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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 revised 2023–2025 Wildfire Mitigation Plan in accordance with Energy Safety's Revision Notice

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 revised 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 yours,

/s/*Marybelle Ang*

Marybelle Ang
Attorney

Public Advocates Office
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, California 94102
Telephone: (415) 696-7329
E-mail: Marybelle.Ang@cpuc.ca.gov

520644853

The Public Advocates Office
California Public Utilities Commission
505 Van Ness Avenue, San Francisco, CA 94102-3298
www.publicadvocates.cpuc.ca.gov

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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 *Revision Notice for PacifiCorp’s 2023-2025 Wildfire Mitigation Plan* (Revision Notice),¹ the Public Advocates Office at the California Public Utilities Commission (Cal Advocates) submits these comments on PacifiCorp’s *2023-2025 Wildfire Mitigation Plan R1* (Revised 2023-2025 WMP) and accompanying Revision Notice Response.²

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.

PacifiCorp filed its 2023-2025 Wildfire Mitigation Plan R0 (Initial 2023-2025 WMP) on May 8, 2023. Cal Advocates filed comments on PacifiCorp’s Initial 2023-2025 WMP on June 29, 2023. On September 11, 2023, Energy Safety issued the Revision Notice to PacifiCorp. PacifiCorp filed its Revision Notice Response and Revised 2023-2025 WMP on October 12, 2023.³

The Revision Notice permits interested persons to file opening comments within 15 days of PacifiCorp’s filing, which is October 27, 2023.⁴ Reply comments are due 10 days thereafter (November 6, 2023). In these comments, Cal Advocates addresses PacifiCorp’s Revision Notice Responses and Revised 2023-2025 WMP, focusing on the new or revised elements.

¹ Energy Safety, *Final 2023-2025 Wildfire Mitigation Plan Process and Evaluation Guidelines*, December 6, 2022; Energy Safety, *Revision Notice for PacifiCorp’s 2023-2025 Wildfire Mitigation Plan*, September 11, 2023 (Revision Notice).

² PacifiCorp, *2023-2025 Wildfire Mitigation Plan R1*, October 12, 2023 (Revised 2023-2025 WMP); PacifiCorp, *2023-2025 Wildfire Mitigation Plan Response to Revision Notice*, October 12, 2023 (Revision Notice Response).

³ Although PacifiCorp’s filing was due on October 11, 2023, it was filed and published on Energy Safety’s docket on October 12, 2023 due to technical glitches in the filing system.

⁴ Revision Notice cover letter, page 1: “Stakeholders may submit comments on PacifiCorp’s Revision Notice Response within 15 days after the publication of PacifiCorp’s Revision Notice Response on the 2023-2025 Wildfire Mitigation Plan docket. Reply comments are due 10 calendar days thereafter.”

II. TABLE OF RECOMMENDATIONS

Revision Notice Number	Recommendation	Timeline for Response	Relevant Section of these Comments
RN-PC-23-01	PacifiCorp must fully comply with Energy Safety’s required progress. [ACI PC-22-05]	As soon as possible	III.A.1
RN-PC-23-01	PacifiCorp must provide all information required to indicate progress. [ACI PC-22-09]	As soon as possible	III.A.1
RN-PC-23-01	PacifiCorp must provide evidence to support its claims about the efficacy of a “new contracted partner” to meet its covered conductor and pole replacement targets. [ACI PC-22-11]	As soon as possible	III.A.1
RN-PC-23-01	PacifiCorp must explain why it has not achieved the required progress. [ACI PC-22-18]	As soon as possible	III.A.1
RN-PC-23-01	PacifiCorp must provide a full analysis of its undergrounding comparison to other initiatives to comply with Energy Safety’s required progress. [ACI PC-22-13]	As soon as possible	III.A.2
RN-PC-23-01	PacifiCorp must provide consistent data about its underground in WMPs and Quarterly Data Reports [ACI PC-22-13]	As soon as possible	III.A.2
RN-PC-23-01	PacifiCorp must provide evidence of its efforts to benchmark technologies to augment current inspections.[ACI PC-22-14]	As soon as possible	III.A.2
RN-PC-23-01	PacifiCorp must fully address Energy Safety’s required progress in implementing risk modeling-informed enhancements in its inspection program and provide a concrete implementation timeline. [ACI PC-22-14]	As soon as possible	III.A.2
RN-PC-23-01	PacifiCorp must fully address Energy Safety’s requirement to separate QA/QC from the individual who performed the original inspection. [ACI PC-22-15]	As soon as possible	III.A.2

