

April 2, 2024

VIA OEIS E-FILING

Office of Energy Infrastructure Safety
715 P Street, 20th Floor
Sacramento, CA 95814
efiling@energysafety.ca.gov

RE: PacifiCorp 2023 Wildfire Mitigation Plan – Annual Compliance Report

Dear Director Jacobs:

PacifiCorp d/b/a Pacific Power (PacifiCorp or the Company) provides the attached 2023 Annual Compliance Report pursuant to Public Utilities Code § 8386.3(c)(1), addressing the Company's compliance with its WMP over the prior compliance period (calendar year 2023). This Report is submitted in accordance with the Office of Energy Infrastructure Safety's September 2023 Compliance Guidelines.

If you have any questions regarding this request, please contact Pooja Kishore, Regulatory Affairs Manager at (503) 813-7314.

Sincerely,



Matthew McVee
Vice President, Regulatory Policy and Operations

cc: Docket No. 2023-EC_ARC
compliance@energysafety.ca.gov

**2023 ANNUAL REPORT ON COMPLIANCE
SUBMITTED BY PACIFICORP (U 901 E)
REGARDING COMPLIANCE WITH ITS 2023-2025 WILDFIRE MITIGATION PLAN**

Pursuant to the California Public Utilities Code Section 8386.3(c)(1), PacifiCorp d/b/a Pacific Power (PacifiCorp or the Company) provides this Annual Report on Compliance (ARC) addressing implementation of PacifiCorp's 2023-2025 Wildfire Mitigation Plan (WMP). PacifiCorp's final 2023-2025 WMP Update was submitted February 22, 2024.

BACKGROUND

During calendar year 2023, the Company worked diligently to implement the measures set forth in the 2023-2025 WMP and the feedback received in the Office of Energy Infrastructure Safety's (Energy Safety's) December 9, 2022 final Decision on PacifiCorp's 2022 Wildfire Mitigation Plan (WMP) Update. The Company previously reported detailed 2023-2025 WMP progress in quarterly submissions to the Office of Energy Safety (Energy Safety) throughout 2023 and early 2024. These include Pacific Power's four 2023 Quarterly reports submitted May 2023, August 2023, November 2023, and February 2024.

PacifiCorp submits this 2023 ARC in accordance with the requirements set forth in the September 2023 Compliance Process issued by the Office of Energy Infrastructure Safety.

This report addresses each of the five components in a distinct subsection, for the reporting period of January 1, 2023, through December 31, 2023.

1. *Objective Progress*

a. *Discussion on Objective Progress*

A clear description of the electrical corporation’s progress towards achieving the objectives for the three-year WMP plan cycle, as identified in its most recently approved WMP. Progress must be discussed individually for each stated objective.

Pacific Power continues to make progress on achieving the objectives identified in the Company’s three-year WMP plan cycle. The below section addresses the individual progress for each objective stated in the Summary of Plan Objectives table from section 4.2 pg. 29 of the Company’s 2023-2025 WMP.

Summary of Plan Objectives

Initiative Category	Objectives
Risk Methodology and Assessment	<ul style="list-style-type: none"> • Complete implementation of WRRM and ignition risk assessment in 2023. • Complete PSPS risk assessment in 2024. • Continue refinement of RSE calculation methodology and calculate RSE for grid hardening initiatives
Grid Design, Operations, and Maintenance	<ul style="list-style-type: none"> • Continue execution of grid hardening plans. • Continue planned inspection programs, including Infra-red (IR) inspections on transmission lines. • Begin implementation of the IR inspection on distribution lines. • Continue to deploy EFR (Elevated Fire Risk) settings.
Vegetation Management	<ul style="list-style-type: none"> • Continue progressing programs (annual patrols, routine cycle work and annual pole clearing). • Implement Enhanced Overhang Reduction pilot project.
Situational Awareness and Forecasting	<ul style="list-style-type: none"> • Complete implementation of FPI (Fire Potential Index). • Deployment of Wildfire Detection Network (wildfire detection cameras and smoke sensors) • Evaluate DFA (Distribution Fault Anticipators) • Expand weather station network.
Emergency Preparedness	<ul style="list-style-type: none"> • Continued use of tabletop exercises to prepare for emergencies and PSPS events. • Incorporate feedback and industry best practices into emergency management practices. • Implement improvements to Public Safety Partner Portal (PSP Portal)
Community Outreach and Engagement	<ul style="list-style-type: none"> • Enhance customer outreach based on survey feedback and industry best practices. • Implement customer feedback from post season wildfire mitigation surveys into future outreach efforts. • Increase outreach to AFN populations
PSPS	<ul style="list-style-type: none"> • Evaluate expansion of the free portable battery and backup electric power rebate programs.

