



February 12, 2024

Allen Berreth
Vice President of Transmission and Distribution Operations
PacifiCorp dba Pacific Power
825 NE Multnomah Street, Suite 2000
Portland, OR 97232

Subject: Office of Energy Infrastructure Safety Request for PacifiCorp’s Final 2023-2025 Wildfire Mitigation Plan

Dear Mr. Berreth:

PacifiCorp submitted its 2023-2025 Wildfire Mitigation Plan (WMP) to the Office of Energy Infrastructure Safety (Energy Safety) on May 8, 2023. Energy Safety assessed PacifiCorp’s WMP, including all associated errata and responses to data requests, and published a draft Decision on PacifiCorp’s 2023-2025 WMP on December 28, 2023. Within 10 days of Energy Safety’s Decision on PacifiCorp’s WMP, PacifiCorp must submit to the docket a final version of its WMP that includes previously submitted errata, changes resulting from the Revision Notice, as well as the corrections for the errata listed in Appendix A of this letter.¹

Sincerely,

A handwritten signature in black ink, appearing to read 'Suzie'.

Suzie Rose
Program Manager, Electric Safety Policy Division
Office of Energy Infrastructure Safety

¹ Energy Safety’s 2023-2025 WMP Process and Evaluation Guidelines, Sections 4.3 and 4.4.2, pp. 5-7: <https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53287&shareable=true> (accessed October 5, 2023).

APPENDIX A

Non-Substantive Errata

PacifiCorp must correct the following:

- Update Table 3-1 “Statutory Requirements Checklist”. The description for code section (c)(8) as “Plans for vegetation management” is incorrect; this should be the description for (c)(9). The correct (c)(8) requirement (“Identification of circuits that have frequently been deenergized [...]”) is missing from the table. Please correct requirement (c)(8) and update all subsequent code sections, descriptions, and relevant WMP section/page numbers in Table 3-1.
- Update Table 3-1 “Statutory Requirements Checklist” WMP Section/Page column to include applicable section and page number references and hyperlinks for all requirements. Missing references for (c)(10), (c)(12), and (c)(15).
- Update planned spend in Table 4-2 “Summary of WMP Expenditures” for all years 2020-2022 as follows:
 - 2020 Planned (as reported in the 2020 WMP)
 - 2021 Planned (as reported in the 2021 WMP Update)
 - 2022 Planned (as reported in the 2022 WMP Update)Also update table number from 4-2 to Table 4-1 to match the Technical Guidelines and update all Section 4 table numbers accordingly.
- Renumber Section 5.4.2 “Communities at Risk from Wildfires” to Section 5.4.3 “Communities at Risk from Wildfire” and renumber all subsequent Section 5 subsections accordingly.
- Renumber Table 5-10 “Example of Relevant State and Federal Environmental Laws, Regulations, and Permitting Requirements for Implementing the WMP” to Table 5-6.
- Update “Within an hour of event even closure, the real time system [...]” to “Within an hour of event closure, the real time system [...]” in Section 6.5, page 93.
- Renumber Table 6-10 “Risk Assessment Improvement Plan” to Table 6-7 and update the in-text citation on page 99 with the appropriate table number.
- Update “Figure 7-78 shows the timeline for implementation of RSE calculations for grid hardening initiatives” to “Figure 7-7 shows the timeline for implementation of RSE calculations for grid hardening initiatives” in Section 7.1.4.1, page 120.
- Update section reference in Table 9-4 “PSPS Objectives (10-year plan)” on page 315 with the correct section number.
- Renumber Table 10-1 “Lessons Learned” ID# column. Number 8 was skipped.