Revision Notice Number	Recommendation	Timeline for Response	Relevant Section of these Comments
RN-PC-23-01	PacifiCorp must reevaluate its schematic in light of learning from the best practices of utilities whose WMPs have been approved. PacifiCorp must explain the workings of the schematic in their WMP	As soon as possible	IV.A
RN-PC-23-01	PacifiCorp should include examples of actual, not theoretical, evaluations it has conducted, and use those examples to help improve the accompanying schematic.	As soon as possible	IV.B
RN-PC-23-04	Energy Safety should direct PacifiCorp to improve its asset management procedures.	2025 WMP Update	V.A.3
RN-PC-23-04	Energy Safety should direct PacifiCorp to revisit and refine its policies related to asset condition identification, to ensure they align with other California utility best practices and are articulated clearly.	2025 WMP Update	V.A.3
RN-PC-23-04	Energy Safety should direct PacifiCorp to define clear, unambiguous criteria for “imminent” work orders to ensure consistent understanding.	2025 WMP Update	V.A.3
RN-PC-23-04	Energy Safety should direct PacifiCorp to establish a rapid response team to address level 1 asset work orders, especially for conditions that could escalate during fire season in high fire-threat districts.	2025 WMP Update	V.A.3
RN-PC-23-04	Energy Safety should direct PacifiCorp to engage a third party to conduct an independent audit of its asset condition evaluation policy to identify any process gaps.	2025 WMP Update	V.A.3
RN-PC-23-05	Energy Safety should direct PacifiCorp to prioritize improving its QA/QC program.	2025 WMP Update	VI.A.3
RN-PC-23-05	Energy Safety should direct PacifiCorp to provide plans and objectives to establish a “robust” vegetation management QA/QC program	2025 WMP Update	VI.A.3

Revision Notice Number	Recommendation	Timeline for Response	Relevant Section of these Comments
RN-PC-23-05	Energy Safety should direct PacifiCorp to systematically address feedback from the Independent Auditor in the program objectives.	2025 WMP Update	VI.A.3
RN-PC-23-06	Energy Safety should direct PacifiCorp to action to close the gap with QA/QC targets.	2025 WMP Update	VI.B.3
RN-PC-23-06	Energy Safety should direct PacifiCorp to implement comprehensive training sessions for vegetation management inspectors to ensure they are well-equipped with the latest techniques and best practices in vegetation management. Periodic refresher courses can also help maintain the standard of inspections.	WMP Change Order in 2023	VI.B.3
RN-PC-23-06	Energy Safety should direct PacifiCorp to require that vegetation management inspectors regularly provide feedback and insights from their experience in the field.	WMP Change Order in 2023	VI.B.3
RN-PC-23-06	Energy Safety should direct PacifiCorp to establish a dedicated vegetation management inspector team or committee that reviews feedback and implements process improvements.	WMP Change Order in 2023	VI.B.3
RN-PC-23-06	Energy Safety should direct PacifiCorp to identify other ways of progressively improving the accuracy of vegetation management work and increasing pass rates during QA/QC.	WMP Change Order in 2023	VI.B.3
Additional Comments	Energy Safety should consider establishing an “Enhanced Oversight and Enforcement Process” for utilities that repeatedly fail to fulfill their promises.	Future Rulemaking	VII.A
Additional Comments	Energy Safety should strengthen the connection between the ACIs identified in a final decision and the subsequent WMP.	Technical Guidelines	VII.B

III. GENERAL: AREAS FOR CONTINUED IMPROVEMENT FROM 2022 FINAL DECISION

A. Critical Issue RN-PC-23-01: status of PacifiCorp's 2022 areas for continued improvement

Energy Safety's *Final Decision on PacifiCorp's 2022 Wildfire Mitigation Plan (WMP) Update* (2022 Final Decision) identified 21 areas for continued improvement (ACIs).⁵ The 2023 WMP Technical Guidelines require the utility to provide responses to the ACIs in Appendix D of the 2023-2025 base year submission. PacifiCorp filed a pre-submission 2023-2025 WMP on March 6, 2023. Energy Safety conducted a completeness check; it identified the absence of content in Appendix D and noted other deficiencies in its completeness determination issued to PacifiCorp on March 27, 2023.⁶

Subsequently, PacifiCorp filed its Initial 2023-2025 WMP on May 8, 2023 (version R0) that included responses to the completeness determination. PacifiCorp populated Appendix D, Areas for Continued Improvement (ACI), with the statement, "As Pacific Power identifies areas for continues improvement, an update will be provided."⁷

Energy Safety issued a Revision Notice on September 11, 2023 that directed PacifiCorp to respond to each of the 2022 ACIs in the format required by the Technical Guidelines.⁸ PacifiCorp filed a response to the Revision Notice on October 11, 2023 and a Revised 2023-2025 WMP, which included responses to each ACI.⁹

Cal Advocates reviewed a selection of the most consequential ACIs. Two themes stand out in PacifiCorp's responses: (1) PacifiCorp has not achieved its targets, and (2) PacifiCorp's Revised 2023-2025 WMP responses lack substantial support.

⁵ Energy Safety, *Final Decision on PacifiCorp's 2022 Wildfire Mitigation Plan (WMP) Update* (2022 Final Decision), December 9, 2022 at 86-96.

⁶ Energy Safety, *Determination of Completeness for PacifiCorp's 2023-2025 Wildfire Mitigation Plan Pre-Submission*, March 27, 2023.

⁷ PacifiCorp, Initial 2023-2025 WMP at 385.

⁸ Energy Safety, Revision Notice at 4.

