



June 15, 2022

Shelley McCoy
Director, Regulation, PacifiCorp
825 NE Multnomah, Suite 2000
Portland, Oregon 97232

Subject: Office of Energy Infrastructure Safety Issuance of Rejection for Incompleteness and Order to Resubmit for PacifiCorp’s 2022 Wildfire Mitigation Plan Update

Dear Ms. McCoy,

The Office of Energy Infrastructure Safety (Energy Safety) rejects PacifiCorp’s submission of its 2022 Wildfire Mitigation Plan Update (2022 Update). Pursuant to the 2022 Wildfire Mitigation Plan Update Guidelines, Energy Safety may immediately reject any WMP that does not satisfy initial completeness checks. In addition, Public Utilities Code (Pub. Util. Code) Section 8386.3(a), allows Energy Safety to require modification of a WMP before approval. Energy Safety effectuates this by issuing a Rejection for Incompleteness and Order to Resubmit.

PacifiCorp’s 2022 Update does not satisfy the completeness requirements delineated in the 2022 Wildfire Mitigation Plan Update Guidelines. Consequently, Energy Safety rejects PacifiCorp’s 2022 Update without any review of the substance of the 2022 Update submitted material.

PacifiCorp shall revise and resubmit its 2022 Update by July 15, 2022, to include the missing elements and in accordance with the parameters noted in Energy Safety’s Rejection for Incompleteness and Order to Resubmit.

PacifiCorp may not amend or revise any other existing elements in its revised 2022 Update.

Stakeholders may submit comments on PacifiCorp’s revised 2022 Update within 30 calendar days of the resubmittal of PacifiCorp’s revised 2022 Update. Comments are due August 15, 2022. Reply comments are due 7 calendar days later on August 2022, and shall be limited to issues raised and representations made in opening comments of other stakeholders. Opening

and reply comments must be submitted to the 2022 Wildfire Mitigation Plan Updates docket (#2022-WMPs).¹

Sincerely,

A handwritten signature in black ink, appearing to read "Melissa Semcer". The signature is fluid and cursive, written over a light gray rectangular background.

Melissa Semcer
Deputy Director | Electrical Infrastructure Directorate
Office of Energy Infrastructure Safety

Encl: Office of Energy Infrastructure Safety's Rejection for Incompleteness and Order to Resubmit for PacifiCorp's 2022 Wildfire Mitigation Plan Update

¹ Submit comments to the 2022-WMPs docket via the Energy Safety e-filing system here: <https://efiling.energysafety.ca.gov/EFiling/DocketInformation.aspx?docketnumber=2022-WMPs> (accessed June 10, 2022).



OFFICE OF ENERGY INFRASTRUCTURE SAFETY
**REJECTION FOR INCOMPLETENESS
AND ORDER TO RESUBMIT**
**PACIFICORP 2022 WILDFIRE
MITIGATION PLAN UPDATE**

June 15, 2022

1. Introduction

Pursuant to Public Utilities Code (Pub. Util. Code) Section 8386.3(a), before approval of an electrical corporation's (hereafter "utility") Wildfire Mitigation Plan (WMP), the Office of Energy Infrastructure Safety (Energy Safety) may require modification of the WMP. Energy Safety effectuates this by issuing a Rejection for Incompleteness and Order to Resubmit.

Pursuant to the 2022 Wildfire Mitigation Plan Update Guidelines, "Energy Safety will first evaluate each electrical corporation's 2022 WMP Update as submitted for completeness based on the statutory requirements and adherence to the 2022 Guidelines," and "Energy Safety will reject without further review any WMP that does not satisfy initial completeness checks (i.e., incomplete, not fully referenced, or unsubstantiated statutory compliance check list)."²

PacifiCorp's 2022 WMP Update (2022 Update) submitted to Energy Safety's 2022 WMP docket (#2022-WMPs) on May 6, 2022, does not satisfy the completeness requirements.

Consequently, Energy Safety rejects PacifiCorp's 2022 Update without any review of the substance of the 2022 Update information submitted.

