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Re: CA 2023-WMPs
OEIS-P-WMP_2023-PC-009

Please find enclosed PacifiCorp's responses to OEIS data requests 9.1-9.3 and Attachment OIES 9.3.

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

Sincerely,

 /s/
Pooja Kishore
Manager, Regulation

OEIS Data Request 9.1

Regarding PacifiCorp’s AFN customers: On page 306 of its WMP, PacifiCorp states that as of January 17, 2023, its total AFN population was 781 customers. However, PacifiCorp also states that, as a result of an update made to its CARE application in 2021, “an additional 1,470 AFN customers (total) throughout the service territory”. It appears the number of AFN customers in PacifiCorp’s service territory has decreased since 2021.

- i. Please confirm the number of additional AFN customers identified as a result of PacifiCorp’s 2021 update to its CARE application.
- ii. Please confirm the total number of AFN customers in PacifiCorp’s service territory after additional AFN customers were accounted for as a result of PacifiCorp’s 2021 update to its CARE application (i.e., the sum of PacifiCorp’s total AFN customers pre-CARE application updates plus PacifiCorp’s additional AFN customers post-CARE application updates).
- iii. Please confirm the total number of AFN customers in PacifiCorp’s territory as of January 17, 2023.

Response to OEIS Data Request 9.1

- i. The number of additional Access and Functional Needs (AFN) customers for each year is not reported here. Upon review of the narrative in the final paragraph on page 306 of PacifiCorp’s 2023 Wildfire Mitigation Plan (WMP), the Company has made the modification shown below:

California Alternate Rates for Energy (CARE) applications are sent to all residential customers. In 2021, Pacific Power added a check box on the CARE application asking customers to identify as AFN. As a result of the update to the CARE applications, approximately 60 percent of the Company’s AFN customers have reported through this AFN identification channel. Given the positive results, Pacific Power intends to retain this feature.

- ii. The total number of AFN customers for each year since 2021 are shown below:

	2021	2022	2023
# AFN	247	467	781

- iii. The number is reported correctly in the first paragraph on page 306 of PacifiCorp’s 2023 WMP; there are a total of 781 AFN customers in PacifiCorp’s California service territory.

OEIS Data Request 9.2

Regarding Lessons Learned: In Section 10 of its WMP, PacifiCorp provides Table 10-1 “Lessons Learned”; however, PacifiCorp did not provide a narrative on its lessons learned. Provide the following:

- i. A brief narrative describing the new key lessons learned since PacifiCorp’s 2022 WMP Update and a status update on any ongoing improvements due to existing lessons learned.
- ii. A summary of how PacifiCorp continuously monitors and evaluates its wildfire mitigation efforts to identify lessons learned. This must include various policies, programs, and procedures for incorporating feedback to make improvements.

Response to OEIS Data Request 9.2

- i. PacifiCorp’s key area of focus continues to be enhancing data analytics and modeling capabilities to greater align with some of the experiences gathered through internal analysis and subject matter expertise, external industry collaboration and benchmarking, feedback from stakeholders and regulators. The Company has made a significant investment in ongoing collaboration with other utilities as well as investments in datasets for a multitude of programs within risk assessment and situational awareness categories. Existing lessons learned or experiences supported the procurement of Technosylva for Risk Spend Efficiency (RSE) and the establishment of a wildfire mitigation program delivery team which is planned to track, monitor, and report on the implementation of all programs
- ii. PacifiCorp monitors wildfire mitigation efforts through the collection and evaluation of program updates provided on, at least, a quarterly basis. This process is continually evolving, and experiences are gained through subject matter expertise or external industry collaboration. As information is received, and programs are updated, where appropriate, policies, programs and procedures will be updated to align with needed program changes.

OEIS Data Request 9.3

Regarding PacifiCorp’s Risk Assessment Improvement Plan: On page 100 of its WMP, PacifiCorp provides Table 6-10 “Risk Assessment Improvement Plan”. This table is missing timeframes and key milestones for multiple of PacifiCorp’s proposed improvements. Please provide an updated table to include the timeframe and key milestones for each proposed improvement.

Response to OEIS Data Request 9.3

Please refer to Attachment OEIS 9.3 which provides an updated version of Table 6-10 (Risk Assessment Improvement Plan) to PacifiCorp’s 2023 Wildfire Mitigation Plan (WMP).