⁹ PacifiCorp, Revised 2023-2025 WMP at 387-399.

1. PacifiCorp fails to fulfill its commitments in several areas for continued improvement.

- PC-22-05: Prioritization Based on Risk Analysis
- PC-22-09: Applying Joint Lessons Learned Concerning Covered Conductor
- PC-22-11: Failure to Meet Grid Hardening Targets
- PC-22-18: Inadequate Justification of Initiative-Selection Process

In ACI PC-22-05, Energy Safety required PacifiCorp to provide an update on its progress toward prioritizing mitigations based on risk analysis.¹⁰ Although PacifiCorp does discuss its transition from qualitative to quantitative risk modeling,^{11, 12} PacifiCorp’s Revised 2023-2025 WMP does not meet PacifiCorp’s one-year Risk Assessment and Mapping objectives set forth in Table 5.1 of its 2022 WMP.¹³ PacifiCorp also did not fulfill its one-year objective in Resource Allocation and Methodology to “Fully implement WRRM model [Wildfire Risk Reduction Model], including RSE [risk-spend efficiency] calculations,” or its statement that, “By year-end 2022, PacifiCorp plans to implement the full suite of Technosylva’s ... software throughout its California service territory.”^{14, 15} PacifiCorp repeatedly states its intention to comply with Energy Safety’s required progress in this area. However, PacifiCorp has not complied, as

¹⁰ 2022 Final Decision at 88. ACI PC-22-05 states:

In its 2023 WMP, PacifiCorp must:

- Provide an update on its progress using risk model output to inform its initiative plans based on highest risk areas, including determination of top risk percentages, for all initiatives, including covered conductor and undergrounding.
- Explain how PacifiCorp plans to use its risk model to inform both operations and mitigation planning.

¹¹ PacifiCorp’s qualitative risk model was called the Localized Risk Assessment Model (LRAM). The newer, quantitative model is called the Wildfire Risk Reduction Model (WRRM).

¹² Revised 2023-2025 WMP at 66 et seq. (section 6.1.1).

¹³ PacifiCorp, *2022 Revised Wildfire Mitigation Plan* (Revised 2022 WMP), July 15, 2022 at 111.

¹⁴ Revised 2022 WMP at 115 and 165, respectively.

¹⁵ Further, PacifiCorp claimed that “the procurement of Technosylva, which aligns with the general risk modeling methodology used by other utilities, will better prepare the company for the 2023 WMP guidelines — where updated risk modeling guidelines are anticipated.” Revised 2022 WMP at 67.

evidenced by the Independent Evaluator’s 2022 report on PacifiCorp’s 2022 WMP, which discussed PacifiCorp’s underspending on Technosylva’s tools.¹⁶

As for covered conductors (ACI PC-22-09), Energy Safety (1) found that PacifiCorp “has not provided goals and timelines for implementing lessons learned from the covered conductor effectiveness joint study,” and (2) identified numerous actions PacifiCorp must take to show required progress.¹⁷ PacifiCorp’s Revised 2023-2025 WMP, however, does not provide most of the items required to indicate progress. In particular, the Revised 2023-2025 WMP does not include “a concrete list of goals with planned dates of implementation for any lessons learned in the covered conductor effectiveness joint study.”¹⁸ The requested table provides very limited data; PacifiCorp only incorporates the table into the Revised 2023-2025 WMP in Appendix D.¹⁹ PacifiCorp did not update the relevant sections of the main body of the WMP with this information.²⁰

With respect to ACI PC-22-11 (Failure to Meet Grid Hardening Targets), PacifiCorp pins its future achievement of grid hardening goals (covered conductor and pole replacement) on a “new contracted partner.”²¹ Cal Advocates has previously expressed concern that it is unrealistic to expect that retaining a contractor will improve PacifiCorp’s grid hardening initiatives in 2023.²² PacifiCorp’s Revised 2023-2025 WMP does not provide evidence to support its claims about the efficacy of a “new contracted partner” to meet its covered conductor and pole replacement targets.²³

¹⁶ NV5, Inc. and Guidehouse, Inc., *2022 Wildfire Mitigation Plan Independent Evaluator Annual Report on Compliance: PacifiCorp* (PacifiCorp 2022 IE Report), July 26, 2023 at 21, 32-34.

¹⁷ 2022 Final Decision at 90.

¹⁸ 2022 Final Decision at 90.

¹⁹ Revised 2023-2025 WMP at 392.

²⁰ Revised 2023-2025 WMP Section 7.1.4.1 at 115 et seq.

²¹ Revised 2023-2025 WMP at 142, 144.

²² Cal Advocates, *Comments of the Public Advocates Office on PacifiCorp’s 2023 to 2025 Wildfire Mitigation Plan*, June 29, 2023 (Cal Advocates Comments on PacifiCorp’s Initial 2023-2025 WMP) at 6-7.