This Rejection for Incompleteness and Order to Resubmit documents the statutorily and/or guidelines-required elements missing from PacifiCorp's 2022 Update. PacifiCorp must revise its 2022 Update to include the missing elements according to the parameters set forth herein. Section 3 provides submission instructions and deadlines.

2. Missing Required Elements

PacifiCorp is missing the following elements in its 2022 Update:

- **7.3.1 Risk Assessment and Mapping**
 - *Section 7.3.1.2 (Climate-driven risk map and modeling based on various relevant weather scenarios) and Section 7.3.1.3 (Ignition probability mapping showing the probability of ignition along the electric lines and equipment) refers to an irrelevant Section 7.3.1.1 (summarized risk map that shows the overall ignition probability and estimated wildfire consequence along the electric lines and equipment).*

² Final 2022 Wildfire Mitigation Plan Update Guidelines, Attachment 5, p. 4 (accessed June 10, 2022): <https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=51912&shareable=true>.

- *Section 7.3.1.4 (Initiative mapping and estimation of wildfire and PSPS risk-reduction impact)* is missing altogether.
- *Section 7.3.1.5 (Match drop simulations showing the potential wildfire consequence of ignitions that occur along the electric lines and equipment)* is missing altogether.
- New requirement (*Maps on long-term climate trends*) is missing. It appears to be combined into existing maps in Section 4.5, but no explanation/narrative is provided.
- **7.3.3 Grid Design and System Hardening**
 - *Section 7.3.3.6 (Pole replacements)* has no substantive information and refers to Section 7.3.3.3 (*Covered conductor installation*). No information provided in Section 7.3.3.3 relates to pole replacements.
 - *Section 7.3.3.16 (Undergrounding)* has no substantive information and refers to Section 7.3.3.3 (*Covered conductor installation*). No information provided in Section 7.3.3.3 related to undergrounding.
 - PacifiCorp's 2022 Update should have a section specific to undergrounding; undergrounding is mentioned briefly in Section 7.3.3.3 but does not have all required information.
- **7.3.6 Grid Operations and Protocols**
 - *Section 7.3.6.5 (Protocols for PSPS re-energization)* refers to the PSPS section and Section 7.3.9.5 (Preparedness and planning for service restorations) and does not include detailed initiative information required by the Guidelines.
 - *Section 7.3.6.6 (PSPS events and mitigation of PSPS impacts)* refers to Section 7.3.3 (Grid design and system hardening section) and Section 4.4 (*Research proposals and findings*). It does not include detailed initiative information required by the Guidelines.
- **7.3.7 Data Governance**
 - *Section 7.3.7.1 (Centralized repository for data)* is misinterpreted as only applying to QDR GIS data.
 - *Section 7.3.7.3 (Documentation and disclosure of wildfire-related data and algorithms)* states, "At this time, PacifiCorp does not have any specific wildfire mitigation programs focused on documentation and disclosure of wildfire-related data and algorithms." However, PacifiCorp does provide information in Section 4.5 related to its model and metric calculation methodologies, yet PacifiCorp does not make reference to or provide relevant details on applicable data collection or documentation in 7.3.7.3.
 - *Section 7.3.7.4 (Tracking and analysis of near-miss data)* is too scant to evaluate.
- **7.3.8 Resource Allocation Methodology**

