablement and assess ways to implement emerging technologies to alert PacifiCorp to grid hazards and faults, which can complement PacifiCorp's covered conductor activity. In Response to PC-25U-09, PacifiCorp stated that it does not have a quantitative assessment of the effectiveness or impact of its ESS due to its change in PEDS strategy.[247] In addition, PacifiCorp did not indicate planned evaluations or emerging grid technology pilots that other electrical corporations have implemented. [248]

Requirements: In its next Base WMP, PacifiCorp must:

- Provide the following ESS enablement data for its past four years:
    - Number of outages.
    - Duration of outages.
    - Frequency of outages per circuit.
    - Number of customers impacted.
    - Response time for outages.

[247] PacifiCorp 2026-2028 Base WMP R2, page 539.

[248] PacifiCorp 2026-2028 Base WMP R2, page 183.

- Provide the most recent annual evaluation of circuits utilizing ESS, including an evaluation of the impact on reliability, and a description of any short-term mitigation projects identified from the evaluation.
- Provide a quantitative assessment of the effectiveness and fire risk reduction due to PacifiCorp's implementation of ESS, which considers the number, duration, and frequency of outages; the number of customers impacted; the response time for outages; the number of ESS enabled devices; weather conditions; and other environmental factors.
- Provide a description of how PacifiCorp implemented best practices from peer IOUs including relay thresholds and settings used by the IOUs to increase reliability while reducing fire risk.
- Provide an emerging grid operations technologies, equipment, devices, and settings feasibility study.
    - Discuss emerging grid hardening technologies, equipment, devices, and settings that may be feasible to implement in its service territory.
    - If programs are determined to be feasible, set qualitative targets for testing, piloting, risk effectiveness evaluation, and implementation.

Discussed in: Section 8.2.1.4, Emerging Grid Hardening Technology Installations and Pilots and Section 8.3.4, PC-25U-09: Continued Monitoring of Enhanced Fire Risk (EFR) Settings.

8.5.4 PC-26B-11. Microgrids Feasibility and Implementation

Summary: PacifiCorp hired a consulting company to perform feasibility studies and planning for three microgrid projects located in the HFTD, with stated energy capacities and associated infrastructure. PacifiCorp is currently evaluating the results from the studies and unit pricing. Given the potential for microgrids to improve resiliency and reduce wildfire risk on remote, high-risk circuits, PacifiCorp must provide further planning detail and progress reporting.

Requirements: In its next Base WMP, PacifiCorp must:

- Provide its evaluation of the microgrid feasibility studies, including:
    - Technical specifications (e.g., capacity, location, associated line miles, generation type).
    - Wildfire risk reduction and load served.
    - Site-specific cost estimates.
- Provide an implementation schedule for each proposed microgrid PacifiCorp decides to implement, including permitting, procurement, interconnection, and construction milestones.
- Include any lessons learned from prior microgrid efforts and how they inform PacifiCorp's microgrid program.

Discussed in: Section 8.2.1.5, Microgrids.

8.5.5 PC-26B-12. De-energized Transmission Line Assessment and Removal

Summary: Large electrical corporations and SMJUs have de-energized but unremoved transmission lines within the HFTD for various operational reasons. These de-energized transmission line segments, especially those that run parallel to energized transmission lines, pose a potential wildfire risk due to inadvertent re-energization. Risk levels of these de-energized lines are dependent on grounding configurations, proximity to energized lines, and vegetation contact.

Large electrical corporations and SMJUs define, assess, and mitigate risk associated with these de-energized lines differently. Some electrical corporations have undertaken detailed circuit level or simulation-based studies to quantify risks, while others have not. Definitions of terms such as “de-energized,” and “abandoned” lines also vary across electrical corporations, further complicating comparisons and evaluations across electrical corporations.

PacifiCorp currently reports no de-energized transmission lines within the HFTD and its HFRA; nonetheless, PacifiCorp is reviewing all de-energized transmission lines within its service territory and is planning to update its asset management policy to include de-energized transmission lines.[249] PacifiCorp reported that there are no known de-energized lines planned for removal.[250] PacifiCorp hired a contractor to run power simulation models and provided a draft of its contractor’s technical memorandum.[251] In the draft, the contractor noted that short circuited transmission line segment may lead to lower induction risk. Therefore, in its Circuit Level Risk Assessment, PacifiCorp must report its grounding configurations and segmentations taken to reduce induction risk.[252]

To ensure large electrical corporations and SMJUs are managing wildfire risks from unremoved de-energized transmission lines, Energy Safety requires the electrical corporations to provide a terminology framework, provide a circuit level risk assessment, incorporate lessons learned from existing studies, provide a comprehensive mitigation strategy, and report its inspection and maintenance protocols for unremoved de-energized transmission lines in the HFTD.

Requirements: In its next Base WMP, PacifiCorp must:

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[249] PacifiCorp response to Data Request 7, Question 6.

[250] PacifiCorp response to Data Request 7, Question 6.

[251] Idle Line Study.

[252] PacifiCorp response to Data Request 7, Question 6.

- Collaborate with other large electrical corporations and SMJUs to submit a joint cross-utility terminology framework that establishes consistent definitions for the following:
    - De-energized transmission lines.
    - Abandoned transmission lines.
        - If the large electrical corporations' and SMJUs' definition for "abandoned transmission lines" is different from the definition in GO 95, Rule 31.6 for "permanently abandoned lines," the large electrical corporations and SMJUs must explain the difference between the two terms and their usage.[253]
    - Any other types of transmission line designations, such as "idle," that the electrical corporation uses for de-energized or no longer in use transmission lines that have not yet been removed.
- Provide a Circuit Level Risk Assessment. For de-energized, abandoned, or other similarly situated transmission circuits that are located in the HFTD, PacifiCorp must:
    - Identify potential ignition hazards such as electrostatic or electromagnetic coupling with adjacent energized lines, identify the factors that affect the risk of these hazards causing ignitions, and provide a risk analysis; and
    - Specify whether the line is grounded (single-point, multi-point, ungrounded), and how grounding configuration affects induction risk.
- Incorporate Lessons Learned from Existing Studies. The methodology for the risk assessment must include, at minimum:
    - Evaluation of grounding configurations and their impacts on fault current magnitudes (as shown in SDG&E's study "Corridor Induction Risk Assessment of Out-of-Service Transmission Lines in SDG&E HFTD" and PacifiCorp's "Idle Line Study");
    - Spatial distance between energized and de-energized lines and the orientation of line configurations (horizontal vs. vertical stacking); and
    - Sensitivity analysis on variables such as fault location, fault resistance, and line length, especially under fault-current scenarios.
- Provide a Comprehensive Mitigation Strategy. If applicable, each large electrical corporation and SMJU must provide an existing plan or develop a new plan that includes:
    - Identification of de-energized, abandoned, or other similarly situated transmission lines;

[253] GO 95, Rule 31.6.

- A decision-making process for the removal, modification of grounding configuration, or other mitigation of de-energized, abandoned, or other similarly situated transmission lines based on ignition risk; and
  - If identified de-energized transmission lines are subject for future use, describe its planned use, its grounding-configuration, and any intermittent mitigation strategies.
- Timeline for mitigation actions, including short-term and long-term activities.

- Report Inspection and Maintenance Protocols. PacifiCorp must:
  - Describe its inspection and maintenance process for de-energized, abandoned, or other similarly situated transmission circuits in the HFTD. This description must highlight any differences between the inspection and maintenance of energized versus de-energized, abandoned, or other similarly situated transmission circuits.
    - For each de-energized, abandoned, or other similarly situated transmission circuit in the HFTD, PacifiCorp must list the frequency and type of asset and vegetation inspections performed, the remediation timeframe for each priority of condition identified during inspection, and any routine maintenance performed.
    - For any de-energized, abandoned, or other similarly situated transmission circuit in the HFTD that is not subject to the same frequency and/or type of inspection, condition remediation timeframe, or routine maintenance work as similar, energized circuits, PacifiCorp must provide its decision-making process for reaching this determination.
  - Outline any planned changes to the inspection and maintenance of de-energized, abandoned, or other similarly situated transmission circuits in the HFTD.

Discussed in: Section 8.2.1.7, Line Removal in the HFTD.

8.5.6 PC-26B-13. Detailed Transmission Inspection Comparative Analysis

Summary: PacifiCorp performs less frequent detailed transmission inspections than its peer electrical corporations PG&E, SCE, and SDG&E yet demonstrate a significantly lower find rate of Level 2 conditions. While PacifiCorp's detailed inspections have demonstrated a Level 2 condition find rate of 1.54 percent, SDG&E's detailed transmission inspections have demonstrated a Level 2 condition find rate of 7.52 percent, PG&E's have demonstrated a find

rate of 19.2 percent, and SCE's have demonstrated a find rate of 5.5 percent.[254] Given that the condition of all of PacifiCorp's equipment is monitored through human visual inspections,[255] it is important that PacifiCorp's detailed transmission inspections effectively identify Level 2 conditions.

Requirements: In its next Base WMP, PacifiCorp must provide a comparative analysis of PacifiCorp's transmission drone inspections program and detailed transmission inspection program. For each type of inspection, this analysis must include, at a minimum, a description, comparison, and evaluation of:

- The training for the identification of GO 95, Rule 18-B(1)(a) Level 1, 2, and 3 conditions that are provided to the inspectors (including any contractor inspectors).[256]
- Job aids and reference material provided to the inspectors.
- Feedforward information provided to the inspectors (e.g., expected issues on assets and equipment to be inspected).
- Feedback information provided to the inspectors (e.g., quality control on performed inspections).
- The number and types of Level 1 and Level 2 conditions identified by the inspections.
    - For any condition code where the drone inspection find rate is more than 5 percent higher than the detailed distribution inspection find rate, PacifiCorp must discuss at least three potential reasons for the discrepancy and identify the most likely.
    - For any condition code where the drone inspection find rate is more than 10 percent higher than the detailed transmission inspection find rate, PacifiCorp must provide its plan to adjust its detailed transmission inspection program to better identify such findings. Adjustments may include changes to, or the creation of, training, job-aids, checklists, equipment and/or technology used for inspections. PacifiCorp must provide a brief discussion of each change. The plan must include milestones for implementation of the changes identified.
        - If PacifiCorp elects to not adjust its detailed inspection program despite a 10 percent find rate discrepancy, PacifiCorp must provide its reasoning for this decision. This reasoning must include a discussion of the impact of this condition existing unaddressed on wildfire risk, potential adjustments that would improve PacifiCorp's detailed

[254] SDG&E, PG&E, and SCE 2026-2028 WMPs, *Table 8-2: Asset Inspection Frequency, Method, and Criteria*.

[255] PacifiCorp 2026-2028 Base WMP R2 pages 220-226.

[256] GO 95, Rule 18-B(1)(a), pages I-10 to I-11.

inspection's ability to detect the condition, and the feasibility of implementing such adjustments.

Discussed in: Section 8.2.2.3, Detailed Transmission Inspections.

8.5.7 PC-26B-14. Equipment Failure Data

Summary: In its 2026-2028 Base WMP, PacifiCorp reported that it has limited information pertaining to equipment failures of the various equipment types described in Chapter III, Section 8.4 of the WMP Guidelines. However, in response to a data request, PacifiCorp reported collecting outage data that includes five equipment failure cause categories and 50 equipment components.[257] While most of the equipment components associated with CPUC reportable ignitions in 2024 are accounted for in PacifiCorp's outage data collection, there are several that are not, including guy wire, clamp, pothead, riser, service connector, and service drop.

To facilitate evaluation of PacifiCorp's equipment maintenance practices, PacifiCorp must provide historical outage data in lieu of equipment failure rates. To ensure PacifiCorp can identify potential gaps in its maintenance program, it must update its equipment failure data collection to include at minimum all components that have been linked to CPUC reportable ignitions.

Requirements: In its next Base WMP, PacifiCorp must:

- Populate a table that includes, at a minimum, the columns listed below for each distinct equipment failure outage recorded in the HFTD and HFRA from 2023 through 2026.
    - The direct cause category column must correspond to one of the four equipment failure direct causes listed in Attachment 1, provided by PacifiCorp in response to Data Request 7, Question 3.[258]
    - The component category must correspond to the equipment listed in the component column of Attachment 2, provided by PacifiCorp in response to Data Request 7, Question 3.[259] For conductor and cable, the estimated equipment count unit should be miles.

	2023	2024	2025

[257] PacifiCorp response to Data Request 7, Question 3.

[258] PacifiCorp response to Data Request 7, Question 3, Attachment 1.

[259] PacifiCorp response to Data Request 7, Question 3, Attachment 2.

Direct Cause	Component	Asset class	Number of outage events	Total estimated equipment count	Number of outage events	Total estimated equipment count	Number of outage events	Total estimated equipment count

- Establish more reliable and comprehensive equipment failure data collection processes, either through updating existing processes or establishing new processes. The established data collection process must:
    - Consider all electrical system components associated with CPUC reportable ignitions from 2014 to 2024. PacifiCorp must review the PG&E, SCE, and SDG&E Fire Ignition Data reported to the CPUC.[260]
    - Ensure all failed equipment is accurately recorded by responding personnel, whether the failure is observed because of outage response, inspection, routine maintenance, or other response.
- Provide a description of PacifiCorp's established equipment failure process including:
    - A list of all specific electrical system equipment and components that PacifiCorp will collect failure data for.
    - How PacifiCorp will ensure that equipment failures do not remain undetected or unreported.
    - How PacifiCorp ensures that events are correctly categorized as equipment failures (e.g., if a conductor is in contact with the ground, it could be the result of vegetation contact, not equipment failure).
    - How PacifiCorp will ensure that the specific equipment that failed is identified correctly (e.g., if a conductor is in contact with the ground, it could be the result of a splice, connector, or conductor failure).

Discussed in: Section 8.2.3, Equipment Maintenance and Repair.

Appendix C provides a consolidated list of areas for continued improvement and requirements.

[260] Fire Ignition Data.

9. Vegetation Management and Inspections

Chapter III, Section 9 of the WMP Guidelines requires the electrical corporation to include plans for vegetation management in its WMP. [261] The PacifiCorp 2026-2028 Base WMP met the requirements of the WMP Guidelines for this section.

9.1 Summary of Anticipated Risk Reduction

The vegetation management and inspection practices PacifiCorp described in its 2026-2028 Base WMP may reduce the risk of ignition on its system.

For instance, PacifiCorp's QA/QC mitigation activities include statistically-valid sample sizes. This makes it likely that PacifiCorp will understand the effectiveness of its vegetation management activities.[262] PacifiCorp's QA/QC findings also generate corrective actions, and initiate discussions with contractors that can drive continued improvements.[263] As such, through identification and remediation of non-conformities, and procedural adjustments, PacifiCorp's quality management will likely lower the risk of vegetation contacting energized infrastructure and generating arcs and sparks.

Additionally, PacifiCorp demonstrated continued progress by providing risk-based criteria, remediation timelines, and a plan to implement its priority tagging scheme for work locations as required by PC-23B-16: Vegetation Management Priority Tagging.[264] This improvement in work order resolution and tracking will likely reduce wildfire risk by ensuring the timely remediation of risky vegetation before it falls or grows into energized infrastructure.

Despite this progress, PacifiCorp's 90-day Priority Level 2 remediation timeline is longer than its peers.[265] To address this difference, Energy Safety provides additional requirements within Section 9.5.3, PC-26B-17: Priority Tagging Alignment.

To further mature its WMP, PacifiCorp must also improve its wood and slash management recordkeeping and improve its procedures to mitigate operational risks when wildfire weather approaches.

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[261] Pub. Util. Code §§ 8386(c)(3), (9).

[262] PacifiCorp 2026-2028 Base WMP R2, pages 326-327.

[263] PacifiCorp, 2026-2028 Base WMP R2, page 330.

[264] Decision for PacifiCorp 2025 WMP Update, page 70; PacifiCorp 2026-2028 Base WMP R2, pages 332-333.

[265] Bear Valley 2026-2028 Base WMP R1, page 222; Liberty 2026-2028 Base WMP R1, page 213; PacifiCorp, 2026-2028 Base WMP R2, page 333.

9.2 Discussion

This section discusses Energy Safety's evaluation of the vegetation management and inspections section of the PacifiCorp 2026-2028 Base WMP.

9.2.1 Pole Clearing

PacifiCorp demonstrated continued progress related to pole clearing. Specifically, PacifiCorp:

- Increased its annual pole clearing target for work performed in Local Responsibility Areas (LRA) from 3,126 poles in its 2023-2025 Base WMP cycle to 3,192 poles in its 2026–2028 Base WMP cycle.[266]
- Enhanced its documentation and tracking of pole clearing activities, including the identification of poles exempt from Public Resources Code (PRC) section 4292 during inspections.[267]

PacifiCorp stated that its "updated process to document/track pole clearing activities" will generate a more accurate count of inspected and worked poles.[268] Energy Safety notes that improving the documentation of poles exempt from PRC 4292 requirements will also likely increase the accuracy of PacifiCorp's records of the number of exempt and non-exempt poles in its service territory. Improved record accuracy may increase PacifiCorp's ability to locate poles that hold non-exempt equipment with heightened wildfire ignition potential and will likely improve prioritization of pole clearing activities in the highest-risk areas. This improved strategy to plan pole clearing based on exemption status is in contrast to relying on historical pole clearing records to identify poles requiring vegetation management work. The latter strategy may increase wildfire risk because non-exempt / exempt pole status often changes over time.

Energy Safety expects that PacifiCorp will utilize its improved record keeping of PRC 4292 exempt and non-exempt pole status to prioritize and schedule annual pole clearing work. Leveraging this information will help to ensure PacifiCorp's pole clearing efficiently reduces risk.

9.2.2 Wood and Slash Management

PacifiCorp's wood and slash management/debris disposal target to benchmark data collection practices with other "California utilities" demonstrates forward-looking growth.[269]

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[266] PacifiCorp 2023-2025 Base WMP R6, page 203; PacifiCorp 2026-2028 Base WMP R2, page 282.

[267] PacifiCorp 2026-2028 Base WMP R2, page 308.

[268] PacifiCorp 2026-2028 Base WMP R2, page 308.

[269] PacifiCorp 2026-2028 Base WMP R2, page 279.

Ensuring wood and slash/debris management occurred through record verification is critical because fuel accumulation increases the likelihood of wildfire ignition and spread.

Despite demonstrating forward-looking growth, PacifiCorp's wood and slash management record keeping practices, specifically how it documents and retains collected data for completed work, need improvement. In its 2026-2028 Base WMP, PacifiCorp stated that it manages wood and slash/debris at the time of pruning or removal activities, but did not indicate that it records when wood and slash management takes place.[270] Additionally, in Energy Safety's 2023 Substantial Vegetation Management Audit Report of PacifiCorp, Energy Safety found that PacifiCorp was unable to provide documentation demonstrating it managed the wood and slash/debris for each vegetation management work order it completed in 2023.[271]

Furthermore, PacifiCorp stated in a data request response that it records limited information regarding the management of wood and slash/debris using its mobile data management software (MDMS), and that the software is not set up to record completed wood and slash/debris management actions.[272] Without documenting the completion of wood and slash/debris management for each vegetation management work order, PacifiCorp cannot verify that it manages debris consistent with its 2026-2028 Base WMP commitments or demonstrate its performance during the 2026-2028 Base WMP cycle.

Additionally, the Energy Safety Data Guidelines require that each electrical corporation report how it manages the wood and slash/debris of its vegetation management activities.[273] Specifically, electrical corporations are required to populate the "SlashManagement" and "WoodDestination" fields for each vegetation management project point, line, or polygon it submits as part of quarterly spatial data submissions. These fields were not populated in PacifiCorp's latest spatial data submission to Energy Safety.[274]

Improper management of wood and slash/debris generated during vegetation management activities can increase vegetative fuel loads and, consequently, wildfire ignition and spread potential. Therefore, PacifiCorp must document when and where it completes these activities so that Energy Safety is able to verify that PacifiCorp mitigated risks associated with wood and slash/debris.

PacifiCorp must report on its benchmarking with other IOUs and on record keeping enhancements that it has implemented to document the completion of wood and

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[270] PacifiCorp 2026-2028 Base WMP R2, page 310.

[271] 2023 Substantial Vegetation Management Audit Report of PacifiCorp, pages 7-9.

[272] PacifiCorp response to Data Request 12, Question 1.

[273] Data Guidelines v4.01, pages 87-88, 93, 97-98.

[274] PacifiCorp 2025 Q4 Spatial Data Status Report.

slash/debris management actions. See Section 9.5.1, PC-26B-15: Enhancing Wood and Slash Management Recordkeeping.

9.2.3 Defensible Space

PacifiCorp included a target to develop a hazard tree management process specifically for trees outside substation properties.[275] This may reduce the risk of trees within strike distance of substation infrastructure falling into substation equipment and generating sparks.

PacifiCorp demonstrated continued progress by developing a process to address hazard trees located outside substation properties that may pose a fall-in risk to substation infrastructure. Identifying and mitigating trees with a high likelihood of failure and potential to strike substation infrastructure will likely reduce the risk of ignition caused by vegetation contacting energized equipment at substation facilities.

9.2.4 Partnerships

PacifiCorp stated that it "recognizes the benefit of partnerships with entities, including communities, as opportunities arise, however PacifiCorp vegetation management department does not maintain formal partnerships at this time…."[276]

In subsequent WMPs, PacifiCorp should pursue formal partnerships with relevant organizations to coordinate fuels management, foster workforce development, and communicate wildfire hazards. In its forthcoming WMPs, PacifiCorp should also report on any relevant informal partnerships it maintains.

9.2.5 Activities Based on Weather Conditions

PacifiCorp's 2026-2028 Base WMP and procedures do not detail vegetation management operational changes it invokes as risky weather approaches.[277]

Energy Safety asked PacifiCorp to describe operational changes based on weather conditions that it "makes to reduce the risk of ignition from vegetation management operations (e.g., ceasing the use of spark-producing equipment, patrolling non-HFTD locations, avoiding off-road travel, etc.)."[278] PacifiCorp responded that its contractor "coordinate[s] with fire agencies to ensure compliance with changing conditions and requirements."[279] The agencies "conduct random site visits to ensure compliance with use of appropriate tools, and that fire

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[275] PacifiCorp 2026-2028 Base WMP R2, page 279.

[276] PacifiCorp 2026-2028 Base WMP R2, page 315.

[277] PacifiCorp 2026-2028 Base WMP R2, pages 315-317; PacifiCorp 2026-2028 Base WMP R1, Appendix F, Attachment 15, pages 6-7.

[278] PacifiCorp response to Data Request 4, Question 5.