Risk Methodology and Assessment

Complete implementation of Wildfire Risk Reduction Model (WRRM) and ignition risk assessment in 2023 – Pacific Power has completed the implementation of its Wildfire Risk Reduction Model (WRRM) and has identified circuits with the highest ignition risk using ranked composite risk scores within the California service territory. WRRM is currently in use and will help calculate risk reduction for various mitigation efforts and initiatives.

Complete Public Safety Power Shutoff (PSPS) risk assessment in 2024 – The Company has initiated the development of PSPS risk calculations last year and continues to work through the solution to quantify PSPS probability and consequences. The first version of the PSPS risk assessment is expected to be completed in 2024.

Continue refinement of Risk Spend Efficiency (RSE) calculation methodology and calculate RSE for grid hardening initiatives – Pacific Power continues refining its RSE calculation by working with and comparing the Company’s calculation to other larger California utilities. The Company is collaborating with other utilities to help determine improvements and refinements to its own calculations and plans to continue measuring and calculating RSE for the Company’s grid hardening initiatives.

Grid Design, Operations, and Maintenance

Continue execution of grid hardening plans – Pacific Power is continuing to progress through its grid hardening plan of line rebuild program to install covered conductor, replacement of distribution and transmission wooden poles, enhanced fault detection capabilities through the installation of system automation equipment, and replacement of expulsion fuses. Detailed information of completions for 2023 can be found in subsection 1(b) below.

Continue planned inspection programs, including Infra-red (IR) inspections on transmission line – The company completed 700 miles of IR inspection for the program plan on transmission lines in Q2 and Q3 of 2023. The vendor flying helicopters inspects Pacific Power transmission lines using IR cameras, checking for hotspots which could indicate equipment failure or potential future incidents. These findings are then reported and follow up detailed inspections or corrections can then be scheduled. This is an annual program and is scheduled to continue in 2024.

Begin implementation of the IR inspection on distribution lines – Pacific Power expanded the IR inspection program in 2023 to include the inspection of distribution lines in the High Fire Threat District (HFTD). This will be an annual program and is scheduled to continue in 2024.

Continue to deploy EFR (Elevated Fire Risk) settings - Pacific Power continues to deploy EFR settings on capable devices in the service territory. The Company also continues to upgrade

current protective devices to increase the network of EFR capable devices and coverage on additional lines.

Vegetation Management

Continue progressing programs (annual patrols, routine cycle work and annual pole clearing) – Pacific Power continues to progress through vegetation inspections, routine cycle work and pole clearing around distribution and transmission electric lines. Detailed information of completions for 2023 can be found in subsection 1(b) below.

Implement Enhanced Overhang Reduction pilot project – In 2023, Pacific Power conducted enhanced overhang reduction pruning in the targeted project areas in the High Fire Threat District (HFTD). Approximately 3 line miles were treated with the enhanced overhang reduction specification. In 2024, Pacific Power will visually inspect the trees that were treated under this project scope to gauge tree response.

Situational Awareness and Forecasting

Complete implementation of FPI (Fire Potential Index) – FPI was procured from Technosylva and implemented in 2023 and is in current use. Additional detail can be found in subsection 1(c) below.

Deployment of Wildfire Detection Network (wildfire detection cameras and smoke sensors) – Pacific Power installed and deployed 2 wildfire detection cameras and 20 smoke sensors in 2023 and expects to install six additional wildfire cameras in 2024.

Evaluate DFA (Distribution Fault Anticipators) – Pacific Power installed two DFAs in 2023 and found that it was difficult to ascertain the accuracy of reports and data received to support limited false positives and direct actionable information. Device reports did not have specific location data capabilities that would be helpful for locating faults and Pacific Power is looking to discontinue this initiative in 2024.