- *Section 7.3.8.1 (Allocation methodology development and application)* includes only a short narrative that does not provide all the required information for this mitigation initiative.
- *Section 7.3.8.2 (Risk reduction scenario development analysis)* refers to PacifiCorp's 2021 Progress Report instead of reporting this information directly in the 2022 Update and includes only a short narrative that does not provide all the required information for this mitigation initiative.
- *Section 7.3.8.3 (Risk-spend efficiency analysis – not to include PSPS)* includes only a short narrative that does not provide all the required information for this mitigation initiative.
- **7.3.10 Stakeholder Cooperation and Community Engagement**
 - *Section 7.3.10.4 (Forest service and fuel reduction cooperation and joint roadmap)* refers to *Section 7.3.5.2 (Detailed inspections and management practices for vegetation clearances around distribution electrical lines and equipment)*; however, no information provided in *Section 7.3.5.2* relates to cooperation with the forest service on fuel reduction efforts.
- **8.0 Public Safety Power Shutoffs (PSPS)**
 - *Section 8.1 (Directional vision for necessity of PSPS, p. 232)* references an outside report: "Lessons learned from the 2021 PSPS experience... can be found in PacifiCorp's PSPS Post Event Report," instead of reporting this information directly in the 2022 Update.
 - *Section 8.2 (Protocols on PSPS)* refers to other sections of the 2022 Update (*Sections 7.3.9.4 and 7.3.9.5*) and includes only a short narrative that does not provide all the required information to address the 6 questions from *Section 8.2* of the Guidelines.
 - *Section 8.4 (Engaging vulnerable communities)* provides no detail and refers to an outside document; other utilities list responses and address language requirements within this section of the WMP, as required. PacifiCorp refers to other sections of the 2022 Update where *Section 8.4* Guideline questions 1 and 4 are cursorily addressed. An answer to question 3 is incorrectly found in *Section 8.2*.

PacifiCorp shall revise and resubmit its 2022 Update to include the missing elements noted above. The revisions shall only include the missing elements. PacifiCorp may not amend or change any other elements in the 2022 Update. Any changes to the 2022 Update other than those requested will be disregarded in the substantive evaluation.

3. Conclusion and Next Steps

PacifiCorp shall revise and resubmit its 2022 Update to Energy Safety by July 15, 2022.

PacifiCorp must submit its revised 2022 Update to:

- 1) the Energy Safety Deputy Director at melissa.semcer@energysafety.ca.gov,
- 2) the 2022 Wildfire Mitigation Plan Updates docket (#2022-WMPs), and
- 3) the California Department of Forestry and Fire Protection at CALFIREUtilityFireMitigationUnit@fire.ca.gov (CAL FIRE).

PacifiCorp must submit a redline and clean version of its revised 2022 Update. For all updated auxiliary Excel files, PacifiCorp must provide a clean version of the file and a change log that documents all adjustments to the file.

Submission files must use the naming conventions provide in the 2022 Guidelines.³ For example, “2022-07-15_PC_2022_WMP-Update_R1,” refers to PacifiCorp’s 2022 Update, revision 1, submitted on July 15, 2022. The redlined version must be named “2022-07-15_PC_2022_WMP-Update_R1_redlined” and the auxiliary excel file “2022-07-15_PC_2022_WMP-Update_R1_Tables 1-12.”

Stakeholders may submit comments on PacifiCorp’s revised 2022 Update within 30 calendar days of July 15, 2022. Reply comments are due 7 calendar days thereafter and shall be limited to issues raised and representations made in opening comments of other stakeholders. Opening and reply comments must be submitted to the 2022 Wildfire Mitigation Plan Updates docket (#2022-WMPs).

The dates for this Rejection for Incompleteness and Order to Resubmit are:

Rejection for Incompleteness and Order to Resubmit:	June 15, 2022
PacifiCorp’s Revised 2022 Update Due:	July 15, 2022
Public and Stakeholder Comments Due:	August 15, 2022
Reply Comments Due:	August 22, 2022
Draft Decision Issued by Energy Safety:	September 12, 2022

Energy Safety has not conducted a substantive evaluation of PacifiCorp’s 2022 Update. The submission of a revised 2022 Update with the noted required elements does not guarantee the approval of PacifiCorp’s 2022 Update. Energy Safety will consider PacifiCorp’s revised 2022 Update, stakeholder comments, responses to data requests and the totality of the information before it to date before issuing a determination on PacifiCorp’s 2022 Update pursuant to Pub. Util. Code Sections 8386(b) and 8386.3(a).

³Guidelines for Submission and Review of 2022 Wildfire Mitigation Plan Updates, Office of Energy Infrastructure Safety, Attachment 5, Electronic File Naming Convention with Examples, p.8.

If PacifiCorp fails to submit a revised 2022 Update that includes all missing elements set forth in Section 2 by July 15, 2022, Energy Safety may deny PacifiCorp's 2022 Update without further notice.

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