[279] PacifiCorp response to Data Request 4, Question 5.

suppression equipment is on site and operational."[280] Thus, PacifiCorp relies on fire agencies to identify specific operational changes PacifiCorp must make when fire weather is approaching.[281] This dependency may delay PacifiCorp and its contractors from taking steps to reduce wildfire risk from their activities. For instance, using power tools and driving vehicles when fuel moisture content is low, winds are strong, and temperatures are high increases the probability that a spark from vegetation management operations ignites a wildfire that quickly spreads. Unlike its peer electrical corporations, PacifiCorp does not have plans to internally initiate vegetation management operational changes based on wildfire weather risk level.[282]

In contrast to PacifiCorp's vegetation management activities based on weather conditions, in Section 8.3, Grid Operations and Procedures, of its Base WMP, PacifiCorp lists operational changes it makes to hot work activities as "fire risk potential" increases from lower to higher risk: from yellow to orange to red.[283] Also in contrast, Liberty and BVES restrict vegetation management operations based on the level of risk weather conditions present.[284]

PacifiCorp must define specific risk-based operational changes to its vegetation management activities that aid in mitigating any increase in ignition risk attributable to weather. PacifiCorp must develop and implement procedures that specify risk-based operational changes to its vegetation management activities, including equipment and work restrictions, based on risk associated with weather conditions. See Section 9.5.2, PC-26B-16: Operational Modifications for Wildfire Weather.

9.2.6 Quality Assurance and Quality Control

PacifiCorp's QA/QC mitigation activities are comprehensive and demonstrate effective quality management. PacifiCorp performs quality checks of pre-inspector and tree crew work across all distribution circuit miles and most transmission circuit miles each year. PacifiCorp's QA/QC activities likely reduce wildfire risk by alerting PacifiCorp to risky vegetation remaining following vegetation management activities. Based on these QA/QC findings, PacifiCorp can then perform remediation before vegetation, that initial operations did not mitigate, contacts electrical infrastructure.

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[280] PacifiCorp response to Data Request 4, Question 5.

[281] PacifiCorp response to Data Request 4, Question 5; PacifiCorp 2026-2028 Base WMP R1, Appendix F, Attachment 15, pages 6-7.

[282] PacifiCorp 2026-2028 Base WMP R2, pages 315-317; PacifiCorp 2026-2028 Base WMP R1, Appendix F, Attachment 15, pages 6-7.

[283] PacifiCorp 2028-2028 Base WMP R2, page 273.

[284] Liberty Fire Prevention Plan, pages 8-12; BVES 2026-2028 Base WMP R1, pages 210-211.

PacifiCorp annually performs "post-audit[s]" in which it inspects for vegetation conditions that still require mitigation post-work.[285] PacifiCorp conducts post-audits of 100 percent of the circuit miles it manages each year for the following mitigation activities: Routine Distribution (Detailed), Off-Cycle Distribution (Patrol), and Off-Cycle Transmission (Patrol).[286]

PacifiCorp also performs quality control post-audits of a sample of Routine Transmission (Detailed) Tree Maintenance Work (95 percent confidence level / 5 percent margin of error), 10 percent of all Pole Clearing (PRC 4292 compliance and additional) work, and approximately 50 percent of all Substation Defensible Space work.[287]

In addition to PacifiCorp's post-audit quality control review of circuit miles to check conformance with scope and standards, PacifiCorp performs quality control mitigation activities that it calls "quality reviews."[288] These quality reviews are in-depth assessments of the work of specific contracted individuals or crews.[289] Based on the quality review findings, PacifiCorp identifies "opportunities for improvement."[290]

Overall, PacifiCorp's post-audits and quality reviews will likely reduce wildfire risk by assessing the quality of its contracted work, generating opportunities for improvement and corrective actions, and identifying risky vegetation before it threatens safety or reliability.

9.2.7 Work Orders

In describing its work order resolution process, PacifiCorp defined risk-based criteria and remediation timelines for Priority Levels 1, 2, and 3.[291] It also provided plans to update its MDMS by March 2026 to operationalize its new priority assignment scheme. This update would allow PacifiCorp to track work orders at the "work unit" level as they become past due.[292]

PacifiCorp demonstrated continued progress towards prioritizing and tracking work orders by providing risk-based criteria, remediation timelines, and a plan to implement priority tagging for work locations as required by PC-23B-16: Vegetation Management Priority

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[285] PacifiCorp 2026-2028 Base WMP R2, pages 321-322, 328.

[286] PacifiCorp Vegetation Management Quality Management Program Guidelines, page 2; PacifiCorp 2026-2028 Base WMP R2, pages 326-327.

[287] PacifiCorp 2026-2028 Base WMP R2, pages 326-327.

[288] PacifiCorp Vegetation Management Quality Management Program Guidelines, pages 1-2.

[289] PacifiCorp 2026-2028 Base WMP R2, page 321; PacifiCorp Vegetation Management Quality Management Program Guidelines, page 1.

[290] PacifiCorp 2026-2028 Base WMP R2, page 330.

[291] PacifiCorp 2026-2028 Base WMP R2, pages 332-333.

[292] PacifiCorp stated in Data Request 14, Question 3 that "work unit" and "work location" are synonymous.; PacifiCorp 2026-2028 Base WMP R2, pages 332-333, 453.

Tagging.[293] PacifiCorp's continued progress will likely reduce wildfire risk by ensuring the timely remediation of risky vegetation before it falls into or grows into energized infrastructure.

9.2.7.1 PacifiCorp's Priority Level 2 Condition Timeline Demonstrates Progress but May Increase Wildfire Risk

For Priority Level 2 conditions, PacifiCorp initially described a six-month remediation timeline in a July 18, 2025, data request response. In its 2026-2028 Base WMP R2, PacifiCorp committed to remediating Priority Level 2 conditions within 90 days.[294] Compared to its initial six-month timeline, a 90-day timeline demonstrates continued progress towards striving to remediate vegetation before it grows or falls into electrical infrastructure.[295]

Despite this progress, PacifiCorp's 90-day timeline to remediate Priority Level 2 condition vegetation may be too long to effectively reduce risk.[296] During relatively fast plant growth rates in the spring and early summer, vegetation that is already within GO 95 regulatory compliance distances at the time of pre-inspection may rapidly encroach upon and contact electrical infrastructure within the 90-day remediation timeline.[297] Similarly, during winter storms vegetation that presents a Priority Level 2 fall-in risk and remains unmitigated for 90 days may fall into electrical infrastructure prior to remediation.

Furthermore, as Table 9-1, below, reveals, PacifiCorp's 90-day remediation timeline for Priority Level 2 conditions is longer than the 30-day timeline its peers commit to.[298] Given its peers' shorter Priority Level 2 remediation timeline, it is essential that PacifiCorp align with its peers to ensure its priority tagging scheme will limit wildfire risk.

To address these concerns, Energy Safety requires PacifiCorp to align its priority tagging scheme with its peers. See Section 9.5.3, PC-26B-17: Priority Tagging Alignment.

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[293] Decision on PacifiCorp's 2025 WMP Update, page 70; PacifiCorp 2026-2028 Base WMP R2, pages 332-333.

[294] PacifiCorp defines Priority Level 2 condition vegetation as "any observed tree or vegetation, or part thereof, that has encroached within regulatory or PacifiCorp mandated clearance distances or is likely to fail and impact electrical infrastructure."; PacifiCorp 2026-2028 Base WMP R2, page 333.

[295] PacifiCorp response to Data Request 1, Question 4.

[296] PacifiCorp 2026-2028 Base WMP R2, page 333.

[297] GO 95, Rule 35.

[298] Bear Valley 2026-2028 Base WMP R1, page 222; Liberty 2026-2028 Base WMP R1, page 213.

Table 9-1.[299]
Priority Condition Timelines and Documentation differ between Bear Valley, Liberty, and PacifiCorp.[300]

	Bear Valley		Liberty		PacifiCorp	
Condition / Priority	**Sub-transmission**	**Distribution**	**Transmission**	**Distribution**	**Transmission**	**Distribution**
Level 1 Timeline	4 hours	4 hours	24 hours	24 hours	24 hours	24 hours
Level 1 Criteria	Yes	Yes	Yes	Yes	Yes	Yes
Level 2 Timeline	30 days	30 days	30 days	30 days	90 days	90 days
Level 2 Criteria	Yes	Yes	Yes	Yes	Yes	Yes
Level 3 Timeline	"Normal Cycle"[301]	"Normal Cycle"	9 months	9 months	180 days	180 days
Level 3 Criteria	Yes	Yes	Yes	Yes	Yes	Yes
All Timelines and Criteria in SOPs?[302]	Yes	Yes	Yes	Yes	No	No[303]
All Timelines and Criteria in WMP?	No	No[304]	Yes	Yes	Yes	Yes

[299] Table 1 demonstrates that PacifiCorp's 90-day remediation timeline for Priority Level 2 conditions is longer than Bear Valley and Liberty's 30-day timeline. Table 1 also shows differences in Priority Level 1 and 3 remediation timelines between the three electrical corporations that are unlikely to affect wildfire risk. Note that only Liberty includes risk-based criteria and remediation timelines for all Priority Levels in both its standard operating procedures and WMP.

[300] Bear Valley RFP VM Services, page 5; Bear Valley VM and Vegetation QA/QC Programs, page 7; Bear Valley 2026-2028 Base WMP R1, pages 221-222; Liberty Vegetation Threat Procedure, pages 2-3; Liberty 2026-2028 Base WMP R1, pages 213-214; PacifiCorp 2026-2028 Base WMP R1, Appendix F, Attachment 15, pages 10, 39, 41; PacifiCorp 2026-2028 Base WMP R2, pages 332-333.

[301] In Bear Valley's response to Data Request 12, Question 1 it states that "normal cycle" Level 3 Condition vegetation may remain unmitigated "for over two years or until the routine clearing work is initiated." However, on page 185 of Bear Valley's 2026-2028 Base WMP R1, it states that Level 3 Condition fall-in-risk vegetation has a "resolution timeframe" of one year.

[302] SOPs: standard operating procedures.

[303] PacifiCorp's SOP is not consistent with its WMP as of its 2026-2028 Base WMP R2 submission.

[304] Bear Valley excluded the 4-hour Priority Level 1 remediation timeline in its SOP from its WMP.

9.2.7.2 PacifiCorp's Work Order Resolution Plans Include Equivocating Language

Although PacifiCorp demonstrated continued progress in developing its priority tagging scheme, PacifiCorp would be able to demonstrate better forward-looking growth if it removes language that attenuates its commitment to the risk-based criteria, remediation timelines, and work order tracking. For instance, PacifiCorp stated:[305]

- It does not have a formal system to track open work orders and this "**may change**" once it updates its MDMS.
- Its process of completing open work orders "**is expected** to change with implementation of PacifiCorp's updated MDMS in 2026."
- That "**in general**" it will identify and complete work within the same calendar year, and that for work it does not complete in the current calendar year it will "**generally**" complete the following year.
- It may "**adjust**" priority level definitions and timeframes as it gains experience implementing its new priority tagging scheme.
- It "**plans**" to be able to determine work unit past due status.

Energy Safety previously noted the pervasiveness of equivocating language in WMPs, concluding that its presence dilutes commitment from electrical corporations.[306]

Energy Safety expects PacifiCorp to:

- Retain risk-based criteria and remediation timelines that are comparable to those within its 2026-2028 Base WMP.[307]
- Update its MDMS, as PacifiCorp stated it plans to do, so PacifiCorp will have the ability to identify and track the remediation of work orders that have become past due.[308]

Overall, PacifiCorp's plans to prioritize work order resolution within GO 95, Rule 18-B(1)(a) time periods will reduce the likelihood that vegetation encroaches upon electrical infrastructure.[309] This will decrease wildfire risk by limiting the prevalence of arcs and sparks that occur when vegetation grows close to energized infrastructure and that generate ignitions. However, as discussed above, to demonstrate further continued progress PacifiCorp must commit to remediation timelines that align with its peers.

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[305] PacifiCorp 2026-2028 Base WMP R2, pages 331-332.

[306] Revision Notice for the SCE 2026-2028 Base WMP, pages 11-13; WSD-002, pages 26-27.

[307] PacifiCorp 2026-2028 Base WMP R2, pages 332-333.

[308] PacifiCorp 2026-2028 Base WMP R2, pages 332-333.

[309] GO 95, Rule 18-B(1)(a), pages I-10 to I-11.

9.3 Previous Areas for Continued Improvement

In the Energy Safety Decision for the PacifiCorp 2025 WMP Update, Energy Safety identified areas related to vegetation management and inspections where PacifiCorp must continue to improve its wildfire mitigation capabilities. This section summarizes the requirements imposed by those areas for continued improvement, PacifiCorp's response to those requirements, and Energy Safety's evaluation of the response.

9.3.1 PC-23B-16. Vegetation Management Priority Tagging

For this area for continued improvement, Energy Safety required PacifiCorp to provide risk-based criteria for determining and assigning priority to work locations, including remediation timelines for each priority level and a plan to operationalize risk-based criteria that includes specific, measurable, relevant, and timebound milestones in its 2026-2028 Base WMP.[310]

9.3.1.1 PC-23B-16: PacifiCorp Response Summary

In its initial 2026-2028 Base WMP R0 submission, PacifiCorp stated that it would develop a work prioritization process to incorporate within its MDMS, with a target completion in 2027.[311] However, PacifiCorp did not present priority levels nor associated time periods for corrective action, as required.[312]

9.3.1.2 PC-23B-16: Energy Safety Evaluation

PacifiCorp's continued failure to meet the requirements of PC-23B-16 resulted in Revision Notice critical issue RN-PC-26-08.[313]

In the narrative within its 2026-2028 Base WMP R2 and Revision Notice Response, PacifiCorp identified risk-based criteria for priority assignment, indicated that it would assign each work location a priority level,[314] and provided remediation timelines for each priority level.[315] PacifiCorp stated that it will update its MDMS by March 2026 to operationalize priority assignment and the new functionality will allow PacifiCorp to track work orders at the work

[310] Decision for PacifiCorp 2025 WMP Update, page 70.

[311] PacifiCorp 2026-2028 Base WMP R0, page 436.

[312] PacifiCorp 2026-2028 Base WMP R0, pages 519-520.

[313] PacifiCorp Revision Notice Response, pages 21-23.

[314] PacifiCorp stated in its response to Data Request 14, Question 3 that "work unit" (a term it uses in its WMP) and "work location" (the term it also uses in its WMP) are synonymous.

[315] PacifiCorp 2026-2028 Base WMP R2, pages 332-333.

location level as they become past due.[316] PacifiCorp's Revision Notice Response and changes to its 2026-2028 Base WMP R2 have satisfied all the requirements of PC-23B-16.[317]

As such, PacifiCorp sufficiently responded to this area for continued improvement. No further reporting is required for this area for continued improvement.

9.4 Revision Notice Critical Issues

Energy Safety issued PacifiCorp a Revision Notice for its 2026-2028 Base WMP. This section evaluates PacifiCorp's response to that Revision Notice as it relates to vegetation management and inspections.[318]

9.4.1 RN-PC-26-08. PacifiCorp Does Not Prioritize Vegetative Work or Track Remediations, Leaving Vegetation Close to Energized Infrastructure Unremediated Because of Open Work Orders

Energy Safety required PacifiCorp to provide remediation timelines and a plan with specific, time-bound, and auditable milestones. Energy Safety also required PacifiCorp to correspondingly modify its enterprise system targets for mitigation activities: "Implement new vegetation management work management software" and "Vegetation Management and Inspections: Develop work prioritization to incorporate within MDMS."[319]

9.4.1.1 RN-PC-26-08: PacifiCorp Response Summary

In the PacifiCorp Revision Notice Response, PacifiCorp provided the following:[320]

- Remediation timelines for Priority Level 1, 2, and 3 conditions consistent with Data Request 1, Question 4, and Data Request 4, Question 1.[321]
- Plans to develop and then operationalize risk-based criteria for determining and assigning priority levels to work locations.[322, 323]

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[316] PacifiCorp 2026-2028 Base WMP R2, *Table 12-1: Enterprise Systems Targets*, see ES-05 and ES-07, page 453.

[317] PacifiCorp Revision Notice Response, page 22; and PacifiCorp 2026-2028 Base WMP R2, pages 539-540.

[318] PacifiCorp Revision Notice Response, pages 22-25 and 31-32.

[319] Revision Notice for the PacifiCorp 2026-2028 Base WMP, page 23.

[320] PacifiCorp Revision Notice Response, page 23.

[321] PacifiCorp 2026-2028 Base WMP R2, pages 332-333.

[322] PacifiCorp uses "work unit" to describe "work locations" (PacifiCorp response to Data Request 14, Question 3).

[323] PacifiCorp 2026-2028 Base WMP R2, page 453.

- Plans to update its MDMS to allow inspectors to assign priority-based remediation timelines to specific work locations.[324]
- Plans to determine past due work order status by comparing a work unit's identification date to its priority-based remediation timeline.[325]

PacifiCorp also modified two mitigation activities, Implement New Vegetation Management Work Management Software (ES-05) and Vegetation Management and Inspections: Develop Work Prioritization to Incorporate Within MDMS (ES-07), by committing to "complete" and "finalize and implement," respectively, these qualitative targets by March 2026.[326]

9.4.1.2 RN-PC-26-08: Energy Safety Evaluation

PacifiCorp provided the required remediation timelines and a plan with specific, time-bound, and auditable milestones as required in PC-23B-16 and reflected in RN-PC-26-08. It provided the required modifications to Table 12-1.

Energy Safety finds that PacifiCorp has resolved this critical issue.

9.5 Areas for Continued Improvement for Future WMP Submissions

As discussed above, Energy Safety has identified areas pertaining to vegetation management and inspections where the electrical corporation must demonstrate improvement in a future, specified WMP submission. This section sets forth the requirements for improvement.

9.5.1 PC-26B-15. Enhancing Wood and Slash Management Recordkeeping

Summary: PacifiCorp described its wood and slash/debris management as actions that it will implement throughout its 2026-2028 Base WMP cycle to address vegetative material that is generated by conducting its vegetation management work.[327] However, PacifiCorp's data management software does not record when wood and slash/debris management actions are completed. Consequently, PacifiCorp cannot provide documentation verifying completion or identifying the type of wood and slash management that it performed.

Requirements: In its next Base WMP, PacifiCorp must:

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[324] PacifiCorp 2026-2028 Base WMP R2, page 332.

[325] PacifiCorp 2026-2028 Base WMP R2, page 333.

[326] PacifiCorp 2026-2028 Base WMP R2, page 453.

[327] PacifiCorp 2026-2028 Base WMP R2, pages 308-311.

- Provide the results from the benchmarking activities performed pursuant to PacifiCorp's Wood and Slash Management/Debris Disposal (VM-12) target during the 2026-2028 Base WMP cycle. The results must discuss:
  - Similarities and differences that were found between each participating IOU.
  - Any actions that PacifiCorp chose to implement as a result of the benchmarking activities.
- Describe record keeping enhancements that PacifiCorp has implemented to document and verify completion of wood and slash/debris management actions for each completed vegetation management work order in its tracking system. These enhancements may include the addition of new fields in PacifiCorp's mobile data management software to record the type of wood and slash/debris management performed (e.g., lopping, chipping, removal) and the date such actions were completed for each work order.

Discussed in: Section 9.2.2, Wood and Slash Management.

9.5.2 PC-26B-16. Operational Modifications for Wildfire Weather

Summary: PacifiCorp stated in its 2026-2028 Base WMP that fire weather conditions trigger operational changes.[328] However, unlike its peer electrical corporations, PacifiCorp does not have plans to internally initiate vegetation management operational changes based on wildfire weather risk level.[329]

Requirements: In its next Base WMP, PacifiCorp must use its Fire Potential Index (FPI) or another measure of fire weather risk to define specific operational changes for its vegetation management activities. These changes must become increasingly restrictive as wildfire risk increases (e.g., when weather causes its service territory or a portion of its service territory to increase from low to moderate to high wildfire risk).[330] In providing its response to this area for continued improvement, PacifiCorp should review, as examples, Liberty's "Fire Prevention Plan for Overhead Electric Facilities" and PG&E's "Wildfire Mitigation Matrix" in Attachment 1 of its Utility Standard: TD-1464S.[331]

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[328] PacifiCorp 2026-2028 Base WMP R2, page 316.

[329] PacifiCorp 2026-2028 Base WMP R2, pages 316-317; PacifiCorp 2026-2028 Base WMP R1, Appendix F, Attachment 15, pages 6-7.

[330] PacifiCorp indicates it uses four categories to describe district-level wildfire risk: "Little to No Wildfire Risk," "Elevated Wildfire Risk," "Significant Wildfire Risk," and "Extreme Wildfire Risk." PacifiCorp 2026-2028 Base WMP R2, page 390.

[331] Liberty Fire Prevention Plan for Overhead Electric Facilities, pages 8-12; PG&E Utility Standard: TD-1464S, Attachment 1.

PacifiCorp must incorporate into its WMP and standard operating procedures its plans for vegetation management operational changes as wildfire weather risk increases. At a minimum these plans must address:

- Tools that are likely to produce sparks (e.g., chainsaws, chippers, weed eaters, mowers, etc.).
- Vehicle use that may produce sparks or heat (e.g., driving or parking on unpaved roads, pulling equipment, etc.).
- Mitigation activities by location and initiative (e.g., differentiate operational changes for inspections, pruning and removal, pole clearing, etc. that occur in the HFTD as compared to the non-HFTD).
- How it will communicate to vegetation management employees the level of operational restrictions in place due to weather conditions.

Discussed in: Section 9.2.5, Activities Based on Weather Conditions.

9.5.3 PC-26B-17. Priority Tagging Alignment

Summary: In its 2026-2028 Base WMP, PacifiCorp provided risk-based criteria that will allow it to determine and assign priority to work locations. However, for Priority Level 2 condition vegetation that it identifies, PacifiCorp stated that it will, within 90 days, remediate vegetation that is within internal or regulatory compliance distances or is likely to fall into electrical infrastructure. This timeline does not align with PacifiCorp's peers, who target remediation of similar vegetation conditions within 30 days.

Requirements: In its next Base WMP, PacifiCorp must:

- Align its remediation timeline for Priority Level 2 condition vegetation with its peers, or justify why it has not aligned its remediation timeline for Priority Level 2 condition vegetation with its peers.
- Provide an updated version of PacifiCorp's "Transmission and Distribution Vegetation Management Program Standard Operating Procedure" that reflects its response to RN-PC-26-08 and the changes it describes in response to this area for continued improvement.[332]

Discussed in: Section 9.2.7, Work Orders.

Appendix C provides a consolidated list of areas for continued improvement and requirements.

[332] PacifiCorp 2026-2028 Base WMP R2, pages 332-334.

10. Situational Awareness and Forecasting

Chapter III, Section 10 of the WMP Guidelines requires the electrical corporation to include plans for situational awareness in its WMP. [333, 334] The PacifiCorp 2026-2028 Base WMP met the requirements of the WMP Guidelines for this section.

10.1 Summary of Anticipated Risk Reduction

PacifiCorp continues to increase the number of sensors and grid monitoring devices which will likely lower ignition risk on the affected circuits and in the affected areas and allow resources to be deployed more quickly in the event of a fault condition. For example, the communicating faulted circuit indicator (cFCI) system provides a means for rapid fault location and repair. In addition, all of PacifiCorp's cameras operate with artificial intelligence (AI) software. Further, PacifiCorp's fire simulation aide PacifiCorp once a possible ignition is detected. The data is coupled with asset data to inform wildfire risk.