Expand weather station network – The company expanded its weather station network by installing 15 additional weather stations in 2023 and plans to continue expanding the weather station network with installs in 2024.

Emergency Preparedness

Continued use of tabletop exercises to prepare for emergencies and PSPS events – Pacific Power conducted a tabletop exercise in Q1 of 2023, focusing on Siskiyou, Shasta, and Del Norte counties to prepare local communities in case of a PSPS event.

Incorporate feedback and industry best practices into emergency management practices – Pacific Power participated in workshops, international and national forums, consortiums, and advisory

boards in 2023 to maintain an understanding of existing best practices and collaborates with industry experts regarding new technologies and research.

Implement improvements to Public Safety Partner Portal (PSP Portal) – Pacific Power continues to work through improvements to the PSP Portal. Planned improvements consist of ensuring compliance with California Public Utilities Commission (CPUC) web-based Public Safety Partner Portal requirements, interactive mapping requirements, and to support Pacific Power’s efforts to prioritize restoration, backup power evaluation, additional communications, and other resources before, after and during PSPS events.

Community Outreach and Engagement

Enhance customer outreach based on survey feedback and industry best practices & Implement customer feedback from post season wildfire mitigation surveys into future outreach efforts – Based on learnings from 2023 surveys, Pacific Power is able to use the data and build a better understanding of the approach and content for future customer outreach and industry best practices. The Company continues to conduct surveys in 2024 to inform improvements and enhancements to outreach efforts.

Increase outreach to Access and Functional Needs (AFN) populations - Pacific Power made webpage updates and created brochures and fliers to increase its outreach to the AFN population. This also included sending out more physical mailers and efforts to identify additional customers who are AFN eligible.

PSPS

Evaluate expansion of the free portable battery and backup electric power rebate programs – Pacific Power is evaluating the sustainability of the program in the long term, looking at potentially offering extended warranties to delivered batteries, and efforts to increase program awareness to increase the number of eligible customers.

b. Progress Description Details

A clear description of the electrical corporation’s progress towards achieving the three-year objectives listed in the tables in Section 8 of its WMP, including all subsections, with completion dates within the recently completed compliance period.

Objectives for Three Years (2023–2025)	Applicable Initiative(s), Tracking ID(s)	Reference (section & page #)	Completion Date	Progress Summary
Continue execution of grid hardening plans.	GH-01, GH-02, GH-03, GH-04, GH-05	8.1.2	December 2025 for 2023-2025 targets	Installed 101 line miles of covered conductor. Replaced 165 transmission poles. Replaced 1,592 distribution poles. Installed 36 system automation devices.
Replace all expulsion fuses within the HFTD	GH-05	8.1.2.12	December 2025	Completed 4,297 fuse replacements.
Incorporation of IR technology for enhanced inspections	AI-06, AI-07	8.1.3.5, 8.1.3.6	January 2024	Completed 1,457 miles of infrared (IR) Inspections on transmission and distribution lines.
Continue planned inspection programs	AI-01, AI-02, AI-03, AI-04, AI-05, AI-08	8.1.3	Annually to January 2025	Completed 11,678 transmission patrol inspections. Completed 50,444 distribution patrol inspections. Completed 2,714 transmission detail inspections. Completed 8,627 distribution detail inspections. Completed 935 transmission intrusive pole inspections. Completed 2,398 distribution intrusive pole inspections.
Continue planned transmission and distribution wires maintenance	MA-01	8.1.4	Annually to January 2025	All weather stations in service by end of year 2022 were maintained in 2023. Will continue annual maintenance for stations in 2024.
Continue planned substation apparatus maintenance programs	MA-01	8.1.4	Annually to January 2025	All weather stations in service by end of year 2022 were maintained in 2023. Will continue annual maintenance for stations in 2024.
Continue to deploy EFR (Elevated Fire Risk) settings	GO-02	8.1.8	Ongoing activity	Pacific Power continues to deploy EFR settings on capable devices in the service territory. The company also continues to upgrade current protective devices to increase the network of EFR capable devices and coverage on additional lines.
Create subject matter expert (SME) process & procedure for vegetation management database review four times a year.	VM-11	8.2.2	December 2024	Pacific Power is transitioning to a new mobile work management software data collection process is anticipated to differ from current and will begin development in 2024. The company will look to reassess this initiative in the future.

