



May 22, 2026

To: Carrie Laird
VP of Wildfire Mitigation and Emergency Operations
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Portland, OR 97232

SUBJECT: PacifiCorp's 2024 Vegetation Management Audit (VMA) Report

Pursuant to the requirements of California Public Utilities Code section 8386.3(b)(5)(C), the Office of Energy Infrastructure Safety (Energy Safety) has completed its audit of PacifiCorp's 2024 Vegetation Management activities included in the 2023-2025 Wildfire Mitigation Plan (WMP).

As described in the attached audit report, Energy Safety concluded that the method and urgency of PacifiCorp's execution of necessary corrective actions to address deficiencies in its vegetation management program have not demonstrated a commitment to risk reduction and program maturity. In the 2024 performance year, PacifiCorp demonstrated that it either completed or achieved the objective of seven of the 13 vegetation management initiatives. PacifiCorp did not complete and did not provide sufficient corrective actions for six vegetation management initiatives: 8.2.3.1.1 Wood and Slash Management, 8.2.3.1.2 Pole Clearing, 8.2.3.2 Clearance, 8.2.3.5 High-Risk Species, 8.2.5. Quality Assurance and Quality Control, and 8.2.6 Open Work Orders.

Pursuant to statutory requirements, a copy of this report is issued to PacifiCorp, published on Energy Safety's 2024 VM Audits Docket, and provided to the California Public Utilities Commission (CPUC).

Sincerely,

A handwritten signature in cursive script that reads 'Sheryl Bilbrey'.

Sheryl Bilbrey
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Attachment: PacifiCorp 2024 VMA Report



OFFICE OF ENERGY INFRASTRUCTURE SAFETY
**2024 VEGETATION MANAGEMENT
AUDIT REPORT**
PACIFICORP

May 2026

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EXECUTIVE SUMMARY

Pursuant to Public Utilities Code section 8386.3(b)(5)(A), the Office of Energy Infrastructure Safety (Energy Safety) may audit the vegetation management work performed by, or on behalf of, the electrical corporation following the end of the performance period.

The PacifiCorp 2023-2025 Wildfire Mitigation Plan (WMP) had 13 vegetation management initiatives in six programmatic areas. Energy Safety provided its Vegetation Management Audit (VMA) of PacifiCorp's 2024 work related to its vegetation management commitments in its WMP on December 19, 2025 (included in Appendix 1).¹

The VMA identified that PacifiCorp did not provide sufficient documentation that all work was complete for nine of the 13 vegetation management initiatives. PacifiCorp provided its Corrective Action Plan (CAP) on January 30, 2026 (included in Appendix 2)² as well as supplemental documentation regarding the status of corrective actions introduced in its CAP on April 1, 2026.³ This documentation included additional data, clarifications, and corrective actions to address the deficiencies identified for three of the nine deficient initiatives identified in the VMA.

PacifiCorp provided sufficient documentation to demonstrate that seven of the 13 vegetation management initiatives from the 2023-2025 WMP were either successfully implemented in 2024 or PacifiCorp provided sufficient corrective actions to address them. PacifiCorp has outstanding deficiencies in six of the 13 VM initiatives: 8.2.3.1.1 Wood and Slash Management, 8.2.3.1.2 Pole Clearing, 8.2.3.2 Clearance, 8.2.3.5 High-Risk Species, 8.2.5. Quality Assurance and Quality Control, and 8.2.6 Open Work Orders. Overall, PacifiCorp's execution of necessary corrective actions to address deficiencies in its VM program has not demonstrated a commitment to risk reduction and program maturity. Energy Safety expects PacifiCorp to improve its VM program and decrease risk on its system.

¹ Office of Energy Infrastructure Safety, 2024 VMA of PacifiCorp Utilities (August 28, 2025), (Appendix 1).

² PacifiCorp, 2024 SVM Audit Corrective Action Plan Rev.0 (January 30, 2026), (Appendix 2).

³ "Follow-up to March 30 meeting on Mobile Data Management System (MDMS) roll-back" e-mail From Energy Safety to PacifiCorp. April 1, 2026.

1. INTRODUCTION

Pursuant to Public Utilities Code section 8386.3(b)(5)(A), the Office of Energy Infrastructure Safety (Energy Safety) may audit the vegetation management work performed by, or on behalf of, the electrical corporation following the end of the performance period. The VMA includes three phases:

1. **The audit.** The VMA identifies deficiencies in the electrical corporation's implementation of the vegetation management commitments in its WMP. Energy Safety provided the 2024 VMA to PacifiCorp on December 19, 2025, via electronic mail.⁴ The VMA is included in Appendix 1.
2. **The CAP.** Energy Safety then provides the electrical corporation time to respond to and develop corrective actions for any deficiency specified in the VMA and to provide this response in its CAP. The electrical corporation may provide supplemental data, additional supporting documentation, clarifying statements, and corrective actions for consideration by Energy Safety for use in its final determination of the electrical corporation's performance relative to its WMP vegetation management commitments. PacifiCorp provided its CAP to Energy Safety on January 30, 2026.⁵ PacifiCorp's CAP is included in Appendix 2.
3. **The audit report.** Energy Safety then reviews the CAP and issues a VMA Report to the electrical corporation identifying any outstanding deficiency in the electrical corporation's implementation of its vegetation management commitments in the WMP. The VMA Report is publicly available on Energy Safety's E-Filing System on the 2024 VM Audits Docket. The VMA and CAP (items 1 and 2 above) are included as appendices within the VMA report. This VMA report document concludes the VMA process for the 2024 performance year.

The VMA report document is organized as follows:

- Section 2 includes a summary of the deficiencies identified during the VMA, PacifiCorp's CAP, and Energy Safety's determination of outstanding deficiencies in PacifiCorp's implementation of or planned corrective actions for the 2024 WMP vegetation management commitments.

⁴ Office of Energy Infrastructure Safety, 2024 VMA of PacifiCorp Utilities (August 28, 2025), (Appendix 1).

⁵ PacifiCorp, 2024 SVM Audit Corrective Action Plan Rev.0 (January 30, 2026), (Appendix 2).

- Section 3 includes a discussion of PacifiCorp’s vegetation management program maturity and programmatic performance relative to the achievement of the objectives of WMP in 2024.
- Section 4 is Energy Safety’s conclusion regarding PacifiCorp’s completion of all work associated with its WMP commitments and program performance for 2024.

2. PACIFICORP’S 2024 VMA FINDINGS

PacifiCorp’s 2023-2025 WMP identifies the objectives, preventative strategies, and programs that PacifiCorp has implemented to minimize the risk that its infrastructure will cause catastrophic wildfire. Energy Safety analyzed each of the thirteen vegetation management initiatives listed in Section 8.2 (Vegetation Management and Inspections) of PacifiCorp’s 2023-2025 WMP⁶ as part of the VMA. Each initiative includes one or more commitments. These commitments include both quantitative targets (e.g., completion of a specified number of inspections) and narrative, but verifiable, statements (e.g., implementation of personnel training programs). Energy Safety identified the WMP quantitative commitments and narrative statements within each initiative and determined whether PacifiCorp had completed all work associated with each commitment in performance year 2024. Energy Safety’s determination of whether all work was complete was based on data and documentation submitted by PacifiCorp.

As stated in the VMA, Energy Safety determined that an initiative was “complete” if PacifiCorp provided sufficient data or supporting information demonstrating completion of all commitments (targets and/or statements) within that initiative. If any commitment was incomplete or insufficiently documented, Energy Safety determined that the initiative was “deficient.” Energy Safety’s VMA found that PacifiCorp provided data and documentation to support completion of work for four of the 13 initiatives and did not provide information and documentation to support completion of work for nine initiatives.

Of the nine initiatives identified as deficient in the VMA, PacifiCorp’s provided documentation to demonstrate that it completed all work associated with three initiatives: 8.2.2. Vegetation Management Inspections, 8.2.3.4 Substation Defensible Space, and 8.2.7 Workforce Planning.⁷ However, PacifiCorp did not provide additional documentation to support completion of, or sufficient corrective actions for six initiatives: 8.2.3.1.1 Wood and Slash Management, 8.2.3.1.2 Pole Clearing, 8.2.3.2 Clearance, 8.2.3.5 High-Risk Species, 8.2.5

⁶ PacifiCorp, [2023-2025 Base Wildfire Mitigation Plan](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57090&shareable=true), Published July 26, 2024, p. 230 URL: (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57090&shareable=true).

⁷ PacifiCorp, 2024 SVM Audit Corrective Action Plan Rev.0 (January 30, 2026), (Appendix 2).

Quality Assurance and Quality Control, and 8.2.6 Open Work Orders. These deficiencies are summarized in Table 1.

To make this determination, Energy Safety reviewed both PacifiCorp's CAP⁸ as well as supplemental information provided on March 30 and April 22, 2026.⁹ The corrective actions described in the CAP for three of the six incomplete or insufficiently corrected initiatives (8.2.3.5 High-Risk Species, 8.2.5. Quality Assurance and Quality Control, and 8.2.6 Open Work Orders) relied on an upgrade to PacifiCorp's Mobile Data Management System (MDMS). However, on March 30, 2026, after PacifiCorp submitted its CAP, PacifiCorp informed Energy Safety that implementation of the new MDMS had failed due to unresolvable functionality issues and PacifiCorp was reverting back to its legacy MDMS.¹⁰ Energy Safety requested additional documentation from PacifiCorp in an email on April 1, 2026 to describe the issues and any corrective actions PacifiCorp was planning to address the MDMS issues.¹¹ In response, PacifiCorp provided supplemental documentation on April 22, 2026, stating that it is working with its vendor to remediate the new MDMS system to provide the full functionality described in its CAP; however, PacifiCorp did not provide details or a timeline regarding the necessary remediation of the new MDMS.¹² In the interim, PacifiCorp stated that it was exploring options to add some of the features described in the CAP to the legacy system. PacifiCorp did not provide details or a timeline regarding upgrades to the legacy MDMS in the April 22, 2026, response.

Table 1. Summary of PacifiCorp's outstanding deficiencies in performance year 2024.

Vegetation Management Initiative	Description of Deficiency
8.2.3.1.1 Wood and Slash Management	PacifiCorp did not provide documentation to substantiate the removal of wood and slash debris generated from vegetation management activities. PacifiCorp completed debris management at 247 locations compared to 8,017 locations that received vegetation work. As a corrective action, PacifiCorp plans to research how other utilities track debris management and plans to implement improvements to procedures based on this analysis in 2028. However, without specific actions to improve wood and slash management and an implementation

⁸ PacifiCorp, 2024 SVM Audit Corrective Action Plan Rev.0 (January 30, 2026), (Appendix 2).

⁹ PacifiCorp Response to Energy Safety's Request about the status of mobile data management system (MDMS) upgrades. (April 22, 2026) CA - MDMS - Energy Safety (1) 4-22-26.pdf.

¹⁰ Monthly meeting between Energy Safety's Environmental Science Division and PacifiCorp. March 30, 2026.

¹¹ "Follow-up to March 30 meeting on Mobile Data Management System (MDMS) roll-back" e-mail From Energy Safety to PacifiCorp. April 1, 2026.

¹² PacifiCorp, CA - MDMS - Energy Safety (1) 4-22-26 (002) (April 22, 2026), p.3

Vegetation Management Initiative	Description of Deficiency
	plan for these actions, the corrective action was not sufficient to achieve the objective of this initiative.
8.2.3.1.2 Pole Clearing (VM-05)	PacifiCorp did not meet its Fuels Management Pole Clearing target of 3,126 poles in LRA HFTD. PacifiCorp inspected 1,384 poles in LRA HFTD and cleared 1,018 poles in LRA HFTD. As a corrective action, PacifiCorp committed to revise its pole clearing tracking process and to develop an inventory to catalog exempt from non-exempt poles. Nevertheless, PacifiCorp did not clear 3,126 poles in LRA HFTD areas and its corrective action does not address this deficiency.
8.2.3.2 Clearance	PacifiCorp did not demonstrate that expanded clearances were either prescribed or achieved in accordance with the WMP. As a corrective action, PacifiCorp committed to using its legacy MDMS to track the presence of cyclebusters ¹³ but did not include a corrective action to track expanded clearance achieved on cyclebusters. Therefore, the corrective action was not sufficient to achieve the objective of this initiative.
8.2.3.5 High-Risk Species	PacifiCorp did not demonstrate that it performed additional pruning for at-risk species with fast growth rates as required by the WMP. Further, PacifiCorp did not demonstrate that it was tracking and documenting high-risk species to ensure enhanced clearance distances were maintained. As a corrective action, PacifiCorp committed to use the new MDMS system to improve tracking of cyclebusters and document expanded clearances. In the absence of the new MDMS, PacifiCorp committed to using its legacy MDMS to track the presence of cyclebusters. However, PacifiCorp did not include a corrective action to demonstrate the expanded clearance work was completed or that the expanded distances were maintained for

¹³ PacifiCorp defines “cyclebusters” as trees with fast growth rates that can be considered high-risk/at-risk species because they pose an elevated risk of electrical contact.

Vegetation Management Initiative	Description of Deficiency
	fast-growing species. Therefore, the corrective action was not sufficient to achieve the objective of this initiative.
8.2.5. Quality Assurance and Quality Control	PacifiCorp did not remediate all work exceptions. As a corrective action, PacifiCorp committed to using the new MDMS system to improve tracking of its QA/QC work orders. In the absence of the new MDMS, PacifiCorp committed to using its legacy MDMS to record audit findings and the completion of corrective maintenance to resolve those findings. However, the legacy system did not have adequate capability to track the work in 2024 and, unless sufficient upgrades are integrated into the legacy system, performance would not improve in future years. Therefore, the corrective action was not sufficient to achieve the objective of this initiative.
8.2.6 Open Work Orders	PacifiCorp did not complete 39% of work orders within six weeks of inspection, leaving an unknown level of ignition risk in its system. As a corrective action, PacifiCorp committed to developing a report in its new MDMS to track issuance, status, and completion against the assigned priority and timeframe. In the absence of the new MDMS, PacifiCorp plans to assess the feasibility of prioritizing work orders and tracking work orders against their due date. However, without specific actions to prioritize and track open work orders and an implementation plan for these actions, the corrective action was not sufficient to achieve the objective of this initiative.

2.1 WMP VM commitment assessment approach

The purpose of the VMA is to determine whether PacifiCorp performed all work related to commitments made in its WMP and identify any deficiencies in PacifiCorp vegetation management programs that have the potential to increase wildfire ignition risk.

The VMA includes the following steps:

1. **Completion of Work-** Determination of whether the electrical corporation submitted sufficient documentation to demonstrate that it performed all work for each of the vegetation management commitments described in the WMP.

If the electrical corporation provided sufficient documentation demonstrating that all work was completed for all commitments within an initiative, Energy Safety concluded that the initiative is complete, and the analysis ended here. If the electrical corporation did not provide sufficient documentation to conclude that all work was complete, then Energy Safety continued the analysis to include one or more of the following:

2. **Assessment of Constraints-** Energy Safety reviewed the documentation provided regarding constraints to determine acceptability and commitment to resolving constraints in a timely way.
3. **Corrective Actions-** Energy Safety reviewed the corrective actions proposed by the electrical corporation in its CAP as well as in the April 2026 document about its MDMS upgrades to determine if the proposed corrections will prevent deficiencies and ensure that WMP commitments will be completed in future performance years.
4. **Achievement of Objective-** Determination of whether the electrical corporation's incomplete work has detracted from its ability to achieve the objective of the initiative after considering constraints and planned corrective actions.

2.2 WMP VM commitment assessment approach

PacifiCorp's 2024 VMA findings identified nine initiatives for which it initially did not provide sufficient documentation to support that all work was completed. PacifiCorp was able to provide additional documentation and corrective actions in its CAP response to support completion of three initiatives that Energy Safety initially found to be deficient in the VMA. Six initiatives have outstanding deficiencies as documented in this VMA Report.

A summary of Energy Safety's VMA and VMA Report initiative findings are presented in Table 2. A finding of "Complete" for the VMA Report indicates that PacifiCorp provided additional documentation to support that all work was completed. A finding of "Deficient" indicates that PacifiCorp did not complete all work and did not sufficiently address the deficiencies. As discussed above, Energy Safety considered both PacifiCorp's CAP and the supplemental information provided by PacifiCorp in April 2026 to determine whether the corrective actions sufficiently addressed the deficiencies identified in the VMA. Energy Safety's analysis is described for each initiative below.

Table 2. Summary of Energy Safety's findings regarding completion of PacifiCorp's VM Initiatives in its 2023-2025 WMP for performance year 2024. Deficient initiatives are bold.

Vegetation Management Initiative	VMA Finding	VMA Report Finding
8.2.2. Vegetation Management Inspections	Deficient	Complete
8.2.3.1.1 Wood and Slash Management	Deficient	Deficient
8.2.3.1.2 Pole Clearing	Deficient	Deficient
8.2.3.2 Clearance	Deficient	Deficient
8.2.3.3 Fall-In Mitigation	Complete	Complete
8.2.3.4 Substation Defensible Space	Deficient	Complete
8.2.3.5 High-Risk Species	Deficient	Deficient
8.2.3.6 Fire Resilient Right-of-Ways	Complete	Complete
8.2.3.7 Emergency Response Vegetation Management	Complete	Complete
8.2.4. Vegetation Management Enterprise System	Complete	Complete
8.2.5. Quality Assurance and Quality Control	Deficient	Deficient
8.2.6 Open Work Orders	Deficient	Deficient
8.2.7 Workforce Planning	Deficient	Complete

VMA Finding 1—Vegetation Management Inspections

The purpose of this initiative is to describe the “[i]nspections of vegetation around and adjacent to electrical facilities and equipment that may be hazardous by growing, blowing, or falling into electrical facilities or equipment.”¹⁴

Summary of Initiative Work Commitments and Identified Deficiencies

PacifiCorp did not provide sufficient documentation to support the completion of its inspections of distribution and transmission lines as described in sections 8.2.2.1 Detailed Inspections and 8.2.2.2 Patrol Inspections of its WMP.

Distribution Inspections. PacificCorp did not complete its targets for detailed and patrol inspections along distribution lines in 2024. In its 2023-2025 WMP, PacifiCorp committed to completing detailed inspections along 874 *circuit miles* of its distribution line in 2024.¹⁵ During Energy Safety’s initial VMA, PacifiCorp provided documentation demonstrating that it completed detailed inspections along 875 distribution *line miles* in 2024.¹⁶ PacifiCorp also committed to completing patrol inspections along 865 *circuit miles* of its distribution lines in 2024¹⁷ but provided documentation demonstrating that patrol inspections were completed along 1,035 distribution *line miles* in 2024.¹⁸ PacifiCorp did not provide a mechanism to convert line miles to circuit miles and therefore did not demonstrate that it met the circuit miles targets for detailed and patrol inspections.

Transmission Inspections. In its 2023-2025 WMP, PacifiCorp committed to performing detailed inspections of main grid transmission (MHS) lines annually and local transmission (THS) lines once every three years at a minimum.¹⁹ PacifiCorp provided documentation demonstrating that inspections were planned along three MHS lines annually and 24 THS once every three years.²⁰ According to this schedule, three MHS and 14 THS lines were set to

¹⁴ Office of Energy Infrastructure Safety, [2023-2025 Base Wildfire Mitigation Plan Technical Guidelines](#), Published December 2022, p. A-24, URL:

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53286&shareable=true>).

¹⁵ PacifiCorp, [2023-2025 Final Wildfire Mitigation Plan Update R2](#), Published February 22, 2024, pp. 185-187, URL: (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56336&shareable=true>).

¹⁶ Office of Energy Infrastructure Safety, 2024 VMA of PacifiCorp (December 19, 2025), (Appendix 1).

¹⁷ PacifiCorp, [2023-2025 Final Wildfire Mitigation Plan Update R2](#), Published February 22, 2024, pp. 185-187, URL: (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56336&shareable=true>).

¹⁸ Office of Energy Infrastructure Safety, 2024 VMA of PacifiCorp (December 19, 2025), (Appendix 1).

¹⁹ PacifiCorp, [2023-2025 Final Wildfire Mitigation Plan Update R2](#), Published February 22, 2024, p. 195, URL: (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56336&shareable=true>).

²⁰ Office of Energy Infrastructure Safety, 2024 VMA of PacifiCorp (December 19, 2025), (Appendix 1).

be inspected in 2024; however, PacifiCorp only provided documentation demonstrating that detailed inspections were completed at one THS line in 2024.²¹

PacifiCorp's CAP Response

Distribution Inspections. In its CAP, PacifiCorp provided the definitions of circuit miles and line miles as related to its vegetation management initiatives in 2024.

- “Circuit miles – the total length in miles of separate circuits regardless of the number of conductors used per circuit.
- Line miles – The number of miles of transmission and/or distribution line differs from circuit miles because individual circuits, such as the two circuits of a double circuit line, are not counted separately in circuit miles but are counted as separate total miles of line.”²²

Additionally, PacifiCorp clarified that in the documentation provided to substantiate the completion of detailed and patrol inspections on distribution lines, the column headers “Line” denoted “Circuit”, and the field “Miles” denoted “Circuit Miles.”^{23, 24} PacifiCorp stated that the miles reported for the detailed and patrol inspections on distribution lines in 2024 were circuit miles, not line miles, and no unit conversion was required.

Further, PacifiCorp provided the updated definitions of circuit miles and line miles in its 2026-2028 WMP and stated that these definitions will apply beginning in performance year 2026.

- “Circuit miles – The total length in miles of separate circuits regardless of the number of conductors used per circuit (i.e., different phases).
- Line miles – The number of miles of transmission and/or distribution conductors, including the length of each phase and parallel conductor segments.”²⁵

Lastly, PacifiCorp stated that beginning in the 2026 reporting year, it will ensure that supporting documentation will be presented in the same units of measure as detailed in its 2026-2028 WMP.

Transmission Inspections. In its CAP, PacifiCorp stated that it provided documentation of the years for which detailed inspections were planned and recorded for the three MHS and 24 THS lines. PacifiCorp stated that this demonstrated that “the MHS lines were scheduled annually and the THS lines were scheduled at least once during the 2022-2024 period, consistent with the schedule.”²⁶

²¹ Office of Energy Infrastructure Safety, 2024 VMA of PacifiCorp (December 19, 2025), (Appendix 1).

²² PacifiCorp, 2024 SVM Audit Corrective Action Plan Rev.0 (January 30, 2026), (Appendix 2).

²³ Data Request OEIS-E-SVM_2025-PacifiCorp-002, Question 2; Response to OEIS-SVM Data Request 2.4.

²⁴ PacifiCorp, 2024 SVM Audit Corrective Action Plan Rev.0 (January 30, 2026), (Appendix 2).

²⁵ PacifiCorp, 2024 SVM Audit Corrective Action Plan Rev.0 (January 30, 2026), (Appendix 2).

²⁶ PacifiCorp, 2024 SVM Audit Corrective Action Plan Rev.0 (January 30, 2026), (Appendix 2).

Analysis of PacifiCorp’s Performance with the Vegetation Management 2023-2025 WMP Initiatives

PacifiCorp demonstrated that it completed all work associated with its vegetation management inspections. Therefore, Energy Safety concluded that PacifiCorp met its targets for this initiative.

Adhering to planned schedules and completing distribution and transmission line inspections ensures that PacifiCorp finds all vegetation hazards that pose ignition risk on its system. PacifiCorp demonstrated that it completed detailed inspections along 875 distribution circuit miles and patrol inspections along 1,035 distribution circuit miles, exceeding both commitment targets in 2024. Furthermore, to ensure accurate data in future performance years, PacifiCorp stated that it will provide supporting documentation using units that are consistent with the target set in its 2026-2028 WMP.

PacifiCorp also clarified it had provided its schedule for MHS and THS detailed inspection schedule in 2024, which included completing detailed inspections for three MHS and 24 THS lines. Energy Safety verified PacifiCorp’s detailed inspection schedule for transmission lines. Therefore, Energy Safety concluded that PacifiCorp adhered to its detailed inspection schedule for its transmission lines in performance year 2024.²⁷

Initiative Level Determination

PacifiCorp demonstrated that it achieved its inspection targets in 2024, adhered to its 2024 inspection schedule, and planned to improve its reporting in future performance. Therefore, Energy Safety found that PacifiCorp demonstrated completion of its 2024 vegetation management inspection commitments and has met the objective of Initiative 8.2.2 Vegetation Management Inspections.

²⁷ Data Request OEIS-E-SVM_2025-PacifiCorp-001 1st Supplemental response to OEIS-SVM Data Request 3; attachment: “OEIS SVM 3.xlsx.”

VMA Finding 2—8.2.3.1.1 Wood and Slash Management

The purpose of this initiative is “to manage all downed wood and “slash” generated from vegetation management activities.”²⁸

Summary of Initiative Work Commitments and Identified Deficiencies

PacifiCorp did not provide sufficient documentation to support that all work was completed for Initiative 8.2.3.1.1 Wood and Slash Management. In its 2023-2025 WMP, PacifiCorp committed to chipping or removing slash generated from vegetation management activities where accessible unless the property owner indicated otherwise.²⁹ During Energy Safety’s 2024 VMA, PacifiCorp prescribed corrective maintenance at 8,017 locations during its detailed and patrol inspections of distribution and transmission lines but only provided documentation demonstrating debris management prescriptions at 247 locations, none of which had a recorded completion date.³⁰

PacifiCorp’s CAP Response

In its CAP response, PacifiCorp stated that it handled wood and slash generated from vegetation management activities in accordance with its Vegetation Management Standard Operating Procedure (SOP).³¹ According to its SOP, wood and slash management activities vary depending on site conditions and agency/landowner requirements. Typically, debris was chipped and hauled away in developed areas, chipped and broadcasted in undeveloped areas, and lopped and scattered where access was limited. These activities occurred at the time of pruning or removal. As a corrective action, PacifiCorp stated it will “benchmark” wood and slash debris management and recordkeeping activities with other California electric utility companies, as described in VM-12 of PacifiCorp’s 2026-2028 Wildfire Mitigation Plan starting in the second quarter of 2026,³² and will use the information to further develop its procedures and recordkeeping practices in 2028.³³

²⁸ Office of Energy Infrastructure Safety, [2023-2025 Base Wildfire Mitigation Plan Technical Guidelines](#), Published December 2022, p. A-24, URL:

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53286&shareable=true>).