PacifiCorp's FPI model will likely further reduce risk. The FPI model quantifies the potential for large wildfires several days in advance based on weather, fuels, and terrain inputs. The model gathers this information i from weather research and forecasting analysis, satellite data, and other environmental data. PacifiCorp's FPI model provides the ranges needed to make decisions for both operational and PSPS planning.

10.2 Discussion

This section discusses Energy Safety's evaluation of the situational awareness section of the PacifiCorp 2026-2028 Base WMP.

10.2.1 Environmental Monitoring Systems

PacifiCorp exhibited a thorough operational plan for the utilization of its portable weather stations, both for increased observations during extreme weather events and as a back-up in case its other stations become disabled or need to be removed for maintenance.

For example, PacifiCorp owns and operates a network of weather stations (MicroStations, remote automated weather station, and portable stations), most of which provide ten-minute observations.[335] PacifiCorp plans on installing nine additional weather stations during the

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[333] Pub. Util. Code §§ 8386(c)(2)-(5).

[334] WMP Guidelines, pages 125-139.

[335] PacifiCorp 2026-2028 Base WMP R2, pages 344-345.

2026-2028 Base WMP cycle as part of the Expansion of Weather Station Network (SA-01) mitigation activity.[336]

In addition, PacifiCorp deploys the portable weather stations in the events of extreme weather conditions, in high priority areas to increase forecast granularity, and as back-up stations in the event of fixed station outages.[337]

Overall, PacifiCorp has a solid environmental monitoring system in place to capture granular changes in the weather. PacifiCorp demonstrated maturity by adding nine more weather stations, providing further coverage for its California service territory.[338]

10.2.2 Grid Monitoring Systems

PacifiCorp demonstrated continued maturity by increasing its number of grid monitoring sensors and devices, which will likely lower the potential risk of ignition on the monitored circuits and in the monitored areas. For example, the cFCI system provides a rapid fault location and repair thereby decreasing outage time. PacifiCorp operates 480 distribution cFCI devices at 195 sites across its California service territory.[339] These sensors are embedded with communications modules cFCl alarms triggered by an event are used in zone-based fault locating, which allow for faster locating and repair of the fault.[340]

In addition, PacifiCorp proactively deployed 19 early fault detection (EFD) sensors, monitoring approximately 60-circuit miles of 69kV sub-transmission lines, and plans to add an additional EFD sensor in 2025 for a total of 20.[341] EFD sensors allow for early fault detection and inspection. Corrective measures taken in response to EFD alarms have the potential to prevent faults and reduce an associated ignition risks.[342]

PacifiCorp's grid monitoring system is at a maturity level consistent with the size of its service territory.

10.2.3 Ignition Detection Systems

PacifiCorp utilizes eight high-definition cameras across its California service territory to provide real-time early ignition detections.[343] The cameras rotate 360 degrees and are

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[336] PacifiCorp 2026-2028 Base WMP R2, page 343.

[337] PacifiCorp 2026-2028 Base WMP R2, pages 345-346.

[338] PacifiCorp 2026-2028 Base WMP R2, page 343.

[339] PacifiCorp 2026-2028 Base WMP R2, page 352.

[340] PacifiCorp 2026-2028 Base WMP R2, pages 352-353.

[341] PacifiCorp 2026-2028 Base WMP R2, page 354.

[342]PacifiCorp 2026-2028 Base WMP R2, page 355.

[343] PacifiCorp 2026-2028 Base WMP R2, page 363

equipped with AI software to detect emerging ignitions as well as using near-infrared to assist with nighttime detections.[344]

In addition, PacifiCorp's two fire simulation models are used to provide information on current and near-term weather forecasts and help PacifiCorp to better understand the impacts of potential ignitions, compare forecast conditions to historical conditions, identify where the current risk is, and project out the greatest consequence prior to a wildfire.[345]

PacifiCorp's fire simulation modeling provides a solid method for detection, and tools to inform PacifiCorp once a possible ignition is detected.[346] The data provided prior to any wildfire, give PacifiCorp the ability to understand potential impacts should an ignition occur by Allowing PacifiCorp to track seasonal changes in fuel conditions and dryness. The information provides an insight to the conditions across PacifiCorp's service areas and the seasonal changes that affect burning conditions.

PacifiCorp's ignition detection system is at a similar maturity level to the other electrical corporations.

10.2.4 Weather Forecasting

PacifiCorp was unable to provide a percentage of weather station outage, as required by the WMP Guidelines.[347] However, PacifiCorp stated that it "is investigating the best methodology for determining what is an acceptable amount of weather station downtime."[348] Energy Safety recommends that PacifiCorp provide the results of its investigation in its next Base WMP.

If weather station data is not available during a PSPS event, PacifiCorp will look for alternatives to ensure there is adequate weather station coverage, including requesting the weather station vendor expedite maintenance, deploying portable weather stations, or using publicly available weather stations data from other organizations.[349]

PacifiCorp has developed an informative and easy to navigate public-facing website to share both weather and fuel moisture information. This website utilizes multiple weather forecasting models and allows the user to view real-time weather information at both an individual station and across the entire PacifiCorp service area.[350] This clarity not only

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[344] PacifiCorp 2026-2028 Base WMP R2, page 363.

[345] PacifiCorp 2026-2028 Base WMP R2, pages 364-365.

[346] PacifiCorp response to Data Request 18, Question 3.

[347] WMP Guidelines, page 136.

[348] PacifiCorp response to Data Request 3, Question 5.

[349] PacifiCorp 2026-2028 Base WMP R2, page 387.

[350] PacifiCorp 2026-2028 Base WMP R2, page 376; StormGeo Weather Awareness System.

provides the user with knowledge of what is occurring across the area but also provides some transparency of the operational activities (e.g. PSPS, work stoppage, etc.) occurring.

10.2.5 Fire Potential Index

PacifiCorp's FPI is consistent with the other California IOUs and provides the ranges needed to make decisions for both operational and PSPS planning.

PacifiCorp's FPI takes a variety of different inputs to provide a comprehensive analysis of the fire potential across its service territory at a 30-meter resolution. The variables include inputs including fuels, terrain, wind, and aridity.[351] The FPI ranking is broken down into six ranges (very low, low, moderate, high, very high, and extreme) allowing for greater decision-making ability.[352]

PacifiCorp's FPI model quantifies the potential for large or consequential wildfires several days in advance based on weather, fuels, and terrain inputs. This information is gathered from weather research and forecasting analysis, satellite derived hotspot data, and other environmental data.[353]

10.3 Areas for Continued Improvement

Energy Safety identifies no previous or new areas for continued improvement in the situational awareness and forecasting section for the PacifiCorp 2026-2028 Base WMP.

[351] PacifiCorp 2026-2028 Base WMP R2, page 388.

[352] PacifiCorp response to Data Request 3, Question 7.

[353] PacifiCorp 2026-2028 Base WMP R2, page 394.

11. Emergency Preparedness, Collaboration, and Community Outreach

Chapter III, Section 11 of the WMP Guidelines requires the electrical corporation to provide an overview of its emergency plan and describe its communication strategy with public safety partners, essential customers, and other stakeholder groups regarding wildfires, outages due to wildfires, and PSPS and service restoration.[354] The PacifiCorp 2026-2028 Base WMP met the requirements of the WMP Guidelines for this section.

11.1 Discussion

This section discusses Energy Safety's evaluation of the emergency preparedness, collaboration, and public awareness section of the PacifiCorp 2026-2028 Base WMP.

11.1.1 Emergency Preparedness and Recovery Plan

PacifiCorp was proactive in establishing its Wildfire and Emergency Response Team. Its creation stems from PacifiCorp's 2024 lesson learned that its "Emergency Preparedness external communications relationships need to be bolstered to improve real time ability to coordinate due to the 90 counties it serves in six states."[355] PacifiCorp provided examples of 2025 activities in Siskiyou County that demonstrated the value of its newly established team, which demonstrate the team's impact to real-time emergency management relationships.[356] For example:

- Real-Time Coordination provided by acting as liaisons during emergencies to ensure timely, accurate exchange of information with local, state, and federal agencies.
- Incident Command participation by embedding personnel within Incident Command System structures to align PacifiCorp's operational actions with broader emergency response objectives.
- Preparedness and relationship building by conducting pre-season planning, and after-action reviews to strengthen trust and improve collaborative response capabilities.

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[354] Pub. Util. Code § 8386(c)(7), (11), (16), (19)-(21).

[355] PacifiCorp response to Data Request 13, Question 4.a, revised.

[356] PacifiCorp response to Data Request 13, Question 4.a, revised.

Further, PacifiCorp exhibited maturity in establishing its Wildfire Intelligence Center (WIC) in May 2025 to address the growth in wildfire and wildfire risk.[357] PacifiCorp collaborated with PG&E, SCE, and SoCal Gas to model its WIC after the utilities best practices and insights.[358] As PacifiCorp stated, "PacifiCorp incorporates similar core elements: a dedicated watch-office structure staffed by specialists with wildfire and geographic information system (GIS) expertise; high-definition camera systems with AI-based smoke detection; structured analytical tools such as fire-spread modeling and threat-severity matrices; and strong coordination with dispatch agencies."[359] The WIC has recently begun to provide 24/7 monitoring of hazards that threaten company equipment with a focus on wildfire.[360] PacifiCorp cited the development of its new WIC as a 2024 lesson learned.[361] PacifiCorp's establishment of its WIC demonstrated the importance of aligning with best practices used by other similar electrical corporations.

11.1.2 External Collaboration and Coordination

In 2024, PacifiCorp established its PSP portal, its public safety partner portal.[362] While PacifiCorp has limited experience with PSPS events in California, the implementation of a public safety partner portal demonstrates a commitment to keeping community partners informed during PSPS events. PacifiCorp seeks to implement security improvements by 2027 and reporting improvements by 2028.[363]

PacifiCorp's collaboration with public safety and emergency management partners is reflected in mitigation activity Western Wildfire Communications Workshop (CO-04). Through this activity PacifiCorp meets with communications teams from western utilities in the United States and Canada to discuss wildfire communications.[364] The electric utility partners meet twice a year (pre-wildfire season and post-season) to learn from each other on improving communications for wildfire.[365] PacifiCorp's target is to participate in both workshops annually.[366] The key gap in its communication coordination with public safety partners

[357] PacifiCorp 2026-2028 Base WMP R2, page 407; PacifiCorp response to Data Request 13, Question 3.b.

[358] PacifiCorp 2026-2028 Base WMP R2, page 408.

[359] PacifiCorp response to Data Request 13, Question 3.a.

[360] PacifiCorp 2026-2028 Base WMP R2, page 408; PacifiCorp response to Data Request 13, Question 3.b.

[361] PacifiCorp 2026-2028 Base WMP R2, page 461.

[362] PacifiCorp 2026-2028 Base WMP R2, page 418.

[363] PacifiCorp 2026-2028 Base WMP R2, page 397.

[364] PacifiCorp 2026-2028 Base WMP R2, page 533.

[365] PacifiCorp response to Data Request 16, Question 1.a.

[366] PacifiCorp 2026-2028 Base WMP R2, page 397.

("Feedback on PSPS Playbook"[367]) is not reflected as a 2026-2028 Base WMP target in Table 11-1. Energy Safety encourages PacifiCorp to develop a communications plan and set targets to strengthen the opportunity to receive the feedback it needs on its PSPS playbook.

PacifiCorp lists that it meets quarterly with its local tribes,[368] but it has no targets to enhance its collaboration and communication with the groups. Despite listing four gaps in collaborating with the Tribal Agencies.[369] As with its communication coordination with public safety partners, Energy Safety encourages PacifiCorp to develop a plan and set targets to strengthen it communication and collaboration with Tribal Agencies.

11.1.3 Public Communication, Outreach, and Education Awareness

PacifiCorp has not called a PSPS event in California since 2021. When an event is called, PacifiCorp plans to be proactive, with customer service staff calling customers on the phone who are identified as access and functional needs (AFN), including medical baseline customers.[370] While PacifiCorp conducts internal and external PSPS exercises,[371] it is essential that PacifiCorp has the ability to quickly and efficiently reach all its AFN customers given that it has not had to place its PSPS protocol into action since 2021.

PacifiCorp's web-based outage map is an important public communications effort. PacifiCorp exhibited maturity in updating its outage map based on a 2024 lesson learned.[372] Customers wanted to know why an outage was happening, whether due to ESS or de-energization.[373] The updated map went live May 2025 to show "outages related to emergency de-energization and outages related to Enhanced Safety Settings."[374]

11.2 Previous Areas for Continued Improvement

In the Energy Safety Decision for the PacifiCorp 2025 WMP Update, Energy Safety identified areas related to emergency preparedness, collaboration, and public awareness where PacifiCorp must continue to improve its wildfire mitigation capabilities. This section

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[367] PacifiCorp 2026-2028 Base WMP R2, pages 421-422.

[368] PacifiCorp 2026-2028 Base WMP R2, pages 424-425.

[369] PacifiCorp 2026-2028 Base WMP R2, page 425.

[370] PacifiCorp 2026-2028 Base WMP R2, page 437.

[371] PacifiCorp 2026 AFN Plan.

[372] PacifiCorp 2026-2028 Base WMP R2, page 461.

[373] PacifiCorp 2026-2028 Base WMP R2, page 461.

[374] PacifiCorp response to Data Request 13, Question 6.

summarizes the requirements imposed by those areas for continued improvement, PacifiCorp's response to those requirements, and Energy Safety's evaluation of the response.

11.2.1 PC-25U-10. Emergency Resources for Responding to Faults and Ignitions

For this area for continued improvement, Energy Safety required PacifiCorp to provide in its 2026-2028 Base WMP an analysis of its prevention and suppression resources throughout its California service territory.[375] This analysis required PacifiCorp to demonstrate the adequacy of its resources for preventing and responding to faults and suppressing ignitions associated with its assets, and to cite to and provide PacifiCorp's internal prevention and suppression written procedure for its field personnel.[376] PacifiCorp was required to provide a table that lists the fire prevention, suppression, and/or firefighting equipment it has available in its California service territory for fault and ignition response. [377] The table was required to provide equipment description and location information.

11.2.1.1 PC-25U-10: PacifiCorp Response Summary

In its 2026-2028 Base WMP, PacifiCorp reported that it follows Public Resources Code sections 4427 and 4428 and local United States Forest Service work practice requirements for staging prevention and suppression resources.[378] PacifiCorp's Table PAC 8-3 showed the equipment it carries or has available. Figure PAC 8-4 shows the locations of the water trailers that can be deployed.

To address the adequacy of its ignition prevention resources, PacifiCorp stated that it will evaluate "other utilities' long-standing programs to identify best practices and lessons learned, program effectiveness and cost-benefit ratios, and opportunities for cost sharing or partnership.[379] PacifiCorp has started comprehensive engagement with both California, [Berkshire Hathaway Energy] utilities, and Pacific Northwest utility partners."[380] PacifiCorp intends to complete its assessment of peer-utility approaches by the end of 2026 and produce its analysis in 2027, based on its multi-utility evaluation, and "formalize any new program elements in 2027."[381]

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[375] Decision for PacifiCorp 2025 WMP Update, pages 70-71.

[376] Decision for PacifiCorp 2025 WMP Update, page 71.

[377] Decision for PacifiCorp 2025 WMP Update, page 71.

[378] PacifiCorp 2026-2028 Base WMP R2, page 541.

[379] PacifiCorp 2026-2028 Base WMP R2, page 541.

[380] PacifiCorp 2026-2028 Base WMP R2, pages 541-542.

[381] PacifiCorp 2026-2028 Base WMP R2, pages 541-542.

11.2.1.2 PC-25U-10: Energy Safety Evaluation

The required analysis of its prevention and suppression resources throughout its California service territory was not provided. PacifiCorp is part of a large six-state utility with valuable Pacific Northwest utility partner resources, both investor-owned and publicly-owned. Evaluating its California emergency resources for responding to faults and ignitions by 2026 is a prime opportunity to utilize those resources given the similar terrain to its California service territory. As such, PacifiCorp must continue to improve in this area for its next Base WMP. Section 11.3.1 sets forth the requirements for improvement.

PacifiCorp's Table PAC 8-3 shows that the equipment its workers carry in its trucks is the same as that which is required to be carried on CAL FIRE apparatus.

11.3 Areas for Continued Improvement for Future WMP Submissions

As discussed above, Energy Safety has identified areas pertaining to emergency preparedness, collaboration, and public awareness where the electrical corporation must demonstrate improvement in a future, specified WMP submission. This section sets forth the requirements for improvement.

11.3.1 PC-26B-18. Analysis of PacifiCorp's Prevention and Suppression Resources

Summary: PacifiCorp must evaluate its field resources for fault and ignition response following a best practices analysis of its California and Pacific Northwest electric utility partners.

Requirements: In its next Base WMP, PacifiCorp must provide:

- An analysis of its prevention and suppression resources in its California service territory. This analysis must demonstrate the adequacy of its resources for preventing and responding to faults and suppressing ignitions associated with its assets.
    - This analysis must include PacifiCorp's internal prevention and suppression written procedure for its field personnel. A table (similar to *Table 7.4: List of firefighting equipment and locations* from PacifiCorp's 2022 WMP Update) that lists the fire prevention, suppression, and/or firefighting equipment it has available for use in its California service territory for fault and ignition response. This table must provide equipment description and location information.

Discussed in: Section 11.2.1, PC-25U-10: Emergency Resources for Responding to Faults and Ignitions.

Appendix C provides a consolidated list of areas for continued improvement and requirements.

12. Enterprise Systems

Chapter III, Section 12 of the WMP Guidelines requires the electrical corporation to provide an overview of inputs to, operation of, and support for various enterprise systems it uses for vegetation management, asset management and inspection, grid monitoring, ignition detection, weather forecasting, and risk assessment initiatives. [382] The PacifiCorp 2026-2028 Base WMP met the requirements of the WMP Guidelines for this section.

12.1 Discussion

This section discusses Energy Safety's evaluation of the enterprise systems section of the PacifiCorp 2026-2028 Base WMP.

PacifiCorp noted that it "does not have an enterprise system to track its risk assessment initiatives,"[383] but does have a system that accepts, stores, and updates information related to risk assessment initiatives. PacifiCorp provided an overview of its database management systems for assets and vegetation management and discussed its plans to increase its maturity by creating enterprise systems for these mitigation categories.[384] PacifiCorp also provided information on the systems it does not host by stating that "[t]he company's ignition detection and weather forecasting are hosted solutions managed by third parties."[385]

12.1.1 Risk Assessment

PacifiCorp employs a systematic, enterprise-level method to track the completion of risk model updates and related risk assessment mitigation activities. The absence of an enterprise system for risk assessment tracking limits PacifiCorp's ability to systematically integrate risk assessment-related outputs into a centralized framework and could constrain the traceability of risk data over time.

However, PacifiCorp stated that it tracks completion of risk modeling updates and related initiatives identified in *Table 5-6: Utility Risk Assessment Improvement Plan* using a cloud-based platform that follows structured workflows similar to those used for software development.[386] The platform functions as an enterprise-level system that accepts, stores, and updates information related to risk assessment initiatives and provides a structured

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[382] Pub. Util. Code § 8386(c)(10), (14), (18).

[383] PacifiCorp 2026-2028 Base WMP R2, page, 455.

[384] PacifiCorp 2026-2028 Base WMP R2, page 455.

[385] PacifiCorp 2026-2028 Base WMP R2, page 455.

[386] PacifiCorp response to Data Request-17, Question 1.

mechanism to track progress, ownership, and completion status. These features may support traceability, repeatability, and governance across the risk assessment lifecycle.

12.1.2 Assets

12.1.2.1 Asset Identification

The WMP Guidelines required PacifiCorp to describe its "process for integrating 100 percent asset identification."[387] PacifiCorp tracks its "critical" assets. If 100 percent of assets are not identified, the WMP Guidelines further require that PacifiCorp describe its "process for integrating 100 percent asset identification or its justification if not currently in place."[388] PacifiCorp stated that "Due to the dynamic character of the electric grid, however, it would be difficult to attain 100% asset identification."[389] PacifiCorp operates with four systems for asset management.[390] PacifiCorp stated that these systems "enable the company to track all assets deemed critical."[391] PacifiCorp provided a list of the 41 assets it deems critical, 22 associated with power lines and 19 associated with substations.[392] PacifiCorp stated that non-critical assets "are smaller components of a larger asset but are **not** individually tracked in any company database."[393] (Emphasis added.)

12.1.2.2 Incorrect Asset Records

PacifiCorp stated that "When asset records are found to be incorrect or incomplete, or require updates, periodic cyclical inspections identify these deficiencies, prompting updates."[394] PacifiCorp's approach to identifying and correcting asset data discrepancies relies primarily on discovery by field inspectors during inspections.[395] When inspectors identify incomplete or inaccurate asset information, PacifiCorp inspectors manually submit updates through inspection applications or forms, which are then processed to correct records in the legacy asset database system, geospatial information system, and enterprise asset management system.[396]

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[387] WMP Guidelines, page 167.

[388] WMP Guidelines, page 167.

[389] PacifiCorp 2026-2028 Base WMP R2, page 456.

[390] PacifiCorp 2026-2028 Base WMP R2, page 455.

[391] PacifiCorp 2026-2028 Base WMP R2, page 455.

[392] PacifiCorp response to Data Request 14, Question 1, Attachment.

[393] PacifiCorp response to Data Request 14, Question 1.

[394] PacifiCorp 2026-2028 Base WMP R2, page 455.

[395] PacifiCorp response to Data Request 17, Question 2.

[396] PacifiCorp response to Data Request 17, Question 2.

12.1.2.3 Asset Inspection Data

PacifiCorp conducts asset inspections multiple times per year. However, its inspection frequency varies annually and is not on a consistent quarterly or periodic basis. For example, inspections have occurred as few as once per year (e.g., 2017, 2019) and as many as three times per year (e.g., 2020, 2021, 2023, and 2025), with inspections quarters varying year to year.[397] As a result, identification of data discrepancies is dependent on when and where inspections occur rather than on a systematic, continuous data validation process. While PacifiCorp has a mechanism to capture data variances identified in the field, the process is largely manual and dependent on individual inspectors or journeymen to recognize, document, and submit corrections. This reliance on manual data entry and follow-up introduces the potential for human error, inconsistent application, and delays in updating enterprise systems. Consequently, data accuracy and completeness may vary over time.

Energy Safety recommends that PacifiCorp enhance its asset identification and data validation processes by implementing more systematic controls that reduce reliance on manual field discovery and support consistent, timely updates to enterprise asset records.

