



June 29, 2023

Via Electronic Filing

Caroline Thomas Jacobs, Director
Office of Energy Infrastructure Safety
California Natural Resources Agency
Sacramento, CA 95814
efiling@energysafety.ca.gov

Subject: Comments of the Public Advocates Office on PacifiCorp's 2023 to 2025 Wildfire Mitigation Plan

Docket: 2023-2025-WMPs

Dear Director Thomas Jacobs,

The Public Advocates Office at the California Public Utilities Commission (Cal Advocates) respectfully submits the following comments on the 2023-2025 Wildfire Mitigation Plan of PacifiCorp d/b/a Pacific Power (PacifiCorp). Please contact Nathaniel Skinner (Nathaniel.Skinner@cpuc.ca.gov) or Henry Burton (Henry.Burton@cpuc.ca.gov) with any questions relating to these comments.

We respectfully urge the Office of Energy Infrastructure Safety to adopt the recommendations discussed herein.

Sincerely,

/s/ Joseph Lam
Joseph Lam
Attorney

Public Advocates Office
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, California 94102
Telephone: (213) 576-7067
E-mail: Joseph.Lam@cpuc.ca.gov

TABLE OF CONTENTS

	<u>Page</u>
I. INTRODUCTION	1
II. TABLE OF RECOMMENDATIONS	2
III. PACIFICORP	5
A. Grid Design and System Hardening.....	5
1. Energy Safety should require PacifiCorp to submit a detailed plan demonstrating it can meet its system hardening targets.....	5
B. Asset Management and Inspections	7
1. Energy Safety should direct PacifiCorp to expedite the resolution of Level 1 asset work orders.	7
2. Energy Safety should direct PacifiCorp to file a revised WMP that addresses overdue asset work orders and includes a plan to manage future asset work orders.	14
3. Energy Safety should direct PacifiCorp to update its efforts to migrate its asset databases into modern formats in its next WMP.	15
C. Vegetation Management and Inspections.....	16
1. Energy Safety should direct PacifiCorp to improve its QA/QC methods to ensure vegetation management work complies with internal standards and procedures.	16
D. Public Safety Power Shutoffs.....	19
1. Energy Safety should direct PacifiCorp to create a plan in case of de-energizations by sources outside of California.	19
E. Wildfire Mitigation Strategy	20
1. Energy Safety should direct PacifiCorp to establish adequate staffing levels to improve data quality during the WMP evaluation process.....	20
IV. GENERAL RECOMMENDATIONS ON TECHNICAL ISSUES	25
V. CONCLUSION.....	25

I. INTRODUCTION

Pursuant to the Office of Energy Infrastructure Safety’s (Energy Safety) *Final 2023-2025 Wildfire Mitigation Plan Process and Evaluation Guidelines* (2023 WMP Process Guidelines) and the *2023 Wildfire Mitigation Plan Schedule*¹ as modified,² the Public Advocates Office at the California Public Utilities Commission (Cal Advocates) submits these comments on PacifiCorp d/b/a Pacific Power’s (PacifiCorp) 2023 to 2025 Wildfire Mitigation Plan (WMP) submitted on May 8, 2023.

The 2023-2025 Wildfire Mitigation Plan Technical Guidelines (2023 WMP Technical Guidelines) established templates and substantive requirements for WMP submissions, and the 2023 WMP Process Guidelines established a schedule and review process for WMP submissions in 2023. Bear Valley Electric Service (BVES), Liberty Utilities (CalPeco Electric) LLC (Liberty) submitted their 2023-2025 WMPs on May 8, 2023.³

The 2023 WMP Process Guidelines and the revised 2023 WMP schedule permit interested persons to file opening comments on the small IOUs’ 2023 WMPs by June 29, 2023, and reply comments by July 10, 2023.

¹ Office of Energy Infrastructure Safety’s (Energy Safety), *Final 2023-2025 Wildfire Mitigation Plan Process and Evaluation Guidelines*, December 6, 2022.

Energy Safety, *2023 Wildfire Mitigation Plan Schedule*, December 7, 2022.

² On March 21, 2023, Energy Safety modified the submission and comment schedule for the small and multi-jurisdictional investor-owned utilities. See *Revised 2023 Wildfire Mitigation Plan Schedule for the Small Multi-Jurisdictional Utilities and Independent Transmission Operators*, Energy Safety, March 21, 2023, in docket 2023-2025-WMPs.

³ Many of the Public Utilities Code requirements relating to wildfires apply to “electrical corporations.” See e.g., Public Utilities Code Section 8386. These comments use the more common term “utilities” and the phrase “electrical corporations” interchangeably to refer to the entities that must comply with the wildfire safety provisions of the Public Utilities Code.

II. TABLE OF RECOMMENDATIONS

Item	Utility	Recommendation	Timeframe	Section of these Comments
1	PacifiCorp	Energy Safety should require PacifiCorp to submit a detailed plan demonstrating it can meet its system hardening targets.	Revised 2023 WMP	III.A.1
2	PacifiCorp	Energy Safety should require PacifiCorp to develop a thorough and feasible strategy to attain grid hardening objectives.	Revised 2023 WMP	III.A.1
3	PacifiCorp	Energy Safety should require PacifiCorp to provide a detailed grid hardening project list that clearly indicates the start and stop dates for each phase to increase transparency and facilitate effective monitoring of PacifiCorp's progress.	Revised 2023 WMP	III.A.1
4	PacifiCorp	Energy Safety should direct PacifiCorp to expedite the resolution of Level 1 asset work orders.	Revised 2023 WMP	III.B.1
5	PacifiCorp	Energy Safety should direct PacifiCorp to prioritize resource allocation for the resolution of Level 1 asset work orders.	Revised 2023 WMP	III.B.1
6	PacifiCorp	Energy Safety should direct PacifiCorp to revise its company procedures for classification of asset work orders to conform with General Order 95.	Revised 2023 WMP	III.B.1
7	PacifiCorp	Energy Safety should direct PacifiCorp to provide clear criteria and a decision tree for determining whether an asset condition is a Level 1 or Level 2 asset work order.	Revised 2023 WMP	III.B.1
8	PacifiCorp	Energy Safety should direct PacifiCorp to describe its protocols for when and how to use interim measures to temporarily correct an asset work order.	Revised 2023 WMP	III.B.1