Objectives for Three Years (2023–2025)	Applicable Initiative(s), Tracking ID(s)	Reference (section & page #)	Completion Date	Progress Summary
Develop audits to provide understanding of the data collection process.	VM-11	8.2.5	December 2024	Pacific Power is transitioning to a new mobile work management software data collection process. Implementation is expected in 2025.
Create procedure for exchanging best practices with other CA electrical corporations and implementing information into training and quality assurance.	VM-11	8.2.5	December 2024	Pacific Power attends recurring meetings with other California utilities where management practices are discussed. Formalization of the company’s procedure is planned to occur in 2024.
Create QA/QC process and procedure for benchmarking data in the database and inspections.	VM-11	8.2.5	December 2025	Pacific Power is transitioning to a new mobile work management software data collection process is anticipated to differ from current and will begin development in 2024. Implementation is expected in 2025.
Develop training content for specialized equipment used for inspecting vegetation for conditions that increase wildfire risk.	VM-03, VM-11	8.2.7	December 2025	Pacific Power has developed training content for specialized equipment by having the vendor perform an equipment demonstration and a question and answer session for internal employees.
Install Wildfire Detection Cameras	SA-04	8.3.4.1	November 2025	Installed 2 cameras in 2023 and expect to install 6 more in 2024.
Partner with the Department of Homeland Security for Wildland Fire Sensors Program	SA-03	8.3.4.1	Ongoing – Beginning March 2023	Completed Pacific Powers portion of the study for 2023.
Evaluate DFA (Distribution Fault Anticipation)	SA-02	8.3.3.1	Ending in 2024	Pacific Power installed 2 DFAs in 2023 and found that it was difficult to quantify the accuracy of data provided. Device reports did not have specific location data capabilities that would be helpful for locating faults and Pacific Power is looking to discontinue this initiative in 2024.
Expand weather station network	SA-01	8.3.2	December 2025	Installed 15 additional weather stations in 2023 expanding out Pacific Power's weather station network. Additional weather stations are planned for install in 2024 and 2025.

Objectives for Three Years (2023–2025)	Applicable Initiative(s), Tracking ID(s)	Reference (section & page #)	Completion Date	Progress Summary
Continue the use of tabletop exercises to prepare for emergencies and PSPS events.	EP-02	8.4.3	Annually in Q1/Q2	Pacific Power conducted a tabletop exercise in Q1 of 2023 focusing on the Siskiyou, Shasta, and Del Norte counties to prepare local communities in case of a PSPS event.
Complete Internal staff ECC (Emergency Coordination Center) and Department Operations Center (DOC) 3- year training program	EP-01	8.4.2	2025	Emergency Coordination Center staff continue to be trained in accordance with California OEIS curriculum standards for a Type III Utility Representative credential through identified course material online, workshops, and in person.
Implement improvements to Public Safety Partner Portal (PSP Portal)	EP-03	8.4.4	2024	Pacific Power continues to work through improvements to the Public Safety Partner Portal. Planned improvements consist of ensuring compliance with CPUC web based Public Safety Partner Portal requirements, interactive mapping requirements, and to support Pacific Power’s efforts to prioritize restoration, backup power evaluation, additional communications, and other resources before and during PSPS events.
Perform Pre and Post-fire season customer survey	CO-01	8.5.2	Pre-Season Survey Once a year in Q2 Post-Season Survey Once a year in Q4	Pacific Power completed its pre- and post-season surveys for 2023.
Continue partnering with public safety partners in communities throughout California regarding wildfire safety and preparedness and PSPS	CO-03	8.5.4	Oct. 2025	Pacific Power participates in ongoing meetings with the wildfire advisory board, completed 1 tabletop exercise, 1 workshop, and 1 functional exercise. The company plans to attend safety and preparedness fairs in the future.
Increase outreach to AFN populations	CO-02	8.5.3	Oct. 2025	Pacific Power made webpage updates and created brochures and fliers to increase its outreach to the Access and Function Needs (AFN) population. This also included sending out more physical mailers and efforts to identify additional customers who are AFN eligible.