²⁹ PacifiCorp, [2023-2025 Final Wildfire Mitigation Plan Update R2](#), Published February 22, 2024, p. 200, URL:

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56336&shareable=true>).

³⁰ Office of Energy Infrastructure Safety, 2024 VMA of PacifiCorp (December 19, 2025), (Appendix 1).

³¹ PacifiCorp, 2024 SVM Audit Corrective Action Plan Rev.0 (January 30, 2026), (Appendix 2).

³² PacifiCorp, [2026-2028 Wildfire Mitigation Plan Version R1](#), Published November 26, 2025, p. 280, URL:

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=59778&shareable=true>).

³³ PacifiCorp, 2024 SVM Audit Corrective Action Plan Rev.0 (January 30, 2026), (Appendix 2).

Analysis of PacifiCorp's Performance with the Vegetation Management 2023-2025 WMP Initiatives

Energy Safety concluded that PacifiCorp did not manage wood and slash debris as described in its WMP. PacifiCorp does not require its contractors to record removal of wood and slash debris and stated that it did not plan to do so in the future. Without evidence that its contractors removed debris from work sites, PacifiCorp cannot demonstrate that the work was completed. Improper debris management could increase ground fuels and thereby increase wildfire risk. As a corrective action, PacifiCorp committed to completing a study to evaluate how other California utilities manage wood and slash and then to develop a plan to track wood and slash based on this study (referred to in the CAP as a benchmarking study). PacifiCorp stated that improvements identified in its benchmarking study, if applicable, will be implemented in September 2028.³⁴ Given the uncertainty of the benchmarking study results and the long implementation timeline, Energy Safety concluded that this corrective action did not adequately address the deficiency identified in the VMA and that PacifiCorp did not achieve the objective of this initiative to manage all downed wood and “slash” generated from vegetation management activities. To achieve the objective of this initiative, PacifiCorp must develop a detailed plan to track and document its wood and slash management activities in its service territory and implement proper management of the wood debris to minimize risk on the system.

Initiative Level Determination

The objective of this initiative is to manage all wood and slash debris generated from vegetation management activities. PacifiCorp did not provide specific corrective actions to address the deficiency. Therefore, Energy Safety concluded that PacifiCorp did not meet the objective of 8.2.3.1.1 Wood and Slash Management and it remains deficient.

³⁴ PacifiCorp, [2026-2028 Wildfire Mitigation Plan Version R1](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=59778&shareable=true), Published November 26, 2025, p. 280, URL: (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=59778&shareable=true).

VMA Finding 3—8.2.3.1.2 Pole Clearing

The purpose of this initiative is to describe the “[p]lan and execution of vegetation removal around poles per Public Resources Code section 4292 and outside the requirements of Public Resources Code section 4292 (e.g., pole clearing performed outside of the State Responsibility Area).”³⁵

Summary of Initiative Work Commitments and Identified Deficiencies

PacifiCorp did not provide sufficient documentation to establish that all work was completed for Initiative 8.2.3.1.2 Pole Clearing because it did not meet its Fuels Management target in its WMP. In its 2023-2025 WMP, PacifiCorp committed to clearing 3,126 poles in LRA HFTD Areas.³⁶ PacifiCorp provided documentation indicating that it considers the number of unique Map Object IDs to indicate the number of poles inspected as part of this initiative.³⁷ Although this document demonstrated that 3,257 poles³⁸ in LRA were inspected in performance year 2024, only 1,018 poles^{39, 40} received clearance work in LRA HFTD areas. Therefore, Energy Safety concluded that PacifiCorp did not complete all work associated with this target.

PacifiCorp’s CAP Response

PacifiCorp stated that it met the objective of the initiative. In its CAP response, PacifiCorp explained that its pole clearing targets were developed based on (1) poles physically cleared and (2) poles inspected that did not require clearing at the time of inspection (including poles meeting exemption criteria).⁴¹ In counting work for this target, PacifiCorp stated that it counted both poles that received work and poles that were inspected only and were not cleared.⁴² With this assumption, PacifiCorp stated that it inspected a total of 3,257 poles

³⁵ Office of Energy Infrastructure Safety, [2023-2025 Base Wildfire Mitigation Plan Technical Guidelines](#), Published December 2022, p. A-24, URL:

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53286&shareable=true>).

³⁶ PacifiCorp, [2023-2025 Final Wildfire Mitigation Plan Update R2](#), Published February 22, 2024, pp. 185-187, URL: (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56336&shareable=true>).

³⁷ PacifiCorp’s 1st Supplemental Responses to CA 2023-2025 WMP - OEIS SVM (1 3 and 8) 06-17-2025 (002), Question 1; 1st Supplemental Response to OEIS-SVM Data Request 1.

³⁸ CA 2023-2025-WMPs OEIS SVM Set 2 (1-22) 7-21-25, Question 2.1; Response to OEIS-SVM Data Request 2.1.

³⁹ CA 2023-2025-WMPs OEIS SVM Set 2 (1-22) 8-1-25, Question 2.5; attachment: “OEIS Set 2 Data Request-5-1.xls”

⁴⁰ Energy Safety re-analyzed the data submitted by PacifiCorp to exclude poles with FRA and SRA designation that Energy Safety previously included in PacifiCorp’s 2024 WMP Vegetation Management Audit.

⁴¹ PacifiCorp, 2024 SVM Audit Corrective Action Plan Rev.0 (January 30, 2026), (Appendix 2).

⁴² PacifiCorp, 2024 SVM Audit Corrective Action Plan Rev.0 (January 30, 2026), (Appendix 2).

(1,384 of these poles were in LRA HFTD areas).^{43, 44} Therefore, PacifiCorp asserted that its pole clearing program met the requirements of Public Resources Code section 4292, California Code of Regulations sections 1250–1257, as applicable, and the California Power Line Fire Prevention Field Guide (Field Guide).⁴⁵ Additionally, PacifiCorp referred to documentation demonstrating that it physically cleared a total of 2,947 poles.^{46, 47, 48} Energy Safety noted that while PacifiCorp demonstrated all 2,947 cleared poles were in LRA territory, it did not provide the HFTD designation.

PacifiCorp referred to its 2023 SVM Audit Corrective Action Plan in which it committed to revising its pole clearing tracking process to accurately capture poles that are inspected but not worked or have exempt equipment.⁴⁹ PacifiCorp said that this change allows for increased accuracy of pole counts.⁵⁰

PacifiCorp recognized opportunities for improvement and committed to continuously revise its pole clearing tracking process. PacifiCorp plans to implement a revised pole clearing inventory and tracking framework to ensure complete and accurate records of poles requiring inspection and/or clearance in LRA HFTD areas. PacifiCorp committed to establishing a new baseline through a comprehensive pole inventory that classifies poles as exempt or non-exempt.⁵¹

Analysis of PacifiCorp’s Performance with the Vegetation Management 2023-2025 WMP Initiatives

Energy Safety concluded that PacifiCorp’s CAP response did not sufficiently address the deficiency identified in the VMA. In its 2023-2025 WMP, the fuels management target was to clear 3,126 poles in LRA HFTD areas. Therefore, Energy Safety only considered the poles cleared in LRA HFTD towards the target pursuant to the WMP. PacifiCorp inspected 1,384 poles in LRA HFTD and cleared 1,018 poles in LRA HFTD areas.^{52, 53} Therefore, PacifiCorp did not meet its target to clear 3,126 poles in LRA HFTD in performance year 2024.

⁴³ PacifiCorp's 1st Supplemental Responses to CA 2023-2025 WMP - OEIS SVM (1 3 and 8) 06-17-2025 (002), Question 1; 1st attachment: “OEIS-SVM 1-1 1st SUPP.”

⁴⁴ CA 2023-2025-WMPs OEIS SVM Set 2 (1-22) 7-21-25, Question 2.1; Response to OEIS-SVM Data Request 2.1.

⁴⁵ PacifiCorp, 2024 SVM Audit Corrective Action Plan Rev.0 (January 30, 2026), (Appendix 2).

⁴⁶ CA 2023-2025-WMPs OEIS SVM Set 2 (1-22) 7-21-25, Question 2.1; Response to OEIS-SVM Data Request 2.1.

⁴⁷ Data Request OEIS-E-SVM_2025-PC-002, Question 2.1; attachment: “OEIS SVM 2.1.xlsx.”

⁴⁸ PacifiCorp, 2024 SVM Audit Corrective Action Plan Rev.0 (January 30, 2026), (Appendix 2).

⁴⁹ PacifiCorp, 2023 Substantial Vegetation Management (SVM) Audit Corrective Action Plan R0, Published March 21, 2025, pp. 6.

⁵⁰ PacifiCorp, 2024 SVM Audit Corrective Action Plan Rev.0 (January 30, 2026), (Appendix 2).

⁵¹ PacifiCorp, 2024 SVM Audit Corrective Action Plan Rev.0 (January 30, 2026), (Appendix 2).

⁵² CA 2023-2025-WMPs OEIS SVM Set 2 (1-22) 8-1-25, Question 2.5; attachment: “OEIS Set 2 Data Request-5-1.xlsx”

⁵³ CA 2023-2025-WMPs OEIS SVM Set 2 (1-228-1-25, Question 2.5; Response to OEIS-SVM Data Request 2.5.

As a corrective action, PacifiCorp' committed to improve its pole clearing tracking process, distinguish between poles not worked and poles that were cleared, and develop a comprehensive pole inventory that classifies poles as exempt or non-exempt. Although these corrective actions could mature PacifiCorp's record keeping and reporting capabilities, it did not demonstrate a commitment to brush poles within the WMP target population. Energy Safety will continue to track PacifiCorp's progress toward implementing an appropriate pole clearing program in future years.

Initiative Level Determination

The objective of this initiative is to implement a pole clearing program to minimize ignition risk on PacifiCorp's system. PacifiCorp did not meet its fuels management target and did not provide sufficient corrective actions to ensure the target would be met in future performance years. Therefore, Energy Safety concluded that PacifiCorp did not meet the objective of 8.2.3.1.2 Pole Clearing and it remains deficient.

VMA Finding 4—8.2.3.2 Clearance

The purpose of this initiative is to take actions “after inspection to ensure that vegetation does not encroach upon electrical equipment and facilities, such as tree trimming.”⁵⁴

Summary of Initiative Work Commitments and Identified Deficiencies

PacifiCorp did not provide sufficient documentation to support that all work commitments pertaining to Initiative 8.2.3.2 Clearance were completed in 2024. PacifiCorp did not provide sufficient documentation to support the completion of all work associated with 8.2.3.2 Pruning Beyond Minimum Required Clearances, including expanded clearance distances based on tree growth rates and tree physical structure.

In its 2023-2025 WMP PacifiCorp committed to prune vegetation beyond minimum required clearances on distribution lines depending on tree growth rate⁵⁵ and physical structure of the inspected tree.⁵⁶ PacifiCorp stated that it did not record metrics related to growth rate, and

⁵⁴ Office of Energy Infrastructure Safety, [2023-2025 Base Wildfire Mitigation Plan Technical Guidelines](#), Published December 2022, p. A-24, URL:

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53286&shareable=true>).

⁵⁵ PacifiCorp, [2023-2025 Final Wildfire Mitigation Plan Update R2](#), Published February 22, 2024, p. 202, URL: (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56336&shareable=true>).

⁵⁶ PacifiCorp, [2023-2025 Final Wildfire Mitigation Plan Update R2](#), Published February 22, 2024, p. 202, URL: (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56336&shareable=true>).

did not record the clearance distance achieved at time of pruning or use of natural target pruning techniques.⁵⁷ Therefore, PacifiCorp could not demonstrate that increased clearance was applied for moderate and fast-growing species at time of pruning or that natural target pruning was completed as a method to prune vegetation beyond minimum required clearances.

PacifiCorp's CAP Response

In its CAP response, PacifiCorp stated that it treats signed contractor work releases as attestations that vegetation work was performed in accordance with PacifiCorp's specifications and SOP requirements which included the use of expanded clearance distances for species as needed.⁵⁸ PacifiCorp stated that measuring and recording post-work clearance distances for each individual tree is not reasonable or practicable. Therefore, PacifiCorp stated that it will continue to rely on its SOP-based distances, contractor attestations, and its post-audit program to verify that clearance distances were applied consistently with species' growth rate and physical structure.⁵⁹

To demonstrate what it received from its contractors, PacifiCorp provided examples of signed 2024 work releases for work performed on distribution lines following a patrol inspection. The work releases contained district name, contractor responsible for completing work, work code, project number, supervisor, feeder/grid #, and scheduled miles.⁶⁰ PacifiCorp also provided a description of the contractor's general responsibilities along with its Annual Patrol Threshold and Minimum Clearance Post-Work guidelines. PacifiCorp used these guidelines to decide the clearance target based on tree growth rate for slow, moderate, and fast-growing trees.⁶¹

Analysis of PacifiCorp's Performance with the Vegetation Management 2023-2025 WMP Initiatives

Energy Safety concluded that PacifiCorp did not demonstrate that it achieved expanded clearance distances based on tree growth rate and physical structure. In the 2023-2025 WMP, PacifiCorp committed to maintaining the required minimum clearance distances in Table 1 of GO95. This maintenance requires expanded clearance for fast growing species so that these species do not encroach on facilities before the next scheduled inspection. Because PacifiCorp does not track whether its contractors prune beyond minimum required

⁵⁷ Data Request OEIS-E-SVM_2025-PacifiCorp-001, Question 22; Response to OEIS-SVM Data Request 22.

⁵⁸ PacifiCorp, 2024 SVM Audit Corrective Action Plan Rev.0 (January 30, 2026), (Appendix 2).

⁵⁹ PacifiCorp, 2024 SVM Audit Corrective Action Plan Rev.0 (January 30, 2026), (Appendix 2).

⁶⁰ PacifiCorp, 2024 SVM Audit Corrective Action Plan Rev.0 (January 30, 2026), (Appendix 2).

⁶¹ PacifiCorp, 2024 SVM Audit Corrective Action Plan Rev.0 (January 30, 2026), (Appendix 2).

clearance, PacifiCorp could not demonstrate that expanded clearance work was completed when necessary.⁶²

In the CAP, PacifiCorp committed to include high-risk species “cyclebuster”⁶³ identification within its new MDMS (GeoDigital) to improve its tracking of expanded clearances for high-risk species as discussed in Section 8.2.3.5 below.⁶⁴ However, as documented in the April 22, 2026 supplemental information provided to Energy Safety, the new MDMS implementation has failed.^{65,66} Instead, PacifiCorp plans to use the ‘cyclebuster Y/N’ data field in the legacy MDMS to record whether a cyclebuster is present at a work location.⁶⁷ Energy Safety concluded that while this action would log cyclebuster trees, the corrective action does not include a field to track whether the cyclebuster received the required expanded clearance needed to achieve the objective of this initiative. Therefore, PacifiCorp does not have a sufficient corrective action plan to implement the clearance requirements to reduce wildfire risk on its system.

Initiative Level Determination

The objective of this initiative is to ensure that vegetation does not encroach upon electrical equipment and facilities. PacifiCorp did not demonstrate that increased clearance was completed and maintained and did not have a corrective action to address the deficiency. Therefore, Energy Safety concludes that PacifiCorp did not meet the objective of 8.2.3.2 Clearance and it remains deficient.

⁶² PacifiCorp, [2023-2025 Final Wildfire Mitigation Plan Update R2](https://efiling.energy.ca.gov/eFiling/Getfile.aspx?fileid=56336&shareable=true), Published February 22, 2024, p. 202, URL: (https://efiling.energy.ca.gov/eFiling/Getfile.aspx?fileid=56336&shareable=true).

⁶³ PacifiCorp defines “cyclebusters” as trees with fast growth rates that can be considered high-risk/at-risk species because they pose an elevated risk of electrical contact.

⁶⁴ PacifiCorp, 2024 SVM Audit Corrective Action Plan Rev.0 (January 30, 2026), (Appendix 2).

⁶⁵ PacifiCorp, 2026 Monthly Meeting with Energy Safety (March 30, 2026).

⁶⁶ Energy Safety issued a series of notices of violation (NOV) in 2024 regarding post-work- clearance distances achieved by contractors. On October 31st of 2024 Energy Safety issued an NOV of initiative 8.2.3.2 Clearance to PacifiCorp about a Black cottonwood (*P. trichocarpa*) tree which was two feet directly under the covered conductor. The NOV states, “Given the time between reported work and inspections (approximately four months), Energy Safety has determined that it is unlikely that the tree was trimmed to the initiative protocol requirements of 12 feet at the time of work. Additionally, given the fast growth rate of this species under the conductor, the tree may contact the conductor before the next patrol inspection for distribution lines.” Similar NOVs were issued on January 8, 2025, and February 25, 2025, for failure to maintain clearance distances for work conducted in 2024.

⁶⁷ PacifiCorp, CA - MDMS - Energy Safety (1) 4-22-26 (002) (April 22, 2026), p.3.

VMA Finding 5—8.2.3.4 Substation Defensible Space

The purpose of this initiative is to take actions “to reduce ignition probability and wildfire consequence due to contact with substation equipment.”⁶⁸

Summary of Initiative Work Commitments and Identified Deficiencies

PacifiCorp did not provide sufficient documentation to support that all work was completed for Initiative 8.2.3.4 Substation Defensible Space. In its 2023-2025 WMP PacifiCorp committed to conduct vegetation management inspections and prescribed work at substations.⁶⁹

PacifiCorp did not provide documentation demonstrating that lines connecting to a substation were inspected and that vegetation hazard identifications took place within substation defensible spaces.^{70,71}

PacifiCorp’s CAP Response

In its CAP response, PacifiCorp clarified that its vegetation program included inspection and maintenance of vegetation conditions in and around substations, including removal of overhanging or climbable vegetation and weed abatement, and identification/mitigation of nearby hazard trees as part of detailed and patrol inspections.⁷²

PacifiCorp provided its 2024 weed-abatement tracker which tracks the total number of acres at a substation that were sprayed with pesticides.⁷³ The tracker provided the substation name, location, number of acres sprayed, and date treated. Based on this information, 7.5 acres were sprayed at Crescent City, CA, 22.35 acres at Yreka, CA, and 7.7 acres at Klamath Falls, CA.

PacifiCorp also provided a sample daily weed-abatement report which provided evidence of weed abatement being completed at Yreka District.⁷⁴ The first page of the report contains the project name and number, report number, location, date completed, number of personnel and major equipment present at the site, contractor, and a description of tasks completed (ex: sprayed substations). The second page of the report contained photos of the tasks as

⁶⁸ Office of Energy Infrastructure Safety, [2023-2025 Base Wildfire Mitigation Plan Technical Guidelines](#), Published December 2022, p. A-24, URL:

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53286&shareable=true>).

⁶⁹ PacifiCorp, [2023-2025 Final Wildfire Mitigation Plan Update R2](#), Published February 22, 2024, p. 204, URL: (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56336&shareable=true>).

⁷⁰ Data Request OEIS-E-SVM_2025-PacifiCorp-002, Question 2.8; Response to OEIS-SVM Data Request 2.8.

⁷¹ Office of Energy Infrastructure Safety, 2024 VMA, (December 19, 2025), (Appendix 1).

⁷² PacifiCorp, 2024 SVM Audit Corrective Action Plan Rev.0 (January 30, 2026), (Appendix 2).

⁷³ 024 PP Weed Abatement Facility List (End of year 2024).xlsx.

⁷⁴ “DCREP PacifiCorp weed abatement 20240416 Yreka.pdf.”

they were completed by the contractor at the substation. PacifiCorp explained that these photos demonstrate that substation-adjacent vegetation inspections (including lines connecting to substations) were performed as part of the 2024 detailed/patrol inspections.

Additionally, beginning in 2026, PacifiCorp committed to using its Mobile Data Management System (MDMS) to track substation perimeter inspections, allowing for the inspector to record substation perimeter inspections.⁷⁵ However, as documented in the April 22, 2026 supplemental information provided to Energy Safety, PacifiCorp alerted Energy Safety that the new MDMS implementation has failed.⁷⁶ Instead, "PacifiCorp will coordinate with the legacy MDMS vendor to identify feasibility of tracking substation perimeter inspections or PacifiCorp may track substation perimeter inspections separate from the legacy MDMS as part of the substation defensible space initiative."⁷⁷ Energy Safety concluded that the planned corrective actions could further enhance tracking and thus reporting of substation defensible space inspections.

Analysis of PacifiCorp's Performance with the Vegetation Management 2023-2025 WMP Initiatives

Energy Safety concluded that PacifiCorp achieved the objective of this initiative. In its CAP, PacifiCorp demonstrated that substation perimeter vegetation inspections and maintenance were performed as a part of its 2024 detailed and patrol inspection programs.

Initiative Level Determination

The objective of this initiative was to reduce ignition probability due to vegetation contact with substation equipment. PacifiCorp demonstrated that it conducted vegetation inspections and mitigation at substations and committed to improving its substation activity tracking system. Therefore, Energy Safety found that PacifiCorp demonstrated completion of its 2024 substation inspection commitment and has met the objective of Initiative 8.2.3.4 Substation Defensible Space.

⁷⁵ PacifiCorp, 2024 SVM Audit Corrective Action Plan Rev.0 (January 30, 2026), (Appendix 2).

⁷⁶ Energy Safety concluded that upgrades to PacifiCorp's MDMS system would address the deficiency in tracking substation defensible space inspections. The new system was deployed in October of 2025. However, during the monthly meeting between PacifiCorp and Energy Safety's Environmental Science Division on March 30, 2026, PacifiCorp alerted Energy Safety that the new MDMS system had significant flaws in functionality and the implementation was rolled back while PacifiCorp conducted necessary troubleshooting to identify the problem. Energy Safety requested regular updates on this process and a revised schedule for implementing the new MDMS system.

⁷⁷ PacifiCorp, CA - MDMS - Energy Safety (1) 4-22-26 (002) (April 22, 2026), p.3.

VMA Finding 6—8.2.3.5 High-Risk Species

The purpose of this initiative is to take actions “to reduce the ignition probability and wildfire consequence attributable to high-risk species of vegetation.”⁷⁸

Summary of Initiative Work Commitments and Identified Deficiencies

PacifiCorp did not provide sufficient documentation to support that all work was completed for Initiative 8.2.3.5 High-Risk Species.⁷⁹ In its 2023-2025 WMP, PacifiCorp committed to performing additional pruning for at-risk species with fast growth rates.⁸⁰ PacifiCorp explained that pruning or removal of at-risk species was not discretely tracked and was embedded within other work activities.⁸¹ Therefore, PacifiCorp did not provide information to demonstrate that it inspects and remediates high risk species.⁸²

PacifiCorp’s CAP Response

In its CAP response, PacifiCorp stated that it maintains high-risk trees (e.g., fast-growing trees) as part of its vegetation management program and tracks vegetation management activities, such as pruning and removals, by species.⁸³ PacifiCorp provided a revised version of a previously submitted attachment in which PacifiCorp highlighted the fast growing trees removed or pruned.⁸⁴

As a corrective action, PacifiCorp committed to include high-risk species “cyclebuster” identification within its new MDMS (GeoDigital)⁸⁵ to ensure prompt completion of prunes and removals.

⁷⁸ Office of Energy Infrastructure Safety, [2023-2025 Base Wildfire Mitigation Plan Technical Guidelines](#), Published December 2022, p. A-24, URL:

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53286&shareable=true>).

⁷⁹ Office of Energy Infrastructure Safety, 2024 VMA, (December 19, 2025), (Appendix 1).

⁸⁰ PacifiCorp, [2023-2025 Final Wildfire Mitigation Plan Update R2](#), Published February 22, 2024, p. 205, URL: (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56336&shareable=true>).

⁸¹ Data Request OEIS-E-SVM_2025-PacifiCorp-001, Question 26; Response to OEIS-SVM Data Request 26.

⁸² Office of Energy Infrastructure Safety, 2024 VMA, (December 19, 2025), (Appendix 1).

⁸³ PacifiCorp, 2024 SVM Audit Corrective Action Plan Rev.0 (January 30, 2026), (Appendix 2).

⁸⁴ PacifiCorp, 2024 VMA CAP (January 30, 2026), attachment: “OEIS SVM 26 CONF_REVISSED_01142026.xlsx.”

⁸⁵ PacifiCorp, 2024 SVM Audit Corrective Action Plan Rev.0 (January 30, 2026), (Appendix 2).

Analysis of PacifiCorp's Performance with the Vegetation Management 2023-2025 WMP Initiatives

Energy Safety concluded that PacifiCorp did not adequately track cyclebusters this performance year and did not have sufficient corrective actions to address the deficiency. This initiative requires PacifiCorp to demonstrate that high-risk species received appropriate vegetation management to ensure they did not encroach on electrical infrastructure. As described in its CAP, PacifiCorp's proposed corrective action to incorporate high-risk species identification into its new MDMS would address the deficiency identified in the VMA to remediate wild-fire risk due to high-risk species.⁸⁶ However, as documented in the April 22, 2026 supplemental information provided to Energy Safety, PacifiCorp alerted Energy Safety that the new MDMS implementation has failed.⁸⁷ Instead, PacifiCorp plans to use the 'cyclebuster Y/N' data field in the legacy MDMS to record whether a cyclebuster is present at a work location.⁸⁸ As noted above in Section 8.2.3.2 Clearance, Energy Safety concluded that while PacifiCorp's corrective action allows it to log cyclebuster trees, it does not include a field to track additional pruning completed on cyclebusters. Therefore, PacifiCorp does not have a sufficient corrective action plan to track and maintain adequate clearance distances for High-Risk Species.

Initiative Level Determination

The purpose of this initiative is to reduce the ignition probability and wildfire consequences attributable to high-risk species of vegetation through maintaining clearance distances for high-risk species. PacifiCorp's plan to update the legacy MDMS should improve high-risk species identification, documentation alone is not sufficient to demonstrate that PacifiCorp is reducing the ignition probability and wildfire consequence. Therefore, Energy Safety concluded that PacifiCorp did not meet the objective of Initiative 8.2.3.5 High-Risk Species and it remains deficient.

