



October 19, 2022

To: PacifiCorp
Allen Berreth, Vice President of Transmission and Distribution Operations

SUBJECT: Office of Energy Infrastructure Safety's Report on PacifiCorp's 2020 Substantial Vegetation Management Audit

Pursuant to the requirements of California Public Utilities Code Section 8386.3(c)(5)(C), the Office of Energy Infrastructure Safety (Energy Safety) has completed its final report on PacifiCorp's 2020 Substantial Vegetation Management (SVM) audit.

The attached report follows Energy Safety's publication of the SVM audit on August 24, 2022, and PacifiCorp's subsequent response on September 23, 2022. Pursuant to statutory requirements, a copy of this report is issued to PacifiCorp, published on Energy Safety's website,¹ and provided to the California Public Utilities Commission (CPUC).

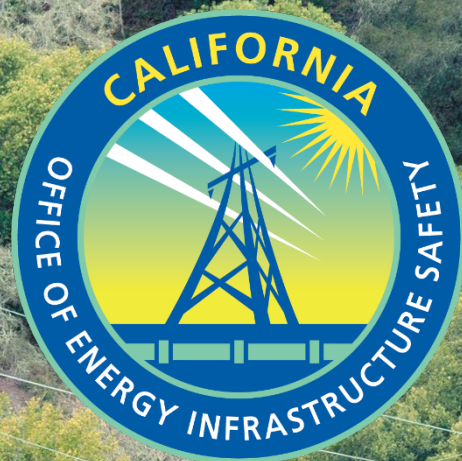
Sincerely,

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Attachment: PacifiCorp 2020 SVM Audit Report

¹ All documents related to PacifiCorp's 2020 SVM audit are available on Energy Safety's e-filing system under the "[2020-SVM](#)" docket number.



OFFICE OF ENERGY INFRASTRUCTURE SAFETY'S REPORT ON 2020 SUBSTANTIAL VEGETATION MANAGEMENT AUDIT

PACIFICORP

October 2022

TABLE OF CONTENTS

1. Background 1

2. 2020 SVM Audit Findings 2

3. Analysis of PacifiCorp’s Response 3

4. Conclusion 10

1. Background

Pursuant to Public Utilities Code section 8386.3(c)(5), Energy Safety must audit the vegetation management work performed by, or on behalf of, the electrical corporation. The audit shall specify any failure of the electrical corporation to fully comply with the vegetation management requirements in the wildfire mitigation plan. Energy Safety then grants the electrical corporation a reasonable time to correct and eliminate any deficiency specified in the audit. After evaluation of the electrical corporations response correcting or eliminating the deficiencies, Energy Safety must issue a report specifically describing any failure of the electrical corporation to substantially comply with the substantial portion of the vegetation management requirements in the electrical corporation's wildfire mitigation plan. This document is Energy Safety's final vegetation management report.

To conduct the 2020 Substantial Vegetation Management (SVM) audit, Energy Safety reviewed the vegetation management section and initiatives in PacifiCorp's 2020 Wildfire Mitigation Plan (WMP). For 19¹ of the 21 vegetation management WMP initiatives, Energy Safety evaluated PacifiCorp's quantitative commitments² and verifiable statements.³ Energy Safety then reviewed available information and requested additional documentation to support the assessment of whether PacifiCorp fully met its quantitative commitments and executed its verifiable statements.

Out of approximately 50 commitments and verifiable statements evaluated, Energy Safety found PacifiCorp noncompliant with 11 commitments and verifiable statements, resulting in 11 of the 19 applicable vegetation management initiatives in its 2020 WMP being noncompliant. Six of the 11 noncompliant initiatives were due to PacifiCorp's 2020 WMP referring to activities across several initiatives back to initiatives 5.3.5.2, 5.3.5.3, and 5.3.5.18, which were determined to be noncompliant upon Energy Safety's analysis. The remaining five noncompliant initiatives were due to initiative-specific discrepancies.

¹ PacifiCorp's 2020 WMP stated that it does not have a program under initiatives 5.3.5.9 and 5.3.5.10. Therefore, the SVM audit did not include those two initiatives.

² E.g., miles of lines to inspect, minimum work quality thresholds, etc.

³ E.g., holding public meetings with communities regarding future vegetation management activities, training personnel on utilities protocols, etc.

