

Count	Party Name	DR Set #	Data Request	Question No.	Question ID	Question Text	Requestor	Date Received	Due Date	Date Sent	WMP Section	Response	Number of Attachments	Attachment Name	NDA Required
1	CalPA	2022WMP-06	2022-WMP	1	CalPA Data Request 6.1	2022 WMP Update submission, and to the attached Follow-up Accident Report submitted to the CPUC regarding the Slater Fire (the "Accident Report"), dated October, 16, 2020 - the Accident Report states that "Pacific Power is conducting a full investigation of the cause and origin of the fire." (a)Please provide Pacific Power's analysis of the cause and origin of the Slater Fire. (b)Please include all documentation (including but not limited to root cause analyses, risk and mitigation analyses, reports, work papers, etc.) regarding the analysis discussed in subpart (a) above.	Matthew Karle Miles Gordon Carolyn Chen Layla Labagh	5/19/2022	5/24/2022	5/24/2022		PacifiCorp objects; PacifiCorp's investigation of the Slater Fire is protected by the attorney-client privilege and the attorney work product doctrine; there is pending litigation regarding the Slater Fire			
2	CalPA	2022WMP-06	2022-WMP	2	CalPA Data Request 6.2	2022 WMP Update submission, and to the attached Follow-up Accident Report submitted to the CPUC regarding the Slater Fire (the "Accident Report"), dated October, 16, 2020 - This question pertains to external documents, meaning any investigation, examination, or analysis of the Slater Fire that was not performed by PacifiCorp. (a)Please provide any external investigation reports that PacifiCorp possesses regarding the Slater Fire, including but not limited to CPUC or U.S. Forest Service investigation reports. (b)Are you aware of any external investigation reports or analyses pertaining to the Slater Fire, aside from those covered by part (a) of this question? If so, please identify each such document.	Matthew Karle Miles Gordon Carolyn Chen Layla Labagh	5/19/2022	5/24/2022	5/24/2022		Please refer to Attachment CalPA 6.2.	1	Attachment CalPA 6.2	
3	CalPA	2022WMP-06	2022-WMP	3	CalPA Data Request 6.3	2022 WMP Update submission, and to the attached Follow-up Accident Report submitted to the CPUC regarding the Slater Fire (the "Accident Report"), dated October, 16, 2020 (a)T Based on the reports and analyses addressed in questions 1 and 2, what has PacifiCorp learned about wildfire risk in its service territory and wildfire mitigation methods. Please identify each lesson separately. (b)Please state the basis of each lesson identified in part (a) above.	Matthew Karle Miles Gordon Carolyn Chen Layla Labagh	5/19/2022	5/24/2022	5/24/2022		PacifiCorp objects; PacifiCorp's investigation of the Slater Fire is protected by the attorney-client privilege and the attorney work product doctrine; there is pending litigation regarding the Slater Fire.			
4	CalPA	2022WMP-06	2022-WMP	4	CalPA Data Request 6.4	2022 WMP Update submission, and to the attached Follow-up Accident Report submitted to the CPUC regarding the Slater Fire (the "Accident Report"), dated October, 16, 2020 - the Accident Report also states that "Pacific Power is repairing the [sic] all the facilities affected by the fire". (a)Please provide a detailed description of these repairs referenced above. (b)Please provide a detailed description of any other changes made to Pacific Power's system as a result of the Slater Fire and resultant investigations.	Matthew Karle Miles Gordon Carolyn Chen Layla Labagh	5/19/2022	5/24/2022	5/24/2022		(a)Repairs of facilities largely include the rebuild of transmission and distribution lines and the associated equipment damaged by the wildfire. Rebuild of damaged assets includes the restoration of damaged portions of transmission line 33. To support wildfire mitigation efforts, pole materials used will be a stronger nonwooden solution and a more fire resilient material such as fiberglass or steel. In addition to the line 33 rebuild, repairs also include distribution pole replacement and the replacement of transformers which were damaged by the fire. The line rebuild and pole replacements shall be installed as per the most recent engineering standards, aligning with California General Orders (GO). (b)PacifiCorp objects; PacifiCorp's investigation of the Slater Fire is protected by the attorney-client privilege and the attorney work product doctrine; there is pending litigation regarding the Slater Fire.			
5	CalPA	2022WMP-07	2022-WMP	1	CalPA Data Request 7.1	2022 WMP Update submission - On p. 140 of PacifiCorp's 2022 WMP update, figure 7.2 indicates an increase in the number of fire risk events related to equipment failures, contact from objects, and other. (a)Please provide an explanation for the increase in risk events from 2020 to 2021, for each of the following outage causes: i.Equipment Failures ii.Contact from object iii.Other (b)Please provide a breakdown of the number of risk events by HFTD area for 2020 and 2021 as shown below. (c)What were the 3 most frequent types of equipment failure in 2021? (d)What was the most frequent type of object to contact a conductor in 2021? (e)As used in Table 7.2 on p. 140, how is "other" defined?	Matthew Karle Charles Madison Carolyn Chen Layla Labagh	5/19/2022	5/24/2022	5/25/2022		Referencing PacifiCorp's 2022 Wildfire Mitigation Plan (WMP) Update, the Company responds as follows: (a)The data in Figure 7.2 is generally used to identify most commonly occurring risk drivers and not to identify trends in risk events. Caution is advised when only comparing data year-by-year, as it may not be indicative of a trend or significant difference. Trends and observations derived from small data sets can be misleading or not meaningful. Additionally, PacifiCorp has yet to install a significant amount of covered conductor or implement all initiatives on full circuits or segments. The combination of mitigation strategies on entire circuits or segments is often needed to begin to realize the benefits. Furthermore, between 2020 and 2021, PacifiCorp began to implement Elevated Fire Risk settings. While important to mitigating the risk of wildfire, these settings can have an inverse relationship with reliability and an increase in outage events. (b)PacifiCorp does not currently have the data segmented in this manner and PacifiCorp's subject matter expert (SME) is out unexpectedly for a family emergency. The PacifiCorp resource with the source file for this data has been out on leave, but is expected to return this week. PacifiCorp is seeking an extension to June 3, 2022 to re-analyze and map this data to provide the breakout in this specific way. (c)Keeping in mind that equipment failure can sometimes be the result of external factors or other impacting causes, the three most frequent types of equipment failures in 2021 were: 1.Fuse damage or failure 2.Connection device damage or failure 3.Conductor damage or failure (d)The most frequent type of contact from object associated with outage risk event data in 2021 is vegetation contact.			

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6	CalPA	2022WMP-07	2022-WMP	2	CalPA Data Request 7.2	<p>2022 WMP Update submission - On p. 142 of PacifiCorp's 2022 WMP update, PacifiCorp states the following:</p> <p>PacifiCorp has encountered challenges related to limited field resources, particularly as it related to construction activities. The business plans to address these challenges through the hiring on [sic] additional contractors, as described in Section 9.3 starting on page 255.</p> <p>(a)Which specific wildfire mitigation initiatives have been adversely impacted by the resource challenges referenced in the above quote?</p> <p>(b)Given the resource challenges referenced in the quote above, please explain why PacifiCorp increased total WMP initiative spending from \$33.4 million in 2021 to \$96.8 million in 2022.</p> <p>(c)If any, identify any efficiency gains or technology that PacifiCorp will deploy in 2022 to lessen the adverse impact of the resource challenges discussed on page 142.</p>	Matthew Karle Charles Madison Carolyn Chen Layla Labagh	5/19/2022	5/24/2022	5/25/2022		<p>Referencing PacifiCorp's 2022 Wildfire Mitigation Plan (WMP) Update, the Company responds as follows:</p> <p>(a)Initiatives referenced in the above quote include covered conductor installation, distribution pole replacement and reinforcement, expulsion fuse replacement, and installation of system automation equipment.</p> <p>(b)Many of the grid hardening projects being worked are multi-year projects, so where the engineering (internal lower cost) may take place in one year, the construction (more expensive component of spend) can take place in the next year. The increased spend accounts for many grid hardening projects progressing to the construction phase. A typical line rebuild project, consists of scope, design, and permitting phases which take several months to complete and are the relatively lesser cost phases of a project. Typically, the largest spend is realized during the construction phase, which can happen in a different year than the engineering work, an example timeline is presented in the graphic below. As PacifiCorp has now progressed into the construction phase on many projects, actual costs are now available. As described in the 2021 Change Order, significantly higher than anticipated costs are being realized and forecasted spend has been adjusted to incorporate this cost increase.</p> <p>(c)PacifiCorp's resource challenges have been largely due to obtaining dedicated internal resources, extending the initiation/engineering phase of the programs. PacifiCorp plans to address this issue through a Construction Contractor Partner. Currently grid hardening efforts are supported by operations, procurement, engineering, environmental and real estate support functions which are shared resources with other programs. Projects are managed individually. However, with the updated contract management strategy to have a Construction Contractor Partner, the partner will have fully dedicated teams to provide: project management, project controls, project reporting, engineering, estimating, permitting, environmental surveys, land acquisition, public engagement, material procurement, material management, construction, post construction inspections, equipment commissioning and inspection, as well as maintenance program development. This strategy will also</p>			
7	CalPA	2022WMP-07	2022-WMP	3	CalPA Data Request 7.3	<p>2022 WMP Update submission – On p. 195 of PacifiCorp's 2022 WMP update, PacifiCorp states that:</p> <p>In addition, inspectors identify for pruning or removal fast-growing vegetation that is likely to violate minimum clearance distances before the end of the current growing season.</p> <p>(a)Are the inspectors who perform this work for PacifiCorp described in the quote above certified arborists?</p> <p>(b)Are the inspectors who perform this work described in the quote above PacifiCorp employees or contractors?</p>	Matthew Karle Charles Madison Carolyn Chen Layla Labagh	5/19/2022	5/24/2022	5/25/2022		<p>Referencing PacifiCorp's 2022 Wildfire Mitigation Plan (WMP) Update, the Company responds as follows:</p> <p>(a)Inspectors who perform the pre-listing work (identification of trees for pruning or removal) are certified International Society of Arboriculture (ISA) arborists or currently in process of becoming certified (studying for ISA certification exam or gaining needed work experience prior to taking the exam). In both cases, the inspectors' field supervisor holds ISA certifications and oversees their work.</p> <p>(b)Inspectors that perform this work are typically contractors.</p>			
8	CalPA	2022WMP-07	2022-WMP	4	CalPA Data Request 7.4	<p>2022 WMP Update submission – On p. 197 of PacifiCorp's 2022 WMP update, PacifiCorp describes its audit process where:</p> <p>PacifiCorp currently uses internal staff with ISA certifications to conduct post-work audits of routine maintenance, readiness patrol corrective actions, and pole clearing. PacifiCorp also conducts ad hoc tree crew audits or crew visits where a PacifiCorp forester engages with the vegetation management contractor, such as a crew leader, and/or supervisor to review work and/or discuss opportunities for improvement.</p> <p>(a)How many ad hoc tree crew audits were conducted in 2021?</p> <p>(b)Please disaggregate the figure in part (a) by HFTD tier, as defined above in definitions P through S.</p> <p>(c)Were HFTD areas prioritized over other areas for ad hoc tree crew audits in 2021?</p> <p>(d)How many ad hoc tree crew or post-work audits found that corrective action was needed in 2021?</p> <p>(e)How many supplemental tree trimming or removal jobs occurred in 2021 as a result of an ad hoc tree crew audit?</p> <p>(f)Please describe PacifiCorp's process for making improvements after an ad hoc tree crew audit, including whether ad hoc tree crew audits lead to supplemental tree trimming/removal, retraining of contractors, process changes, or all of the above.</p>	Matthew Karle Charles Madison Carolyn Chen Layla Labagh	5/19/2022	5/24/2022	5/25/2022		<p>Referencing PacifiCorp's 2022 Wildfire Mitigation Plan (WMP) Update, the Company responds as follows:</p> <p>(a)PacifiCorp currently does not have centralized means to track ad hoc crew visits. These are conducted by PacifiCorp foresters during visits with tree crews during normal business or through electronic communication. These visits may be discussions where work specifications, timesheets, program processes, etc., may be reviewed with the tree crews and contractor management. The PacifiCorp forester may also complete a safety review in conjunction with these visits when in the field and fill out a Tree Crew Inspection form (hard copy).</p> <p>(b)PacifiCorp currently does not have centralized means to track ad hoc crew visits.</p> <p>(c)PacifiCorp currently does not have centralized means to track ad hoc crew visits.</p> <p>(d)In 2021, PacifiCorp post work audits were transitioned to use a mobile data management software. Based on this dataset, 58 distribution and transmission lines were post-work audited that resulted in a correction activity identified (audit exception). PacifiCorp currently does not have centralized means to track ad hoc crew visit findings.</p> <p>(e)PacifiCorp currently does not have centralized means to track ad hoc crew visit findings.</p> <p>(f)Opportunities for improvement that are discussed with tree crews during tree crew visits may also be reviewed with contractor management during recurring conference calls or in-person meetings. Opportunities for improvement are discussed and followed up on during meetings and other interactions with contractor management to drive continuous improvement and adherence with program processes to implement the work. These interactions may lead to training opportunities with staff and process changes/refinements.</p>			

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9	CalPA	2022WMP-07	2022-WMP	5	CalPA Data Request 7.5	2022 WMP Update submission – On p. 208 of PacifiCorp’s 2022 WMP update, PacifiCorp states that: Implementing and continuously improving this program requires advanced investigation of fault events to understand the nature and type of faults and whether this program is properly mitigating these events. (a)Does PacifiCorp have the capability to conduct an “advanced investigation of fault events” as referenced on page 208? (b)If answer to (a) is no, why not? (c)Does PacifiCorp retain a consultant or contractor to perform “advanced investigation of fault events” as referenced on page 208?	Matthew Karle Charles Madison Carolyn Chen Layla Labagh	5/19/2022	5/24/2022	5/25/2022		Referencing PacifiCorp’s 2022 Wildfire Mitigation Plan (WMP) Update, the Company responds as follows: (a)PacifiCorp has significant experience with fault event investigation using traditional protection and control schemes. When a fault is detected, regional operators notify and dispatch operations professionals and technicians to locate and troubleshoot the cause of outages to restore power. This traditionally involves patrols and visual confirmation of the outage cause, such as car-hit-pole. Outage records are created and, where needed, additional investigation is conducted such as material failure analysis. With new programs, such as those discussed in both Section 7.3.6.1 and Section 7.3.6.2, the company is leveraging different protection and control schemes to mitigate wildfire risk. These can include the disabling of reclosing, as included in Section 7.3.6.1, or the use of Elevated Fire Risk (EFR) settings discussed in Section 7.3.6.2. Both of these initiatives will most likely result in additional outage events, many of which may be the result of momentary contact that will not allow for visual confirmation of the outage cause. Therefore, with these programs, PacifiCorp will need to think differently about fault investigations, which could include additional patrols or the interrogation of additional fault data from relays or other coordinating devices. To limit the impact this can have, PacifiCorp is also deploying communication fault indicators as discussed in Section 7.3.2.3. Incorporation of these fault indicators will also require a change to fault investigation practices but ultimately mitigate the impact to customers associated with changes to protection and control schemes and settings to mitigate wildfire risk, not include visual confirmation result in visual confirmation of the outage cause. With either of these programs, PacifiCorp will need to understand outage records and investigate faults differently. (b)Not applicable. (c)Not at this time. The regional operations supervisors will leverage new fault indicator data and direct the PacifiCorp technicians to the location of a fault for the initial investigation and how to restore the outage. PacifiCorp’s field engineering group and technical support groups will analyze the additional information from			
10	CalPA	2022WMP-07	2022-WMP	6	CalPA Data Request 7.6	2022 WMP Update submission – On p. 222 of PacifiCorp’s 2022 WMP update, PacifiCorp (in describing its emergency protocols) mentions its Emergency Coordination Center: The protocol includes activation of an Emergency Coordination Center (ECC), communication with local public safety partners, and implementation of additional monitoring activities. The ECC is staffed by specialized staff who assemble during de-energization warning and implementation to provide critical operations support through the collection and analysis of data. (a)When emergencies occur in PacifiCorp’s California service territory, is PacifiCorp’s ECC located in California? (b)How does PacifiCorp intend to balance ECC resources between California and other parts of its territory, if simultaneous wildfire events should occur in separate states? (c)Is PacifiCorp’s ECC staff trained in the Incident Command Structure (ICS) system?	Matthew Karle Charles Madison Carolyn Chen Layla Labagh	5/19/2022	5/24/2022	5/25/2022		Referencing PacifiCorp’s 2022 Wildfire Mitigation Plan (WMP) Update, the Company responds as follows: (a)No, PacifiCorp’s primary Emergency Coordination Center (ECC) locations are located in Portland, Oregon and emergency coordination will be coming from there if emergencies occur in California. (b)PacifiCorp prepares for this type of scenario where multiple emergencies occur simultaneously. Additional personnel have been added in various roles to continue to support redundancy. The Company can draw from operations organizations in multiple states, including personnel in Salt Lake City, Utah. In the event that simultaneous wildfire events should occur in separate states, PacifiCorp will make resource assessments based on existing conditions during a response. If needed, mutual assistance may be requested to fill any resourcing gaps to ensure coverage of all situations and ongoing events. (c)PacifiCorp’s ECC staff are trained in the Incident Command Structure (ICS) system as part of their training and adherence to the National Incident Management System (NIMS) guidelines which includes the ICS processes.			
11	OEIS		OEIS-PC-22-001	1	OEIS Data Request 1.1	Expenditure Discrepancies (a)In PacifiCorp’s non-spatial data Table 12, there are many instances of WMP expenditure totals not matching those in WMP Tables 3.1-1 and 3.1-2. For example, according to Table 12 of its Q1 2022 Quarterly Data Report (“20220502T144302_QDR.xlsx”), PacifiCorp’s territory spend in 2020 was \$10,003.2 (\$ thousands; summing columns AA and AC); however, according to Tables 3.1-1 and 3.1-2 from its 2022 WMP Update (pp. 27-28), PacifiCorp’s territory spend in 2020 was \$19,416 (\$ thousands). There are many such expenditure discrepancy examples. Please clarify which totals are correct by submitting updated WMP Tables 3.1-1 and 3.1-2 and/or a revised Table 12 in excel format, whichever is deemed necessary to rectify the errors. i.For reference, the following have been found with discrepancies between PacifiCorp’s Table 12 versus its 2022 WMP Update Tables 3.1-1 and/or 3.1-2: 1.Territory spend – 2020 Actual (described above) 2.Territory spend – 2021 Actual 3.Situational Awareness spend – 2021 Actual 4.Grid Design and System Hardening spend – 2020 Actual, 2021 Actual, and 2022 Projected/Planned 5.Vegetation Management spend – 2021 Actual 6.Resource Allocation spend – 2020 Actual 7.Emergency Planning and Preparedness spend – 2022 Projected	Jessica McHale	5/20/2022	5/25/2022	5/26/2022		Summing of columns AA and AC in the Q1 2022 Quarterly Data Report (QDR) provides the total spend for programs for which the scope includes areas outside of the high fire threat district (HFTD) only. For example, the Covered Conductor initiative 7.3.3.3 which is only located within the HFTD, thus the spend is accounted for inside the HFTD, is not included in the \$10,003 (\$ in thousands) mentioned in the question above. It is recommended to account for all spend to sum columns AA, AB, AC, and AD for comparison to Table 3.1-1 and Table 3.1-2. Additionally, it would appear that Table 3.1-1 and Table 3.1-2 were not populated using the final Q1 2022 data. The revised totals have been included below that should align with the final Q1 2022 data. Table 3.1 Summary of WMP expenditures – Total (WMP Table 3.1-1) Year Spend in thousands of \$USD Spend in thousands of \$USD (Values entered in the 2022 WMP) 2020 Planned \$25,011 \$25,011 2020 Actual \$18,520 \$19,416 2020 Difference \$6,491 \$5,595 2021 Planned \$33,375 \$33,375 2021 Actual \$42,149 \$33,098 2021 Difference (\$8,774) \$277 2022 Planned \$91,900 \$96,819 2020-22 Planned (With 2020 and 2021 Actual) \$152,570 \$149,333 Table 3.2. Summary of WMP expenditures by category (WMP Table 3.1-2) WMP Category 2020 2021 2022 2020-2022 Planned (w/ 2020 and 2021 Actuals)			