⁸⁶ PacifiCorp, 2024 SVM Audit Corrective Action Plan Rev.0 (January 30, 2026), (Appendix 2).

⁸⁷ Energy Safety concluded that upgrades to PacifiCorp's MDMS system would address the deficiency in tracking cyclebusters to ensure necessary prunes and removals of high-risk species are conducted. The new system was deployed in October of 2025. However, during the monthly meeting between PacifiCorp and Energy Safety's Environmental Science Division on March 30, 2026, PacifiCorp alerted Energy Safety that the new MDMS system had significant flaws in functionality and the implementation was rolled back while PacifiCorp conducted necessary troubleshooting to identify the problem. Energy Safety requested regular updates on this process and a revised schedule for implementing the new MDMS system.

⁸⁸ PacifiCorp, CA - MDMS - Energy Safety (1) 4-22-26 (002) (April 22, 2026), p.3.

VMA Finding 7—8.2.5 Quality Assurance and Quality Control

The purpose of this initiative is the “[e]stablishment and function of audit process to manage and confirm work completed by employees or contractors, including packaging QA/QC information for input to decision-making and related integrated workforce management processes.”⁸⁹

Summary of Initiative Work Commitments and Identified Deficiencies

PacifiCorp did not provide sufficient documentation to support that all work was completed for Initiative 8.2.5 Quality Assurance and Quality Control.⁹⁰ PacifiCorp did not provide sufficient documentation to support the completion of its commitments related to 8.2.5 Corrective Actions (VM-11).⁹¹ In its 2023-2025 WMP, PacifiCorp committed to identifying and assigning work exceptions to its contractors who are responsible for any corrective action.⁹² While PacifiCorp provided its Audit Exceptions Report, which identified incomplete and inaccurate work, the documentation showed that only 813 of the 982 identified work exceptions identified were remediated. Therefore, Energy Safety found that work associated with this initiative was incomplete.

PacifiCorp’s CAP Response

In its CAP response, PacifiCorp did not dispute this finding and stated that it is implementing upgrades to its MDMS, GeoDigital, to improve the accuracy and traceability of post-audit activities and any associated re-work under VM-11. PacifiCorp explained that the post-audit workflow within GeoDigital will be redesigned to improve end-to-end tracking of identified exceptions through corrective action and closure verification. Additionally, PacifiCorp is developing standardized post-audit reporting capabilities in GeoDigital to aim to provide clear status visibility and management oversight of post-audit exceptions and related re-work.⁹³

⁸⁹ Office of Energy Infrastructure Safety, [2023-2025 Base Wildfire Mitigation Plan Technical Guidelines](#), Published December 2022, p. A-24, URL:

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53286&shareable=true>).

⁹⁰ Office of Energy Infrastructure Safety, 2024 VMA, (December 19, 2025), ([Appendix 1](#)).

⁹¹ Office of Energy Infrastructure Safety, 2024 VMA, (December 19, 2025), ([Appendix 1](#)).

⁹² PacifiCorp, [2023-2025 Final Wildfire Mitigation Plan Update R2](#), Published February 22, 2024, p. 208, URL: (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56336&shareable=true>).

⁹³ PacifiCorp, 2024 SVM Audit Corrective Action Plan Rev.0 (January 30, 2026), ([Appendix 2](#)).

Analysis of PacifiCorp's Performance with the Vegetation Management 2023-2025 WMP Initiatives

Energy Safety concluded that PacifiCorp did not complete all work exceptions identified by its QA/QC program and did not have sufficient corrective actions to address the deficiency. Vegetation Management QA/QC allows electrical corporations to identify and remediate inaccurate or incomplete vegetation management work to ensure risk is not left on the system. In its CAP, PacifiCorp commits to implementing improved end-to-end tracking of its QA/ QC program beginning with work exceptions, through completed corrective actions, and ending with closure verification as part of the MDMS upgrades.⁹⁴ However, as documented in the April 22, 2026 supplemental information provided to Energy Safety, PacifiCorp alerted Energy Safety that the new MDMS implementation has failed.⁹⁵ In the April 22, 2026 documentation, PacifiCorp stated that it will use the legacy MDMS capabilities to record audit findings and completion of those findings where applicable. PacifiCorp also stated that audit findings will be provided to its contractor who will then record audit re-work in the legacy MDMS and will specify that the work is in response to an audit finding.⁹⁶ However, without a detailed timeline or process in place to implement this revised plan, PacifiCorp has not provided sufficient corrective actions to achieve the objectives of this initiative.

Initiative Level Determination

The purpose of this initiative was to develop an audit system for vegetation management work and a process to utilize the QA/QC information in decision making. PacifiCorp did not complete all of its QA/QC in performance year 2024 and did not have sufficient planned corrective actions to improve performance in future years. Therefore, Energy Safety concluded that PacifiCorp did not meet the objective of 8.2.5 Quality Assurance and Quality Control and it remains deficient.

⁹⁴ PacifiCorp, 2024 SVM Audit Corrective Action Plan Rev.0 (January 30, 2026), (Appendix 2).

⁹⁵ Energy Safety concluded that upgrades to PacifiCorp's MDMS system would address the deficiency in tracking QA/QC exceptions to ensure timely completion of re-work. The new system was deployed in October of 2025. However, during the monthly meeting between PacifiCorp and Energy Safety's Environmental Science Division on March 30, 2026, PacifiCorp alerted Energy Safety that the new MDMS system had significant flaws in functionality and the implementation was rolled back while PacifiCorp conducted necessary troubleshooting to identify the problem. Energy Safety requested regular updates on this process and a revised schedule for implementing the new MDMS system.

⁹⁶ PacifiCorp, CA - MDMS - Energy Safety (1) 4-22-26 (002) (April 22, 2026), p.3.

VMA Finding 8—8.2.6 Open Work Orders

The purpose of this initiative is to take actions “to manage the electrical corporation’s open work orders resulting from inspections that prescribe vegetation management activities.”⁹⁷

Summary of Initiative Work Commitments and Identified Deficiencies

PacifiCorp did not provide sufficient documentation to support that all work was completed for Initiative 8.2.6 Open Work Orders. PacifiCorp did not provide documentation to support that it completed vegetation work orders within committed timeframes and that it tracked the locations and priority of work orders.⁹⁸

In its 2023-2025 WMP, PacifiCorp committed to completing vegetation management corrective maintenance between one and six weeks after inspections.⁹⁹ PacifiCorp provided documentation indicating that only 61% (4,886 out of 8,017) of all reported prescriptions along distribution and transmission lines were completed within 6 weeks of the inspection.^{100,101} The remaining 39% (3,131 out of 8,017) were completed more than 6 weeks after inspection. PacifiCorp did not provide documentation recording the reason the work was delayed or otherwise constrained.

PacifiCorp also described upgrades to its Form Link System which would improve tracking of open work orders. Because 39% of its work orders exceeded the timeframes committed to in the WMP, PacifiCorp did not demonstrate the Form Link upgrades were effective in driving completion of open work orders within the mitigation timeframe set in the WMP.

PacifiCorp’s CAP Response

In its CAP response, PacifiCorp restated its 2023-2025 WMP commitment: “Inspection on a circuit is *generally* initiated 1-6 weeks prior to the vegetation management corrective maintenance taking place.”¹⁰² PacifiCorp clarified that it “[...] phrased this statement in this manner to acknowledge the variability in duration between inspection and vegetation maintenance actions.”¹⁰³ PacifiCorp stated that inspections generally take place 1-6 weeks

⁹⁷ Office of Energy Infrastructure Safety, [2023-2025 Base Wildfire Mitigation Plan Technical Guidelines](#), Published December 2022, p. A-24, URL:

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53286&shareable=true>).

⁹⁸ Office of Energy Infrastructure Safety, 2024 VMA, (December 19, 2025), (Appendix 1).

⁹⁹ PacifiCorp, [2023-2025 Final Wildfire Mitigation Plan Update R2](#), Published February 22, 2024, p. 191, URL: (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56336&shareable=true>).

¹⁰⁰ Data Request OEIS-E-SVM_2025-PC-002, Question 2.19; attachment: “OEIS SVM Set 2 Data Request 19-1.xlsx.”

¹⁰¹ Data Request OEIS-E-SVM_2025-PC-002, Question 2.19; attachment: “OEIS SVM Set 2 Data Request 20-1.xlsx.”

¹⁰² PacifiCorp, 2024 SVM Audit Corrective Action Plan Rev.0 (January 30, 2026), (Appendix 2).

¹⁰³ PacifiCorp, 2024 SVM Audit Corrective Action Plan Rev.0 (January 30, 2026), (Appendix 2).

prior to maintenance, which PacifiCorp stated that it intended the phrase to be interpreted as an average timeframe of 1-6 weeks prior to maintenance.¹⁰⁴ PacifiCorp agreed with Energy Safety's analysis that it completed 61% of the work within six weeks of inspection¹⁰⁵

In its CAP, PacifiCorp also stated that the correct attachments may not have been included in response to its Form Link System update.¹⁰⁶ PacifiCorp provided the original Form Unit Link Report¹⁰⁷ and an updated Form Link Report,¹⁰⁸ each populated with data for circuit 8G103. Both reports paired each inspection to its follow-up completed corrective maintenance. The updated Form Link Report also calculated the days between time of inspection and work completion.

As a corrective action, PacifiCorp committed to developing a report in its new MDMS GeoDigital to track issuance, status, and completion against the assigned priority and timeframe.

Analysis of PacifiCorp's Performance with the Vegetation Management 2023-2025 WMP Initiatives

Energy Safety concluded that PacifiCorp did not manage its open work orders as described in its WMP. PacifiCorp committed to mitigating work prescribed during inspections generally within six weeks of the inspection date. Based on the documents PacifiCorp provided, 39% (3,131) of its work orders were completed more than six weeks after inspections. Of these overdue work orders, 339 work orders (11%) were completed 12-17 weeks (twice the target timeline), 95 work orders (3%) were completed 18-23 weeks after inspection (3 times the target timeline), and 64 work orders (2%) were completed 24 weeks after inspection (4 times the target timeline).^{109, 110} Failure to complete over one-third of the work within six weeks does not provide the level of assurance consistent with PacifiCorp's commitment to "generally" complete within 6 weeks. Timely mitigation of vegetation hazards decreases the amount of risk on the system. PacifiCorp's corrective action to improve its MDMS to prioritize and track completion of work orders is a step towards addressing the deficiency.¹¹¹ However, as documented in the April 22, 2026 supplemental information provided to Energy

¹⁰⁴ PacifiCorp, 2024 SVM Audit Corrective Action Plan Rev.0 (January 30, 2026), (Appendix 2).

¹⁰⁵ PacifiCorp, 2024 SVM Audit Corrective Action Plan Rev.0 (January 30, 2026), (Appendix 2).

¹⁰⁶ PacifiCorp, 2024 SVM Audit Corrective Action Plan Rev.0 (January 30, 2026), (Appendix 2).

¹⁰⁷ PacifiCorp, 2024 SVM Audit Corrective Action Plan Rev.0 (January 30, 2026), (Appendix 2), attachment: "FORM UNIT LINK REPORT.xlsx"

¹⁰⁸ PacifiCorp, 2024 SVM Audit Corrective Action Plan Rev.0 (January 30, 2026), (Appendix 2), attachment: "FORM LINK REPORT.xlsx"

¹⁰⁹ Data Request OEIS-E-SVM_2025-PC-002, Question 2.19; attachment: "OEIS SVM Set 2 Data Request 19-1.xlsx."

¹¹⁰ Data Request OEIS-E-SVM_2025-PC-002, Question 2.19; attachment: "OEIS SVM Set 2 Data Request 20-1.xlsx."

¹¹¹ PacifiCorp, 2024 SVM Audit Corrective Action Plan Rev.0 (January 30, 2026), (Appendix 2).

Safety, PacifiCorp alerted Energy Safety that implementation of the new MDMS has failed.¹¹² Instead, PacifiCorp stated that it will coordinate with its legacy MDMS vendor to identify feasibility of tracking against work prioritization and due dates associated with work priorities.¹¹³ However, without specific actions and a timeline for implementation, PacifiCorp has not provided sufficient corrective actions to demonstrate that it achieved the objective of this initiative.

Initiative Level Determination

The objective of this initiative was to manage open work orders resulting from inspections that prescribe vegetation management activities. PacifiCorp did not demonstrate that it managed its open work orders to minimize risk in its system and did not provide sufficient corrective actions to address the issues identified. Therefore, Energy Safety concluded that PacifiCorp did not meet the objective of 8.2.6 Open Work Orders and it remains deficient.

VMA Finding 9—8.2.7 Workforce Planning

The purpose of this initiative is to develop programs to “ensure that the electrical corporation has qualified vegetation management personnel and to ensure that both employees and contractors tasked with vegetation management responsibilities are adequately trained to perform relevant work.”¹¹⁴

Summary of Initiative Work Commitments and Identified Deficiencies

PacifiCorp did not provide sufficient documentation to support that all work was completed for Initiative 8.2.7 Workforce Planning.¹¹⁵ In its 2023-2025 WMP, PacifiCorp committed to have its utility foresters be certified arborists and have its utility specialists be certified by the

¹¹² Energy Safety concluded that upgrades to PacifiCorp’s MDMS system would address the deficiency in tracking open work orders to ensure timely completion of vegetation management work. The new system was deployed in October of 2025. However, during the monthly meeting between PacifiCorp and Energy Safety’s Environmental Science Division on March 30, 2026, PacifiCorp alerted Energy Safety that the new MDMS system had significant flaws in functionality and the implementation was rolled back while PacifiCorp conducted necessary troubleshooting to identify the problem. Energy Safety requested regular updates on this process and a revised schedule for implementing the new MDMS system.

¹¹³ PacifiCorp, CA - MDMS - Energy Safety (1) 4-22-26 (002) (April 22, 2026), p.3

¹¹⁴ Office of Energy Infrastructure Safety, [2023-2025 Base Wildfire Mitigation Plan Technical Guidelines](#), Published December 2022, p. A-24, URL: (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53286&shareable=true>).

¹¹⁵ Office of Energy Infrastructure Safety, 2024 VMA, (December 19, 2025), ([Appendix 1](#)).

International Society of Arboriculture (ISA).¹¹⁶ PacifiCorp provided documentation indicating that its foresters meet the minimum vegetation management qualifications and training as set by PacifiCorp in its WMP, but could not provide documentation regarding the certifications of its contractor's Forest Technicians. PacifiCorp did not provide evidence demonstrating its workforce was qualified and thus did not meet the objective of this initiative.

PacifiCorp's CAP Response

In its CAP, PacifiCorp clarified that the requirement for utility foresters to be certified arborists and its utility specialists to be ISA certified only applies to its direct employees, not its contractor staff. As such, PacifiCorp stated that it provided supporting documentation indicating certifications and years of experience for each of its utility foresters.¹¹⁷

Additionally, PacifiCorp stated that:

Regarding the contracted workforce, which is not included in Statement 24, PacifiCorp relies on the local union and contractors' training programs to ensure they are trained and qualified.”¹¹⁸

As a corrective action PacifiCorp stated that it will develop a process to sample workforce qualifications of its contractors.¹¹⁹

Analysis of PacifiCorp's Performance with the Vegetation Management 2023-2025 WMP Initiatives

Energy Safety concluded that PacifiCorp provided sufficient documentation to support that its vegetation management staff had the proper certifications. PacifiCorp demonstrated that its internal workforce had the required certifications.

PacifiCorp is ultimately responsible for risk reduction in its service territory. A properly trained workforce is required to ensure that vegetation hazards are properly identified in the field and that appropriate mitigations are prescribed to eliminate risk. PacifiCorp relies on a contracted workforce to complete its vegetation management commitments, and the planned corrective actions will allow for an additional level of assurance that its contractors are qualified.

¹¹⁶ PacifiCorp, [2023-2025 Final Wildfire Mitigation Plan Update R2](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56336&shareable=true), Published February 22, 2024, p. 211, URL: (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56336&shareable=true).

¹¹⁷ PacifiCorp, 2024 SVM Audit Corrective Action Plan Rev.0 (January 30, 2026), (Appendix 2).

¹¹⁸ PacifiCorp, 2024 SVM Audit Corrective Action Plan Rev.0 (January 30, 2026), (Appendix 2).

¹¹⁹ PacifiCorp, 2024 SVM Audit Corrective Action Plan Rev.0 (January 30, 2026), (Appendix 2).

Initiative Level Determination

The objective of this initiative was to ensure a qualified workforce performs vegetation management work. PacifiCorp demonstrated that its forest technicians were properly qualified. Therefore, Energy Safety found that PacifiCorp demonstrated completion of its 2024 workforce preparedness commitment and has met the objective of Initiative 8.2.7 Workforce Planning.

3. PACIFICORP'S 2024 VM PROGRAMMATIC PERFORMANCE ASSESSMENT

3.1 Performance assessment of PacifiCorp's VM program

The programmatic assessment is an evaluation of PacifiCorp's VM program maturity. Energy Safety considers PacifiCorp's year-over-year progress in achieving VM objectives, and whether PacifiCorp has implemented the corrective actions as described in CAP responses from previous performance periods. Energy Safety also evaluates the totality of the vegetation management work and initiative level analysis conclusions to determine whether PacifiCorp completed sufficient work in all initiatives within its vegetation management program to meet the stated objectives of the WMP and minimize the risk of catastrophic wildfire posed by electrical lines and equipment.

3.2 2024 VM programmatic level performance analysis

Energy Safety has identified year-over-year deficiencies in PacifiCorp's implementation of its vegetation management program. The method and urgency of PacifiCorp's execution of necessary corrective actions to address deficiencies in its VM program have not demonstrated a commitment to risk reduction and program maturity.

Energy Safety's VMA, dated December 19, 2025, found that PacifiCorp completed all work required by four of the 13 initiatives in its 2023-2025 WMP and was deficient in nine. Of those nine deficient initiatives identified in the VMA, PacifiCorp's CAP (dated January 30, 2025) as

well as follow up documentation (dated April 22, 2026) addressed three of the deficiencies by providing additional documentation to demonstrate that either all work was completed or that PacifiCorp has developed corrective actions to address the deficiencies. However, PacifiCorp did not provide adequate corrective actions to address the deficiency identified in six initiatives: 8.2.3.1.1 Wood and Slash Management, 8.2.3.1.2 Pole Clearing, 8.2.3.2 Clearance, 8.2.3.5 High-Risk Species, 8.2.5. Quality Assurance and Quality Control, and 8.2.6 Open Work Orders.

Many of the deficiencies identified in the 2024 VMA were attributable to a failure to document work. PacifiCorp cannot verify that all work was completed due to insufficient data collection and recordkeeping. Energy Safety first identified inadequacies in PacifiCorp's data management in its 2020 SVM audit.¹²⁰ In response, PacifiCorp's 2020 CAP stated that it "updated its mobile data management software through coordination with its third-party vendor to update data collection forms" so that performance relative to its WMP could be accurately reported.¹²¹ In its 2022 SVM Audit, Energy Safety found that while PacifiCorp had updated several forms within its MDMS system, it still could not fully account for all work commitments in its 2022 WMP.¹²² In its Decision on 2023-2025 WMP "Areas for Continued Improvement," Energy Safety required PacifiCorp to develop work prioritization methods that adequately communicate varying degrees of work priority identified during inspections.¹²³ In its 2024 CAP response, PacifiCorp committed to address multiple deficiencies identified in the 2024 VMA by transitioning to a new MDMS system. PacifiCorp described its plans of how this new system would allow PacifiCorp to track work prioritization, open work orders, substation perimeter inspections, identification of fast growing and high-risk species, and to manage quality control work and provided broad timelines for implementation of these features.¹²⁴ Overall, PacifiCorp was expecting this system to improve tracking of its vegetation management. However, during the March 30, 2026 monthly meeting with Energy Safety, PacifiCorp indicated that it had implemented its new MDMS system in October 2025 but took it off-line in the first quarter of 2026 due

¹²⁰ PacifiCorp's 2020 Substantial Vegetation Management Audit. URL:

[https://efiling.energysafety.ca.gov/EFiling/GetFile.aspx?filePath=D%3a%5cFileThat%5cFileServer%5cPublic%5cPublicDocuments%5c2020-](https://efiling.energysafety.ca.gov/EFiling/GetFile.aspx?filePath=D%3a%5cFileThat%5cFileServer%5cPublic%5cPublicDocuments%5c2020-SVM%2fTN11421_20220824T141930_PacifiCorp_2020_Substantial_Vegetation_Management_Audit.pdf)

[SVM%2fTN11421_20220824T141930_PacifiCorp_2020_Substantial_Vegetation_Management_Audit.pdf](https://efiling.energysafety.ca.gov/EFiling/GetFile.aspx?filePath=D%3a%5cFileThat%5cFileServer%5cPublic%5cPublicDocuments%5c2020-SVM%2fTN11421_20220824T141930_PacifiCorp_2020_Substantial_Vegetation_Management_Audit.pdf)

¹²¹ Energy Safety's Report on PacifiCorp's 2020 Substantial Vegetation Management Audit. URL:

[https://efiling.energysafety.ca.gov/EFiling/GetFile.aspx?filePath=D%3a%5cFileThat%5cFileServer%5cPublic%5cPublicDocuments%5c2020-](https://efiling.energysafety.ca.gov/EFiling/GetFile.aspx?filePath=D%3a%5cFileThat%5cFileServer%5cPublic%5cPublicDocuments%5c2020-SVM%2fTN11574_20221019T101700_Report_on_PacifiCorp%27s_2020_SVM_Audit.pdf)

[SVM%2fTN11574_20221019T101700_Report_on_PacifiCorp%27s_2020_SVM_Audit.pdf](https://efiling.energysafety.ca.gov/EFiling/GetFile.aspx?filePath=D%3a%5cFileThat%5cFileServer%5cPublic%5cPublicDocuments%5c2020-SVM%2fTN11574_20221019T101700_Report_on_PacifiCorp%27s_2020_SVM_Audit.pdf)

¹²² Energy Safety's Report on PacifiCorp's 2022 Substantial Vegetation Management Audit. URL:

https://efiling.energysafety.ca.gov/EFiling/GetFile.aspx?filePath=D%3a%5cFileThat%5cFileServer%5cPublic%5cPublicDocuments%5c2022-SVM%2fTN14803_20240925T210131_PacifiCorp_2022_Audit_and_Report.pdf

¹²³ Decision on 2023-2025 WMP (February 2024), p. 62.

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56309&shareable=true>).

¹²⁴ PacifiCorp's 2024 VM Audit Corrective Action Plan. Appendix 2

unresolvable functionality issues.¹²⁵ Consequently, PacifiCorp reverted to its legacy MDMS system in April of 2026.¹²⁶ PacifiCorp stated that intended to update its legacy MDMS to provide the functionality described in its CAP and was coordinating with its vendor to identify the feasibility of improving its legacy system to provide some of the new features in the interim.¹²⁷ However, PacifiCorp has not identified a timeline in which the updates to its legacy MDMS would be implemented and it did not provide a timeline for troubleshooting the new MDMS system. Therefore, Energy Safety concluded that PacifiCorp's revised corrective actions were not sufficient to ensure that all vegetation work will be completed as described in the WMP. Further, the setbacks and lack of a planning horizon to correct the issues show that PacifiCorp has not prioritized advancing its vegetation management program for wildfire risk reduction.

Additionally, PacifiCorp did not commit to improvements related to wood and slash management. PacifiCorp's lack of debris management was first identified in the 2023 SVM Audit Report. In 2023, PacifiCorp committed to "[...] benchmark debris management data collection with other California utilities to learn how other utilities conduct and track debris management"¹²⁸ and use that information to inform GeoDigital updates. In 2023, Energy Safety highlighted PacifiCorp's lack of a substantive plan to address this deficiency.¹²⁹ In 2024 PacifiCorp made no significant changes to its corrective action plan for wood and slash management. PacifiCorp committed to implement unspecified improvements to its procedures in 2028 for a deficiency identified in 2023, which does not conform to the urgency of the issue.¹³⁰

¹²⁵ Monthly meeting between PacifiCorp and Energy Safety's Environmental Science Division. March 30, 2026, and follow up email sent April 1, 2026.

¹²⁶ Monthly meeting between PacifiCorp and Energy Safety's Environmental Science Division. March 30, 2026, and follow up email sent April 1, 2026.

¹²⁷ PacifiCorp, CA - MDMS - Energy Safety (1) 4-22-26 (002), (April 22, 2026), p.4.

¹²⁸ PacifiCorp's 2023 SVM Audit Corrective Action Plan. P.6

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=58149&shareable=true>).

¹²⁹ PacifiCorp's 2023 SVM Audit Report. P.8

(https://efiling.energysafety.ca.gov/EFiling/GetFile.aspx?filePath=D%3a%5cFileThat%5cFileServer%5cPublic%5cPublicDocuments%5c2023-SVM%2fTN15928_20250530T141304_PacifiCorp_2023_Substantial_Vegetation_Management_Audit_Report.pdf)

¹³⁰ PacifiCorp's 2023 SVM Audit Corrective Action Plan. P.6

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=58149&shareable=true>).

Energy Safety has also identified year-over-year performance issues related to PacifiCorp's pole clearing program. PacifiCorp missed its pole clearing targets in 2020¹³¹, 2023¹³² and 2024.¹³³ In its 2024 CAP, PacifiCorp stated that it has implemented the corrective actions committed to in its 2023 SVM CAP, which included revising its "pole clearing tracking process to more accurately capture poles that are inspected and not worked or are exempt."¹³⁴ PacifiCorp stated that this change would allow for increased accuracy of pole counts and record keeping regarding performance relative to WMP commitments. However, in a monthly meeting between Energy Safety and PacifiCorp, PacifiCorp acknowledged that it does not have a full inventory of all poles in its service territory and focuses its pole clearing activities on poles that have been historically cleared.¹³⁵ During this meeting, PacifiCorp stated that it acknowledged this was an area for improvement and was working towards developing an inventory. Energy Safety will continue to monitor PacifiCorp's development of its pole inventory and improvements to its pole clearing program in future performance years.