On August 24, 2022, Energy Safety published its 2020 SVM Audit⁴ identifying PacifiCorp's vegetation management failures, specified Corrective Actions required to resolve or explain the failures, and required PacifiCorp to provide a Corrective Action response. On September 23, 2022, PacifiCorp timely provided its Corrective Action response and included supporting documentation.⁵

2. 2020 SVM Audit Findings

Table 1 below summarizes Energy Safety's findings of noncompliance from PacifiCorp's 2020 SVM Audit.

Table 1: Noncompliant 2020 WMP Vegetation Management Initiatives and Corresponding Findings

Noncompliant Initiative Number	Finding
5.3.5.2	1i. PacifiCorp's transition to a computerized tracking system in 2020 prevents PacifiCorp from being able to provide documentation to support commitments made in its 2020 WMP.
5.3.5.2	1ii. PacifiCorp failed to provide documentation demonstrating that inspectors were directed to conduct Level 1 and Level 2 assessments to identify high risk trees along distribution lines in 2020.
5.3.5.2	1iii. PacifiCorp failed to provide documentation demonstrating that correction work is completed annually based on distribution inspections, including the identification of high-risk trees.
5.3.5.3	2i. PacifiCorp's transition to a computerized tracking system in 2020 prevents PacifiCorp from being able to provide documentation to support commitments made in its 2020 WMP.
5.3.5.3	2ii. PacifiCorp failed to provide documentation demonstrating that inspectors were directed to conduct Level 1 and Level 2 assessments to identify high risk trees along transmission lines in 2020.

⁴ PacifiCorp 2020 SVM Audit is published on Energy Safety's e-filing system in the 2020 WMP Substantial Vegetation Management Audits docket and available here:

<https://efiling.energysafety.ca.gov/EFiling/DocketInformation.aspx?docketnumber=2020-SVM> (accessed on October 19, 2022).

⁵ PacifiCorp 2020 SVM Audit Corrective Action Plan is published on Energy Safety's e-filing system in the 2020 WMP Substantial Vegetation Management Audits docket and available here:

<https://efiling.energysafety.ca.gov/EFiling/DocketInformation.aspx?docketnumber=2020-SVM> (accessed on October 19, 2022).

Noncompliant Initiative Number	Finding
5.3.5.3	2iii. PacifiCorp failed to provide documentation demonstrating that correction work is completed annually based on transmission inspections.
5.3.5.3	2iv. PacifiCorp targeted inspecting 345 miles of transmission lines, but provided documentation showing inspection of 322.65 miles, which is 22.35 miles short of the target.
5.3.5.4	3. PacifiCorp failed to provide documentation showing that vegetation management along electrical equipment was a part of PacifiCorp’s general emergency response plans and response to urgent conditions or red flag warning in 2020.
5.3.5.15	4i. PacifiCorp failed to provide documentation demonstrating it targeted areas of high density of vegetation for increased removal.
5.3.5.15	4ii. PacifiCorp failed to provide sufficient documentation demonstrating the completion of 3,195 miles treated.
5.3.5.21	5. PacifiCorp failed to clear 2,768 Local Responsibility Area (LRA) poles as targeted, only clearing 2,164 LRA poles in 2020.

3. Analysis of PacifiCorp’s Response

In PacifiCorp’s response, PacifiCorp stated it plans to develop a program tracker to address Energy Safety’s Corrective Actions to ensure consistency between the WMP and vegetation management operations. PacifiCorp referred to the program tracker in its responses to all Corrective Actions requiring PacifiCorp to “detail the steps it is taking to ensure vegetation management operations are consistent with statements made in the WMP” (see Table 2 below). PacifiCorp stated that this program tracker “will be used to monitor action items required to validate narratives in the 2022 WMP and future WMPs”⁶ in addition to tracking findings, corrective actions, or recommendations from Energy Safety.⁷ To develop the program tracker, PacifiCorp committed to reviewing “the WMP and identify[ing] qualitative commitments and verifiable statements.”⁸ In addition, the program tracker “will document