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12	OEIS		OEIS-PC-22-001	2	OEIS Data Request 1.2	Weather Stations (a)How many of PacifiCorp's weather stations are Remote Automatic Weather Stations (RAWS)? (b)How many of PacifiCorp's weather stations are Micro Weather Stations (MWS)? (c)Are any of PacifiCorp's weather stations outfitted with 10hr fuel moisture sensors? (d)Are any of PacifiCorp's weather stations able to report weather observations more frequently than every 10 minutes? (e)What is the total number of weather stations PacifiCorp plans to have deployed in its weather station network for optimal density?	Jessica McHale	5/20/2022	5/25/2022	5/26/2022		(a)There are two remote automatic weather stations (RAWS) that were installed in January of 2021. There are no active plans to install additional RAWS, but they will be considered if the locations do not allow for a micro weather station (MWS) to be installed. (b)There were 31 MWS installed by the end of 2021. In 2022, an additional 50 MWS are planned to be added, giving a total of 81 MWS in the state. (c)For MWS installed prior to 2021, the fuel moisture sensors were included with the installation, and maintained as part of the preventative maintenance program. For 2022, onward, PacifiCorp identified that data regarding dead and live fuel moisture can be provided through Technosylva weather modelling. (d)The weather stations have the ability to be programmed for more frequent observations. To date, the 10-minute weather data has been granular enough for real time operations and longer term risk modeling. As PacifiCorp develops additional dynamic risk modeling capability, the Company may investigate whether or not an increased frequency of weather station data can provide additional benefits. (e)At the end of 2021, there were 33 weather stations, and the intended plan is to install 50 additional weather stations in 2022. That would give a weather station network of 83 stations in California. However, PacifiCorp has not determined the optimal final density of weather stations in California. Page 153 of PacifiCorp's 2022 Wildfire Mitigation Plan (WMP) mentions plans to develop a weather station circuit based methodology which will support determination of a weather station optimal density.			
13	OEIS		OEIS-PC-22-001	3	OEIS Data Request 1.3	Continuous Monitoring Sensors (a)In Table 5.2 (WMP Table 5.3-1) on page 115 of PacifiCorp's 2022 WMP Update, the 2021 target for "Continuous monitoring sensors" is 22, with a completion of only 2 in 2021. i.Please provide details on the missed target of 22. ii.If the target number is inaccurate, please provide the correct number of sensors targeted in 2021.	Jessica McHale	5/20/2022	5/25/2022	5/26/2022		(a)Please refer to the Company's responses to subparts i. and ii. below: i.PacifiCorp makes every attempt to report an accurate plan, however at the time where the target of 22 was put into the 2020 Wildfire Mitigation Plan (WMP), the full scope of the pilot program was being drafted. As PacifiCorp worked with Texas A&M University to identify the scope and circuits for the pilot program, a final number of four distribution fault anticipation (DFA) devices in California was set for this initial phase of the pilot. Therefore, PacifiCorp has updated its reported targets to align with the pilot plan. ii.The correct number for 2021 is two.			
14	OEIS		OEIS-PC-22-001	4	OEIS Data Request 1.4	Fuel Moisture Sampling (a)Does PacifiCorp conduct fuel moisture sampling for live vegetation?	Jessica McHale	5/20/2022	5/25/2022	5/26/2022		No, there are no fuel moisture sampling sensors or devices utilized for live vegetation. While PacifiCorp does not have devices or sensors for live vegetation fuel moisture sampling, live vegetation fuel moisture can be obtained from fire agencies for use.			
15	OEIS		OEIS-PC-22-001	5	OEIS Data Request 1.5	HD Camera Installation (a)In section 4.4.1.1 and 7.3.2.2 PacifiCorp describes developing a new wildfire detection program. i.In 2022, how many HD Cameras does PacifiCorp plan to install in its CA service territory. ii.Will PacifiCorp be leveraging Satellite Fire Detection as part of its wildfire detection program?	Jessica McHale	5/20/2022	5/25/2022	5/26/2022		(a)Please refer to the Company's responses to subparts i. and ii. below: i.PacifiCorp is currently in the scoping phase of the Wildfire Detection program which will include HD Cameras. At this time, the exact number of HD Cameras is being determined and will probably not become operational until 2023. ii.At this time, PacifiCorp does not plan to have a separate pilot for Satellite Fire Detection. With the procurement of Technosylva, PacifiCorp plans to utilize their services for fire detection which may include the use of Satellite Fire Detection.			
16	OEIS		OEIS-PC-22-001	6	OEIS Data Request 1.6	Fire Potential Index (a)Does PacifiCorp currently have a Fire Potential Index (FPI) or another metric that serves as an FPI? i.If not, describe how PacifiCorp plans to develop an FPI.	Jessica McHale	5/20/2022	5/25/2022	5/26/2022		(a)No. i.Currently, PacifiCorp is working towards the development of a Fire Potential Index (FPI), as stated on page 36 of PacifiCorp's 2022 Wildfire Mitigation Plan (WMP). The first step of this is to procure the Technosylva WFA-E module, as described in the graphic below, which was presented on May 18, 2022 in the "2022 Wildfire Mitigation Plan Update Workshop for SMJUs and ITOs" submissions with the California Office of Energy Infrastructure Safety (OEIS).			
17	OEIS		OEIS-PC-22-001	7	OEIS Data Request 1.7	Maturity Survey (a)In question B.I.b of PacifiCorp's 2022 Wildfire Mitigation Plan Maturity Survey (2022 Maturity Survey), PacifiCorp plans to automatically validate field calibrations on its weather stations by January 2023. i.Provide details on what work PacifiCorp is doing in 2022 to meet this goal. (b)In question B.V.b of PacifiCorp's 2022 Maturity Survey, PacifiCorp anticipates having well-defined equipment for detecting ignitions along the grid by January 2023. i.Provide details on what type of equipment PacifiCorp plans to have installed in 2022 to meet this goal.	Jessica McHale	5/20/2022	5/25/2022	5/26/2022		(a)Please refer to the Company's response to subpart i. below: i.To automatically validate the field calibrations there are settings in the weather station's data logger which can be changed to record when calibrations occurred. (b)Please refer to the Company's response to subpart i. below: i.PacifiCorp identified a potential aggregating error with the 2022 maturity survey. While the summary above describes PacifiCorp's 2023 plan as "ii. Well-defined equipment for detecting ignitions along grid", the actual response was "i. No consistent set of equipment for detecting ignitions along the grid". Please refer to the screenshot provided below: However, the implementation of cameras is being explored in the research project to support further maturation in this area. While the Company does not expect to have a consistent set of equipment across the grid, the Company is looking to improve detection capabilities beyond existing fault detection capabilities that exist with its system today.			

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18	CalPA	2022WMP-07	2022-WMP	1	1st Supplemental Response to CalPA Data Request 7.1	2022 WMP Update submission - On p. 140 of PacifiCorp's 2022 WMP update, figure 7.2 indicates an increase in the number of fire risk events related to equipment failures, contact from objects, and other. (a)Please provide an explanation for the increase in risk events from 2020 to 2021, for each of the following outage causes: i.Equipment Failures ii.Contact from object iii.Other (b)Please provide a breakdown of the number of risk events by HFTD area for 2020 and 2021 as shown below. (c)What were the 3 most frequent types of equipment failure in 2021? (d)What was the most frequent type of object to contact a conductor in 2021? (e)As used in Table 7.2 on p. 140, how is "other" defined?	Matthew Karle Charles Madison Carolyn Chen Layla Labagh			5/26/2022		Further to the Company's response to CalPA Data Request 7.1 dated May 25, 2022, the Company provides the following additional information responsive to subpart (b): (b)As advised in the Company's response to subpart (b) dated May 25, 2022, PacifiCorp does not currently have the data segmented in the requested manner and PacifiCorp's Subject Matter Expert (SME) is out unexpectedly for a family emergency, therefore at the time of the Company's response to CalPA Data Request 7.1, the original source file of the data was not able to be obtained. However, PacifiCorp is able to provide numbers derived from the same raw data used to generate figure 7.2 and the breakout of that data is provided in the table below: 20202021 SystemwideHFTD Tier 3HFTD Tier 2SystemwideHFTD Tier 3HFTD Tier 2 Equipment Failures3033843511394 Contact from Object181675164771			
19	CalPA	2022WMP-06	2022-WMP	2	1st Supplemental Response to CalPA Data Request 6.2	2022 WMP Update submission, and to the attached Follow-up Accident Report submitted to the CPUC regarding the Slater Fire (the "Accident Report"), dated October, 16, 2020 - This question pertains to external documents, meaning any investigation, examination, or analysis of the Slater Fire that was not performed by PacifiCorp. (a)Please provide any external investigation reports that PacifiCorp possesses regarding the Slater Fire, including but not limited to CPUC or U.S. Forest Service investigation reports. (b)Are you aware of any external investigation reports or analyses pertaining to the Slater Fire, aside from those covered by part (a) of this question? If so, please identify each such document.	Matthew Karle Miles Gordon Carolyn Chen Layla Labagh			5/31/2022		Further to the Company's response to CalAdvocates Data Request 6.2 dated May 24, 2022, the Company provides the following additional information requested for subpart (b). (b)No, PacifiCorp is not aware of any external investigation reports or analyses pertaining to the Slater Fire, aside from those covered by subpart (a) of this question.			
20	CalPA	2022WMP-08	2022-WMP	1	CalPA Data Request 8.1	2022 WMP Update submission - Does PacifiCorp consider egress risk in determining where to target system hardening programs within its California service territory?	Matthew Karle Charles Madison Carolyn Chen Layla Labagh	5/31/2022	6/3/2022	6/3/2022		Egress risk is utilized to determine prioritization of projects and which ones get undertaken first. It is not utilized when determining where to target system hardening programs and the scoping portion of that process.			
21	CalPA	2022WMP-08	2022-WMP	2	CalPA Data Request 8.2	2022 WMP Update submission - If the answer to question 1 is yes, please explain: (a)How PacifiCorp identifies locations where egress risk is important; (b)How egress risk is factored into decision making; and (c)How egress risk is weighted against other factors.	Matthew Karle Charles Madison Carolyn Chen Layla Labagh	5/31/2022	6/3/2022	6/3/2022		The Company assumes that the reference to "question 1" is intended to be a reference to "CalPA Data Request 8.1. Based on the foregoing assumption, the Company responds as follows: (a)PacifiCorp identifies locations where egress risk is important by reviewing areas where the road network in the area could be constrained in a fire. Such situations could cause the population in the area to have difficulty in attempts to leave that area. These higher risk locations would normally be areas located far from major roads, such as Interstate 5. (b)Egress risk is a contributing factor in determining prioritization. PacifiCorp utilizes the egress risk to gauge the urgency of select projects and determine which projects mitigate areas with limited egress. A higher egress risk and limitations of egress typically aligns with a higher project priority. (c)Egress risk as a factor is weighed less heavily when compared to Localized Risk Assessment Model (LRAM). LRAM prioritization is factored in first and then following that, project manager prioritization within groupings. In the project manager process, egress risk is factored in and supports the prioritization component of grid hardening projects.			
22	CalPA	2022WMP-08	2022-WMP	3	CalPA Data Request 8.3	2022 WMP Update submission (a)Does PacifiCorp maintain a list of egress-constrained communities within the HFTD? (b)If the answer to subpart (a) is yes, please provide this list.	Matthew Karle Charles Madison Carolyn Chen Layla Labagh	5/31/2022	6/3/2022	6/3/2022		(a)No. PacifiCorp does not maintain a list of egress-constrained communities within the high fire threat district (HFTD). However, egress may be considered when the company evaluates the potential for a public safety power shut-off. Along those lines, egress issues may be discussed with county and local emergency management agencies. (b)Please refer to the Company's response to subpart (a).			
23	CalPA	2022WMP-08	2022-WMP	4	CalPA Data Request 8.4	2022 WMP Update submission (a)If the answer to question 3(a) is yes, does PacifiCorp consult with local government or first responder agencies in developing this list? (b)If the answer to subpart (a) of this question is yes, please describe any such consultations that informed your 2022 WMP Update, including which agencies or stakeholders were involved and when the consultations occurred.	Matthew Karle Charles Madison Carolyn Chen Layla Labagh	5/31/2022	6/3/2022	6/3/2022		The Company assumes that the reference to "question 3(a)" is intended to be a reference to CalPA Data Request 8.3 subpart (a). Based on the foregoing assumption, the Company responds as follows: (a)Not applicable. Please refer to the Company's response to CalPA Data Request 8.3 subpart (a). (b)Please refer to the Company's response to subpart (a) above.			

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24	CalPA	2022WMP-08	2022-WMP	5	CalPA Data Request 8.5	2022 WMP Update submission - Page 100 of PacifiCorp's 2022 WMP states: "PacifiCorp will also look to leverage Technosylva's WRRM [wildfire risk reduction model] model to expand upon existing capabilities of LRAM [localized risk assessment model] and further evaluate RSE [risk-spend efficiency] and long-term planning". (a)How does PacifiCorp intend to use the WRRM model to expand on existing LRAM capabilities? (b)What is PacifiCorp's projected timeline for this expansion? (c)How does PacifiCorp intend to use the WRRM model to further evaluate RSE? (d)Does the WRRM model currently influence PacifiCorp's long-term planning? (e)How does PacifiCorp expect the WRRM model to inform and influence its long-term planning in the 2023-2025 WMP cycle?	Matthew Karle Charles Madison Carolyn Chen Layla Labagh	5/31/2022	6/3/2022	6/3/2022		(a)PacifiCorp plans to use the wildfire risk reduction model (WRRM) to update the existing wildfire-related environmental factors (surface and canopy fuels, climatology, and potential wildfire impacts) within localized risk assessment model (LRAM). (b)The priority in 2022 is the deployment of Technosylva's WRRM and create a plan for the integration/expansion with LRAM capabilities. PacifiCorp intends to complete the expansion in 2023. (c)As PacifiCorp continues to learn from other utilities through working groups and workshops, the Company is evaluating the incorporation of WRRM's environmental factors into risk-spend efficiency (RSE) to obtain better data on consequence and improve RSE's consequence risk scores. The Company expects to use the large quantity of Monte Carlo match drop simulations that Technosylva provides in order to get a much more accurate estimate of the damage from an ignition event such as buildings destroyed, and acres burned. (d)As described in PacifiCorp's 2022 Wildfire Mitigation Plan (WMP), PacifiCorp does not currently have WRRM, therefore, the WRRM does not currently influence PacifiCorp's long-term planning. The Company is in the early stages of the WRRM deployment which will be completed by the end of 2022, therefore PacifiCorp does not have outputs from the WRRM to use in its long-term planning yet. (e)Once fully implemented, PacifiCorp plans to incorporate WRRM results into RSE calculations to evaluate initiatives throughout PacifiCorp's service territory in long-term planning. PacifiCorp plans to report objective RSE values for line rebuilds and other initiatives in 2023.			
25	CalPA	2022WMP-08	2022-WMP	6	CalPA Data Request 8.6	2022 WMP Update submission - Pages 112, 113, 137, and 216 of PacifiCorp's 2022 WMP address risk-spend efficiency (RSE) estimates. Describe the methods that PacifiCorp currently uses to estimate the risk reduction benefits of wildfire mitigation initiatives (for purposes of calculating RSE) in each of the following categories: (a)Grid design and system hardening (b)Vegetation management (c)Asset management and inspections (d)Public safety power shutoffs (e)Grid operations and protocols.	Matthew Karle Charles Madison Carolyn Chen Layla Labagh	5/31/2022	6/3/2022	6/3/2022		PacifiCorp has developed a methodology to calculate risk-spend efficiency (RSE) and has estimated RSE values for a few wildfire mitigation initiatives in the grid hardening and vegetation management categories. These preliminary values utilize localized risk assessment model (LRAM) to determine ignition rates (likelihood of risk events) based on outage data as well as the Environmental Risk Score from LRAM. Note: these values were not reported in PacifiCorp's 2022 Wildfire Mitigation Plan (WMP) Update as PacifiCorp is still assessing how assumptions made and other factors influenced the generated RSE values, consequently these estimated RSE values have not been validated yet and are not being used in decision making at this time. RSE values for asset management and inspections, public safety power shutoffs (PSPS) and grid operations have not been estimated. Following the same path as larger utilities, PacifiCorp is pursuing the integration of Technosylva's wildfire risk reduction model (WRRM) layers into RSE calculations in order to refine and generate formal RSE values. PacifiCorp is currently evaluating and planning for the integration of WRRM's environmental factors into RSE in order to obtain better data on consequence and improve RSE's consequence risk scores. This integration is planned to be completed in 2023 which will enable PacifiCorp to generate objective RSE values for covered conductor. As stated in PacifiCorp's 2022 WMP, page 113, PacifiCorp will update and include other RSE calculations in its 2024 WMP Update.			
26	CalPA	2022WMP-08	2022-WMP	7	CalPA Data Request 8.7	2022 WMP Update submission - Please provide any available work papers substantiating PacifiCorp's RSE calculations for grid design and system hardening programs.	Matthew Karle Charles Madison Carolyn Chen Layla Labagh	5/31/2022	6/3/2022	6/3/2022		Please refer to Attachment CalAdvocates 8.7. Note: this is a draft document as PacifiCorp continues to evaluate its risk-spend efficiency (RSE) calculations.	1	Attachment CalPA 8.7	
27	CalPA	2022WMP-09	2022-WMP	1	CalPA Data Request 9.1	Regarding WMP initiative #7.3.4.15 (Substation Inspections): On Page 182, PacifiCorp states that "substations are inspected eight times per year. Over the course of 2022, the goal is to complete 444 inspections." PacifiCorp reports performing two types of inspections on substations: Substation Inspection (including InfraRed) and Substation & Security Inspections. According to Table 8 (2021 non-spatial data file, columns AC, AD, AE, and AF), PacifiCorp has 67 substations. (a)Please explain how all the substations are inspected at least eight times per year if only 438 inspections were completed in 2021. (b)If some scheduled substation inspections were not completed in 2021, please explain why. (c)Please explain the difference between Substation Inspections (including InfraRed) and Substation & Security Inspections. (d)What is PacifiCorp's normal frequency for Substation Inspections (including InfraRed)? If this varies by HFTD tier, please state the frequency for each HFTD tier. (e)What is PacifiCorp's normal frequency for Substation & Security Inspections? If this varies by HFTD tier, please state the frequency for each HFTD tier. (f)Please provide a copy of five of the most recently completed Substation Inspections (including InfraRed).	Matthew Karle Charles Madison Carolyn Chen Layla Labagh	6/1/2022	6/6/2022	6/6/2022		(a)Substation Inspections have a call schedule (the start date a work order is released in SAP). The work order has to be released for the inspection to occur. This Call Schedule for substation inspections releases eight work orders per year to allow for a minimum of inspections to be consistent with Policy 001 - PacifiCorp's Maintenance Intervals for Apparatus, Relays, Meters, and Line/Patrol Inspection and Communications Equipment. The number of substations initially reported (67) includes hydroelectric plants, duplicates that occur due to substation being considered a transmission and distribution facility, and future substation (Lassen). These substations are not included in the total substations to be inspected eight times per year since they are inspected by a different organization (not transmission and distribution operations). The total number of substations that are inspected per year without these substations is 55. i.55 California substations inspected for a total of 444 inspections per year. ii.54 non Western Electricity Coordinating Council (WECC) substations at eight per year = 432 (WECC FAC-501 Standard) iii.1 WECC substation at 12/year = 12 Please refer to Attachment CalPA 9.1-1 which provides a copy of Policy 001 - PacifiCorp's Maintenance Intervals for Apparatus, Relays, Meters, and Line/Patrol Inspection and Communications Equipment. (b)All 444 scheduled substation inspections were completed in 2021. In some instances, the number of scheduled substation inspections can appear not completed due to documentation not being filed with the work order. If a work order does not have the documentation associated with it, the outstanding work order is investigated, and the proper documentation is retrieved to complete the work order. Please refer to Attachment CalPA 9.1-2 and Attachment CalPA 9.1-3 which provide documentation regarding the missing	5	Attachment CalPA 9.1-1 Attachment CalPA 9.1-2 Attachment CalPA 9.1-3 Attachment CalPA 9.1-4 Attachment CalPA 9.1-5	

Please provide a copy of five of the most recently completed Substation & Security

