

**BEFORE THE OFFICE OF ENERGY INFRASTRUCTURE SAFETY
OF THE STATE OF CALIFORNIA**

Office of Energy Infrastructure Safety
Natural Resources Agency

**COMMENTS OF THE GREEN POWER INSTITUTE
ON THE PACIFICORP 2023 WILDFIRE MITIGATION
PLAN REVISION NOTICE RESPONSES**

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The Green Power Institute (GPI), the renewable energy program of the Pacific Institute for Studies in Development, Environment, and Security, provides these *Comments of the Green Power Institute on the PacifiCorp 2023 Wildfire Mitigation Plan Final Revision Notice Responses*.

Introduction

GPI provides comments on the Revision Notices (RNs) issued to PacifiCorp and PacifiCorp's Revision Notice Responses (RNRs).

RN-PC-23-01: PacifiCorp does not provide the status of its 2022 areas for continued improvement.

PacifiCorp provides the required ACI responses in Appendix D. We agree that this addresses the ACI. However, it will be prudent to continue tracking progress on these ACIs, especially those that indicate ongoing development and implementation timelines for critical risk assessment and mitigation selection capabilities (e.g. PC-22-06 and PC-22-09).

RN-PC-23-02: PacifiCorp's mitigation initiative prioritization schematic is missing required details.

PacifiCorp provides an updated graphic outlining: "Current Mitigation Selection Considerations." The graphic is a high-level outline of a risk-informed process. PacifiCorp addressed the RN at a high-level, but the fundamental issues persist regarding insufficient transparency into how mitigation measure selection is determined. Details on how each of the considerations are used to inform the final mitigation selection remain unclear in the updated figure. For example, what is the relationship between risk mitigation selection/scope and "Prioritized on Risk and Practicality?" Is Risk-informed prioritization focused on highest risk locations first, or is risk buydown strategy based on faster deployment across a larger footprint in

lower-risk locations according to ease of build? We also noted that there are no additional changes to the narration in section 7.1.4.2 that clarify how each of the considerations in the figure govern mitigation selection and prioritization decision making, although some additional information is provided in section 7.1.4.1 in response to RN-PC-23-03. We address this below with respect to the RN-PC-23-03 Response.

RN-PC-23-03: PacifiCorp does not clearly describe its current or future mitigation identification and evaluation procedures.

GPI addressed this issue in our comments on the SMJU Base WMP’s, framed as, “The link between updated risk modeling approaches, tools, and outputs and mitigation selection and prioritization are not well defined.”¹ PacifiCorp does provide additional definitions for each of its mitigation selection/prioritization criteria. For example, the RNR states:

Wildfire risk impact – Mitigation initiatives are evaluated to align with industry practices and programs in place at other utilities that have shown to reduce wildfire risk. Mitigation initiatives are prioritized along with known historical causes of risk.²

GPI notes that there is no single source of, or agreement on, “industry practices and programs” for risk-informed deployment of mitigations, such as undergrounding versus covered conductor versus other risk mitigation portfolios. Utilities, including the IOUs, are all using different risk modeling approaches that establish different risk-informed mitigation planning thresholds, which in turn feed into different mitigation selection and prioritization strategies. PacifiCorp’s statement on how it considers “wildfire risk impact” provides no meaningful value with which to assess its current and planned mitigation selection and prioritization approach.

Many aspects that impact the final mitigation selection and prioritization outcomes remain vague, such as a lack of transparency regarding the current analysis completed to assess cost-benefit, the order in which evaluation and selection criteria are applied, and which projects are benefiting from the listed considerations. For example, does PacifiCorp start with a granular planning risk model output and establish *transparent risk mitigation thresholds* that map to a selection of possible mitigation approaches that are weighed based on mitigating local risk-

¹ GPI Comments on the SMJU 2023-2025 WMPs, p. 23-24

² TN13181_20231012T095518_PacifiCorp’s_ Revised_2023_2025_Base_WMP_-_Redline, p. 124

drivers and other factors such as cost-benefit and feasibility? With respect to “Ease of implementation/Constructability,” while taking timely risk mitigation and cost savings opportunities with joint undergrounding efforts into consideration for long-term system hardening is laudable, how is PacifiCorp ensuring that these consideration are balanced with risk-informed mitigation selection and prioritization?³ In another example, it’s not clear when and how “stakeholder and customer input” is operationalized – do “stakeholder groups within the company” include distribution system planners that take into consideration local demand forecasts and possible service limitations, or cost impacts associated with mitigation approach? How is customer input during webinars operationalized? PacifiCorp’s added evaluation and comparison flow diagram regarding, “hypothetical future implementation of RSE” also does not clarify critical details of the current or anticipated process.