12.1.3 Vegetation Management

PacifiCorp does not use a single, integrated enterprise system to manage vegetation management activities from planning through field execution and reporting. Instead, it relies on a third-party work management system and GIS software to track vegetation management activities in the field, while using a separate database, PacifiCorp Vegetation Management (PVM), to track production metrics associated with vegetation management activities based on contractor submitted timesheets and invoices.[398]

PacifiCorp stated that there are no automated or manual data transfers between the third-party work management system and the PVM database. [399] Additionally, PacifiCorp stated that while "a formal, detailed comparison of the two datasets to reconcile inconsistencies is not currently performed, discrepancies may be identified and addressed." [400]

In its 2026-2028 Base WMP, PacifiCorp has included a target to establish a QA/QC process and procedure for reviewing data entered into its updated Mobile Data Management System (MDMS) software (ES-06).[401] Being able to accurately track vegetation management related WMP initiatives throughout the course of PacifiCorp's 2026-2028 Base WMP cycle is important so that PacifiCorp can verify the risk reduction described in its 2026-2028 Base WMP is

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[397] PacifiCorp response to Data Request 17, Question 2, Attachment.

[398] PacifiCorp response to Data Request 19, Question 1.

[399] PacifiCorp response to Data Request 19, Question 1.

[400] PacifiCorp response to Data Request 19, Question 1.

[401] PacifiCorp 2026-2028 Base WMP R2, page 453; PacifiCorp Opening Comments on the Draft Decision, pages 2-3.

achieved. Developing a formal QA/QC process for its MDMS software as described in its 2026-2028 Base WMP will likely improve the accuracy and reliability of PacifiCorp's vegetation management WMP initiative reporting and performance tracking.

Integrating its PVM database with its third-party work management system could further enhance the accuracy of PacifiCorp's PVM database and allow it to track WMP initiative progress at a more granular level. For example, Liberty utilizes Power BI software and Structured Query Language to generate reports and dashboards for WMP initiative progress based on data collected in the field using Liberty's field data collection applications.[402]

Energy Safety recommends that PacifiCorp evaluate opportunities to integrate the PVM database with its third-party vegetation management work management system and other applicable PacifiCorp enterprise systems to further improve tracking of vegetation management activities.

12.2 Previous Areas for Continued Improvement

In the Energy Safety Decision for the PacifiCorp 2025 WMP Update, Energy Safety identified areas related to enterprise systems where PacifiCorp must continue to improve its wildfire mitigation capabilities. This section summarizes the requirements imposed by those areas for continued improvement, PacifiCorp's response to those requirements, and Energy Safety's evaluation of the response.

12.2.1 PC-25U-08. Asset Management and Enterprise Systems

For this area for continued improvement, Energy Safety required PacifiCorp to demonstrate its ability to migrate its asset inventory, inspection, and maintenance data from its legacy mainframe to its new enterprise asset management (EAM) software suite in its 2026-2028 Base WMP.[403] This discussion was required to include:[404]

- Its process to migrate data across systems, including its process to maintain data integrity; and its quality control to confirm migration is complete and accurate.
- Its process to update the new enterprise asset management system to reflect assets that have changed due to hardening or repair work.

12.2.1.1 PC-25U-08: PacifiCorp Response Summary

In its 2026-2028 Base WMP, PacifiCorp reported that it retained a systems integrator to assist PacifiCorp with its systems implementations, including the migration from the legacy

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[402] Liberty 2026-2028 Base WMP R1, page 298.

[403] Decision for PacifiCorp 2025 WMP Update, page 69.

[404] Decision for PacifiCorp 2025 WMP Update, page 69.

mainframe to the new EAM software suite, and referenced the integrator's prior involvement in a 2022 substation asset management implementation.[405] PacifiCorp stated that it applies industry best practices to support data integrity, including iterative mock data loads, validation, and defect tracking. [406, 407]

PacifiCorp described an extract-transform-load methodology with pre- and post-load validation, exception reporting, and defect tracking through cloud-based platform dashboards.[408] PacifiCorp noted that full data conversion has not yet begun and that the described process is illustrative and subject to change.[409]

Further, PacifiCorp stated that it has standardized post-implementation support processes, including business verification, role-based access controls, hypercare support period, and operational issue management governed by IT change-control processes.[410]

PacifiCorp also stated that it has robust asset management processes to create and update asset information in the asset management system of record to reflect work done in the field, including updates from hardening or repair work.[411]

12.2.1.2 PC-25U-08: Energy Safety Evaluation

PacifiCorp demonstrated some progress in this area for continued improvement, but the information provided does not fully address Energy Safety's concerns. Energy Safety required PacifiCorp to discuss its ability to migrate data across systems and how the systems will reflect asset upgrades/updates.

PacifiCorp described its intended data migration, validation, and post-implementation support practices that are consistent with industry standards. However, the response remains largely conceptual, as full data conversion has not yet begun and the processes described are subject to change.[412] PacifiCorp did not sufficiently describe the systems integrator's role, end-to-end migration process, data quality thresholds, or timing for initiating full data conversion.

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[405] PacifiCorp 2026-2028 Base WMP R2, page 537.

[406] PacifiCorp 2026-2028 Base WMP R2, page 537.

[407] PacifiCorp response to Data Request 18, Question 1.

[408] PacifiCorp response to Data Request 18, Question 1.

[409] PacifiCorp response to Data Request 18, Question 1.

[410] PacifiCorp response to Data Request 18, Question 2.

[411] PacifiCorp 2026-2028 Base WMP R2, page 537.

[412] PacifiCorp response to Data Request 18, Question 1.

In addition, PacifiCorp stated that the data loaded into the production systems is verified by the business, [413] but PacifiCorp did not describe whether the verification covers all migrated assets, whether teams apply minimum quality thresholds, and whether there is any audit trail. PacifiCorp also did not describe its process for updating asset records following hardening or repair activities.

As such, PacifiCorp must continue to improve in this area for its next Base WMP. Section 12.4.1, PC-26B-19: Asset Management and Enterprise Systems sets forth the requirements for improvement.

12.3 Revision Notice Critical Issues

Energy Safety issued PacifiCorp a Revision Notice for its 2026-2028 Base WMP. This section evaluates PacifiCorp's response to that Revision Notice as it relates to enterprise systems.[414]

12.3.1 RN-PC-26-09. PacifiCorp Did Not Provide Sufficient Narrative for the Enterprise System Requirement to Discuss Its Asset Identification Process and Its Process for Integrating 100 Percent Asset Identification or a Justification for Not Having This Process in Place

The WMP Guidelines required PacifiCorp to describe its "process for integrating 100 percent asset identification."[415] However, discussion of these required elements was incomplete in PacifiCorp's 2026-2028 Base WMP R0. Therefore, Energy Safety required PacifiCorp to provide a complete narrative of its asset identification process and its process for integrating 100 percent of its asset identification into its enterprise systems, or it must justify why it does not have such a process in place.[416]

12.3.1.1 RN-PC-26-09: PacifiCorp Response Summary

In the PacifiCorp Revision Notice Response, PacifiCorp stated that it "clarif[ied] the enterprise systems used to manage PacifiCorp's assets and the processes in place to identify and correct incomplete or incorrect information in these systems."[417] PacifiCorp provided a near

[413] PacifiCorp response to Data Request 18, Question 2.

[414] PacifiCorp Revision Notice Response, pages 32-33.

[415] WMP Guidelines, page 167.

[416] WMP Guidelines, page 167.

[417] PacifiCorp Revision Notice Response, page 33.

complete rewrite of its Asset Management and Defensible Space subsection in Section 12.2. It clarified and named its four systems.[418]

PacifiCorp's Revised WMP clarified that its systems track all assets deemed "critical." PacifiCorp provided a list of the 41 types of assets it deems "critical." Further, it stated that "PacifiCorp classifies certain parts of assets as non-critical. These are smaller components of a larger asset that are not individually tracked in any company database."[419] PacifiCorp stated that achieving and maintaining 100 percent asset identification is challenging due to "the dynamic character of the electric grid."[420] PacifiCorp further stated that due to "historical lapses in data entry, there may be occasional variances between asset data in the enterprise systems and actual assets in the field.[421] PacifiCorp further stated that once such variances are identified and corrected when they become apparent, the differences are reconciled primarily through its cyclical inspection program for line assets.[422]

12.3.1.2 RN-PC-26-09: Energy Safety Evaluation

PacifiCorp's provided the required information in its revised discussion of its Asset Management and Defensible Space within Section 12.2, Summary of Enterprise Systems.

PacifiCorp described its asset identification process, including how assets deemd critical are identified, tracked, and maintained within its enterprise systems, and clarified that smaller components of larget assets are classified as non-critical and therefore not indivudally tracked.[423]

PacifiCorp also explained that vairances between enterprise system records and field assets may occur and are identified and corrected through cyclical inspection programs.[424]

Energy Safety finds that PacifiCorp has resolved this critical issue.

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[418] PacifiCorp 2026-2028 Base WMP R2, page 455.

[419] PacifiCorp response to Data Request 14, Question 1.

[420] PacifiCorp2026-2028 Base WMP R2, page 456.

[421] PacifiCorp 2026-2028 Base WMP R2, page 456.

[422] PacifiCorp Revision Notice Response, page 33.

[423] PacifiCorp Revision Notice Response, page 33.

[424] PacifiCorp Revision Notice Response, page 33.

12.4 Areas for Continued Improvement for Future WMP Submissions

As discussed above, Energy Safety has identified areas pertaining to enterprise systems where the electrical corporation must demonstrate improvement in a future, specified WMP submission. This section sets forth the requirements for improvement.

12.4.1 PC-26B-19. Asset Management and Enterprise Systems

Summary: In response to PC-25U-08, PacifiCorp did not provide sufficient details regarding its EAM implementation. Specifically, PacifiCorp did not adequately describe the processes for how its systems integrator will migrate asset inventory, inspection, and maintenance data from the legacy mainframe to the EAM system; the controls used to maintain data integrity and quality during data migration; and the processes used to update asset records in the EAM system following hardening or repair work.

Requirements: In its next Base WMP, PacifiCorp must demonstrate its ability to migrate its asset inventory, inspection, and maintenance data from its legacy mainframe to its new EAM software suite with sufficient details regarding processes, controls, and quality control. PacifiCorp must provide:

- 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.
- Its data quality thresholds or quantitative acceptance criteria used to confirm data integrity, completeness, and accuracy.
- Its timeline for when PacifiCorp expects to begin and complete the full data conversion.
- 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.
- 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.

Discussed in: Section 12.2.1.2, PC-25U-08: Energy Safety Evaluation.

Appendix C provides a consolidated list of areas for continued improvement and requirements.

13. Lessons Learned

Chapter III, Section 13 of the WMP Guidelines requires the electrical corporation to discuss the lessons learned it uses to drive continual improvement in its WMP.[425] The PacifiCorp 2026-2028 Base WMP met the requirements of the WMP Guidelines for this section.

13.1 Discussion

This section discusses Energy Safety's evaluation of the lessons learned section of the PacifiCorp 2026-2028 Base WMP.

The WMP Guidelines require electrical corporations to include a discussion "describing the key lessons learned tied to feedback from government agencies and stakeholders, collaboration efforts with other electrical corporations, areas for continued improvement, PSPS or outage events, and outcomes from previous WMP cycles."[426] In addition, electrical corporations are to "include lessons learned from prior catastrophic wildfires ignited by the electrical corporation's facilities or equipment and findings from Energy Safety compliance audits and reports."[427]

PacifiCorp's seven lessons learned were on its 2024 wildfire season, a PSPS exercise, community forums with public safety partners, an internal discussion, a customer WMP webinar, and its AFN planning.[428] PacifiCorp did not include lessons learned from Energy Safety compliance audits and reports, outage events or lessons learned from prior catastrophic wildfires ignited by its equipment,[429] as required by the WMP Guidelines.

One lesson learned listed by PacifiCorp was establishment of its Wildfire Intelligence Center (WIC).[430] PacifiCorp provided a brief narrative on its function.[431] In a data response it further helped clarify its value, not only to PacifiCorp but to its parent company. PacifiCorp's WIC is a hub for monitoring all emerging hazards across its six-state service territory.[432] It began as a

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[425] Pub. Util. Code §§ 8386(a), (c)(5), (22).

[426] WMP Guidelines, page 181.

[427] WMP Guidelines, page 181.

[428] PacifiCorp 2026-2028 Base WMP R2, pages 461-462.

[429] Cause has not been determined for the Slater Fire or McKinney Fire. PacifiCorp disputes that the Slater Fire and McKinney Fire were ignited by its facilities. PacifiCorp response to Data Request 13, Question 9, revised.

[430] PacifiCorp 2026-2028 Base WMP R2, page 461.

[431] PacifiCorp 2026-2028 Base WMP R2, page 402.

[432] PacifiCorp response to Data Request 13, Question 3.a.

place to monitor for wildfire but expanded to all hazards as of December 2025.[433] PacifiCorp stated that its WIC was modeled on the best practices of PG&E, SCE, and SoCalGas.[434]

Another lesson learned listed by PacifiCorp's was establishing its wildfire and emergency response team,[435] which was created because it found that its relationships needed to be bolstered to improve its real time ability to coordinate due to the 90 counties it serves in six states.[436] In response to a data request, PacifiCorp provided three examples from 2025 to demonstrate how the wildfire and emergency response team enhanced its emergency management relationships.[437]

PacifiCorp also listed a lesson learned for public communications and outreach.[438] PacifiCorp stated that its proposed WMP improvement is to establish a process for non-account holders to register for outage and emergency alerts.[439] However, there is no record that PacifiCorp is working to establish this process within its Base WMP. PacifiCorp's reference for this lesson learned is to a webinar it presented in March 2025 for its audience to learn more about PacifiCorp's WMP for California.[440] In response to a data request, PacifiCorp indicated that it is currently reviewing what other IOUs are doing.

Regarding the requirement that electrical corporations "include lessons learned from … from Energy Safety compliance audits and reports," in response to a data request PacifiCorp provided a lesson learned from Energy Safety's 2023 Substantial Vegetation Management Audit that was received February 21, 2025.[441] "Energy Safety will require PacifiCorp to update its 2026-2028 Base WMP per its data request response in a separate request for errata."[442]

13.2 Previous Areas for Continued Improvement

In the Energy Safety Decision for the PacifiCorp 2025 WMP Update, Energy Safety identified areas related to lessons learned where PacifiCorp must continue to improve its wildfire mitigation capabilities. This section summarizes the requirements imposed by those areas for

[433] PacifiCorp response to Data Request 13, Question 3.a.

[434] PacifiCorp response to Data Request 13, Question 3.a.

[435] PacifiCorp 2026-2028 Base WMP R2, page 461.

[436] PacifiCorp 2026-2028 Base WMP R2, page 461.

[437] PacifiCorp response to Data Request 13, Question 4.a, revised.

[438] PacifiCorp 2026-2028 Base WMP R2, page 462.

[439] PacifiCorp 2026-2028 Base WMP R2, page 462.

[440] PacifiCorp 2026-2028 Base WMP R2, page 462; California Wildfire Webinar.

[441] PacifiCorp response to Data Request 13, Question 9, revised.

[442] PacifiCorp response to Data Request 13, Question 9.b.

continued improvement, PacifiCorp's response to those requirements, and Energy Safety's evaluation of the response.

13.2.1 PC-23B-20. Lessons Learned from Past Wildfires

For this area for continued improvement, Energy Safety required PacifiCorp to provide an update on its fire incident tracking database that would be used for PacifiCorp's analysis of the root causes of its ignitions and PacifiCorp-reported catastrophic wildfires. The database would also be used for the associated lessons learned in its 2026-2028 Base WMP.[443]

13.2.1.1 PC-23B-20: PacifiCorp Response Summary

In its 2026-2028 Base WMP, PacifiCorp stated that at the end of 2024, it implemented its fire incident tracking database for fire incidents that potentially involve, or are near, PacifiCorp facilities.[444] PacifiCorp further explained that if a protective relay device operated and the incident is a CPUC reportable incident, PacifiCorp performs an investigation.[445] The investigation may provide recommendations for corrective actions. If corrective action is recommended, details are tracked in the investigation portal.[446] Non-CPUC reportable fire incidents are also captured in the fire incident database.[447]

13.2.1.2 PC-23B-20: Energy Safety Evaluation

PacifiCorp should now be able to track all fires that involve or are near PacifiCorp facilities and can investigate the causes of its ignitions and PacifiCorp-reported wildfires. [448] If corrective action is recommended by engineering investigations, PacifiCorp can now track the process in a separate PacifiCorp investigation portal, which can be used to help PacifiCorp better understand trends and associated need for mitigations to reduce ignitions, as discussed in Section 5.1.5. PacificCorp provided the information required by Energy Safety.

As such, PacifiCorp sufficiently responded to this area for continued improvement. No further reporting is required for this area for continued improvement.

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[443] Decision for PacifiCorp 2025 WMP Update, pages 540-542.

[444] PacifiCorp 2026-2028 Base WMP R2, pages 542-544.

[445] PacifiCorp 2026-2028 Base WMP R2, page 543.

[446] PacifiCorp 2026-2028 Base WMP R2, page 543.

[447] PacifiCorp 2026-2028 Base WMP R2, page 543.

[448] PacifiCorp 2026-2028 Base WMP R2, pages 538-539.

14. Cross-Category

During its evaluation, Energy Safety observed themes across WMP categories in the PacifiCorp 2026-2028 Base WMP.

14.1 Previous Areas for Continued Improvement

In the Energy Safety Decision for the PacifiCorp 2025 WMP Update, Energy Safety identified an area related to the Maturity Survey where PacifiCorp must continue to improve its wildfire mitigation capabilities. This section summarizes the requirements imposed by the area for continued improvement, PacifiCorp's response to the requirements, and Energy Safety's evaluation of the response.

14.1.1 PC-25U-11. Actions Resulting from Reduced Projected Maturity

For this area for continued improvement, Energy Safety required PacifiCorp to describe in its 2026-2028 Base WMP the actions it has implemented and the actions it plans to implement to ensure that its wildfire risk mitigation capabilities continue to mature throughout the 2026-2028 WMP cycle, based on lessons learned from the lower projected maturity in its 2024 Maturity Survey response.[449]

In 2024, PacifiCorp's response to the 2024 Maturity Survey showed lower projected maturity in many sub-capabilities for 2025 and 2026 compared to its response to the same survey in 2023.[450] In its Decision on PacifiCorp's 2025 WMP Update, Energy Safety required PacifiCorp to describe in its 2026-2028 Base WMP the actions it has implemented and the actions it plans to implement to ensure that its wildfire risk mitigation capabilities continue to mature throughout the 2026-2028 WMP cycle.[451]

14.1.1.1 PC-25U-11: PacifiCorp Response Summary

In its 2026-2028 Base WMP, PacifiCorp stated that it used the same approach for both its 2024 and 2025 surveys.[452] Further, in developing its 2026-2028 Base WMP, PacifiCorp used the results of its 2024 and 2025 surveys to identify where PacifiCorp has an initiative or mitigation activity to mature or that it has implemented.[453] PacifiCorp provided a visual representation

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[449] Decision for PacifiCorp 2025 WMP Update, page 72.

[450] Decision for PacifiCorp 2025 WMP Update, page 62.

[451] Decision for PacifiCorp 2025 WMP Update, page 72.

[452] PacifiCorp 2026-2028 Base WMP R2, page 544.

[453] PacifiCorp 2026-2028 Base WMP R2, page 545.

of its 2026-2028 Base WMP initiatives to its Maturity Survey results in *Table D-1: 2025 Maturity Survey Capabilities, Categories, and Sub-Capabilities Mapped to 2026-2028 WMP Initiatives*.[454]

In addition, PacifiCorp stated that its 2026-2028 WMP builds upon lessons learned during the 2023-2025 WMP cycle such as "increase[ing] its efforts to apply the maturity survey results."[455]

14.1.1.2 PC-25U-11: Energy Safety Evaluation

PacifiCorp's Table D-1 provides a useful visual, a map, of the actions (initiatives, responses to areas for continued improvement) that PacifiCorp plans to implement during the 2026-2028 Base WMP cycle to ensure that its wildfire risk mitigation capabilities continue to mature.

The table shows that almost all its planned maturity is in the risk assessment and mitigation strategy areas, with some maturity in grid design and some in vegetation management. Almost all its planned maturity will occur from 2025 to 2026, which will make PacifiCorp's next Maturity Survey response and Base WMP an important reflection of the risk mitigation maturity it has achieved.

The table shows limited planned maturity in grid operations and none in emergency preparedness.

By responding to its 2025 survey in an approach consistent with its 2024 approach, PacifiCorp has sufficiently responded to PC-25U-11.

14.2 Revision Notice Critical Issues

Energy Safety issued PacifiCorp a Revision Notice for its 2026-2028 Base WMP. This section evaluates PacifiCorp's response to that Revision Notice as it relates to cross-category themes.[456]

14.2.1 RN-PC-26-01. PacifiCorp Used the Same Tracking ID for Multiple Mitigation Activities

Energy Safety required PacifiCorp to provide a unique tracking ID for each mitigation activity within the broader 11 initiative tracking IDs listed in the Revision Notice.[457] Energy Safety also required PacifiCorp to update each relevant table and the accompanying narratives for each of the affected mitigation activities.[458]

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[454] PacifiCorp 2026-2028 Base WMP R2, page 545.

[455] PacifiCorp 2026-2028 Base WMP R2, pages 546-549.

[456] PacifiCorp Revision Notice Response, pages 22-25.

[457] Revision Notice for the PacifiCorp 2026-2028 Base WMP, pages 3-5.

[458] Revision Notice for the PacifiCorp 2026-2028 Base WMP, pages 3-5.

14.2.1.1 RN-PC-26-01: PacifiCorp Response Summary

In the PacifiCorp Revision Notice Response, PacifiCorp revised its 2026-2028 Base WMP "to assign unique tracking IDs to each mitigation activity that was previously grouped under a single tracking ID."[459]

14.2.1.2 RN-PC-26-01: Energy Safety Evaluation

For the 11 affected initiative tracking IDs, PacifiCorp provided the specificity required by revising its WMP to provide unique tracking IDs for each mitigation activity [e.g., a unique tracking ID for each of the six mitigation activities within Quality Assurance / Quality Control (QA/QC) (AI-12)].[460] Wheras PacifiCorp had 11 tracking IDs, it now has 37. A unique tracking ID for each mitigation activity complies with the Data Guidelines requirement of a "unique tracking ID for **a** given WMP mitigation activity."[461] (Emphasis added)

Energy Safety finds that PacifiCorp has resolved this critical issue.

14.2.2 RN-PC-26-02. Numerous PacifiCorp Qualitative Targets Lack Specificity and are Not Measurable

Energy Safety required PacifiCorp to provide qualitative targets for the eight mitigation activities in the tables provided in the Revision Notice that conform to the requirements of the WMP Guidelines.[462] The WMP Guidelines define the required qualitative targets as "[s]pecific, measurable, achievable, realistic, and timely outcomes for the overall WMP strategy, or mitigation initiatives and activities that a utility can implement to satisfy the primary goals and subgoals of the WMP program."[463]

Energy Safety also required PacifiCorp to provide qualitative targets that reflect the associated WMP narrative for the affected mitigation activities.[464] PacifiCorp's qualitative targets discussed were vague and did not demonstrate an overall strategy of what will occur during each year of the WMP cycle; and therefore, did not meet the WMP Guidelines requirements for qualitative targets.[465]

The modified targets were required to include milestones in the appropriate tables that define specific actions PacifiCorp will take to achieve the target and demonstrate progress

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[459] PacifiCorp Revision Notice Response, pages 22-24.