Item	Utility	Recommendation	Timeframe	Section of these Comments
9	PacifiCorp	Energy Safety should direct PacifiCorp to perform an in-depth analysis of the factors contributing to the delays in resolving Level 1 asset work orders in 2020-2022.	Revised 2023 WMP	III.B.1
10	PacifiCorp	Energy Safety should require PacifiCorp to file a revised WMP that includes a plan to address past due asset work orders. This plan should include quarterly or annual targets for reducing the backlog.	Revised 2023 WMP	III.B.2
11	PacifiCorp	Energy Safety should require PacifiCorp’s revised WMP to include details on how PacifiCorp intends to develop tools to project future trends and past due asset work orders, with specific milestones that it will meet, and proposed target dates for completion of the new tools.	Revised 2023 WMP	III.B.2
12	PacifiCorp	Energy Safety should direct PacifiCorp to update its efforts to migrate its asset databases into modern formats in its next WMP.	2024 WMP Update	III.B.3
13	PacifiCorp	Energy Safety should require PacifiCorp to provide specific updates on the progress of its data migration to Maximo. PacifiCorp should describe its progress toward fully transitioning to the new database and report the types of data migrated, the current uses of the new database, and the expected timeline for completing the project.	2024 and 2025 WMP Updates	III.B.3
14	PacifiCorp	Energy Safety should direct PacifiCorp to improve its QA/QC methods to ensure vegetation management work complies with internal standards and procedures.	2024 WMP Update	III.C.1

Item	Utility	Recommendation	Timeframe	Section of these Comments
15	PacifiCorp	Energy Safety should direct PacifiCorp to prioritize the creation of a centralized database dedicated to recording and tracking ad hoc crew visits.	2024 WMP Update	III.C.1
16	PacifiCorp	Energy Safety should direct PacifiCorp to engage independent auditors to provide an unbiased assessment of its post-work audit process.	2024 WMP Update	III.C.1
17	PacifiCorp	Energy Safety should direct PacifiCorp to provide quarterly reports on its vegetation management QA/QC performance.	2023 – 2025 Quarterly Data Reports	III.C.1
18	PacifiCorp	Energy Safety should direct PacifiCorp to create a plan in case of de-energizations by sources outside of California.	2024 WMP Update	III.D.1
19	PacifiCorp	Energy Safety should direct PacifiCorp to examine the effects that “Loss of Transmission Line” events and PSPS events by PacifiCorp’s Oregon territory might have on its California circuits.	2024 WMP Update	III.D.1
20	PacifiCorp	Energy Safety should direct PacifiCorp to develop a plan to mitigate the effects of such de-energizations on its California customers.	2024 WMP Update	III.D.1
21	PacifiCorp	Energy Safety should direct PacifiCorp to develop a staffing plan to adequately support the development, evaluation, and implementation of its WMPs.	Revised 2023 WMP	III.E.1
22	PacifiCorp	Energy Safety should direct PacifiCorp to populate all tables with the required information required by the 2023 WMP Technical Guidelines.	2024 WMP Update	III.E.1
23	PacifiCorp	Energy Safety should direct PacifiCorp to provide additional details regarding the procedures and processes that affirm the accuracy, thoroughness, and reliability of its WMP data.	2024 WMP Update	III.E.1

III. PacifiCorp

A. Grid Design and System Hardening

1. Energy Safety should require PacifiCorp to submit a detailed plan demonstrating it can meet its system hardening targets.

While PacifiCorp has made considerable efforts to implement grid hardening measures to reduce the risk of wildfires, an analysis of its performance from 2020 to 2022 reveals significant shortcomings in meeting grid hardening targets. These shortcomings raise concerns about the effectiveness of PacifiCorp’s wildfire risk reduction efforts.

In 2022, PacifiCorp forecast that it would reinforce or replace 2,158 poles.⁴ PacifiCorp only reinforced or replaced 1,101 poles (51 percent).⁵ Similarly, PacifiCorp forecast 112 miles of covered conductor installation in 2022⁶, but only completed 62 miles (55 percent).⁷ Table 1 compares PacifiCorp’s actual grid hardening work to its targets in 2020 through 2022.

Table 1 PacifiCorp’s Grid Hardening Performance, 2020 – 2022 ⁸						
	2020 Target ⁹	2020 Actual	2021 Target ¹⁰	2021 Actual	2022 Target ¹¹	2022 Actual ¹²
Covered Conductor	38 miles	1.4 miles	81.2 miles	20 miles	112 miles	62 miles
Pole Replacements	39 poles	29 poles	128 poles	87 poles	2,158 poles	1,101 poles

⁴ PacifiCorp Q4 2022 QDR, Table 1.

⁵ PacifiCorp Q4 2022 QDR, Table 1, dividing cells AB15 by T15.

⁶ PacifiCorp Q4 2022 QDR, Table 1.

⁷ PacifiCorp Q4 2022 QDR, Table 1, dividing cells AB18 by AB18.

⁸ Except where noted, figures are from PacifiCorp’s Q1 2022 Wildfire Mitigation Plan Quarterly Data Report - non-spatial data template, Table 12.

⁹ PacifiCorp’s 2020 WMP, Table 23.

¹⁰ PacifiCorp’s 2021 WMP Update Attachment 1, 2021 Performance Metrics, Table 12.

¹¹ PacifiCorp Q4 2022 QDR, Table 1.

¹² PacifiCorp Q4 2022 QDR, Table 1.

As Table 1 shows, over the past three years, PacifiCorp has repeatedly fallen short of its grid hardening goals for covered conductor and pole replacements. In some cases, actual results have been far below expectations, casting doubt on the company's ability to effectively mitigate wildfire risks.¹³ The consistent shortcomings in implementing system hardening measures by PacifiCorp have far-reaching implications, such as significantly elevating the risk of wildfires and increasing the likelihood of de-energization events for its customers.

PacifiCorp operates 814 overhead distribution circuit miles within California's High Fire Threat Districts (HFTDs).¹⁴ As part of its plans for 2023, PacifiCorp intends to replace 130 circuit miles with covered conductor, which constitutes nearly 16 percent of its distribution circuit miles in the HFTDs.¹⁵ The 2023 system hardening goal is an ambitious plan, and PacifiCorp's recent performance raises doubts about its achievability. As of May 8, 2023, PacifiCorp has reported installing only 19 miles of covered conductor,¹⁶ yet its plan was to have 63 miles installed by the conclusion of June 2023.¹⁷

Furthermore, Cal Advocates has identified PacifiCorp's practice of overpromising and underdelivering in previous WMP comments. In comments on PacifiCorp's 2022 WMP update, Cal Advocates stated that "PacifiCorp's actual output in 2020 and 2021 for its two biggest system hardening programs—covered conductor installation and pole replacements—has been far below PacifiCorp's projection."¹⁸

PacifiCorp attributes the delays experienced in 2022 to a range of factors, including permitting challenges, materials availability, and contractor resource constraints.¹⁹ Recognizing that these challenges are likely to persist and continue to impact the delivery of wildfire mitigation measures, PacifiCorp plans to "engage a construction management partner through a

¹³ 2022 was the first year that PacifiCorp was able to achieve at least 50 percent of its covered conductor installation goal.

¹⁴ PacifiCorp's 2023-2025 WMP, p. 35.

¹⁵ PacifiCorp's 2023-2025 WMP, p. 132.

¹⁶ PacifiCorp Q1 2023 QDR, Table 1.

¹⁷ PacifiCorp Q1 2023 QDR, Table 1.

¹⁸ Comments of the Public Advocate's Office on the 2022 Wildfire Mitigation Plan Updates on Small Utilities, p. 53.