⁶ PacifiCorp 2020 SVM Audit Corrective Action Plan.pdf, page 23

⁷ PacifiCorp 2020 SVM Audit Corrective Action Plan.pdf, page 23

⁸ PacifiCorp 2020 SVM Audit Corrective Action Plan.pdf, page 13

associated records... that verifies and explains” the item tracked.⁹ The program tracker will have designated priorities, a tracked item owner, and a due date.¹⁰ PacifiCorp will monitor the timelines for completion on a monthly basis.¹¹ PacifiCorp’s response also included screenshots of the program tracker to further illustrate the program tracker’s various components.¹² PacifiCorp aims to complete the “2020 SVM Audit program tracker” by October 14, 2022.¹³ Finally, PacifiCorp stated that “the creation of an annual program tracker is the first step towards alignment between statements made in the WMP and the records available to prove them.”¹⁴

Energy Safety reviewed PacifiCorp’s Corrective Action response and determined that PacifiCorp sufficiently addressed seven of the 11 Corrective Actions. Table 2 sets forth Energy Safety’s analysis and determination regarding the sufficiency of each of PacifiCorp’s responses. For each corrective action, Energy Safety considered PacifiCorp’s implementation of the program tracker as weighing in favor of a finding of sufficiency.

Table 2: Summary of Energy Safety’s Analysis of PacifiCorp’s Response and Corrective Action

Corrective Action	Energy Safety’s Analysis of Response
1i. PacifiCorp shall detail the steps it is taking to ensure that its data management process allows PacifiCorp to readily verify and produce documentation showing its vegetation management programs are consistent with statements made in the WMP.	Sufficient- PacifiCorp updated “its mobile data management software through coordination with its third-party vendor to update data collection forms” to allow consistency with the WMP ¹⁵ in January 2022. ¹⁶ Energy Safety finds this response sufficiently addressed the Corrective Action.
1ii. PacifiCorp shall detail the steps it is taking to ensure that it can readily verify and produce	Sufficient- PacifiCorp’s response was that it “is developing a program tracker.” ¹⁷ PacifiCorp also committed to update work release forms to

⁹ PacifiCorp 2020 SVM Audit Corrective Action Plan.pdf, page 23

¹⁰ PacifiCorp 2020 SVM Audit Corrective Action Plan.pdf, page 23

¹¹ PacifiCorp 2020 SVM Audit Corrective Action Plan.pdf, page 23

¹² PacifiCorp 2020 SVM Audit Corrective Action Plan.pdf, page 24

¹³ PacifiCorp 2020 SVM Audit Corrective Action Plan.pdf, page 11

¹⁴ PacifiCorp 2020 SVM Audit Corrective Action Plan.pdf, page 24

¹⁵ PacifiCorp 2020 SVM Audit Corrective Action Plan.pdf, page 12

¹⁶ PacifiCorp 2020 SVM Audit Corrective Action Plan.pdf, page 11

¹⁷ PacifiCorp 2020 SVM Audit Corrective Action Plan.pdf, page 5

Corrective Action	Energy Safety's Analysis of Response
documentation showing its vegetation management programs are consistent with statements made in the WMP.	"explicitly align with the statements made in the 2020 WMP" by January 1, 2023. ¹⁸ Energy Safety finds this response sufficiently addressed the Corrective Action.
<p>1iii. PacifiCorp shall a) provide an explanation of why PacifiCorp failed to complete all correction work identified in inspections in 2020, b) provide an explanation of why PacifiCorp failed to provide documentation supporting inspections identifying vegetation management work of high risk trees along a distribution circuit in 2020 as requested in DR-096-SVM-20220516, and c) provide the steps it is taking to ensure its vegetation management operations are consistent with the statements made in the WMP.</p>	<p>Insufficient- In response to part a), PacifiCorp failed to complete all correction work identified in 2020 due to a resource shortage¹⁹ and "contracting."²⁰ Therefore, work was carried over to the first quarter of 2021.²¹ Energy Safety finds PacifiCorp's response that the delay was due to "resource shortage" and "contracting" without providing any supporting detail or PacifiCorp's efforts to mitigate such constraints to be insufficient. In response to part b) PacifiCorp stated that high risk trees were a subset of the data of the removed trees previously provided to Energy Safety, but the high risk trees were not differentiated.²² Also, PacifiCorp updated its data collection forms in January 2022²³ to better track the removal of high risk trees separately from other tree removals²⁴ and provided Energy Safety with a screenshot of the updated form.²⁵ Energy Safety finds PacifiCorp's response sufficiently addressed the corrective action part b), in addition to the general response provided for part c).</p>