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28	CalPA	2022WMP-09	2022-WMP	2	CalPA Data Request 9.2	Table 12 of the Non-Spatial Data File included with PacifiCorp's 2022 WMP update refers to WMP initiative #7.3.4.14 (Quality Assurance and Quality Control of inspection). With this context in mind, (a)Please provide a unit of measurement for the 11,485 in column AN. (b)Please provide projected values for 2022 and 2023. (c)Please provide a copy of the Quality Assurance/Quality Control procedure/program documentation related to asset management and inspections.	Matthew Karle Charles Madison Carolyn Chen Layla Labagh	6/1/2022	6/6/2022	6/6/2022		(a)In the PacifiCorp 2021 California Wildfire Mitigation Plan (WMP) Update, Section 7.3.4.14, page 153-154, there are a variety of quality assurance (QA) / quality control (QC) processes which occur; physical audits, software controls, quarterly desktop reviews and annual training. The 11,485 in column AN, describes the number of inspections reviewed as part of the quarterly desktop reviews, where the entirety of QA/QC inspection conditions found are reviewed with a cross functional team. Therefore, the units of AN is the number of inspections audited as part of the desktop review of all inspections. (b)In the future, PacifiCorp plans to transition the QA/QC numbers reported to align with the physical audits described in Policy 123 - Facility Inspection Audit Policy for Transmission and Distribution Lines for California, Oregon and Washington. Therefore, the projected number of QA/QC physical audits for 2022 and 2023 are 1,010 and 1,010, respectively. (c)For physical audits, Policy 123 - Facility Inspection Audit Policy for Transmission and Distribution Lines for California, Oregon and Washington is Pacific Power's audit policy for transmission and distribution lines in California, Oregon, and Washington. Please refer to Attachment CalPA 9.2 which provides a copy of Policy 123 - Facility Inspection Audit Policy for Transmission and Distribution Lines for California, Oregon and Washington.	1	Attachment CalPA 9.2	
29	CalPA	2022WMP-09	2022-WMP	3	CalPA Data Request 9.3	Regarding PacifiCorp's response to Cal Advocates data request CalAdvocates-PacifiCorp-2022WMP-02, Question 1, "Audit Summary (CA) (2021)" excel file: (a)Please define columns M through R of this excel sheet. (b)Please explain what is required for an inspection to pass or fail, per column L "Fail / Pass". (c)Please explain what subsequent action PacifiCorp takes when a value is filled in for Column M "Add". (d)Please explain what subsequent action PacifiCorp takes when a value is filled in for Column N "Rem". (e)Please explain what subsequent action PacifiCorp takes when a value is filled in for Column O "Pri". (f)What follow-up actions were performed as a result of the audits listed in this excel file (e.g., a new work order was generated if a new deficiency was found, or a work order was modified if a deficiency was determined to be less of an impact, etc.)?	Matthew Karle Charles Madison Carolyn Chen Layla Labagh	6/1/2022	6/6/2022	6/6/2022		In addition to the responses to subparts (a) through (f) provided below, PacifiCorp would like to offer to meet with representatives of the California Public Advocates Office to walk through the audit summary provided below. (a)These are the different types of tracked changes that are made during the audits. (b)In an urban section, PacifiCorp requires 90 percent or better and in rural sections, PacifiCorp requires 80 percent or better for the section to pass. If it does not meet this metric, then it will be a Fail and require some type of reinspection depending on the reasons for the failure. (c)Column M correlates to the number of added conditions made by the auditor during the audit. (d)Column N correlates to the number of removed conditions made by the auditor during the audit that are deemed not a condition. (e)Column O correlates to the number of changes to the level of priority to the conditions made by the auditor during the audit. (f)If a section has failed an audit, depending on the reason for the failed audit, a reinspection will occur. Once a reinspection is completed, an audit from both the Osmose QC team and Pacific Power audit team will reinspect the section before it is passed. A desktop audit is always in line with the field audits and will usually drive the field audit. This is a high-level overview of the overall data delivered to Pacific Power from the inspection contractor. The Company further evaluate the data for anomalies and check for patterns. Any issues found in the desktop audit will result in a field visit to determine the outcome of the condition.			
30	CalPA	2022WMP-09	2022-WMP	5	CalPA Data Request 9.5	Regarding PacifiCorp's response to Cal Advocates data request CalAdvocates-PacifiCorp-2022WMP-04, Question 1 response, "Audit Summary (CA)(2022Q1)" excel file: What follow-up actions were performed because of the audits listed in this excel file (e.g., a new work order was generated if a new deficiency was found, or a work order was modified if a deficiency was determined to be less of an impact, etc.)?	Matthew Karle Charles Madison Carolyn Chen Layla Labagh	6/1/2022	6/6/2022	6/6/2022		The conditions found in the audit are fielded by a lineman for correction. If the lineman deems the conditions not valid the condition is removed. If the condition is valid, then it is repaired or setup to be corrected. In some cases, the lineman may choose to change the level or priority to a higher or lower priority depending on what is found. This would then change the timeframe for correction based on Company guidelines.			
31	CalPA	2022WMP-09	2022-WMP	6	CalPA Data Request 9.6	Regarding 7.3.4.2 (Detailed inspections of transmission electric lines and equipment): (a)Please explain why the annual total cost of inspections, presented in Table 1 below, fluctuates during years 2021 – 2023 while the number of inspections performed increases each year. (b)Please explain the decrease in the unit cost of inspections from the 2021 proposed figures to the 2021 actual figure. (c)Please explain the expected decrease in the unit cost of inspections from 2021 actual figures to 2022 projections. Table 1. Side-by-side of Detailed transmission inspections performed and associated costs. (Source: Table 12 of non-spatial data) YearNumber of InspectionsCosts 2021 (Proposed)666\$27,808 2021 (Actual)1,439\$27,000 2022 (Projected)2,545\$9,000 2023 (Projected)2,738\$18,000	Matthew Karle Charles Madison Carolyn Chen Layla Labagh	6/1/2022	6/6/2022	6/6/2022		(a)The values provided in Table 1 initially were incorrect. Please refer to the table below which shows actual and proposed unit costs: YearNumber of InspectionsCostsPer Unit Cost 2021 (Proposal)666\$ 10,675\$ 16.03 2021 (Actual)722\$ 14,700\$ 20.36 2022 (Projected)918\$ 10,143\$ 11.05 2023 (Projected)2,676\$ 54,044\$ 20.20 The total cost fluctuates with the volume of inspections completed, proposed, or projected. Inspection volumes fluctuate from year-to-year based on each assets prescribed five-year interval. Unit cost can vary depending on contractor pricing, material costs (Pole Test & Treat inspections), and time to inspect (based on travel time and structure complexity). PacifiCorp tracks these items and can provide on an as-needed basis. (b)Please refer to the table provided above which shows actual and proposed unit costs in alignment. (c)The decrease in projected unit cost for 2022 is the result of a formula error and has since been updated. The revised expectation for 2022 is in-line with historical spend.			

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32	CalPA	2022WMP-09	2022-WMP	7	CalPA Data Request 9.7	Table 12 of the Non-Spatial Data File included with PacifiCorp's 2022 WMP update refers to WMP initiative #7.3.4.1 (Detailed inspections on electric distribution equipment and line). (a)Please provide the actual number of circuit miles inspected in this initiative each year from 2019 – 2021. (b)Provide PacifiCorp's current forecast of the number of circuit miles to be inspected in 2022. (c)Provide PacifiCorp's current forecast of the number of circuit miles to be inspected in 2023.	Matthew Karle Charles Madison Carolyn Chen Layla Labagh	6/1/2022	6/6/2022	6/6/2022		PacifiCorp plans, tracks, and reports inspections and corrections per facility point as opposed to per line mile. However, equivalent inspection miles were extrapolated in years 2015-2022 assuming little to no changes in grid topology. While these values reflect best estimates or equivalent line-miles, slight difference may exist when comparing to other data sets, such as the quarterly data report (QDR) or spatial data. Furthermore, the evolution of PacifiCorp's electronic database requires extrapolation when determining condition findings per inspection type. However, PacifiCorp's programmatic inspection results were generally extrapolated and categorized as either "Detailed" or "Safety" inspection results. (a)PacifiCorp typically tracks this initiative by Facility Point and not by miles, however an algorithm can be used to estimate the number of line miles associated with a typical spread of Facility Points. The number of circuit miles inspected each year for distribution detail inspections is provided below: 2019: 475 circuit miles 2020: 604 circuit miles 2021: 563 circuit miles Note: these are estimated values. (b)PacifiCorp typically tracks this initiative by Facility Point and not by miles, however an algorithm can be used to estimate the number of line miles associated with a typical spread of Facility Points. The current forecast estimate is approximately 536 circuit miles for distribution detailed inspections in 2022. (c)PacifiCorp typically tracks this initiative by Facility Point and not by miles, however an algorithm can be used to estimate the number of line miles associated with a typical spread of Facility Points. The current forecast estimate is approximately 527 circuit miles for distribution detailed inspections in 2023.			
33	CalPA	2022WMP-09	2022-WMP	8	CalPA Data Request 9.8	Table 12 of the Non-Spatial Data File included with PacifiCorp's 2022 WMP update refers to WMP initiative #7.3.4.2 (Detailed inspections on electric transmission equipment and line). (a)Please provide the actual number of circuit miles inspected in this initiative each year from 2019 – 2021. (b)Provide PacifiCorp's current forecast of the number of circuit miles to be inspected in 2022. (c)Provide PacifiCorp's current forecast of the number of circuit miles to be inspected in 2023.	Matthew Karle Charles Madison Carolyn Chen Layla Labagh	6/1/2022	6/6/2022	6/6/2022		PacifiCorp plans, tracks, and reports inspections and corrections per facility point as opposed to per line mile. However, equivalent inspection miles were extrapolated in years 2015-2022 assuming little to no changes in grid topology. While these values reflect best estimates or equivalent line-miles, slight difference may exist when comparing to other data sets, such as the quarterly data report (QDR) or spatial data. Furthermore, the evolution of PacifiCorp's electronic database requires extrapolation when determining condition findings per inspection type. However, PacifiCorp's programmatic inspection results were generally extrapolated and categorized as either "Detailed" or "Safety" inspection results. (a)PacifiCorp typically tracks this initiative by Facility Point and not by miles, however an algorithm can be used to estimate the number of line miles associated with a typical spread of Facility Points. The estimated number of circuit miles inspected each year for transmission detail inspections is provided below: 2019: 62 circuit miles 2020: 225 circuit miles 2021: 452 circuit miles Note: these are estimated values. (b)PacifiCorp typically tracks this initiative by Facility Point and not by miles, however an algorithm can be used to estimate the number of line miles associated with a typical spread of Facility Points. The current forecast estimate is approximately 799 circuit miles for transmission detailed inspections in 2022. (c)PacifiCorp typically tracks this initiative by Facility Point and not by miles, however an algorithm can be used to estimate the number of line miles associated with a typical spread of Facility Points. The current forecast estimate is approximately 860 circuit miles for transmission detailed inspections in 2023.			

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34	CalPA	2022WMP-09	2022-WMP	9	CalPA Data Request 9.9	Table 12 of the Non-Spatial Data File included with PacifiCorp's 2022 WMP update refers to WMP initiative #7.3.4.11 (Patrol inspections on electric distribution equipment and line). (a)Please provide the actual number of circuit miles inspected in this initiative each year from 2019 – 2021. (b)Provide PacifiCorp's current forecast of the number of circuit miles to be inspected in 2022. (c)Provide PacifiCorp's current forecast of the number of circuit miles to be inspected in 2023.	Matthew Karle Charles Madison Carolyn Chen Layla Labagh	6/1/2022	6/6/2022	6/6/2022		PacifiCorp plans, tracks, and reports inspections and corrections per facility point as opposed to per line mile. However, equivalent inspection miles were extrapolated in years 2015-2022 assuming little to no changes in grid topology. While these values reflect best estimates or equivalent line-miles, slight difference may exist when comparing to other data sets, such as the quarterly data report (QDR) or spatial data. Furthermore, the evolution of PacifiCorp's electronic database requires extrapolation when determining condition findings per inspection type. However, PacifiCorp's programmatic inspection results were generally extrapolated and categorized as either "Detailed" or "Safety" inspection results. (a)PacifiCorp typically tracks this initiative by Facility Point and not by miles, however an algorithm can be used to estimate the number of line miles associated with a typical spread of Facility Points. The number of circuit miles inspected each year for distribution patrol inspections is provided below: 2019: 2,140 circuit miles 2020: 1,944 circuit miles 2021: 2,172 circuit miles Note: these are estimated values. (b)PacifiCorp typically tracks this initiative by Facility Point and not by miles, however an algorithm can be used to estimate the number of line miles associated with a typical spread of Facility Points. The current forecast estimate is approximately 1,986 circuit miles for distribution patrol inspections in 2022. (c)PacifiCorp typically tracks this initiative by Facility Point and not by miles, however an algorithm can be used to estimate the number of line miles associated with a typical spread of Facility Points. The current forecast estimate is approximately 2,167 circuit miles for distribution patrol inspections in 2023.			
35	CalPA	2022WMP-09	2022-WMP	10	CalPA Data Request 9.10	Table 12 of the Non-Spatial Data File included with PacifiCorp's 2022 WMP update refers to WMP initiative #7.3.4.12 (Patrol inspections on electric transmission equipment and line). (a)Please provide the actual number of circuit miles inspected in this initiative each year from 2019 – 2021. (b)Provide PacifiCorp's current forecast of the number of circuit miles to be inspected in 2022. (c)Provide PacifiCorp's current forecast of the number of circuit miles to be inspected in 2023.	Matthew Karle Charles Madison Carolyn Chen Layla Labagh	6/1/2022	6/6/2022	6/6/2022		PacifiCorp plans, tracks, and reports inspections and corrections per facility point as opposed to per line mile. However, equivalent inspection miles were extrapolated in years 2015-2022 assuming little to no changes in grid topology. While these values reflect best estimates or equivalent line-miles, slight differences may exist when comparing to other data sets, such as the quarterly data reporting (QDR) or spatial data. Furthermore, the evolution of PacifiCorp's electronic database requires extrapolation when determining condition findings per inspection type. However, PacifiCorp's programmatic inspection results were generally extrapolated and categorized as either "Detailed" or "Safety" inspection results. (a)PacifiCorp typically tracks this initiative by Facility Point and not by miles, however an algorithm can be used to estimate the number of line miles associated with a typical spread of Facility Points. The number of circuit miles inspected each year for transmission patrol inspections is provided below: 2019: 766 circuit miles 2020: 766 circuit miles 2021: 1,063 circuit miles (b)PacifiCorp typically tracks this initiative by Facility Point and not by miles, however an algorithm can be used to estimate the number of line miles associated with a typical spread of Facility Points. The current forecast estimate is approximately 1,058 circuit miles for transmission patrol inspections in 2022. (c)PacifiCorp typically tracks this initiative by Facility Point and not by miles, however an algorithm can be used to estimate the number of line miles associated with a typical spread of Facility Points. The current forecast estimate is approximately 1,057 circuit miles for transmission patrol inspections in 2023.			
36	CalPA	2022WMP-09	2022-WMP	11	CalPA Data Request 9.11	Table 12 of the Non-Spatial Data File included with PacifiCorp's 2022 WMP update, refers to WMP initiative #7.3.4.5 (Infrared inspections of transmission electric lines and equipment). With that context in mind: (a)Please explain why the actual cost of this initiative for 2021 is exactly \$80,000. (b)Please explain why the actual output of this initiative for 2021 is exactly 700 circuit miles. (c)Please explain why the projected cost estimated for both 2022 and 2023 is exactly \$80,000. (d)Please explain why the projected output of this initiative for both 2022 and 2023 is exactly 700 circuit miles.	Matthew Karle Charles Madison Carolyn Chen Layla Labagh	6/1/2022	6/6/2022	6/6/2022		(a)The actual cost of the inspections for 2021 was \$79,315, and will be updated in Table 12. (b)The actual miles inspected were 701.22 miles. Each transmission line has an equipment number and details of the line are maintained in SAP. The transmission lines also have geographic information system (GIS) data that can be pulled to get distances. Depending on where the transmission line data is gathered the total mileage could be off by a small margin (+/- five miles). The actual line mileage when pulling data from our Facility Point Inspection tool which is the Company's official record of inspections and corrections shows the mileage of those lines to be 701.22 miles. (c)The scope for inspections is currently planned to remain the same and the cost is estimated to be very similar to the previous year's inspections. The cost is based on the helicopter rates therefore the actual cost may vary depending on price of fuel, weather, and other contributing factors. The \$80,000 will remain as the projected cost for the inspections. (d)The scope for the lines inspected are all the transmission lines in California. The transmission lines total 701.22 miles.			

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37	CalPA	2022WMP-09	2022-WMP	12	CalPA Data Request 9.12	On average, how many person-hours of labor does it take PacifiCorp to complete one asset inspection in each of the following initiatives: (a)Detailed Inspections - Distribution (b)Detailed Inspections - Transmission (c)Patrol Inspections - Distribution (d)Patrol Inspections - Transmission	Matthew Karle Charles Madison Carolyn Chen Layla Labagh	6/1/2022	6/6/2022	6/6/2022		(a)Depending on the number of facility points in each section, the external contractor will complete roughly 200 to 300 inspections in a 40-hour work week or approximately eight to 12 minutes per inspection. This will vary depending on access availability to the facility point. (b)Depending on the amount of facility points in each section, the external contractor will complete roughly 100 to 200 inspections in a 40-hour work week or approximately 12 to 24 minutes per inspection. This will vary depending on access availability to the facility point. (c)Depending on access and issues observed, 500 to 1,000 inspections are completed in a 40-hour work week or approximately three to five minutes per inspection. (d)Depending on access, issues observed, and transmission road conditions 100 to 200 inspections are completed in a 40-hour work week or approximately 12 to 24 minutes per inspection.			
38	CalPA	2022WMP-09	2022-WMP	13	CalPA Data Request 9.13	Please provide the results of all 2021 pole loading assessments that PacifiCorp performed in HFTD areas	Matthew Karle Charles Madison Carolyn Chen Layla Labagh	6/1/2022	6/6/2022	6/6/2022		Please refer to Attachment CalPA 9.13. The provided Light Detection And Ranging (LiDAR) Pole Strength Pilot summary provides the engineering analysis performed by integrating the LiDAR data into PLSCADD and running different strength simulations. Risk levels mentioned in column O were assigned based on elevation and comparisons to the Grade A and Grade B requirements. A high-risk pole is not a priority A failure and is closer to a priority B failure. Recommendations were given for the type of correction based on the risk and loading variables. Column P mentions that the poles are not part of the Wildfire Mitigation Plan (WMP) proactive pole replacement program, but a majority of the poles are being replaced through the current line rebuild projects.	1	Attachment CalPA 9.13	
39	CalPA	2022WMP-10	2022-WMP	1	CalPA Data Request 10.1	2022 Wildfire Mitigation Plan (WMP) Update submission - As of June 1, 2022, how many open corrective notifications does PacifiCorp have on distribution assets within the HFTD? Provide the total, and disaggregate the total by priority level and HFTD tier.	Matthew Karle Charles Madison Carolyn Chen Layla Labagh	6/2/2022	6/7/2022	6/7/2022		Please refer to the table below which provides the total outstanding conditions as of June 3, 2022 for distribution assets broken out by risk area and includes all conditions as per internal procedure 069 which include General Order (GO) 95 conditions. Condition counts are based only on ones that PacifiCorp has a responsibility to correct and it does not include conditions found for communications equipment: PRIORITY CA-TIER-2 CA-TIER-3 HFTD Overhead A 13 1 14 Overhead B 3,820 337 4,157 Overhead C 12,122 532 12,654 Underground A 0 0 0 Underground B 50 18 68 Underground C 96 14 110 17,003			
40	CalPA	2022WMP-10	2022-WMP	2	CalPA Data Request 10.2	2022 Wildfire Mitigation Plan (WMP) Update submission - As of June 1, 2022, how many open corrective notifications does PacifiCorp have on distribution assets within the HFTD that have remediation deadlines in 2021 or earlier? Provide the total, and disaggregate the total by priority level and HFTD tier.	Matthew Karle Charles Madison Carolyn Chen Layla Labagh	6/2/2022	6/7/2022	6/7/2022		Please refer to the table below which provides the total outstanding conditions on or before December 31, 2021 for distribution assets broken out by risk area. Note: condition counts are based only on ones that PacifiCorp has a responsibility to correct and it does not include conditions found for communications equipment: PRIORITY CA-TIER-2 CA-TIER-3 HFTD Overhead A 0 0 0 Overhead B 219 2 221 Overhead C 8,421 324 8,745 Underground A 0 0 0 Underground B 6 1 7 Underground C 45 2 47 9,020			
41	CalPA	2022WMP-10	2022-WMP	3	CalPA Data Request 10.3	2022 Wildfire Mitigation Plan (WMP) Update submission - Where is PacifiCorp's Emergency Operations Center (EOC) located when PacifiCorp initiates a PPS event in its California service territory?	Matthew Karle Charles Madison Carolyn Chen Layla Labagh	6/2/2022	6/7/2022	6/7/2022		PacifiCorp's base of operations during system events is located in Portland, Oregon; alternate locations are available throughout the six-state service territory should it become necessary. During system events, constant communication is maintained with regional service and operations centers, local regional business managers, and regional public safety partners.			

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42	CalPA	2022WMP-10	2022-WMP	4	CalPA Data Request 10.4	2022 Wildfire Mitigation Plan (WMP) Update submission - PacifiCorp is required to list the names of all entities invited to its EOC during a PSPS event, the method used to make this invitation, and whether a different form of communication was preferred by any entity invited to its EOC (D.21-06-014). In its August 2021 PSPS event, PacifiCorp states that it did not invite any other entities to its EOC. Please respond to the following: (a)How does PacifiCorp determine whether to invite local and state public safety partners or any other entities to its EOC during a PSPS event? (b)Why didn't PacifiCorp invite any other entities to its EOC for its August 2021 PSPS event? (c)If PacifiCorp's EOC for managing PSPS events is not located in California, describe how PacifiCorp balances the need for public safety partners to participate in its EOC against the distance those public safety partners would have to travel from the affected area to PacifiCorp's EOC.	Matthew Karle Charles Madison Carolyn Chen Layla Labagh	6/2/2022	6/7/2022	6/7/2022		(a)It is not standard practice for PacifiCorp to include public safety partners in the internal activities of the Emergency Coordination Center (ECC). Consistent communication is maintained with external organizations including public safety partners, regional emergency management, tribal organizations, and other entities as appropriate. (b)The ECC is staffed by a specialty group of company representatives who assemble during system events to provide critical internal support to operational resources. In the course of its work, the ECC makes decisions to maintain the safety of its customers and reliability of the transmission and distribution system. PacifiCorp maintained constant contact with public safety partners throughout the 2021 Public Safety Power Shutoff (PSPS) event to provide updates and collect feedback as appropriate; regular participation in ECC conversations was not appropriate for the circumstance. (c)PacifiCorp relies on the strength of relationships established by the Emergency Coordination Center staff in the communities it serves. PacifiCorp emergency management similarly has continual communication with public safety partners and ensures communications during system events. These relationships and the communications processes have been solidified through various planning coordination events, exercises and actual incident responses to prove they are not only effective but are also streamlined in the event of ECC activation.			
43	CalPA	2022WMP-10	2022-WMP	5	CalPA Data Request 10.5	2022 Wildfire Mitigation Plan (WMP) Update submission - On pages 255-256 of its 2022 WMP, PacifiCorp states: To address [challenges scaling covered conductor installations], PacifiCorp is planning to engage a construction management partner through a competitive bidding process in 2022. This new contracted partner is expected to facilitate delivery of the various aspects of covered conductor projects, such as project management, project controls, project reporting, engineering, estimating, permitting, surveying, material procurement, material management, construction, and post construction inspections. PacifiCorp anticipates that the new contracted partner will begin supporting the delivery of covered conductor in late 2022 or early 2023. Regarding this construction management partner: (a)Please provide the scope of work for PacifiCorp's construction management partner. (b)Will the construction management partner focus exclusively on covered conductor installation projects, or will the contract also cover other construction projects? (c)What is the expected duration of the contract for the construction management partner? (d)Does PacifiCorp intend to rely on a contractor for construction management support as a long-term arrangement, or does PacifiCorp intend to build these capabilities in house?	Matthew Karle Charles Madison Carolyn Chen Layla Labagh	6/2/2022	6/7/2022	6/7/2022		(a)Please refer to the Company's response below which lists the scope of work for PacifiCorp's construction management partner: •Line rebuild to replace the overhead primary voltage bare conductor distribution systems and rebuild options to convert existing overhead primary voltage distribution circuits to tree wire or underground installations. •Advanced protection and control to add or replace existing mechanical/antiquated relays and fluid insulated circuit breakers for transmission and distribution assets. Also, it may include updates to existing substation communication capabilities. •Pole mounted overcurrent and overvoltage equipment replacements of overhead expulsion type fuses and lightning arrestors. •Recloser installs or replacements of existing overhead hydraulic or other antiquated reclosers and controllers with up-to-date and advanced equipment. Additionally, PacifiCorp has provided the RFI (request for information) document which includes additional information on the scope of the future construction management partner: Please refer to Attachment Cal PA 10.5 for the Wildfire Mitigation Project Delivery RFI (No Cap Incl) (b)PacifiCorp's construction management partner will also focus on other projects such as install/replacement of relays, pole mounted equipment, and reclosers. Please refer to the Company's response to subpart (a) above for additional detail.	Attachment CalPA 10.5		
44	CalPA	2022WMP-11	2022-WMP	1	CalPA Data Request 11.1	2022 WMP Update submission, and to the attached Follow-up Accident Report submitted to the CPUC regarding the Slater Fire (the "Accident Report"), dated October, 16, 2020. If the responses include privileged information or legal analysis or conclusions as well as technical and policy conclusions, please provide a version with the privileged and legal analysis/conclusions redacted. The Accident Report states that "Pacifi Power is conducting a full investigation of the cause and origin of the fire". (a)What kinds of investigations has PacifiCorp conducted into the cause and origin of the Slater Fire? (b)Has PacifiCorp conducted a root cause analysis of the Slater Fire? (c)Please include all documentation relating to technical and policy conclusions from the analyses and investigations discussed in parts (a) and (b) above. If the responsive documents include legal analysis or conclusions as well as technical and policy conclusions, please provide a version with the legal analysis/conclusions redacted.	Matthew Karle Charles Madison Carolyn Chen Layla Labagh	6/2/2022	6/7/2022	6/7/2022		The expected duration of the contract for the construction management partner will be 18 months, or until the end of the calendar year 2023. The information provided in this response is confidential and is provided to you in confidence, with attorney-client privilege and the attorney work product doctrine; there is pending litigation related to the Slater Fire. Subject to objections, PacifiCorp responds as follows: on September 8, 2020, PacifiCorp's Office of General Counsel initiated a confidential and privileged investigation regarding the cause and origin of the Slater Fire. The privileged investigation was initiated and conducted to aid PacifiCorp's counsel with the provision of legal advice in connection with current and/or anticipated litigation and to prepare for trial, and is, therefore, conducted under the attorney-client privilege and protected by the attorney work product doctrine. PacifiCorp employees operating under the supervision and direction of counsel, including PacifiCorp engineers, foresters, and line personnel, have confidentially assisted PacifiCorp's Office of General Counsel and PacifiCorp's outside litigation counsel with the privileged investigation. PacifiCorp's Office of General Counsel and PacifiCorp's outside litigation counsel have also consulted with retained experts. PacifiCorp's outside counsel, in-house counsel, claims investigators, and subject matter experts have spent considerable time and expense conducting PacifiCorp's investigation into the cause and origin of the Slater Fire. Litigation regarding the Slater Fire is ongoing, and the privileged investigation continues to this day. PacifiCorp's legal team is not typically involved in PacifiCorp's investigations into the cause and origin of powerline-adjacent fires unless litigation is expected. When litigation is expected, as here, a primary purpose of the investigation is to assist counsel in preparing for trial. The only analysis of the cause and origin of the Slater Fire that PacifiCorp has conducted has been through its privileged investigation. For certain incidents, PacifiCorp employees may be involved in an analysis to determine whether electric facilities were involved in any fire ignition. Because of the immediate threat of litigation with respect to the Slater Fire, however, this type of analysis did not occur with respect to the Slater Fire. Instead, PacifiCorp's Office of General Counsel immediately initiated the investigation in anticipation of litigation. Providing responses to the above questions would reveal information regarding PacifiCorp's privileged investigation. PacifiCorp also objects that these questions are duplicative of CalPA Data Request Set 6. PacifiCorp intends to provide supplemental responses to CalPA Data Request Set 6, questions 1 through 4 which overlap substantively with these questions.			