¹⁹ PacifiCorp's response to DR CalAdvocates-PacifiCorp-2023WMP-09, question 1, June 6, 2023.

competitive bidding process initiated in 2022 and concluding in 2023.”²⁰ PacifiCorp expects that hiring a contracted partner in 2023 will provide support for the delivery of covered conductor projects and overall contribute to grid hardening efforts.²¹ While CalAdvocates doesn't contest the potential benefits, PacifiCorp has yet to show how a contractor, whom it hasn't employed as of May 2023, could influence PacifiCorp's activities within the same year.²²

Considering these findings, Energy Safety should direct PacifiCorp to submit a revised WMP that addresses the challenges faced by its grid hardening programs. In its revised 2023 WMP, PacifiCorp should:

- Develop a thorough and feasible strategy to attain grid hardening objectives. The strategy should delineate precise actions to tackle limitations in staffing, permitting, and resources, while incorporating contingency plans to mitigate potential setbacks.
- Provide a detailed grid hardening project list for 2023 through 2025 that clearly indicates the start and stop dates for each phase to increase transparency and facilitate effective monitoring of progress.

The failure to meet grid hardening targets for three consecutive years raises significant concerns about PacifiCorp's ability to effectively mitigate wildfire risks. The challenges faced by the company necessitate comprehensive planning, resource allocation, and contingency measures. By implementing the recommendations outlined above, Energy Safety can encourage PacifiCorp to prioritize grid hardening, thus mitigating the risk of wildfires and de-energization events.

B. Asset Management and Inspections

1. Energy Safety should direct PacifiCorp to expedite the resolution of Level 1 asset work orders.

PacifiCorp's internal policies and procedures categorize asset inspection issues by priority, with Level 1 requiring urgent resolution.^{23, 24} However, the company is frequently

²⁰ PacifiCorp's 2023-2025 WMP, p. 140.

²¹ PacifiCorp's 2023-2025 WMP, p. 140.

²² PacifiCorp's 2022 WMP stated that it would run “a competitive bidding process in 2022” and the contractor would begin in “late 2022 or early 2023” (PacifiCorp's 2022 WMP, pp. 282-283). PacifiCorp's 2023 WMP states that the competitive bidding process will conclude in 2023 and the contractor will begin work in 2023 (PacifiCorp's 2023 WMP, pp. 139-140).

²³ PacifiCorp's Asset Management Policy 192.

²⁴ PacifiCorp's Procedure 069.

unable to meet its own 30-day deadline, which raises questions about its capacity to promptly handle issues threatening safety or reliability. This problem indicates a need for continuous improvement.

a) PacifiCorp does not resolve Level 1 asset work orders in a timely manner.

All issues identified during asset inspections are categorized into different priority levels. Level 1 maintenance issues are the most serious and urgent. However, after an issue is initially classified as a Level 1 condition, PacifiCorp conducts an assessment to determine its urgency.²⁵ Under PacifiCorp's procedures, if the issue is considered an *imminent* threat to safety or reliability, it must be addressed immediately, but if the issue is deemed a *non-imminent* threat, it should be resolved within 30 days from the initial assessment.²⁶

A review of PacifiCorp's Level 1 asset work orders from 2020 to 2022 shows significant failures by PacifiCorp. Figure 1 shows Level 1 asset work orders, grouped by year and HFTD tier. The bars show the average, median, and maximum number of days it took PacifiCorp to resolve asset work orders in each group. The line shows the percentage of asset work orders in each group that were resolved within 30 days.

²⁵ PacifiCorp's response to CalAdvocates-PacifiCorp-2023WMP-14, question 1, June 12, 2023.

²⁶ PacifiCorp's response to CalAdvocates-PacifiCorp-2023WMP-13, question 5, June 12, 2023.

**Figure 1
Resolution Time for 2020 – 2022 Level 1 Asset Orders²⁷**

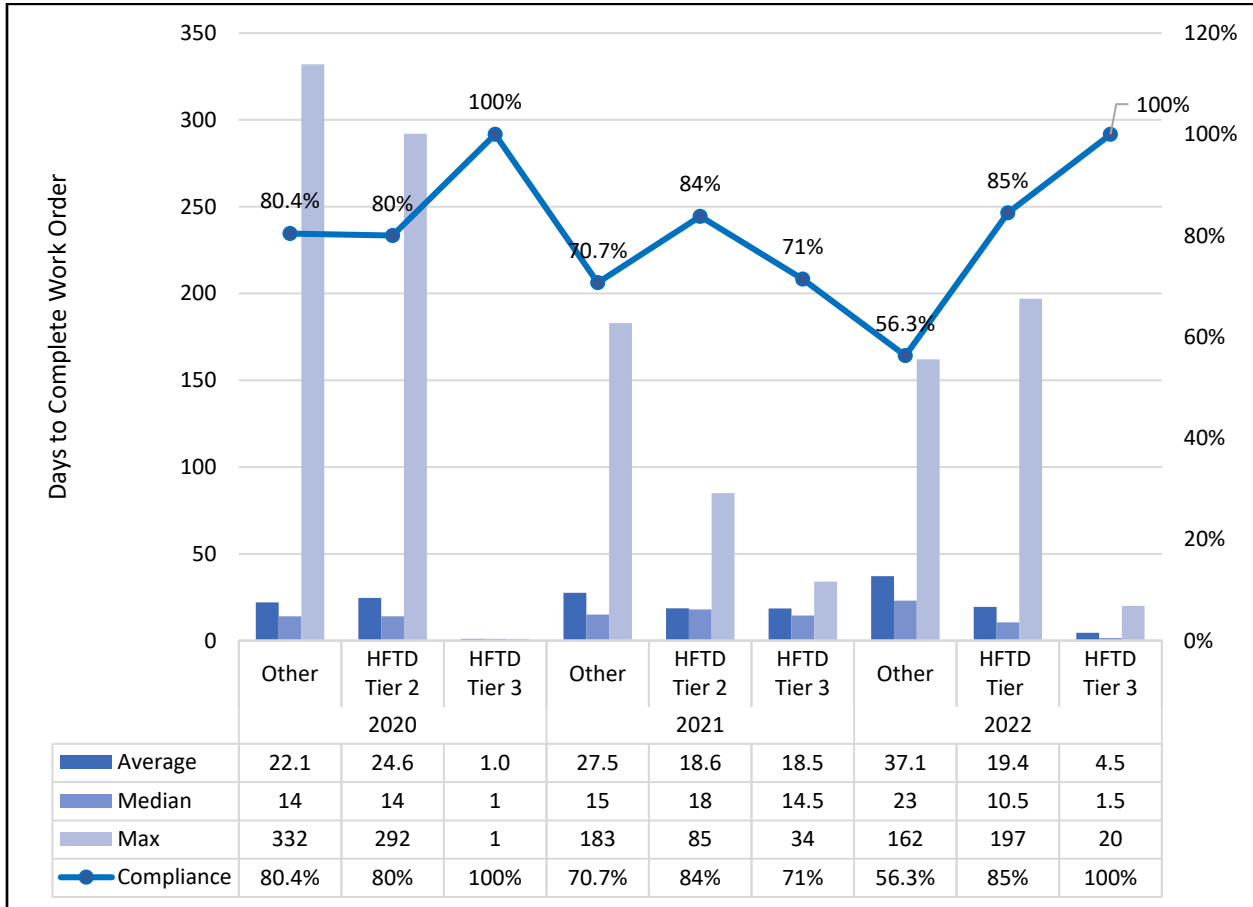


Figure 1 illustrates several important problems.