Objectives for Three Years (2023–2025)	Applicable Initiative(s), Tracking ID(s)	Reference (section & page #)	Completion Date	Progress Summary
Implement customer feedback from post season wildfire mitigation surveys into future outreach efforts	CO-01	8.5.2	Oct. 2025	Based on 2023 surveys, Pacific Power is able to use the data and build a better understanding of the approach and content for future customer outreach and industry best practices. The company continues to receive survey feedback in 2024 to implement improvements and enhancements to outreach efforts.

c. Completed Description Details

A detailed assessment of the electrical corporation’s completion of the three- year objectives listed in the tables in Section 8 of its WMP, including all subsections, with completion dates within the most recently completed compliance period.

Objectives for Three Years (2023–2025)	Applicable Initiative(s), Tracking ID(s)	Reference (section & page #)	WMP Completion Date	Completion Date	Method of Verification Explanation	Incomplete Reasoning
Calculate Fire Potential index	SA-06	8.3.6	May 2023	May 2023	Pacific Power received a screenshot of the FPI calculation running in the third-party software	N/A

FPI was completed and implemented in 2023 on the third party software, allowing the Company to update the data inputs used in the District Fire Risk categories to quantify the potential for large or consequential wildfires several days based on such factors as weather, fuels, and terrain inputs.

d. *Assessment*

An assessment of the electrical corporation’s completion of all targets identified for each initiative listed in the tables in Section 8 of its WMP, including all subsections, with target completion dates within the most recently completed compliance period.

Initiative Activity	Target & Unit	Target Completion Date	Date of Completion	Method of Verification	Expected Percentage Risk Reduction	QA/QC Quality
Line Rebuild - Covered conductor installation	130 Line miles	Year-End 2023	N/A	N/A	N/A - Risk Reduction % is not able to be calculated at this time.	N/A

Completion Assessment – N/A

Incomplete Explanation – Pacific Power was unable to complete 29 line miles of the 130 line miles planned for installation. The Company faced challenges from mandatory evacuations and resource constraints due to the HEAD Fire and Smith River Complex fire that occurred in Q3 2023 which resulted in reduced work. The Company also dealt with a delay in critical permitting and mobilization of design and construction resources. Pacific Power has taken corrective action by obtaining a contract partner for 2024 and already began acquiring critical permits in 2023 for the unfinished work.

Initiative Activity	Target & Unit	Target Completion Date	Date of Completion	Method of Verification	Expected Percentage Risk Reduction	QA/QC Quality
Distribution Pole Replacement	2,600 poles	Year-End 2023	N/A	N/A	N/A - Risk Reduction % is not able to be calculated at this time.	N/A

Completion Assessment – N/A

Incomplete Explanation – Pacific Power was unable to complete 1,008 pole replacements of the 2,600 planned. The Company faced challenges from mandatory evacuations and resource constraints due to the HEAD Fire and Smith River Complex fire that occurred in Q3 2023 which resulted in reduced work. The Company also dealt with a delay in critical permitting and mobilization of design and construction resources. Pacific Power has taken corrective action by obtaining a contract partner for 2024 and already began acquiring critical permits in 2023 for the unfinished work.

Initiative Activity	Target & Unit	Target Completion Date	Date of Completion	Method of Verification	Expected Percentage Risk Reduction	QA/QC Quality
Transmission Pole Replacement	260 poles	Year-End 2023	N/A	N/A	N/A - Risk Reduction % is not able to be calculated at this time.	N/A

Completion Assessment – N/A

Incomplete Explanation – Pacific Power was unable to complete 85 pole replacements of the 260 planned. The Company faced challenges from mandatory evacuations and resource constraints due to the HEAD Fire and Smith River Complex fire that occurred in Q3 2023 which resulted in reduced work. The Company also dealt with a delay in critical permitting and mobilization of design and construction resources. Pacific Power has taken corrective action by obtaining a contract partner for 2024 and already began acquiring critical permits in 2023 for the unfinished work.