[460] PacifiCorp Revision Notice Response, pages 22-24.

[461] Data Guidelines v4.01, page 150, emphasis added.

[462] Revision Notice for the PacifiCorp 2026-2028 Base WMP, pages 8-9.

[463] WMP Guidelines, page A-15.

[464] Revision Notice for the PacifiCorp 2026-2028 Base WMP, pages 8-9.

[465] Revision Notice for the PacifiCorp 2026-2028 Base WMP, page 6.

year-over-year until target completion.[466] Energy Safety required PacifiCorp to include expected completion dates for its actions or analysis.[467]

14.2.2.1 RN-PC-26-02: PacifiCorp Response Summary

In the Revision Notice Response, PacifiCorp provided additional qualitative information for 15 of its qualitative targets across mitigation categories: vegetation management, situational awareness, and enterprise systems mitigation. It also converted one situational awareness qualitative target to a quantitative target.

PacifiCorp provided specific, measurable qualitative targets.

14.2.2.2 RN-PC-26-02: Energy Safety Evaluation

In its 2026-2028 Base WMP R2 PacifiCorp provided considerably more information for the 15 qualitative targets that originally "vaguely discussed the action PacifiCorp will take each year."[468] Some examples of the enhanced qualitative target changes PacifiCorp made are as follows:

- Wood and Slash Management/Debris Disposal (VM-12)[469]
    - From "Start" to "Initiate benchmarking activities: April 2026"
    - From "Benchmarking" to "Consolidate benchmarking data and continue discussion with utilities as needed"
    - From "Complete benchmarking" to "Implement changes/improvements to procedures or data management if applicable: September 2028"

PacifiCorp's revised qualitative targets now provide "[s]pecific, measurable, achievable, realistic, and timely outcomes for the overall WMP strategy, or mitigation initiatives and activities that a utility can implement to satisfy the primary goals and subgoals of the WMP program," as required by the WMP Guidelines.[470]

Energy Safety finds that PacifiCorp has resolved this critical issue.

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[466] Revision Notice for the PacifiCorp 2026-2028 Base WMP, pages 8-9.

[467] Revision Notice for the PacifiCorp 2026-2028 Base WMP, pages 8-9.

[468] Revision Notice for the PacifiCorp 2026-2028 Base WMP, page 7.

[469] PacifiCorp 2026-2028 Base WMP Redline, page 284.

[470] WMP Guidelines, page A-15.

15. Conclusion

15.1 Discussion

When Energy Safety approves a WMP, it does so with the aim of continued improvement and lists areas for continued improvement which an electrical corporation must address. Energy Safety's evaluation of PacifiCorp's 2026-2028 Base WMP found that PacifiCorp demonstrated steady progress in expanding its mitigation measures, enhanced its asset inspection efforts, and began establishing a remediation process that prioritizes high-risk vegetation. There are several areas where Energy Safety is directing PacifiCorp to benchmark and collaborate with other electrical corporations.

PacifiCorp has redesigned its protective equipment and device settings program into its enhanced safety settings program, but it is important that PacifiCorp establish the activity's effectiveness. PacifiCorp is also exploring microgrids and has selected three sites to test the feasibility of microgrids. The resulting feasibility studies will help direct the future of PacifiCorp's microgrid program.

PacifiCorp also increased its asset inspections QA/QC pass rate targets to meet industry standards. For its vegetation management efforts, PacifiCorp established remediation timelines that are based on risk. Doing so enables PacifiCorp to prioritize its needed vegetative work. For its situational awareness efforts, PacifiCorp continues to increase the number of sensors and grid monitoring devices and all of PacifiCorp's cameras operate with AI software that will run 24/7.

Important work remains ahead for PacifiCorp. It must complete its planned improvements to its risk model so PacifiCorp can understand its overall utility risk and thereby establish a system-wide mitigation selection process. Further, PacifiCorp cannot yet demonstrate a full understanding of the causes of its ignitions within its system because it does not currently track many potential ignition risk drivers. PacifiCorp also needs to expand its collection of equipment outage data to better inform its awareness of its risk drivers. PacifiCorp must establish operational changes for its vegetation management activities during weather events that pose risk.

15.2 Approval

The PacifiCorp 2026-2028 Wildfire Mitigation Plan is approved.

Catastrophic wildfires remain a serious threat to the health and safety of Californians. Electrical corporations, including PacifiCorp, must continue to make progress toward reducing wildfire risk.

Energy Safety expects PacifiCorp to effectively implement its wildfire mitigation activities to reduce wildfire and outage program risk.

PacifiCorp must meet the commitments in its approved WMP and address areas for continued improvement identified within this Decision to ensure it meaningfully reduces wildfire and outage program risk within its service territory over the plan cycle.

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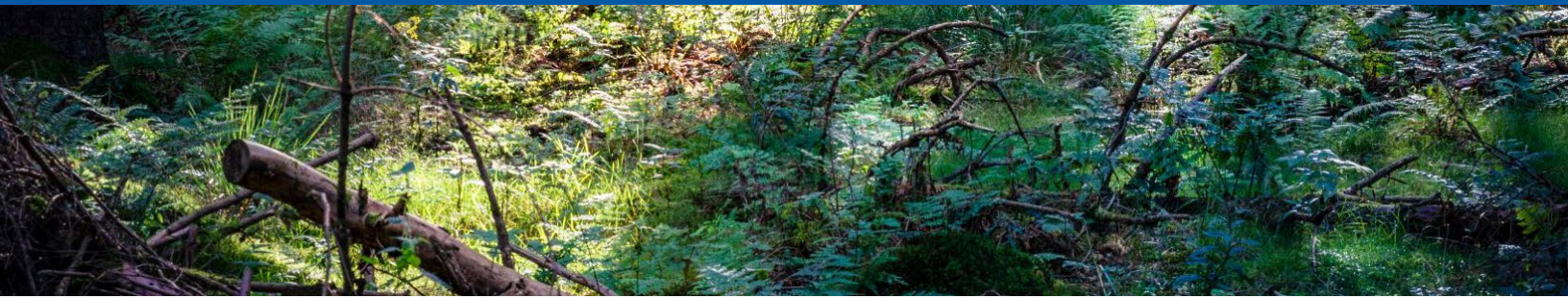
APPENDICES



APPENDICES

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Liberty Vegetation Threat Procedure	Liberty, Response to Data Request OEIS-P-WMP_2025-LU-001 Question 2 Attachment vi: "Vegetation Threat Procedure", Effective June 3, 2022, URL:(https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=58852&shareable=true).

Citation	Reference
PG&E 2026-2028 Base WMP R3	Pacific Gas and Electric Company, 2026-2028 Base Wildfire Mitigation Plan R3, Published December 30, 2025, URL:(https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=60012&shareable=true).
PG&E 2025 Q1 QDR	Pacific Gas and Electric Company, 2025 Q1 Quarterly Data Report R2, Published November 12, 2025, URL:(https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=59696&shareable=true).
PG&E Utility Standard: TD-1464S, Attachment 1	Pacific Gas and Electric Company, Utility Standard: TD-1464S, Preventing and Mitigating Fires While Performing PG&E Work, Attachment 1: Wildfire Mitigation Matrix, Published December 16, 2022, URL:(https://www.pge.com/assets/pge/docs/about/doing-business-with-pge/Attachment1-Wildfire-Mitigation-Matrix.pdf).
SCE 2026-2028 Base WMP R2	Southern California Edison Company, 2026-2028 Base Wildfire Mitigation Plan R2, Published October 27, 2025, URL:(https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=59549&shareable=true).
Revision Notice for the SCE 2026-2028 Base WMP	Office of Energy Infrastructure Safety, Revision Notice for the Southern California Edison Company 2026-2028 Base Wildfire Mitigation Plan, Published August 15, 2025, URL:(https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=59208&shareable=true).
SDG&E 2026-2028 Base WMP R2	San Diego Gas and Electric Company, 2026-2028 Base Wildfire Mitigation Plan R2, Published September 30, 2025, URL:(https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=59448&shareable=true).
GPI Opening Comments	Green Power Institute, Comments on PacifiCorp's 2026-2028 Base Wildfire Mitigation Plan, Published August 22, 2025, URL:(https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=59282&shareable=true).

Citation	Reference
WSD-002	California Public Utilities Commission (CPUC), Guidance Resolution on 2020 Wildfire Mitigation Plans Pursuant to Public Utilities Code Section 8386 (WSD-002), Published June 11, 2020, URL:(https://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M340/K859/340859823.PDF).
Utility PSPS Reports	California Public Utilities Commission (CPUC), Utility PSPS Reports: Post-Event, Pre-Season and Post-Season, Accessed January 16, 2026, URL:(https://www.cpuc.ca.gov/consumer-support/psps/utility-company-psps-reports-post-event-and-post-season).
CPUC Fire Ignition Data	California Public Utilities Commission (CPUC), Wildfire and Wildfire Safety, Accessed January 28, 2026, URL:(https://www.cpuc.ca.gov/industries-and-topics/wildfires).

Appendix B. Status of Previous Areas for Continued Improvement

Energy Safety Decision for the PacifiCorp 2025 WMP Update identified areas for continued improvement. Areas for continued improvement are areas in which PacifiCorp must continue to improve its WMP. As part of the 2026-2028 Base WMP evaluation, Energy Safety reviewed the progress reported by PacifiCorp in addressing previously identified areas for continued improvement.

Areas for continued improvement identified in Energy Safety Decisions for the PacifiCorp 2025 WMP Update and that required progress reporting in the PacifiCorp 2026-2028 Base WMP are listed in Table B-1. The status column indicates whether each has been fully addressed. If not, the column notes where to find more information in this Decision.

Table B-1. PacifiCorp Previous Areas for Continued Improvement

ID	Title	Status
PC-25U-01	Proposed Changes to the HFTD	PacifiCorp has not sufficiently addressed the required progress. PacifiCorp must continue to improve in this area for its next Base WMP. See Section 5.2.1 for Energy Safety's evaluation of this area for continued improvement. Section 5.4.1 sets forth the requirements for improvement.
PC-23B-02	Calculating Risk Scores Using 95th Percentile Values	PacifiCorp has not sufficiently addressed the required progress. PacifiCorp must continue to improve in this area for its next Base WMP. See Section 5.2.2 for Energy Safety's evaluation of this area for continued improvement. Section 5.4.1 sets forth the requirements for improvement.
PC-25U-02	PSPS and Wildfire Risk Trade-Off Transparency	PacifiCorp has not sufficiently addressed the required progress. PacifiCorp must continue to improve in this area for its next Base WMP. See Section 5.2.3 for Energy Safety's evaluation of this area for continued improvement. Section 5.4.1 sets forth the requirements for improvement.
PC-25U-03	Independent Review Transparency	PacifiCorp has not sufficiently addressed the required progress. PacifiCorp must continue to improve in this area for its next Base WMP. See Section 5.2.4 for Energy Safety's evaluation of this area for continued improvement. Section 5.4.6 sets forth the requirements for improvement.
PC-25U-04	Vendor Fire Risk Model Implementation Milestones and Dates	PacifiCorp has not sufficiently addressed the required progress. PacifiCorp must continue to improve in this area for its next Base WMP. See Section 6.2.1 for Energy Safety's evaluation of this area for continued improvement. Section 5.4.1 sets forth the requirements for improvement.

ID	Title	Status
PC-25U-05	Cross-Utility Collaboration on Best Practices for Inclusion of Climate Change Forecasts in Consequence Modeling, Inclusion of Community Vulnerability in Consequence Modeling, and Utility Vegetation Management for Wildfire Safety	PacifiCorp has sufficiently responded to this area for continued improvement. No further reporting is required for this area for continued improvement. See Section 6.2.2 for Energy Safety's evaluation of this area for continued improvement.
PC-25U-06	QA/QC Pass Rate Targets	PacifiCorp has sufficiently responded to this area for continued improvement. No further reporting is required for this area for continued improvement. See Section 8.3.1 for Energy Safety's evaluation of this area for continued improvement.
PC-25U-07	Priority A/Level 1 Remediation and Imminent Threat Designation	PacifiCorp has sufficiently responded to this area for continued improvement. No further reporting is required for this area for continued improvement. See Section 8.3.2 for Energy Safety's evaluation of this area for continued improvement.
PC-25U-08	Asset Management and Enterprise Systems	PacifiCorp has not sufficiently addressed the required progress. PacifiCorp must continue to improve in this area for its next Base WMP. See Section 12.2.1 for Energy Safety's evaluation of this area for continued improvement. Section 12.4.1 sets forth the requirements for improvement.
PC-25U-09	Continued Monitoring of Enhanced Fire Risk (EFR) Settings	PacifiCorp has not sufficiently addressed the required progress. PacifiCorp must continue to improve in this area for its next Base WMP. See Section 8.3.4 for Energy Safety's evaluation of this area for

ID	Title	Status
		continued improvement. Section 8.5.3 sets forth the requirements for improvement.
PC-23B-16	Vegetation Management Priority Tagging	PacifiCorp has sufficiently responded to this area for continued improvement. No further reporting is required for this area for continued improvement. See Section 9.3.1 for Energy Safety's evaluation of this area for continued improvement.
PC-25U-10	Emergency Resources for Responding to Faults and Ignitions	PacifiCorp has not sufficiently addressed the required progress. PacifiCorp must continue to improve in this area for its next Base WMP. See Section 11.2.1 for Energy Safety's evaluation of this area for continued improvement. Section 11.4.1 sets forth the requirements for improvement.
PC-23B-20	Lessons Learned from Past Wildfires	PacifiCorp has sufficiently responded to this area for continued improvement. No further reporting is required for this area for continued improvement. See Section 13.2.1 for Energy Safety's evaluation of this area for continued improvement.
PC-25U-11	Actions Resulting from Reduced Projected Maturity	PacifiCorp has sufficiently responded to this area for continued improvement. No further reporting is required for this area for continued improvement. See Section 14.1.1 for Energy Safety's evaluation of this area for continued improvement.

Appendix C. Consolidated List of Areas for Continued Improvement and Requirements

The list below consolidates all PacifiCorp's areas for continued improvement and requirements that PacifiCorp must address in its 2028-2031 Base WMP.

Risk Methodology and Assessment

PC-26B-01. Continued Risk Model Development

Summary: PacifiCorp continues its process of developing components of its risk model, with components completed in 2025 still needing full integration into the WMP. Given that its risk model is still in development, PacifiCorp has many values missing (e.g., overall utility risk score, the expected risk reduction, and mitigation effectiveness scores) from its 2026-2028 Base WMP R2 submission.

Requirements: In its next Base WMP, PacifiCorp must:

- Describe the progress it has made in its plan to implement PSPS risk into its risk models, including any impact on risk scores, prioritization, and decision making.
- Describe the progress it has made in its plan to implement PEDS risk into its risk models, including any impact on risk prioritization such as decision-making and risk score output.
- Describe the progress it has made in its plan to implement mitigation effectiveness into its risk modeling process, including any impact on mitigation activity selection and prioritization. This implementation discussion must also describe PacifiCorp's plan to incorporate mitigation effectiveness values outside of grid hardening mitigation activities.
- Provide PacifiCorp's progress on evaluating and implementing 24-hour burn periods, including any related milestones, timelines, and impacts.
- Provide PacifiCorp's progress on evaluating and implementing probability distributions within its risk models, including any related milestones, timelines, and impacts.
- Provide the progress it has made to incorporate a portfolio optimization and grid hardening recommendation framework into its risk model.

- Provide its analysis of the existing HFRA boundaries and any changes to HFRA boundaries from any risk model updates. Include a description of any misalignment between existing HFRA boundaries and updated HFRA boundaries and explain if PacifiCorp will seek to change its HFRA boundaries because of the risk model updates.
- Provide an update on the progress it has made for the following deferred activities:
    - Evaluating the addition of timber loss as a consideration to vendor RAVE calculation.
    - Developing a centralized solution to track wildfire and PSPS risks.
- Given the completion of its new risk model, update any related values currently listed as "TBD" in the various tables and figures throughout PacifiCorp's Base WMP.

Discussed in: Sections 5.1.2, Risk Analysis Framework; 5.2.1, PC-25U-01: Proposed Changes to the HFTD; 5.2.3, PC-25U-02: PSPS and Wildfire Risk Trade-off Transparency; 6.1.2, Wildfire Mitigation Strategy; and 6.2.1, PC-25U-04: Vendor Fire Risk Model Implementation Milestones and Dates.

PC-26B-02. Further Evaluation of Climate Change Impact on Extreme Scenarios

Summary: Many large electrical corporations and small and multi-jurisdictional utilities (SMJUs), including PacifiCorp, are currently evaluating climate change impacts. PacifiCorp has not yet incorporated the effects of climate change into its risk model. This limits the understanding of maximizing risk benefit over an asset's lifetime. Current climate change evaluations are also limited in scope and do not evaluate impacts such as extreme weather event frequency and changes in vegetation species.

Requirements: In its next Base WMP, PacifiCorp must:

- Provide a joint report with the large electrical corporations and SMJUs evaluating the potential climate change impacts on wildfire risk over a fifty-year period to better understand potential risk reduction when implementing mitigations. This report must include identification of variables impacted by climate change and how those variables impact risk modeling of wildfire risk. At a minimum, these variables must include:
    - Extreme wind events
    - Extreme drought impacts
    - Vegetation pattern changes
    - Wildfire pyrome identification and boundary changes
- As part of the Risk Model Working Group and as directed by Energy Safety, contribute to discussions and reports on topics such as how the joint study impacted PacifiCorp's risk modeling efforts and how PacifiCorp plans to implement any changes and findings discussed regarding climate change.

Discussed in: Section 5.1.3, Risk Scenarios.

PC-26B-03. Collaboration on Meteorological Scenarios

Summary: The weather scenarios used by the large electrical corporations and SMJUs in the calculation of probability and consequences vary significantly. The scenarios vary in the size of the historical record, how fire weather days are determined, and how the data is pruned for simulations. As PacifiCorp builds out the next version of its risk model, Energy Safety expects to see documentation detailing how meteorological scenarios are developed and implemented. PacifiCorp currently uses one Extreme Event Scenario based on climate change impacts on long term weather and vegetation patterns but does not provide much detail on how that was calculated nor timelines for its progress on developing additional scenarios.

Requirements: In its next Base WMP, PacifiCorp must:

- Define the historical period and fire weather days used for developing meteorological scenarios. Describe criteria for selection and justify exclusion of years and days outside of the selected dataset if that data would include historical extreme wind gusts or other extreme conditions.
- Demonstrate how distributions developed with the adopted Monte Carlo simulation method within the consequence risk model account for extreme weather that are not included within the referenced historical period. For example, demonstrate how PacifiCorp is matching the distribution of predicted fire size with historical distributions with significant tail risks.
- Collaborate with other electrical corporations via participation in the Risk Modeling Working Group (RMWG) to develop and summarize standardized extreme event scenarios, common calculation methods on the likelihood of occurrence, and a common approach to selecting weather scenarios (wind, moisture, fuels, etc.) to calculate consequences.
- Evaluate and provide an analysis of the sensitivity of the total risk in its service territory, including the risk impact of extreme event scenarios. This sensitivity analysis must also evaluate the impact of mitigations on extreme events.

Discussed in: Section 5.1.3, Risk Scenarios.

PC-26B-04. Ignition Risk Drivers

Summary: PacifiCorp's top risk driver is "Unknown." In its comments on the PacifiCorp 2026-2028 Base WMP R0, The Green Power Institute (GPI) stated a concern that PacifiCorp's "lack of understanding of risk drivers may impede its risk reduction assessment and the optimization of risk mitigation selection and prioritization."[1] Energy Safety shares these concerns and requires PacifiCorp to expand its ability to identify its risk drivers.

[1] GPI Opening Comments, pages 4-5.

Requirements: In its next Base WMP, PacifiCorp must provide:

- The processes, procedures, protocols, and tools used for root cause analysis for ignition cause determinations.
- The qualifications and training of personnel assigned to determine ignition causes.
- Its Quality Assurance/Quality Control program for verification of ignition cause data.
- The results of its investigation for all previously identified "Unknown" risk drivers throughout its system to identify the cause of ignitions, as data is available.
- An updated Table 3-1 based on its re-evaluation of "Unknown" risk drivers throughout its system.
- All additional actions PacifiCorp is taking to minimize attributing future ignitions as "Unknown" causes, including a timeline for such actions.
- Copies of any procedure(s) impacted by re-evaluation and additional actions to minimize "Unknown" causes.

Discussed in: Section 5.1.5, Ignition Risk Drivers.

PC-26B-05. Development of Substantive Model Documentation

Summary: Several of the electrical corporations, including PacifiCorp, did not provide detailed technical documentation for its models and data sets used for risk analysis, including probability of failure and probability of ignition models, consequence models, weather models, and fuel models. PacifiCorp is still developing multiple components of its risk model, as described in Section 5 and Appendix B of its 2026-2028 Base WMP. As the model is developed further, PacifiCorp must be able to provide substantive documentation for the evaluation of the methodologies, verification, and validation of the models.

Requirements: In its next Base WMP, PacifiCorp must provide documentation on its risk analysis and modeling to capture the following information:

- A detailed description of its risk models, including assumptions or statistical approaches used for the risk models. This must include an explanation for any assumptions and scaling factors used;
- A detailed description of datasets used for modeling probability of ignition, consequence, weather, and fuels; including sources for data and why each dataset was included; and
- Description of the verification and validation approaches of each model, including any available results.

Discussed in: Section 5.1.1, Methodology.

PC-25U-03. Independent Review Transparency

Summary: In response to PC-25U-03, PacifiCorp committed to completing a third-party review once its risk model is updated but did not provide a detailed plan for implementing review procedures and contracting with an independent third-party reviewer for its risk model, including detailed milestones, which is necessary for model validation.

Requirements: In its next Base WMP, PacifiCorp must:

- Provide a detailed plan for implementing new procedures relating to reviewing and validating its wildfire risk models. This plan must be more detailed than the plan PacifiCorp provided in its 2025 WMP Update, and must include:
  - Attachments of any associated procedures.
  - All discrete tasks related to review and validation of PacifiCorp's risk models.
- Provide a status update regarding PacifiCorp's plan to obtain an independent third-party to review its risk models, including discrete dates for when PacifiCorp will obtain a third-party contractor and when the third-party review will be completed.
- Provide a plan, timeline, and milestones (include target completion dates) for incorporating any changes to its risk model based on the third-party review. The plan must include a description of any potential complicating factors relating to implementation.

Discussed in: Section 5.2.4, PC-25U-03: Independent Review Transparency.