1. PacifiCorp’s adherence to its internal procedure during this period has been quite limited. There were only two instances of full compliance with PacifiCorp’s internal 30-day deadline. Compliance rates range from 56% to 100%.²⁸
2. The completion time for Level 1 asset work orders has reached as much as 332 days.²⁹
3. PacifiCorp took an average of 37.1 days to address Level 1 asset work orders in Non-HFTD areas in 2022.

²⁷ Data for Figure 1 is from the Excel file “Attach CalAdvocates 14.1.xlsx” attached to the response to CalAdvocates-PacifiCorp-2023WMP-14, question 1, June 12, 2023.

²⁸ PacifiCorp completed 100% of Tier 3 Level 1 Asset Orders within 30 days in 2020 and 2022.

²⁹ 2020, Non-Tier (HFTD) Area.

In the first quarter of 2023, PacifiCorp completed all Tier 3 Level 1 asset orders within the prescribed 30-day timeframe. This performance demonstrates that the company has the capability to meet its timeframes. However, in the same quarter, PacifiCorp again exceeded its own 30-day requirement for addressing Level 1 asset orders in Tier 2 and Non-HFTD areas.³⁰

b) PacifiCorp has not identified any asset work orders as “imminent” threats, despite evidence of highly dangerous problems.

Between 2020 and 2022, PacifiCorp’s created 1,075 Level 1 asset work orders in California. The company classified all of them as “non-imminent” issues.³¹ In each instance, PacifiCorp set a roughly 30-day timeframe for repairs.³² According to the company's policy and procedure, the remediation deadlines imply that *all* Level 1 asset work orders were categorized as “non-imminent.”³³

Examples of these “non-imminent” issues are provided in Table 2. They include asset work orders that concern conductor damage and fraying, trees contacting primary and open secondary conductor, and poles with decay or damage requiring replacement. The average time from inspection to completion for these issues ranged from 17 to 42.4 days. In some cases, the time to complete the asset work order was as long as 212 days.

³⁰ PacifiCorp Q1 2023 QDR, Table 2.

³¹ This classification was based on an evaluation of the initially allotted time for completing each work order. If a work order was scheduled for completion within 28 to 31 days, it was labeled as “non-imminent.”

³² Correction timeframes range from 28 to 31 days. PacifiCorp’s response to data request CalAdvocates-PacifiCorp-2023WMP-14, question 1, June 12, 2023. See the Excel file “Attach CalAdvocates 14.1.xlsx”.

³³ PacifiCorp’s response to data request CalAdvocates-PacifiCorp-2023WMP-14, question 1, June 12, 2023.

[PacifiCorp] designates all Level 1 priority work orders as A conditions. The data in the attachment includes all conditions designated as an A condition in 2020 through 2022 per Company Procedure 069. The Company’s internal Policy 192 requires A conditions that are imminent dangers to be corrected immediately. For any A conditions that are not imminent dangers, the policy allows for up to 30 days for corrective action.

Table 2 Examples of 2020-2022 Non-Imminent Level 1 Asset Work Orders ³⁴		
Damage Code	Average Time to Complete	Longest Time to Complete
Conductor Damaged/Frayed	21.3 days	74 days
Distribution – Tree Contacting Primary	17.1 days	25 days
Tree Contacting Open Secondary	17 days	17 days
Pole Decay or Damage Reject/Replace	42.4 days	212 days

The problems listed in Table 2 constitute serious risks to public safety that should have been addressed immediately. These problems raises questions about PacifiCorp’s prudence and the appropriateness of its classification and treatment of Level 1 asset orders. In fact, the classification of any Level 1 issue as non-imminent is not only unusual but also runs counter to the requirements in General Order (GO) 95.³⁵ This deviation from GO 95 requirements, coupled with the excessive time taken to resolve these issues, indicates imprudent handling of Level 1 asset work orders by PacifiCorp. The elongated time frames for addressing these issues can have dire consequences for public safety, wildfire risk, and reliability.

c) PacifiCorp’s approach to Level 1 asset work orders does not follow General Order 95.

It is concerning that no 2020 – 2022 Level 1 asset orders were classified as imminent threats, despite the fact that according to GO 95, Level 1 issues by definition pose an “immediate safety and/or reliability risk with a high probability for significant impact on safety or reliability.”³⁶ PacifiCorp appears to have re-defined Level 1 issues in a way that contradicts GO 95 and PacifiCorp’s internal policy: PacifiCorp never finds these problems to pose an imminent threat, but the general order states that such issues pose an “immediate” risk with serious impact.

³⁴ Data for Table 2 is from the Excel file “Attach CalAdvocates 14.1.xlsx” attached to the response to CalAdvocates-PacifiCorp-2023WMP-14, question 1, June 12, 2023.

³⁵ California Public Utilities Commission General Order 95, Section 1, Rule 18.

³⁶ California Public Utilities Commission General Order 95, Section 1, Rule 18.

GO 95 requires electric companies to “take action immediately, either by fully repairing the condition, or by temporarily repairing and reclassifying the condition to a lower priority.”³⁷ PacifiCorp’s Asset Management Policy 192 states that “Priority A Conditions which are Imminent Threats require correction immediately.”³⁸

Out of 1,075 Level 1 asset work orders issued in 2020, 2021, and 2022 none were assigned a deadline shorter than approximately 30 days.³⁹ Moreover, there are no records indicating any of these asset work orders were reassigned a new priority level or that the initial asset work order was modified in any way.⁴⁰

PacifiCorp states that it “may take interim measures” to make a situation safe (as GO 95 allows).⁴¹ However, PacifiCorp does not appear to reclassify asset work orders to reflect the revised urgency if there are interim actions. There are no indications in PacifiCorp’s data response that any non-imminent Level 1 asset work orders were reclassified to a lower priority level after interim measures were taken.⁴²

d) Remedy: Energy Safety should require PacifiCorp to improve its asset maintenance practices.

To ensure public safety and asset reliability, Energy Safety should direct PacifiCorp to improve its management of critical asset vulnerabilities. Specifically, PacifiCorp should submit a revised 2023 WMP that includes the following actions:

³⁷ California Public Utilities Commission General Order 95, Section 1, Rule 18.

³⁸ PacifiCorp’s Asset Management Policy 192, p. 4, fn 3.

³⁹ PacifiCorp Excel file “Attach CalAdvocates 14.1.xlsx”, Tab “CA_A_CONDITIONS”, difference between column I and H.