While PacifiCorp demonstrated that its QA/QC program was effective in identification of incomplete or improper work (work exceptions), its QA/QC audits resulted in a significant amount of additional work prescriptions. The VMA showed that a majority of work exceptions were for work on distribution lines (99%) and work in HFTD (70%). The prevalence of work exceptions in HFTD was concerning because it suggested that the initial mitigation work did not sufficiently manage risk in these areas at highest risk of wildfire. Of the total number of work exceptions, 58% included mitigation work that was not initially prescribed but was prescribed after the hazard was identified by the QA/QC audit process, and 42% included prescribed work that was not appropriately completed the first time and required rework. PacifiCorp relies on its QA/QC program to identify risk left on its system. Because it did not complete rework on all of its work exceptions and did not have a mechanism to identify the priority of these work exceptions, it left unknown risk on its system.

Overall, PacifiCorp's corrective actions were not sufficient, and it did not demonstrate maturity in its vegetation management programs. While PacifiCorp has completed the majority of the vegetation management work in its WMP and achieved the objectives of seven

¹³¹ Energy Safety's Report on PacifiCorp's 2020 Substantial Vegetation Management Audit. URL: (https://efiling.energysafety.ca.gov/EFiling/GetFile.aspx?filePath=D%3a%5cFileThat%5cFileServer%5cPublic%5cPublicDocuments%5c2020-SVM%2fTN11574_20221019T101700_Report_on_PacifiCorp%27s_2020_SVM_Audit.pdf).

¹³² Energy Safety's Report on PacifiCorp's 2023 Substantial Vegetation Management Audit. URL: (https://efiling.energysafety.ca.gov/EFiling/GetFile.aspx?filePath=D%3a%5cFileThat%5cFileServer%5cPublic%5cPublicDocuments%5c2023-SVM%2fTN15928_20250530T141304_PacifiCorp_2023_Substantial_Vegetation_Management_Audit_Report.pdf).

¹³³ Energy Safety's Report on PacifiCorp's 2024 VM Audit.

¹³⁴ PacifiCorp 2023 SVM Audit Corrective Action attachments. March 25, 2025. URL: (https://efiling.energysafety.ca.gov/EFiling/GetFile.aspx?filePath=D%3a%5cFileThat%5cFileServer%5cPublic%5cPublicDocuments%5c2023-SVM%2fTN15537_20250325T074050_PacifiCorp_2023_SVM_Audit_Corrective_Action_attachments.pdf).

¹³⁵ Monthly meeting between PacifiCorp and Energy Safety's Environmental Science Division. January 30, 2026

of its 13 VM initiatives for performance year 2024, six initiatives still have outstanding deficiencies. Of the six initiatives with deficiencies, PacifiCorp has not provided corrective actions that will address these deficiencies in future performance years.

4. CONCLUSION

Based upon the analysis discussed in Sections 2 and 3, Energy Safety concluded that the method and urgency of PacifiCorp's execution of necessary corrective actions to address deficiencies in its VM program have not demonstrated a commitment to risk reduction and program maturity. In the 2024 performance year, PacifiCorp demonstrated that it either completed or achieved the objective of seven of the 13 VM initiatives. PacifiCorp did not complete and did not provide sufficient corrective actions for six VM initiatives: 8.2.3.1.1 Wood and Slash Management, 8.2.3.1.2 Pole Clearing, 8.2.3.2 Clearance, 8.2.3.5 High-Risk Species, 8.2.5. Quality Assurance and Quality Control, and 8.2.6 Open Work Orders. Energy Safety will continue to review and inspect PacifiCorp's progress on its VM program maturity. Energy Safety expects PacifiCorp to improve its VM program and decrease risk on its system.

DATA DRIVEN FORWARD-THINKING INNOVATIVE SAFETY FOCUSED



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APPENDIX 1. PacifiCorp's 2024 Vegetation Management Audit



APPENDIX DESCRIPTION

Pursuant to Public Utilities Code section 8386.3(b)(5)(A), Energy Safety may annually audit the vegetation management work performed by, or on behalf of, an electrical corporation. The Vegetation Management Audit (VMA) shall identify deficiencies in the electrical corporation's implementation of the vegetation management commitments in its Wildfire Mitigation Plan (WMP).

Energy Safety analyzed each of the 13 vegetation management initiatives listed in PacifiCorp's 2023-2025 WMP for performance year 2024 as part of its VMA.

For each initiative in Section 8.2 (Vegetation Management and Inspections) of PacifiCorp's 2023-2025 Wildfire Mitigation Plan (WMP), Energy Safety identified the quantitative targets and commitments as well as verifiable, narrative statements relevant to each initiative and compared that to the work performed by PacifiCorp in 2024.

This appendix reproduces the information sent to PacifiCorp on August 28, 2025, and describes Energy Safety's analysis and determination of whether PacifiCorp completed all work for each Vegetation Management Initiative.

Energy Safety's analysis included a summary of the information provided by PacifiCorp to substantiate completion of each target or statement, Energy Safety's analysis of that information, and a conclusion regarding completion. Based on the determination of completeness for all targets and statements, Energy Safety provides a finding for each initiative. A finding of "Completed all work" was given only if PacifiCorp provided sufficient documentation or supporting information demonstrating completion of all targets and/or statements within that initiative. If any target or statement was incomplete or insufficiently documented, the overall finding for the initiative was "did not complete all work."

For any commitment or statement for which PacifiCorp was not able to provide supporting documentation or information to support completion, PacifiCorp was asked to address those deficiencies as a part of a corrective action plan (CAP). PacifiCorp's CAP is included in Appendix 2.

PacifiCorp's 2024 WMP Vegetation Management Audit

Audit Date: December 19, 2025

Response Due: January 30, 2025

To: PacifiCorp
Pooja Kishore
Regulatory Affairs Manager
825 NE Multnomah, Suite 2000
Portland, OR 97232

From: Sheryl Bilbrey
Sheryl.Bilbrey@energysafety.ca.gov

CC: Karen McLaughlin, Energy Safety
Chelsea Contreras-Valecia, Energy Safety
Eric Wu, CPUC
Josh Hooely, PacifiCorp
Brian King, PacifiCorp

Subject: Office of Energy Infrastructure Safety's Audit of PacifiCorp's 2024 WMP Vegetation Management Commitments

Pursuant to Public Utilities Code section 8386.3(b)(5)(A), the Office of Energy Infrastructure Safety (Energy Safety) has completed an audit of the WMP vegetation management initiative commitments in PacifiCorp's 2023-2025 Wildfire Mitigation Plan (WMP) for the 2024 performance year.

The audit findings provided in this document are based on Energy Safety's analysis of all relevant data provided to Energy Safety by PacifiCorp to substantiate completion of all vegetation management work commitments in qualitative statements and quantitative targets in its WMP during performance year 2024. Instances where the data provided by PacifiCorp did not substantiate completion of the work associated with the WMP vegetation management initiative commitments are documented as deficiencies in this audit.

Upon receipt of this audit document, PacifiCorp must provide additional data or clarifications to Energy Safety as part of a Corrective Action Plan (CAP), described below. Energy Safety is available to meet with PacifiCorp to discuss the audit findings and provide any clarification necessary for PacifiCorp to prepare the CAP.

Energy Safety will consider all supplemental information and data included in the CAP as part of our analysis of PacifiCorp's performance relative to the 2024 WMP vegetation management initiative commitments. Upon completion of Energy Safety's analysis of the CAP, Energy Safety will publish an Audit Report identifying any outstanding deficiencies in PacifiCorp's implementation or planned corrective actions relative to its vegetation management commitments in the PacifiCorp 2023-2025 WMP.¹³⁶

¹³⁶ PacifiCorp, 2023-2025 Final Wildfire Mitigation Plan Update R2, Published February 22, 2024, pp. 185-187, URL: (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56336&shareable=true>).

PacifiCorp's Corrective Action Plan

The CAP is an opportunity for PacifiCorp to provide supplemental data, additional supporting documentation or clarifying statements for consideration by Energy Safety as part of the analysis of PacifiCorp's implementation or planned corrective actions relative to its vegetation management commitments in the 2023-2025 WMP. To support Energy Safety's performance assessment, the PacifiCorp CAP may include any of the following:

- Supplemental data and/or supporting documentation substantiating completion of all work on the vegetation management commitment identified as deficient in this audit during the 2024 performance year;
- Detailed documentation of constraint(s) that prevented completion of the work commitment and the actions PacifiCorp has taken to resolve those constraints; and
- Description of corrective actions PacifiCorp has implemented or plans to implement to address outstanding deficiencies identified in past or current vegetation management audits.

PacifiCorp must email a copy of its response report to Energy Safety within **30 days** of receipt of this document unless otherwise stated. The list of recipients should include:

- Karen McLaughlin, karen.mclaughlin@energysafety.ca.gov
- Chelsea Contreras-Valencia, Chelsea.Contreras-Valencia@energysafety.ca.gov
- Environmental Science Division, environmentalscience@energysafety.ca.gov

Audit Process Overview

Energy Safety analyzed each of the thirteen vegetation management initiatives listed in PacifiCorp's 2023-2025 WMP¹³⁷ as part of this initial audit report. The WMP identifies the electrical corporation's objectives, preventative strategies, and programs that it has implemented to minimize the risk that its infrastructure will cause catastrophic wildfire. The 13 initiatives include one or more specific work commitments. These commitments include both quantitative targets (e.g., completion of a specified number of inspections) and narrative, but verifiable, statements (e.g., implementation of personnel training programs). Energy Safety then evaluated the work performed by PacifiCorp in performance year 2024 against those targets and statements. Determination of whether all work was complete for each commitment was based on data and documentation submitted by PacifiCorp.

For each initiative in Section 8.2 (Vegetation Management and Inspections) of PacifiCorp's 2023-2025 WMP, quantitative targets and commitments as well as verifiable, narrative statements were assessed for completion. PacifiCorp provided data and documentation to support completion of work for four of the 13 initiatives and did not provide information and documentation to support completion of work for nine initiatives. A summary of Energy Safety's findings regarding the VM initiatives is presented in Table 1. A summary of all work commitments for each initiative and Energy Safety's determination on completeness is presented in Table 2.

For each WMP commitment, a summary of the supporting information provided by PacifiCorp, Energy Safety's analysis of that information, and a conclusion regarding completion are documented. Energy Safety then provides a finding for each initiative. A finding of "complete" was given only if PacifiCorp provided sufficient data or supporting information demonstrating completion of all commitments (targets and/or statements) within that initiative. If any commitment was incomplete or insufficiently documented, the overall finding for the initiative was "deficient."

¹³⁷ PacifiCorp, 2023-2025 Final Wildfire Mitigation Plan Update R2, Published February 22, 2024, pp. 185-187, URL: (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56336&shareable=true>).

Table 1. Summary of Energy Safety’s findings regarding completion of PacifiCorp’s VM Initiatives in its 2023-2025 WMP for compliance year 2024. Deficient initiatives are bold.

Programmatic Area	Vegetation Management Initiative	Audit Finding
8.2.2. Vegetation Management Inspections	8.2.2.1 Detailed Inspections 8.2.2.2 Patrol Inspections	Deficient
8.2.3 Vegetation and Fuels Management	8.2.3.1.1 Wood and Slash Management	Deficient
8.2.3. Vegetation and Fuels Management	8.2.3.1.2 Pole Clearing	Deficient
8.2.3 Vegetation and Fuels Management	8.2.3.2 Clearance	Deficient
8.2.3 Vegetation and Fuels Management	8.2.3.3 Fall-In Mitigation	Complete
8.2.3 Vegetation and Fuels Management	8.2.3.4 Substation Defensible Space	Deficient
8.2.3 Vegetation and Fuels Management	8.2.3.5 High-Risk Species	Deficient
8.2.3 Vegetation and Fuels Management	8.2.3.6 Fire Resilient Right-of-Ways	Complete
8.2.3 Vegetation and Fuels Management	8.2.3.7 Emergency Response Vegetation Management	Complete
8.2.4 Vegetation Management Enterprise System	8.2.4. Vegetation Management Enterprise System	Complete
8.2.5 Quality Assurance and Quality Control	8.2.5. Quality Assurance and Quality Control	Deficient
8.2.6 Open Work Orders	8.2.6 Open Work Orders	Deficient
8.2.7 Workforce Planning	8.2.7 Workforce Planning	Deficient

Table 2. Summary of Energy Safety’s findings regarding completion of PacifiCorp’s WMP commitments in performance year 2024. Deficient commitments are in bold.

WMP Commitment	2024 Target	2024 Actual	Audit Finding
8.2.2.1 Detailed Inspection - Distribution (VM-01)	874 circuit miles	875 line miles	Did not complete all work
8.2.2.1 Detailed Inspection - Transmission (VM-02)	602 line miles	602 line miles	Completed all work
8.2.2.1 Detailed Inspection-Work Plan	Establish distribution and transmission work plan	Achieved	Completed all work
8.2.2.1 Detailed Inspection-Notifications	Notify landowners of needed work on distribution and transmission lines	Achieved	Completed all work
8.2.2.1 Detailed Inspection-Limited Inspections	Address customer and T&D Operations requests	Achieved	Completed all work
8.2.2.1 Detailed Inspection-Transmission Schedule	Main Grid: Annually Local: Once every three years	Did not achieve	Did not complete all work
8.2.2.1 Detailed Inspection-Distribution (VM-01)	Notify landowners of needed work	Achieved	Completed all work
8.2.2.2 Patrol Inspections-Distribution (VM-03)	865 circuit miles	1,035 line miles	Did not complete all work
8.2.2.2 Patrol Inspections-Transmission (VM-04)	99 line miles	119 line miles	Completed all work
8.2.2.2 Patrol Inspections-Work Plan	Establish distribution and transmission work plan	Achieved	Completed all work

WMP Commitment	2024 Target	2024 Actual	Audit Finding
8.2.2.2 Patrol Inspections-Notifications	Notify landowners of needed work on distribution and transmission lines	Achieved	Completed all work
8.2.3.1.1 Wood and Slash Management	Debris management (Chipping removing, recycling slash)	Did not achieve	Did not complete all work
8.2.3.1.2 Pole Clearing (VM-05)	3,126 poles brushed in LRA HFTD areas	1,033 poles brushed in LRA HFTD areas	Did not complete all work
8.2.3.1.2 Pole Clearing (VM-05)	Clear space around pole, removal of dead vegetation, herbicide application	Achieved	Completed all work
8.2.3.2 Clearance	Cycle-based maintenance coupled with annual patrol and corrective maintenance	Achieved	Completed all work
8.2.3.2 Pruning Beyond Minimum Required Clearances	Increased clearance distances based on tree growth rate	Did not achieve	Did not complete all work
8.2.3.2 Pruning Beyond Minimum Required Clearances	Increased clearance distances based on tree physical structure	Did not achieve	Did not complete all work
8.2.3.3 Identifies and Address Hazard Trees (VM-08)	Identifies and Address Hazard Trees	Achieved	Completed all work
8.2.3.4 Substation Defensible Space	Substation Inspection	Did not achieve	Did not complete all work
8.2.3.5 High-Risk Species	Pruning and discretionary removal within HFTD	Did not achieve	Did not complete all work

WMP Commitment	2024 Target	2024 Actual	Audit Finding
8.2.3.6 Integrated Vegetation Management (IVM) to manage vegetation	Identify and address undesirable vegetation	Achieved	Completed all work
8.2.3.6 Right Tree in Right Place/ Small Trees for Small Places	Provide tree replacement vouchers	61 tree replacement vouchers provided	Completed all work
8.2.3.7 Daily Weather Briefings	Conduct targeted patrols when necessary	No targeted patrols were triggered	Performance not assessed
8.2.3.7 Response to Wildfires	Patrol wildfire-impacted areas	Mitigated wildfire-impacted areas	Completed all work
8.2.4 Mobile Data Management Software (MDMS) Data Collection updates	Seek opportunity for improvement	Did not make notable revisions	Performance not assessed
8.2.5 QA/QC – Post-Audits Distribution (Patrol) (VM-11)	865 line miles	1,037 line miles	Completed all work
8.2.5 QA/QC – Post Audits Transmission (Patrol) (VM-11)	99 line miles	116 line miles	Completed all work
8.2.5 Annual Post Audits (VM-11)	Review of detailed and patrol work	Reviewed detailed and patrol work	Completed all work
8.2.5 Corrective Actions (VM-11)	Identify and address corrective actions	Did not achieve	Did not complete all work
8.2.6 Vegetation Work	Vegetation work completed 1-6 weeks after inspection	39% of prescriptions completed after 6 weeks	Did not complete all work
8.2.6 MDMS System	Tracking of work progress	Did not achieve	Did not complete all work

WMP Commitment	2024 Target	2024 Actual	Audit Finding
8.2.6 Open Work Locations	Link prescribed and completed prescriptions	Did not achieve	Did not complete all work
8.2.7 Forester Certification and Training	Certified foresters, provide trainings	Did not achieve	Did not complete all work

Analysis of Initiative Completion

8.2.2 Vegetation Management Inspections

The purpose of this initiative is to describe the “[i]nspections of vegetation around and adjacent to electrical facilities and equipment that may be hazardous by growing, blowing, or falling into electrical facilities or equipment.”¹³⁸ Inspection activities along Distribution and Transmission lines included Detailed and Patrol inspections, which are analyzed in the sub-sections below.

8.2.2.1 Detailed Inspections

Quantitative Target or Commitment, Supporting Information, and Analysis

PacifiCorp included the following target in its 2023-2025 WMP.¹³⁹ For ease of comparison, the WMP target and work completed are summarized below:

Initiative Activity	PacifiCorp’s 2024 Target	Actual Completed in 2024
Detailed Inspection - Distribution	874 circuit miles	875 line miles
Detailed Inspection - Transmission	602 line miles	602 line miles

Supporting Information and Analysis:

Detailed Distribution Inspections Target. PacifiCorp provided its 2024 miles tracker for detailed inspections of distribution lines.¹⁴⁰ The file contained the work code, location information, grid/ circuit number, number of miles in each, scheduled miles to inspect, the number of miles inspected each inspection date, and the total number of miles inspected.

The information provided demonstrated that PacifiCorp completed detailed inspections along 875 distribution line miles in 2024¹⁴¹; however, its target (VM-01) is reported in circuit

¹³⁸ Office of Energy Infrastructure Safety, [2023-2025 Base Wildfire Mitigation Plan Technical Guidelines](#), Published December 2022, p. A-24, URL:

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53286&shareable=true>).

¹³⁹ PacifiCorp, [2023-2025 Final Wildfire Mitigation Plan Update R2](#), Published February 22, 2024, pp. 185-187, URL:

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56336&shareable=true>).

¹⁴⁰ Data Request OEIS-E-SVM_2025-PC-001, Question 2; attachment: “OEIS SVM 2.xlsx.”

¹⁴¹ Data Request OEIS-E-SVM_2025-PC-001, Question 2; Response to OEIS-SVM Data Request 2.

miles. WMP guidelines define circuit miles as "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)"¹⁴² and define line miles as "The number of miles of transmission and/or distribution conductors, including the length of each phase and parallel conductor segment."¹⁴³ PacifiCorp did not provide a mechanism to translate line miles to circuit miles and without this conversion, PacifiCorp did not demonstrate that the documented 875 line miles of inspections are equivalent to or greater than the targeted 874 circuit miles. Therefore, PacifiCorp did not provide sufficient documentation to demonstrate that its detailed inspection-distribution target was met.

Detailed Transmission Inspections Target. PacifiCorp provided its 2024 miles tracker for detailed inspections of transmission lines.¹⁴⁴ The file demonstrated that PacifiCorp conducted detailed inspections along 602 transmission line miles and achieved its detailed inspection transmission target (VM-02) in performance year 2024.

Detailed Inspection Locations. In addition to the line miles, PacifiCorp also provided an Excel file documenting detailed inspection locations and locations where corrective maintenance was prescribed following inspections of distribution¹⁴⁵ and transmission lines.¹⁴⁶ These files contained the date inspected, inspection contractor, location information, work description, number of prescribed tree prunes and removals, Map Object ID (location), HFTD designation, and SRA/FRA/LRA designation. The total number of inspected and prescribed locations along distribution and transmission lines are summarized in the table below. Completion of this work will be discussed under Initiative 8.2.3.2 Clearance below.

¹⁴² PacifiCorp, [2023-2025 Final Wildfire Mitigation Plan Update R2](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56336&shareable=true), Published February 22, 2024, p.333, URL: (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56336&shareable=true).

¹⁴³ PacifiCorp, [2023-2025 Final Wildfire Mitigation Plan Update R2](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56336&shareable=true), Published February 22, 2024, p.336, URL: (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56336&shareable=true).

¹⁴⁴ Data Request OEIS-E-SVM_2025-PC-001 1st Supplemental response to OEIS-SVM Data Request 3; attachment: "OEIS SVM 3.xlsx."

¹⁴⁵ Data Request OEIS-E-SVM_2025-PC-001, Question 20; attachment: "OEIS SVM 8-2 CONF.xlsx."

¹⁴⁶ Data Request OEIS-E-SVM_2025-PC-001, Question 20; attachment: "OEIS SVM 8-3 CONF.xlsx."

Line Type	Non HFTD		HFTD Tier 2		HFTD Tier 3		Total
Distribution Inspections	2,584	(49%)	2,444	(46%)	286	(5%)	5,314
Distribution Inspections with Prescription	2,580	(49%)	2,440	(46%)	286	(5%)	5,306
Transmission inspections	130	(26%)	336	(66%)	41	(8%)	507
Transmission Inspections with Prescriptions	76	(21%)	251	(70%)	31	(9%)	358

Conclusion: PacifiCorp did not provide information consistent with the completion of work for its detailed inspection target for its distribution lines but did provide information consistent with completion of work associated with its detailed inspection target for its transmission lines.

Narrative Statements, Supporting Information, and Analysis

Statement 1

Statement: “Pacific Power develops a workplan identifying distribution circuits to be inspected each year based on the established cycle.”¹⁴⁷

Supporting Information and Analysis: PacifiCorp provided its 2024 work plan that lists distribution and transmission lines scheduled for detailed inspections and vegetation maintenance in 2024.¹⁴⁸ The file included information such as state, district, line/ circuit number, the miles in each circuit, scheduled miles to conduct clearance work along, number of miles planned to receive an inspection and clearance work, and the ratio of cleared to inspected was provided. Based on this file, PacifiCorp planned detailed inspections along 875 distribution circuit miles and 601 transmission circuit miles. The documentation demonstrated that PacifiCorp inspected all planned circuit miles.

Conclusion: PacifiCorp provided information consistent with the completion of work for this statement associated with Detailed Inspections.

¹⁴⁷ PacifiCorp, [2023-2025 Final Wildfire Mitigation Plan Update R2](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56336&shareable=true), Published February 22, 2024, p. 190, URL: (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56336&shareable=true).

¹⁴⁸ Data Request OEIS-E-SVM_2025-PC-001; Question 8; attachment: “OEIS SVM 8-1.xlsx.”

Statement 2

Statement: “During inspection, where corrective actions are identified, landowners are notified of the needed vegetation management work and landowner approvals obtained.”¹⁴⁹

Supporting Information and Analysis: PacifiCorp provided inventory reports of landowner notifications following detailed inspections of distribution lines¹⁵⁰ and transmission lines.¹⁵¹ The inventory reports included the customer contact type of the 5,314 distribution locations and 506 transmission locations where corrective maintenance was prescribed during the detailed inspections. Based on these files, landowners were contacted personally, via door card, telephone, or letter before vegetation management work was performed. Additionally, PacifiCorp included examples of signed property owner permission forms from 2024, indicating that it sought to obtain landowner consent prior to vegetation management work.^{152, 13}

Conclusion: PacifiCorp provided information consistent with the completion of work for this statement associated with Detailed Inspections.

Statement 3

Statement: “Additionally, limited inspections may be conducted/triggered associated with customer requests, agencies, and Pacific Power T&D Operations requests based on observed conditions and/or reliability metrics. Weather events or conditions may also trigger additional limited inspections.”¹⁵³

Supporting Information and Analysis: PacifiCorp provided its customer request reports which provide the request number, processing completion date, inspection date, location information, contact method, and description of work. This file documents 267 requests where customers were concerned with vegetation conditions in 2024.¹⁵⁴

PacifiCorp also provided files which documented “ticket work,” or the mitigations conducted in response to customer and T&D Operations requests along distribution lines¹⁵⁵ and transmission lines.¹⁵⁶ These files included the date inspected, work code, work description,

¹⁴⁹ PacifiCorp, [2023-2025 Final Wildfire Mitigation Plan Update R2](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56336&shareable=true), Published February 22, 2024, p. 191, URL: (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56336&shareable=true).

¹⁵⁰ Data Request OEIS-E-SVM_2025-PC-001; Question 15; attachment: “OEIS SVM 8-2 CONF.xlsx.”

¹⁵¹ Data Request OEIS-E-SVM_2025-PC-001; Question 15; attachment: “OEIS SVM 8-3 CONF.xlsx.”

¹⁵² Data Request OEIS-E-SVM_2025-PC-001; Question 9; attachment: “OEIS SVM 9.xlsx.”

¹⁵³ PacifiCorp, [2023-2025 Final Wildfire Mitigation Plan Update R2](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56336&shareable=true), Published February 22, 2024, p. 195, URL: (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56336&shareable=true).

¹⁵⁴ Data Request OEIS-E-SVM_2025-PC-001, Question 12; attachment: “OEIS SVM 12-3.xlsx.”

¹⁵⁵ Data Request OEIS-E-SVM_2025-PC-001, Question 12; attachment: “OEIS SVM 12-1. CONF.xlsx.”

¹⁵⁶ Data Request OEIS-E-SVM_2025-PC-001, Question 12; attachment: “OEIS SVM 12-2 CONF.xlsx.”

number of prunes and secondary removals requested, location, HFTD designation, and SRA/LRA/FRA designation. Based on this file, there were 25 total ticketed works along distribution lines, and 12 ticketed works along transmission lines, demonstrating that limited inspections were conducted in response to customer requests along distribution and transmission lines.

Conclusion: PacifiCorp provided information consistent with the completion of work for this statement associated with Detailed Inspections.