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45	CalPA	2022WMP-11	2022-WMP	2	CalPA Data Request 11.2	2022 WMP Update submission, and to the attached Follow-up Accident Report submitted to the CPUC regarding the Slater Fire (the "Accident Report"), dated October, 16, 2020. If the responses include privileged information or legal analysis or conclusions as well as technical and policy conclusions, please provide a version with the privileged and legal analysis/conclusions redacted. (a)Did PacifiCorp personnel (such as a trouble-person) respond to the ignition of the Slater Fire by visiting the scene of this incident within 48 hours of the ignition? (b)If the answer to part (a) is yes, please identify the job title(s) of each person who responded to the incident. (c)If the answer to part (a) is yes, what did the PacifiCorp personnel who responded conclude about how and where the fire ignited? (d)If the answer to part (a) is no, please explain why not.	Matthew Karle Charles Madison Carolyn Chen Layla Labagh	6/2/2022	6/7/2022	6/7/2022		(a)PacifiCorp objects that the "scene of the incident" is ambiguous and not defined. PacifiCorp will interpret the "scene of the incident" to mean the area under investigation by the investigating agency, United States Forest Service (USFS), at the span between Pole Nos. 135300 and 136300 on Circuit 5G16. Subject to this interpretation, PacifiCorp responds as follows: PacifiCorp was not allowed to access the scene of the incident by USFS in the first 48 hours after the fire, though PacifiCorp notes that on the morning of September 8, 2020, PacifiCorp Serviceman Randy Zink responded to the fire by manually opening a fuse at Pole No. 143300 on the tap line referenced in the Company's response to CalPA Data Request 11.4 subpart (a). (b)PacifiCorp Serviceman Randy Zink. (c)Not applicable as USFS restricted access to the scene of the incident. (d)USFS prohibited access to the scene of the incident until September 15, 2020, when PacifiCorp's field operations was granted limited access to the area in order to conduct repairs.			
46	CalPA	2022WMP-11	2022-WMP	3	CalPA Data Request 11.3	2022 WMP Update submission, and to the attached Follow-up Accident Report submitted to the CPUC regarding the Slater Fire (the "Accident Report"), dated October, 16, 2020. If the responses include privileged information or legal analysis or conclusions as well as technical and policy conclusions, please provide a version with the privileged and legal analysis/conclusions redacted. (a)Did PacifiCorp perform an engineering analysis to determine the causes of the Slater Fire? (b)If the answer to part (a) is yes, what were the conclusions of this analysis?	Matthew Karle Charles Madison Carolyn Chen Layla Labagh	6/2/2022	6/7/2022	6/7/2022		Please refer to the Company's response to CalPA Data Request 11.1.			
47	CalPA	2022WMP-11	2022-WMP	4	CalPA Data Request 11.4	2022 WMP Update submission, and to the attached Follow-up Accident Report submitted to the CPUC regarding the Slater Fire (the "Accident Report"), dated October, 16, 2020. If the responses include privileged information or legal analysis or conclusions as well as technical and policy conclusions, please provide a version with the privileged and legal analysis/conclusions redacted. (a)Please identify the circuit and circuit-segment nearest to the location where the Slater Fire started. (b)Please state when the above-identified circuit segment had been last subject to a vegetation management inspection prior to the Slater Fire. (c)Please provide any vegetation corrective notifications identified by as part of the most recent vegetation management inspections conducted prior to the Slater Fire. (d)Please state when you last performed vegetation management work (i.e., tree trimming or removal) on the above-identified circuit segment prior to the Slater Fire. (e)Please state when the above-identified circuit segment had been last subject to detailed asset inspections prior to the Slater Fire. (f)Please provide any asset maintenance corrective notifications identified as part of the most recent asset management inspections conducted prior to the Slater Fire. (g)At the time the ignition occurred, was the above-identified circuit segment scoped for inclusion in any system hardening programs in PacifiCorp's 2020 Wildfire	Matthew Karle Charles Madison Carolyn Chen Layla Labagh	6/2/2022	6/7/2022	6/7/2022		(a)The precise location of the Slater Fire's ignition remains under investigation. PacifiCorp understands that the United States Forest Service (USFS) focused its investigation on a tap line on Circuit 5G16 that terminates in the USFS Slater Butte lookout tower, and more specifically, the span between Pole Nos. 135300 and 136300. (b)Based on a reasonable investigation, a vegetation management audit of the tap line was performed on or about September 3, 2020. Copies of the five most recent vegetation management patrol inspections conducted on Circuit 5G16 were produced to the California Public Utility Commission (CPUC) Safety and Enforcement Division (SED) with Bates numbers PC-SED-SLATER000000033 to PC-SED-SLATER0000000313. Documents reflecting vegetation management records for Circuit 5G16 for the last five years were produced to the CPUC SED with Bates numbers PC-SED-SLATER000001243 to PC-SED-SLATER000001933. (c)PacifiCorp objects that the question is overbroad, unduly burdensome, and ambiguous as it is not limited to the subject span. To the extent information is requested regarding the subject span, please refer to the Company's response to subpart (b) above. (d)Based on a reasonable investigation, a PacifiCorp contractor completed vegetation management work at the tap line on or about July 1, 2020. Please also refer to the Company's response to subpart (b) above (e)Please refer to the Company's response below: 1. When an asset inspection associated with PacifiCorp's inspection and correction programs is performed on a PacifiCorp facility, an inspection record is created in the Facility Point Inspection (FPI) system, the PacifiCorp's system of record for overhead and underground facilities. PacifiCorp uses the following convention and meaning when creating inspection records of different types: SAFETY: An inspection record indicative of performing a safety inspection, also referred to as a patrol or visual			
48	CalPA	2022WMP-11	2022-WMP	5	CalPA Data Request 11.5	2022 WMP Update submission, and to the attached Follow-up Accident Report submitted to the CPUC regarding the Slater Fire (the "Accident Report"), dated October, 16, 2020. If the responses include privileged information or legal analysis or conclusions as well as technical and policy conclusions, please provide a version with the privileged and legal analysis/conclusions redacted. (a)Based on PacifiCorp's experience with the Slater Fire, what have PacifiCorp's subject matter experts and engineers learned about safely operating PacifiCorp's system? (b)Based on PacifiCorp's experience with the Slater Fire, what have PacifiCorp's managers and executives learned about safely operating PacifiCorp's system?	Matthew Karle Charles Madison Carolyn Chen Layla Labagh	6/2/2022	6/7/2022	6/7/2022		Please refer to the Company's response to CalPA Data Request 11.1.			

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49	CalPA	2022WMP-11	2022-WMP	6	CalPA Data Request 11.6	2022 WMP Update submission, and to the attached Follow-up Accident Report submitted to the CPUC regarding the Slater Fire (the "Accident Report"), dated October, 16, 2020. If the responses include privileged information or legal analysis or conclusions as well as technical and policy conclusions, please provide a version with the privileged and legal analysis/conclusions redacted. (a)What PacifiCorp company policies were adopted as a result of the Slater Fire? Please list each policy and its rationale separately. (b)What PacifiCorp company policies were changed as a result of the Slater Fire? Please list each company policy, the change made, and the rationale for such change separately. (c)Did PacifiCorp change its wildfire mitigation priorities as a result of the Slater Fire? If so, please explain how. Please list each priority change and its rationale separately.	Matthew Karle Charles Madison Carolyn Chen Layla Labagh	6/2/2022	6/7/2022	6/7/2022		Please refer to the Company's response to CalPA Data Request 11.1.			
50	CalPA	2022WMP-12	2022-WMP	1	CalPA Data Request 12.1	2022 WMP Update submission - In PacifiCorp's response to data request CalAdvocates-PacifiCorp-2022WMP-02, question 1, PacifiCorp states that: Field inspection services perform field audits on facility points that are audited by the external contractor as well as facility points not previously audited by the external contractor. These facility points are recorded in a detailed facility point report (an example is provided as Attachment CalPA 2.1 -2) and this data is then accumulated into the Audit Summary, also provided in Attachment CalPA 2.1-2, with all desktop and field audits performed. In reference to Attachment CalPA 2.1-2, [Audit Summary (CA) (2021).xlsx]: (a)Please provide the criteria used to determine if an inspection merits a safety flag (column U). (b)Please provide the criteria used to determine if a re-inspection is required (column V). (c)Please provide the criteria used to determine if an inspection passes or fails (column L).	Matthew Karle Charles Madison Carolyn Chen Layla Labagh	6/7/2022	6/10/2022	6/10/2022		(a)The safety flag is if a field visit was made to the external contractor's foreman and a safety observation was made on the foreman and his vehicle. For example, was a safety vest and hard hat being worn, vehicle parking and correct marking placed on the truck. (b)A reinspection can occur from a variety of factors including but not limited to overall inspection accuracy falling below the requirement, missing several of the same condition, or misidentifying conditions. (c)A section will pass or fail given the overall score of the section that was inspected. A passing score will be 90 percent in urban areas and 80 percent in rural areas. Passing scores are determined by the number of poles and conditions found in that section. The audit will fail if the section falls below those requirements, or the factors listed in the response to (b) above. (d)The accuracy is calculated by the number of conditions against the number of conditions missed.			
51	CalPA	2022WMP-12	2022-WMP	2	CalPA Data Request 12.2	2022 WMP Update submission - In reference to the Yreka 4/28/2021 audit (line 44) in Attachment CalPA 2.1-2, [Audit Summary (CA) (2021).xlsx]: (a)Please explain why the Yreka 4/28/2021 audit required a reinspection despite passing the audit. (b)The Yreka 4/28/2021 audit is the only audit in this table that is marked as requiring a reinspection, yet column W (description of reinspection requirement) is blank. Describe the reinspection requirements for this audit. (c)When did the reinspection (that was triggered by the Yreka 4/28/2021 audit) occur? (d)Describe the findings of the reinspection triggered by the Yreka 4/28/2021 audit.	Matthew Karle Charles Madison Carolyn Chen Layla Labagh	6/7/2022	6/10/2022	6/10/2022		(a)This was a typo in data entry from the external contractor's Quality Control (QC) team. This should not have been marked as requiring reinspection. It has been corrected on the tracking spreadsheet and will be monitored more closely in the future. (b)In looking at the report submitted by the external contractor for this audit, it is determined that the reinspection requirements were a typo on the spreadsheet and has since been corrected. (c)There was no reinspection required due to the typo in the shared tracking spreadsheet as explained in subpart (a) above. (d)There was no reinspection required due to the typo in the shared tracking spreadsheet as explained in subpart (a) above.			
52	CalPA	2022WMP-12	2022-WMP	4	CalPA Data Request 12.4	2022 WMP Update submission - In reference to Attachment CalPA 2.1-2, [Audit Summary (CA) (2021).xlsx]: (a)Please explain why the Crescent City 6/14/2021 audit (line 17) did not require a reinspection (column V) despite having the lowest overall accuracy score listed in this table (column H) and having a safety flag in column U. (b)Please explain why the Tulelake 10/5/2021 audit (line 24) did not require a reinspection (column V) despite having one of the lowest overall accuracy scores listed in this table (column H) and having a safety flag in column U. (c)Please explain why the Tulelake 11/18/2021 audit (line 30) did not require a reinspection (column V) despite having one of the lowest overall accuracy scores listed in this table (column H) and having a safety flag in column U.	Matthew Karle Charles Madison Carolyn Chen Layla Labagh	6/7/2022	6/10/2022	6/10/2022		(a)The sections were audited by our external contractor's Quality Control (QC) team and were considered rural, so they were above our required passing score. The safety flag means the inspector was visited and a safety inspection was performed to ensure he is performing the inspections safely. (b)The sections were audited by our external contractor's QC team and were considered rural, so they were above our required passing score. The safety flag means the contracted inspector was visited and a safety inspection was performed to ensure he is performing the inspections safely. (c)As explained in subpart (a) above, the sections audited were deemed to be rural and are above our required passing requirements for rural inspection. The safety flag shows that PacifiCorp also did a safety inspection of the contracted inspector to ensure the inspections were completed safely.			
53	CalPA	2022WMP-12	2022-WMP	5	CalPA Data Request 12.5	2022 WMP Update submission - In reference to Attachment CalPA 2.1-2, [Audit Summary (CA) (2021).xlsx], why are columns H through V blank for all desktop audits (rows 2 through 13)?	Matthew Karle Charles Madison Carolyn Chen Layla Labagh	6/7/2022	6/10/2022	6/10/2022		The reports for these audits were previously provided as Attachment CalPA 2.2. Please refer to Attachment CalPA 12.5 for the OSMOSE - 2021 Pacific Power Manual Overhead Quality Control Inspection.	1	Attachment CalPA 12.5	

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54	CalPA	2022WMP-12	2022-WMP	6	CalPA Data Request 12.6	<p>2022 WMP Update submission – In PacifiCorp’s response to [CalAdvocates-PacifiCorp-2022WMP-02 – 2.2], PacifiCorp states that:</p> <p>As part of the quality assurance (QA)/quality control (QC) process of asset inspections, the inspection contractor performs self-audits, some of which are joint audits with internal resources. The reports for these audits have been provided in Attachment CalPA 2.2.</p> <p>In reference to Page 99, of attachment CalPA 2.2, [OSMOSE - 2021 Pacific Power Manual Overhead Quality Control Inspection.pdf]:</p> <p>(a)Please explain why the overall accuracy is 97% in the OSMOSE report, yet the Audit Summary (CA) (2021) states that the overall accuracy is 95.5%.</p> <p>(b)Please provide an explanation of why bird damage was removed from the inspection record.</p> <p>(c)Please explain how PacifiCorp personnel employ judgment when determining</p>	Matthew Karle Charles Madison Carolyn Chen Layla Labagh	6/7/2022	6/10/2022	6/10/2022		<p>(a)This is a typo entered in by the externally contracted Quality Control (QC) team Osmose. Auditors for both Osmose and PacifiCorp will enter their audits completed at the end of the week. Much of the time, the auditor makes several records of audit entries as they are auditing across the PacifiCorp footprint and across both National Electric Safety Code (NESC), General Order 95 and Company standards.</p> <p>(b)The bird damage was removed via a judgement call by the Osmose QC team. It was of opinion that the bird damage did not align with the Company’s standards for bird damage and nesting activity. Photos are also provided to PacifiCorp and all changes to ensure inspection efforts are in alignment with each other and company requirements.</p> <p>(c)PacifiCorp will inspect several changes made by Osmose QC team to ensure alignment with the audit teams and company requirements. Judgement calls are made in the event where there may be a disagreement with an inspection result.</p>			
55	CalPA	2022WMP-11	2022-WMP	7	CalPA Data Request 11.7	<p>2022 WMP Update submission, and to the attached Follow-up Accident Report submitted to the CPUC regarding the Slater Fire (the “Accident Report”), dated October, 16, 2020. If the responses include privileged information or legal analysis or conclusions as well as technical and policy conclusions, please provide a version with the privileged and legal analysis/conclusions redacted.</p> <p>How did the Slater Fire influence or change PacifiCorp’s practices in each of these WMP initiative categories:</p> <p>(a)Risk assessment and mapping.</p> <p>(b)Situational awareness and forecasting.</p> <p>(c)Grid design and system hardening.</p> <p>(d)Asset management and inspections.</p> <p>(e)Vegetation management and inspections.</p> <p>(f)Grid operations and protocols.</p> <p>(g)Data governance.</p> <p>(h)Resource allocation methodology.</p> <p>(i)Emergency planning and preparedness.</p>	Matthew Karle Charles Madison Carolyn Chen Layla Labagh	6/2/2022	6/7/2022	6/7/2022		Please refer to the Company’s response to CalPA Data Request 11.1.			
56	CalPA	2022WMP-11	2022-WMP	8	CalPA Data Request 11.8	<p>2022 WMP Update submission, and to the attached Follow-up Accident Report submitted to the CPUC regarding the Slater Fire (the “Accident Report”), dated October, 16, 2020. If the responses include privileged information or legal analysis or conclusions as well as technical and policy conclusions, please provide a version with the privileged and legal analysis/conclusions redacted.</p> <p>(a)Did the Slater Fire influence PacifiCorp’s thresholds for Public Safety Power Shutoff (PSPS) events?</p> <p>(b)If the answer to part (a) is yes, please describe how PacifiCorp modified its thresholds for PSPS events as a result of the Slater Fire.</p> <p>(c)Aside from thresholds, did the Slater Fire influence or change PacifiCorp’s other practices regarding PSPS events (such as customer notification procedures, coordination with public safety partners, and initiatives to provide backup power options to vulnerable customers, among other things)?</p> <p>(d)If the answer to part (c) is yes, please describe how the Slater Fire influenced PacifiCorp’s PSPS practices aside from thresholds. Describe each change in these</p>	Matthew Karle Charles Madison Carolyn Chen Layla Labagh	6/2/2022	6/7/2022	6/7/2022		Please refer to the Company’s response to CalPA Data Request 11.1.			