⁴⁰ PacifiCorp Excel file “Attach CalAdvocates 14.1.xlsx”, Tab “CA_A_CONDITIONS”, column L “Date(s) the work order was reinspected or modified (if applicable)”, all cell values are marked as non-applicable “NA.”

⁴¹ PacifiCorp’s response to CalAdvocates-PacifiCorp-2023WMP-16, question 2, June 20, 2023: “depending on the severity and if possible, the Company may take interim measures or actions to ensure the condition is made safe until correction action can be completed.”

⁴² PacifiCorp Excel file “Attach CalAdvocates 14.1.xlsx”, Tab “CA_A_CONDITIONS”, column L “Date(s) the work order was reinspected or modified (if applicable)”, all cell values are marked as non-applicable “NA.”

- Provide a comprehensive plan that ensures the timely resolution of Level 1 asset orders.
- Prioritize resource allocation for the resolution of Level 1 asset orders. Doing so should involve reassessing and streamlining its asset maintenance scheduling and planning processes to ensure that non-imminent threats are dealt with urgently.
- Revise its company procedures for classification of asset work orders to conform with General Order 95. PacifiCorp should eliminate the paradoxical category of “non-imminent” Level 1 asset work orders. Asset work orders should either be classified as Level 1 (“immediate risk of high potential impact to safety or reliability”) or Level 2 (other risks with at least moderate impact).⁴³
- Provide clear criteria and a decision tree for determining whether an asset condition is a Level 1 or Level 2 work order. PacifiCorp should list and describe examples of conditions that are appropriate for each category.
- Describe PacifiCorp’s protocols for when and how to use interim measures to temporarily correct an asset work order.
- Perform an in-depth analysis of the factors contributing to the delays in resolving Level 1 asset orders in 2020-2022. PacifiCorp should be required to outline specific actions and strategies that it will employ to improve its performance in addressing these issues promptly.

Going forward, PacifiCorp should be required to periodically review and update its internal procedures for classifying asset orders. Doing so is needed to ensure alignment with the General Order and to ensure PacifiCorp is meeting safety and reliability standards. Energy Safety should direct PacifiCorp to submit the results of this review in its 2024 WMP submission.

In conclusion, the timely resolution of Level 1 asset work orders is not just a procedural requirement but a critical component in ensuring public safety, mitigating the risk of wildfire, and increasing the reliability of utility assets. The seemingly contradictory categorization and prolonged resolution times observed in PacifiCorp's handling of Level 1 asset orders are both imprudent and potentially hazardous. Therefore, PacifiCorp should be required by Energy Safety to address these issues with the urgency, thoroughness, and accountability they warrant.

⁴³ CPUC General Order 95, Section 1, Rule 18B.

2. Energy Safety should direct PacifiCorp to file a revised WMP that addresses overdue asset work orders and includes a plan to manage future asset work orders.

PacifiCorp has recently experienced a rapid increase in the number of overdue asset work orders in HFTDs. These uncorrected maintenance problems can create wildfire and public safety hazards.

PacifiCorp describes the current state of its open and overdue asset work orders in Table 8-8 of its WMP and an accompanying chart.⁴⁴ These charts indicate that PacifiCorp experienced a substantial increase in number of overdue asset work orders from quarter 4 of 2022 to quarter 1 of 2023.⁴⁵ Specifically, past due asset work orders doubled overall,⁴⁶ with past due asset work orders in Tier 2 HFTDs increasing to five times their prior levels.⁴⁷ Past due asset work orders in Tier 3 HFTDs increased from zero in Q4 2022 to eight in Q1 2023. While the overall numbers are not large, Cal Advocates is concerned by this spike in overdue maintenance work on PacifiCorp's system.

PacifiCorp must quickly move to address the backlog of open asset work orders to ensure public safety and minimize the risk of equipment failure. Equipment failures, especially in high fire risk areas, have the potential to spark catastrophic wildfires that present extreme safety risk to Californians. PacifiCorp acknowledges that it has overdue asset work orders but does not present any plan in its WMP to address the overdue asset work orders.⁴⁸

PacifiCorp also states that it does not have the capability to project trends or set future targets for past due asset work orders.⁴⁹ In discovery, PacifiCorp states that this lack of capability is because it does not "have the tools available" to project trends or future targets regarding past due asset work orders.⁵⁰ In comparison, BVES uses its new asset enterprise

⁴⁴ PacifiCorp's 2023-2025 WMP, p. 165.

⁴⁵ Overdue work orders are defined as any condition that is not completed on or before the compliance date, as required by CPUC General Order 95.

⁴⁶ In Q4 2022 PacifiCorp had a total of 52 past due work orders. In Q1 2023, the number of past due work orders increased to 115.

⁴⁷ In HFTD Tier 2, PacifiCorp had 3 overdue asset work orders in Q4 of 2022 and 15 in Q1 of 2023.

⁴⁸ PacifiCorp's 2023-2025 WMP, pp. 163-165.

⁴⁹ PacifiCorp's 2023-2025 WMP, p. 164.

⁵⁰ PacifiCorp's response to CalAdvocates-PacifiCorp-2023WMP-13, Question 04.

system to conduct work order trend analysis.^{51,52} Among the large IOUs, a typical practice is to project open and overdue work order trends based on prior years and then make a plan to address those work orders.⁵³ However, PacifiCorp does elaborate that it is planning to develop trending and future target tools for past due asset work orders but does not specify when this work will be complete.⁵⁴

To rectify these issues, Energy Safety should require PacifiCorp to file a revised WMP that includes a plan to address past due asset work orders. This plan should include quarterly or annual targets for reducing the backlog. For example, reasonable and realistic goals could be that PacifiCorp will reduce overdue asset work orders in HFTD areas by 75 percent by Q4 of 2023, and completely eliminate overdue asset work orders across all HFTD tiers before the start of the 2024 fire season.

Cal Advocates also recommends that PacifiCorp's revised WMP include details on how PacifiCorp intends to develop tools to project future trends and past due asset work orders, with specific milestones that it will meet, and proposed target dates for completion of the new tools.

3. Energy Safety should direct PacifiCorp to update its efforts to migrate its asset databases into modern formats in its next WMP.

In its WMP, PacifiCorp is required to describe its asset management and inspection enterprise systems. These systems are important to protecting public safety because they store and organize data on PacifiCorp's asset inventory and conditions, internal documentation practices, and integration with systems in other lines of the company.⁵⁵

PacifiCorp states that it does not have an asset management and inspection enterprise system. PacifiCorp instead chooses to rely on "legacy databases" and "internal planning tools" to determine asset inventory and to manage inspection and maintenance programs. PacifiCorp adds that it does not currently have plans to develop or migrate towards a single enterprise

⁵¹ BVES's 2023-2025 WMP, pp.160-161.

⁵² Liberty's 2023-2025 WMP, pp.183-184. For its part, Liberty does not describe any capability to project open work orders but notes that past due work orders have grown steadily since 2020.