Wildfire Mitigation Strategy Development

PC-26B-06. Circuit Selection for WMP Targets

Summary: PacifiCorp has set mileage targets in 2027 and 2028 for line rebuild as part of mitigation activity GH-01, but stated that the specific circuits are subject to change over the next 18 months due to design, permitting, right of way, and material procurement activities that still need to take place.[2] It is important to have specific circuit information for planned mitigation activities, including rebuild miles, to ensure the mitigation work is being done on the highest risk circuits, and to ensure Energy Safety can assess performance with WMP targets.

Requirements: In its next Base WMP, PacifiCorp must provide an updated Table 6-4: Summary of Risk Reduction for Top-Risk Circuits and Table PAC 6-1: Summary of Risk Reduction for Circuits With Maximum Fuel/Terrain Wildfire Risk Scores that identifies the specific circuits that will be targeted for mitigation activities during the 2026-2028 Base WMP.

[2] PacifiCorp response to Data Request 6, Question 2.b.

Discussed in: Section 6.1.1, Risk Evaluation.

PC-26B-07. Joint Study for Mitigation Activity Effectiveness Estimates

Summary: IOUs have varying methodologies and results when evaluating mitigation initiative effectiveness. These differences include variations in available in-field data, which type of data is used to determine effectiveness, and how effectiveness is calculated. PacifiCorp has not yet provided mitigation activity effectiveness estimates but states it will calculate initial estimates by the end of 2025.

Requirements: In its next Base WMP, PacifiCorp must collaborate with the IOUs to determine more consistent methodologies and evaluations of mitigation activity effectiveness. The IOUs must complete and provide a joint study and report by March 1, 2028, to the 2026-2028 Base WMP Docket (#2026-2028-Base-WMPs), and include that report in their subsequent Base WMP submission. The report must cover the following topics and summary:

- What type of data could be used to determine mitigation activity effectiveness. This topic must include discussions of the following:
    - How to share available data across IOUs,
    - Evaluation of all mitigation activities performed by IOUs listed out with the various current effectiveness estimations being used by IOUs, and discussion of shortcomings for any mitigation activities that do not currently have effectiveness values calculated,
    - Evaluation of the use of ignition vs. outage vs. other data for evaluating ignition risk, including a comparison of benefits and weaknesses,
    - Other ways to augment useable data for any limited data sets, including any shortcomings and potential remedies for increasing accuracy when using additional data, and
    - Evaluation of variations on methodologies used by IOUs for translating data into probability of ignition.
- How IOUs measure effectiveness of mitigation activities against various risk drivers. This topic must include reporting on completion of the following:
    - Synchronization among IOUs on ways to calculate effectiveness of various mitigation activities against various risk drivers, including benefits and weaknesses of IOUs' current approaches as a comparison,
    - Weighing various risk drivers in terms of associated ignition and wildfire risk, and
    - Summation of various risk driver effectiveness values into overarching effectiveness value.
- How mitigation activity effectiveness is used when determining mitigation prioritization and selection. This topic must include the following:

  - A discussion of the granularity in which effectiveness values are used during mitigation selection based on an evaluation of location-specific risk drivers, including how those drivers are selected and weighted for a given area, and
  - An analysis of how mitigation activity informs and impacts cost-benefit analysis, including a discussion and comparison of any differences on scaling across IOUs.
- How to evaluate mitigation activities in combination. This topic must include reporting on completion of the following:
  - Synchronization among IOUs on potential combinations to include when calculating joint effectiveness estimates,
  - Demonstration that electrical corporations have shared measured in-field effectiveness with one another and have integrated it into overall effectiveness calculations, and
  - Measuring overlapping and added benefit based on evaluation of ignition drivers impacted by various mitigations, including a comparison of IOUs' current efforts.

IOUs must also participate in Energy Safety-led activities, such as workshops or working group meetings, to further consider requirements around effectiveness.

Discussed in: Section 6.1.2.2, Effectiveness Scores.

Grid Design, Operations, and Maintenance

PC-26B-08. Integrated Planning and Performance of Covered Conductor, Undergrounding, and Installation of System Automation Equipment

Summary: PacifiCorp's wildfire mitigation strategy relies on covered conductor installation, undergrounding, and system automation equipment deployment, yet all three mitigation activities face implementation challenges. Covered conductor targets were not met from 2021 to 2024. Targets related to undergrounding and automation equipment installations lack project planning beyond 2026. PacifiCorp attributed the delays to permitting, right-of-way acquisition, and internal ramp-up limitations for all three mitigation activities. While PacifiCorp has engaged a third-party contractor to support these efforts, PacifiCorp must provide a plan, comparison of targets versus actuals, and lessons learned to ensure progress and resolution of the delays.

Requirements: In its next Base WMP, PacifiCorp must:

- Provide a plan detailing how PacifiCorp will monitor the schedule, cost, and project execution of covered conductor, undergrouding, and system automation projects delivered by the third-party contractors, including the specific governance and oversight structures PacifiCorp will use.

  - At a minimum, the plan must include:
    - How PacifiCorp will oversee project delivery, corrective actions, and schedule and cost deviations.
    - How cost will be monitored against approved budgets.
    - How construction QA/QC programs will track performance.
- Provide a comparison table of targets versus actuals for covered conductor, undergrounding, and system automation projects for the past three years.
  - The table must include schedule and cost performance for each year. PacifiCorp must include an explanation for all variance in project schedule and cost, such as permitting, right-of-way acquisition, and construction challenges.
- Explain how PacifiCorp will use lessons learned from 2026–2028 program delivery (e.g., permitting bottlenecks, construction management challenges, contractor performance, material availability) to refine scoping, scheduling, and planning for its next Base WMP.
  - At a minimum, the lessons learned must document:
    - Permitting issues and solutions, construction challenges, and contractor performance issues.
    - Project scoping updates to improve circuit selection and contingency planning.
    - Construction schedule refinements to improve project delivery.

Discussed in: Sections 8.2.1.1, Covered Conductor Installation, 8.2.1.2, Undergrounding of Electric Lines and/or Equipment, and 8.2.1.6, Installation of System Automation Equipment.

PC-26B-09. Distribution and Transmission Pole Wrap Activity

Summary: PacifiCorp is currently deploying pole wraps as an interim wildfire risk mitigation strategy in areas of heightened wildfire risk but has not yet established performance targets or fully evaluated the effectiveness of this mitigation activity. PacifiCorp did not track pole wrap installation locations prior to 2025 and is currently evaluating where wraps will be most effective. PacifiCorp reported that it will prioritize pole wrap locations by using flame height modeling and cost-benefit analysis.[3]

Requirements: In its next Base WMP, PacifiCorp must:

- Provide locations where pole wraps were installed in 2025 and in the 2026–2028 Base WMP cycle, including:
  - Circuit ID, mileage, and HFTD/HFRA status, and

[3] PacifiCorp 2026-2028 Base WMP R2, page 177.

  - Whether those poles were later replaced or remain in-service with wraps.
- Discuss the evaluation criteria used to determine ideal installation locations. In addition to flame height modeling and cost-benefit analysis, PacifiCorp must consider nearby roads and egress/ingress constraints in its prioritization of installation locations. Lastly, PacifiCorp must discuss if and how it incorporates other factors such as surrounding fuels, terrain, and historical ignition data.
- Complete and summarize its evaluation of pole wrap effectiveness, including failure modes during fire exposure or high-heat events, and explain if the results of the evaluation will change PacifiCorp's inspection practices, replacement criteria, and future pole wrap use.
- Provide targets for pole wraps (GH-15) for each year of its upcoming Base WMP.

Discussed in: Section 8.2.1.3, Distribution and Transmission Pole Replacements and Reinforcements.

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

Summary: To mature its PEDS strategy, PacifiCorp is required to continue maturing its ESS enablement and assess ways to implement emerging technologies to alert PacifiCorp to grid hazards and faults, which can complement PacifiCorp's covered conductor activity. In Response to PC-25U-09, PacifiCorp stated that it does not have a quantitative assessment of the effectiveness or impact of its ESS due to its change in PEDS strategy.[4] In addition, PacifiCorp did not indicate planned evaluations or emerging grid technology pilots that other electrical corporations have implemented. [5]

Requirements: In its next Base WMP, PacifiCorp must:

- Provide the following ESS enablement data for its past four years:
  - Number of outages.
  - Duration of outages.
  - Frequency of outages per circuit.
  - Number of customers impacted.
  - Response time for outages.
- Provide the most recent annual evaluation of circuits utilizing ESS, including an evaluation of the impact on reliability, and a description of any short-term mitigation projects identified from the evaluation.

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[4] PacifiCorp 2026-2028 Base WMP R2, page 539.

[5] PacifiCorp 2026-2028 Base WMP R2, page 183.

- Provide a quantitative assessment of the effectiveness and fire risk reduction due to PacifiCorp's implementation of ESS, which considers the number, duration, and frequency of outages; the number of customers impacted; the response time for outages; the number of ESS enabled devices; weather conditions; and other environmental factors.
- Provide a description of how PacifiCorp implemented best practices from peer IOUs including relay thresholds and settings used by the IOUs to increase reliability while reducing fire risk.
- Provide an emerging grid operations technologies, equipment, devices, and settings feasibility study.
    - Discuss emerging grid hardening technologies, equipment, devices, and settings that may be feasible to implement in its service territory.
    - If programs are determined to be feasible, set qualitative targets for testing, piloting, risk effectiveness evaluation, and implementation.

Discussed in: Section 8.2.1.4, Emerging Grid Hardening Technology Installations and Pilots and Section 8.3.4, PC-25U-09: Continued Monitoring of Enhanced Fire Risk (EFR) Settings.

PC-26B-11. Microgrids Feasibility and Implementation

Summary: PacifiCorp hired a consulting company to perform feasibility studies and planning for three microgrid projects located in the HFTD, with stated energy capacities and associated infrastructure. PacifiCorp is currently evaluating the results from the studies and unit pricing. Given the potential for microgrids to improve resiliency and reduce wildfire risk on remote, high-risk circuits, PacifiCorp must provide further planning detail and progress reporting.

Requirements: In its next Base WMP, PacifiCorp must:

- Provide its evaluation of the microgrid feasibility studies, including:
    - Technical specifications (e.g., capacity, location, associated line miles, generation type).
    - Wildfire risk reduction and load served.
    - Site-specific cost estimates.
- Provide an implementation schedule for each proposed microgrid PacifiCorp decides to implement, including permitting, procurement, interconnection, and construction milestones.
- Include any lessons learned from prior microgrid efforts and how they inform PacifiCorp's microgrid program.

Discussed in: Section 8.2.1.5, Microgrids.

PC-26B-12. De-energized Transmission Line Assessment and Removal

Summary: Large electrical corporations and SMJUs have de-energized but unremoved transmission lines within the HFTD for various operational reasons. These de-energized transmission line segments, especially those that run parallel to energized transmission lines, pose a potential wildfire risk due to inadvertent re-energization. Risk levels of these de-energized lines are dependent on grounding configurations, proximity to energized lines, and vegetation contact.

Large electrical corporations and SMJUs define, assess, and mitigate risk associated with these de-energized lines differently. Some electrical corporations have undertaken detailed circuit level or simulation-based studies to quantify risks, while others have not. Definitions of terms such as "de-energized," and "abandoned" lines also vary across electrical corporations, further complicating comparisons and evaluations across electrical corporations.

PacifiCorp currently reports no de-energized transmission lines within the HFTD and its HFRA; nonetheless, PacifiCorp is reviewing all de-energized transmission lines within its service territory and is planning to update its asset management policy to include de-energized transmission lines.[6] PacifiCorp reported that there are no known de-energized lines planned for removal.[7] PacifiCorp hired a contractor to run power simulation models and provided a draft of its contractor's technical memorandum.[8] In the draft, the contractor noted that short circuited transmission line segment may lead to lower induction risk. Therefore, in its Circuit Level Risk Assessment, PacifiCorp must report its grounding configurations and segmentations taken to reduce induction risk.[9]

To ensure large electrical corporations and SMJUs are managing wildfire risks from unremoved de-energized transmission lines, Energy Safety requires the electrical corporations to provide a terminology framework, provide a circuit level risk assessment, incorporate lessons learned from existing studies, provide a comprehensive mitigation strategy, and report its inspection and maintenance protocols for unremoved de-energized transmission lines in the HFTD.

Requirements: In its next Base WMP, PacifiCorp must:

- Collaborate with other large electrical corporations and SMJUs to submit a joint cross-utility terminology framework that establishes consistent definitions for the following:
    - De-energized transmission lines.

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[6] PacifiCorp response to Data Request 7, Question 6.

[7] PacifiCorp response to Data Request 7, Question 6.

[8] Idle Line Study.

[9] PacifiCorp response to Data Request 7, Question 6.

  - Abandoned transmission lines.
    - If the large electrical corporations' and SMJUs' definition for "abandoned transmission lines" is different from the definition in GO 95, Rule 31.6 for "permanently abandoned lines," the large electrical corporations and SMJUs must explain the difference between the two terms and their usage.[10]
  - Any other types of transmission line designations, such as "idle," that the electrical corporation uses for de-energized or no longer in use transmission lines that have not yet been removed.
- Provide a Circuit Level Risk Assessment. For de-energized, abandoned, or other similarly situated transmission circuits that are located in the HFTD, PacifiCorp must:
  - Identify potential ignition hazards such as electrostatic or electromagnetic coupling with adjacent energized lines, identify the factors that affect the risk of these hazards causing ignitions, and provide a risk analysis; and
  - Specify whether the line is grounded (single-point, multi-point, ungrounded), and how grounding configuration affects induction risk.
- Incorporate Lessons Learned from Existing Studies. The methodology for the risk assessment must include, at minimum:
  - Evaluation of grounding configurations and their impacts on fault current magnitudes (as shown in SDG&E's study "Corridor Induction Risk Assessment of Out-of-Service Transmission Lines in SDG&E HFTD" and PacifiCorp's "Idle Line Study");
  - Spatial distance between energized and de-energized lines and the orientation of line configurations (horizontal vs. vertical stacking); and
  - Sensitivity analysis on variables such as fault location, fault resistance, and line length, especially under fault-current scenarios.
- Provide a Comprehensive Mitigation Strategy. If applicable, each large electrical corporation and SMJU must provide an existing plan or develop a new plan that includes:
  - Identification of de-energized, abandoned, or other similarly situated transmission lines;
  - A decision-making process for the removal, modification of grounding configuration, or other mitigation of de-energized, abandoned, or other similarly situated transmission lines based on ignition risk; and

[10] GO 95, Rule 31.6.

        - If identified de-energized transmission lines are subject for future use, describe its planned use, its grounding-configuration, and any intermittent mitigation strategies.
    - Timeline for mitigation actions, including short-term and long-term activities.
- Report Inspection and Maintenance Protocols. PacifiCorp must:
    - Describe its inspection and maintenance process for de-energized, abandoned, or other similarly situated transmission circuits in the HFTD. This description must highlight any differences between the inspection and maintenance of energized versus de-energized, abandoned, or other similarly situated transmission circuits.
        - For each de-energized, abandoned, or other similarly situated transmission circuit in the HFTD, PacifiCorp must list the frequency and type of asset and vegetation inspections performed, the remediation timeframe for each priority of condition identified during inspection, and any routine maintenance performed.
        - For any de-energized, abandoned, or other similarly situated transmission circuit in the HFTD that is not subject to the same frequency and/or type of inspection, condition remediation timeframe, or routine maintenance work as similar, energized circuits, PacifiCorp must provide its decision-making process for reaching this determination.
    - Outline any planned changes to the inspection and maintenance of de-energized, abandoned, or other similarly situated transmission circuits in the HFTD.

Discussed in: Section 8.2.1.7, Line Removal in the HFTD.

PC-26B-13. Detailed Transmission Inspection Comparative Analysis

Summary: PacifiCorp performs less frequent detailed transmission inspections than its peer electrical corporations PG&E, SCE, and SDG&E yet demonstrate a significantly lower find rate of Level 2 conditions. While PacifiCorp's detailed inspections have demonstrated a Level 2 condition find rate of 1.54 percent, SDG&E's detailed transmission inspections have demonstrated a Level 2 condition find rate of 7.52 percent, PG&E's have demonstrated a find rate of 19.2 percent, and SCE's have demonstrated a find rate of 5.5 percent.[11] Given that the condition of all of PacifiCorp's equipment is monitored through human visual inspections,[12] it

[11] SDG&E, PG&E, and SCE 2026-2028 WMPs, *Table 8-2: Asset Inspection Frequency, Method, and Criteria*.

[12] PacifiCorp 2026-2028 Base WMP R2 pages 220-226.

is important that PacifiCorp's detailed transmission inspections effectively identify Level 2 conditions.

Requirements: In its next Base WMP, PacifiCorp must provide a comparative analysis of PacifiCorp's Drone Transmission Inspections program and Detailed Transmission Inspection program. For each type of inspection, this analysis must include, at a minimum, a description, comparison, and evaluation of:

- The training for the identification of GO 95, Rule 18-B(1)(a) Level 1, 2, and 3 conditions that are provided to the inspectors (including any contractor inspectors).[13]
- Job aids and reference material provided to the inspectors.
- Feedforward information provided to the inspectors (e.g., expected issues on assets and equipment to be inspected).
- Feedback information provided to the inspectors (e.g., quality control on performed inspections).
- The number and types of Level 1 and Level 2 conditions identified by the inspections.
    - For any condition code where the drone inspection find rate is more than 5 percent higher than the detailed distribution inspection find rate, PacifiCorp must discuss at least three potential reasons for the discrepancy and identify the most likely.
    - For any condition code where the drone inspection find rate is more than 10 percent higher than the detailed transmission inspection find rate, PacifiCorp must provide its plan to adjust its detailed transmission inspection program to better identify such findings. Adjustments may include changes to, or the creation of, training, job-aids, checklists, equipment and/or technology used for inspections. PacifiCorp must provide a brief discussion of each change. The plan must include milestones for implementation of the changes identified.
        - If PacifiCorp elects to not adjust its detailed inspection program despite a 10 percent find rate discrepancy, PacifiCorp must provide its reasoning for this decision. This reasoning must include a discussion of the impact of this condition existing unaddressed on wildfire risk, potential adjustments that would improve PacifiCorp's detailed inspection's ability to detect the condition, and the feasibility of implementing such adjustments.

Discussed in: Section 8.2.2.3, Detailed Transmission Inspections.

[13] GO 95, Rule 18-B(1)(a), pages I-10 to I-11.

PC-26B-14. Equipment Failure Data

Summary: In its 2026-2028 Base WMP, PacifiCorp reported that it has limited information pertaining to equipment failures of the various equipment types described in Chapter III, Section 8.4 of the WMP Guidelines. However, in response to a data request, PacifiCorp reported collecting outage data that includes five equipment failure cause categories and 50 equipment components.[14] While most of the equipment components associated with CPUC reportable ignitions in 2024 are accounted for in PacifiCorp's outage data collection, there are several that are not, including guy wire, clamp, pothead, riser, service connector, and service drop.

To facilitate evaluation of PacifiCorp's equipment maintenance practices, PacifiCorp must provide historical outage data in lieu of equipment failure rates. To ensure PacifiCorp can identify potential gaps in its maintenance program, it must update its equipment failure data collection to include at minimum all components that have been linked to CPUC reportable ignitions.

Requirements: In its next Base WMP, PacifiCorp must:

- Populate a table that includes, at a minimum, the columns listed below for each distinct equipment failure outage recorded in the HFTD and HFRA from 2023 through 2026.
    - The direct cause category column must correspond to one of the four equipment failure direct causes listed in Attachment 1, provided by PacifiCorp in response to Data Request 7, Question 3.[15]
    - The component category must correspond to the equipment listed in the component column of Attachment 2, provided by PacifiCorp in response to Data Request 7, Question 3.[16] For conductor and cable, the estimated equipment count unit should be miles.

[14] PacifiCorp response to Data Request 7, Question 3.

[15] PacifiCorp response to Data Request 7, Question 3, Attachment 1.

[16] PacifiCorp response to Data Request 7, Question 3, Attachment 2.

			2023		2024		2025	
Direct Cause	Component	Asset class	Number of outage events	Total estimated equipment count	Number of outage events	Total estimated equipment count	Number of outage events	Total estimated equipment count

- Establish more reliable and comprehensive equipment failure data collection processes, either through updating existing processes or establishing new processes. The established data collection process must:
  - Consider all electrical system components associated with CPUC reportable ignitions from 2014 to 2024. PacifiCorp must review the PG&E, SCE, and SDG&E Fire Ignition Data reported to the CPUC.[17]
  - Ensure all failed equipment is accurately recorded by responding personnel, whether the failure is observed because of outage response, inspection, routine maintenance, or other response.
- Provide a description of PacifiCorp's established equipment failure process including:
  - A list of all specific electrical system equipment and components that PacifiCorp will collect failure data for.
  - How PacifiCorp will ensure that equipment failures do not remain undetected or unreported.
  - How PacifiCorp ensures that events are correctly categorized as equipment failures (e.g., if a conductor is in contact with the ground, it could be the result of vegetation contact, not equipment failure).
  - How PacifiCorp will ensure that the specific equipment that failed is identified correctly (e.g., if a conductor is in contact with the ground, it could be the result of a splice, connector, or conductor failure).

Discussed in: Section 8.2.3, Equipment Maintenance and Repair.

Vegetation Management and Inspections

PC-26B-15. Enhancing Wood and Slash Management Recordkeeping

Summary: PacifiCorp described its wood and slash/debris management as actions that it will implement throughout its 2026-2028 Base WMP cycle to address vegetative material that is

[17] Fire Ignition Data.

generated by conducting its vegetation management work.[18] However, PacifiCorp's data management software does not record when wood and slash/debris management actions are completed. Consequently, PacifiCorp cannot provide documentation verifying completion or identifying the type of wood and slash management that it performed.

Requirements: In its next Base WMP, PacifiCorp must:

- Provide the results from the benchmarking activities performed pursuant to PacifiCorp's Wood and Slash Management/Debris Disposal (VM-12) target during the 2026-2028 Base WMP cycle. The results must discuss:
  - Similarities and differences that were found between each participating IOU.
  - Any actions that PacifiCorp chose to implement as a result of the benchmarking activities.
- Describe record keeping enhancements that PacifiCorp has implemented to document and verify completion of wood and slash/debris management actions for each completed vegetation management work order in its tracking system. These enhancements may include the addition of new fields in PacifiCorp's mobile data management software to record the type of wood and slash/debris management performed (e.g., lopping, chipping, removal) and the date such actions were completed for each work order.

Discussed in: Section 9.2.2, Wood and Slash Management.

