

November 22, 2023

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Re: CA 2023-WMPs

OEIS-P-WMP 2023-PC-008

Please find enclosed PacifiCorp's response to OEIS data request 8.1 and Attachment OEIS 8.1.

If you have any questions, please call me at (503) 813-7314.

Sincerely,

\_\_\_/s/\_\_ Pooja Kishore Manager, Regulation

## **OEIS Data Request 8.1**

**Revision Notice Response RN-PC-23-04:** PacifiCorp's Revision Notice Response to RN-PC-23-04 addresses several of the concerns raised by Energy Safety regarding PacifiCorp's classification and response to Level 1 work orders. However, PacifiCorp does not include the responses in its Revised WMP.

- i. Energy Safety required PacifiCorp to update its WMP with the following:
  - (1) A plan to determine which failure modes can result in imminent threats;
  - (2) A strategy to perform audits on inspections that have resulted in the identified failure modes;
  - (3) An evaluation of all Level 1 work orders created from 2020 to 2023;
  - (4) A description of PacifiCorp's procedures and capability to track interim repairs to imminent threat conditions; and
  - (5) A process to update procedures, inspection practices and training materials to identify imminent threats.

While PacifiCorp responded to these remedies in its Revision Notice Response, it did not include any of this relevant information in its Revised WMP as directed in Energy Safety's Revision Notice, and only updated Section 8.1.6 to state that it has evaluated its current procedures and protocols, and reviews procedures and protocols on an annual basis.

Confirm PacifiCorp intended its Section 8.1.6 of the Revised WMP to correspond with the information provided in its Revision Notice Response.

- ii. Energy Safety also required PacifiCorp to update Section 8.1.7 with the following:
  - (1) Resourcing allocation plans for workforce and equipment needs;
  - (2) An update on open level 1 work orders at Revised WMP publication; and
  - (3) A plan to analyze the delays PacifiCorp faced resolving Level 1 work orders in a timely fashion from 2020 to 2023.

2023-WMPs/ PacifiCorp November 22, 2023 OEIS-PacifiCorp-2023WMP

## **Response to OEIS Data Request 8.1**

Please refer to Attachment OEIS 8.1 which provides a copy of the PacifiCorp's 2023 Revised Wildfire Mitigation Plan (WMP) and specifically refer to Section 8.1.6, pages 161-163 and Section 8.1.7, pages 165-167.