²³ Revised 2023-2025 WMP at 141-142. PacifiCorp states that the new contracted partner:

is expected to facilitate delivery of the various aspects of line rebuild projects, such as project management, project controls, project reporting, engineering, estimating, permitting, surveying, material management, construction, and post construction

In ACI PC-22-18 (regarding the initiative selection process), Energy Safety stated in its 2022 Final Decision that PacifiCorp:

must provide RSE [risk-spend efficiency] estimates for its mitigation initiatives and implement them in its initiative selection process in its 2023 WMP Update. PacifiCorp must also clearly demonstrate where quantified, risk reduction values and RSE estimates are being considered in its decision-making process.²⁴

PacifiCorp does not explain why it has not achieved the required progress; it simply states that it is “beginning to implement Risk Spend Efficiency (RSE) to evaluate the effectiveness of proposed mitigations relative to cost” and “expects to present RSE for select mitigations in the 2024 WMP.”²⁵ Consequently, PacifiCorp’s Revised 2023-2025 WMP does not comply with Energy Safety’s 2022 Final Decision.

2. PacifiCorp’s WMP responses do not provide the substantive analyses required by Energy Safety.

- PC-22-13: Selection of Undergrounding Projects
- PC-22-14: Further Development of Integrating Risk-Informed Decision Making for Inspection Scheduling and Planning
- PC-22-15: Improvement of Quality Assurance and Quality Control (QA/QC) Process

Several of PacifiCorp’s ACI responses in the Revised 2023-2025 WMP are not substantive. ACI PC-22-13 stated that PacifiCorp “has not provided enough detail in terms of how it selected its undergrounding projects, particularly when accounting for risk allocation methodologies.”²⁶ Thus, Energy Safety required that PacifiCorp “provide full analysis on benefits of undergrounding in comparison to other initiatives, including covered conductor.”²⁷

PacifiCorp’s Revised 2023-2025 WMP does not provide the required analysis. Instead, PacifiCorp states:

inspections. Pacific Power anticipates that the new contracted partner will begin supporting the delivery of covered conductor in 2023.

However, PacifiCorp does not provide evidence to support these assertions.

²⁴ 2022 Final Decision at 94-95.

²⁵ Revised 2023-2025 WMP at 397.

²⁶ 2022 Final Decision at 92.

²⁷ 2022 Final Decision at 92.

During scoping of the lines, the question is asked whether the line should be rebuilt with covered conductor or undergrounded. For the lines undergrounded, those were selected either through requirements due to lines access or input from other entities such as the Shasta Trinity National Forest and the Klamath National Forest.²⁸

PacifiCorp’s analysis appears to be a simple decision tree that considers very few inputs.

Additionally, PacifiCorp provides inconsistent data about its undergrounding work in 2022. With respect to undergrounding included in rebuild work, PacifiCorp states that it “completed 62 miles of line rebuild which includes one mile of undergrounding” in 2022.²⁹ Yet PacifiCorp’s Quarterly Data Reports for 2022 Q4 and 2023 Q2 show different data, none of which appears to document the one mile of undergrounding that PacifiCorp claims.³⁰

In its description of ACI PC-22-14, Energy Safety stated that “PacifiCorp has not implemented risk modeling-informed enhancements in its inspection program.”³¹ PacifiCorp’s response to the ACI points to the “evaluation and possible establishment of High Fire Risk Areas (HFRA)” insofar as those future initiatives would alter inspection programs.³² However, PacifiCorp’s discussion of HFRA does not address the substance of the required progress, which requires that it implement “risk modeling-informed enhancements in its inspection program.”³³

Moreover, the asset inspections section of PacifiCorp’s Revised 2023-2025 WMP does not address Energy Safety’s concerns.³⁴ Energy Safety required benchmarking technologies to augment current inspections; PacifiCorp offers no evidence of its efforts, just a statement that it has benchmarked. Finally, PacifiCorp does not provide a “a concrete timeline detailing when PacifiCorp plans to implement risk modeling-informed enhancements for each of its inspection types.”³⁵

²⁸ Revised 2023-2025 WMP at 395.

²⁹ Revised 2023-2025 WMP at 142.

³⁰ PacifiCorp Quarterly Data Reports for 2022 Q4 and 2023 Q2, files: *TN11823_20230201T154117_PC_2022_Q4_Tables115_R0.xlsx* and *TN12841_20230801T144752_2023_Q2_Tables.xlsx*, Tables 7, 8, and 11.

³¹ 2022 Final Decision at 92.

³² Revised 2023-2025 WMP at 395.

³³ 2022 Final Decision at 92.

³⁴ Revised 2023-2025 WMP at 146.

³⁵ 2022 Final Decision at 92.

