

May 8, 2023

VIA OEIS E-FILING

Office of Energy Infrastructure Safety
 715 P Street, 20th Floor
 Sacramento, CA 95814
efiling@energysafety.ca.gov

RE: PacifiCorp 2023 Wildfire Mitigation Plan

Dear Director Jacobs:

PacifiCorp d/b/a Pacific Power submits its 2023 Wildfire Mitigation Plan in accordance with the Office of Energy Infrastructure Safety’s 2023-2025 Wildfire Mitigation Plan (WMP) Update Guidelines and 2023-2-25 Wildfire Mitigation Plan Process and Evaluation Guidelines, issued on December 6, 2022.

The table below provides a list of changes made to the Company’s March 6, 2023 Pre-submission provided. The final WMP and the following changes are responsive to Energy Safety’s March 27, 2023 Determination of Completeness for PacifiCorp’s 2023-2025 Wildfire Mitigation Plan Pre-Submission.

Section of PacifiCorp’s WMP	Information updated
Utility Initiative Tracking IDs	Utility Initiative Tracking IDs updated throughout the document.
Appendices	Appendix D “Areas for Continued Improvement” and Appendix E “Referenced Regulations, Codes, and Standards.” updated.
“TBD,” “N/A,” and Blank Cells in Tables	Where applicable, PacifiCorp updated “TBD”, blank cells and “N/A”.
3. Statutory Requirements Checklist	PacifiCorp applied hyperlinks in the reference column of Table 3-1.
4.3 Proposed Expenditures	PacifiCorp included its planned WMP expenditures for the 2023- 2025 cycle and added the expenditures information in graph form.
5.3.1 Fire Ecology	PacifiCorp updated the description of Fire Ecology.
5.3.2 Catastrophic Wildfire History	PacifiCorp updated the narrative in the Catastrophic Wildfire History section.

Section of PacifiCorp's WMP	Information updated
5.4.2.2 Social Vulnerability and Exposure to Electrical Corporation Wildfire Risk	PacifiCorp updated this section to include the map and narrative.
5.4.5 Environmental Compliance and Permitting	PacifiCorp must provide a summary of how it ensures its compliance with applicable environmental laws, regulations, and permitting related to the implementation of its WMP.
6.2.2.1 Likelihood	PacifiCorp updated this section to make the timeline and scope for this development clearer.
6.2.2.2 Consequence	PacifiCorp updated this section to make the timeline and scope of this development clearer.
6.2.2.3 Risk	PacifiCorp updated this section to make the timeline and scope of this development clearer.
6.4.2 Top Risk-Contributing Circuits/Segments/Spans	PacifiCorp updated this section to make the timeline and scope of this development clearer.
6.6.1 Independent Review	PacifiCorp updated this section as applicable.
6.6.2 Model Controls, Design, and Review	PacifiCorp updated this section as applicable.
7.1.4.2 Mitigation Initiative Prioritization	PacifiCorp updated this section with additional information regarding prioritization.
7.2.1 Overview of Mitigation Initiatives and Activities	PacifiCorp updated this section to make its statement about interim initiatives clearer.
7.2.2.1 Projected Overall Risk Reduction	PacifiCorp updated this section to make the timeline and scope of this development clearer.
7.2.2.2 Risk Impact of Mitigation Initiatives	PacifiCorp updated this section to make the timeline and scope of this development clearer.
7.2.2.3 Projected Risk Reduction on Highest-Risk Circuits Over the Three-Year WMP Cycle	PacifiCorp updated this section to make the timeline and scope of this development clearer.
7.2.3 Interim Mitigation Initiatives	PacifiCorp updated this section to make its statement about interim initiatives clearer.
8.1.2.2 Undergrounding of electrical lines and/or equipment	Reference to the Risk Assessment section included in the WMP.
8.1.2.9 Line removal (in the HFTD)	Reference to the Line Rebuild section included in the WMP.