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57	CalPA	2022WMP-06	2022-WMP	1	1st Supplemental Response to CalPA Data Request 6.1	2022 WMP Update submission, and to the attached Follow-up Accident Report submitted to the CPUC regarding the Slater Fire (the "Accident Report"), dated October, 16, 2020 - the Accident Report states that "Pacific Power is conducting a full investigation of the cause and origin of the fire." (a)Please provide Pacific Power's analysis of the cause and origin of the Slater Fire. (b)Please include all documentation (including but not limited to root cause analyses, risk and mitigation analyses, reports, work papers, etc.) regarding the analysis discussed in subpart (a) above.	Matthew Karle Miles Gordon Carolyn Chen Layla Labagh			6/14/2022		Further to the Company's response to CalAdvocates Data Request 6.1 dated May 24, 2022, the Company provides the following additional information: (a)PacifiCorp objects; PacifiCorp's investigation of the Slater Fire is protected by the attorney-client privilege and the attorney work product doctrine; there is pending litigation regarding the Slater Fire. Subject to objections, PacifiCorp responds as follows: on September 8, 2020, PacifiCorp's Office of General Counsel initiated a confidential and privileged investigation regarding the facts surrounding the Slater Fire. The privileged investigation was initiated and conducted to aid PacifiCorp's counsel with the provision of legal advice in connection with current and/or anticipated litigation and to prepare for trial, and is, therefore, conducted under the attorney-client privilege and protected by the attorney work product doctrine. PacifiCorp's Office of General Counsel and PacifiCorp's outside litigation counsel conducted the privileged investigation confidentially with the assistance, under the supervision and direction of counsel, of PacifiCorp employees, including PacifiCorp engineers, foresters, and line personnel, among others. PacifiCorp's Office of General Counsel and PacifiCorp's outside litigation counsel have also consulted with retained experts. PacifiCorp's outside counsel, in-house counsel, claims investigators, and subject matter experts have spent considerable time and expense conducting PacifiCorp's investigation into the cause and origin of the Slater Fire. Litigation regarding the Slater Fire is ongoing, and the privileged investigation continues to this day. PacifiCorp's legal team is not typically involved in PacifiCorp's investigations into the cause and origin of powerline-adjacent fires unless litigation is expected. When litigation is expected, as here, a primary purpose of the investigation is to assist counsel in preparing for trial. Outside of the privileged investigation, PacifiCorp Power has not conducted an analysis of the cause and origin of the Slater Fire. For certain incidents, PacifiCorp employees may be involved in an analysis to determine whether electric facilities were involved in any fire ignition. Because of the immediate threat of litigation with respect to the Slater Fire, however, this type of analysis did not occur with respect to the Slater Fire. Instead, PacifiCorp's Office of General Counsel immediately initiated its investigation in preparation of litigation.			
58	CalPA	2022WMP-06	2022-WMP	2	2nd Supplemental Response to CalPA Data Request 6.2	2022 WMP Update submission, and to the attached Follow-up Accident Report submitted to the CPUC regarding the Slater Fire (the "Accident Report"), dated October, 16, 2020 - This question pertains to external documents, meaning any investigation, examination, or analysis of the Slater Fire that was not performed by PacifiCorp. (a)Please provide any external investigation reports that PacifiCorp possesses regarding the Slater Fire, including but not limited to CPUC or U.S. Forest Service investigation reports. (b)Are you aware of any external investigation reports or analyses pertaining to the Slater Fire, aside from those covered by part (a) of this question? If so, please identify each such document.	Matthew Karle Miles Gordon Carolyn Chen Layla Labagh			6/14/2022		Further to the Company's prior response to CalAdvocates Data Request 6.2, the Company provides the following additional information: (a)Please refer to the Company's 1st Supplemental response to CalPA Data Request 6.1 subpart (a). (b)Please refer to the Company's 1st Supplemental response to CalPA Data Request 6.1 subpart (b).			
59	CalPA	2022WMP-06	2022-WMP	3	1st Supplemental Response to CalPA Data Request 6.3	2022 WMP Update submission, and to the attached Follow-up Accident Report submitted to the CPUC regarding the Slater Fire (the "Accident Report"), dated October, 16, 2020 (a)T Based on the reports and analyses addressed in questions 1 and 2, what has PacifiCorp learned about wildfire risk in its service territory and wildfire mitigation methods. Please identify each lesson separately. (b)Please state the basis of each lesson identified in part (a) above.	Matthew Karle Miles Gordon Carolyn Chen Layla Labagh			6/14/2022		Further to the Company's response to CalAdvocates Data Request 6.3 dated May 24, 2022, the Company provides the following additional information: (a)PacifiCorp objects; PacifiCorp's investigation of the Slater Fire is protected by the attorney-client privilege and the attorney work product doctrine; there is pending litigation regarding the Slater Fire. Subject to objections, PacifiCorp responds as follows: as set forth in the Company's 1st Supplemental response to CalPA Data Request 6.1, PacifiCorp's investigation to date has focused on litigation defense. After the internal investigation is complete, and at the appropriate time, PacifiCorp may conduct additional analysis based on such investigation. At this time, PacifiCorp disputes whether the Slater Fire ignition was associated with electrical facilities. Without making any admissions and reserving all of its rights to dispute any item in the investigation report completed by the United States Forest Service (USFS), which concluded that the cause of the fire was power lines downed by a fallen tree, PacifiCorp emphasizes that the USFS found the subject tree to be approximately 43 feet outside of the right of way. USFS also concluded that the tree, though burned from the fire, showed evidence of green healthy needles and was producing cones. The USFS entomologist described the subject tree as one that would not be classified as a hazard tree given its outward appearance. Even assuming that the USFS is correct in its conclusion that the Slater Fire is related to electric facilities, PacifiCorp does not believe that the failure of this type of tree, which could not have been identified as a hazard tree, warrants any modifications to PacifiCorp's vegetation management practices. Again assuming that the USFS is correct, PacifiCorp believes that an ignition caused by this green tree, which could not have been identified as a hazard tree, would further support PacifiCorp's commitment to system hardening projects using covered conductor technologies. Again assuming that the USFS is correct, PacifiCorp will continue to evaluate whether such scenarios warrant broader use of public safety power shut-off (PSPS), still recognizing that many experts and stakeholders have cautioned against using PSPS. (b)PacifiCorp's investigation of the Slater Fire is protected by the attorney-client privilege and the attorney work			

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60	CalPA	2022WMP-06	2022-WMP	4	1st Supplemental Response to CalPA Data Request 6.4	2022 WMP Update submission, and to the attached Follow-up Accident Report submitted to the CPUC regarding the Slater Fire (the "Accident Report"), dated October, 16, 2020 - the Accident Report also states that "Pacific Power is repairing the [sic] all the facilities affected by the fire". (a)Please provide a detailed description of these repairs referenced above. (b)Please provide a detailed description of any other changes made to Pacific Power's system as a result of the Slater Fire and resultant investigations.	Matthew Karle Miles Gordon Carolyn Chen Layla Labagh			6/14/2022		Further to the Company's response to CalAdvocates Data Request 6.4 dated May 24, 2022, the Company provides the following additional information: (a)Please refer to the Company's 1st Supplemental response to CalPA Data Request 6.3 subpart (a). (b)PacifiCorp objects; PacifiCorp's investigation of the Slater Fire is protected by the attorney-client privilege and the attorney work product doctrine; there is pending litigation regarding the Slater Fire. Subject to objections, PacifiCorp responds as follows: The repairs identified in the Company's response to subpart (a) reflect a change to the system as a result of the Slater Fire; in addition, please refer to the Company's 1st Supplemental response to CalPA Data Request 6.1 and CalPA Data Request 6.3; no other specific changes to the system have been made as a result of the Slater Fire, although PacifiCorp may continue to evaluate whether the alleged causes of the Slater Fire influence any public safety power shut-off (PSPS) decision-making.			
61	CalPA	2022WMP-11	2022-WMP	4	1st Supplemental Response to CalPA Data Request 11.4	2022 WMP Update submission, and to the attached Follow-up Accident Report submitted to the CPUC regarding the Slater Fire (the "Accident Report"), dated October, 16, 2020. If the responses include privileged information or legal analysis or conclusions as well as technical and policy conclusions, please provide a version with the privileged and legal analysis/conclusions redacted. (a)Please identify the circuit and circuit-segment nearest to the location where the Slater Fire started. (b)Please state when the above-identified circuit segment had been last subject to a vegetation management inspection prior to the Slater Fire. (c)Please provide any vegetation corrective notifications identified by as part of the most recent vegetation management inspections conducted prior to the Slater Fire. (d)Please state when you last performed vegetation management work (i.e., tree trimming or removal) on the above-identified circuit segment prior to the Slater Fire. (e)Please state when the above-identified circuit segment had been last subject to detailed asset inspections prior to the Slater Fire. (f)Please provide any asset maintenance corrective notifications identified as part of the most recent asset management inspections conducted prior to the Slater Fire. (g)At the time the ignition occurred, was the above-identified circuit segment scoped for inclusion in any system hardening programs in PacifiCorp's 2020 Wildfire	Matthew Karle Miles Gordon Carolyn Chen Layla Labagh			6/15/2022		Further to the Company's response to CalAdvocates Data Request 11.4 dated June 7, 2022, the Company provides the following additional information responsive to subparts (b) and (f):	1	Attachment CalPA 11.4 (b) 1st SUPP	
62	CalPA	2022WMP-13	2022-WMP	1	CalPA Data Request 13.1	Regarding the quote above from page 70 of PacifiCorp's 2022 WMP: a) Please confirm if PacifiCorp proposes to model wildfire spread for 96 hours. b) Does PacifiCorp plan to use the aforementioned wildfire simulations "over a 96-hour forecast horizon" to estimate wildfire consequence (and therefore wildfire risk) for particular assets, circuit-segments, or circuits? c) If the answer to part (b) is yes, does PacifiCorp plan to use the resulting wildfire risk estimates to influence the selection and priority of system hardening projects? d) If the answer to part (b) is no, state what duration of wildfire simulation PacifiCorp plans to use to estimate wildfire consequence (and therefore wildfire risk) for particular assets, circuit-segments, or circuits.	Matthew Karle Miles Gordon Carolyn Chen Layla Labagh	6/21/2022	7/6/2022	7/6/2022		(a)PacifiCorp runs a weather research and forecasting (WRF) model which produces a 96-hour forecast. The output from this WRF model is delivered to Technosylva to be used as the weather input for the wildfire spread model (FireCast) within Wildfire Analyst Enterprise. Each individual wildfire simulation duration is eight hours. (b)Individual wildfire simulations are only eight hours. Wildfire simulations are initiated at three-hour intervals across a 96-hour forecast horizon. (c)No. PacifiCorp plans to use the Wildfire Risk Reduction Model (WRRM) component of Wildfire Analyst Enterprise to influence the selection and priority of system hardening projects. (d)PacifiCorp plans the duration of each wildfire simulation to be eight hours.			
63	CalPA	2022WMP-13	2022-WMP	2	CalPA Data Request 13.2	Regarding the quote above from page 70 of PacifiCorp's 2022 WMP: a) Please explain how PacifiCorp chose a 96-hour forecast horizon. b) Please provide all available analysis or data on the accuracy of Technosylva's wildfire simulations over a 96-hour duration.	Matthew Karle Miles Gordon Carolyn Chen Layla Labagh	6/21/2022	7/6/2022	7/6/2022		(a)PacifiCorp's weather research and forecasting (WRF) domain is very large and computationally expensive. There is a significant amount of time required to run and process WRF at this scale. A 96-hour forecast horizon was determined to be the best compromise between run-time and lead-time based on our current computational capabilities. A shorter forecast horizon would be completed and available sooner, but would also provide less lead time to prepare and plan for potential extreme weather events. A longer forecast horizon would take considerably more time to complete and would already be 12 to 24 hours old by the time it was delivered. The data then still must be ingested into Wildfire Analyst Enterprise (FireCast) to run the millions of eight-hour wildfire simulations across the 96-hour forecast period. (b)PacifiCorp does not simulate individual wildfires over a 96-hour duration. Each individual wildfire simulation duration is eight-hours. These simulations are performed at specific intervals across the 96-hour forecast period.			
64	CalPA	2022WMP-13	2022-WMP	3	CalPA Data Request 13.3	Regarding the quote above from page 70 of PacifiCorp's 2022 WMP: a) Has PacifiCorp consulted with any other utilities on an appropriate simulation duration? b) Please list those utilities if so. c) Has PacifiCorp consulted with any agencies, universities, research groups, or other entities on an appropriate simulation duration? d) Please list those organizations if so.	Matthew Karle Miles Gordon Carolyn Chen Layla Labagh	6/21/2022	7/6/2022	7/6/2022		(a)Yes, PacifiCorp's approach is consistent with other California investor-owned utilities (IOU). Each individual wildfire simulation duration is eight-hours. (b)San Diego Gas & Electric. (c)No, PacifiCorp has not consulted with any other entities on simulation duration. (d)Not applicable.			

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65	CalPA	2022WMP-13	2022-WMP	4	CalPA Data Request 13.4	Regarding the quote above from page 70 of PacifiCorp's 2022 WMP: a) Does PacifiCorp plan to change the simulation duration in the future? b) Please describe your plans if so.	Matthew Karle Miles Gordon Carolyn Chen Layla Labagh	6/21/2022	7/6/2022	7/6/2022		(a)PacifiCorp does not plan to change the simulation duration at this time. (b)Not applicable.			
66	CalPA	2022WMP-16	2022-WMP	1	CalPA Data Request 16.1	State how many customer accounts PacifiCorp has as of July 1, 2022, and disaggregate the total by HFTD tier (as defined above).	Tyler Holzschuh Carolyn Chen Layla Labagh	7/5/2022	7/19/2022	7/19/2022		Please refer to the table provided below which provides the required information by high-fire threat district (HFTD) tier: California Customers In HFTD Tier 218,171 In HFTD Tier 31,107 Total in HFTD19,278 Outside of HFTD27,335 TOTAL 46,613			
67	CalPA	2022WMP-16	2022-WMP	2	CalPA Data Request 16.2	Do you use unusually sensitive protective device settings (i.e., "fast curve" or "fast trip" settings) during certain times of the year, during weather conditions that create high risk of wildfire, or on relatively high-risk circuits? b) If the answer to part (a) of this question is yes, please describe when and where you implement these more sensitive protective device settings. c) Please explain the reasoning supporting the choices described in part (b) of this question.	Tyler Holzschuh Carolyn Chen Layla Labagh	7/5/2022	7/19/2022	7/19/2022		(a)Yes, fast curve or fast trip settings are used during certain times of the year depending on the level of wildfire risk on particular circuits. (b)These settings will be implemented for circuits in the high fire threat district (HFTD) (or where fuels will allow for the ignition and spread of a wildfire) during periods of significant or extreme wildfire risk as determined by PacifiCorp Meteorology. (c)The reason is to reduce arc energy and fault interruption time and to cause the circuit to trip faster than what would typically be required for a fuse to operate. All of these consequences of fast trip or fast curve reduce the potential for a fault to cause an ignition and subsequent wildfire.			
68	CalPA	2022WMP-16	2022-WMP	3	CalPA Data Request 16.3	Please provide the protective device settings that PacifiCorp plans to use during high fire-risk weather in 2022, including the following parameters: a) The minimum to trip current, b) Definite time delay, c) Time curve, and d) Coordination parameters.	Tyler Holzschuh Carolyn Chen Layla Labagh	7/5/2022	7/19/2022	7/19/2022		(a)The fast curve settings for 2022 are to set the minimum trip current for the high fire-risk conditions is set to 200 percent of the maximum feeder demand based on the previous year one-year load profile, where available. Devices set prior to 2022 may have different settings, aligned with the setting guide revision at that time. (b)The definite time delay is set to 0.02 if there is no recloser downstream. If communication with the downstream device is available, the delay is set at 0.02 to 0.05 seconds to accommodate communications delays, otherwise the element is set to 0.1 seconds plus the 'fast' operate time of the downstream recloser to a maximum of 0.2 seconds. (c)Coordinate time overcurrent curves are not the primary protection used during times of elevated fire risk. At the substation time overcurrent curves are only used as backup elements once the decision has been made to implement sensitive protective settings. For line reclosers, a very fast fuse saving curve is used. (d)When operating under sensitive protective settings definite time elements are used to provide coordinated tripping on the feeder. Time overcurrent curves are active to provide backup protection.			
69	CalPA	2022WMP-16	2022-WMP	4	CalPA Data Request 16.4	If any of the parameters identified in question 3 depend on the normal operating parameters for its protective devices (i.e., device settings such as the minimum to trip during ordinary weather or outside of HFTD areas), please describe how PacifiCorp determines those normal operating parameters.	Tyler Holzschuh Carolyn Chen Layla Labagh	7/5/2022	7/19/2022	7/19/2022		The Company assumes that the reference to "question 3" is intended to be a reference to CalPA Data Request 16.3. Based on the foregoing assumption, the Company responds as follows: There are no direct dependencies established between the normal operating parameters and those used for sensitive protection.			
70	CalPA	2022WMP-16	2022-WMP	5	CalPA Data Request 16.5	a) Please state whether PacifiCorp plans to coordinate protective devices with fuses' time overcurrent curves, or plans to operate protective devices in a fuse-saving mode (i.e. the recloser/circuit breaker trips before the fuse operates) while fast curve settings are in effect. b) Please explain the reasoning for PacifiCorp's choice(s) in part (a) of this question.	Tyler Holzschuh Carolyn Chen Layla Labagh	7/5/2022	7/19/2022	7/19/2022		(a)PacifiCorp does not plan to coordinate with fuses where sensitive protective settings are enabled. (b)The coordination of timer overcurrent elements such as fuses requires inherent delay, which must be reduced to minimize the risk of sustained ignition during a fault.			
71	CalPA	2022WMP-16	2022-WMP	6	CalPA Data Request 16.6	a) Any studies that show how PacifiCorp determined that the protective device settings identified in question 3 are the best settings to use during high fire-risk weather; and b) Any studies of the expected impact to reliability due to the settings identified in question 3.	Tyler Holzschuh Carolyn Chen Layla Labagh	7/5/2022	7/19/2022	7/19/2022		The Company assumes that the reference to "question 3" is intended to be a reference to CalPA Data Request 16.3. Based on the foregoing assumption, the Company responds as follows: (a)PacifiCorp has reviewed the "Probability of Bushfire Ignition from Electric Arc Faults" study, and Avista Corporation's "What's the Risk? One Utility's Approach to Strengthening its Wildfire Resiliency" to learn about and influence protective device settings. (b)PacifiCorp generally understands that recloser settings have an impact on reliability and seeks to find a balance between wildfire safety and providing reliable power to customers however, no formal studies have been conducted by PacifiCorp.			
72	CalPA	2022WMP-16	2022-WMP	7	CalPA Data Request 16.7	Please provide the protective device settings that PacifiCorp normally uses (i.e., outside of HFTD areas or outside of high fire-risk weather) in 2022, including the following parameters: a) The minimum to trip current; b) Definite time delay; c) Time curve; and d) Coordination parameters.	Tyler Holzschuh Carolyn Chen Layla Labagh	7/5/2022	7/19/2022	7/19/2022		(a)Set pickup to 200 percent of the highest forecasted feeder demand for the next five years, aligned with the setting guide revision at that time. (b)Set to 0.02 seconds unless there are line reclosers downstream. If there are line reclosers downstream set to 0.1 seconds plus the 'fast' operate time of the downstream recloser. These elements are active for the first trip only when using a fuse saving schemes. (c)Set pickup to 200 percent of the highest forecasted feeder demand for the next five years. Very inverse and extremely inverse time curves are preferred for both the substation breaker and the line recloser. (d)A coordination margin of 0.35 seconds is used between time-overcurrent elements.			

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73	CalPA	2022WMP-16	2022-WMP	8	CalPA Data Request 16.8	Please provide the protective device settings that PacifiCorp used during high fire-risk weather in 2021, including the following parameters: a) The minimum to trip current, b) Definite time delay, c) Time curve, and d) Coordination parameters.	Tyler Holzschuh Carolyn Chen Layla Labagh	7/5/2022	7/19/2022	7/19/2022		(a)Set pickup to 200 percent of the highest forecasted feeder demand for the next five years, Devices set prior to 2020 may have different settings, aligned with the setting guide revision at that time. (b)Set to 0.02 seconds unless there are line reclosers downstream. If there are line reclosers downstream, set to 0.1 seconds plus the 'fast' operate time of the downstream recloser. (c)Coordinated time overcurrent curves were not the primary protection used during times of elevated fire risk. At the substation time overcurrent curves are only used as backup elements once the decision has been made to implement sensitive protective settings. For line reclosers a very fast fuse saving curve is used. (d)When operating under sensitive protective settings, definite time elements are used to provide coordinated tripping on the feeder. Time overcurrent curves are active to provide backup protection.			
74	CalPA	2022WMP-16	2022-WMP	9	CalPA Data Request 16.9	If any of the parameters identified in question 8 depended on the normal operating parameters for its protective devices (i.e., device settings such as the minimum to trip during ordinary weather or outside of HFTD areas), please describe how PacifiCorp determined those normal operating parameters.	Tyler Holzschuh Carolyn Chen Layla Labagh	7/5/2022	7/19/2022	7/19/2022		The Company assumes that the reference to "question 8" is intended to be a reference to CalPA Data Request 16.8. Based on the foregoing assumption, the Company responds as follows: There are no direct dependencies established between the normal operating parameters and those used for sensitive protection.			
75	CalPA	2022WMP-16	2022-WMP	10	CalPA Data Request 16.10	a) Please state whether, in 2021, PacifiCorp coordinated protective devices with fuses' time overcurrent curves, or operated protective devices in a fuse-saving mode (i.e. the recloser/circuit breaker trips before the fuse operates) while fast curve settings were in effect. b) Please explain the reasoning for PacifiCorp's choice(s) in part (a) of this question.	Tyler Holzschuh Carolyn Chen Layla Labagh	7/5/2022	7/19/2022	7/19/2022		(a)PacifiCorp did not coordinate with fuses in circumstances where sensitive protective settings were enabled. (b)The coordination of timer overcurrent elements such as fuses requires inherent delay which must be reduced to minimize the risk of sustained ignition during a fault.			
76	CalPA	2022WMP-16	2022-WMP	11	CalPA Data Request 16.11	Please provide any studies that show how PacifiCorp determined that the protective device settings identified in question 8 were the best settings to use during high fire-risk weather.	Tyler Holzschuh Carolyn Chen Layla Labagh	7/5/2022	7/19/2022	7/19/2022		The Company assumes that the reference to "question 8" is intended to be a reference to CalPA Data Request 16.8. Based on the foregoing assumption, the Company responds as follows: Please refer to the Company's response to CalPA Data Request 16.6.	1	Attach CalPA 16.12	
77	CalPA	2022WMP-16	2022-WMP	12	CalPA Data Request 16.12	Please provide a spreadsheet listing (as rows) each outage that occurred in 2021 on a PacifiCorp circuit that had fast curve settings at any point during 2021, including the following information as columns: a) The circuit ID number of the circuit involved in the outage (associated circuit); b) The cause of the outage; c) The asset ID number of the furthest upstream protective device that operated on the associated circuit; d) The geographic latitude (in decimal degrees, truncated to seven decimal places) of the furthest upstream protective device that operated on the associated circuit; e) The geographic longitude (in decimal degrees, truncated to seven decimal places) of the furthest upstream protective device that operated on the associated circuit; f) Whether the furthest upstream protective device on the associated circuit was a fuse; g) The number of customers interrupted as a result of the outage; h) The total customer minutes of interruption as a result of the outage; and i) The duration of the outage (in minutes).	Tyler Holzschuh Carolyn Chen Layla Labagh	7/5/2022	7/19/2022	7/19/2022		Please refer to Attachment CalPA 16.12. Note: some missing data is due to not having a formal system to record recloser settings as it is done manually. Some of this data is available as it was recorded in operational notes throughout the process.	1	Attach CalPA 16.13	
78	CalPA	2022WMP-16	2022-WMP	13	CalPA Data Request 16.13	Please provide a spreadsheet listing (as rows) each protective devices that had fast curve settings enabled in 2021, including the following information as columns: a) The device number of the protective device; b) The type of device (e.g., recloser); c) The geographic latitude of the device (in decimal degrees, truncated to seven decimal places); d) The geographic longitude of the device (in decimal degrees, truncated to seven decimal places); e) The ID number of the circuit the device was on; f) The number of times that the fast curve setting was enabled on this device in 2021; g) The date and time when the fast curve setting on this device was enabled; h) The date and time when then the fast curve setting on this device was disabled; i) The reason why the fast curve setting on this device was enabled in this instance (e.g., Red Flag Warning, or Fire Weather Threat Declaration); and j) If fast curve settings were enabled more than once on a particular device, please replicate columns G, H and I as needed to provide a start and end date for each instance in which was the fast curve setting was enabled.	Tyler Holzschuh Carolyn Chen Layla Labagh	7/5/2022	7/19/2022	7/19/2022		For the Company's responses to subparts (a) through (h), please refer to Attachment CalPA 16.13. Note: some missing data is due to not having a formal system to record recloser settings as it is done manually. Some of this data is available as it was recorded in operational notes throughout the process. Please refer below to for Company's responses to subparts (i) and (j): (i)Fuel dryness was at or near record levels owing to extreme to exceptional drought conditions and highly anomalous summer heat. The extreme fuels and drought conditions contributed to a much higher than normal risk of large wildfires and extreme fire behavior even in the absence of critical fire weather conditions, particularly in mountainous terrain. As a result, the National Geographic Area Coordination Center (GACC) issued a Fuels and Fire Behavior Advisory which was in effect for much of the summer. During this time, there were numerous very large wildfires burning across the region, including the Bootleg Fire (413,717 acres) in southern Oregon, and the Dixie Fire (963,309 acres) in northern California. (j)Not applicable.			