Initiative Activity	Target & Unit	Target Completion Date	Date of Completion	Method of Verification	Expected Percentage Risk Reduction	QA/QC Quality
Installation of system automation equipment	40 devices	Year-End 2023	N/A	N/A	N/A - Risk Reduction % is not able to be calculated at this time.	N/A

Completion Assessment – N/A

Incomplete Explanation – Pacific Power was unable to complete 4 device installations of the 40 planned for install. The company faced challenges from mandatory evacuations and resource constraints due to the HEAD Fire and Smith River Complex fire that occurred in Q3 which resulted in reduced work. Corrective action has already been scoped for 2024 and resources began work in Q1.

Initiative Activity	Target & Unit	Target Completion Date	Date of Completion	Method of Verification	Expected Percentage Risk Reduction	QA/QC Quality
Expulsion fuse replacement	5,000 Fuse Locations	Year-End 2023	N/A	N/A	N/A - Risk Reduction % is not able to be calculated at this time.	N/A

Completion Assessment – N/A

Incomplete Explanation – Pacific Power was unable to complete 853 expulsion fuse replacements of the 5,000 planned. Due to a material delivery delay, not all of the planned work for expulsion fuses could occur. Pacific Power plans to receive the material in Q1 of 2024 and will begin work to finish out 2023 targets.

Initiative Activity	Target & Unit	Target Completion Date	Date of Completion	Method of Verification	Expected Percentage Risk Reduction	QA/QC Quality
Transmission Patrol Inspections	11,754 inspections	Year-End 2023	Q4 2023	Completed work orders/FPI Data	N/A - Risk Reduction % is not able to be calculated at this time.	N/A

Completion Assessment – Pacific Power utilized the Company's Facility Point Inspection (FPI) database to confirm inspections and reviewed that against completed work orders.

Incomplete Explanation – N/A

Initiative Activity	Target & Unit	Target Completion Date	Date of Completion	Method of Verification	Expected Percentage Risk Reduction	QA/QC Quality
Distribution Patrol Inspections	50,474 inspections	Year-End 2023	Q4 2023	Completed work orders/FPI Data	N/A - Risk Reduction % is not able to be calculated at this time.	N/A

Completion Assessment – Pacific Power utilized the Company's Facility Point Inspection (FPI) database to confirm inspections and reviewed that against completed work orders.

Incomplete Explanation – N/A

Initiative Activity	Target & Unit	Target Completion Date	Date of Completion	Method of Verification	Expected Percentage Risk Reduction	QA/QC Quality
Transmission Detail Inspections	2,715 inspections	Year-End 2023	Q4 2023	Completed work orders/FPI Data	N/A - Risk Reduction % is not able to be calculated at this time.	N/A

Completion Assessment – Pacific Power utilized the Company's Facility Point Inspection (FPI) database to confirm inspections and reviewed that against completed work orders.

Incomplete Explanation – N/A

Initiative Activity	Target & Unit	Target Completion Date	Date of Completion	Method of Verification	Expected Percentage Risk Reduction	QA/QC Quality
Distribution Detail Inspections	8,662 inspections	Year-End 2023	Q4 2023	Completed work orders/FPI Data	N/A - Risk Reduction % is not able to be calculated at this time.	N/A

Completion Assessment – Pacific Power utilized the Company's Facility Point Inspection (FPI) database to confirm inspections and reviewed that against completed work orders.

Incomplete Explanation – N/A

Initiative Activity	Target & Unit	Target Completion Date	Date of Completion	Method of Verification	Expected Percentage Risk Reduction	QA/QC Quality
Transmission Intrusive Pole Inspections	935 inspections	Year-End 2023	Q4 2023	Completed work orders/FPI Data	N/A - Risk Reduction % is not able to be calculated at this time.	N/A

Completion Assessment – Pacific Power utilized the Company's Facility Point Inspection (FPI) database to confirm inspections and reviewed that against completed work orders.