¹⁸ PacifiCorp 2020 SVM Audit Corrective Action Plan.pdf, page 11

¹⁹ PacifiCorp 2020 SVM Audit Corrective Action Plan.pdf, page 5

²⁰ PacifiCorp 2020 SVM Audit Corrective Action Plan.pdf, page 13

²¹ PacifiCorp 2020 SVM Audit Corrective Action Plan.pdf, page 13

²² PacifiCorp 2020 SVM Audit Corrective Action Plan.pdf, page 5

²³ PacifiCorp 2020 SVM Audit Corrective Action Plan.pdf, page 11

²⁴ PacifiCorp 2020 SVM Audit Corrective Action Plan.pdf, page 14

²⁵ PacifiCorp 2020 SVM Audit Corrective Action Plan.pdf, page 14

Corrective Action	Energy Safety's Analysis of Response
	Due to PacifiCorp's response to part a) being insufficient, Energy Safety finds PacifiCorp's response did not sufficiently address the Corrective Action.
2i. PacifiCorp shall detail the steps it is taking to ensure that its data management process allows PacifiCorp to readily verify and produce documentation showing its vegetation management programs are consistent with statements made in the WMP.	Sufficient- PacifiCorp directed Energy Safety to the response to Corrective Action 1ii. ²⁶ Energy Safety finds this response sufficiently addressed the Corrective Action.
2ii. PacifiCorp shall detail the steps it is taking to ensure that it can readily verify and produce documentation showing its vegetation management programs are consistent with statements made in the WMP.	Sufficient- PacifiCorp directed Energy Safety to the response to Corrective Action 1ii. ²⁷ Energy Safety finds this response sufficiently addressed the Corrective Action.
2iii. PacifiCorp shall a) provide an explanation of why PacifiCorp failed to provide documentation showing that correction work is completed annually based on transmission inspections, and b) provide the steps it is taking to ensure its vegetation management operations	Sufficient- PacifiCorp explained that it did not have the capacity to link the forms for recording identified vegetation management work with the forms for recording when the work was completed in 2020, and suggested comparing the latitude and longitude to ensure work identified was completed. ²⁸ PacifiCorp committed to "develop[ing] a reporting function within its data management software to link" these

²⁶ PacifiCorp 2020 SVM Audit Corrective Action Plan.pdf, page 6

²⁷ PacifiCorp 2020 SVM Audit Corrective Action Plan.pdf, page 17

²⁸ PacifiCorp 2020 SVM Audit Corrective Action Plan.pdf, page 17

Corrective Action	Energy Safety's Analysis of Response
are consistent with the statements made in the WMP.	two forms. ²⁹ Energy Safety finds this response sufficiently addressed the Corrective Action.
<p>2iv. PacifiCorp shall a) explain why it failed to reach its target of miles of transmission line inspected in 2020, and b) provide the steps it is taking to ensure its vegetation management operations are consistent with the targets set in the WMP.</p>	<p>Insufficient- In PacifiCorp's response, it stated that the reason it missed the target was because "the miles [targeted] in the 2020 plan were estimates."³⁰ PacifiCorp's reasoning of treating the 2020 WMP targets as estimates is insufficient because California Public Utilities Code section 8386(c)(9) states that the WMPs "shall include all of the following... plans for vegetation management." Energy Safety considers WMP initiative targets as commitments, not estimates. Energy Safety's oversight of WMP compliance holds electrical corporations accountable to those commitments made in its WMPs. Additionally, PacifiCorp said the reason it failed to reach its target of transmission lines inspected was due to "resource limitations."³¹ Energy Safety finds this reasoning of "resource limitations," without any detail regarding the nature and source of such resource limitations nor PacifiCorp's efforts to mitigate such resource limitations in the future, insufficient to explain its missed target of transmission miles inspected. Finally, PacifiCorp states that "the transmission lines identified for inspection as part of this initiative were inspected."³² Energy Safety finds this response also did not sufficiently address the Corrective Action because the target stated in PacifiCorp's approved WMP is presented in units of miles, not in the number of</p>