PacifiCorp fails to address some requirements of ACI PC-22-15 regarding quality assurance and quality control for asset inspections.³⁶ Although PacifiCorp’s treatment of quality assurance and quality control is detailed,³⁷ it does not address Energy Safety’s requirement to “complete QA/QC of asset inspections either internally or using a contractor that differs from the contractor who performed the initial inspection.”³⁸ Instead, PacifiCorp states that, “nonconforming results are sent to the inspection contractor for reinspection along with the required reinspection timeline.”³⁹ This statement does not demonstrate that PacifiCorp has implemented Energy Safety’s requirement to separate QA/QC from the individual who performed the original inspection.⁴⁰

In summary, PacifiCorp’s responses to three crucial ACIs lack substance and fail to address important elements of the required progress specified by Energy Safety. Regarding the selection of undergrounding projects (ACI PC-22-13), PacifiCorp does not provide the required analysis of alternatives. Similarly, regarding risk-informed planning of asset inspections (ACI PC-22-14), PacifiCorp does not address several elements of required progress, such as a timeline for implementing risk-informed improvements to its asset inspections. Regarding quality assurance and quality control for asset inspections (ACI PC-22-15), PacifiCorp does not show that QA/QC is performed by different inspectors than those in the original inspection. Overall, PacifiCorp’s responses to these ACIs are inadequate.

IV. WILDFIRE MITIGATION STRATEGY DEVELOPMENT

A. Critical Issue RN-PC-23-02: PacifiCorp’s current mitigation selection considerations schematic lacks functionality.

The Revision Notice directs PacifiCorp to revise the mitigation initiative prioritization schematic to comply with the Technical Guidelines.⁴¹ PacifiCorp’s revised schematic improves

³⁶ 2022 Final Decision at 93. Energy Safety stated in ACI PC-22-15 that “PacifiCorp’s QA/QC process for asset inspections currently lacks documentation and does not show how it uses lessons learned to inform changes on future inspections or trainings.”

³⁷ Revised 2023-2025 WMP at 160 et seq. (section 8.1.6).

³⁸ 2022 Final Decision at 93.

³⁹ Revised 2023-2025 WMP at 161.

⁴⁰ 2022 Final Decision at 93.

⁴¹ Revision Notice at 4-5.

upon the original, and PacifiCorp includes all of the required procedures and evaluation tools. However, PacifiCorp does not clearly explain how these elements are “used to evaluate and prioritize potential mitigation initiatives.”⁴² PacifiCorp does not include a discussion of the schematic and its workings. PacifiCorp does not update the text introducing the schematic and persists in referring to it as “high level” even though Energy Safety specifically requested a detailed schematic.⁴³ PacifiCorp should evaluate the schematics developed by other utilities to consider improvements to the schematic that will make it more useful.

B. Critical Issue RN-PC-23-03: PacifiCorp’s Revised 2023-2025 WMP does not describe its process for performing cost-effectiveness evaluation when selecting mitigations.

PacifiCorp’s Revised 2023-2025 WMP adds useful information in response to Energy Safety’s concerns regarding mitigation identification and evaluation procedures.⁴⁴ However, neither the additional schematic (page 119) nor the accompanying text clearly describes PacifiCorp’s current process.⁴⁵ To fully comply with the Revision Notice, PacifiCorp should include examples of actual, not theoretical, evaluations it has conducted, and use those examples to help improve the accompanying schematic.

V. GRID DESIGN, OPERATIONS, AND MAINTENANCE

A. Critical Issue RN-PC-23-04: Energy Safety should direct PacifiCorp to improve the identification and management of level 1 asset work orders.

1. PacifiCorp’s definition of an “imminent” level 1 asset work order is too stringent.

When a utility identifies an urgent asset maintenance problem, that work order is deemed “imminent” and must be addressed immediately – typically within a day. Because the concept of an “imminent” level 1 asset work order plays a pivotal role in electric utility maintenance, it is critical to understand the criteria that define an “imminent” asset work order.

PacifiCorp provides minimal clarity surrounding the criteria used to classify a level 1 asset work order as “imminent.” This ambiguity can lead to adverse consequences, as it may lead

⁴² Revision Notice at 4.

⁴³ Revised 2023-2025 WMP at 120; Revision Notice at 4-5.

⁴⁴ Revised 2023-2025 WMP at 115 (section 7.1.4.1); Revision Notice at 5-6.

⁴⁵ Revised 2023-2025 WMP at 119.

to miscommunications or delays in taking action to correct level 1 asset work orders. Any delay in correcting an imminent problem could lead to an “immediate safety and/or reliability risk with high probability for significant impact.”⁴⁶ Therefore, PacifiCorp should establish a clear definition of what constitutes an “imminent” level 1 asset work order.

To better understand this issue, Cal Advocates examined all level 1 asset work orders PacifiCorp identified from the period of 2020 to 2022. The primary objective was to identify and understand the criteria used to characterize “imminent” asset work orders. Absent a clear definition of “imminent,” any level 1 asset work orders with a response time of one day or less would be identified as “imminent.”⁴⁷ Cal Advocates could not identify any level 1 asset work orders to conclusively meet the “imminent” classification.⁴⁸ Likewise, PacifiCorp states that it is unable to identify any “imminent” work orders during this time period.⁴⁹ Compounding the issue is the fact that PacifiCorp does not keep separate records for “imminent” conditions, which significantly hinders a full understanding of PacifiCorp’s asset management practices.⁵⁰

These findings indicate that PacifiCorp’s criteria for classifying an asset work order as “imminent” are overly restrictive, which, in practice, limits this classification to a narrow set of conditions that are rarely, if ever, met.⁵¹ Another concerning possibility is that PacifiCorp’s asset management practices may have failed to identify or address critical asset conditions.

