

OFFICE OF ENERGY INFRASTRUCTURE SAFETY

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Caroline Thomas Jacobs, Director

April 12, 2022

Pooja Kishore Regulatory Affairs Manager PacifiCorp pooja.kishore@pacificorp.com

SUBJECT: PacifiCorp 2022 Wildfire Mitigation Plan Data Submittal

Ms. Kishore,

Pursuant to Energy Safety's Final 2022 Wildfire Mitigation Plan (WMP) Update Guidelines,¹ adopted on December 14, 2021,² utilities are required to submit their 2022 First Quarter (Q1) Quarterly Data Reports (QDRs) by May 1, 2022.

The 2022 WMP Guidelines provided a schedule and instructions for QDR submissions (included in Attachment 5), which required that non-spatial data submissions were to follow the schema of *Attachment 3: 2022 Performance Metrics Data Templates*. Further, the final 2022 WMP Guidelines removed the requirement for utilities to submit updated data, including 2022 and 2023 projections, concurrent with submission of a WMP.

Energy Safety reached out to PacifiCorp to request that all available spatial and non-spatial data associated with PacifiCorp's 2022 WMP filing be submitted on April 15, 2022. For any data that is not available on April 15, 2022, Energy Safety requested that PacifiCorp submits this as part of its Q1 QDR submission on May 1, 2022. In response to Energy Safety's request, PacifiCorp confirmed that the non-spatial data requirements can be submitted according to the timescale below:

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¹ Energy Safety's Final 2022 WMP Update Guidelines (accessed February 3, 2022): https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=51912&shareable=true.

² Energy Safety formally adopted the 2022 WMP Update Guidelines on December 14, 2021, during a public meeting held pursuant to Government Code 15475.6. The meeting agenda, slide deck, and a link to the video recording can be found here (accessed February 3, 2022): https://energysafety.ca.gov/events-and-meetings/events/adoption-of-the-2022-wmp-update-guidelines/.

WMP non-spatial data requirements	Submission Date
Table 1	4/15 - Jan 1 – Feb 28 data
Tuble 1	5/1 – Jan 1 – Mar 31 all data
Table 2	4/15 – Jan 1 – Feb 28 (excluding risk events & ignition) data
	5/1 – Jan 1 – Mar 31 all data
Table 3	5/1 – Jan 1 – Mar 31 all data
Table 4	4/15 - Jan 1 – Feb 28 data
	5/1 – Jan 1 – Mar 31 all data
Table 5	4/15 - Jan 1 – Feb 28 data
	5/1 – Jan 1 – Mar 31 all data
Table 6	4/15 - Jan 1 — Feb 28 data
	5/1 – Jan 1 – Mar 31 all data
Table 7.1	5/1 – Jan 1 – Mar 31 all data
Table 7.2	4/15 – All updated data
Table 8	4/15 – All updated data
Table 9	4/15 – All updated data
Table 10	4/15 – All updated data
Table 11	4/15 – Jan 1 – Feb 28 (excluding outage) data
	5/1 – Jan 1 – Mar 31 all data
Table 12	4/15 – All updated data (unless there are items to be
	updated after the 4/15 submission)

Based on the above, Energy Safety does not expect any data to be submitted with PacifiCorp's WMP filing on May 6, 2022, because it will have already been submitted either on April 15 or May 1, 2022. This is providing the data is submitted in the updated format and with the new breakouts (High Fire Threat District (HFTD), non-HFTD) and also includes projections.

Energy Safety appreciates PacifiCorp's cooperation and strict adherence to the timelines set forth above.

Sincerely,

Lucy Morgans

Program Manager, Electric Safety Policy Division

Office of Energy Infrastructure Safety

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