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79	CalPA	2022WMP-16	2022-WMP	14	CalPA Data Request 16.14	Please provide the protective device settings that PacifiCorp normally used (i.e., outside of HFTD areas or outside of high fire-risk weather) in 2021, including the following parameters: a) The minimum to trip current; b) Definite time delay; c) Time curve; and d) Coordination parameters.	Tyler Holzschuh Carolyn Chen Layla Labagh	7/5/2022	7/19/2022	7/19/2022		(a)Set pickup to 200 percent of the highest forecasted feeder demand for the next five years. (b)Set to 0.02 seconds unless there are line reclosers downstream. If there are line reclosers downstream, set to 0.1 seconds plus the 'fast' operate time of the downstream recloser. These elements are active for the first trip only when using a fuse saving schemes. (c)Set pickup to 200 percent of the highest forecasted feeder demand for the next five years. Very inverse and extremely inverse time curves are preferred for both the substation breaker and the line recloser. (d)A coordination margin of 0.35 seconds is used between time-overcurrent elements.			
80	CalPA	2022WMP-17	2022-WMP	3	CalPA Data Request 17.1	On June 14, 2022, PacifiCorp submitted its 1st Supplemental Response to Cal Advocates Data Request, CalAdvocates-PacifiCorp-2022WMP-06. In its response to Question 6.1, PacifiCorp submitted a privilege log with one entry including document "Memorandum Regarding Slater Fire Investigation" (Memorandum). The "Date" section of this entry provides no dates of the Memorandum and says, "Memorandum remains in draft form and all prior draft versions are incorporated." Please provide complete privilege log entries, including dates, of all withheld drafts of the Memorandum Regarding Slater Fire Investigation. This includes prior and current drafts.	Carolyn Chen Layla Labagh	7/20/2022	8/3/2022	8/3/2022		The Company assumes that the reference to "1st Supplemental Response to Cal Advocates Data Request, CalAdvocates-PacifiCorp-2022WMP-06" and "Question 6.1" is intended to be reference to the Company's 1st Supplemental response to CalPA Data Request 6.1. Based on the foregoing assumption, the Company responds as follows: PacifiCorp maintains its prior objections based on the attorney-client privilege and the attorney work-product doctrine. Subject to and without waiving those objections, PacifiCorp provides the following additional information: Document TitleAuthorFromToDate Memorandum Regarding Slater Fire InvestigationHueston Hennigan LLPDerek FloresPacifiCorp Office of General CounselNovember 2, 2020 Memorandum Regarding Slater Fire InvestigationHueston Hennigan LLPDerek FloresPacifiCorp Office of General CounselNovember 13, 2020 Memorandum Regarding Slater Fire InvestigationHueston Hennigan LLPDerek FloresPacifiCorp Office of General CounselNovember 20, 2020 Memorandum Regarding Slater Fire InvestigationHueston Hennigan LLPDerek FloresPacifiCorp Office of General CounselDecember 14, 2020 Memorandum Regarding Slater Fire InvestigationHueston Hennigan LLPDerek FloresPacifiCorp Office of General CounselJanuary 4, 2021 Memorandum Regarding Slater Fire InvestigationHueston Hennigan LLPDerek FloresPacifiCorp Office of General CounselFebruary 22, 2021 Memorandum Regarding Slater Fire InvestigationHueston Hennigan LLPDerek FloresPacifiCorp Office of General CounselApril 26, 2021 Memorandum Regarding Slater Fire InvestigationHueston Hennigan LLPDerek FloresPacifiCorp Office of			
81	CalPA	2022WMP-17	2022-WMP	3	CalPA Data Request 17.2	If applicable, please provide complete privilege log entries for any other withheld materials (besides the Memorandum Regarding Slater Fire Investigation) responsive to data request CalAdvocates-PacifiCorp-2022WMP-06.	Carolyn Chen Layla Labagh	7/20/2022	8/3/2022	8/3/2022		The Company assumes that the reference to "data request CalAdvocates-PacifiCorp-2022WMP-06" is intended to be reference to CalPA Data Request Set 6 (1 to 4). Based on the foregoing assumption, the Company responds as follows: PacifiCorp maintains its prior objections to CalPA Data Request Set 6 (1 to 4) based on the attorney-client privilege and the attorney work-product doctrine. Subject to and without waiving those objections, PacifiCorp provides the following response: Not applicable.			
82	CalPA	2022WMP-17	2022-WMP	3	CalPA Data Request 17.3	If applicable, please provide complete privilege log entries for any other withheld materials (besides the Memorandum Regarding Slater Fire Investigation) responsive to data request CalAdvocates-PacifiCorp-2022WMP-11.	Carolyn Chen Layla Labagh	7/20/2022	8/3/2022	8/3/2022		The Company assumes that the reference to "data request CalAdvocates-PacifiCorp-2022WMP-11" is intended to be reference to CalPA Data Request Set 11 (1 to 8). Based on the foregoing assumption, the Company responds as follows: PacifiCorp maintains its prior objections to CalPA Data Request Set 11 (1 to 8) based on the attorney-client privilege and the attorney work-product doctrine. Subject to and without waiving those objections, PacifiCorp provides the following response: Not applicable.			
83	CalPA	2022WMP-18	2022-WMP	1	CalPA Data Request 18.1	Please provide the spreadsheet that PacifiCorp provided as a response to data request CalAdvocates-PacifiCorp-2022WMP-16 question 12 with an additional column containing the start time of the outage.	Tyler Holzschuh Carolyn Chen Layla Labagh	7/22/2022	8/5/2022	8/5/2022		The Company assumes that the reference to "CalAdvocates-PacifiCorp-2022WMP-16 question 12" is intended to be a reference to CalPA Data Request 16.12. Based on the foregoing assumption, the Company responds as follows: Please refer to Attachment CalPA 18.1.	1	Attach CalPA 18.1	

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84	CalPA	2022WMP-18	2022-WMP	2	CalPA Data Request 18.2	<p>a) Does PacifiCorp use a ground overcurrent setting as part of its fast-trip settings for wildfire mitigation.</p> <p>b) If the answer to part a) is yes, please provide all settings including:</p> <p>i) Minimum to trip current;</p> <p>ii) Definite time delay;</p> <p>iii) The time-current curves; and</p> <p>iv) The coordination parameters</p> <p>c) Please explain the reasoning supporting the choices described in part (b) of this question.</p>	Tyler Holzschuh Carolyn Chen Layla Labagh	7/22/2022	8/5/2022	8/5/2022		<p>(a)Yes.</p> <p>(b) Please refer to the Company's responses to subparts i. through iv. below:</p> <p>i.Set to 200 percent of the maximum imbalance as determined from the one-year load profile. If one-year load profile is not available, set to 50 percent of forecast feeder demand for the next five years.</p> <p>ii.Set to 0.02 seconds unless there are line reclosers downstream. If there are line reclosers downstream, set to 0.1 seconds plus the 'fast' operate time of the downstream recloser.</p> <p>iii.Coordinated time overcurrent curves were not the primary protection used during times of elevated fire risk. At the substation time overcurrent curves are only used as backup elements once the decision has been made to implement sensitive protective settings. For line reclosers a very fast fuse saving curve is used.</p> <p>iv.When operating under sensitive protective settings definite time elements are used to provide coordinated tripping on the feeder. Time overcurrent curves are active to provide backup protection.</p> <p>(c)Most faults on the distribution system are single line to ground and would therefore be detected by ground overcurrent protective elements. The sensitive detection of these faults is therefore an essential element of any wildland fire protection strategy. These elements can be set more sensitively than phase elements without impacting the ability to serve load. A minimum pickup was established based on the greatest imbalance which was detected in the prior year's loading data with sufficient margin for system anomalies and restoration activities. Any imbalance current above this threshold is therefore assumed to be a fault. In the absence of this loading data the threshold is set based on load forecast information so that service is not unnecessarily interrupted.</p>			
85	CalPA	2022WMP-19	2022-WMP	1	CalPA Data Request 19.1	<p>On pages 175-176 of its 2022 WMP, PacifiCorp states: Some materials are more susceptible to fire and ignition than others, PacifiCorp can build a more resilient system by utilizing equipment which is more fire resistant by using alternate materials such as fiber glass or steel poles. As PacifiCorp identifies poles for replacement through the Line Rebuild program, described in section 7.3.3.3. PacifiCorp plans to mitigate the risk associated with wood poles by replacing them with more fire resilient materials.</p> <p>Regarding your selection and installation of non-wood pole materials:</p> <p>a) Please describe which non-wood pole materials you typically install for fire hardening in HFTD locations as of 2020.</p> <p>b) Please explain how factors such as terrain, voltage, wildfire risk, or HFTD tier would affect your decision to select and install non-wood pole materials.</p> <p>c) Please provide any analyses or studies that validate your assessment of the conditions where non-wood pole materials are the most reasonable and cost-effective option for fire hardening poles in HFTD locations.</p>	Charles Madison Carolyn Chen Layla Labagh	8/8/2022	8/11/2022	8/11/2022		<p>(a)PacifiCorp primarily uses fiberglass poles during installation of fire hardening in high-fire threat district (HFTD) locations and steel poles as a secondary if fiberglass is deemed not applicable in a particular location or situation.</p> <p>(b)As a standard, if a pole is replaced as part of the line rebuild program, a non-wood material is selected for replacement. Load conditions and available pole sizes which determine if the poles are fiberglass or steel. PacifiCorp does not factor in terrain, voltage, wildfire risk, or HFTD tier when deciding on the material for a non-wood pole installation.</p> <p>(c)PacifiCorp has analyzed and studied wildfire mitigation plans from other utility's such as San Diego Gas & Electric (SDG&E) and Southern California Edison (SCE) to help determine the most reasonable and cost-effective options when it comes to fire hardening poles. Replacing wood poles with fiberglass and steel provide increased fire resistance with more consistent strength. In the event of a fire event, wooden poles have the potential to become added fuel whereas fiberglass or steel do not contribute to such events and are a more fire-resistant material than wood.</p>			
86	OEIS	OEIS-PC-22-002	OEIS-PC-22-002	1	OEIS Data Request 4.1	<p>a. PacifiCorp (PC) has not provided all required PSPS information in Table 11: Recent use of PSPS and other PSPS metrics. Minimally, all columns for rows 1a, 1b, and 1c are critically important; however, all data are required.</p> <p>i. Provide the information requested in all columns and rows of Table 11. If any data cannot be provided, provide an explanation of why and a timetable for when it can be provided.</p>	Jessica McHale	8/10/2022	8/15/2022	8/15/2022		<p>i. Where data was available, PacifiCorp was able to populate the 2015 through 2020 actual datasets requested in Table 11. From 2021 and forward, if there was no public safety power shutoff (PSPS) event in PacifiCorp's service territory during a quarter, there is no data associated with PSPS to report. When PSPS events occur or were projected to occur, all rows were populated (see screenshot of Table 11 below).</p>			

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87	OEIS	OEIS-PC-22-002	OEIS-PC-22-002	2	OEIS Data Request 4.2	<p>a. On page 268-270 of its 2022 Update, PacifiCorp indicates it recently completed approximately 3 miles of covered conductor in Mt. Shasta, potentially lessening the threat of need for PSPS on that circuit segment in the future. PacifiCorp indicates it plans to implement approximately 82 miles of covered conductor in Mt. Shasta over three years.</p> <p>i. How does PC plan to achieve this rate of increased project completion (e.g., 26 miles per year)?</p> <p>ii. How does PC plan to achieve its overall covered conductor target in 2022 (e.g., 112 miles in 2022)?</p> <p>iii. How is PC reallocating resources needed to reach its goals?</p>	Jessica McHale	8/10/2022	8/15/2022	8/15/2022		<p>The Company assumes that the reference to "PC" is intended to be a reference to PacifiCorp. Based on the foregoing assumption, the Company responds as follows:</p> <p>i. For each covered conductor project within the Line Rebuild program, there is approximately a 12 to 24-month timeline, as shown in Figure 1 below: Figure 1 : Typical Line Rebuild Timeline The timeline includes engineering time, permitting time and construction time. Much of the project tasks were due to be completed by limited, shared, internal resources. To address this timeline and shorten it, PacifiCorp plans to procure a Contractor Management Partner, described in the Implementation subsection for 9.3 Covered Conductor Installation Reporting of PacifiCorp's 2022 Wildfire Mitigation Plan (WMP), to provide additional resources for the work. This new contracted partner is expected to facilitate delivery of the various aspects of covered conductor projects, such as project management, project controls, project reporting, engineering, estimating, permitting, surveying, material procurement, material management, construction, and post construction inspections. In the 2022 WMP Overview Presentation given by PacifiCorp on May 18, 2022, PacifiCorp describes the updated contract management strategy with the graphic below (Figure 2). On the left are the current resources, there are few, and on the right is the resources that will be provided by the construction management partners, there are many more resources and fully dedicated teams of contractors:</p> <p>Figure 2 : Slide from the 2022 WMP Overview Presentation on May 18, 2022 regarding the updated Contract Management Strategy</p> <p>ii. In 2021, the projects were in the Scoping and Design phase of Figure 1 above. In 2022, the projects progress into the design, permitting and construction phases of Figure 1 above. Therefore, PacifiCorp plans to continue its progress on the covered conductor projects and continue their progression along the timeline provided in</p>			
88	OEIS	OEIS-PC-22-002	OEIS-PC-22-002	3	OEIS Data Request 4.3	<p>a. Regarding PacifiCorp's QA/QC of asset inspections:</p> <p>i. Provide the results of the QA/QC audits performed in 2021 for both distribution and transmission asset inspections, broken down by inspection type (patrol, detailed, etc.).</p> <p>ii. How does PC apply lessons learned during the QA/QC audit to enhance its program?</p> <p>iii. What specific corrective actions has PC put in place as a result of the QA/QC completed in 2021 for asset inspections?</p>	Jessica McHale	8/10/2022	8/15/2022	8/15/2022		<p>The Company assumes that the reference to "PC" is intended to be a reference to PacifiCorp. Based on the foregoing assumption, the Company responds as follows:</p> <p>i. Please refer to Attachment OEIS 2.3 which provides the results of the quality assurance (QA) / quality control (QC) audits performed in 2021.</p> <p>Within the attached file, PacifiCorp has broken out the QA/QC by inspection type Note: when reviewing records or program management documents, the completion of an intrusive test inherently includes a detailed inspection as a component.</p> <p>ii. Lessons learned can be captured when audits are performed. PacifiCorp's equipment inspection process may be reviewed as part of external audits, such as those conducted in coordination with California Public Utilities Commission (CPUC) staff, or internal audits such as those conducted by insurance carriers or other internal departments. Additionally, PacifiCorp field inspection services has a yearly training, where all inspectors meet, lessons learned are reviewed and training is updated.</p> <p>iii. In 2021, the Company conducted a QA review to identify potential misalignment with policies and procedures by evaluating trends in reported conditions and looking at outliers. Through this QA review, PacifiCorp has been able to identify updates to Procedure 069 and update inspector training. This QA process is planned to continue annually and will support continual improvement of Asset Management policies and procedures.</p>			
89	OEIS	OEIS-PC-22-002	OEIS-PC-22-002	4	OEIS Data Request 4.4	<p>a. Regarding PacifiCorp's use of elevated fire risk (EFR) settings for reclosers:</p> <p>i. Provide the thresholds and/or conditions used by PC to decide when EFR settings are enabled, including PC's decision-making for implementing such settings.</p> <p>ii. Provide the statistics of the reliability impacts made in 2021 through the use of EFR settings (i.e., number of outages, duration of outages, number of customers impacted when EFR settings were enabled).</p> <p>iii. Provide the estimated number of ignitions reduced/prevented through the use of EFR settings in 2021.</p>	Jessica McHale	8/10/2022	8/15/2022	8/15/2022		<p>The Company assumes that the reference to "PC" is intended to be a reference to PacifiCorp. Based on the foregoing assumption, the Company responds as follows:</p> <p>i. PacifiCorp's meteorology team assign district-level wildfire risk based on an assessment of the Geographic Area Coordination Center's (GACC) 7-Day Significant Fire Potential product based on publicly available fuels information and weather forecast data:</p> <p>Meteorology provides outputs via a daily Systems Impact Forecast Matrix. Wildfire risk that falls within significant (orange) and extreme (red) risk are further evaluated by meteorology to include a review of fuels and fire weather forecasts and observations. When moving into an elevated, significant, or extreme wildfire risk, meteorology will perform additional review of fuels and fire weather forecasts and observations, including by using some or all of the additional metrics and methods outlined in the tables below:</p> <p>If there is conflicting or inconsistent data or forecasts, meteorology may escalate to senior power delivery management for discussion, evaluation, and resolution, to determine the best estimation of an appropriate wildfire risk assessment in a particular area.</p> <p>Meteorology will provide a list identifying circuits of concern. Meteorology and operations will discuss the circuit level of concerns which may involve an entire circuit or a portion of a circuits to assist with determining an appropriate level of protection device settings.</p> <p>Upon receipt of the circuits and devices that fall within elevated risk criteria, engineering and technical services</p>			