The RNR explains that the current process is “primarily qualitative.” The clearest example PacifiCorp provides regarding its risk-informed mitigation selection methodology is that, “in a more remote, heavily forested location with few customer connections, underground can be a cost-effective solution when compared to covered conductor.” This example touches on risk-driver (i.e. heavily forested), consequence (i.e. remote, heavily forested), and “stakeholder inputs,” as well as design/distribution system attributes (i.e. few customer connections). Presumably PacifiCorp SMEs are applying a logic model that includes these and other more detailed attributes for the high-level concepts provided, such as “risk drivers” and “stakeholder input.”

Taking as a case study BVES’s current Fire Safety Circuit matrix, the rubric approach applied to mitigation selection and prioritization provides relatively more transparency regarding both qualitative and quantitative considerations that inform mitigation selection and prioritization. For example, the number of tree attachments term identifies a specific risk-driver that is accounted for in the mitigation selection and prioritization process. A similar format, such as a rubric or decision tree *with clear decision-making standards and order of consideration*, could improve transparency into PacifiCorp’s *current and future* mitigation selection approach.

³ TN13181_20231012T095518_PacifiCorp’s_Revised_2023_2025_Base_WMP_-_Redline, pp 124-125

PacifiCorp has only partially addressed the RN. Our opening comments on the SMJU Base WMPs still stand. The specific relationships governing how each of the mitigation selection/prioritization considerations results in the risk mitigation plan are both currently vague and are also under development. GPI recommends issuing an ACI that addresses the above issues by requiring PacifiCorp to lay out a detailed logic model of the mitigation selection and prioritization method currently in use (e.g. rubric or decision tree), that includes *transparent decision-making standards and order of consideration*.

Progress on new/under-development risk-informed mitigation selection methods must also be closely tracked to ensure that PacifiCorp develops a transparent mitigation selection and prioritization framework that includes model-informed planning standards. This should be achieved by no later than the end of the 3-year WMP cycle, with transparent showings of measurable progress each year. In the event that PacifiCorp and the other SMJUs fail to develop a transparent risk-informed mitigation selection and prioritization method by the 2026-2028 Base WMP filing, the plans should not be approved.

GPI also encourages the OEIS to provide concrete guidance on “best practices” that will help to unify the development of SMJU risk modeling and mitigation selection/prioritization approaches, and/or instruct the SMJUs to develop a joint approach to avoid perpetuating the parallel development of upwards of 6 disparate methodologies.

RN-PC-23-04: PacifiCorp has not assigned imminent threat status to any Level 1 conditions found during inspections from 2020 to 2022 and has not maintained compliance with its existing Level 1 work orders.

The only addition to the 2023-2025 Base WMP is a small two-sentence, high-level, and vague summary on evaluating protocols and procedures, and the assignment of a threat status to Level 1 findings.⁴ It’s not clear to GPI why the WMP summary is so cursory in comparison to the summary provided in the accompanying RNR filing. The RNR also provides additional detail on how PacifiCorp is taking measures to reduce the occurrence of overdue work orders through pre-ordering materials. However, this information was not added to WMP Section 8.1.7 Open Work

⁴ TN13181_20231012T095518_PacifiCorp’s_Revised_2023_2025_Base_WMP_-_Redline, pp 170

Orders. Overall, the RNR does report improvements, namely fewer open Level 1 work orders than reported on in the RN. GPI recommends requiring PacifiCorp to provide a Revised Base WMP that better reflects its RNR.

There appears to be a persistent issue with “Level 1” tag semantics – namely the use of “immediate” in GO 95 Rule 18 versus PacifiCorp’s use of “imminent” as a higher-risk sub-set of all Level 1 tags that warrant “immediate corrective action” instead of their internal 30-day deadline. These two words are agreeably not interchangeable; the definition of “imminent” is that something is “about to happen”, while “immediate” means something that is “occurring or done at once; instant.” So firstly, categorizing a “higher risk” Level 1 tag as “imminent” is confusing, as this is less pressing than “immediate,” which is the policy definition of a Level 1 issue. Regardless, by definition in GO 95 Rule 18, an issue that classifies as a Level 1 tag is an “immediate” threat or risk, and therefore action must be “immediate.” There is no stipulation in GO 95 Rule 18 that permits setting a 30-day timeline for Level 1 tags.