⁵³ See, for example, PG&E's 2023-2025 WMP, pp.453-455 and SDG&E's 2023-2025 WMP, p.148.

⁵⁴ PacifiCorp's response to CalAdvocates-PacifiCorp-2023WMP-13, Question 04.

⁵⁵ PacifiCorp's 2023-2025 WMP, p. 159.

system.⁵⁶ However, in response to discovery, PacifiCorp states that it is currently transitioning all asset management and inspection data to Maximo with the goal of developing a single system.^{57, 58}

PacifiCorp’s variety of “legacy databases” and “internal planning tools” create an inefficient, difficult-to-audit, and potentially error-prone method of managing asset data. PacifiCorp currently stores asset inspection and maintenance data as well as Quality Assurance and Quality Control (QA/QC) data in at least four different database types.⁵⁹ Given that PacifiCorp is beginning to transition records to Maximo with the goal of fully adopting this system by 2025,⁶⁰ Energy Safety should require PacifiCorp to provide specific updates on the progress of its data migration to Maximo in its next WMP. In its 2024 and 2025 WMP submissions, PacifiCorp should be required to describe its progress toward fully transitioning to the new database. PacifiCorp should report the types of data migrated (e.g., substation, distribution, transmission asset data, QA/QC results, inspections performed), the current uses of the new database, the expected timeline for completing the project, and the status of validating data to ensure any errors introduced during the migration have been fixed.

C. Vegetation Management and Inspections

1. Energy Safety should direct PacifiCorp to improve its QA/QC methods to ensure vegetation management work complies with internal standards and procedures.

In 2022, PacifiCorp’s quality control audits revealed many shortcomings in its vegetation management work. The audits identified a need for remediation on about three-quarters of the lines audited, leading to thousands of corrective actions. These shortcomings are problematic because they imply that PacifiCorp’s vegetation management work may regularly miss important safety hazards.

PacifiCorp has implemented two types of Quality Assurance and Quality Control (QA/QC) audits in its vegetation management practices: ad hoc crew visits and post-work

⁵⁶ PacifiCorp’s 2023-2025 WMP, p. 159.

⁵⁷ Maximo is an asset management, monitoring, and predictive maintenance system developed by IBM. See, [Maximo Application Suite | IBM](#)

⁵⁸ PacifiCorp’s response to CalAdvocates-PacifiCorp-2023WMP-13, Question 01.

⁵⁹ PacifiCorp’s response to CalAdvocates-PacifiCorp-2023WMP-13, Question 01.

⁶⁰ PacifiCorp’s response to CalAdvocates-PacifiCorp-2023WMP-13, Question 01.

audits.⁶¹ Ad hoc crew visits involve PacifiCorp foresters actively reviewing ongoing work with contractors or crew leaders and discussing potential improvements.⁶² If any imminent safety or reliability concerns are identified during these reviews, the audit is halted to promptly address and resolve the issues.

For a more comprehensive evaluation of completed work, PacifiCorp conducts post-work audits in the field. These audits occur after the work is finished and aim to verify if the completed work aligns with PacifiCorp's procedures and standards.⁶³ If any issues or areas for improvement are identified during these audits, they serve as a guide for implementing corrective actions or necessary enhancements. On occasion, post work audits may identify pre-inspection issues, such as “trees needing work that may have been missed.”⁶⁴

In addition, PacifiCorp intends to incorporate pre-inspection audits as a QA/QC process improvement in 2023.⁶⁵

PacifiCorp's 2022 post-work audits identified 58 out of 79 utility lines required corrective actions.⁶⁶ ⁶⁷ 5,542 *new* corrective actions were created as a result of the issues identified by the post-work audits.⁶⁸ PacifiCorp carried out 388 corrective actions in Tier 3 areas and 4,509 in Tier 2 areas.⁶⁹ Although it is reassuring that all the corrective actions from 2022 have been completed,⁷⁰ the sheer magnitude of these actions is concerning. It raises doubts about PacifiCorp's overall effectiveness in vegetation management and highlights the potential heightened risks of wildfires caused by the quality of the initial tree work performed.

⁶¹ PacifiCorp's 2023-2025 WMP, p. 205.

⁶² PacifiCorp's 2023-2025 WMP, p. 205.

⁶³ PacifiCorp's 2023-2025 WMP, p. 205.

⁶⁴ PacifiCorp's 2023-2025 WMP, p. 205.

⁶⁵ PacifiCorp's 2023-2025 WMP, p. 205.

⁶⁶ PacifiCorp's response to CalAdvocates-PacifiCorp-2023WMP-10, question 4:

PacifiCorp defines a “line” as the distribution or transmission line that is scheduled for vegetation management by work activity (annual and/or routine), which generally refers to the entire length of the line.

⁶⁷ PacifiCorp's response to CalAdvocates-PacifiCorp-2023WMP-06, question 5.

⁶⁸ PacifiCorp's response to CalAdvocates-PacifiCorp-2023WMP-06, question 5.

⁶⁹ PacifiCorp's response to CalAdvocates-PacifiCorp-2023WMP-10, question 5.

⁷⁰ PacifiCorp's response to CalAdvocates-PacifiCorp-2023WMP-10, question 5.

Regarding ad hoc crew visits, PacifiCorp acknowledged the absence of a centralized tracking system in 2022,⁷¹ making it challenging to obtain detailed information about these audits. Recognizing this limitation, PacifiCorp has developed a mobile data management software form specifically designed for documenting ad hoc crew visits.⁷² This new system is scheduled to be implemented in 2023, which PacifiCorp asserts will enable improved tracking and analysis of ad hoc crew visits. PacifiCorp hopes that this new system will enhance the overall effectiveness of PacifiCorp's vegetation management QA/QC practices.⁷³

In summary, Energy Safety should direct PacifiCorp to enhance its vegetation management QA/QC methods by implementing the following actions:

- Prioritize the creation of a centralized database dedicated to recording and tracking ad hoc crew visits. This prioritization will facilitate better monitoring, analysis, and evaluation of these visits. PacifiCorp should complete this project in 2023 and report on its effectiveness in its 2024 WMP update.
- Engage independent auditors to provide an unbiased assessment of PacifiCorp's post-work audit process. External auditors can offer fresh perspectives and identify potential areas for improvement. Energy Safety should direct PacifiCorp to retain and pay for an external auditor selected by Energy Safety at shareholder expense, as soon as possible. The auditor should submit a report in the first half of 2024. PacifiCorp's 2024 WMP update should address the auditor's findings and discuss how PacifiCorp is implementing the recommendations.
- Provide quarterly reports on its vegetation management QA/QC performance. These reports should be integrated into PacifiCorp's routine quarterly data reports to keep stakeholders informed about the company's progress and improvements in this area.

These recommendations are important because they foster compliance, transparency, and continuous improvement, ultimately improving the overall effectiveness and success of PacifiCorp's vegetation management QA/QC practices.

⁷¹ PacifiCorp's response to CalAdvocates-PacifiCorp-2023WMP-06, question 4.