Incomplete Explanation – N/A

Initiative Activity	Target & Unit	Target Completion Date	Date of Completion	Method of Verification	Expected Percentage Risk Reduction	QA/QC Quality
Distribution Intrusive Pole Inspections	2,404 inspections	Year-End 2023	Q4 2023	Completed work orders/FPI Data	N/A - Risk Reduction % is not able to be calculated at this time.	N/A

Completion Assessment – Pacific Power utilized the Company's Facility Point Inspection (FPI) database to confirm inspections and reviewed that against completed work orders.

Incomplete Explanation – N/A

Initiative Activity	Target & Unit	Target Completion Date	Date of Completion	Method of Verification	Expected Percentage Risk Reduction	QA/QC Quality
Enhanced (Infrared) Inspections in transmission lines	700 line miles	Year-End 2023	Q4 2023	Completed work orders/FPI Data	N/A - Risk Reduction % is not able to be calculated at this time.	N/A

Completion Assessment – Pacific Power utilized the Company's Facility Point Inspection (FPI) database to confirm inspections and reviewed that against completed work orders.

Incomplete Explanation – N/A

Initiative Activity	Target & Unit	Target Completion Date	Date of Completion	Method of Verification	Expected Percentage Risk Reduction	QA/QC Quality
Enhanced (Infrared) Inspections in distribution lines	810 line miles	Year-End 2023	N/A	N/A	N/A - Risk Reduction % is not able to be calculated at this time.	N/A

Completion Assessment – N/A

Incomplete Explanation – Pacific Power was unable to complete 53 miles of the 810 miles of planned IR inspections. The HEAD fire prevented access to distribution lines during peak loading intervals which is when IR inspections are done. Additionally, some lines were not accessible by the vehicle with the IR camera and due to peak loading constraints, there were no alternate plans to inspect those lines in 2023. Pacific Power is pursuing alternative inspection methodologies such as drones, for 2024 to be used for the inspections and the sections that were not able to be inspected in 2023 will be included in the 2024 plan.

Initiative Activity	Target & Unit	Target Completion Date	Date of Completion	Method of Verification	Expected Percentage Risk Reduction	QA/QC Quality
Substation Inspections (Minor, Major, Security, and Infrared)	451 inspections	Year-End 2023	N/A	Completed work orders/SAP Data Submission(s)	N/A - Risk Reduction % is not able to be calculated at this time.	N/A

Completion Assessment – Pacific Power utilized the Company's Facility Point Inspection (FPI) database to confirm inspections and reviewed that against completed work orders.

Incomplete Explanation – N/A

Initiative Activity	Target & Unit	Target Completion Date	Date of Completion	Method of Verification	Expected Percentage Risk Reduction	QA/QC Quality
Fuels management – Pole clearing beyond PRC 4292	3,126 Poles brushed in LRA HFTD areas	Year-End 2023	Q4 2023	Annual post-work audit by internal staff	N/A - Risk Reduction % is not able to be calculated at this time.	N/A

Completion Assessment – 100% of vegetation management pruning and removal activities associated with annual inspections and correction work was field audited.

Incomplete Explanation – N/A

Initiative Activity	Target & Unit	Target Completion Date	Date of Completion	Method of Verification	Expected Percentage Risk Reduction	QA/QC Quality
Detailed Inspection – Distribution	829 circuit miles inspected	Year-End 2023	Q4 2023	Inspection records, billing, project closeout documentation, and field verification	N/A - Risk Reduction % is not able to be calculated at this time.	N/A

Completion Assessment – 100% of vegetation management pruning and removal activities associated with annual inspections and correction work was field audited.

Incomplete Explanation – N/A

Initiative Activity	Target & Unit	Target Completion Date	Date of Completion	Method of Verification	Expected Percentage Risk Reduction	QA/QC Quality
Detailed Inspection - Transmission	264 line miles inspected	Year-End 2023	Q4 2023	Inspection records, billing, project closeout documentation, and field verification	N/A - Risk Reduction % is not able to be calculated at this time.	N/A

Completion Assessment – 100% of vegetation management pruning and removal activities associated with annual inspections and correction work was field audited.