PC-26B-16. Operational Modifications for Wildfire Weather

Summary: PacifiCorp stated in its 2026-2028 Base WMP that fire weather conditions trigger operational changes.[19] However, unlike its peer electrical corporations, PacifiCorp does not have plans to internally initiate vegetation management operational changes based on wildfire weather risk level.[20]

Requirements: In its next Base WMP, PacifiCorp must use its Fire Potential Index (FPI) or another measure of fire weather risk to define specific operational changes for its vegetation management activities. These changes must become increasingly restrictive as wildfire risk increases (e.g., when weather causes its service territory or a portion of its service territory to increase from low to moderate to high wildfire risk).[21] In providing its response to this area for

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[18] PacifiCorp 2026-2028 Base WMP R2, pages 308-311.

[19] PacifiCorp 2026-2028 Base WMP R2, page 316.

[20] PacifiCorp 2026-2028 Base WMP R2, pages 316-317; PacifiCorp 2026-2028 Base WMP R1, Appendix F, Attachment 15, pages 6-7.

[21] PacifiCorp indicates it uses four categories to describe district-level wildfire risk: "Little to No Wildfire Risk," "Elevated Wildfire Risk," "Significant Wildfire Risk," and "Extreme Wildfire Risk." PacifiCorp 2026-2028 Base WMP R2, page 390.

continued improvement, PacifiCorp should review, as examples, Liberty's "Fire Prevention Plan for Overhead Electric Facilities" and PG&E's "Wildfire Mitigation Matrix" in Attachment 1 of its Utility Standard: TD-1464S.[22]

PacifiCorp must incorporate into its WMP and standard operating procedures its plans for vegetation management operational changes as wildfire weather risk increases. At a minimum these plans must address:

- Tools that are likely to produce sparks (e.g., chainsaws, chippers, weed eaters, mowers, etc.).
- Vehicle use that may produce sparks or heat (e.g., driving or parking on unpaved roads, pulling equipment, etc.).
- Mitigation activities by location and initiative (e.g., differentiate operational changes for inspections, pruning and removal, pole clearing, etc. that occur in the HFTD as compared to the non-HFTD).
- How it will communicate to vegetation management employees the level of operational restrictions in place due to weather conditions.

Discussed in: Section 9.2.5, Activities Based on Weather Conditions.

PC-26B-17. Priority Tagging Alignment

Summary: In its 2026-2028 Base WMP, PacifiCorp provided risk-based criteria that will allow it to determine and assign priority to work locations. However, for Priority Level 2 condition vegetation that it identifies, PacifiCorp stated that it will, within 90 days, remediate vegetation that is within internal or regulatory compliance distances or is likely to fall into electrical infrastructure. This timeline does not align with PacifiCorp's peers, who target remediation of similar vegetation conditions within 30 days.

Requirements: In its next Base WMP, PacifiCorp must:

- Align its remediation timeline for Priority Level 2 condition vegetation with its peers, or justify why it has not aligned its remediation timeline for Priority Level 2 condition vegetation with its peers.
- Provide an updated version of PacifiCorp's "Transmission and Distribution Vegetation Management Program Standard Operating Procedure" that reflects its response to RN-PC-26-08 and the changes it describes in response to this area for continued improvement.[23]

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[22] Liberty Fire Prevention Plan for Overhead Electric Facilities, pages 8-12; PG&E Utility Standard: TD-1464S, Attachment 1.

[23] PacifiCorp 2026-2028 Base WMP R2, pages 332-334.

Discussed in: Section 9.2.7, Work Orders.

Emergency Preparedness, Collaboration, and Public Awareness

PC-26B-18. Analysis of PacifiCorp's Prevention and Suppression Resources

Summary: PacifiCorp must evaluate its field resources for fault and ignition response following a best practices analysis of its California and Pacific Northwest electric utility partners.

Requirements: In its next Base WMP, PacifiCorp must provide:

- An analysis of its prevention and suppression resources in its California service territory. This analysis must demonstrate the adequacy of its resources for preventing and responding to faults and suppressing ignitions associated with its assets.
    - This analysis must include PacifiCorp's internal prevention and suppression written procedure for its field personnel. A table (similar to *Table 7.4: List of firefighting equipment and locations* from PacifiCorp's 2022 WMP Update) that lists the fire prevention, suppression, and/or firefighting equipment it has available for use in its California service territory for fault and ignition response. This table must provide equipment description and location information.

Discussed in: Section 11.2.1, PC-25U-10: Emergency Resources for Responding to Faults and Ignitions.

Enterprise Systems

PC-26B-19. Asset Management and Enterprise Systems

Summary: In response to PC-25U-08, PacifiCorp did not provide sufficient details regarding its EAM implementation. Specifically, PacifiCorp did not adequately describe the processes for how its systems integrator will migrate asset inventory, inspection, and maintenance data from the legacy mainframe to the EAM system; the controls used to maintain data integrity and quality during data migration; and the processes used to update asset records in the EAM system following hardening or repair work.

Requirements: In its next Base WMP, PacifiCorp must demonstrate its ability to migrate its asset inventory, inspection, and maintenance data from its legacy mainframe to its new EAM software suite with sufficient details regarding processes, controls, and quality control. PacifiCorp must provide:

- 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.
- Its data quality thresholds or quantitative acceptance criteria used to confirm data integrity, completeness, and accuracy.
- Its timeline for when PacifiCorp expects to begin and complete the full data conversion.
- 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.
- 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.

Discussed in: Section 12.2.1.2, PC-25U-08: Energy Safety Evaluation.

Appendix D. Public Comments

Public Comments on the PacifiCorp 2026-2028 Base WMP

Energy Safety invited members of the public to provide comments on the PacifiCorp 2026-2028 Base WMP. The following individuals and organizations submitted comments:

- The Green Power Institute (GPI)

Comments received on the PacifiCorp 2026-2028 Base WMP can be viewed in the 2026-2028 Base WMP (2026-2028-Base-WMPs) docket log.

Energy Safety concurred with and incorporated the following comments into this Decision for the PacifiCorp 2026-2028 Base WMP:

- GPI commented that PacifiCorp top risk driver is "Unknown," which is indicative of its unknown risk in the field. GPI recommended that PacifiCorp should be ordered to begin tracking all outage/failure event and ignition drivers, including CPUC-reportable and non-reportable ignitions, via an area for continued improvement.
    - Energy Safety requires PacifiCorp to track and report on its efforts to decrease its risk from "Unknown" risk drivers in PC-26B-045: Ignition Risk Drivers.
    - Energy Safety is also concerned with PacifiCorp's limited information pertaining to equipment failures of the various equipment types and is requiring PacifiCorp to provide historical outage data in lieu of equipment failure rates and update its equipment failure data collection in PC-26B-14.
- GPI asked that PacifiCorp be required to adopt the common Energy Safety definitions and re-write its Section 5 risk model description based on those definitions.
    - Energy Safety issued RN-PC-26-03, requiring that PacifiCorp provide greater consistency in explaining components of its risk model and provide transparency into the relationship between each component. PacifiCorp corrected its definitions in its Revision Notice Response and its 2026-2028 Base WMP R1.
- GPI commented that PacifiCorp should clarify whether and how it includes probability of ignition given a failure/outage in its risk planning model and if not, why not.
    - Energy Safety expects PacifiCorp to provide updates on incorporating probability of ignition into its risk methodology along with its broader updates to its risk model in its next Base WMP. This is captured in PC-26B-01: Continued

Risk Model Development" and PC-23B-05: Development of Substantive Model Documentation.

- GPI commented that PacifiCorp should improve the clarity of its Section 5 and stated that it is duplicative and confusing terminology usage should be remedied.
    - Energy Safety notes that the issue of PacifiCorp's risk model development and validation is covered under the PC-26B-01: Continued Risk Model Development.
- GPI commented that in PacifiCorp's next WMP filing that it should be required to report on its PSPS and PEDS risk model and that an area for continued improvement should require PacifiCorp to provide a detailed update on its outage risk model including a description of the in-progress method.
    - Energy Safety notes that the issue of PacifiCorp's risk model development and validation is covered under the PC-26B-01: Continued Risk Model Development.
- GPI commented that PacifiCorp's risk reduction assessment and investment strategy must consider PSPS and PEDS.
    - Energy Safety concern with PacifiCorp's risk model development and validation, including outage risk model, is encompassed under the PC-26B-01: Continued Risk Model Development.
- GPI commented that PacifiCorp must provide a detailed description of how undergrounding is selected compared to overhead line rebuild and establish an annual target for planned undergrounding miles, and that PacifiCorp should be ordered to resubmit its WMP with separate overhead and undergrounding line rebuild targets.
    - Energy Safety addressed this topic in Revision Notice issue RN-PC-26-04. PacifiCorp's Combined Targets for Covered Conductor and Undergrounding Do Not Allow for Distinct, Trackable Targets. PacifiCorp separated its targets in its revised 2026-2028 Base WMP R1.
- GPI commented that PacifiCorp should be required to provide the risk-informed methodology it will use to determine location-specific undergrounding versus covered conductor.
    - Energy Safety addressed the continued development of PacifiCorp selection criteria and mitigation strategy in PC-26U-01: Continued Risk Model Development and PC-26B-07: Joint Study for Mitigation Activity Effectiveness Estimates.
- GPI commented that PacifiCorp should accelerate plans for the third-party review of its risk model and generally work to improve its understanding of system risk for the purposes of mitigation selection and system rebuild prioritization.

  - Energy Safety addresses the issue of independent review of PacifiCorp's risk model within PC-25U-03: Independent Review Transparency.
- GPI commented that PacifiCorp should develop a plan for reducing PEDS outage frequency, scale, scope, duration, and/or consequence as PacifiCorp should have sufficient data on PEDS outage locations and drivers to develop a well formulated, multi-faceted PEDS outage risk reduction plan regardless of the status of its PEDS risk model.
  - Energy Safety acknowledges that PacifiCorp recently changed its PEDS program to Enhanced Safety Settings (ESS). PC-26B-10: Continued Monitoring of Enhanced Safety Settings (ESS) has been developed to give PacifiCorp the necessary guidance to mature its PEDS enablement.
- GPI commented that PacifiCorp should be ordered to set targets for all pilot programs.
  - Energy Safety requires the reporting on several PacifiCorp pilots, such as ESS and microgrids. PC-26B-10: Continued Monitoring of Enhanced Safety Settings (ESS) will determine if the ESS pilot program is feasible and set targets. The results of its microgrids pilots will be reported in PC-26B-11.
- GPI commented that PacifiCorp should provide a timeline with milestones for proposed programs and pilots as its grid design, operation, and maintenance as well as vegetation management plans are generally lacking traceable plan elements, including targets, percent of work in HFTD/HFRA, timelines, and milestones.
  - Energy Safety added Revision Notice issue RN-PC-26-02, RN-PC-26-04, RN-PC-26-06, and RN-PC-26-07 to require PacifiCorp to set clearer targets.
- GPI commented that PacifiCorp must have the capability to track and report on the number of past due vegetation management work orders as a function of risk based on location and priority.
  - Energy Safety issued RN-PC-26-08 to require PacifiCorp to prioritize vegetative work and track remediations so that it lowers the risk of leaving vegetation close to energized infrastructure unremediated because of open work orders.
  - Energy Safety PC-26B-17 will require PacifiCorp to align its remediation timeline for Priority Level 2 condition vegetation with its peers or justify why it has not. PC-26B-17 will also require PacifiCorp to update its procedures to reflect changes it made to its priority tagging plans in response to RN-PC-26-08 and PC-26B-17.
- GPI commented that PacifiCorp does not provide a working definition of developed versus "inaccessible" areas as it pertains to debris removal practices.
  - Energy Safety will require PacifiCorp to add these definitions to Section 9.5, Wood and Slash Management in its 2026-2028 Base WMP via a non-substantive errata.

- GPI commented that PacifiCorp failed to address PC-23B-16 and that PacifiCorp should be ordered to resubmit its 2026-2028 WMP with a comprehensive plan to establish a work order prioritization method and past due work order tracking capability no later than the end of 2026.
    - Energy Safety required PacifiCorp to address the issue via RN-PC-26-08. As a result, PacifiCorp will have its risk-based prioritization, remediation timelines, and tracking system in place by March 2026.

Public Comments on the PacifiCorp Revision Notice Response and Revised 2026-2028 Base WMP

Energy Safety published a Revision Notice for PacifiCorp on October 13, 2025.[24] PacifiCorp's Revision Notice Response was published on November 25, 2025. Opening comments on the Revision Notice Response were due December 11, 2025. Reply comments on the Revision Notice Response were due December 22, 2025.

Energy Safety did not receive any opening or reply comments on PacifiCorp's Revision Notice Response or revised 2026-2028 Base WMP R1.

[24] Revision Notice for PacifiCorp 2026-2028 Base WMP.

Public Comments on the Draft Decision on PacifiCorp 2026-2028 Base WMP

Energy Safety invited members of the public to provide comments on the draft Decision on the PacifiCorp 2026-2028 Base WMP. The following individuals and organizations submitted comments:

- PacifiCorp

Comments received on the draft Decision on the PacifiCorp 2026-2028 Base WMP can be viewed in the 2026-2028 Base WMP (2026-2028-Base-WMPs) docket log.[25]

Energy Safety made the following changes to the Decision on the PacifiCorp 2026-2028 Base WMP as a result of comments received from members of the public:

- PacifiCorp commented that it has already completed microgrid studies.
    - Energy Safety modified the discussion in Section 8.2.1.5 to clarify that a consulting company performed feasibility studies and that PacifiCorp is evaluating the results from the studies.
    - Energy Safety modified Section 8.5.4 to clarify that a consulting company performed feasibility studies and that PacifiCorp is required to provide the results of its evaluation of the microgrid feasibility studies.
- PacifiCorp commented that its Public Safety Partner Portal referenced in Section 11.1.2 is referred to as the PSP Portal.
    - Energy Safety corrected the reference to the PSPS Portal in Section 11.1.2 to the PSP Portal.
- PacifiCorp commented that it conducts annual exercises designed to test and strengthen elements of the PSPS Playbook, including notifications to AFN customers.
    - Energy Safety clarified in Section 11.1.3 that PacifiCorp conducts PSPS exercises.
- PacifiCorp commented that initiative ES-06 refers to the development of QA/QC processes related to PacifiCorp's updated Mobile Data Management System (MDMS) software, not the Vegetation Management (PVM) database.
    - Energy Safety modified Section 12.1.3 to state that PacifiCorp included a target to establish a QA/QC process and procedure for reviewing data entered into its updated MDMS software.

[25] 2026-2028 Base WMP Docket.

Appendix E.
Maturity Survey Results

The Energy Safety Electrical Corporation Wildfire Mitigation Maturity Model (Maturity Model) and 2025 Electrical Corporation Wildfire Mitigation Maturity Survey (Maturity Survey) together provide a quantitative method to assess electrical corporation wildfire risk mitigation capabilities and examine how electrical corporations propose to continuously improve in key areas of their WMP.

The Maturity Model consists of 38 individual capabilities, each relevant to an electrical corporation's ability to mitigate wildfire and PSPS risk within its service territory. Maturity levels range from 0 (below minimum requirements) to 4 (beyond best practice). The 38 capabilities are aggregated into seven categories. The seven categories are:

A. Risk Assessment and Mitigation Strategy
B. Situational Awareness and Forecasting
C. Grid Design, Inspections, and Maintenance
D. Vegetation Management and Inspections
E. Grid Operations and Protocols
F. Emergency Preparedness
G. Community Outreach and Engagement

PacifiCorp's responses to the Maturity Survey, listed by category, are depicted in the figure below.

Figure E-1. PacifiCorp 2025 Responses to the Maturity Survey

		1. Capability				2. Capability				3. Capability				4. Capability				5. Capability				6. Capability			
		2025	2026	2027	2028	2025	2026	2027	2028	2025	2026	2027	2028	2025	2026	2027	2028	2025	2026	2027	2028	2025	2026	2027	2028
A. Risk Assessment and Mitigation Strategy		1. Statistical weather, climate, and wildfire modeling				2. Calculation of wildfire and PSPS hazard and exposure to societal values				3. Calculation of community vulnerability to wildfire and PSPS				4. Calculation of risk and risk components				5. Risk event tracking and integration of lessons learned				6. Risk-informed wildfire mitigation strategy			
	Minimum of Sub-Cap.	1.0	1.0	1.0	1.0	0.0	1.0	1.0	1.0	0.0	1.0	1.0	1.0	1.0	1.0	1.0	1.0	0.0	0.0	0.0	0.0	0.0	1.0	1.0	1.0
	Average of Sub-Cap.	2.1	2.6	2.6	2.6	1.3	2.0	2.0	2.0	0.8	2.3	2.3	2.3	1.5	2.4	2.4	2.4	1.0	1.3	1.3	1.3	1.1	2.6	2.6	2.6
B. Situational Awareness and Forecasting		7. Ignition likelihood estimation				8. Weather forecasting ability				9. Wildfire spread forecasting				10. Data collection for near-real-time conditions				11. Wildfire detection and alarm systems				12. Centralized monitoring of real-time conditions			
	Minimum of Sub-Cap.	1.0	1.0	1.0	1.0	0.0	0.0	0.0	0.0	1.0	2.0	2.0	2.0	1.0	1.0	1.0	1.0	0.0	0.0	0.0	0.0	2.0	2.0	2.0	2.0
	Average of Sub-Cap.	2.6	2.9	2.9	2.9	2.5	2.9	2.9	2.9	2.7	3.1	3.1	3.1	2.4	2.7	2.7	2.7	2.2	2.2	2.2	2.2	3.6	3.6	3.6	3.6
C. Grid Design, Inspections, and Maintenance		13. Asset inventory and condition database				14. Asset inspections				15. Asset maintenance and repair				16. Grid design and resiliency				17. Asset and grid personnel training and quality							
	Minimum of Sub-Cap.	0.0	0.0	0.0	0.0	1.0	1.0	1.0	1.0	1.0	1.0	1.0	1.0	0.0	1.0	1.0	1.0	1.0	1.0	1.0	1.0				
	Average of Sub-Cap.	1.8	1.8	2.0	2.0	2.0	2.0	2.0	2.0	1.8	1.8	1.8	1.8	2.0	2.3	2.8	2.8	2.8	2.8	2.8	2.8				
D. Vegetation Management and Inspections		18. Vegetation inventory				19. Vegetation inspections				20. Vegetation treatment				21. Vegetation personnel training and quality				22. Best Management Practices for Transmission Rights-Of-Ways (ROWs)							
	Minimum of Sub-Cap.	1.0	1.0	1.0	1.0	1.0	1.0	1.0	1.0	1.0	1.0	2.0	2.0	0.0	0.0	0.0	0.0	2.0	2.0	2.0	2.0				
	Average of Sub-Cap.	2.0	2.3	2.3	2.3	1.3	2.0	2.0	2.0	2.3	2.3	2.7	2.7	0.5	0.8	1.0	1.3	2.3	2.3	2.3	2.3				
E. Grid Operations and Protocols		23. Protective equipment and device settings				24. Incorporation of ignition risk factors in grid control				25. PSPS operating model				26. Protocols for PSPS re-energization				27. Ignition prevention and suppression							
	Minimum of Sub-Cap.	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	3.0	3.0	3.0	3.0	4.0	4.0	4.0	4.0	2.0	2.0	2.0	2.0				
	Average of Sub-Cap.	1.8	1.8	1.8	2.2	1.6	1.6	1.6	1.8	3.7	3.7	3.7	3.7	4.0	4.0	4.0	4.0	2.3	2.3	2.3	2.3				
F. Emergency Preparedness		28. Wildfire and PSPS emergency & disaster preparedness plan				29. Collaboration and coordination with public safety partners				30. Public emergency communication strategy				31. Preparedness and planning for service restoration				32. Customer support in wildfire and PSPS emergencies				33. Learning after wildfires and PSPS events			
	Minimum of Sub-Cap.	1.0	3.0	3.0	4.0	4.0	4.0	4.0	4.0	0.0	0.0	0.0	0.0	1.0	2.0	2.0	2.0	1.0	1.0	1.0	1.0	2.0	2.0	2.0	2.0
	Average of Sub-Cap.	3.0	3.8	3.8	4.0	4.0	4.0	4.0	4.0	2.2	2.4	2.6	2.6	2.3	3.0	3.0	3.0	1.0	1.0	1.0	1.0	2.0	2.0	2.0	2.0
G. Community Outreach and Engagement		34. Public outreach and education awareness				35. Public engagement in electrical corporation wildfire mitigation planning				36. Engagement with AFN and socially vulnerable populations				37. Collaboration on local wildfire mitigation planning				38. Cooperation and best practice sharing with other electrical corporations							
	Minimum of Sub-Cap.	2.0	2.0	2.0	2.0	3.0	3.0	3.0	3.0	0.0	1.0	1.0	1.0	3.0	3.0	3.0	3.0	2.0	2.0	2.0	2.0				
	Average of Sub-Cap.	3.0	3.0	3.0	3.0	3.7	3.7	3.7	3.7	1.3	2.0	2.0	2.0	3.5	3.5	3.5	3.5	2.7	2.7	2.7	2.7				

Appendix F. Definitions

Unless otherwise expressly stated, the following words and terms, for the purposes of this Decision, have the meanings shown in this chapter.

Terms Defined in Other Codes

Where terms are not defined in this Decision and are defined in the Government Code, Public Utilities Code, or Public Resources Code, such terms have the meanings ascribed to them in those codes.

Terms Not Defined

Where terms are not defined through the methods authorized by this section, such terms have ordinarily accepted meanings such as the context implies.

Definition of Terms

Term	Definition
Access and functional needs population (AFN)	Individuals, including, but not limited to, those who have developmental or intellectual disabilities, physical disabilities, chronic conditions, or injuries; who have limited English proficiency or are non-English speaking; who are older adults, children, or people living in institutionalized settings; or who are low income, homeless, or transportation disadvantaged, including, but not limited to, those who are dependent on public transit or are pregnant. (Gov. Code, § 8593.3(f)(1).)
Asset (utility)	Electric lines, equipment, or supporting hardware.
Benchmarking	A comparison between one electrical corporation's protocols, technologies used, or mitigations implemented, and other electrical corporations' similar endeavors.
Burn likelihood	The likelihood that a wildfire with an ignition point will burn at a specific location within the service territory based on a probabilistic set of weather profiles, vegetation, and topography.