GPI thus agrees with CalAdvocate’s earlier assessment.⁵ Based on existing policy (GO 95 Rule 18), all Level 1 tags, or PacifiCorp’s equivalent Priority A tags, are defined as warranting “immediate” action. While the RNR may address the Revision Notice, PacifiCorp’s relative risk ranking approach that delays “immediate” action for purportedly “non-imminent” Priority A tags is not in compliance with GO 95 Rule 18. PacifiCorp should be required to show that it initiates all Level 1 tag remediation efforts “immediately,” prioritizes Level 1 corrective actions over other tags, completes Level 1 tag work as soon as possible, and that under no condition does it *wait* to address any Level 1 issues. This should occur before the WMP is approved.

We add that additional benchmarking is required when considering PacifiCorp’s approach and tracking methodology (or lack thereof) for identifying some Level 1 tags as relatively higher risk. If parsing and tracking Level 1 tags based on more granular relative risk is a critical capability that is particularly relevant to wildfire mitigation, then it should be established as a best practice for all utilities. OEIS should make a determination as to whether relative risk rankings for Level 1 tags is a “best practice.” If so, this must include requiring each utility to

⁵ TN12671_20230629T162206_Public_Advocates_Office_Comments_on_PacifiCorp_2023_WMP, p. 11

define what qualifies as higher versus lower risk Level 1 tags, how it tracks relative risk within tag reporting and work order systems, and how it achieves the GO 95 Rule 18 requirement for immediate action while also ensuring highest risk Level 1 tags are remedied (e.g. closed) first.

Functionally, for purposes of the WMP, actual corrective work on Level 1 tags may not always, or even typically be “immediate” – that is “immediately” – has no meaningful value for tracking project management timelines, in this case the timely correction of Level 1 work orders for any utility. The entire process from Level 1 tag documentation, solution development/selection, material acquisition, permitting, work scheduling, implementation, QA/QC, and work order close, plus any other interim steps, is presumably not often, “immediate.” CalAdvocates addresses this quantitatively in their “resolution time assessment for 2020-2022 Level 1 Asset orders.”⁶

GPI appreciates this assessment and recommends OEIS investigate Level 1 tag resolution time through an expanded assessment of when Level 1 work orders are opened and subsequently closed or downgraded (e.g. median, average, standard deviation, max, tail, in days) across California, by HFTD, and at individual utilities in order to determine current best practices and whether PacifiCorp’s typical Level 1 work order closure timeline reasonably aligns with current utility standards. This assessment would also help hold utilities accountable to quantifiable best practices for mitigating risk from Level 1 work tags in high wildfire risk areas.

Based on the RNR, GPI also recommends continued monitoring of PacifiCorp’s overdue work orders, and whether its approaches to reduce work delays (e.g. material pre-ordering) are effective.

RN-PC-23-05: PacifiCorp’s 3-year and 10-year vegetation management objectives do not meet Energy Safety requirements as outlined in the Technical Guidelines.

PacifiCorp’s RNR addresses the RN in the Redlined Revised Base WMP.

⁶ TN12671_20230629T162206_Public_Advocates_Office_Comments_on_PacifiCorp_2023_WMP, p. 9

RN-PC-23-06: PacifiCorp does not provide target pass rates for vegetation management quality assurance and control program as required by the Technical Guidelines.

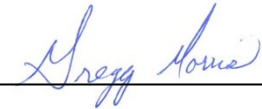
PacifiCorp establishes a yearly Target Pass Rate of 95 percent for all vegetation management activities listed in the Revised Base WMP Table 8-19. However, their updated “Audit Results 2022” is somewhat confusing. For example, it’s not clear if, “72 percent of all miles audited with a pass rate of 94 percent” means that 72 percent of the miles that were audited had a pass rate of 94 percent, or if 72 percent of total work miles were audited AND the audit result was a 94 percent pass rate. GPI suspects it’s the latter. PacifiCorp should clarify its audit reporting in future WMP filings.

Conclusions

We respectfully submit these comments and look forward to reviewing future wildfire mitigation plans and related filings. For the reasons stated above, we urge the OEIS to adopt our recommendations herein.

Dated October 27, 2023.

Respectfully Submitted,



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