Count	Party Name	DR Set #	Data Request	Question No.	Question ID	Question Text	Requestor	Date Received	Due Date	Date Sent	WMP Section	Response	Number of Attachments	Attachment Name	NDA Required
90	CalPA	2022WMP-20	2022-WMP	1	CalPA Data Request 20.1	<p>The following questions relate to your 2022 WMP Update resubmission (page citations refer to the clean, revised version, dated July 15, 2022).</p> <p>On page 180 of PacifiCorp's 2022 WMP Update resubmission, PacifiCorp states that:</p> <p>In general PacifiCorp estimates that undergrounding costs range between \$1 million - \$6 million per line mile based on existing potential projects evaluated to date. However, PacifiCorp recognizes that the range could be much bigger depending on each project and the specific location evaluated.</p> <p>(a)Please identify and describe each significant factor that may affect the accuracy of unit cost estimates in your 2022 WMP Update resubmission, for installing underground conductor.</p> <p>(b)Please provide the analysis and workpapers used to develop the unit cost estimate in your 2022 WMP Update resubmission for installing underground conductor.</p> <p>(c)Please identify a potential project that PacifiCorp has evaluated to date, where PacifiCorp estimated unit costs close to \$1 million per line mile.</p> <p>(d)Please describe the characteristics of the project identified in subpart (c) that contributed to the relatively low unit costs.</p> <p>(e)Please identify a potential project that PacifiCorp has evaluated to date, where PacifiCorp estimated unit costs close to \$6 million per line mile.</p>	Charles Madison Carolyn Chen Layla Labagh	8/15/2022	8/18/2022	8/18/2022		<p>(a)While PacifiCorp has not performed a detailed cost analysis of this specific project, the spend was estimated based on previous experience with undergrounding conductor and based on California investor-owned utility (IOU) projections, as show in Figure 1 below. Significant factors that may affect cost are geology, cultural surveying, cultural monitoring services (if needed), environmental surveys, environmental monitoring services (if needed), environmental offsetting activities (if needed), permitting, significant vegetation work, existing right-of-way (ROW), other utility facilities, and customer density.</p> <p>Figure 1 : IOU projection of costs as per : https://www.cpuc.ca.gov/industries-and-topics/electrical-energy/infrastructure/electric-reliability/undergrounding-program-description/cpuc-rule-20-undergrounding-programs----faqs</p> <p>(b)PacifiCorp did not prepare formal work papers and / or perform analysis for these estimates, however, PacifiCorp did review the California Public Utilities Commission provided estimates from the IOUs, as shown in Figure 1 above.</p> <p>(c)Please refer to the Mt. Shasta underground project on circuit 5G79 provided in Figure 2 below:</p> <p>Figure 2: Map of Underground projects identified to date.</p> <p>(d)The characteristics of this project which contributed to the relatively low cost units are:</p> <ul style="list-style-type: none"> •Geology – no wetland or heavy rock. •Cultural surveying – previously completed along route. •Cultural monitoring services (if needed) – based on survey, not needed. •Environmental surveys – little to no vegetation. •Environmental monitoring services (if needed) – not expected. •Environmental offsetting activities (if needed) – not expected. 			
91	CalPA	2022WMP-20	2022-WMP	2	CalPA Data Request 20.2	<p>The following questions relate to your 2022 WMP Update resubmission (page citations refer to the clean, revised version, dated July 15, 2022).</p> <p>On page 181 of PacifiCorp's 2022 WMP Update resubmission, PacifiCorp states that:</p> <p>PacifiCorp has completed the engineering design phase on several higher priority circuits, which includes the cost evaluation of covered conductor versus undergrounding, and identified two projects where undergrounding provided the following benefits...</p> <p>Please provide the following information about each of the potential undergrounding projects for which "PacifiCorp has completed the engineering design phase".</p> <p>(a)Circuit name.</p> <p>(b)Circuit-segment (i.e., zone of protection) ID number.</p> <p>(c)Circuit voltage.</p> <p>(d)HFTD tier of the portion of the circuit that would be undergrounded in the potential project.</p> <p>(e)Number of circuit-miles that are included in the potential undergrounding project.</p> <p>(f)Number of line-miles that are included in the potential undergrounding project.</p> <p>(g)Number of phases on the circuit.</p> <p>(h)PacifiCorp's "cost evaluation of covered conductor versus undergrounding" for the potential project.</p> <p>(i)Please provide any workpapers PacifiCorp used to estimate the cost of installing underground conductor.</p> <p>Please provide any workpapers PacifiCorp used to estimate the cost of installing</p>	Charles Madison Carolyn Chen Layla Labagh	8/15/2022	8/22/2022	8/18/2022		<p>(a)PacifiCorp has provided the ZOP ID # in Figure 3 and Figure 4 below. It is important to note that some zone of protections will be broken up into more zone of protections while some new underground lines will be new zones of protections, no ID # are assigned for these new segments yet:</p> <p>Figure 3: Map of Mt. Shasta Underground project identified to date with ZOP IDs.</p> <p>ZOP ID List of highlighted project area: 873702, 1170329, 1170328, 1170327, 1111016, 1111008, 2833328, 7248411, 1111017, 2675705, 1111034, 3141963, 3141965, 1600873, 3141959, 2954525, 1111015, 2954521, 2954523, 1111012, 3141961, 1111013, 3141931, 3141933, 3141935, 1114463, 3141937, 3141939, 1114465, 3141943, 3141945, 1114466, 3142439, 3142441, 1561067, 3142443, 1111011, 3141957, 3141953, 1111038, 3142437, 3142431, 1111037, 3142433, 1111036, 1111035, 3142435, 1111009, 3142429, 3142427, 1111018, 3141955, 1111014, 3141947, 1114467, 3142445, 3142447, 1111043, 3142449, 1600874, 3141921, 3141919, 1111042, 3141923, 1111041, 3141917, 3141913, 1111010, 3141951, 3141949, 1111033, 3141915, 1111040, 3141941, 1114464, 7248413, 1111007, 836399, 2674881, 1114461, 3141927, 3141925, 1114460, 3141929, 1114462, 836389, 2954155, 2954153, 836391, 836387, 2954151, 2954149, 1600872, 836400, 6247219, 1111039</p> <p>Figure 4: Map of Weed Underground project identified to date with ZOP IDs.</p> <p>ZOP ID List of highlighted project area: 995189, 995164, 1015921, 1022737, 1027399, 995187, 995634, 3190130, 995632, 998671, 995575, 6982246, 3190148, 995574, 995581, 4472185</p>			

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92	CalPA	2022WMP-20	2022-WMP	3	CalPA Data Request 20.3	The following questions relate to your 2022 WMP Update resubmission (page citations refer to the clean, revised version, dated July 15, 2022). For each of the two "identified" underground projects addressed in the previous question: (a)Please identify the underground construction method selected. (b)Please provide the analysis and work papers used to evaluate and compare different underground construction methods. (c)Please state the forecast total cost of the project. (d)Please provide the estimated cost per line-mile. (e)Please provide the estimated cost per circuit-mile. (f)Please provide the number of phases on each circuit.	Charles Madison Carolyn Chen Layla Labagh	8/15/2022	8/18/2022	8/18/2022		The Company assumes that the reference to "in the previous question" is intended to be a reference to CalPA Data Request 20.2. Based on the foregoing assumption, the Company responds as follows: (a)For PacifiCorp undergrounding projects, open trench and/or directional drilling construction methods may be used. (b)Underground construction methods are selected by the construction company doing the work, PacifiCorp does not prescribe the methodology. (c)PacifiCorp forecasts at the project level, where a single Line Rebuild project can include covered conductor and undergrounding. Therefore, PacifiCorp cannot provide a forecast for the underground segment of the project but has provided the entire project forecast for the two projects which currently include undergrounding. Mt. Shasta Underground Project (Circuit: 5G79) – Entire 11.3 miles = \$9,928,893 forecast which includes 6.9 miles of underground and 4.4 miles of covered conductor. Weed Substation Project (Circuit: 5G45, 5G83) – Entire 22.5 miles = \$14,292,002 forecast which includes 0.25 miles of underground and 22.25 miles of covered conductor. (d)Mt. Shasta Underground Project (Circuit: 5G79) – underground is forecast to cost \$1 million per mile (\$ million/mile). Weed Substation Project (Circuit: 5G45, 5G83) – underground is forecast to cost \$2 million/mile.			
93	CalPA	2022WMP-20	2022-WMP	2	1st Supplemental Response to CalPA Data Request 20.2	The following questions relate to your 2022 WMP Update resubmission (page citations refer to the clean, revised version, dated July 15, 2022). On page 181 of PacifiCorp's 2022 WMP Update resubmission, PacifiCorp states that: PacifiCorp has completed the engineering design phase on several higher priority circuits, which includes the cost evaluation of covered conductor versus undergrounding, and identified two projects where undergrounding provided the following benefits... Please provide the following information about each of the potential undergrounding projects for which "PacifiCorp has completed the engineering design phase". (a)Circuit name. (b)Circuit-segment (i.e., zone of protection) ID number. (c)Circuit voltage. (d)HFTD tier of the portion of the circuit that would be undergrounded in the potential project. (e)Number of circuit-miles that are included in the potential undergrounding project. (f)Number of line-miles that are included in the potential undergrounding project. (g)Number of phases on the circuit. (h)PacifiCorp's "cost evaluation of covered conductor versus undergrounding" for the potential project. (i)Please provide any workpapers PacifiCorp used to estimate the cost of installing underground conductor. Please provide any workpapers PacifiCorp used to estimate the cost of installing	Charles Madison Carolyn Chen Layla Labagh	8/15/2022	8/22/2022	8/22/2022		Further to the Company's response to CalPA Data Request 20.2 dated August 18, 2022 which provided the Company's responses to subparts (a) through (m), the Company now provides this 1st Supplemental response to provide its response to subpart (n): (n)Please refer to Attachment CalPA 20.2 1st Supplemental which provides circuit line layers in the following two files: Project 1 (Weed 5G45/5G8) – see file "Project1.gdb.zip", and Project 2 (Mount Shasta 5G79) – see file "Project2.gdb.zip".	1	Attach CalPA 20.2 1st SUPP	

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94	CalPA	2022WMP-22	2022-WMP	1	CalPA Data Request 22.1	<p>PacifiCorp reports, in cell S5, a total of 926 intrusive pole inspections that were completed as of Q2. PacifiCorp forecasted completing 2,380 intrusive pole inspections by the end of Q2.3</p> <p>a) Please explain why PacifiCorp has failed to achieve its Q2 target for this intrusive pole inspection initiative. Identify each factor that contributed to PacifiCorp's missed target for this initiative in the first half of 2022.</p> <p>b) Does PacifiCorp plan to conduct the remaining 1,454 intrusive pole inspections in Q3 of 2022?</p> <p>c) If the answer to part (b) is "yes," describe PacifiCorp's plan to finish the uncompleted intrusive pole inspections.</p> <p>d) If the answer to part (b) is "no," explain why not.</p> <p>e) Does PacifiCorp expect to be back on track with its Q3 target for intrusive pole inspections by the end of Q3?</p> <p>f) If the answer to part (e) is "no," explain why not.</p> <p>g) State the specific date when PacifiCorp expects completion of its intrusive pole inspections to be back on track (consistent with the targets set in PacifiCorp's 2022 WMP Update Revision).</p>	Charles Madison Carolyn Chen Layla Labagh	8/29/2022	9/6/2022	9/6/2022		<p>(a)PacifiCorp looks at its inspection plan from a yearly perspective not quarterly. Although there are monthly requirements for distribution, the Company's inspectors often inspect multiple states and regions in one year. While PacifiCorp's aim is to provide an accurate quarterly target months prior to the start of the planned inspection year, these targets are only projections based on data available at the time the plan is generated. There are several factors that can affect the data and result in the quarterly target being lower which include district management requests, personnel shortages/absences, and access issues (weather, fire, customers, etc.). Several of these factors occurred during the intrusive pole inspections to be completed in Q2 2022 which resulted in the quarterly target not being met.</p> <p>In addition to the above mentioned factors, the pole test and treat counts in this report include both transmission and distribution together which are inspected on different cycles and at different times. This is unlike the other inspection types, which are split and represented in different rows. This resulted in a higher quarterly target projection for Q2 2022 which also contributed in quarterly target not being met.</p> <p>(b)PacifiCorp has updated current pole test and treat counts as of August 29, 2022 at 8pm. Note: at the time of providing the information in the table below, there is still one month left in Q3 2022, but the Company is on target to finish all inspections. QuarterCountNotes 2022-Q1489 2022-Q2437 2022-Q31,506as of August 29, 2022, 8pm 2,432</p> <p>(c)Please refer to the Company's responses to subparts (a) and (b) above.</p>			
95	CalPA	2022WMP-22	2022-WMP	2	CalPA Data Request 22.2	<p>Please provide the number of intrusive pole inspections that have resulted in a pole rejection in the first half of 2022.</p> <p>b) Please disaggregate the figure in part (a) by HFTD tier, as defined above in definitions O through S.</p> <p>c) Please provide the number of rejected poles that have been replaced as a result of intrusive pole inspections in the first half of 2022</p> <p>d) Please disaggregate the figure in part (c) by HFTD tier, as defined above in definitions O through S.</p> <p>e) Please provide the number of rejected poles that have been reinforced as a result of intrusive pole inspections in the first half of 2022.</p> <p>f) Please disaggregate the figure in part (e) by HFTD tier, as defined above in definitions O through S.</p>	Charles Madison Carolyn Chen Layla Labagh	8/29/2022	9/6/2022	9/6/2022		<p>(a)PacifiCorp has entered 102 conditions related to pole decay, reject, restore, replace, damage within the first half of 2022.</p> <p>(b) Please refer to the table provided below:</p> <p>CORRECTEDOPENTOTAL 2022-Q1131831 CA-NON-TIER7613 CA-TIER-251217 CA-TIER-311 2022-Q286371 CA-NON-TIER61723 CA-TIER-224648 Grand Total2181102</p> <p>(c)Please refer to the Company's response to subpart (b) above, specifically the "CORRECTED" column in the provided table.</p> <p>(d)Please refer to the Company's response to subpart (b) above.</p> <p>(e)Please refer to the Company's response to subpart (b) above.</p>			
96	CalPA	2022WMP-22	2022-WMP	3	CalPA Data Request 22.3	<p>PacifiCorp reports, in cell S13, a total expenditure of \$14,279 for circuit breaker maintenance, repair, and replacement work as of Q2. PacifiCorp forecasted an expenditure of \$197,179 by the end of Q2.4</p> <p>a) Please explain why PacifiCorp has failed to achieve its Q2 cost target for this circuit breaker maintenance, repair, and replacement initiative. Identify each factor that contributed to PacifiCorp's missed cost target for this initiative in the first half of 2022.</p> <p>b) Does PacifiCorp expect to be on track with its Q3 cost forecast for circuit breaker maintenance, repair, and replacement by the end of Q3?</p> <p>c) If the answer to part (b) is "yes," describe PacifiCorp's plan to meet its cost forecast for Q3.</p> <p>d) State the specific date when PacifiCorp expects completion of circuit breaker maintenance, repair, and replacement work to be back on track (consistent with the targets set in PacifiCorp's 2022 WMP Update Revision).</p> <p>e) How did PacifiCorp arrive at the cost estimate of \$402,000 by the end of Q4?</p> <p>f) How did PacifiCorp arrive at the cost estimate of \$197,179 by the end of Q2?</p>	Charles Madison Carolyn Chen Layla Labagh	8/29/2022	9/6/2022	9/6/2022		<p>(a)The financial target for the circuit breaker maintenance, repair, and replacement initiative is based on historical spending for breaker work in California and not inclusive of specific targeted units unless there is a known future item that has been identified at the time the capital plan is created. This year, PacifiCorp has not experienced circuit breaker (CB) maintenance activity at a level that is keeping pace with the historical trend.</p> <p>(b)Due to the explanation provided in the Company's response to subpart (a) above on how PacifiCorp estimates the target along with the maintenance activity experienced so far this year, the Company will only know if the initiative will be on track by the end of Q3 2022.</p> <p>(c)Not applicable.</p> <p>(d)PacifiCorp expects to meet the annual target for this initiative on December 31, 2022.</p> <p>(e)PacifiCorp used historical spending in California to estimate the Q4 2022 target.</p> <p>(f)PacifiCorp used historical spending in California to estimate the Q2 2022 target.</p>			

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97	CalPA	2022WMP-22	2022-WMP	4	CalPA Data Request 22.4	a) Please provide the number of circuit breakers that have been maintained, repaired, or replaced in the first half of 2022. b) Please disaggregate the figure in part (a) by HFTD tier, as defined above in definitions O through S.	Charles Madison Carolyn Chen Layla Labagh	8/29/2022	9/6/2022	9/6/2022		(a)PacifiCorp currently tracks and reports only a financial target for the circuit breaker (CB) maintenance, repair, and replacement initiative. The Q1 2022-Q2 2022 expenditure for CB maintenance and repair is associated with work on 19 CBs. The Q1 2022-Q2 2022 expenditure for CB replacements is associated with work on two CBs. (b)As mentioned in PacifiCorp's 2022 Wildfire Mitigation Plan (WMP) Update, the CB maintenance, repair, and replacement initiative is included as part of the maintenance programs as defined on Sections 7.3.4.15; please refer to item 3 of aforementioned section for more information on prioritization. Disaggregated figures are provided below: CB maintenance and repair: •Tier 2: 3 (three) circuit breakers •Non-High-Fire Threat District (HFTD): 16 CBs CB replacements: •Non-HFTD: two CBs			
98	CalPA	2022WMP-22	2022-WMP	5	CalPA Data Request 22.5	PacifiCorp reports, in cell S15, a total expenditure of \$224,847 for crossarm maintenance, repair, and replacement work as of Q2. PacifiCorp forecasted an expenditure of \$136,000 by the end of Q2. ⁷ a) Please explain why PacifiCorp has failed to achieve its Q2 cost target for this crossarm maintenance, repair, and replacement initiative. Identify each factor that contributed to PacifiCorp's missed cost target for this initiative in the first half of 2022. b) Does PacifiCorp expect to be on track with its Q3 cost forecast for crossarm maintenance, repair, and replacement by the end of Q3? c) If the answer to part (b) is "yes", describe PacifiCorp's plan to meet its cost forecast. d) State the specific date when PacifiCorp expects completion of its crossarm maintenance, repair, and replacement work to be back on track (consistent with the targets set in PacifiCorp's 2022 WMP Update Revision). e) How did PacifiCorp arrive at the cost estimate of \$272,000 by the end of Q4? ⁸ f) How did PacifiCorp arrive at the cost estimate of \$136,000 by the end of Q2? ⁹	Charles Madison Carolyn Chen Layla Labagh	8/29/2022	9/6/2022	9/6/2022		(a)As shown in cells S15 and O15 of file "PC_2022_Q2QIU_R0.XLSX", PacifiCorp's expenditure crossarm maintenance, repair, and replacement spend in Q1 2022-Q2 2022 exceeded the projected Q1 2022-Q2 2022 progress cost target. Cost targets are built utilizing historical activity of crossarm replacement. Often times, the need to maintain or replace a crossarm is the direct result of sudden, unexpected or emergent circumstances (weather related, car hits pole, tree through line, etc.) and therefore this category of work is subject to higher or lower than planned activity. (b)Not applicable. (c)Not applicable. (d)Not applicable. (e)Cost targets are built utilizing historical activity of crossarm replacement. Often times, the need to maintain or replace a crossarm is the direct result of sudden, unexpected or emergent circumstances (weather related, car hits pole, tree through line, etc.) and therefore this category of work is subject to higher or lower than planned activity. (f)Please refer to the Company's response to subpart (e) above.			
99	CalPA	2022WMP-22	2022-WMP	6	CalPA Data Request 22.6	a) Please provide the number of crossarms that have been maintained, repaired, or replaced in the first half of 2022. b) Please disaggregate the figure in part (a) by HFTD tier, as defined above in definitions O through S.	Charles Madison Carolyn Chen Layla Labagh	8/29/2022	9/6/2022	9/6/2022		(a)PacifiCorp currently tracks and reports only a financial target for the maintenance, repair or replacement of crossarms initiative. The volume of crossarms represented by the financial number provided for Q1 2022-Q2 2022 is 38. Note: this figure does not include crossarms replaced during pole replacements, highway relocations, capital reliability projects, or any other crossarm replaced directly on a capital project. (b)As mentioned in the Company's response to subpart (a) above, the target for the maintenance, repair or replacement of crossarms initiative that PacifiCorp uses in the quarterly initiative update is financial information. In addition, PacifiCorp does not require the high-fire threat district (HFTD) tier information from the field of the crossarm work and therefore it is not available for disaggregation.			
100	CalPA	2022WMP-22	2022-WMP	7	CalPA Data Request 22.7	PacifiCorp reports, in cell S36, a total expenditure of \$4,636,947 for vegetation cycle clearing, pruning, and corrective work as of Q2. PacifiCorp forecasted an expenditure of \$3,000,000 by the end of Q2. ¹⁰ a) Please explain why PacifiCorp has failed to meet its Q2 cost target for this vegetation cycle clearing, pruning, and corrective work initiative. Identify each factor that contributed to PacifiCorp's missed cost target for this initiative in the first half of 2022. b) Does PacifiCorp expect to be on track with its Q3 cost forecast for vegetation cycle clearing, pruning, and corrective work by the end of Q3? c) If the answer to part (b) is "yes," describe PacifiCorp's plan to meet its cost forecast. d) State the specific date when PacifiCorp expects completion of vegetation cycle clearing, pruning, and corrective work to be back on track (consistent with the targets set in PacifiCorp's 2022 WMP Update Revision). e) How did PacifiCorp arrive at the cost estimate of \$5,171,000 by the end of Q4 ¹¹ ? f) How did PacifiCorp arrive at the cost estimate of \$3,000,000 by the end of Q2 ¹² ?	Charles Madison Carolyn Chen Layla Labagh	8/29/2022	9/6/2022	9/6/2022		(a)PacifiCorp exceeded the Q2 2022 cost target due to the tree work being completed faster than originally anticipated for the majority of the quarter. (b)No, the Company is already ahead of the forecast. (c)Not applicable. (d)December 31, 2022. (e)PacifiCorp utilized past actuals to inform the forecast. The forecast is based on actual cost per mile by work specification. (f)PacifiCorp front-loaded the spend distribution based on risk prioritization.			