Term	Definition
Catastrophic wildfire	A fire that caused at least one death, damaged over 500 structures, or burned over 5,000 acres.
Circuit miles	The total length in miles of separate transmission and/or distribution circuits, regardless of the number of conductors used per circuit (i.e., different phases).
Circuit segment	A specific portion of an electrical circuit that can be separated or disconnected from the rest of the system without affecting the operation of other parts of the network. This isolation is typically achieved using switches, circuit breakers, or other control mechanisms.
Consequence	The adverse effects from an event, considering the hazard intensity, community exposure, and local vulnerability.
Contact from object ignition likelihood	The likelihood that a non-vegetative object (such as a balloon or vehicle) will contact utility-owned equipment and result in an ignition.
Contact from vegetation likelihood of ignition	The likelihood that vegetation will contact utility-owned equipment and result in an ignition.
Contractor	Any individual in the temporary and/or indirect employ of the electrical corporation whose limited hours and/or time-bound term of employment are not considered “full-time” for tax and/or any other purposes.
Critical facilities and infrastructure	Facilities and infrastructure that are essential to public safety and that require additional assistance and advance planning to ensure resiliency during PSPS events. These include the following: Emergency services sector: • Police stations • Fire stations • Emergency operations centers

Term	Definition
	• Public safety answering points (e.g., 9-1-1 emergency services) Government facilities sector: • Schools • Jails and prisons Health care and public health sector: • Public health departments • Medical facilities, including hospitals, skilled nursing facilities, nursing homes, blood banks, health care facilities, dialysis centers, and hospice facilities (excluding doctors' offices and other non-essential medical facilities) Energy sector: • Public and private utility facilities vital to maintaining or restoring normal service, including, but not limited to, interconnected publicly owned electrical corporations and electric cooperatives • Water and wastewater systems sector: • Facilities associated with provision of drinking water or processing of wastewater, including facilities that pump, divert, transport, store, treat, and deliver water or wastewater Communications sector: • Communication carrier infrastructure, including selective routers, central offices, head ends, cellular switches, remote terminals, and cellular sites Chemical sector: • Facilities associated with manufacturing, maintaining, or distributing hazardous materials and chemicals (including Category N-Customers as defined in D.01-06-085) Transportation sector:

Term	Definition
	• Facilities associated with transportation for civilian and military purposes: automotive, rail, aviation, maritime, or major public transportation (D.19-05-042 and D.20-05-051)
Customer hours	Total number of customers, multiplied by average number of hours (e.g., of power outage).
Dead fuel moisture	The moisture content of dead organic fuels, expressed as a percentage of the oven dry weight of the sample, that is controlled entirely by exposure to environmental conditions.
Detailed inspection	In accordance with General Order (GO) 165, an inspection where individual pieces of equipment and structures are carefully examined, visually and through routine diagnostic testing, as appropriate, and (if practical and if useful information can be so gathered) opened, and the condition of each is rated and recorded.
Disaster	A serious disruption of the functioning of a community or a society at any scale due to hazardous events interacting with conditions of exposure, vulnerability, and capacity, leading to one or more of the following: human, material, economic, and environmental losses and impacts. The effect of the disaster can be immediate and localized but is often widespread and could last a long time. The effect may test or exceed the capacity of a community or society to cope using its own resources. Therefore, it may require assistance from external sources, which could include neighboring jurisdictions or those at the national or international levels. (United Nations Office for Disaster Risk Reduction [UNDRR].)
Discussion-based exercise	Exercise used to familiarize participants with current plans, policies, agreements, and procedures or to develop new plans, policies, agreements, and procedures. Often includes seminars, workshops, tabletop exercises, and games.
Electrical corporation	Every corporation or person owning, controlling, operating, or managing any electric plant for compensation within California,

Term	Definition
	except where the producer generates electricity on or distributes it through private property solely for its own use or the use of its tenants and not for sale or transmission to others.
Emergency	Any incident, whether natural, technological, or human caused, that requires responsive action to protect life or property but does not result in serious disruption of the functioning of a community or society. (FEMA/UNDRR.)
Enhanced inspection	Inspection whose frequency and thoroughness exceed the requirements of a detailed inspection, particularly if driven by risk calculations.
Equipment caused ignition likelihood	The likelihood that utility-owned equipment will cause an ignition through either normal operation (such as arcing) or failure.
Exercise	An instrument to train for, assess, practice, and improve performance in prevention, protection, response, and recovery capabilities in a risk-free environment. (FEMA.)
Exposure	The presence of people, infrastructure, livelihoods, environmental services and resources, and other high-value assets in places that could be adversely affected by a hazard.
Fire hazard index	A numerical rating for specific fuel types, indicating the relative probability of fires starting and spreading, and the probable degree of resistance to control; similar to burning index, but without effects of wind speed.[26]
Fire potential index (FPI)	Landscape scale index used as a proxy for assessing real-time risk of a wildfire under current and forecasted weather conditions.
Fire season	The time of year when wildfires are most likely for a given geographic region due to historical weather conditions, vegetative characteristics, and impacts of climate change. Each electrical corporation defines the fire season(s) across its service

[26] Glossary of Wildland Fire.

Term	Definition
	territory based on a recognized fire agency definition for the specific region(s) in California.
Fireline intensity	The rate of heat release per unit time per unit length of fire front. Numerically, it is the product of the heat yield, the quantity of fuel consumed in the fire front, and the rate of spread.[27]
Frequency	The anticipated number of occurrences of an event or hazard over time.
Frequent PSPS events	Three or more PSPS events per calendar year per line circuit.
Fuel continuity	The degree or extent of continuous or uninterrupted distribution of fuel particles in a fuel bed thus affecting a fire's ability to sustain combustion and spread. This applies to aerial fuels as well as surface fuels.[28]
Fuel density	Mass of fuel (vegetation) per area that could combust in a wildfire.
Fuel management	Act or practice of controlling flammability and reducing resistance to control of wildland fuels through mechanical, chemical, biological, or manual means, or by fire, in support of land management objectives.[29]
Fuel moisture content	Amount of moisture in a given mass of fuel (vegetation), measured as a percentage of its dry weight.
Full-time employee (FTE)	Any individual in the ongoing and/or direct employ of the electrical corporation whose hours and/or term of employment are considered “full-time” for tax and/or any other purposes.
GO 95 nonconformance	Condition of a utility asset that does not meet standards established by GO 95.

[27] Glossary of Wildland Fire.

[28] Glossary of Wildland Fire.

[29] Glossary of Wildland Fire.

Term	Definition
Grid hardening	Actions (such as equipment upgrades, maintenance, and planning for more resilient infrastructure) taken in response to the risk of undesirable events (such as outages) or undesirable conditions of the electrical system to reduce or mitigate those events and conditions, informed by an assessment of the relevant risk drivers or factors.
Grid topology	General design of an electric grid, whether looped or radial, with consequences for reliability and ability to support PSPS (e.g., ability to deliver electricity from an additional source).
Hazard	A condition, situation, or behavior that presents the potential for harm or damage to people, property, the environment, or other valued resources.
Hazard tree	A tree that is, or has portions that are, dead, dying, rotten, diseased, or otherwise has a structural defect that may fail in whole or in part and damage utility facilities should it fail
High Fire Threat District (HFTD)	Areas of the state designated by the CPUC as having elevated wildfire risk, where each utility must take additional action (per GO 95, GO 165, and GO 166) to mitigate wildfire risk. (D.17-01-009.)
High Fire Risk Area (HFRA)	Areas that the electrical corporation has deemed at high risk from wildfire, independent of HFTD designation.
Highly rural region	Area with a population of less than seven persons per square mile, as determined by the United States Bureau of the Census. For purposes of the WMP, “area” must be defined as a census tract.
High-risk species	Species of vegetation that (1) have a higher risk of either coming into contact with powerlines or causing an outage or ignition, or (2) are easily ignitable and within close proximity to potential arcing, sparks, and/or other utility equipment thermal failures. The status of species as “high-risk” must be a function of species-specific characteristics, including growth rate; failure rates of limbs, trunk, and/or roots (as compared to other species); height at maturity; flammability; and vulnerability to disease or insects.

Term	Definition
High wind warning (HWW)	Level of wind risk from weather conditions, as declared by the National Weather Service (NWS). For historical NWS data, refer to the Iowa State University archive of NWS watches/warnings.
HWW overhead (OH) circuit mile day	Sum of OH circuit miles of utility grid subject to a HWW each day within a given time period, calculated as the number of OH circuit miles under a HWW multiplied by the number of days those miles are under said HWW. For example, if 100 OH circuit miles are under a HWW for one day, and 10 of those miles are under the HWW for an additional day, then the total HWW OH circuit mile days would be 110.
Ignition likelihood	The total anticipated annualized number of ignitions resulting from electrical corporation-owned assets at each location in the electrical corporation's service territory. This considers probabilistic weather conditions, type and age of equipment, and potential contact of vegetation and other objects with electrical corporation assets. This should include the use of any method used to reduce the likelihood of ignition. For example, the use of protective equipment and device settings (PEDS) to reduce the likelihood of an ignition upon an initiating event.
Incident command system (ICS)	A standardized on-scene emergency management concept specifically designed to allow its user(s) to adopt an integrated organizational structure equal to the complexity and demands of single or multiple incidents, without being hindered by jurisdictional boundaries.
Initiative activity	See mitigation activity.
Initiative construction standards	The standard specifications, special provisions, standards of practice, standard material and construction specifications, construction protocols, and construction methods that an electrical corporation applies to activities undertaken by the electrical corporation pursuant to a WMP initiative in a given compliance period.
Level 1 finding	In accordance with GO 95, an immediate safety and/or reliability risk with high probability for significant impact.

Term	Definition
Level 2 finding	In accordance with GO 95, a variable safety and/or reliability risk (non-immediate and with high to low probability for significant impact).
Level 3 finding	In accordance with GO 95, an acceptable safety and/or reliability risk.
Limited English proficiency (LEP) population	Population with limited English working proficiency based on the International Language Roundtable scale.
Line miles	The number of miles of transmission and/or distribution conductors, including the length of each phase and parallel conductor segment.
Live fuel moisture content	Moisture content within living vegetation, which can retain water longer than dead fuel.
Locally relevant	In disaster risk management, generally understood as the cope at which disaster risk strategies and initiatives are considered the most effective at achieving desired outcomes. This tends to be the level closest to impacting residents and communities, reducing existing risks, and building capacity, knowledge, and normative support. Locally relevant scales, conditions, and perspectives depend on the context of application.
Match-drop simulation	Wildfire simulation method forecasting propagation and consequence/impact based on an arbitrary ignition.
Memorandum of Agreement (MOA)	A document of agreement between two or more agencies establishing reciprocal assistance to be provided upon request (and if available from the supplying agency) and laying out the guidelines under which this assistance will operate. It can also be a cooperative document in which parties agree to work together on an agreed-upon project or meet an agreed objective.
Mitigation	Undertakings to reduce the loss of life and property from natural and/or human-caused disasters by avoiding or lessening the impact of a disaster and providing value to the public by creating

Term	Definition
	safer communities. Encompasses mitigation categories, mitigation initiatives, and mitigation activities within the WMP.
Mitigation activity	A measure that contributes to or accomplishes a mitigation initiative designed to reduce the consequences and/or probability of wildfire or outage event. For example, covered conductor installation is a mitigation activity under the mitigation initiative of Grid Design and System Hardening.
Mitigation category	The highest subset in the WMP mitigation hierarchy. There are five Mitigation Categories in total: Grid Design, Operations, and Maintenance; Vegetation Management and Inspections; Situational Awareness and Forecasting; Emergency Preparedness; and Enterprise Systems. Contains mitigation initiatives and any subsequent mitigation activities.
Mitigation initiative	Efforts within a mitigation category either proposed or in process, designed to reduce the consequences and/or probability of wildfire or outage event. For example, Asset Inspection is a mitigation initiative under the mitigation category of Grid Design, Operations, and Maintenance.
Model uncertainty	The amount by which a calculated value might differ from the true value when the input parameters are known (i.e., limitation of the model itself based on assumptions).[30]
Mutual aid	Voluntary aid and assistance by the provision of services and facilities, including but not limited to electrical corporations, communication, and transportation. Mutual aid is intended to provide adequate resources, facilities, and other support to an electrical corporation whenever its own resources prove inadequate to cope with a given situation.
National Incident Management System (NIMS)	A systematic, proactive approach to guide all levels of government, nongovernment organizations, and the private sector to work together to prevent, protect against, mitigate, respond to, and recover from the effects of incidents. NIMS

[30] Adapted from: Substantiating a Fire Model for a Given Application.

Term	Definition
	provides stakeholders across the whole community with the shared vocabulary, systems, and processes to successfully deliver the capabilities described in the National Preparedness System. NIMS provides a consistent foundation for dealing with all incidents, ranging from daily occurrences to incidents requiring a coordinated federal response.
Operations-based exercise	Type of exercise that validates plans, policies, agreements, and procedures; clarifies roles and responsibilities; and identifies resource gaps in an operational environment. Often includes drills, functional exercises (FEs), and full-scale exercises (FSEs).
Outage program risk	The measure of reliability impacts from wildfire mitigation related outages at a given location.
Overall utility risk	The comprehensive risk due to both wildfire and PSPS incidents across a utility's territory; the aggregate potential of adverse impacts to people, property, critical infrastructure, or other valued assets in society.
Overall utility risk, PSPS risk	See Outage program risk.
Parameter uncertainty	The amount by which a calculated value might differ from the true value based on unknown input parameters. (Adapted from Society of Fire Protection Engineers [SFPE] guidance.)
Patrol inspection	In accordance with GO 165, a simple visual inspection of applicable utility equipment and structures designed to identify obvious structural problems and hazards. Patrol inspections may be carried out in the course of other company business.
Performance metric	A quantifiable measurement that is used by an electrical corporation to indicate the extent to which its WMP is driving performance outcomes.
Population density	Population density is calculated using the American Community Survey (ACS) one-year estimate for the corresponding year or, for

Term	Definition
	years with no such ACS estimate available, the estimate for the immediately preceding year.
Preparedness	A continuous cycle of planning, organizing, training, equipping, exercising, evaluating, and taking corrective action in an effort to ensure effective coordination during incident response. Within the NIMS, preparedness focuses on planning, procedures and protocols, training and exercises, personnel qualification and certification, and equipment certification.
Priority essential services	Critical first responders, public safety partners, critical facilities and infrastructure, operators of telecommunications infrastructure, and water electrical corporations/agencies.
Property	Private and public property, buildings and structures, infrastructure, and other items of value that may be destroyed by wildfire, including both third-party property and utility assets.
Protective equipment and device settings (PEDS)	The electrical corporation's procedures for adjusting the sensitivity of grid elements to reduce wildfire risk, other than automatic reclosers (such as circuit breakers, switches, etc.). For example, PG&E's "Enhanced Powerline Safety Settings" (EPSS).
PEDS outage consequence	The total anticipated adverse effects from an outage occurring while increased sensitivity settings on a protective device are enabled at a specific location, including reliability and associated safety impacts.
PEDS outage exposure potential	The potential physical, social, or economic impact of an outage occurring when PEDS are enabled on people, property, critical infrastructure, livelihoods, health, local economies, and other high-value assets.
PEDS outage likelihood	The likelihood of an outage occurring while increased sensitivity settings on a protective device are enabled at a specific location given a probabilistic set of environmental conditions.
PEDS outage risk	The total expected annualized impacts from PEDS enablement at a specific location.

Term	Definition
PEDS outage vulnerability	The susceptibility of people or a community to adverse effects of an outage occurring when PEDS are enabled, including all characteristics that influence their capacity to anticipate, cope with, resist, and recover from the related adverse effects (e.g., high AFN population, poor energy resiliency, low socioeconomics).
PSPS consequence	The total anticipated adverse effects of a PSPS for a community. This considers the PSPS exposure potential and inherent PSPS vulnerabilities of communities at risk.
PSPS event	The period from notification of the first public safety partner of a planned public safety PSPS to re-energization of the final customer.
PSPS exposure potential	The potential physical, social, or economic impact of a PSPS event on people, property, critical infrastructure, livelihoods, health, local economies, and other high-value assets.
PSPS likelihood	The likelihood of an electrical corporation requiring a PSPS given a probabilistic set of environmental conditions.
PSPS risk	The total expected annualized impacts from PSPS at a specific location. This considers two factors: (1) the likelihood a PSPS will be required due to environmental conditions exceeding design conditions, and (2) the potential consequences of the PSPS for each affected community, considering exposure potential and vulnerability.
PSPS vulnerability	The susceptibility of people or a community to adverse effects of a PSPS event, including all characteristics that influence their capacity to anticipate, cope with, resist, and recover from the adverse effects of a PSPS event (e.g., high AFN population, poor energy resiliency, low socioeconomics).
Public safety partners	First/emergency responders at the local, state, and federal levels; water, wastewater, and communication service providers; community choice aggregators (CCAs); affected publicly owned electrical corporations/electrical cooperatives; tribal

Term	Definition
	governments; Energy Safety; the Commission; the California Office of Emergency Services; and CAL FIRE.
Qualitative target	Specific, measurable, achievable, realistic, and timely outcomes for the overall WMP strategy, or mitigation initiatives and activities that a utility can implement to satisfy the primary goals and subgoals of the WMP program.
Quantitative target	A forward-looking, quantifiable measurement of work to which an electrical corporation commits to in its WMP. Electrical corporations will show progress toward completing targets in subsequent reports, including data submissions and WMP Updates.
RFW OH circuit mile day	Sum of OH circuit miles of utility grid subject to RFW each day within a given time period, calculated as the number of OH circuit miles under RFW multiplied by the number of days those miles are under said RFW. For example, if 100 OH circuit miles are under RFW for one day, and 10 of those miles are under RFW for an additional day, then the total RFW OH circuit mile days would be 110.
Risk	A measure of the anticipated adverse effects from a hazard considering the consequences and frequency of the hazard occurring. [31]
Risk component	A part of an electric corporation's risk analysis framework used to determine overall utility risk.
Risk evaluation	The process of comparing the results of a risk analysis with risk criteria to determine whether the risk and/or its magnitude is acceptable or tolerable. (ISO 31000:2009.)

[31] Adapted from: Introduction to International Disaster Management.

Term	Definition
Risk event	An event with probability of ignition, such as wire down, contact with objects, line slap, event with evidence of heat generation, or other event that causes sparking or has the potential to cause ignition. The following all qualify as risk events: • Ignitions • Outages not caused by vegetation • Outages caused by vegetation • Wire-down events • Faults • Other events with potential to cause ignition
Risk management	Systematic application of management policies, procedures, and practices to the tasks of communication, consultation, establishment of context, and identification, analysis, evaluation, treatment, monitoring, and review of risk. (ISO 31000.)
Rule	Section of Public Utilities Code requiring a particular activity or establishing a particular threshold.
Rural region	In accordance with GO 165, area with a population of less than 1,000 persons per square mile, as determined by the U.S. Bureau of the Census. For purposes of the WMP, "area" must be defined as a census tract.
Seminar	An informal discussion, designed to orient participants to new or updated plans, policies, or procedures (e.g., to review a new external communications standard operating procedure).
Sensitivity analysis	Process used to determine the relationships between the uncertainty in the independent variables ("input") used in an analysis and the uncertainty in the resultant dependent variables ("output"). (SFPE guidance.)

Term	Definition
Situational Awareness	An on-going process of gathering information by observation and by communication with others. This information is integrated to create an individual's perception of a given situation.[32]
Slash	Branches or limbs less than four inches in diameter, and bark and split products debris left on the ground as a result of utility vegetation management. [33]
Span	The space between adjacent supporting poles or structures on a circuit consisting of electric lines and equipment. "Span level" refers to asset-scale granularity.
Tabletop exercise (TTX)	A discussion-based exercise intended to stimulate discussion of various issues regarding a hypothetical situation. Tabletop exercises can be used to assess plans, policies, and procedures or to assess types of systems needed to guide the prevention of response to, or recovery from a defined incident.
Trees with strike potential	Trees that could either, in whole or in part, “fall in” to a power line or have portions detach and “fly in” to contact a power line in high-wind conditions.
Uncertainty	The amount by which an observed or calculated value might differ from the true value. For an observed value, the difference is “experimental uncertainty”; for a calculated value, it is “model” or “parameter uncertainty.” (Adapted from SFPE guidance.)
Urban region	In accordance with GO 165, area with a population of more than 1,000 persons per square mile, as determined by the U.S. Bureau of the Census. For purposes of the WMP, “area” must be defined as a census tract.

[32] Glossary of Wildland Fire.

[33] Pub. Res. Code § 4525.7.

Term	Definition
Utility-related ignition	An event that meets the criteria for a reportable event subject to fire-related reporting requirements.[34]
Validation	Process of determining the degree to which a calculation method accurately represents the real world from the perspective of the intended uses of the calculation method without modifying input parameters based on observations in a specific scenario. (Adapted from ASTM E 1355.)
Vegetation management (VM)	The assessment, intervention, and management of vegetation, including pruning and removal of trees and other vegetation around electrical infrastructure for safety, reliability, and risk reduction.
Verification	Process to ensure that a model is working as designed, that is, that the equations are being properly solved. Verification is essentially a check of the mathematics. (SFPE guidance.)
Vulnerability	The propensity or predisposition of a community to be adversely affected by a hazard, including the characteristics of a person, group, or service and their situation that influences their capacity to anticipate, cope with, resist, and recover from the adverse effects of a hazard.
Wildfire consequence	The total anticipated adverse effects from a wildfire on a community that is reached. This considers the wildfire hazard intensity, the wildfire exposure potential, and the inherent wildfire vulnerabilities of communities at risk.
Wildfire exposure potential	The potential physical, social, or economic impact of wildfire on people, property, critical infrastructure, livelihoods, health, environmental services, local economies, cultural/historical resources, and other high-value assets. This may include direct or indirect impacts, as well as short- and long-term impacts.

[34] D.14-02-015, page C-3.

Term	Definition
Wildfire hazard intensity	The potential intensity of a wildfire at a specific location within the service territory given a probabilistic set of weather profiles, vegetation, and topography.
Wildfire likelihood	The total anticipated annualized number of fires reaching each spatial location resulting from utility-related ignitions at each location in the electrical corporation service territory. This considers the ignition likelihood and the likelihood that an ignition will transition into a wildfire based on the probabilistic weather conditions in the area.
Wildfire mitigation strategy	Overview of the key mitigation initiatives at enterprise level and component level across the electrical corporation's service territory, including interim strategies where long-term mitigation initiatives have long implementation timelines. This includes a description of the enterprise-level monitoring and evaluation strategy for assessing overall effectiveness of the WMP.
Wildfire risk	The total expected annualized impacts from ignitions at a specific location. This considers the likelihood that an ignition will occur, the likelihood the ignition will transition into a wildfire, and the potential consequences—considering hazard intensity, exposure potential, and vulnerability—the wildfire will have for each community it reaches.
Wildfire spread likelihood	The likelihood that a fire with a nearby but unknown ignition point will transition into a wildfire and will spread to a location in the service territory based on a probabilistic set of weather profiles, vegetation, and topography.
Wildfire vulnerability	The susceptibility of people or a community to adverse effects of a wildfire, including all characteristics that influence their capacity to anticipate, cope with, resist, and recover from the adverse effects of a wildfire (e.g., AFN customers, Social Vulnerability Index, age of structures, firefighting capacities).
Wildland-urban interface (WUI)	The line, area, or zone where structures and other human development meet or intermingle with undeveloped wildland or vegetation fuels (National Wildfire Coordinating Group).

Term	Definition
Wire down	Instance where an electric transmission or distribution conductor is broken and falls from its intended position to rest on the ground or a foreign object.
Work order	A prescription for asset or vegetation management activities resulting from asset or vegetation management inspection findings.
Workshop	Discussion that resembles a seminar but is employed to build specific products, such as a draft plan or policy (e.g., a multi-year training and exercise plan).