Statement 4

Statement: “Detailed inspections of transmission lines are generally scheduled as follows:

- Main Grid Transmission: Annually
 - Pacific Power lineman conduct annual inspection of main grid transmission lines in compliance with R4 of NERC Standard FAC-003. Pacific Power vegetation management detailed inspections supplement lineman inspections.
- Local Transmission: At a minimum once every three years, in conjunction with the distribution detailed inspection.”¹⁵⁷

Supporting Information and Analysis: PacifiCorp Provided an Excel file documenting the main grid transmission (MHS) and local transmission (THS) lines detailed inspection work plan.¹⁵⁸ This file showed that annual inspections were planned along 3 MHS lines from 2022 to 2024, and that inspections were planned along 24 THS lines at least once every three years. PacifiCorp only submitted evidence that detailed inspections were completed along one THS line,^{159, 160} and the work plan provided by PacifiCorp does not provide sufficient evidence to demonstrate that the remaining 3 MHS and 23 THS line inspections were completed as planned.

Conclusion: PacifiCorp did not provide information consistent with the completion of work for this statement associated with Detailed Inspections - Transmission.

¹⁵⁷ PacifiCorp, [2023-2025 Final Wildfire Mitigation Plan Update R2](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56336&shareable=true), Published February 22, 2024, p. 195, URL: (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56336&shareable=true).

¹⁵⁸ Data Request OEIS-E-SVM_2025-PC-001, Question 11; attachment: “OEIS SVM 11.xlsx.”

¹⁵⁹ Data Request OEIS-E-SVM_2025-PC-002, Question 2.3; Response to OEIS-SVM Data Request 2.3.

¹⁶⁰ Data Request OEIS-E-SVM_2025-PC-002, Question 2.3; attachment: “OEIS SVM Set 2 Data Request 3-1.xlsx.”

8.2.2.2 Patrol Inspections

Quantitative Target or Commitment, Supporting Information, and Analysis

PacifiCorp included the following target in its 2023-2025 WMP.¹⁶¹ For ease of comparison, the WMP target and work completed are summarized below:

Initiative Activity	PacifiCorp's 2024 Target	Actual Completed in 2024
Patrol Inspection – Distribution (VM-03)	865 circuit miles	1,035 line miles
Patrol Inspection – Transmission (VM-04)	99 line miles	119 line miles

Supporting Information and Analysis:

Distribution Patrol Inspections Target. PacifiCorp provided its 2024 miles tracker for patrol inspections of distribution lines.¹⁶² Under the “F Code History” tab, the file included work code, location information, grid/ circuit number, number of miles, miles scheduled for inspection, date of inspection, the number of miles inspected, and the total number of miles inspected under work code “FIN” (patrol inspection of distribution lines) and work code “FIT” (patrol inspection of transmission lines).

The information provided demonstrated that PacifiCorp completed patrol inspections along 1,035 distribution line miles in 2024; however, its target (VM-03) is in units of circuit miles. PacifiCorp did not provide a mechanism to convert line miles to circuit miles and without this conversion factor, PacifiCorp did not demonstrate that the documented 1,035 line miles of inspections are equivalent to or greater than the targeted 865 circuit miles. Therefore, PacifiCorp did not provide sufficient documentation that its patrol inspection-distribution target was met.

Transmission Patrol Inspections Target. PacifiCorp provided its 2024 miles tracker for patrol inspections of transmission lines.¹⁶³ The file demonstrated that PacifiCorp conducted patrol inspections along 119 transmission line miles and achieved its patrol inspection transmission target (VM-04) in performance year 2024.

Patrol Inspection Locations. In addition to line miles, PacifiCorp also provided Excel files documenting locations which were prescribed corrective maintenance during patrol

¹⁶¹ PacifiCorp, [2023-2025 Final Wildfire Mitigation Plan Update R2](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56336&shareable=true), Published February 22, 2024, pp. 185-187, URL: (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56336&shareable=true).

¹⁶² Data Request OEIS-E-SVM_2025-PC-001, Question 4; attachment: “OEIS SVM 4.xlsx.”

¹⁶³ Data Request OEIS-E-SVM_2025-PC-001, Question 5; attachment: “OEIS SVM 5.xlsx.”

inspections of distribution lines¹⁶⁴ and transmission lines.¹⁶⁵ These files contained the date inspected, inspection contractor, location information, work code, customer contact, work description, number of prescribed prunes and removals, HFTD designation, and SRA/FRA/LRA designation. Based on this file, there were 2,851 locations prescribed vegetation work during patrol inspections of distribution lines, and 41 locations prescribed vegetation work along transmission lines. Completion of this work will be discussed under Initiative 8.2.3.2 Clearance below.

Locations where vegetation work was prescribed during the patrol inspections are categorized below by HFTD designation:

Inspection Type	Non HFTD		HFTD Tier 2		HFTD Tier 3		Total
Transmission inspections	32	78%	9	22%	0	0%	41
Transmission inspections with prescription	28	85%	5	15%	0	0%	33
Distribution inspections	945	33%	1713	60%	194	7%	2852
Distribution inspections with prescription	938	33%	1709	60%	194	7%	2841

Based on the information provided, most of the locations were identified in HFTD 2 designated areas and approximately only 7% were identified in HFTD 3 designated areas

Conclusion: PacifiCorp did not provide information consistent with the completion of work for its patrol inspection target for its distribution lines but did provide information consistent with completion of work associated with its patrol inspection target for its transmission lines.

Narrative Statements, Supporting Information, and Analysis

Statement 5

Statements: “Pacific Power develops a workplan identifying distribution circuits to be inspected each year based on the established cycle.”¹⁶⁶

¹⁶⁴ Data Request OEIS-E-SVM_2025-PC-001, Question 13; attachment: “OEIS SVM 13-1 CONF.xlsx.”

¹⁶⁵ Data Request OEIS-E-SVM_2025-PC-001, Question 15; attachment: “OEIS SVM 15 CONF.xlsx.”

¹⁶⁶ PacifiCorp, [2023-2025 Final Wildfire Mitigation Plan Update R2](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56336&shareable=true), Published February 22, 2024, p. 196, URL: (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56336&shareable=true).

“Pacific Power develops a workplan identifying transmission circuits to be inspected each year based on the established cycle.”¹⁶⁷

Supporting Information and Analysis: PacifiCorp provided an example of its 2024 work plan that lists distribution and transmission lines scheduled for patrol inspections in 2024.¹⁶⁸ Under the “INTERNAL – FCODE” tab, information such as location, line/ circuit number, miles in each circuit, miles scheduled for clearance work, and the number of miles scheduled inspection and clearance work was provided. Based on work code “FIN” (patrol inspection of distribution lines), 1,035 distribution circuit miles were scheduled for patrol inspection.¹⁶⁹ Based on work code “FIT” (patrol inspection of transmission lines), 118 transmission circuit miles were scheduled for patrol inspection. The numbers of circuit miles planned match the total number of miles inspected.

Conclusion: PacifiCorp provided information consistent with the completion of work for this statement associated with Patrol Inspections.

Statement 6

Statement: “During inspection, where corrective actions are identified, landowners are notified of the needed vegetation management work and landowner approvals obtained.”¹⁷⁰

Supporting Information and Analysis: PacifiCorp provided inventory reports of landowner notifications following patrol inspections of distribution¹⁷¹ and transmission lines.¹⁷² The inventory report includes evidence of customer notifications for all 2,851 unique locations along distribution lines and all 41 locations along transmission lines that were prescribed vegetation work. Based on this file, landowners were contacted personally, via door card, telephone, or letter before vegetation management work was performed. Additionally, PacifiCorp included examples of signed property owner permission forms from 2024, indicating that it sought to obtain landowner consent prior to vegetation management work.¹⁷³

Conclusion: PacifiCorp provided information consistent with the completion of work for this statement associated with Patrol Inspections.

¹⁶⁷ PacifiCorp, [2023-2025 Final Wildfire Mitigation Plan Update R2](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56336&shareable=true), Published February 22, 2024, p. 196, URL: (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56336&shareable=true).

¹⁶⁸ Data Request OEIS-E-SVM_2025-PC-001, Question 14; attachment: “OEIS SVM 8-1.xls.”

¹⁶⁹ Data Request OEIS-E-SVM_2025-PC-002, Question 2.4; Response to OEIS-SVM Data Request 2.4.

¹⁷⁰ PacifiCorp, [2023-2025 Final Wildfire Mitigation Plan Update R2](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56336&shareable=true), Published February 22, 2024, p. 196, URL: (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56336&shareable=true).

¹⁷¹ Data Request OEIS-E-SVM_2025-PC-001; Question 15; attachment: “OEIS SVM 13-1 CONF.xls.”

¹⁷² Data Request OEIS-E-SVM_2025-PC-001; Question 15; attachment: “OEIS SVM 15 CONF.xls.”

¹⁷³ Data Request OEIS-E-SVM_2025-PC-001; Question 9; attachment: “OEIS SVM 9.pdf.”

Finding – 8.2.2 Vegetation Management Inspections

PacifiCorp did not provide information consistent with the completion of all work identified in 8.2.2.1 detailed inspections and management practices for vegetation clearances around distribution electrical lines and equipment and 8.2.2.3 patrol inspections of vegetation around distribution electric lines and equipment. Therefore, Energy Safety concludes that Initiative 8.2.2 Vegetation Management Inspections is deficient.

In its CAP, PacifiCorp must provide its definition of circuit and line miles, as well as a conversion tool that would allow Energy Safety to determine that the number of circuit miles in its distribution detailed and patrol inspections targets were met in 2024. Alternatively, PacifiCorp must provide corrective actions to ensure that the distribution inspection targets will be met in the unit of measure specified in the WMP in future performance years.

8.2.3.1.1 Vegetation and Fuels Management – Wood and Slash Management

The purpose of this initiative is to take actions “to manage all downed wood and “slash” generated from vegetation management activities.”¹⁷⁴

Narrative Statements, Supporting Information, and Analysis

Statement 7

Statement: “Pacific Power manages slash in developed areas by chipping or removing (recycles where practicable) it where accessible, unless the property owner indicates otherwise. In rural, off-road areas Pacific Power uses a lop and scatter and chipping (where accessible) practice to reduce the volume of available fuel within the right-of-way and adheres with land managing agency requirements.”¹⁷⁵

Supporting Information and Analysis: PacifiCorp explained that while removing slash from tree canopy is not a documented activity, if slash remains in the canopy during post-audit, then it would be noted as an audit exception.¹⁷⁶ PacifiCorp also explained that direction regarding debris management was recorded by the inspector in PacifiCorp’s mobile data

¹⁷⁴ Office of Energy Infrastructure Safety, [2023-2025 Base Wildfire Mitigation Plan Technical Guidelines](#), Published December 2022, p. A-24, URL: (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53286&shareable=true>).

¹⁷⁵ PacifiCorp, [2023-2025 Final Wildfire Mitigation Plan Update R2](#), Published February 22, 2024, p. 200, URL: (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56336&shareable=true>).

¹⁷⁶ Data Request OEIS-E-SVM_2025-PC-001, Question 17; attachment: Response to OEIS-SVM Data Request 17.

management software. PacifiCorp provided an Excel file documenting debris management work prescribed along distribution lines (224 work orders)¹⁷⁷ following detailed and patrol inspections. PacifiCorp also provided an Excel file documenting debris management work prescribed along transmission lines (23 work orders),¹⁷⁸ but only from detailed inspections. Based on these files, there were a total of 247 work orders prescribing debris management including chipping and lop-and-scatter; however, none of these work orders had a work completion date.

Additionally, there were 8,017 locations prescribed corrective maintenance during detailed and patrol inspections of distribution¹³⁵ and transmission¹³⁶ lines (described in section 8.2.6 Open Work Orders), more than the 247 locations with work orders which prescribed debris management. Therefore, PacifiCorp did not provide sufficient evidence to demonstrate that wood and slash were properly managed at all of its work sites in performance year 2024.

Conclusion: PacifiCorp did not provide information consistent with the completion of work for this statement associated with Vegetation and Fuels Management – Wood and Slash Management.

Finding – 8.2.3.1.1 Wood and Slash Management

PacifiCorp did not provide information consistent with the completion of work identified in this initiative. Therefore, Energy Safety concludes Initiative 8.2.3.1.1 Wood and Slash Management is deficient.

In its CAP response PacifiCorp must either provide additional documentation to support that wood and slash was properly managed at all of its work sites or provide corrective actions addressing the deficiency.

8.2.3.1.2 Vegetation and Fuels Management – Pole Clearing

The purpose of this initiative is to describe the “[p]lan and execution of vegetation removal around poles per Public Resources Code section 4292 and outside the requirements of Public Resources Code section 4292 (e.g., pole clearing performed outside of the State Responsibility Area).”¹⁷⁹

¹⁷⁷ Data Request OEIS-E-SVM_2025-PC-001, Question 17; attachment: “OEIS SVM 17-1.xls.”

¹⁷⁸ Data Request OEIS-E-SVM_2025-PC-001, Question 17; attachment: “OEIS SVM 17-2.xls.”

¹⁷⁹ Office of Energy Infrastructure Safety, [2023-2025 Base Wildfire Mitigation Plan Technical Guidelines](#), Published December 2022, p. A-24, URL: (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53286&shareable=true>).

Quantitative Target or Commitment, Supporting Information, and Analysis

PacifiCorp included the following target in its 2023-2025 WMP.¹⁸⁰ For ease of comparison, the WMP target and work completed are summarized below:

Initiative Activity	PacifiCorp's 2024 Target	Actual Completed in 2024
Fuels Management – Pole Clearing beyond PRC 4292	3,126 poles brushed in LRA HFTD areas	1,033 poles brushed in LRA HFTD areas

Supporting Information and Analysis: In its WMP, PacifiCorp stated “In addition to state required pole clearing activities, Pacific Power addresses vegetation adjacent to “subject” poles in local responsibility areas to further reduce wildfire ignition risks and increase wildfire resiliency.”¹⁸¹ PacifiCorp explained that pole brushing beyond Public Resources Code (PRC) 4292 includes conducting pole brushing activities on poles (addressing vegetation adjacent to poles) that are outside the scope of PRC 4292.¹⁸² Since PRC 4292 is applicable to State Responsibility Areas (SRA), PacifiCorp considered pole brushing conducted on subject poles in Local Responsibility Areas (LRA) to be “beyond PRC 4292.”

PacifiCorp provided documentation supporting the inspection of 3,257 poles in LRA in performance year 2024.^{183,184} However, the WMP target specified that 3,126 poles in LRA HFTD must be cleared, and only 1,033 poles received clearance work in LRA HFTD areas.^{185,186} Therefore, PacifiCorp did not complete all work associated with this target.

In its defense of missing its pole clearing target, PacifiCorp stated that it satisfied the intent of the initiative because it inspected more poles than the WMP target, with intent to clear the poles as needed. While Energy Safety recognizes PacifiCorp's efforts to mitigate poles in the service territory, the target is to inspect and clear poles in high-risk areas, which was not demonstrated in the documentation provided.

¹⁸⁰ PacifiCorp, [2023-2025 Final Wildfire Mitigation Plan Update R2](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56336&shareable=true), Published February 22, 2024, pp. 185-187, URL: (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56336&shareable=true).

¹⁸¹ PacifiCorp, [2023-2025 Final Wildfire Mitigation Plan Update R2](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56336&shareable=true), Published February 22, 2024, pp. 201-202, URL: (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56336&shareable=true).

¹⁸² Data Request OEIS-E-SVM_2025-PC-002, Question 2.5; Response to OEIS-SVM Data Request 2.5.

¹⁸³ PacifiCorp's 1st Supplemental Responses to CA 2023-2025 WMP - OEIS SVM (1 3 and 8) 06-17-2025 (002), Question 1; 1st attachment: “OEIS-SVM 1-1 1st SUPP.”

¹⁸⁴ PacifiCorp's 1st Supplemental Responses to CA 2023-2025 WMP - OEIS SVM (1 3 and 8) 06-17-2025 (002), Question 1; 1st Supplemental Response to OEIS-SVM Data Request 1.

¹⁸⁵ Data Request OEIS-E-SVM_2025-PC-002, Question 2.5; attachment: “OEIS Set 2 Data Request-5-1.xlsx”

¹⁸⁶ Data Request OEIS-E-SVM_2025-PC-002, Question 2.1; Response to OEIS-SVM Data Request 2.1.

PacifiCorp further stated, that, due to ongoing system hardening projects, the number of poles cleared was less than the prior year target, as the pool of eligible poles decreases.¹⁸⁷ While Energy Safety recognizes that system hardening would reduce the amount of poles that would require brushing, PacifiCorp did not demonstrate that the number of poles that have received this hardening would justify such a significant reduction in the number of poles brushed within its service territory.

Conclusion: PacifiCorp did not provide information consistent with the completion of work for this target associated with Vegetation and Fuels Management – Pole Clearing.

Narrative Statements, Supporting Information, and Analysis

Statement 8

Statement: “Consistent with California Public Resource Code (PRC) § 4292, Pacific Power conducts pole clearing activities involving removal of all vegetation within a 10-foot radius cylinder (up to 8 feet vertically) of clear space around a subject pole, removal of dead vegetation from 8 feet to the highest point of the conductor, and applying herbicides and/or soil sterilant to prevent any vegetation regrowth (unless prohibited by law or the property owner). This WMP tracking activity is tracked with Tracking ID# VM-05”.¹⁸⁸

Supporting Information and Analysis: PacifiCorp provided an Excel file which demonstrated that a total of 2,947 poles were cleared and 726 poles received herbicide treatment in LRA, FRA, and SRA designated areas in performance year 2024, consistent with PRC 4292.¹⁸⁹

As evidence that PacifiCorp followed its pole clearing program,¹⁹⁰ it also provided a screen shot of the treatment report of a pole on line 5G2.¹⁹¹

Conclusion: PacifiCorp provided information consistent with the completion of work for this statement associated with Vegetation and Fuels Management – Pole Clearing.

¹⁸⁷ Data Request OEIS-E-SVM_2025-PC-002, Question 2.1; Response to OEIS-SVM Data Request 2.1.

¹⁸⁸ PacifiCorp, [2023-2025 Final Wildfire Mitigation Plan Update R2](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56336&shareable=true), Published February 22, 2024, p. 201, URL: (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56336&shareable=true).

¹⁸⁹ Data Request OEIS-E-SVM_2025-PC-001, Question 18; attachment: “OEIS SVM 1-2.xls.”

¹⁹⁰ Data Request OEIS-E-SVM_2025-PC-001, Question 18; attachment: “OEIS SVM 18.pdf.”

¹⁹¹ Data Request OEIS-E-SVM_2025-PC-001, Question 18; Response to OEIS-SVM Data Request 18.

Finding – 8.2.3.1.2 Pole Clearing

PacifiCorp did not provide information consistent with the completion of work identified in this initiative. Therefore, Energy Safety concludes that initiative 8.2.3.1.2 Pole Clearing is deficient.

In its CAP response PacifiCorp must either provide additional documentation that the pole clearing commitment in LRA HFRA was completed or provide corrective actions which will ensure the work is completed in future compliance years.

8.2.3.2 Vegetation and Fuels Management –Clearance

The purpose of this initiative is to take actions “after inspection to ensure that vegetation does not encroach upon electrical equipment and facilities, such as tree trimming.”¹⁹²

Narrative Statements, Supporting Information, and Analysis

Statement 9

Statement: “Pacific Power conducts cycle-based maintenance coupled with annual patrol and corrective maintenance (incremental to routine maintenance) to maintain required minimum clearance distances as identified in Table 1 of GO 95.”¹⁹³

Supporting Information and Analysis: PacifiCorp provided its Distribution Inventory Report¹⁹⁴ and Transmission Inventory Report.¹⁹⁵ These files document of the work inventory for both detailed and patrol inspections which occurred between October 2023- December 2024 which received work between January 2024- March 2025.¹⁹⁶ These time frames are inclusive of all work which overlaps with performance year 2024 (in which either the inspection or the mitigation work was completed in performance year 2024). These Excel files include the date inspected, work completion date, time difference between both dates in days, location information, work code, contact type, work description, number of cycle busters addressed, number of prunes and removals completed at each location. For detailed inspections, these

¹⁹² Office of Energy Infrastructure Safety, [2023-2025 Base Wildfire Mitigation Plan Technical Guidelines](#), Published December 2022, p. A-24, URL:

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53286&shareable=true>).

¹⁹³ PacifiCorp, [2023-2025 Final Wildfire Mitigation Plan Update R2](#), Published February 22, 2024, p. 202, URL:

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56336&shareable=true>).

¹⁹⁴ Data Request OEIS-E-SVM_2025-PC-002, Question 2.21; attachment: “OEIS SVM Set 2 Data Request 19-1.xlsx.”

¹⁹⁵ Data Request OEIS-E-SVM_2025-PC-002, Question 2.19; attachment: “OEIS SVM Set 2 Data Request 20-1.xlsx.”

¹⁹⁶ Data Request OEIS-E-SVM_2025-PC-002, Question 2.19; attachment: “OEIS SVM Set 2 Data Request 19-1.xlsx.”

files reported that 4,920 distribution line locations where work was prescribed during detailed inspections subsequently received this work and 316 transmission line locations prescribed work during detailed inspections subsequently received this work. For patrol inspections, 2,733 locations along distribution lines which were prescribed work during patrol inspections received that work and 46 locations along transmission lines subsequently received work.

The documentation PacifiCorp provided demonstrated that it completed the mitigation work that was prescribed during inspections throughout 2024.

PacifiCorp's ability to complete work orders within the target timeframe is discussed under Initiative 8.2.6 Open Work Orders.

Conclusion: PacifiCorp provided information consistent with the completion of work for this statement associated with Vegetation and Fuels Management –Clearance.

Statement 10

Statement: “Pacific Power also prunes vegetation beyond minimum required clearances in multiple ways as presented in the Vegetation SOP. First, Pacific Power uses increased clearance distances on distribution lines for certain species of trees, depending on tree growth rate. Pacific Power separates vegetation into three categories: (a) slow-growing; (b) moderate growing; and (c) fast growing. In all cases, Pacific Power applies the 12-foot minimum post-work clearance for slow-growing species. In certain cases, Pacific Power applies an increased clearance for moderate growing and fast-growing species.”¹⁹⁷

Supporting Information and Analysis: PacifiCorp provided an Excel file which documents the work conducted as a result of detailed and patrol inspections of distribution lines.¹⁹⁸ This file includes the date work was completed, district, feeder, work code, location, work summary, number of tree units pruned and cleared, HFTD and SRA/LRA/FRA designation. PacifiCorp provided an additional file documenting the work conducted based on conditions identified during detailed and patrol inspections of local and main grid transmission lines.¹⁹⁹ This file also has the date work was completed, district, feeder, work code, location, work summary, number of tree units pruned and cleared, HFTD and SRA/LRA/FRA designation.

While PacifiCorp was able to provide data which demonstrated that clearance work was completed, PacifiCorp explained that it does not record growth rates nor clearance distance achieved at time of pruning. Therefore, PacifiCorp could not demonstrate that a 12-foot

¹⁹⁷ PacifiCorp, [2023-2025 Final Wildfire Mitigation Plan Update R2](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56336&shareable=true), Published February 22, 2024, p. 202, URL: (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56336&shareable=true).

¹⁹⁸ Data Request OEIS-E-SVM_2025-PC-001, Question 21; attachment: “OEIS SVM 21-1 CONF.xls.”

¹⁹⁹ Data Request OEIS-E-SVM_2025-PC-001, Question 21; attachment: “OEIS SVM 21-2 CONF.xls.”

minimum clearance was applied for slow-growing species, nor that increased clearance was applied for moderate and fast-growing species at time of pruning.

Conclusion: PacifiCorp did not provide information consistent with the completion of work for this statement associated with Vegetation and Fuels Management –Clearance.

Statement 11

Statement: “Third, as a practical matter, Pacific Power will often prune beyond the minimum required distances because of the physical structure of the tree. Pacific Power uses natural target pruning.”²⁰⁰

Supporting Information and Analysis: PacifiCorp explained that it does not track post work clearance distances achieved nor the use of natural target pruning techniques as metrics.²⁰¹ Therefore, PacifiCorp was unable to provide documentation to demonstrate that natural target pruning was completed as a method to prune vegetation beyond minimum required clearances.

Conclusion: PacifiCorp did not provide information consistent with the completion of work for this statement associated with Vegetation and Fuels Management –Clearance.

Finding – 8.2.3.2 Clearance

PacifiCorp did not provide information consistent with the completion of work identified in this initiative. Therefore, Energy Safety concludes that initiative 8.2.3.2 Clearance is deficient.

In its CAP response PacifiCorp must provide corrective actions it plans to implement to track enhanced clearances-based species’ growth rates and the trees physical structure.

8.2.3.3 Vegetation and Fuels Management – Fall-In Mitigation

The purpose of this initiative is to take actions “to identify and remove or otherwise remediate trees that pose a high risk of failure or fracture that could potentially strike electrical equipment.”²⁰²

²⁰⁰ PacifiCorp, [2023-2025 Final Wildfire Mitigation Plan Update R2](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56336&shareable=true), Published February 22, 2024, p. 202, URL: (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56336&shareable=true).

²⁰¹ Data Request OEIS-E-SVM_2025-PC-001, Question 22; Response to OEIS-SVM Data Request 22.

²⁰² Office of Energy Infrastructure Safety, [2023-2025 Base Wildfire Mitigation Plan Technical Guidelines](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53286&shareable=true), Published December 2022, p. A-24, URL: (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53286&shareable=true).

Narrative Statements, Supporting Information, and Analysis

Statement 12

Statement: “Pacific Power identifies and addresses fall-in risk, or hazard trees as part of routine maintenance (detailed inspections) and annual patrols (circuits within or partially within HFTD). Hazard trees identified during inspections are removed or pruned sufficiently to eliminate the hazard. In addition to inspections conducted by vegetation management contractors/personnel, Pacific Power district operations (through line inspections they conduct), customers, agencies, etc., may identify fall-in risk conditions that are vetted by vegetation management and mitigated as warranted.”²⁰³

Supporting Information and Analysis: PacifiCorp explained that “reliability removals” refers to the number of hazard trees and directs staff to remove a tree that is posing a hazard such as a large limb that is dead to remove the risk.^{204,205} In contrast, “reliability prunes” refer to trees that pose a fall-in risk (in addition to hazard trees) and typically include healthy trees with a dead limb within strike distance of conductor upon failure, directing staff to prune the hazard tree identified.^{206,207}

Fall in mitigation along distribution lines. PacifiCorp provided an Excel file documenting the number of reliability removals (hazard trees) and reliability prunes (dead tree limbs within strike distance of conductor upon failure that pose a fall-in risk) completed as a result of detailed and patrol inspections of its distribution lines.²⁰⁸

Prunes and removals completed along distribution lines post-detailed and patrol inspections are categorized below by HFTD designation:

²⁰³ PacifiCorp, [2023-2025 Final Wildfire Mitigation Plan Update R2](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56336&shareable=true), Published February 22, 2024, p. 203, URL: (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56336&shareable=true).