Both possibilities raise the following questions regarding PacifiCorp’s inspection procedures and its real-world application of the “imminent” classification: (1) whether PacifiCorp consistently and effectively identifies imminent asset problems in its inspections; and

⁴⁶ California Public Utilities Commission, General Order 95, Section 1, Rule 18.

⁴⁷ Revision Notice Response at 13.

⁴⁸ Cal Advocates Comments on PacifiCorp’s Initial 2023-2025 WMP at 11 - 13.

⁴⁹ Revision Notice Response at 13.

⁵⁰ Revision Notice Response at 12.

No work orders were “categorized” as imminent threat because the company does not maintain a separate records category for “imminent” A priority conditions.

⁵¹ Revision Notice Response at 12.

An A priority condition which poses a significant present threat to human life or property is considered an imminent threat A priority condition. PacifiCorp policy requires immediate corrective action of an imminent threat A priority condition. Most A priority conditions do not pose a significant present threat to human life or property and are, therefore not considered imminent.

(2) whether PacifiCorp can address the blind spots in how it evaluates asset conditions. These uncertainties and their associated risks highlight the pressing need for clearer definitions and improved record-keeping practices. These steps will enhance the identification and handling of level 1 asset work orders that should be considered an “imminent” threat.

2. PacifiCorp’s extended response time to correct level 1 asset work orders is not prudent.

From 2020 to 2022, PacifiCorp’s average time from inspection to correction for a level 1 asset work order was 19.25 days.⁵² Cal Advocates’ previous comments expressed specific concern over level 1 asset work orders that involved vegetation contact with bare conductors, decaying poles, and damaged conductors – all serious hazards with a significant likelihood of igniting a fire or otherwise endangering the public.⁵³ PacifiCorp’s response time to correct these specific conditions is particularly concerning during fire season, a period that demands the utmost urgency.

These extended response times suggest a significant vulnerability within PacifiCorp’s asset management policy. The fact that these work orders are not treated with immediate attention could reflect a gap in recognizing the real dangers they pose. During fire season, environmental conditions can exacerbate the rapid spread of wildfires, and seemingly minor issues can rapidly escalate into catastrophic events. A single damaged conductor, for example, can trigger a fire that significantly harms public safety.

3. Remedy: Energy Safety should direct PacifiCorp to improve its asset management procedures.

An external, independent third party should review PacifiCorp's existing asset management policy. Improving how PacifiCorp manages level 1 asset work orders not only enhances efficiency; it is needed to decrease the risk of catastrophic wildfires caused by PacifiCorp’s assets. Improvements may include forming rapid response maintenance teams and, most importantly, establishing an internal policy that gives due priority to “imminent” level 1 asset work orders. PacifiCorp should acknowledge that it needs to act quickly and effectively to address level 1 asset work orders that have the potential to cause catastrophic wildfires.

⁵² Cal Advocates Comments on PacifiCorp’s Initial 2023-2025 WMP, Figure 1, at 10. Average of days to complete level 1 asset work orders.

⁵³ Cal Advocates Comments on PacifiCorp’s Initial 2023-2025 WMP at 8-14.

Energy Safety should provide direct guidance to PacifiCorp to ensure its asset management policies and practices are in line with the best standards to prevent wildfire risks and protect public safety. By establishing clear policies, rapid response resources, and third-party evaluations, PacifiCorp can mitigate the most concerning asset conditions:

- Energy Safety should direct PacifiCorp to revisit and refine its policies related to asset condition identification, to ensure they align with other California utility best practices and are articulated clearly. A clear policy framework, communicated transparently, can prevent ambiguities, and instill trust among stakeholders.
- Energy Safety should direct PacifiCorp to define clear, unambiguous criteria for “imminent” work orders to ensure consistent understanding. Misunderstandings or inconsistencies in interpreting which work orders are “imminent” can result in delays or mis-prioritizations, with significant wildfire risk and public safety implications.
- Energy Safety should direct PacifiCorp to establish a rapid response team to address level 1 asset work orders, especially for conditions that could escalate during fire season in high fire-threat districts. Given the identified delays, streamlined, rapid response mechanisms can reduce the time to address potential threats, which will mitigate risks.
- Energy Safety should direct PacifiCorp to engage a third party to conduct an independent audit of its asset condition evaluation policy to identify any process gaps. An objective, external perspective can offer insights into areas of improvement, and ensure that all potential “imminent” threats are identified and addressed in a timely manner.

VI. VEGETATION MANAGEMENT AND INSPECTIONS

A. Critical Issue RN-PC-23-05: PacifiCorp's revised vegetation management objectives omit essential aspects of a comprehensive QA/QC program.