²⁹ PacifiCorp 2020 SVM Audit Corrective Action Plan.pdf, page 17

³⁰ PacifiCorp 2020 SVM Audit Corrective Action Plan.pdf, page 17

³¹ PacifiCorp 2020 SVM Audit Corrective Action Plan.pdf, page 7

³² PacifiCorp 2020 SVM Audit Corrective Action Plan.pdf, page 17 and 18

Corrective Action	Energy Safety's Analysis of Response
	transmission lines inspected. Energy Safety finds this response did not sufficiently address the Corrective Action.
<p>3. PacifiCorp shall a) provide an explanation of why PacifiCorp was unable to provide documentation showing that vegetation management along electrical equipment was a subset of PacifiCorp's general emergency response plans and response to urgent conditions or red flag warnings in 2020, and b) provide the steps it is taking to ensure its vegetation management emergency response operations are consistent with the statements made in the WMP.</p>	<p>Sufficient- PacifiCorp concurred that vegetation management was not included in its general emergency response plans.³³ Additionally, PacifiCorp committed to updating the "documentation to explicitly include this information going forward,"³⁴ specifically updating its "PSPS Playbook."³⁵ Also, PacifiCorp stated it "is developing a program tracker,"³⁶ as described above. Furthermore, PacifiCorp provided supporting documentation showing vegetation management work as part of a PSPS event in 2020,³⁷ despite vegetation management not being explicitly included in its 2020 emergency response plans. Energy Safety finds this response sufficiently addressed the Corrective Action.</p>
<p>4i. PacifiCorp shall a) provide an explanation for why it failed to provide a plan for implementing a program for increased removal of high-risk trees in areas high density vegetation, b) if available, provide an example of the plan for the program implementation, and c)</p>	<p>Sufficient- PacifiCorp failed to provide a plan for implementing a program for increased removal of high-risk trees in areas of high density vegetation because "PacifiCorp currently has not developed a standalone plan" for this.³⁸ PacifiCorp further explained that the WMP statement "was intended to reference how vegetation management data was incorporated into LRAM and available to foresters."³⁹</p>

³³ PacifiCorp 2020 SVM Audit Corrective Action Plan.pdf, page 7

³⁴ PacifiCorp 2020 SVM Audit Corrective Action Plan.pdf, page 7

³⁵ PacifiCorp 2020 SVM Audit Corrective Action Plan.pdf, page 19

³⁶ PacifiCorp 2020 SVM Audit Corrective Action Plan.pdf, pages 7 and 8

³⁷ Statistics_History_Report_WRK17254854.xlsx

³⁸ PacifiCorp 2020 SVM Audit Corrective Action Plan.pdf, page 8

³⁹ PacifiCorp 2020 SVM Audit Corrective Action Plan.pdf, page 20

Corrective Action	Energy Safety's Analysis of Response
<p>detail the steps it is taking to ensure vegetation management operations are consistent with statements made in the WMP.</p>	<p>PacifiCorp stated that it “does not plan to create this plan [for implementing a program for increased removal of high-risk trees in areas of high density vegetation] and will remove it from the next WMP” due to resource constraints and other programs.⁴⁰ Energy Safety finds this response sufficiently addressed the Corrective Action.</p>
<p>4ii. PacifiCorp shall a) provide Energy Safety an Excel file or other form of documentation that is an output of PacifiCorp’s data management system that shows PacifiCorp completed 3,195 miles treated under this initiative or b) if PacifiCorp cannot provide the supporting documentation, explain why.</p>	<p>Insufficient- PacifiCorp stated that the reason it missed the target was because the miles targeted in the 2020 plan were estimates based on the miles completed in 2019.⁴¹ Attached to its response, PacifiCorp provided supporting documentation for the completion of 2,316 miles of corrective work,⁴² or approximately 72.5% of the target stated in the 2020 WMP. PacifiCorp’s reasoning of treating the 2020 WMP targets as estimates is insufficient because California Public Utilities Code section 8386(c)(9) states that the WMPs “shall include all of the following... plans for vegetation management.” Energy Safety considers WMP initiative targets as commitments, not estimates. Energy Safety’s oversight of WMP compliance holds electrical corporations accountable to those commitments made in its WMPs. Energy Safety finds this response did not sufficiently address the Corrective Action.</p>
<p>5. PacifiCorp shall a) provide an explanation of why it failed to clear 604 LRA poles in 2020, and b) detail the steps it is taking to ensure the</p>	<p>Insufficient- PacifiCorp explained that the LRA pole clearing program target was “an estimate based on [the program’s] timeline of November to November</p>