²⁰⁴ Data Request OEIS-E-SVM_2025-PC-001, Question 24; Response to OEIS-SVM Data Request 24.

²⁰⁵ Data Request OEIS-E-SVM_2025-PC-002, Question 2.7; Response to OEIS-SVM Data Request 2.7.

²⁰⁶ Data Request OEIS-E-SVM_2025-PC-001, Question 24; Response to OEIS-SVM Data Request 24.

²⁰⁷ Data Request OEIS-E-SVM_2025-PC-002, Question 2.7; Response to OEIS-SVM Data Request 2.7.

²⁰⁸ Data Request OEIS-E-SVM_2025-PC-001, Question 24; “Attachment OEIS SVM 24-1 CONF.xlsx.”

Line/ Inspection Type	HFTD 2		HFTD 3		Non-HFTD		Total
Post-Detailed Inspection Prunes	145	(57%)	18	(7%)	92	(36%)	255
Post-Detailed Inspection Removal	1,004	(73%)	189	(14%)	191	(14%)	1384
Post-Patrol Inspection Prunes	113	(51%)	10	(4%)	100	(45%)	223
Post-Patrol Inspection Removals	1,011	(72%)	123	(9%)	263	(19%)	1397
Total	2,273	(70%)	340	(10%)	646	(20%)	3259

Fall in mitigation along transmission lines. PacifiCorp also provided Excel files that documented the number of reliability removals (hazard trees) and reliability prunes (dead tree limbs within strike distance of conductor upon failure that pose a fall-in risk) completed as a result of detailed and patrol inspections of local and main grid transmission lines.²⁰⁹

Prunes and removals completed along transmission lines post-detailed and patrol inspections are categorized below by HFTD designation:

²⁰⁹ Data Request OEIS-E-SVM_2025-PC-001, Question 24; "Attachment OEIS SVM 24-2 CONF.xlsx."

Line/ Inspection Type	HFTD 2		HFTD 3		Non-HFTD		Total
Post-Detail Inspection Prunes	10	(56%)	3	(17%)	5	(28%)	18
Post-Detail Inspection Removals	360	(81%)	70	(16%)	14	(3%)	444
Post-Patrol Inspection Prunes	9	(90%)	0	(0%)	1	(10%)	10
Post-Patrol Inspection Removals	274	(86%)	0	(0%)	45	(14%)	319
Total	653	(83%)	73	(9%)	65	(8%)	791

Conclusion: PacifiCorp provided information consistent with the completion of work identified in this statement.

Finding – 8.2.3.3 Fall-In Mitigation

PacifiCorp provided information consistent with the completion of work identified in 8.2.3.3 Fall-In Mitigation. Therefore, Energy Safety concludes initiative 8.2.3.3 Fall-In Mitigation is complete.

8.2.3.4 Vegetation and Fuels Management –Substation Defensible Space

The purpose of this initiative is to take actions “to reduce ignition probability and wildfire consequence due to contact with substation equipment.”²¹⁰

²¹⁰ Office of Energy Infrastructure Safety, [2023-2025 Base Wildfire Mitigation Plan Technical Guidelines](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53286&shareable=true), Published December 2022, p. A-24, URL: (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53286&shareable=true).

Narrative Statements, Supporting Information, and Analysis

Statement 13

Statement: “Pacific Power performs substation inspections for vegetation to remove overhang limbs or climbable vegetation and remove weeds. As part of the detailed and patrol inspections, hazard trees are identified and mitigated to address fall-in risk.”²¹¹

Supporting Information and Analysis: PacifiCorp was unable to provide documentation demonstrating that lines connecting to a substation were inspected and that vegetation hazard identifications took place within substation defensible spaces.²¹² However, PacifiCorp did provide evidence of work orders completed (443 substation work orders) within a substation, providing evidence that at least 55 substations received some form of inspection and vegetation work.²¹³ This file documented the service area, location description (substation), work order description, order date, completion date, observations (if deemed acceptable or not), and work prescribed.

PacifiCorp explained that (1) reviewing vegetation around substations was part of detailed and patrol inspections, and (2) that PacifiCorp does not track inspection of substation perimeters. While the work orders provided by PacifiCorp documented work conducted within substations in performance year 2024, it did not discretely track inspections of defensible space around substations including the number of trees assessed outside a substation that could be hazardous to the substation. PacifiCorp also referenced a weed abatement tracker detailing the dates substations were sprayed and sample weed abatement daily reports from Substation Operations.²¹⁴ However, PacifiCorp did not provide this file to Energy Safety. Therefore, PacifiCorp did not provide sufficient evidence it met the objective of this initiative to reduce probability of wildfire ignitions due to contact with substation equipment.

Conclusion: PacifiCorp did not provide information consistent with the completion of work identified in this statement.

²¹¹ PacifiCorp, [2023-2025 Final Wildfire Mitigation Plan Update R2](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56336&shareable=true), Published February 22, 2024, p. 204, URL: (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56336&shareable=true).

²¹² Data Request OEIS-E-SVM_2025-PC-002, Question 2.8; Response to OEIS-SVM Data Request 2.8.

²¹³ Data Request OEIS-E-SVM_2025-PC-002, Question 2.8; attachment: “OEIS-SVM 2.8-1.xlsx.”

²¹⁴ Data Request OEIS-E-SVM_2025-PC-002, Question 2.8; Response to OEIS-SVM Data Request 2.8.

Finding – 8.2.3.4 Substation Defensible Space

PacifiCorp did not provide information consistent with the completion of work identified in this initiative. Therefore, Energy Safety concludes that initiative 8.2.3.4 Substation Defensible Space is deficient.

In its CAP response PacifiCorp must provide corrective actions describing how it plans to track substation defensible space inspections and maintenance in future performance years.

8.2.3.5 Vegetation and Fuels Management – High-Risk Species

The purpose of this initiative is to take actions “to reduce the ignition probability and wildfire consequence attributable to high-risk species of vegetation.”²¹⁵

Narrative Statements, Supporting Information, and Analysis

Statement 14

Statement: “Within the HFTD, pruning is performed to prevent vegetation from breaching a 4-foot minimum clearance within one year. This may require additional pruning for at-risk species with very fast growth rates. Pre-listers also identify discretionary removals of at-risk species to eliminate ignition risk and need for cyclical pruning.”²¹⁶

Supporting Information and Analysis: PacifiCorp explained that its off-cycle patrol inspections identify vegetation that has encroached upon or will encroach upon the 4-foot minimum clearance distance prior to the next scheduled work in the HFTD in addition to identification of hazard trees.²¹⁷ PacifiCorp provided an Excel file documenting the completed clearance work prescribed during patrol inspections of distribution lines.²¹⁸ Based on the information provided, there were a total of 537 discretionary tree removals, 123 reliability prunes, and 1,134 reliability removals in HFTD designated areas in 2024.²¹⁹ PacifiCorp explained that pruning or removal of at-risk species was not discretely tracked and was

²¹⁵ Office of Energy Infrastructure Safety, [2023-2025 Base Wildfire Mitigation Plan Technical Guidelines](#), Published December 2022, p. A-24, URL:

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53286&shareable=true>).

²¹⁶ PacifiCorp, [2023-2025 Final Wildfire Mitigation Plan Update R2](#), Published February 22, 2024, p. 205, URL: (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56336&shareable=true>).

²¹⁷ Data Request OEIS-E-SVM_2025-PC-001, Question 26; Response to OEIS-SVM Data Request 26.

²¹⁸ Data Request OEIS-E-SVM_2025-PC-001, Question 26; attachment: “OEIS SVM 26 CONF.xlxs.”

²¹⁹ Data Request OEIS-E-SVM_2025-PC-002, Question 2.9; Response to OEIS-SVM Data Request 2.9.

embedded within other work activities.²²⁰ Therefore, PacifiCorp did not provide information to demonstrate that it inspects and remediates high risk species.

Conclusion: PacifiCorp did not provide information consistent with the completion of work identified in this statement.

Finding – 8.2.3.5 High-Risk Species

PacifiCorp did not provide information consistent with the completion of work identified in 8.2.3.5 High-Risk Species. Therefore, Energy Safety concludes that initiative 8.2.3.5 High-Risk Species is deficient.

In its CAP response PacifiCorp must provide corrective actions to track inspections and mitigation work for high-risk species within its service territory.

8.2.3.6 Vegetation and Fuels Management – Fire Resilient Right-of-Ways

The purpose of this initiative is to take actions “to promote vegetation communications that are sustainable, fire-resilient, and compatible with the use of the land as an electrical corporation right-of-way.”²²¹

Narrative Statements, Supporting Information, and Analysis

Statement 15

Statement: “Pacific Power utilizes integrated vegetation management (IVM) best practices to manage vegetation in which undesirable vegetation is identified and selected control(s) are implemented, consistent with the American National Standards Institute guidance.”²²²

Supporting Information and Analysis: PacifiCorp explained that the American National Standards Institute identifies IVM best practices to include communications and stakeholder engagement, determination of tolerance and action levels, and treatment methods such as biological, chemical, cultural, prescribed fire, and physical methods.²²³ To support

²²⁰ Data Request OEIS-E-SVM_2025-PC-001, Question 26; Response to OEIS-SVM Data Request 26.

²²¹ Office of Energy Infrastructure Safety, [2023-2025 Base Wildfire Mitigation Plan Technical Guidelines](#), Published December 2022, p. A-24, URL: (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53286&shareable=true>).

²²² PacifiCorp, [2023-2025 Final Wildfire Mitigation Plan Update R2](#), Published February 22, 2024, p. 205, URL: (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56336&shareable=true>).

²²³ Data Request OEIS-E-SVM_2025-PC-002, Question 27; Response to OEIS-SVM Data Request 27.

PacifiCorp’s engagement in IVM best practices such as “determination of tolerance and action level,” PacifiCorp provided its “Transmission & Distribution Vegetation Management Program Standard Operating Procedures.”²²⁴ From this file, Section 6.1 Transmission Clearances presents “Action Thresholds”, which provide a ten-foot buffer from the minimum vegetation clearance distances (MVCD). The “Action Thresholds” are presented in Table 6.1 of PacifiCorp’s “Transmission & Distribution Vegetation Management Program Standard Operating Procedures.”²²⁵ PacifiCorp explained that these thresholds are designed to prevent encroachment upon the MVCD and are designed to be consistent with IVM guidelines.

Additionally, to support PacifiCorp’s engagement in IVM best practices such as “Communications and stakeholder engagement,” PacifiCorp provided an example of correspondence between PacifiCorp and the Forest Service regarding development of an Operations and Maintenance Plan (O&M Plan) in 2024.²²⁶ PacifiCorp explained that the O&M Plan includes descriptions of vegetation management practices, including IVM methods such as herbicide application.²²⁷

PacifiCorp also explained that IVM methods and best practices are embedded within vegetation maintenance conducted on both distribution and transmission lines, including physical/manual control and herbicide. This work was assessed under section 8.2.3.2 Clearance.

To support PacifiCorp’s engagement in IVM best practices such as “herbicide application,” PacifiCorp provided an Excel file that contains herbicide application information associated with work conducted as a result of detail and patrol inspections of distribution and transmission lines.²²⁸ Based on this file, a total of 629,5239 gallons of herbicide were applied across 1,147 total applications.

Conclusion: PacifiCorp provided information consistent with the completion of work identified in this statement.

Statement 16

Statement: “In addition, Pacific Power promotes right tree in right place or small trees for small places concepts with customers coupled with our tree replacement voucher program. Tree replacement vouchers may be provided to customers on a case-by-case basis to offset removal of incompatible species within or adjacent to the right-of-way. Pacific Power

²²⁴ Data Request OEIS-E-SVM_2025-PC-002, Question 2.10; attachment: “OEIS SVM Set 2 Data Request 10-1.pdf.”

²²⁵ Data Request OEIS-E-SVM_2025-PC-002, Question 2.10; attachment: “OEIS SVM Set 2 Data Request 10-1.pdf.”

²²⁶ Data Request OEIS-E-SVM_2025-PC-002, Question 2.10; attachment: “OEIS SVM Set 2 Data Request 10-2.pdf.”

²²⁷ Data Request OEIS-E-SVM_2025-PC-002, Question 2.10; Response to OEIS-SVM Data Request 2.10.

²²⁸ Data Request OEIS-E-SVM_2025-PC-002, Question 2.10; attachment: “OEIS SVM Set 2 Data Request 10-5.xlsx.”

provides information to customers regarding vegetation that is compatible with utility rights-of-way and coordinates with communities through Arbor Day functions or other educational outreach opportunities.²²⁹

Supporting Information and Analysis: PacifiCorp explained that generally, replacement vouchers are used to offset discretionary removals. It is at the discretion of the inspector and/or PacifiCorp forester to identify when a voucher should be used. Vouchers could be used to help facilitate negotiation and obtain approval/consent from the landowner to remove trees (fell trees).²³⁰

PacifiCorp provided an Excel file listing the tree coupons/vouchers that were provided to customers and stakeholders in 2024.²³¹ From this file, when filtering for “CA” and “California,” there was a total of 61 reimbursement coupons provided in California throughout 2024. All 61 reimbursements were categorized as “Coupon_Reimbursement.” PacifiCorp explained that this category generally represents coupons that were provided to landowners to offset removal of incompatible species within or adjacent to the right-of-way.²³²

PacifiCorp also provided examples of documentation available to customers including “Small trees for small places” which includes information on planting the right tree in the right place, pruning trees in proximity to distribution lines, choosing a tree, examples of tree species to use adjacent to power lines, how to plant a tree, and other resources.²³³ Another example provided was “Trees and power lines” which also provides information on pruning near powerlines.²³⁴ PacifiCorp explained that these documents and additional information is available to customers via pacificpower.net/outages-safety/vegetation-management.html ([Tree Pruning & Planting](#)).²³⁵ The brochure is generally available as a handout that may be provided during meetings with communities, agencies, etc.²³⁶ PacifiCorp also stated that it does not track distribution of handouts.²³⁷

Conclusion: PacifiCorp provided information consistent with the completion of work identified in this statement.

²²⁹ PacifiCorp, [2023-2025 Final Wildfire Mitigation Plan Update R2](#), Published February 22, 2024, p. 205, URL: (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56336&shareable=true>).

²³⁰ Data Request OEIS-E-SVM_2025-PC-002, Question 2.11; Response to OEIS-SVM Data Request 2.11.

²³¹ Data Request OEIS-E-SVM_2025-PC-001, Question 28; attachment “OEIS SVM 28-1.xlsx.”

²³² Data Request OEIS-E-SVM_2025-PC-002, Question 2.11; Response to OEIS-SVM Data Request 2.11.

²³³ Data Request OEIS-E-SVM_2025-PC-001, Question 28; attachment “OEIS SVM 28-2.pdf.”

²³⁴ Data Request OEIS-E-SVM_2025-PC-001, Question 28; attachment “OEIS SVM 28-3.pdf.”

²³⁵ Data Request OEIS-E-SVM_2025-PC-002, Question 2.11; Response to OEIS SVM Data Request 2.11.

²³⁶ Data Request OEIS-E-SVM_2025-PC-002, Question 2.11; Response to OEIS SVM Data Request 2.11.

²³⁷ Data Request OEIS-E-SVM_2025-PC-002, Question 2.11; Response to OEIS SVM Data Request 2.11.

Finding – 8.2.3.6 Fire Resilient Right-of-Ways

PacifiCorp provided information consistent with the completion of work identified in this initiative. Therefore, Energy Safety concludes that initiative 8.2.3.6 Fire Resilient Right-of-Ways.

8.2.3.7 Vegetation and Fuels Management –Emergency Response of Vegetation Management

The purpose of this initiative is the “planning and execution of vegetation activities in response to emergency situations including weather conditions that indicate an elevated fire threat and post-wildfire service restoration.”²³⁸

Narrative Statements, Supporting Information, and Analysis

Statement 17

Statement: “Pacific Power has developed daily weather briefings that provide weather forecast information as a tool for management/response-based decision making. Based on these weather forecasts and at times of elevated risk, vegetation management actions may be taken, including targeted patrols to identify and address potential ignition risks due to vegetation and inform decision making (including PSPS events). These patrols may be performed throughout the weather event and/or [public safety power shut-off PSPS event and are initiated and prioritized based on risk and situational awareness.”²³⁹

Supporting Information and Analysis: PacifiCorp explained that when it identifies potential for a PSPS, it conducts inspections, including identification of vegetation conditions.²⁴⁰ Vegetation conditions identified are then provided to the vegetation management department to be reviewed and mitigated.

PacifiCorp stated that it did not experience any public safety power shut-off events or weather conditions that triggered targeted patrols conducted by vegetation management.²⁴¹ Therefore, completion of work associated with this statement was not assessed in performance year 2024.

²³⁸ Office of Energy Infrastructure Safety, [2023-2025 Base Wildfire Mitigation Plan Technical Guidelines](#), Published December 2022, p. A-24, URL:

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53286&shareable=true>).

²³⁹ PacifiCorp, [2023-2025 Final Wildfire Mitigation Plan Update R2](#), Published February 22, 2024, p. 206, URL:

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56336&shareable=true>).

²⁴⁰ Data Request OEIS-E-SVM_2025-PC-001, Question 29; Response to OEIS-SVM Data Request 2.12.

²⁴¹ Data Request OEIS-E-SVM_2025-PC-001, Question 29; Response to OEIS-SVM Data Request 29.

Conclusion: The work described in this statement was not applicable in performance year 2024 and was therefore not evaluated.

Statement 18

Statement: “Regarding response to wildfires, Pacific Power foresters and/or vegetation management contractors patrol wildfire-impacted areas adjacent to electrical infrastructure to identify trees impacted by fire within strike distance of electrical infrastructure, determine risk, and determine strategy for mitigating the identified risk. Trees that pose an imminent risk are topped or felled to eliminate the risk as soon as practicable. Depending on the risk identified and considering other factors such as land ownership and environmental concerns, other mitigation efforts to address remaining fire-impacted trees may occur.”²⁴²

Supporting Information and Analysis: While PacifiCorp stated that its vegetation management did not experience new wildfire response actions (inspection and mitigation) of fire impacted trees in 2024, and it was involved in the cleanup/debris management of trees that were felled in 2023 in response to fires that occurred in 2023. Additionally, in response to the Shelley Fire in 2024, vegetation management crews supported asset protection efforts such as pole brushing, spraying, or wrapping with fire retardant materials.²⁴³

Conclusion: PacifiCorp provided information consistent with the completion of work identified in this statement.

Finding – 8.2.3.7 Emergency Response of Vegetation Management

PacifiCorp provided information consistent with the completion of work identified in 8.2.3.7 Emergency Response of Vegetation Management. Therefore, Energy Safety concludes initiative 8.2.3.7 Emergency Response of Vegetation Management is complete.

²⁴² PacifiCorp, [2023-2025 Final Wildfire Mitigation Plan Update R2](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56336&shareable=true), Published February 22, 2024, p. 206, URL: (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56336&shareable=true).

²⁴³ Data Request OEIS-E-SVM_2025-PC-001, Question 29; Response to OEIS-SVM Data Request 2.13.

8.2.4 Vegetation Management Enterprise System

The purpose of this initiative is the “[o]peration of and support for centralized vegetation management and inspection enterprise system(s) updated based upon inspection results and activities such as hardening, maintenance, and remedial work.”²⁴⁴

Narrative Statements, Supporting Information, and Analysis

Statement 19

Statement: “Pacific Power seeks opportunities to refine the MDMS [mobile data management software] data collection process through creating new forms or updating existing forms to capture additional data fields as data gaps are identified to allow for informed vegetation management program decision making. Pacific Power has updated several forms including the inventory, work complete, adder request, audit exception, tree coupon (voucher) and property owner refusal to enhance data collection and tracking capabilities.”²⁴⁵

Supporting Information and Analysis: PacifiCorp stated that the MDMS is a data management tool used to collect data in the field regarding identified and completed vegetation management actions.²⁴⁶ Also, revisions to the MDMS generally arise when a need is identified to collect additional information; data collection forms are then revised as warranted. However, not all revisions are formally logged and tracked. According to PacifiCorp, no notable revisions to data collection forms were identified in 2024.²⁴⁷ Therefore, work associated with this statement was not assessed in 2024.

Conclusion: The work described in this statement was not applicable in performance year 2024 and was therefore not evaluated.

Finding – 8.2.4 Vegetation Management Enterprise System

No notable work was required during performance year 2024. Therefore, Energy Safety concludes initiative 8.2.4 Vegetation management Enterprise System is complete.

²⁴⁴ Office of Energy Infrastructure Safety, [2023-2025 Base Wildfire Mitigation Plan Technical Guidelines](#), Published December 2022, p. A-24, URL:

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53286&shareable=true>).

²⁴⁵ PacifiCorp, [2023-2025 Final Wildfire Mitigation Plan Update R2](#), Published February 22, 2024, p. 207, URL: (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56336&shareable=true>).

²⁴⁶ Data Request OEIS-E-SVM_2025-PC-002, Question 2.14; Response to OEIS-SVM Data Request 2.14.

²⁴⁷ Data Request OEIS-E-SVM_2025-PC-001, Question 29; Response to OEIS-SVM Data Request 31.

8.2.5 Quality Assurance and Quality Control

The purpose of this initiative is the “[e]stablishment and function of audit process to manage and confirm work completed by employees or contractors, including packaging QA/QC information for input to decision-making and related integrated workforce management processes.”²⁴⁸

Quantitative Target or Commitment, Supporting Information, and Analysis

PacifiCorp included the following target in its 2023-2025 WMP.²⁴⁹ For ease of comparison, the WMP target and work completed are summarized below:

Initiative Activity	PacifiCorp’s 2024 Target	Actual Completed in 2024
QA/QC – Distribution (Patrol)	865 line miles	1,037 line miles
QA/QC – Post-Audits Transmission (Patrol)	99 line miles	116 line miles

Supporting Information and Analysis:

QA/QC - Distribution (Patrol): PacifiCorp provided its 2024 miles tracker which recorded post-audits completed along PacifiCorp’s distribution lines in 2024.²⁵⁰ PacifiCorp completed post-audits along 1,037 distribution line miles and achieved its post-audit targets along distribution lines (VM-11) in 2024.

QA/QC - Transmission (Patrol): PacifiCorp provided its 2024 miles tracker which recorded post-audits completed along PacifiCorp’s transmission lines in 2024.²⁵¹ PacifiCorp completed post-audits along 116 transmission line miles and achieved its post-audit targets along transmission lines (VM-11) in 2024.

Conclusion: PacifiCorp provided information consistent with the completion of work identified in these targets.

²⁴⁸ Office of Energy Infrastructure Safety, [2023-2025 Base Wildfire Mitigation Plan Technical Guidelines](#), Published December 2022, p. A-24, URL:

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53286&shareable=true>).

²⁴⁹ PacifiCorp, [2023-2025 Final Wildfire Mitigation Plan Update R2](#), Published February 22, 2024, pp. 185-187, URL:

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56336&shareable=true>).

²⁵⁰ Data Request OEIS-E-SVM_2025-PC-001, Question 6; attachment: “OEIS SVM 6.xlsx.”

²⁵¹ Data Request OEIS-E-SVM_2025-PC-001, Question 7; attachment: “OEIS SVM 7.”

Narrative Statements, Supporting Information, and Analysis

Statement 20

Statement: “Post-audits are completed annually and include review of routine maintenance (work identified during detailed inspections) and additional work completed annually within the HFTD (work identified during patrol inspections).”²⁵²

Supporting Information and Analysis: PacifiCorp provided a line miles tracker used to track QA/QC audit progress across distribution and transmission lines.²⁵³ Based on this file, 100% of scheduled distribution miles were audited and 86% of scheduled transmission miles were audited in 2024.

PacifiCorp also provided a map of distribution and transmission line QA/QC audits conducted across California in 2024.²⁵⁴ The map highlighted the distribution and transmission lines that were audited and their relationship to HFTD. This document provided visual confirmation that distribution lines were audited across HFTD 2, 3, and non-HFTD designated areas around Crescent City, Yreka, MT Shasta, and Alturas, California. In contrast, transmission lines were audited in HFTD 2 and Non-HFTD designated areas around Crescent City, Yreka, Tulelake, and Alturas, CA.

Conclusion: PacifiCorp provided information consistent with the completion of work identified in this statement.

Statement 21

Statement: “The staff conducting post-audits record work exceptions (inconsistencies with Pacific Power specifications or work missed) using the MDMS. The audit exceptions are then visible to the vegetation management contractor within the MDMS and assigned to that contractor, who remains responsible for the work, including any corrective action.”²⁵⁵

Supporting Information and Analysis: PacifiCorp provided several files from its MDMS system which document and track the clearance work completed in response to QA/QC audits (work exceptions).

²⁵² PacifiCorp, [2023-2025 Final Wildfire Mitigation Plan Update R2](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56336&shareable=true), Published February 22, 2024, p. 207, URL: (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56336&shareable=true).

²⁵³ Data Request OEIS-E-SVM_2025-PC-002, Question 2.15; attachment: “OEIS SVM Set 2 Data Request 15-2.pdf.”

²⁵⁴ Data Request OEIS-E-SVM_2025-PC-002, Question 2.15; attachment: “OEIS SVM Set 2 Data Request 15-1.xlxs.”

²⁵⁵ PacifiCorp, [2023-2025 Final Wildfire Mitigation Plan Update R2](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56336&shareable=true), Published February 22, 2024, p. 208, URL: (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56336&shareable=true).