⁷² PacifiCorp's response to CalAdvocates-PacifiCorp-2023WMP-06, question 4.

⁷³ PacifiCorp's response to CalAdvocates-PacifiCorp-2023WMP-06, question 4.

D. Public Safety Power Shutoffs

1. Energy Safety should direct PacifiCorp to create a plan in case of de-energizations by sources outside of California.

PacifiCorp’s California service territory relies heavily on transmission lines that bring power from out of state. However, PacifiCorp does not appear to have a plan or strategy to deal with de-energizations triggered by the loss of power from out-of-state sources.

PacifiCorp confirmed that 11 of its 27 transmission circuits have sources outside of California.⁷⁴ PacifiCorp lists “Loss of Transmission Line” as the cause of nine out of its top 10 unplanned outage events in 2021, with its worst outage causing an average of 30 hours lost per customer.⁷⁵ Additionally, PacifiCorp’s Oregon territory has the capability to execute its own Public Safety Power Shutoff (PSPS) events,⁷⁶ which could potentially affect the operations of its California subsidiary.

Despite these facts, PacifiCorp states that it “is unable to determine at this time if the Company has ever experienced any de-energizations [including via PSPS] because of loss of electricity from outside of California.”⁷⁷ PacifiCorp should be able to make this determination and should strive to better understand how its circuits in California are impacted when its Oregon supply is cut off.

PacifiCorp states that it “does not have a Public Safety Power Shutoff (PSPS) plan for events of de-energization of transmission lines that supply power from sources outside of

⁷⁴ Response to Data Request CalAdvocates-PacifiCorp-2023WMP-12, Question 3a and 3b.

⁷⁵ “Loss of Transmission Line” is “[i]f an interruption occurs to distribution customers as a result of events at those [transmission] facilities it designates these outages as Loss of Supply outages and denotes them in this report as Transmission.”

The top worst unplanned outage event in 2021 was dated December 15, 2021 in which 1,037 customers were involved and 1,867,049 customer minutes were lost, giving an average of approximately 1800 minutes per customer or approximately 30 hours per customer. *PacifiCorp (U 901-E) Annual Electric Reliability Report in Compliance with D.16-01-008*, dated July 15, 2022, p. 6.

https://www.pacificpower.net/content/dam/pcorp/documents/en/pacificpower/outages-safety/ca-reliability-report/CA_Annual_Electric_Reliability_Report_2021.pdf

⁷⁶ *PacifiCorp’s Annual Public Safety Power Shutoff Report*, dated December 21, 2022.

https://www.pacificpower.net/content/dam/pcorp/documents/en/pacificpower/outages-safety/wildfire-safety/or-reports/OR_%20Annual_PSPS_Report_December_2022.pdf

⁷⁷ Response to Data Request CalAdvocates-PacifiCorp-2023WMP-12, Question 3d. PacifiCorp also states that “PacifiCorp would need additional time to gather up this information to provide more accurate detail on this question.”

California but transmission inclusion in the PSPS plans is being evaluated.”⁷⁸ PacifiCorp’s responses above demonstrate the need to better understand how the operations of its California subsidiary are affected by the operations of its Oregon subsidiary. Cal Advocates previously commented that the small and multi-jurisdictional utilities should “improve reporting on how decisions made by other utilities affect the small IOU’s PSPS planning.”⁷⁹ This comment is still relevant because PacifiCorp’s inability to answer questions reveals a lack of information. PacifiCorp should improve its planning so that it is prepared for future PSPS events executed by PacifiCorp’s Oregon territory as well as prolonged unplanned outages.

Energy Safety should direct PacifiCorp to examine the effects that “Loss of Transmission Line” events and PSPS events by PacifiCorp’s Oregon subsidiary might have on its California subsidiary. PacifiCorp should develop a plan to mitigate the effects of such de-energizations on its California customers.

E. Wildfire Mitigation Strategy

1. Energy Safety should direct PacifiCorp to establish adequate staffing levels to improve data quality during the WMP evaluation process.

Maintaining transparency and accountability in the evaluation process of the WMP is crucial. However, delays or incomplete data can impede this process. Unfortunately, PacifiCorp has frequently failed to provide timely and comprehensive information, resulting in delays to the WMP evaluation process. PacifiCorp’s WMP submission lacks important information and PacifiCorp has often been delayed in its responses to discover.

Table 3 below lists multiple instances where PacifiCorp requested extensions to respond to data requests (DR) submitted by Cal Advocates. These delays reveal a need to evaluate the existing staffing levels at PacifiCorp. It appears likely that inadequacies or gaps in its staffing have contributed to these delays.

⁷⁸ Response to Data Request CalAdvocates-PacifiCorp-2023WMP-12, Question 3c.

⁷⁹ *Comments of the Public Advocate’s Office on the 2022 Wildfire Mitigation Plan Updates of the Small Investor-Owned Utilities*, dated June 20, 2022, p. 69.

<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=52559&shareable=true>

**Table 3
PacifiCorp’s Extension Requests
for Data Requests Issued by Cal Advocates**

DR ⁸⁰	Date Issued	Original Deadline	Date of Extension Request	Revised Deadline	Date Received	Days Overdue ^{81,82}	Reason Stated
02	2/27	3/13	3/9	3/16	3/16	3	Multiple deadlines and resource constraints
03 ⁸³	2/27	3/27	3/23	3/28	3/31	4	Inability to collect data by deadline
04	2/27	3/27	3/23	5/9	5/10	32	Multiple deadlines and resource constraints
06 ⁸⁴	2/27	4/19	3/23	5/9	5/3	10	SME is not available
07	5/18	5/23	None⁸⁵		5/25	2	SME is not available
08	5/25	5/31	5/31	6/5	6/5	3	SME is not available
10	6/6	6/9	6/7	6/13	6/15 ⁸⁶	4	SME is not available

Note: All dates are in 2023.

In another example, PacifiCorp’s 4th quarter data report for 2022 was incomplete. Table 4 lists several tables that were submitted without complete information, with a promise to supply the missing data in the 1st quarter of 2023. This delay was ascribed to the leave of absence of a pivotal staff member. This incident underscores the importance of evaluating how the absences of individual staff can affect the broader timeline and the delivery of information.

⁸⁰ All data requests listed here follow the numbering format CalAdvocates-PacifiCorp-2023WMP-xx.

⁸¹ Energy Safety, *2023 – 2025 Wildfire Mitigation Plan Process and Evaluation Guidelines*, December 7, 2022, pp. 14 -15. Electrical Utilities have three days to respond to stakeholder data requests during the WMP review period. Data requests received outside the WMP review period are subject to a ten-day response period. PacifiCorp’s 2023 WMP review period began on May 8, 2023.

⁸² Subtract Date Received from Date of Original Deadline.

⁸³ PacifiCorp requested an extension for question 2.

⁸⁴ PacifiCorp requested an extension for question 8.