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101	CalPA	2022WMP-22	2022-WMP	8	CalPA Data Request 22.8	PacifiCorp reports, in cell S35, a total of 562 line-miles of vegetation QA/QC work as of Q2. PacifiCorp forecasted a total of 1,169 line-miles by the end of Q2.13 a) Please explain why PacifiCorp has failed to meet its Q2 target for this vegetation QA/QC work initiative. Identify each factor that contributed to PacifiCorp's missed target for this initiative in the first half of 2022. b) Does PacifiCorp plan to conduct the remaining 562 line-miles of vegetation QA/QC work in Q3 of 2022? c) If the answer to part (b) is "yes," describe PacifiCorp's plan to finish the remaining 562 line-miles of vegetation QA/QC work. d) If the answer to part (b) is "no," explain why not. e) Does PacifiCorp expect to be on track with its Q3 cost forecast for vegetation QA/QC work by the end of Q3? f) If the answer to part (e) is "yes," describe PacifiCorp's plan to meet its cost forecast. g) State the specific date when PacifiCorp expects completion of vegetation QA/QC work to be back on track (consistent with the targets set in PacifiCorp's 2022 WMP Update Revision). h) How did PacifiCorp arrive at the forecast of 1,169 line-miles by the end of Q414? i) How did PacifiCorp arrive at the forecast of 1,169 line-miles by the end of Q215?	Charles Madison Carolyn Chen Layla Labagh	8/29/2022	9/6/2022	9/6/2022		(a)PacifiCorp overestimated its capacity to complete post audits as the tree work was completed. Competing factors such as customer interaction, contractor oversight, increased dieback (slowing down post audits and tree work in Q2 2022) decreased capacity of internal staff to conduct post audit activities. Wildfire response efforts have also impacted tree work and post audit actions recently. In addition, the Company filled quality assurance (QA) / quality control (QC) positions to increase post-audit capacity later in the year than anticipated. (b)Yes. (c)Currently, all tree work associated with this initiative is complete and available for post-audit. Adjusted forecast is to complete post-audit of remaining line miles by end of Q3 2022. As stated in the Company's response to subpart (a) above, PacifiCorp has hired additional staff to support post-audit activities and increase capacity to conduct post audits by internal staff. PacifiCorp plans to redirect resources to focus on remaining line miles as part of this initiative. A utility forester and two newly hired associate utility forester positions (referenced in the Company's response to subpart (a) above), will be focused on conducting post-audits. If needed, PacifiCorp will also utilize third party contractor resources to ensure post-audit activities associated with this initiative are completed. (d)Not applicable. (e)PacifiCorp has not forecasted costs by quarter associated with the QA/QC program, however, PacifiCorp will be on track with respect to miles post-audited by end of Q3 2022, as stated in the Company's response to subpart (c) above. (f)Please refer to the Company's response to subpart (c) above.			
102	CalPA	2022WMP-22	2022-WMP	9	CalPA Data Request 22.9	Regarding PacifiCorp's 2022 vegetation QA/QC initiative referenced in question (8): a) How many vegetation QA/QC audits were conducted in the first half of 2022? b) Please disaggregate the figure in part (a) by HFTD tier, as defined above in definitions O through S. c) Were HFTD areas prioritized over other areas for vegetation QA/QC audits in the first half of 2022? d) How many vegetation QA/QC audits in the first half of 2022 found that a corrective action was needed? e) How many supplemental tree trimming jobs occurred in the first half of 2022 as a result of a vegetation QA/QC audit? f) How many supplemental tree removal jobs occurred in the first half of 2022 as a result of a vegetation QA/QC audit?	Charles Madison Carolyn Chen Layla Labagh	8/29/2022	9/6/2022	9/6/2022		The remaining miles are anticipated to be post-audited by end of Q3 2022. The Company assumes that the reference to question (8) is intended to be a reference to CalPa Data Request 22.8. Based on the foregoing assumption, the Company responds as follows: (a)A distribution circuit or transmission line may be audited over the course of several weeks or months, consisting of several post-audit field visits as the tree work is completed. At the end of Q2 2022, PacifiCorp had completed post-audit activities associated with 17 lines (distribution and transmission lines) and six lines were in process of being audited. (b)Of the 17 lines where post-audits were completed (i.e., all line miles post audited), all 17 lines are categorized as Tier 2 lines by PacifiCorp. Of the six lines where post-audits were still underway, one line is categorized as Tier 3, and the remaining five lines categorized as Tier 2. (c)Yes, areas in the high-fire threat district (HFTD) were prioritized in the first half of 2022 for vegetation quality assurance (QA) / quality control (QC) audits. (d)Of the post-audits conducted or underway, corrective actions were identified on 16 lines. (e)292 prunes. (f)604 removals.			
103	CalPA	2022WMP-23	2022-WMP	1	CalPA Data Request 23.1	This question pertains to PacifiCorp's WMP Quarterly Initiative Update (QIU) for the 1st quarter of 2022, filed with Energy Safety on April 15, 2022 (Excel spreadsheet named "2022-04-15_PC_2022_Q1-QIU_R0.XLSX") (hereinafter Q1 2022 QIU). In the "Initiatives" tab of the Q1 2022 QIU, PacifiCorp reports the progress of 12 out of 35 initiatives with financial values instead of units of work completed (e.g., # of line miles inspected or # of QA/QC audits).3 Please provide a revised 1st quarter initiative update that contains non-financial units for initiative targets, quarterly projections, and actual work completed for each of the following:4 a) Quality assurance / quality control of inspections b) Centralized repository for data c) Circuit breaker maintenance and installation to de-energize lines upon detecting a fault d) Crossarm maintenance, repair, and replacement e) Mitigation of impact on customers and other residents affected during PSPS event f) A summarized risk map that shows the overall ignition probability and estimated wildfire consequence along the electric lines and equipment g) Forecast of a fire risk index, fire potential index, or similar h) Personnel monitoring areas of electric lines and equipment in elevated fire risk conditions i) Community engagement j) LiDAR inspections of vegetation around distribution electric lines and equipment k) LiDAR inspections of vegetation around transmission electric lines and equipment l) Vegetation management to achieve clearances around electric lines and equipment	Charles Madison Carolyn Chen Layla Labagh	9/2/2022	9/13/2022	9/14/2022		The wildfire mitigation plan (WMP) guidelines do not require non-financial units for initiative targets, quarterly projections and actual work completed, and for many of the initiatives non-financial units are not formally tracked in a record system. (a)The PacifiCorp quality assurance (QA) / quality control (QC) of inspections program is not planned on a quarterly timeline. At the beginning of the year, field inspection support (FIS) identifies the work to be performed in each district. From that point, PacifiCorp FIS knows how many facility points will be inspected within the year, as well as how many facility points the inspection contractor and FIS team needs to complete to meet the requirements set for the inspections. To support the completion of annual targets, there is a bi-weekly call held to monitor status and progression of the inspections and the QA/QC. (b)At PacifiCorp, the spend associated with the centralized repository for data initiative is for the resources to start development of the centralized share point site for all filings, to support consistent and clarity of the data provided for field audits and desktop verifications. The resource's tasks are largely responsive to filings and data requests, therefore there are no units of work completed for the centralized repository for data initiative. (c)PacifiCorp's narrative for the circuit breaker maintenance and installation to de-energize lines upon detecting a fault initiative describes the standard maintenance of circuit breakers performed, similarly to San Diego Gas and Electric (SDG&E), Southern California Edison (SCE) and Pacific Gas and Electric (PG&E) narratives, as part of other inspection programs. The work for this program is completed as part of other initiatives and not separately tracked. (d)Similar to other utilities such as SDG&E, SCE, PG&E, Bear Valley Electric Service, Inc. (BVES), Liberty Utilities, PacifiCorp does not track units for this type of work. Crossarm replacement is completed: immediately for A-imminent threats, within 30 days for priority As, as the need is identified through maintenance. Until the			

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104	CalPA	2022WMP-23	2022-WMP	2	CalPA Data Request 23.2	In the "Initiatives" tab of the Q2 2022 QIU, PacifiCorp reports the progress of 12 out of 35 initiatives with financial values instead of units of work completed (e.g., # of line miles inspected or # of QA/QC audits).5 Please provide a revised 2nd quarter initiative update that contains non-financial units for initiative targets, quarterly projections, and actual work completed for each of the following:6 a) Quality assurance / quality control of inspections b) Centralized repository for data c) Circuit breaker maintenance and installation to de-energize lines upon detecting a fault d) Crossarm maintenance, repair, and replacement e) Mitigation of impact on customers and other residents affected during PSPS event f) A summarized risk map that shows the overall ignition probability and estimated wildfire consequence along the electric lines and equipment g) Forecast of a fire risk index, fire potential index, or similar h) Personnel monitoring areas of electric lines and equipment in elevated fire risk conditions i) Community engagement j) LiDAR inspections of vegetation around distribution electric lines and equipment k) LiDAR inspections of vegetation around transmission electric lines and equipment l) Vegetation management to achieve clearances around electric lines and equipment	Charles Madison Carolyn Chen Layla Labagh	9/2/2022	9/13/2022	9/14/2022		Please refer to the Company's response to CalPA Data Request 23.1.			
105	CalPA	2022WMP-23	2022-WMP	3	CalPA Data Request 23.3	In the "Initiatives" tab of the Q2 2022 QIU, PacifiCorp reports that 11 of 35 WMP initiatives fail to meet Q2 targets.7, 8 According to the QIU template instructions, these initiatives should be reported as "Delayed," and must include any corrective actions needed to get back on track.9 Please revise your 2nd quarter initiative update with the appropriate initiative status for the following initiatives:10 a) Intrusive pole inspections b) Centralized repository for data c) Circuit breaker maintenance and installation to de-energize lines upon detecting a fault d) Covered conductor installation e) Crossarm maintenance, repair, and replacement f) Mitigation of impact on customers and other residents affected during PSPS event g) A summarized risk map that shows the overall ignition probability and estimated wildfire consequence along the electric lines and equipment h) Forecast of a fire risk index, fire potential index, or similar i) Community engagement j) Quality assurance / quality control of vegetation inspections k) Vegetation management to achieve clearances around electric lines and equipment	Charles Madison Carolyn Chen Layla Labagh	9/2/2022	9/13/2022	9/14/2022		Please refer to Attachment CalPA 23.3, file "2022-08-22_PC_2022_Q2-QIU_R0_CAL Advocates Data Request_20220912" which provides the Company's responses to subparts (a) through (d), (g), (h) and (j). (a)The intrusive pole inspections initiative is 61 percent behind plan. PacifiCorp processes are to plan the number of inspections by year and then the breakout by quarter is an estimate based on historical numbers. There was not enough activity in the first half of the year to meet the Q1 2022-Q2 2022 target, however, the number of inspections performed in Q3 2022 is increasing, and PacifiCorp expects to meet the annual target. (b)The centralized repository for data initiative is 75 percent behind plan. The planned spending was comprised of resource time, however, activities associated with this initiative were paused after personnel allocated to perform work left the Company causing underspend. Although PacifiCorp has been trying to hire new resources as a corrective action, the Company currently projects an underspend for this category in 2022. (c)The circuit breaker maintenance and installation to de-energize lines upon detecting a fault initiative is 93 percent behind plan. The financial target for the circuit breaker maintenance, repair, and replacement initiative is based on historical spending for breaker work in California and not inclusive of specific targeted units unless there is a known future item that has been identified at the time the capital plan is created. This year, PacifiCorp has not experienced circuit breaker maintenance activity at a level that is keeping pace with the historical trend. PacifiCorp plans to report underspend in this category. (d)The covered conductor installation initiative is 17 percent behind plan. PacifiCorp covered conductor projects in California have been impacted by material shortages, damages and evacuations due to recent fires, delays in permitting, as well as construction firms are facing resources constraints. PacifiCorp is currently assessing the impact on project schedules and evaluating alternatives to bring the project back on track.	1	Attach CalPA 23.3	
106	CalPA	2022WMP-23	2022-WMP	4	CalPA Data Request 23.4	In the "Initiatives" tab of the Q2 2022 QIU, PacifiCorp reports that 11 of 35 WMP initiatives fail to meet Q2 targets.11 For each of the following initiatives, please describe any corrective actions that PacifiCorp has taken or plans to take to ensure that the initiative meets targets in the 3rd and 4th quarters of 2022: a) Intrusive pole inspections b) Centralized repository for data c) Circuit breaker maintenance and installation to de-energize lines upon detecting a fault d) Covered conductor installation e) Crossarm maintenance, repair, and replacement f) Mitigation of impact on customers and other residents affected during PSPS event g) A summarized risk map that shows the overall ignition probability and estimated wildfire consequence along the electric lines and equipment h) Forecast of a fire risk index, fire potential index, or similar i) Community engagement j) Quality assurance / quality control of vegetation inspections k) Vegetation management to achieve clearances around electric lines and equipment	Charles Madison Carolyn Chen Layla Labagh	9/2/2022	9/13/2022	9/14/2022		Please refer to the Company's response to CalPA Data Request 23.5. The response to the Company's request and response relative is 55 percent ahead of plan, not behind plan.			

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107	OEIS	OEIS-PC-22-003	2022-WMP	1	OEIS Data Request 3.1	Covered Conductor Implementation (follow-up questions) a. In Data Request 002, Q02, Energy Safety requested PacifiCorp to explain, "How does PC plan to achieve its overall covered conductor target in 2022 (e.g., 112 miles in 2022)?" In response to this question, PacifiCorp provided information on its plans to contract with a Construction Management Partner early 2023. PacifiCorp also provided a graphical representation (figure 1) of the planned schedule for this work. i. In figure 1, construction of the 112 circuit miles targeted for 2022 is shown to be completed between January 7, 2022, and May 26, 2022. Has this work been completed? Was this work completed by this milestone? If the work was not completed by May 26 this year, explain why it was not completed. ii. If the targeted 112 circuit miles of covered conductor was not completed by May 26, 2022, will it be completed by the end of this year? If this work will not be completed by the end of this year, explain why not.	Joan Weber	9/8/2022	9/13/2022	9/14/2022		The Company assumes that the reference to "Data Request 002, Q02" is intended to be a reference to OEIS Data Request 2.2. Based on the foregoing assumption, the Company responds as follows: i. The graphical representation was to describe a typical project timeline and was not specific to any one of the 2022 covered conductor projects. The Q2 2022 quarterly initiative update states that 31 miles were planned to be completed by May 26, 2022, but 26 miles were actually completed. The Company did not complete five miles on time, however, the Company continues to work on the 2022 scope which will through December 31, 2022. PacifiCorp was impacted by material shortages, damages, and evacuations due to recent fires, delays in permitting, as well as construction firms which are also facing resources constraints. PacifiCorp is currently assessing the impact on project schedules and evaluating alternatives to bring the project back on track. ii. As stated in the Q2 2022 quarterly initiative update, PacifiCorp was planning to complete 31 miles of covered conductor by Q2 2022, and to complete the 112 line miles by end of calendar year. At this time, due to the reasons mentioned in the Company's response to subpart (i) above, PacifiCorp anticipates completing the full planned 112 miles by Q2 2023.			
108	OEIS	OEIS-PC-22-003	2022-WMP	2	OEIS Data Request 3.2	Pole Replacement Implementation a. PacifiCorp has set the target of replacing 2,020 poles by the end of this year. Will PacifiCorp be able to accomplish this goal by the end of 2022? What is the status of this program? How many poles have been replaced to date and when will the remaining poles be replaced?	Joan Weber	9/8/2022	9/13/2022	9/14/2022		(a) As of June 30, 2022, PacifiCorp has completed 612 pole replacements as reported on the Q2 2022 quarterly initiative update. PacifiCorp will continue to work on the pole replacement project through to the end of the year, and expects the 2,020 pole replacements to be completed by Q2 2023.			
109	OEIS	OEIS-PC-22-003	2022-WMP	3	OEIS Data Request 3.3	Provide RSE Values a. During a weekly call with PacifiCorp and Energy Safety, that took place on June 1, 2022, the following information was provided, "Last year we believed our LRAM would turn into a RSE generating machine, then in late 2021/early 2022 the company pivoted on what risk modeling looks like for us. We decided to change our approach to be in line with what the other utilities were doing using the Technosylva tools... Our goal now is to bring on Technosylva, we're working on a contract for the WRRM model." Provide an update on the status of your plan to acquire new modeling tools that will provide you with the ability to calculate RSE values. b. During this same call, PacifiCorp stated something along the lines that it "could probably provide qualitative risk reduction estimate with what we have now, but it wouldn't be a meaningful and sustainable number (i.e., qualitative)." Provide these risk reduction estimates for wildfire initiatives as best as possible. At a minimum, this should include covered conductor and undergrounding. If more time is required, provide an explanation and timeline for when PacifiCorp thinks it will be able to provide such estimates.	Joan Weber	9/8/2022	9/13/2022	9/14/2022		(a) PacifiCorp has completed procurement of Technosylva Wildfire Risk Reduction Model (WRRM) with planned release to operations and use for risk modeling and preliminary Risk-Spend Efficiency (RSE) calculations beginning in Q1 2023. PacifiCorp will continue to mature its RSE methodology based on these initial results and lessons learned from other utilities during working group meetings and benchmarking discussions. (b) Please refer to the table provided below. As discussed in the Company's response to subpart (a) above, PacifiCorp is currently updating its risk assessment and mitigation effectiveness methodologies. The information presented below is historical and subject to change as part of overall changes to RSE calculations used by PacifiCorp for project planning and prioritization: InitiativeAverage RSENoneTier 2Tier 3Territory Covered conductor4.322.364.277.453.20 Undergrounding1.450.941.452.261.16			
110	CalPA	2022WMP-24	2022-WMP	1	CalPA Data Request 24.1	According to PacifiCorp, in the first half of 2022, it conducted 926 intrusive pole inspections, which resulted in the rejection of 102 poles with conditions requiring corrective maintenance or replacement. ^{3,4} The resulting pole rejection rate is 11.01%. ⁵ PacifiCorp's historical systemwide pole rejection rate for intrusive pole inspections is between 2% and 4%. ⁶ a) Why was PacifiCorp's rejection rate in its intrusive pole inspections higher in the first half of 2022 than PacifiCorp's historical average? b) In 2022, has PacifiCorp initiated any supplemental or enhanced practices due to high pole rejection rates in its California territory? c) If the answer to (b) is "yes," please describe in detail what those supplemental or enhanced practices entail. d) If the answer to (b) is "no," why not? e) Does PacifiCorp plan to initiate any supplemental or enhanced practices in 2023 as a result of its 2022 pole rejection rates? f) If the answer to (e) is "yes," please describe the actions you plan to take in 2023.	Charles Madison Carolyn Chen Layla Labagh	9/13/2022	9/16/2022			(a) The rejection rate was higher since it was measured on a quarterly basis versus yearly basis. The historical average referenced in PacifiCorp's 2022 Wildfire Mitigation Plan (WMP) Revision, page 186, is based on a yearly average for rejection rate. Quarterly rejection rates can vary between quarters due to the specific sample of poles that were inspected thus far in that quarter. (b) No; supplemental or enhanced practices have not been implemented since historical rejection rates on a yearly basis have improved each year, meaning the rejection rates are trending downward. (c) Not applicable. (d) Please refer to Company's response to subpart (b) above. (e) Please refer to Company's response to subpart (b) above. (f) Not applicable.			

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111	CalPA	2022WMP-24	2022-WMP	2	CalPA Data Request 24.2	a) Please state the number of intrusive pole inspections that you performed in your California service territory in each year from 2018 to 2021. b) Please state the number of pole rejections resulting from intrusive pole inspections in your California service territory in each year from 2018 to 2021.	Charles Madison Carolyn Chen Layla Labagh	9/13/2022	9/16/2022			(a) YearNumber of intrusive pole inspections (PTT's) 20184,538 20192,237 20203,594 20214,246 (b) YearNumber of intrusive pole inspections (PTT's) 2018244 201995 2020136 2021141			
112	CalPA	2022WMP-24	2022-WMP	3	CalPA Data Request 24.3	Regarding PacifiCorp's practices and procedures for intrusive pole inspections in your California service territory: a) Has PacifiCorp established targets for pole rejection rates in its California service territory for 2022? b) If the answer to (a) is "yes," please provide the pole rejection rate target for PacifiCorp's California service territory for 2022. c) If the answer to (a) is "no," explain why not. d) As a standard practice, does PacifiCorp initiate any supplemental or enhanced practices if pole rejection rates exceed established targets or thresholds? e) If the answer to (d) is "yes," please describe in detail what those supplemental or enhanced practices entail. f) If the answer to (d) is "no," why not?	Charles Madison Carolyn Chen Layla Labagh	9/13/2022	9/16/2022			(a)No; targets have not been established for pole rejection rates in its California service territory in 2022. (b)Not applicable. (c)Although no targets have been established, PacifiCorp does monitor and review the percentage of pole rejection rates each year to determine if there are trends that are indicative that a procedure or practice needs to change. The expectation is that the percentage each year is similar to the previous year and indicative of the same or improved performance. (d)Please refer to Company's response to subpart (c) above. (e)Not applicable. (f)Please refer to Company's response to subpart (c) above.			
113	CalPA	2022WMP-24	2022-WMP	4	CalPA Data Request 24.4	In response to question 2b of CalAdvocates-PacifiCorp-2022WMP-22, PacifiCorp reports that 46 corrective work orders remained open in HFTD areas as of July 31, 2022.7 Please provide an Excel table of all 46 corrective notifications that includes the following information in separate columns. a) Notification identification (ID) number b) Circuit ID c) Circuit Name d) Circuit voltage e) Description of the problem that requires correction/maintenance f) Geographic latitude in decimal degrees g) Geographic longitude in decimal degrees h) Date the notification was created i) Priority level j) Due date of notification k) Date the notification was resolved, if applicable.	Charles Madison Carolyn Chen Layla Labagh	9/13/2022	9/16/2022			The Company assumes that the reference to "question 2b of CalAdvocates-PacifiCorp-2022WMP-22" is intended to be a reference to CalPA Data Request 22.2 subpart (b). Based on the foregoing assumption, the Company responds as follows: Please refer to Attachment CalPA 24.4 which provides corrective notification information. Note: in addition to the 46 corrective notifications in Q2 2022, PacifiCorp is also providing information on the 12 corrective notifications in Q1 2022 which, at the time of preparing this data request response, are still open.	1	Attach CalPA 24.4	
114	CalPA	2022WMP-24	2022-WMP	5	CalPA Data Request 24.5	On page 186, of PacifiCorp's 2022 WMP update revision, PacifiCorp states, "Accelerated schedule" is in reference to the timelines for conditions in high-fire threat district (HFTD) areas. When B conditions are found in Tier 3 or Tier 2 areas and pose a fire threat, the correction timeline is reduced from three years to six months, and one year, respectively. a) Please clarify what PacifiCorp means by "accelerated schedule" in the quote above. b) Please explain how an "accelerated schedule" referenced in the quote above differs from PacifiCorp's standard priority scheduling, including stating the specific timeframes or deadlines if possible. c) Does PacifiCorp's schedule for pole replacement work differ in HFTD Tier 3 areas versus HFTD Tier 2 areas? If so, please describe the differences. d) Does PacifiCorp's schedule for pole reinforcement work differ in HFTD Tier 3 areas versus HFTD Tier 2 areas? If so, please describe the differences.	Charles Madison Carolyn Chen Layla Labagh	9/13/2022	9/16/2022			(a)"Accelerated schedule" is in reference to the timelines for conditions in high-fire threat district (HFTD) areas. When B conditions are found in Tier 3 or Tier 2 areas and pose a fire threat, the correction timeline is reduced from three years to six months, and one year, respectively. (b)"Accelerated schedule" does not differ from the quote above from page 186 of PacifiCorp's 2022 Wildfire Mitigation Plan (WMP). PacifiCorp's Policy 192 includes these requirements. (c)Pole replacement conditions are considered fire threat in procedure 069 and have quicker expected completion times than non-fire threat conditions. A-priority pole replacement conditions generally have a 90-day correction day window, regardless of wildfire risk area. The one exception is when an imminent threat is present. In the case of an imminent threat, it would require correction immediately. For B conditions that are considered a fire threat, the timeline for correction in HFTD Tier 3 areas is six months, and for Tier 2 areas it is one year.			