Section of PacifiCorp's WMP	Information updated
8.1.2.12 Other technology and systems not listed above	Although PacifiCorp's Expulsion Fuse Replacement project is not a maintenance activity, PacifiCorp moved the information about the project to Section 8.1.4 "Equipment Maintenance and Repair" as requested by OEIS. Targets will be tracked in the Grid Hardening target tables as Expulsion Fuses Replacement project has yearly targets and is not a cyclic activity.
8.1.4 Equipment Maintenance and Repair	"PacifiCorp Policy 001 added to Appendix E.
8.1.6 Quality Assurance and Quality Control (QA/QC)	PacifiCorp included the Asset Inspection QA/QC information.
8.1.7 Open Work Orders	PacifiCorp updated the section as applicable.
8.1.6 Quality Assurance and Quality Control	PacifiCorp included information on sample size.
8.1.8.2 Grid Response Procedures and Notifications	Information on fire suppression procedures added to this section.
8.3.1.3 Performance Metrics Identified by the Electrical Corporation	Performance metrics updated in table.
8.3.5.5 Enterprise System for Weather Forecasting	Discussion on how PacifiCorp stores its weather data included.
8.3.6.1 Existing Calculation Approach and Use	Reference to section where PacifiCorp discusses how it uses its fire potential product in its operations included in the document.
8.4.1.3 Performance Metrics Identified by the Electrical Corporation	Performance metric added to table.
8.4.2.1 Overview of Wildfire and PSPS Emergency Preparedness	Section updated to make scope of the activities clearer.
8.4.2.3 Drills, Simulations, and Tabletop Exercises	"Internal Drill, Simulation, and Tabletop Exercise Program" Table added to the document
8.4.3.3 Mutual Aid Agreements	Narrative in this section updated as needed.
8.4.4.1 Protocols for Emergency Communication	Narrative in this section updated as needed.
8.4.4.3 Current Gaps and Limitations	Content in the table updated to include the timeline

Section of PacifiCorp's WMP	Information updated
8.4.5.1 Overview of Service Restoration Plan	Narrative included in this section.
8.4.5.2 Planning and Allocation of Resources	Narrative included in this section.
8.4.6 Customer Support in Wildfire and PSPS Emergencies	Narrative in this section updated as applicable.
8.4.6 Customer Support in Wildfire and PSPS Emergencies	Narrative in this section updated as applicable.
8.5.1.2 Targets	Targets added to the table 8-55.
8.5.1.3 Performance Metrics Identified by the Electrical Corporation	Narrative updated to include trends.
8.5.3 Engagement with Access and Functional Needs Populations	PacifiCorp included AFN percentage of its total customer base. Reference to section with demographics is included in the document.
8.5.3 Engagement with Access and Functional Needs Populations	Section updated to include challenges and needs of PacifiCorp's AFN customer base.
8.5.4 Collaboration on Local Wildfire Mitigation Planning	Information on Table 8-60 included.
8.5.5 Best Practice Sharing with Other Electrical Corporations	PacifiCorp updated the narrative as needed.
9.1.4 Targets	PacifiCorp included targets in the targets table.
9.1.5 Performance Metrics Identified by the Electrical Corporation	PacifiCorp included performance metrics in the targets table
9.1.6 Protocols on PSPS	PacifiCorp improved the narrative as applicable.
10 Lessons Learned	PacifiCorp included this section in the document.
11 Corrective Action Program	PacifiCorp included this section in the document.

If you have any questions regarding this request, please contact Pooja Kishore, Regulatory Affairs Manager at (503) 813-7314.

Sincerely,



Matthew McVee
Vice President, Regulatory Policy and Operations

cc: Frank.Bigelow@fire.ca.gov
Jeff.Fuentes@fire.ca.gov
CALFIREUtilityFireMitigationUnit@fire.ca.gov
Caroline.ThomasJacobs@energysafety.ca.gov
Brian.Bishop@energysafety.ca.gov
Lucy.Morgans@energysafety.ca.gov
Melissa.Semcer@energysafety.ca.gov
Koko.Tomassian@energysafety.ca.gov
Stephen.Lai@energysafety.ca.gov
Edward.Chavez@energysafety.ca.gov
MaryBeth.Farley@energysafety.ca.gov
Leslie.Palmer@cpuc.ca.gov
Carolyn.Chen@cpuc.ca.gov
Charles.Madison@cpuc.ca.gov
CalAdvocates.WildfireDiscovery@cpuc.ca.gov