⁸⁵ PacifiCorp did not contact Cal Advocates at all until after the deadline for responding to the data request. Pursuant to the 2023 WMP Process Guidelines, long-established CPUC practice, and Cal Advocates’ clear discovery instructions, extension requests must be submitted by the response deadline. Cal Advocates does not accept extension requests after a deadline has passed.

⁸⁶ PacifiCorp received approval from OEIS on June 14, 2023, to extend the deadline to June 15, 2023.

Table 4
Missing Information
in Quarterly Data Report for 4th Quarter 2022

Table	Description	Issue	Explanation
2	Projected performance metrics	Blank or missing	PacifiCorp anticipates projections will be provided in the Q1 2023 QDR, once its 2023-2025 WMP is complete.
3	Projected performance metrics	Blank or missing	PacifiCorp anticipates projections will be provided in Q1 2023.
7	Projected service territory and equipment information	Incomplete and missing	Data is being provided starting in Q4 2022. Where applicable, projections will be provided in the Q1 2023 QDR.
8	Projected equipment additions or removals information	Blank or missing	Where applicable, projections will be provided in the Q1 2023 QDR.
9	Projected infrastructure upgrades	Blank or missing	Where applicable, projections will be provided in the Q1 2023 QDR.
10	Projected PSPS metrics	Incomplete	Where applicable, projections will be provided in the Q1 2023 QDR.
11	Projected mitigation initiative financials	Blank or missing	Where applicable, projections will be provided in the Q1 2023 QDR.
12	Projected WMP midyear and End of Year targets	Blank or missing	None
14	HFTD Area Risk Summary	Blank or missing	None
15	Top Risk Circuit Scores	Blank or missing	None

As another example, in multiple instances the WMP data tables provided by PacifiCorp are either devoid of content or fail to provide meaningful insights. Consequently, stakeholders are left without essential information that is necessary for assessing risk reduction and evaluating the efficacy of PacifiCorp’s mitigation strategies. Table 5 below shows that eight key tables from PacifiCorp's 2023 WMP were unhelpful due to the absence of critical information and data.

**Table 5
Missing or Incomplete Data Tables in PacifiCorp’s 2023 WMP**

Table	Title	Issue
6-5	Summary of Top Risk Circuits	No Data Provided ⁸⁷
7-3	Prioritized Areas Based on Overall Risk	No Data Provided ⁸⁸
8-3	Grid Design, Operations, Maintenance Targets by Year	Missing Risk Impact Data
8-4	Asset Inspection Targets by Year	Missing Risk Impact Data
8-5	Grid Design, Operations, Maintenance Metric Results by Year	No Data Provided
8-15	Vegetation Management Targets by Year	Missing Risk Impact Data
8-16	Vegetation Inspections and QA/QC Targets by Year	Missing Risk Impact Data
8-17	Vegetation Management and Inspection Performance Results by Year	No Data Provided
8-20	Number of Past Due Vegetation Management Work Orders by Age	No Data Provided ⁸⁹

Note: Unless specified otherwise, no date was given for the submission of the missing or incomplete data in the table.

The data gaps listed in Table 5 make it difficult for stakeholders to understand PacifiCorp’s wildfire mitigation strategies or to determine whether PacifiCorp is acting as a

⁸⁷ PacifiCorp’s 2023-2025 WMP, p. 91. Pacific Power will be able to identify the highest risk overhead assets and its risk scores and drivers in the Q4 [2023] QDR.

⁸⁸ PacifiCorp’s 2023-2025 WMP, p. 114.

While Pacific Power has begun to utilize WRRM to identify risks and prioritize areas of highest risk and will begin populating Table 7-3 in Q4 of 2023 once the Company has conducted an in-depth analysis of the output. The Overall Utility Risk will be populated once PSPS risk has completed and validated for the Q4-2024 QDR submittal.

⁸⁹ PacifiCorp’s 2023-2025 WMP, p. 207.

In 2022, Pacific Power has created a report that links forms (e.g., inventory and work complete) at a work location. In 2023, this report will be reviewed and modified to allow for tracking of open work locations (locations without a work complete form) to help drive completion of any open work locations prior to end of each calendar year.

prudent manager. It is imperative that PacifiCorp rectify the insufficient information provided in its 2023 WMP.

To avert the recurrence of such shortcomings, PacifiCorp should be required to devote adequate staffing resources to support the WMP development and evaluation process. Doing so will facilitate the expeditious and thorough provision of data, analysis, and clarifications that are instrumental in shaping PacifiCorp's strategies for risk mitigation and how PacifiCorp spends tens of millions of ratepayer dollars.

Furthermore, PacifiCorp should establish backup plans by assessing staffing levels and analyzing the impacts of the absence of essential staff members. These plans could include cross-training of employees, developing "understudies" for pivotal roles, employing interim staff, or reallocating workload with the objective of providing prompt data submittals in spite of the absence of key staff.

In addition, it is essential for PacifiCorp to regularly monitor response times and make necessary adjustments so that processes can be refined. This proactive approach will improve PacifiCorp's ability to respond to data requests and minimize future delays.

PacifiCorp recognizes these deficiencies and pledges to provide most of the missing risk information after the fourth quarter of 2023, with a particular focus on a thorough analysis of its top risk circuits and additional performance indicators.⁹⁰ It is essential that as progress is made, PacifiCorp's efforts are not only focused on supplying this information, but also on ensuring that such omissions do not happen again.

In conclusion, Energy Safety should direct PacifiCorp to:

- Populate all tables with the required information required by the 2023 WMP Technical Guidelines. This missing information should be incorporated into PacifiCorp's 2024 WMP update.
- Develop a staffing plan to adequately support the development, evaluation, and implementation of its WMPs. In order to prevent any delays when key personnel are unavailable, it is important that PacifiCorp analyze the staff resources responsible for responding to data requests and preparing quarterly reports. PacifiCorp should address these issues in its revised 2023 WMP.
- PacifiCorp should furnish additional details regarding the procedures and processes that affirm the accuracy, thoroughness, and reliability of its WMP data. In the upcoming 2024 WMP Update, PacifiCorp should include

⁹⁰ PacifiCorp's 2023-2025 WMP, p. 91.

supportive documents such as internal audit reports, results from validation procedures, and methodologies used for data collection.

By improving its staffing and prioritizing timely and accurate information delivery, PacifiCorp can ensure more transparency and accountability in the WMP evaluation process.

IV. GENERAL RECOMMENDATIONS ON TECHNICAL ISSUES

Cal Advocates is submitting recommendations that affect all three small and multi-jurisdictional utilities (SMJUs) within the document containing our comments on BVES's WMP. For full details, please refer to the *Comments of the Public Advocates Office on Bear Valley Electric Service's 2023 to 2025 Wildfire Mitigation Plan*.

V. CONCLUSION

Cal Advocates respectfully requests that Energy Safety adopt the recommendations discussed herein.

Respectfully submitted,

/s/ **Joseph Lam**

Joseph Lam
Attorney

Public Advocates Office
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, California 94102
Telephone: (213) 576-7067
E-mail: Joseph.Lam@cpuc.ca.gov

June 29, 2023