First, PacifiCorp provided an Audit Exceptions Report documenting all work exceptions (work completed incorrectly or missed work) identified during QA/QC audits in California in 2024.²⁵⁶ From this file, rows without a Tracking ID were filtered out because PacifiCorp explained that they are not part of the QA/QC initiative.²⁵⁷ From this file, a total of 905 work exceptions were identified across six different districts during QA/QC audits in California in 2024.

All work exceptions identified during QA/QC audits are summarized below:

Work Code	Description	Work Exceptions	
		Count	Percentage
DST	QA/QC audits of clearance work completed on detailed inspections of distribution lines	496	(55%)
MHS	QA/QC audits of clearance work completed on detailed inspections of main grid transmission lines	0	(0%)
THS	QA/QC audits of clearance work completed on detailed inspections of local transmission lines	0	(0%)
FMD	QA/QC audits of clearance work completed on patrol inspections of distribution lines	400	(44%)
FMT	QA/QC audits of clearance work completed on patrol inspections of transmission lines	9	(1%)
All codes	Total QA/QC audit exceptions	905	

These same work exceptions identified during QA/QC audits are summarized by HFTD designation below:

Line Type	HFTD 2		HFTD 3		Non-HFTD		Total Work Exceptions
	Count	Percentage	Count	Percentage	Count	Percentage	
Distribution	574	(64%)	53	(6%)	269	(30%)	896
Transmission	8	(89%)	0	(0%)	1	(11%)	9
Total:	582	(64%)	53	(6%)	270	(30%)	905

This information shows that a majority of work exceptions are for work on distribution lines (99%) and work in HFTD (70%). The prevalence of work exceptions in HFTD is concerning because it suggests that the initial mitigation work did not sufficiently manage risk in these areas at highest risk of wildfire. Of the total number of work exceptions, 58% were billable, meaning that mitigation work that was not initially prescribed was later prescribed as a result of the QA/QC audit process, and 42% were non-billable, meaning that initially prescribed work was not appropriately completed and required rework. The documentation

²⁵⁶ Data Request OEIS-E-SVM_2025-PC-001, Question 32; attachment: "OEIS SVM 32 CONF.xlsx."

²⁵⁷ Data Request OEIS-E-SVM_2025-PC-002, Question 2.15; Response to OEIS-SVM Data Request 2.15.

demonstrated that PacifiCorp's' QA/QC program was working as intended, catching incomplete and inaccurate work. The high percentage of billable work exceptions also demonstrates that there are areas for improvement in its operating procedures to ensure mitigation efforts are initially completed to expectation.

Additionally, PacifiCorp provided a Work Complete Report listing mitigation work prescribed and completed along distribution²⁵⁸ and transmission²⁵⁹ lines. These files included work completion associated with audit exceptions as well as work completed associated with the prescriptions assigned during detailed and patrol inspections, PacifiCorp stated that “[g]enerally, the map object ID in the PpAuditException report (Column AR of Attachment SVM_32_PpAuditException_2024) will correspond to the map object ID in the work complete report (Column AK), tying together the audit exception and corrective work conducted in response to the audit exception.”²⁶⁰ Of the 982 work exceptions identified during the QA/QC process 813 were documented in the work completion file and 168 did not have a corresponding Map Object ID in the work completion file and therefore work completion was not verified for these exceptions. Therefore, PacifiCorp did not provide verifiable evidence of plans to complete the remaining work exceptions.

Conclusion: PacifiCorp did not provide information consistent with the completion of work identified in this statement.

Finding – 8.2.5 Quality Assurance and Quality Control

PacifiCorp did not provide information consistent with the completion of work identified in this initiative. Therefore, Energy Safety concludes that initiative 8.2.5 Quality Assurance and Quality Control is deficient.

In its CAP response PacifiCorp must either provide additional documentation supporting completion associated with audit exceptions or provide a corrective action response describing how it will ensure the work is completed to expectation in future performance years.

²⁵⁸ Data Request OEIS-E-SVM_2025-PC-001, Question 33; attachment: “OEIS SVM 33-1 CONF.xlsx.”

²⁵⁹ Data Request OEIS-E-SVM_2025-PC-001, Question 33; attachment: “OEIS SVM 33-2 CONF.xlsx.”

²⁶⁰ Data Request OEIS-E-SVM_2025-PC-001, Question 33 response.

8.2.6 Open Work Orders

The purpose of this initiative is to take actions “to manage the electrical corporation’s open work orders resulting from inspections that prescribe vegetation management activities.”²⁶¹

Narrative Statements, Supporting Information, and Analysis

Statement 22

Statement: “Inspection on a circuit is generally initiated 1-6 weeks prior to the vegetation management corrective maintenance taking place. As the inspection is completed, the work is released to the vegetation management contractor to conduct the corrective maintenance.”²⁶²

Supporting Information and Analysis: PacifiCorp provided an Excel file of locations where corrective maintenance was prescribed during detailed and patrol inspections of distribution²⁶³ and transmission²⁶⁴ lines. The files have the inspection date, date the work was completed, time difference between both dates in days, location information, work code, contact type, work description, number of cycle busters addressed, and number of prunes and removals.

The work order completion timeframes are summarized below:

²⁶¹ Office of Energy Infrastructure Safety, [2023-2025 Base Wildfire Mitigation Plan Technical Guidelines](#), Published December 2022, p. A-24, URL:

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53286&shareable=true>).

²⁶² PacifiCorp, [2023-2025 Final Wildfire Mitigation Plan Update R2](#), Published February 22, 2024, p. 191, URL:

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56336&shareable=true>).

²⁶³ Data Request OEIS-E-SVM_2025-PC-002, Question 2.19; attachment: “OEIS SVM Set 2 Data Request 19-1.xlsx.”

²⁶⁴ Data Request OEIS-E-SVM_2025-PC-002, Question 2.19; attachment: “OEIS SVM Set 2 Data Request 20-1.xlsx.”

Line/ Inspection Type	Work order completed within 6 weeks after inspection		Work order completed more than 6 weeks after inspection		Total
Distribution Lines (Detailed Inspection)	3,117	(63%)	1,803	(37%)	4,920
Transmission Lines (Detailed Inspection)	245	(77%)	72	(23%)	317
Distribution Lines (Patrol Inspection)	1516	(55%)	1,217	(44%)	2,733
Transmission Lines (Patrol Inspection)	8	(17%)	39	(83%)	47
Total	4,886	(61%)	3,131	(39%)	8,017

The files indicate that 61% of all reported prescriptions along distribution and transmission lines were completed within 6 weeks, while 39% were completed more than 6 weeks after.

Energy Safety expects PacifiCorp to remediate all vegetation hazards within 6 weeks unless there are recorded constraints preventing this work from being complete. PacifiCorp did not provide documentation that the 39% delayed work was constrained. Therefore, Energy Safety concluded that PacifiCorp did not complete all work commitments in this statement.

Conclusion: PacifiCorp did not provide information consistent with the completion of work for this statement.

Statement 23

Statement: “In 2022, Pacific Power created a report that links forms (e.g., inventory and work complete) at a work location. In 2023, this report will be reviewed and modified to allow for tracking of open work locations (locations without a work complete form) to help drive completion of any open work locations prior to end of each calendar year.”²⁶⁵

Supporting Information and Analysis: PacifiCorp provided the Form Link report for distribution circuits listing the treatment dates, district name, circuit name, LRA designation, pole number, the number of poles cleared and treated, location, Form ID, and Map Object ID, and products used.²⁶⁶ Although PacifiCorp highlights circuit 8G103 in its response, as an example of an ongoing vegetation maintenance project in 2024, Energy Safety could not find

²⁶⁵ PacifiCorp, [2023-2025 Final Wildfire Mitigation Plan Update R2](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56336&shareable=true), Published February 22, 2024, p. 210, URL: (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56336&shareable=true).

²⁶⁶ Data Request OEIS-E-SVM_2025-PC-003, Question 3.2; attachment: “OEIS SVM 2.1.xlsx.”

information of this circuit in the referenced attachment.²⁶⁷ Additionally, this form would only provide work completed but would not link it to the inspection (open work order) inventory. Therefore, while this report could demonstrate that work was completed throughout 2024, it does not provide information on how PacifiCorp tracks open work order locations to help drive completion of any open work locations within the mitigation timeframe set in the WMP.

Additionally, PacifiCorp referenced attachment 2.2 to provide evidence of a Form Unit Link report for circuit 5G93 as an example a completed 2024 vegetation maintenance project.²⁶⁸ However, the referenced attachment is Contractor Release Form instead of a Form Unit Link report for Grid #5R167 from 2024. This form details the work required to be completed by the contractor along 33 miles of Grid #5R167 and does not include information linking inventory (open work orders) to the work completed. Therefore, this attachment was not evidence for completion of this statement.

PacifiCorp explained that it was implementing improvements to the Form Link system which included updates to improve user interface and readability, ability to filter/query data, and introduce automated features for visually identifying discrepancies (e.g., highlighting work locations orange that do not have all applicable forms attached and highlighting work locations yellow where a discrepancy is noted in the data between what is recorded on the inventory form and the work complete form).²⁶⁹ PacifiCorp stated that it also updated background formulas to reflect more accurate use of data forms, work units recorded in the forms, and workday calculations between inspection records and work complete data per location.²⁷⁰ PacifiCorp provided its user guide associated with the updated Form Link report.²⁷¹ The user guide provides guidance on how to generate the report and how it helps with tacking open work orders. The guide also explained that the attribute "Days Btw Insp & Work" calculates the number of workdays, between initial inspection form date and work complete form date by using background formulas such as "Inventory (INV) +Work Complete (WC) = Workdays Between INV - WC." This attribute could be used to substantiate work completion but was not included in Excel files PacifiCorp provided.

The Form Link improvements PacifiCorp described may improve work order management; however, PacifiCorp did not provide evidence that prescribed work orders were completed within the timeframe established in the WMP.

²⁶⁷ Data Request OEIS-E-SVM_2025-PC-003, Question 3.2; 1st Revised Response to OEIS-SVM Data Request 3.2.

²⁶⁸ Data Request OEIS-E-SVM_2025-PC-003, Question 3.2; Response to OEIS-SVM Data Request 3.2.

²⁶⁹ Data Request OEIS-E-SVM_2025-PC-003, Question 3.2; 1st Revised Response to OEIS-SVM Data Request 3.2.

²⁷⁰ Data Request OEIS-E-SVM_2025-PC-003, Question 3.2; 1st Revised Response to OEIS-SVM Data Request 3.2.

²⁷¹ Data Request OEIS-E-SVM_2025-PC-003, Question 3.2; attachment "Attach OEIS SVM 3.2 1st REVISED.xlsx."

Conclusion: PacifiCorp did not provide information consistent with the completion of work for this statement.

Finding – 8.2.6 Open Work Orders

PacifiCorp did not provide information consistent with the completion of work identified in this initiative. Therefore, Energy Safety concludes that initiative 8.2.6 Open Work Orders is deficient.

While PacifiCorp was able to provide documentation demonstrating that inspections and clearance work was completed, it did not provide sufficient evidence to demonstrate that its current work order tracking system supports the timely completion of associated work orders. Energy Safety detailed in its Decision on 2023-2025 WMP “Areas for Continued Improvement” that it required PacifiCorp to develop work prioritization methods that eliminate the imprecision of the “Red Dot” system and adequately communicate varying degrees of work priority identified during inspections.²⁷² While PacifiCorp did provide evidence of moving away from the “Red Dot” system towards a “yellow” and “orange” system as described in its Form Link report user guide²⁷³, the example Form Unit Link²⁷⁴ provided did not include evidence of this color system was implemented, did not link the inventory (open work orders) to work complete, and did not demonstrate how PacifiCorp prioritized work.

In its CAP, PacifiCorp must provide planned corrective actions to its work order tracking system to ensure vegetation mitigation is completed 1-6 weeks, as prescribed in the WMP, after inspection and that it tracks its open work orders to ensure timely completion of priority work.

8.2.7 Workforce Planning

The purpose of this initiative is that “[p]rograms... ensure that the electrical corporation has qualified vegetation management personnel and to ensure that both employees and contractors tasked with vegetation management responsibilities are adequately trained to perform relevant work.”²⁷⁵

²⁷² Decision on 2023-2025 WMP (February 2024), p. 62.

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56309&shareable=true>).

²⁷³ Data Request OEIS-E-SVM_2025-PC-003, Question 3.2; attachment “OEIS SVM 3.2 1st REVISED.xlsx.”

²⁷⁴ Data Request OEIS-E-SVM_2025-PC-003, Question 3.2; attachment: “OEIS SVM 2.1.xlsx.”

²⁷⁵ Office of Energy Infrastructure Safety, [2023-2025 Base Wildfire Mitigation Plan Technical Guidelines](#),

Published December 2022, p. A-24, URL:

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53286&shareable=true>).

Narrative Statements, Supporting Information, and Analysis

Statement 24

Statement: “Pacific Power requires that its utility foresters are certified arborists and certified utility specialists by the International Society of Arboriculture (ISA). Pacific Power is not directly responsible for the training of the vegetation management workforce, who are employees of an independent contractor, however, does provide annual environmental awareness training and conducts audits and crew visits, which may lead to discussions and opportunities for improvement.”²⁷⁶

Supporting Information and Analysis: PacifiCorp provided a list of their foresters who manage and/or conduct vegetation management activities in California.²⁷⁷ From this file, all six foresters have an ISA Arborist number, Utility Specialist number, TRAQ certification number, and meet the minimum years of experience required for each of their positions and three foresters also have herbicide license numbers.

PacifiCorp also provided a list of contractor vegetation management inspectors, also known as Forest Techs or Consulting Utility Foresters (CUFs) along with their ISA certification number, Utility Specialist Certification numbers, and herbicide license numbers. PacifiCorp explained that it is unable to provide information on their education, industry experience, nor contractor FTE minimum qualifications met because that information is maintained by the Forest Tech’s employer. Energy Safety notes that, while PacifiCorp’s WMP does not require it to train its contractor workforce directly, it is ultimately responsible for ensuring that it has a trained and fully qualified workforce managing its WMP commitments. Further, PacifiCorp must be able to provide evidence that its workforce is qualified to demonstrate that it met the objective of this initiative.

PacifiCorp also provided attendance rosters to avian, environmental program, and herbicide specifications training in 2024.^{278, 279} Training materials provided by PacifiCorp regarding avian/environmental awareness were also provided.²⁸⁰ PacifiCorp explained that the third-party training materials regarding herbicides are not available because vegetation maintenance contractor employed a third-party herbicide contractor to provide herbicide

²⁷⁶ PacifiCorp, [2023-2025 Final Wildfire Mitigation Plan Update R2](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56336&shareable=true), Published February 22, 2024, p. 211, URL: (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56336&shareable=true).

²⁷⁷ Data Request OEIS-E-SVM_2025-PC-002, Question 2.17; attachment: “OEIS SVM 34_revised.xlsx.”

²⁷⁸ Data Request OEIS-E-SVM_2025-PC-001, Question 35; attachment: “OEIS SVM 35-1.pdf.”

²⁷⁹ Data Request OEIS-E-SVM_2025-PC-001, Question 35; attachment: “OEIS SVM 35-2.pdf.”

²⁸⁰ Data Request OEIS-E-SVM_2025-PC-002, Question 2.18; attachment: “OEIS SVM 2.18.”

training in conjunction with the avian/environmental awareness training that PacifiCorp staff delivered.²⁸¹

Conclusion: PacifiCorp did not provide information consistent with the completion of work identified in this statement.

Finding – 8.2.7 Workforce Planning

PacifiCorp did not provide information consistent with the completion of work identified in 8.2.7 Workforce Planning. Therefore, Energy Safety concludes that initiative 8.2.7 Workforce Planning is deficient.

In its CAP, PacifiCorp must either provide documentation demonstrating that its workforce is fully trained and qualified or provide corrective actions to demonstrate that it will track this information in future years.

²⁸¹ Data Request OEIS-E-SVM_2025-PC-002, Question 2.18; Response to OEIS-SVM Data Request 2.18.



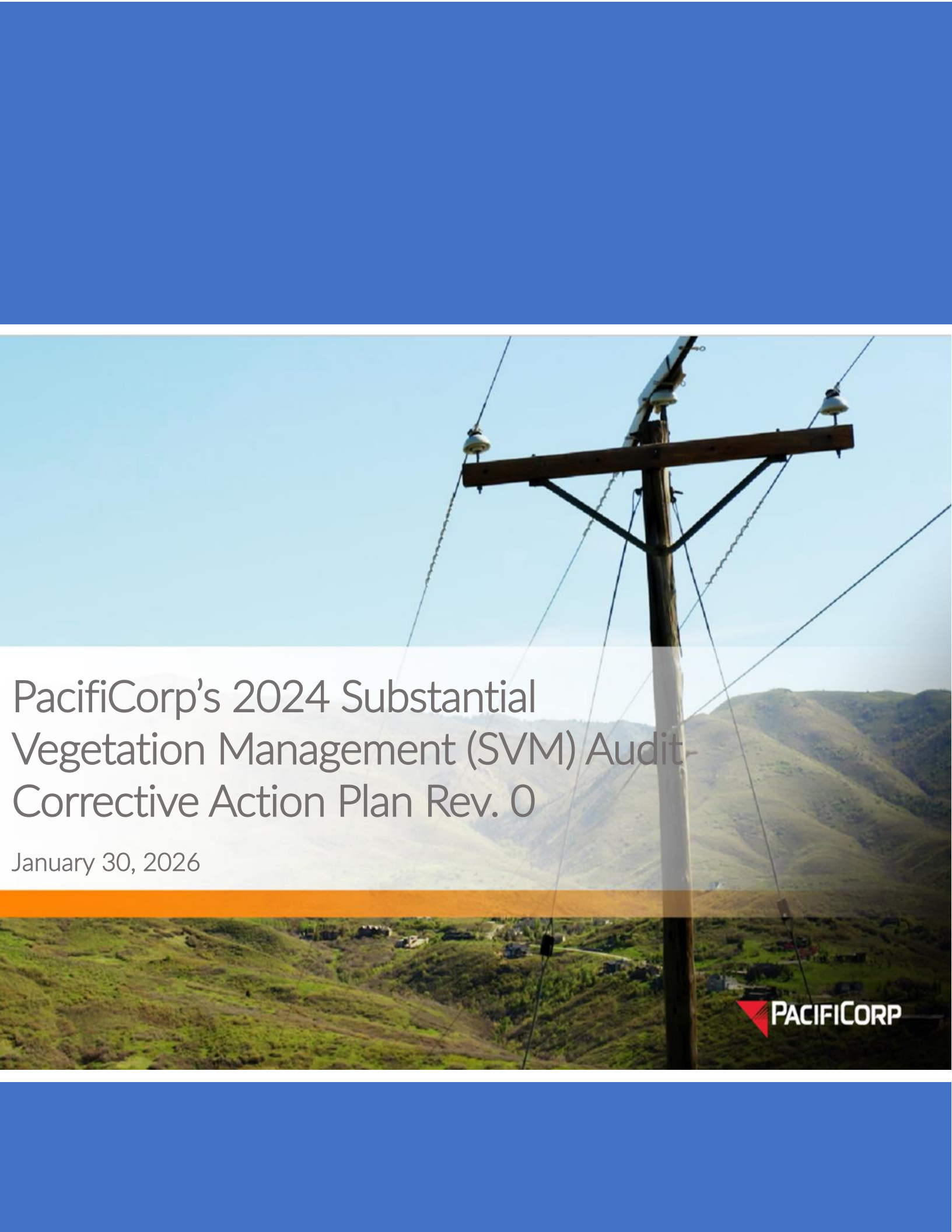
APPENDIX 2. PacifiCorp 2024 Corrective Action Plan



APPENDIX DESCRIPTION

PacifiCorp submitted its corrective action plan to Energy Safety on January 30, 2026.

This appendix reproduces that CAP response in its entirety.



PacifiCorp's 2024 Substantial Vegetation Management (SVM) Audit Corrective Action Plan Rev. 0

January 30, 2026



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INTRODUCTION

In compliance with the Office of Energy Infrastructure Safety’s (Energy Safety) December 19, 2025, Audit Report on PacifiCorp’s Substantial Vegetation Management (SVM) Work in 2024 (2024 SVM Audit Report), PacifiCorp submits this Substantial Vegetation Management Audit Response and Corrective Action Plan.

1 SVM Findings

Energy Safety’s 2024 SVM Audit Report determined that based on their analysis of relevant data provided to Energy Safety by PacifiCorp, Energy Safety was unable to substantiate completion of all vegetation management work performed by the Company for the 2024 performance year.

The nine commitments Energy Safety deemed deficient are:

Table 1 : Summary of Findings

Programmatic Area	Analysis/Information	Corrective Actions/Findings
8.2.2 Vegetation Management Inspections	PacifiCorp did not provide information consistent with the completion of all work identified in 8.2.2.1 detailed inspections and management practices for vegetation clearances around distribution electrical lines and equipment and 8.2.2.3 patrol inspections of vegetation around distribution electric lines and equipment.	PacifiCorp must provide its definition of circuit and line miles as well as provide a conversion tool that would allow Energy Safety to determine that the number of circuit miles in its distribution detailed and patrol inspections targets were met in 2024.
8.2.2.1 Detailed Inspection – Distribution (VM-01)	875 line miles completed of the 874 circuit miles targeted for Detailed Inspection – Distribution. PacifiCorp did not provide information consistent with the completion of work for its detailed inspection target for its distribution lines.	PacifiCorp must provide information consistent with the completion of work for its detailed inspection target for its distribution lines.
8.2.2.1 Detailed Inspection – Transmission Schedule	Annual inspections were planned along 3 main grid transmission (MHS) lines from 2022-2024, and at least once every three years along its 24 local transmission (THS) lines. PacifiCorp only submitted evidence that detailed inspections were completed along one THS line and the work plan provided by PacifiCorp does not provide sufficient evidence to demonstrate that the remaining 3 MHS and 23 THS line inspections were completed as planned.	PacifiCorp must provide information consistent with the completion of work for this statement associated with Detailed Inspections – Transmission.

Programmatic Area	Analysis/Information	Corrective Actions/Findings
8.2.2.2 Patrol Inspections – Distribution (VM-03)	1,035 line miles completed of the 865 circuit miles targeted for Patrol Inspection – Distribution. PacifiCorp did not provide information consistent with the completion of work for its patrol inspection target for its distribution lines.	PacifiCorp must provide information consistent with the completion of work for its patrol inspection target for its distribution lines.
8.2.3.1.1 Wood and Slash Management	PacifiCorp did not provide sufficient evidence to demonstrate that wood and slash were properly managed at all work sites.	PacifiCorp must provide additional documentation to support that wood and slash was properly managed at all of its work sites or provide corrective actions addressing the deficiency.
8.2.3.1.2 Pole Clearing (VM-05)	1,033 poles brushed in local responsibility area (LRA) high fire threat district (HFTD) areas of the targeted 3,126 poles brushed in LRA HFTD areas.	PacifiCorp must either provide additional documentation that the pole clearing commitment in LRA HFTD was completed or provide corrective actions which will ensure the work is completed in future compliance years.
8.2.3.2 Pruning Beyond Minimum Required Clearances (Increased distances based on tree growth rate)	While PacifiCorp was able to provide data which demonstrated that clearance work was completed, PacifiCorp explained that it does not record growth rates nor clearance distance achieved at time of pruning.	PacifiCorp must provide corrective actions it plans to implement to track enhanced clearances-based species' growth rates.
8.2.3.2 Pruning Beyond Minimum Required Clearance (Increased clearance distances based on tree physical structure)	PacifiCorp was unable to provide documentation to demonstrate that natural target pruning was completed as a method to prune vegetation beyond minimum required clearances.	PacifiCorp must provide corrective actions it plans to implement to track enhanced clearances-based trees physical structure.
8.2.3.4 Substation Defensible Space	<p>PacifiCorp was unable to provide documentation demonstrating that lines connecting to a substation were inspected and that vegetation hazard identifications took place. PacifiCorp explained that reviewing vegetation around substations was part of detailed and patrol inspections, and that PacifiCorp does not track inspection of substation perimeters.</p> <p>Additionally, PacifiCorp referenced a weed abatement tracker detailing the dates substations were sprayed and sample weed abatement daily reports from Substation Operations. However, PacifiCorp did not provide this file to Energy Safety. Therefore, PacifiCorp did not provide sufficient evidence it met the objective of this initiative to reduce probability of wildfire ignitions due to contact with substation equipment.</p>	PacifiCorp must provide corrective actions describing how it plans to track substation defensible space inspections and maintenance in future performance years.
8.2.3.5 High-Risk Species	PacifiCorp explained that pruning or removal of at-risk species was not discretely tracked and was embedded within other work activities. Therefore, PacifiCorp did not provide information to demonstrate that it inspects and remediates high-risk species.	PacifiCorp must provide corrective actions to track inspections and mitigation work for high-risk species within its service territory.

Programmatic Area	Analysis/Information	Corrective Actions/Findings
8.2.5 Corrective Actions (VM-11)	Of the 982 work exceptions identified during the QA/QC process in the work completion file, 813 were documented and 168 did not have a Map Object ID, therefore work completion was not verified for these exceptions.	PacifiCorp must either provide additional documentation supporting completion associated with audit exceptions or provide a corrective action response describing how it will ensure the work is completed to expectation in future.
8.2.6 Vegetation Work	61% of all reported prescriptions along distribution and transmission lines were completed within 6 weeks, while 39% were completed more than 6 weeks after. PacifiCorp is expected to remediate all vegetation hazards within 6 weeks unless there are recorded constraints preventing this work from being complete. PacifiCorp did not provide documentation that the 39% delayed work was constrained.	PacifiCorp must provide planned corrective actions to its work order tracking system to ensure vegetation mitigation is completed in 1-6 weeks after inspection.
8.2.6 MDMS System 8.2.6 Open Work Locations	<p>While PacifiCorp was able to provide documentation demonstrating that inspections and clearance work was completed, it did not provide sufficient evidence to demonstrate that its current work order tracking system supports the timely completion of associated work orders.</p> <p>While PacifiCorp did provide evidence of moving away from the “Red Dot” system towards a “yellow” and “orange” system as described in its Form Unit Link report user guide, the example Form Unit Link provided did not include evidence the color system was implemented, did not link the inventory (open work orders) to work complete, and did not demonstrate how PacifiCorp prioritized work.</p>	<p>PacifiCorp must provide evidence to demonstrate that its current work order tracking system supports the timely completion of associated work orders.</p> <p>PacifiCorp must provide documentation of how the color system has been implemented through Form Unit Link or provide planned corrective actions for how it tracks open work orders to ensure timely completion of priority work.</p>
8.2.7 Forester Certification and Training	While PacifiCorp’s WMP does not require it to train its contractor workforce directly, it is ultimately responsible for ensuring that it has a trained and fully qualified workforce managing its WMP commitments.	PacifiCorp must either provide documentation demonstrating that its workforce is fully trained and qualified or provide corrective actions to demonstrate that it will track this information in future years.