1. PacifiCorp's 3-year and 10-year vegetation management objectives lack significant QA/QC improvements.

The Revision Notice identifies ambiguities in PacifiCorp’s three-year and ten-year plan objectives for vegetation management.⁵⁴ Energy Safety determined that the original objectives of PacifiCorp, with phrases like “continue to improve” and “continue progressing our program,”

⁵⁴ Revision Notice Response at 15.

were vague and lacked actionable specifics.⁵⁵ PacifiCorp’s Revised 2023-2025 WMP amends its objectives to include new initiatives such as “create [subject matter expert] process & procedure for VM database review four times a year,” which focuses on improving subject matter expertise. Another new objective, to “develop training content for specialized equipment used for inspecting vegetation for conditions that increase wildfire risks,” signals a desire to educate employees on how to use equipment more effectively.⁵⁶ However, despite these revisions, PacifiCorp’s revised vegetation management three- and ten-year objectives pose significant challenges, described below.

2. PacifiCorp fails to address the Independent Evaluator feedback on improving its vegetation management QA/QC program.

External feedback often serves to shed light on areas that might otherwise be overlooked. A case in point is the feedback provided by the WMP Independent Evaluator concerning PacifiCorp’s Vegetation Management QA/QC program. The Independent Evaluator report underscored a significant gap in PacifiCorp’s vegetation management: the absence of a “robust vegetation management QA/QC program,” which is pivotal to ensure both quality and regulatory compliance.⁵⁷ The revisions to PacifiCorp’s three-year and ten-year plan objectives miss this key element. PacifiCorp’s omission is troubling, given the long-term nature of these goals.⁵⁸ This oversight represents a missed opportunity for PacifiCorp to strengthen its vegetation management strategy.

3. Remedy: Energy Safety should direct PacifiCorp to prioritize improving its QA/QC program.

To improve vegetation management results, PacifiCorp should set a three-year objective to establish a more comprehensive QA/QC program for vegetation management. A renewed focus on the fundamental elements of vegetation management, including a robust QA/QC system, is imperative.

⁵⁵ Revision Notice Response at 15.

⁵⁶ Revised 2023-2025 WMP at 182.

⁵⁷ PacifiCorp 2022 IE Report at 55.

⁵⁸ Revised 2023-2025 WMP at 182-183.

Energy Safety should direct PacifiCorp to take the following actions in its 2025 WMP Update submission:

- Provide plans and objectives to establish a “robust” vegetation management QA/QC program. A comprehensive QA/QC program promotes standardization, quality checks, and the effectiveness of vegetation management actions, reducing potential risks.
- Systematically address feedback from the Independent Auditor in the program objectives. External feedback provides valuable insights that can be instrumental in enhancing vegetation management effectiveness. Disregarding such feedback can result in missed opportunities.

Implementing these remedies will help ensure consistency and quality in PacifiCorp’s vegetation management program.

B. Critical Issue RN-PC-23-06: PacifiCorp failed to achieve QA/QC targets on vegetation management inspections.

1. PacifiCorp failed to achieve target pass rates.

The Revision Notice identifies PacifiCorp’s failure to provide target pass rates for vegetation management QA/QC results in 2022 and directs PacifiCorp to develop targets.⁵⁹ PacifiCorp’s Revised 2023-2025 WMP responds to this directive.⁶⁰ However, PacifiCorp’s Revised 2023-2025 WMP shows that the utility has not met some of its targets.⁶¹ Achieving QA/QC targets is crucial for electric utilities, especially in the inherently risky area of vegetation management.

To its credit, PacifiCorp has aimed for a 95 percent pass rate for QA/QC audits in 2022. However, PacifiCorp has recorded a shortfall in two key areas: distribution routine cycle maintenance and distribution annual corrective work. Specifically, the distribution routine cycle maintenance (which involves corrective issues that result from detailed vegetation management inspections) fell short by a narrow margin, achieving a 94 percent pass rate.⁶² More concerning was the annual distribution corrective work, which is tied to patrol inspections, and which

⁵⁹ Revision Notice Response at 16.

⁶⁰ Revised 2023-2025 WMP, Table 8-19 Vegetation Management QA/QC Program at 206-207.

⁶¹ Revised 2023-2025 WMP, Table 8-19 Vegetation Management QA/QC Program at 206-207.

⁶² Revised 2023-2025 WMP, Table 8-19 Vegetation Management QA/QC Program at 206-207.

registered a 91percent pass rate.⁶³ PacifiCorp does not furnish any rationale for, or analysis of, these two critical misses.⁶⁴

2. Remedy: Energy Safety should direct PacifiCorp to action to close the gap with QA/QC targets.

In light of PacifiCorp’s vegetation management QA/QC results for the year 2022, proactive measures are necessary to enhance the effectiveness of PacifiCorp’s vegetation management program. Energy Safety’s guidance is essential to promptly address these shortcomings and mitigate any potential risks in PacifiCorp’s QA/QC processes. Energy Safety should direct PacifiCorp to take the following steps:

- Implement comprehensive training sessions for vegetation management inspectors to ensure they are well-equipped with the latest techniques and best practices in vegetation management. Periodic refresher courses can also help maintain the standard of inspections.
- Require that vegetation management inspectors regularly provide feedback and insights from their experience in the field.
- Establish a dedicated vegetation management inspector team or committee that reviews feedback and implements process improvements.
- Identify other ways of progressively improving the accuracy of vegetation management work and increasing pass rates during QA/QC.