⁴⁰ PacifiCorp 2020 SVM Audit Corrective Action Plan.pdf, page 21

⁴¹ PacifiCorp 2020 SVM Audit Corrective Action Plan.pdf, page 9

⁴² PacifiCorp 2020 SVM Audit Corrective Action Plan.pdf, page 21

Corrective Action	Energy Safety's Analysis of Response
vegetation management operations are consistent with statements made in the WMP.	of the following year.” ⁴³ In its response, PacifiCorp provided supporting documentation showing it cleared 628 poles from November 2019 to December 2019. ⁴⁴ However, this supporting documentation does not support target completion during the 2020 WMP compliance period (i.e., calendar year 2020). Energy Safety finds this response did not sufficiently address the Corrective Action.

4. Conclusion

After reviewing PacifiCorp's response to the Corrective Actions, Energy Safety finds that PacifiCorp sufficiently addressed 7 of the 11 Corrective Actions. Three of the remaining insufficient Corrective Action Responses were related to PacifiCorp's interpretation of WMP targets as "estimates." PacifiCorp's responses demonstrate a fundamental misunderstanding of the Wildfire Mitigation Plan (WMP) process and its purpose. The WMP is the electrical corporation's proposal for how it will satisfy its obligation to "construct, maintain, and operate its electrical lines and equipment in a manner that will minimize the risk of catastrophic wildfire posed by those electrical lines and equipment."⁴⁵ An initiative is a commitment pertaining to a wildfire risk mitigation activity in an electrical corporation's WMP used to measure performance and compliance.⁴⁶ An initiative target, therefore, is not a best guess at what a utility hopes to achieve during the year based on an estimate.

Furthermore, pursuant to Public Utilities Code, section 8386.3(c)(5), after approval of a WMP, Energy Safety must oversee compliance with whether an electrical corporation failed to comply with the "vegetation management **requirements**" (emphasis added) in its WMP. Clearly, as outlined in statute, the commitments made in PacifiCorp's approved WMP, related to its vegetation management efforts, are to be treated as requirements and not "estimates," as PacifiCorp asserts. Watering down its vegetation management commitments in the approved 2020 WMP by referring to its targets as "estimates," does not provide PacifiCorp a reprieve from assessment of its ability to implement and meet these requirements in the context of this SVM audit. Accordingly, Energy Safety finds PacifiCorp's interpretation and assertion of WMP

⁴³ PacifiCorp 2020 SVM Audit Corrective Action Plan.pdf, page 9

⁴⁴ 5 - Statistics_History_Report_LRA (Nov2019-Nov2020).xlsx, sum of cells T2 through T6

⁴⁵ Pub. Util. Code, § 8386

⁴⁶ See Wildfire Safety Division Wildfire Mitigation Plan Compliance Process - November 2020, page 3, fn. 1.

targets being “estimates,” as insufficient. Inspections to identify vegetation risk around transmission lines, the vegetation management to remediate identified risk around electric lines, and clearing of vegetative fuels around poles with spark-emitting equipment to reduce the risk of a spark causing a fire are core vegetation management activities a utility must undertake to reduce the risk of a utility caused catastrophic wildfire.

The fourth remaining insufficient Corrective Action Response was related to PacifiCorp’s lack of detail regarding the nature and source of its resource limitations or contracting issues nor its efforts to mitigate such constraints, resulting in missing its commitment of completing all correction work annually. Energy Safety expects PacifiCorp to improve on its ability to accurately plan, resource, and execute these activities in the future.

In the SVM Audit, Energy Safety found PacifiCorp compliant in 8 of the 19 vegetation management initiatives audited.⁴⁷ Of the 11 Corrective Actions, Energy Safety found PacifiCorp sufficiently responded to 7. Given a total of 15 out of 19 initiatives that have been found to be compliant and/or sufficiently resolved, Energy Safety finds that PacifiCorp substantially complied with the substantial portion of the vegetation management requirements in its 2020 WMP.⁴⁸ However, Energy Safety expects PacifiCorp to continue to improve in the insufficient areas.

⁴⁷ PacifiCorp’s vegetation management section of its 2020 WMP contained 21 initiatives. However, only 19 of the 21 initiatives were applicable to the SVM audit.

⁴⁸ Pub. Util. Code, § 8386.3(c)(5)(C).

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