2 PacifiCorp’s Corrective Actions

Table 2 : Corrective Action Plans/Response

Programmatic Area/ Corrective Action #	PacifiCorp’s Response	Milestone / Delivery Date
8.2.2 Vegetation Management Inspections	<p>With respect to the 2024¹ vegetation management initiatives, PacifiCorp applies the following units of measure for the audit period:</p> <ul style="list-style-type: none"> • Circuit miles - The total length in miles of separate circuits regardless of the number of conductors used per circuit. • Line miles - The number of miles of transmission and/or distribution line differs from circuit miles because individual circuits, such as the two circuits of a double circuit line, are not counted separately in circuit miles but are counted as separate total miles of line. <p>For 2024 distribution inspection initiatives VM-01 (Detailed Inspections) and VM-03 (Patrol Inspections), PacifiCorp previously clarified to Energy Safety² that in Attachment OEIS SVM 8-1,³ the column header “Line” denotes “Circuit” and the field “Miles” denotes “Circuit Miles.” Therefore, the “miles” reported for VM-01 and VM-03 in 2024 represent circuit-mile values; a separate unit conversion tool is not required for these initiatives.</p> <p>PacifiCorp’s 2026-2028 Wildfire Mitigation Plan (WMP)⁴ uses the following definitions consistent with Energy Safety guidelines:</p> <ul style="list-style-type: none"> • Circuit miles - The total length in miles of separate circuits regardless of the number of conductors used per circuit (i.e., different phases). • Line miles - The number of miles of transmission and/or distribution conductors, including the length of each phase and parallel conductor segment. <p>Beginning in the 2026 reporting year, PacifiCorp will apply these definitions in all filings and supporting documentation, such as table headings and field names explicitly reflecting the unit of measure (e.g., “Circuit Miles” for distribution inspection initiatives) consistent with the units provided in the WMP, and maintain consistency between labels and underlying data. These changes do not alter the 2024 results reported above.</p>	End of First Quarter 2026

¹ PacifiCorp, 2023-2025 Wildfire Mitigation Plan Update R2, Published February 22, 2024, pp. 333,336

² Data Request OEIS-E-SVM_2025-PC-002; Question 2.4; attachment “OEIS-SVM 2.4.docx.”

³ Data Request OEIS-E-SVM_2025-PC-001; Question 8; attachment: “OEIS SVM 8-1.xlsx.”

⁴ PacifiCorp, 2026-2028 Wildfire Mitigation Plan Version R1, Published November 26, 2025, pp. 472, 478

Programmatic Area/ Corrective Action #	PacifiCorp's Response	Milestone / Delivery Date
8.2.2.1 Detailed Inspection – Distribution (VM-01)	<p>PacifiCorp clarifies that for the 2024 audit period, the detailed inspection tracking and work planning for distribution were conducted at the circuit level. In the applicable 2024 trackers,⁵ the fields labeled “Line” and “Miles” were used to denote “Circuit” and “Circuit Miles,” respectively, consistent with PacifiCorp’s prior clarification to Energy Safety on usage of “Line” and “Miles” in vegetation management trackers.⁶</p> <p>PacifiCorp’s 2024 work plan scheduled detailed inspections for 875 distribution circuit miles (VM-01). Inspection records confirm completion of all 875 miles, thereby exceeding the VM-01 target of 874 circuit miles by one circuit mile. This clarification addresses the unit of measure concern noted in the audit and confirms completion of the VM-01 detailed-inspection target for 2024.</p> <p>Beginning in the 2026 reporting year, PacifiCorp will ensure that in filings and supporting documentation, such as table headings and field names explicitly reflect the unit of measure (e.g., “Circuit Miles” for distribution inspection initiatives) consistent with the units provided in the WMP and maintain consistency between labels and underlying data. These changes do not alter the 2024 results reported above.</p>	End of First Quarter 2026
8.2.2.1 Detailed Inspection – Transmission Schedule	<p>PacifiCorp’s transmission vegetation management program schedules detailed inspections for all Main Grid Transmission (MHS) lines annually and for all Local Transmission (THS) lines at least once every three years, consistent with the 2023–2025 WMP.⁷</p> <p>To substantiate completion for the 2022–2024 period, PacifiCorp references the file SVM_11_Work_Plan⁸ previously provided as OEIS-E-SVM_2025-PC-001, Question 11, attachment “OEIS SVM 11.xlsx.” This workbook lists each MHS and THS line, its classification, and the year(s) for which detailed inspections were planned and recorded.</p> <p>SVM_11_Work_Plan lists the three MHS lines and the twenty-four THS (local transmission) lines and identifies their inspection years within 2022–2024, demonstrating that the MHS lines were scheduled annually and the THS lines were scheduled at least once during the 2022–2024 period, consistent with the schedule.</p>	N/A

⁵ Data Request OEIS-E-SVM_2025-PC-001, Question 2; attachment: “OEIS SVM 2.xlsx.”

⁶ Data Request OEIS-E-SVM_2025-PC-002; Question 2.4; attachment “OEIS-SVM 2.4.docx.”

⁷ PacifiCorp, 2023-2025 Wildfire Mitigation Plan Update R2, Published February 22, 2024, pp. 195

⁸ Data Request OEIS-E-SVM_2025-PC-001, Question 11; attachment: “OEIS SVM 11.xlsx.”

Programmatic Area/ Corrective Action #	PacifiCorp's Response	Milestone / Delivery Date
8.2.2.2 Patrol Inspections – Distribution (VM-03)	<p>PacifiCorp clarifies that, for the 2024 audit period, distribution patrol inspections were planned and tracked at the circuit level. In the applicable 2024 tracker⁹ (OEIS SVM 4), the column header “Line” denotes “Circuit” and the field “Miles” denotes “Circuit Miles,” consistent with PacifiCorp’s prior clarification to Energy Safety (see PacifiCorp’s response¹⁰ to OEIS-E-SVM_2025-PC-002, Question 2.4¹¹). In the F Code History tab of OEIS SVM 4, Column I represents scheduled circuit miles and Column FG represents inspected circuit miles.</p> <p>For 2024, the work plan and inspection records show 1,035.48 distribution circuit miles for patrol inspections (FIN), which aligns with Attachment OEIS SVM 4. Against the VM-03 target of 865 circuit miles, PacifiCorp therefore completed 1,035.48 circuit miles and exceeded the target.</p> <p>Beginning in the 2026 reporting year, PacifiCorp will ensure that in filings and supporting documentation, such as table headings and field names explicitly reflect the unit of measure (e.g., “Circuit Miles” for distribution inspection initiatives) consistent with the units provided in the WMP and maintain consistency between labels and underlying data. These changes do not alter the 2024 results reported above.</p>	End of First Quarter 2026
8.2.3.1.1 Wood and Slash Management	<p>PacifiCorp manages wood and slash generated from vegetation activities in accordance with its Vegetation Management Standard Operating Procedure.¹² Methods are selected based on site conditions and agency/landowner requirements and typically include chip-and-haul in developed areas, chip-and-broadcast in undeveloped areas, and lop-and-scatter where access is limited; these actions occur at the time of pruning or removal.</p> <p>Energy Safety’s audit noted that PacifiCorp did not provide sufficient evidence to demonstrate that wood and slash were properly managed at all work sites for 2024. To address this, PacifiCorp will benchmark debris management- and tracking practices with other California utilities, as described in VM-12 of the 2026–2028 Wildfire Mitigation Plan,¹³ and will use the results to inform potential updates to procedures or data handling going forward.</p>	<p>Second Quarter 2026: Initiate benchmarking activities</p> <p>2027: Consolidate benchmarking data and continue discussion with utilities as needed</p> <p>Third Quarter 2028: Implement changes/improvements to procedures or data management if applicable</p>

⁹ Data Request OEIS-E-SVM_2025-PC-001, Question 4; attachment: “OEIS SVM 4.xlsx.”

¹⁰ Data Request OEIS-E-SVM_2025-PC-002; Question 2.4; attachment “OEIS-SVM 2.4.docx.”

¹¹ Data Request OEIS-E-SVM_2025-PC-002, Question 2.4

¹² “SOP_08292024.pdf”, published August 29, 2024, pp. 11-12

¹³ PacifiCorp, 2026-2028 Wildfire Mitigation Plan Version R1, Published November 26, 2025, pp. 280

Programmatic Area/ Corrective Action #	PacifiCorp's Response	Milestone / Delivery Date
8.2.3.1.2 Pole Clearing (VM-05)	<p>PacifiCorp implements its pole clearing program consistent with PRC 4292, California Code of Regulations §§1250–1257, as applicable, and the California Power Line Fire Prevention Field Guide (Field Guide). The Field Guide identifies exemption criteria, which PacifiCorp applies to its pole clearing program. PacifiCorp's pole clearing targets were historically developed from data sets that included (1) poles physically cleared and (2) poles inspected that did not require clearing at the time of inspection (including poles meeting exemption criteria). In this programmatic context, "pole clearing" comprises both inspection and correction. This is similar to other initiatives (e.g., distribution detailed inspection), where miles inspected do not necessarily result in work being identified at each location. Likewise, some inspected poles will not require vegetation removal; however, inspection remains critical to identify changes in conditions that may or may not necessitate physical clearing around the pole.</p> <p>In PacifiCorp's 2023 SVM Audit Corrective Action Plan,¹⁴ PacifiCorp stated: <i>"PacifiCorp has revised its pole clearing tracking process to more accurately capture poles that are inspected and not worked or are exempt. This change allows for increased accuracy of pole counts..."</i> This supports PacifiCorp's intended methodology of satisfying the initiative target by including poles inspected or exempt and thus meeting the target of 3,126 poles brushed in LRA when considering the combination of poles brushed and poles inspected (counted as unique). As indicated in OEIS SVM 1-2,¹⁵ for each location demonstrated, one pole is cleared. In response¹⁶ to OEIS-E-SVM_2025-PC-002, Question 2.5,¹⁷ PacifiCorp stated that <i>"Pole brushing beyond Public Resources Code (PRC) 4292 includes conducting pole brushing activities on poles (addressing vegetation adjacent to poles) that are outside the scope of PRC 4292."</i> PacifiCorp responded to this data request with the interpretation of "includes" as being a part of the whole (i.e., the pole clearing program beyond PRC 4292 and that exempt and no-work poles are also comprised or included as part of this program).</p> <p>In response to OEIS-E-SVM_2025-PC-002, Question 2.1,¹⁸ PacifiCorp provided attachment OEIS SVM 2.1,¹⁹ which indicates that 2,947 poles were physically cleared, with an additional 21 poles treated with herbicide and not physically cleared, for a total of 2,968 poles cleared and/or treated.</p> <p>PacifiCorp contends that it has met the intent of this initiative, given that the pole clearing program is comprised of poles cleared, or exempt, and that the tracking refinements described in the 2023 SVM</p>	Third Quarter 2026: Inventory framework developed

¹⁴ PacifiCorp, 2023 Substantial Vegetation Management (SVM) Audit Corrective Action Plan R0, Published March 21, 2025, pp. 6

¹⁵ Data Request OEIS-E-SVM_2025-PC-001, Question 18; attachment: "OEIS SVM 1-2.xlsx."

¹⁶ Data Request OEIS-E-SVM_2025-PC-002, Question 2.5; attachment "OEIS-SVM 2.5.docx."

¹⁷ Data Request OEIS-E-SVM_2025-PC-002, Question 2.5

¹⁸ Data Request OEIS-E-SVM_2025-PC-002, Question 2.1

¹⁹ Data Request OEIS-E-SVM_2025-PC-002, Question 2.1; attachment "OEIS-SVM 2.1.docx"

Programmatic Area/ Corrective Action #	PacifiCorp's Response	Milestone / Delivery Date
	<p>Audit Corrective Action Plan have been implemented. PacifiCorp recognizes additional opportunity for continuous improvement. PacifiCorp will continue to revise its pole clearing tracking process by implementing a revised pole clearing inventory and tracking framework to ensure complete and accurate records of poles requiring inspection and/or clearance in LRA HFTD areas. A new baseline will be established through a comprehensive pole inventory that classifies poles as exempt, or non-exempt.</p>	
<p>8.2.3.2 Pruning Beyond Minimum Required Clearance (Increased distances based on tree growth rate)</p>	<p>PacifiCorp applies growth rate-based post-work clearance distances (slow, moderate, fast) as set forth in its Vegetation Management Standard Operating Procedures (SOP) and enforced through contractor work releases and post audits. These distances guide field crews at the time of pruning.</p> <p>Energy Safety found that PacifiCorp does not record tree growth rates or post-work clearance distances at the time of pruning. As stated in the audit, PacifiCorp therefore could not demonstrate that a 12-foot minimum clearance was achieved for slow-growing species, nor that increased clearances were applied for moderate- or fast-growing species at the time of pruning.²⁰ PacifiCorp treats signed contractor work releases as attestations that vegetation work was performed in accordance with PacifiCorp's specifications and SOP requirements²¹, including the use of growth-rate-based post-work- clearance distances. To illustrate current practice, PacifiCorp is providing a signed 2024 work release²² as an example.</p> <p>Measuring and recording post-work clearance distances for each individual tree is not reasonable or practicable. Individual trees can present multiple variable distances, and the activity would materially impede outage critical vegetation work without commensurate benefit. PacifiCorp will continue to rely on its SOP-based distances, contractor attestations, and post-audit program to verify that clearances are applied consistent with species' growth rates.</p>	<p>N/A</p>
<p>8.2.3.2 Pruning Beyond Minimum Required Clearance (Increased clearance distances based on tree physical structure)</p>	<p>PacifiCorp has provided examples of documentation demonstrating that proper pruning methods, including natural target pruning, were applied at the time of work. This documentation includes work releases signed and submitted by the vegetation management contractor; PacifiCorp treats these signed work releases as attestations that the vegetation maintenance work was performed in accordance with the SOP, which addresses natural pruning targets. PacifiCorp has also provided example post-audit reports. Through post-audits, PacifiCorp identifies improper pruning cuts; therefore, when an improper pruning finding is absent, the auditor determined that appropriate pruning practices were sufficiently adhered to at the</p>	<p>N/A</p>

²⁰ OEIS, PacifiCorp's 2024 WMP Vegetation Management Audit, Published December 19, 2025, pp. 24

²¹ "SOP_08292024.pdf", published, August 29, 2024 pp. 33-35

²² " __5G2_FMD_TREES_LLC_2024_ Completed_WORK RELEASE_.pdf"

Programmatic Area/ Corrective Action #	PacifiCorp's Response	Milestone / Delivery Date
	<p>time of work completion.</p> <p>To the extent that additional data are suggested to be captured in the field regarding natural target pruning based on tree physical structure, PacifiCorp believes it is not reasonable for the vegetation management contractor to measure and record post-work pruning data for each individual tree on that basis. To illustrate current practice, PacifiCorp will provide a signed 2024 work release²³ as an example. PacifiCorp treats signed contractor work releases as attestations that vegetation work was performed in accordance with PacifiCorp's specifications and SOP requirements,²⁴ including the use of natural target pruning best practices.</p> <p>Measuring and recording post-work clearance distances achieved due to natural target pruning for each individual tree is not reasonable or practicable. Individual trees can present multiple variable distances, and the activity would materially impede outage critical vegetation work without commensurate benefit. PacifiCorp will continue to rely on its SOP-based distances, contractor attestations, and post-audit program to verify that clearances are applied consistent with species' growth rates.</p>	
8.2.3.4 Substation Defensible Space	<p>PacifiCorp's vegetation program includes inspection and maintenance of vegetation conditions in and around substations, including removal of overhanging or climbable vegetation and weed abatement, and identification/mitigation of nearby hazard trees as part of detailed and patrol inspections.²⁵</p> <p>PacifiCorp is providing the 2024 weed-abatement tracker²⁶ and a representative sample daily weed-abatement report²⁷ with photos for California substations and clarifying that substation-adjacent vegetation inspections (including lines connecting to substations) were performed as part of the 2024 detailed/patrol inspections.</p> <p>Beginning with 2026, PacifiCorp will use its Mobile Data Management System (MDMS) to track substation perimeter inspections, this includes the ability for the inspector to record whether the perimeter inspection was completed and which substation or substation's perimeter were inspected.</p> <p>PacifiCorp is developing reporting to support access to and review of these inspection data.</p>	<p>First Quarter 2026: Tracking capability</p> <p>Third Quarter 2026: Report development</p>

²³ “_5G2_FMD_TREES_LLC_2024_Completed_WORK RELEASE_.pdf”

²⁴ “SOP_08292024.pdf”, published August 29, 2024, pp. 33-35

²⁵ PacifiCorp, 2023-2025 Wildfire Mitigation Plan Update R2, Published February 22, 2024, pp. 204

²⁶ “2024 PP Weed Abatement Facility List (End of year 2024).xlsx”

²⁷ “DCREP PacifiCorp weed abatement 20240416 Yreka.pdf”

Programmatic Area/ Corrective Action #	PacifiCorp's Response	Milestone / Delivery Date
8.2.3.5 High-Risk Species	<p>PacifiCorp maintains high-risk trees (e.g., fast-growing trees) as part of its vegetation management program. PacifiCorp tracks vegetation management activities, such as pruning and removals, by species. Please refer to Data Request OES-E-SVM_2024-PC-001, Question 26 attachment "OEIS SVM 26 CONF.xlsx."²⁸ This attachment contains information regarding vegetation maintenance work completed, including prunes and removals by species.</p> <p>PacifiCorp also provides OEIS SVM 26 CONF_REVISSED_01142026,²⁹ which identifies species that are generally fast-growing and considered high-risk as indicated in the WMP; in this file, fast-growing species are highlighted orange in columns AL, AP, AT, AX, and BB.</p> <p>PacifiCorp will initiate high-risk species/"cyclebuster" identification within its new MDMS (GeoDigital).</p> <p>"OEIS SVM 26 CONF.xlsx" was previously submitted to Energy Safety under a confidentiality declaration³⁰ that remains in effect; please refer to "OEIS SVM Set 1_Confidentiality Declaration.docx."</p>	Second Quarter 2026
8.2.5 Corrective Actions (VM-11)	<p>PacifiCorp is implementing its MDMS, GeoDigital to improve the accuracy and traceability of post-audit activities and any associated re-work under VM-11. The post-audit workflow within GeoDigital is being redesigned to improve end-to-end tracking of identified exceptions through corrective action and closure verification. The redesigned workflow is planned to be operational by the end of the first quarter of 2026, with performance evaluated and refined as necessary following deployment.</p> <p>In parallel, PacifiCorp is developing standardized post-audit reporting capability in GeoDigital to provide clear status visibility and management oversight of post-audit exceptions and related re-work. The initial report is targeted for the second quarter of 2026.</p>	<p>First Quarter 2026: Post-audit process</p> <p>Second Quarter 2026: Standardized post-audit report developed</p>
8.2.6 Vegetation Work	<p>Regarding Statement 22 of the 2024 SVM Audit: PacifiCorp indicated within its 2023-2025 WMP³¹ that "Inspection on a circuit is generally initiated 1-6 weeks prior to the vegetation management corrective maintenance taking place." PacifiCorp phrased this statement in this manner to acknowledge the variability in duration between inspection and vegetation maintenance actions. The statement indicates that inspection generally takes place 1-6 weeks prior to maintenance, which was intended to be interpreted as on average takes place 1-6 weeks prior to maintenance. PacifiCorp completed the majority of the work (61%) within six weeks of inspection as indicated by Energy Safety, which supports the statement in the 2023-2025 WMP that "Inspection on a circuit is generally initiated 1-6 weeks prior to the vegetation management corrective maintenance taking place."</p>	Second Quarter 2026

²⁸ Data Request OES-E-SVM_2024-PC-001, Question 26; attachment "OEIS SVM 26 CONF.xlsx."

²⁹ "OEIS SVM 26 CONF_REVISSED_01142026.xlsx"

³⁰ "OEIS SVM Set 1_Confidentiality Declaration.docx"

³¹ PacifiCorp, 2023-2025 Wildfire Mitigation Plan Update R2, Published February 22, 2024, pp. 191

Programmatic Area/ Corrective Action #	PacifiCorp's Response	Milestone / Delivery Date
	<p>Regarding work prioritization, PacifiCorp has established work priorities (e.g., Priority 1, Priority 2, Priority 3) for applicable activities, each tied to defined completion timeframes, within its MDMS, GeoDigital, which was implemented in the first quarter of 2026.</p> <p>PacifiCorp is developing a report in GeoDigital that will track issuance, status, and completion against the assigned priority and timeframe with a target implementation date by the end of the second quarter of 2026.</p>	
<p>8.2.6 MDMS System 8.2.6 Open Work Locations</p>	<p>Regarding Statement 23 of the 2024 SVM Audit: PacifiCorp identified that the correct attachments may not have been included in the response to data request OEIS-E-SVM_2025-PC-003, Question 3.2.³² As such, PacifiCorp provides attachments Form Link Report³³ and Form Unit Link Report³⁴ which are examples of updated original report versions, respectively. In both attachments, data regarding circuit 8G103 is provided.</p> <p>Energy Safety's audit noted that PacifiCorp's example did not demonstrate implementation of the color-coded prioritization (yellow/orange), did not link inventory (open work orders) to work-complete records, and did not show how work was prioritized.</p> <p>PacifiCorp provides updated examples of its original and updated Form Link report, each populated with data for circuit 8G103. These reports highlight potential data discrepancies for review to help ensure data integrity and are not work prioritization reports. The yellow or orange highlighting that may appear in the Form Link Report is only intended to flag potential data discrepancies.</p> <p>Regarding work prioritization, PacifiCorp has established work priorities (e.g., Priority 1, Priority 2, Priority 3) for applicable activities, each tied to defined completion timeframes, within its MDMS, GeoDigital, which was implemented in the first quarter of 2026, and replaces the "Red Dot" methodology.</p> <p>PacifiCorp is developing a report in GeoDigital that will track issuance, status, and completion against the assigned priority and timeframe with a target implementation date by the end of the second quarter of 2026.</p>	<p>Second Quarter 2026</p>

³² Data Request OEIS-E-SVM_2025-PC-003, Question 3.2

³³ "FORM LINK REPORT.xlsx"

³⁴ "FORM UNIT LINK REPORT.xlsx"

Programmatic Area/ Corrective Action #	PacifiCorp's Response	Milestone / Delivery Date
8.2.7 Forester Certification and Training	<p>PacifiCorp provided documentation directly supporting Statement 24 of the 2024 SVM Audit. Statement 24 reads "PacifiCorp requires that its utility foresters are certified arborists and certified utility specialists by the International Society of Arboriculture (ISA). PacifiCorp is not directly responsible for the training of the vegetation management workforce, who are employees of an independent contractor, however, does provide annual environmental awareness training and conducts audits and crew visits, which may lead to discussions and opportunities for improvement." The phrase "its utility foresters" in the above statement specifically refers to PacifiCorp's employees (utility forestry arborists). As such, PacifiCorp provided supporting documentation to Statement 24 indicating certifications and years of experience for each of its utility foresters.</p> <p>Regarding the contracted workforce, which is not included in Statement 24, PacifiCorp relies on the local union and contractors' training programs to ensure they are trained and qualified. To further support this, PacifiCorp will develop a process to sample workforce qualifications of its contractors.</p>	<p>Second Quarter 2026: Identify contract adjustments and sampling/review process</p> <p>First Quarter 2027: Implement sampling/review process for contractor workforce qualifications</p>

3 Appendix – Supporting Documentation

Below PacifiCorp provides a list of the supporting documentation included as attachments to the corrective action plan.

Programmatic Area/ Corrective Action #	Attachment Name
8.2.2 Vegetation Management Inspections, 8.2.2.1 Detailed Inspection – Distribution (VM-01), 8.2.2.2 Patrol Inspections - Distribution (VM-03)	OEIS-SVM 2.4.docx
8.2.2 Vegetation Management Inspections	OEIS SVM 8-1.xlsx
8.2.2.1 Detailed Inspection - Distribution (VM-01)	OEIS-SVM 2.xlsx
8.2.2.1 Detailed Inspection – Transmission Schedule	OEIS SVM 11.xlsx
8.2.2.2 Patrol Inspections – Distribution (VM-03)	OEIS SVM 4.xlsx
8.2.3.1.1 Wood and Slash Management, 8.2.3.2 Pruning Beyond Minimum Required Clearance	SOP_08292024.pdf
8.2.3.1.2 Pole Clearing (VM-05)	OEIS SVM 1-2.xlsx
8.2.3.1.2 Pole Clearing (VM-05)	OEIS-SVM 2.5.docx
8.2.3.1.2 Pole Clearing (VM-05)	OEIS-SVM 2.1.docx
8.2.3.2 Pruning Beyond Minimum Required Clearance	__5G2_FMD_TREES_LLC_2024_Completed_WORK RELEASE_.pdf
8.2.3.4 Substation Defensible Space	2024 PP Weed Abatement Facility List (End of year 2024).xlsx
8.2.3.4 Substation Defensible Space	DCREP PacifiCorp weed abatement 20240416 Yreka.pdf
8.2.3.5 High-Risk Species	OEIS SVM 26 CONF.xlsx
8.2.3.5 High-Risk Species	OEIS SVM 26 CONF_REVISED_01142026.xlsx

8.2.3.5 High-Risk Species	OEIS SVM Set 1_Confidentiality Declaration.docx
8.2.6 MDMS System, 8.2.6 Open Work Locations	FORM LINK REPORT.xlsx
8.2.6 MDMS System, 8.2.6 Open Work Locations	FORM UNIT LINK REPORT.xlsx