Energy Safety should direct PacifiCorp to submit a WMP change order by the end of 2023 to implement these measures in 2024. PacifiCorp should also address these issues in its 2025 WMP Update submission.

⁶³ Revised 2023-2025 WMP, Table 8-19 Vegetation Management QA/QC Program at 206-207.

⁶⁴ See Revised 2023-2025 WMP at 205-207 (Section 8.2.5).

VII. ADDITIONAL COMMENTS

A. Energy Safety should consider establishing an “Enhanced Oversight and Enforcement Process” for utilities that repeatedly fail to fulfill their promises.

Wildfire mitigation plans have evolved substantially since Energy Safety created the policies and procedures to implement legislative mandates.⁶⁵ Energy Safety has created a regulatory framework to adapt to those mandates — especially given the varying quality of utility responses.

Energy Safety has developed processes for review and revision requests, pre-submission versions and completeness checks, and the integration of stakeholder comments into the final decision on a utility’s WMP.⁶⁶ However, it appears that, even after several iterations of WMP review and approval (completeness checks and revision requests), some utilities are repeatedly submitting incomplete and insufficient WMPs. Furthermore, as explained in Section II above, PacifiCorp has not fulfilled its commitments. This lackluster level of performance is not acceptable.

The Commission established an “Enhanced Oversight and Enforcement Process” (EOE) in Decision (D.) 20-05-053 (regarding PG&E’s bankruptcy plan of reorganization). Steps 1 and 2 in this process require the utility to develop a corrective action plan “designed to correct or prevent a recurrence of the ... triggering event, or otherwise mitigate an ongoing safety risk or impact”; the utility, its executives, and its board members must report regularly on its progress.⁶⁷ At higher steps, the EOE process can also lead to the appointment of an independent monitor to oversee implementation of the corrective action plan, a restructuring officer, or a receiver.⁶⁸ At present, the EOE process only applies to PG&E.

The process detailed in D.20-05-053 could be applied to other utilities and adapted to suit Energy Safety’s needs, pursuant to Energy Safety’s authority to adopt regulations as necessary to carry out its duties and statutory responsibilities.⁶⁹ Energy Safety has the authority to conduct

⁶⁵ SB 1028, SB 901, AB 111, AB 1054, and others.

⁶⁶ See, e.g., the 2023 WMP Process Guidelines, which established the pre-submission completeness check process and which describe the process for revision notices.

⁶⁷ D.20-05-053, Appendix A at 2-3.

⁶⁸ D.20-05-053, Appendix A at 4-8.

⁶⁹ Section 326 of the California Energy Infrastructure Safety Act, sections 8385 to 8389 of the Public

investigations, determine compliance, and issue notices of defects or violations.⁷⁰ Adopting the additional tool of an EOE process would give Energy Safety the ability to coalesce enforcement around a trend and direction for a single utility and to pull together the threads of non-compliance. An EOE process would save time and effort for Energy Safety and the stakeholders that repeatedly observe similar performance and non-compliance issues. Moreover, improving utility wildfire mitigation performance and compliance with their own WMPs would decrease the risk of a catastrophic wildfire caused by utility infrastructure.

B. Energy Safety should strengthen the connection between the areas for continued improvement (ACIs) identified in a final decision and the subsequent WMP.

The 2023 WMP Technical Guidelines establish a requirement that WMPs include responses to the ACIs from the final decision on the previous WMP.⁷¹ Energy Safety also instructs utilities that “specific potential sources of lessons learned” can be gleaned from “feedback from Energy Safety or other authoritative bodies.”⁷² The thread connecting one WMP to its successor runs through the ACIs, yet the utility’s responses to ACIs are isolated in an appendix in the subsequent WMP. This format lacks clearly identified tie-ins to the discussions of the same issues within the body of the WMP.

Energy Safety should revise the Technical Guidelines to require that a subsection be added to each WMP discussion section that pertains to an ACI. The utility should identify the ACI by number and explain how the discussion section was changed to satisfy the ACI. Concrete linkages between one WMP and the next will promote iterative learning and progress. It will also help stakeholders and the public better utilize their resources to provide useful feedback on the utility’s WMP.

Cal Advocates also addressed areas for continued improvement in greater detail in its comments on the 2025 Wildfire Mitigation Plan Updates.⁷³ The comments herein supplement and support our previous comments.

Utilities Code, and Government Code section 15473(c)(2)(E).

⁷⁰ Government Code sections 15473(c)(2)(D), 15475.1, and 15475.2, respectively.

⁷¹ 2023 WMP Technical Guidelines at Appendix D-1.

⁷² 2023 WMP Technical Guidelines at 207.

⁷³ Cal Advocates, *Comments of the Public Advocates Office on Guidelines for the 2025 Wildfire*

VIII. CONCLUSION

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

Respectfully submitted,

/s/ **Marybelle Ang**

Marybelle Ang
Attorney

Public Advocates Office
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, California 94102
Telephone: (415) 696-7329
E-mail: Marybelle.Ang@cpuc.ca.gov

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