Incomplete Explanation – N/A

Initiative Activity	Target & Unit	Target Completion Date	Date of Completion	Method of Verification	Expected Percentage Risk Reduction	QA/QC Quality
Patrol Inspection - Distribution	1,027 circuit miles inspected	Year-End 2023	Q4 2023	Inspection records, billing, project closeout documentation, and field verification	N/A - Risk Reduction % is not able to be calculated at this time.	N/A

Completion Assessment – 100% of vegetation management pruning and removal activities associated with annual inspections and correction work was field audited.

Incomplete Explanation – N/A

Initiative Activity	Target & Unit	Target Completion Date	Date of Completion	Method of Verification	Expected Percentage Risk Reduction	QA/QC Quality
Patrol Inspection - Transmission	329 line miles inspected	Year-End 2023	Q4 2023	Inspection records, billing, project closeout documentation, and field verification	N/A - Risk Reduction % is not able to be calculated at this time.	N/A

Completion Assessment – 100% of vegetation management pruning and removal activities associated with annual inspections and correction work was field audited.

Incomplete Explanation – N/A

Initiative Activity	Target & Unit	Target Completion Date	Date of Completion	Method of Verification	Expected Percentage Risk Reduction	QA/QC Quality
QAQC - Post-Audits Distribution (Patrol)	1,027 line miles	Year-End 2023	Q4 2023	Mileage documentation and tracking	N/A - Risk Reduction % is not able to be calculated at this time.	N/A

Completion Assessment – 100% of vegetation management pruning and removal activities associated with annual inspections and correction work was field audited.

Incomplete Explanation – N/A

Initiative Activity	Target & Unit	Target Completion Date	Date of Completion	Method of Verification	Expected Percentage Risk Reduction	QA/QC Quality
Wildfire Cameras	2 Cameras	Year-End 2023	Q3 2023	Completed work orders	N/A - Risk Reduction % is not able to be calculated at this time.	N/A

Completion Assessment – Close out of work orders in Q3 of 2023 confirmed the installation of the 2 wildfire cameras.

Incomplete Explanation – N/A

Initiative Activity	Target & Unit	Target Completion Date	Date of Completion	Method of Verification	Expected Percentage Risk Reduction	QA/QC Quality
Smoke and Air Quality Sensors	20 Sensors	Year-End 2023	Q1 2023	Completed work orders	N/A - Risk Reduction % is not able to be calculated at this time.	N/A

Completion Assessment – Close out of work orders in Q1 of 2023 confirmed the installation of the 20 sensors.

Incomplete Explanation – N/A

Initiative Activity	Target & Unit	Target Completion Date	Date of Completion	Method of Verification	Expected Percentage Risk Reduction	QA/QC Quality
DFA	2 Devices	Year-End 2023	Q1 2023	QDR - Table 1	N/A - Risk Reduction % is not able to be calculated at this time.	N/A

Completion Assessment – Tracking through the 2023 Q1 California QDR confirmed the installation of the 2 DFA devices in Q1 of 2023.

Incomplete Explanation – N/A

Initiative Activity	Target & Unit	Target Completion Date	Date of Completion	Method of Verification	Expected Percentage Risk Reduction	QA/QC Quality
Weather Stations	12 Weather Stations	Year-End 2023	Q3 2023	Completed work orders, GIS Data Submission(s)	N/A - Risk Reduction % is not able to be calculated at this time.	N/A

Completion Assessment – Close of work orders in Q3 of 2023 confirmed the installation of the weather stations and were verified against GIS data provided for the 2023 Q3 California QDR submission.

Incomplete Explanation – N/A

Initiative Activity	Target & Unit	Target Completion Date	Date of Completion	Method of Verification	Expected Percentage Risk Reduction	QA/QC Quality
External collaboration and coordination	1 Functional Exercise (FE) 1 Table Top Exercise (TTX) 1 workshop	Year-End 2023	Q2 2023	After Action Report and Improvement Plan (AAR/IP)	N/A - Risk Reduction % is not able to be calculated at this time.	N/A

Completion Assessment – After Action Reports and Improvement Plans confirmed the completion of 1 functional exercise in Siskiyou County, 1 table top exercise focused on Siskiyou, Shasta, and Del Norte counties, and 1 workshop for the Siskiyou and Yreka counties.

Incomplete Explanation – N/A

Initiative Activity	Target & Unit	Target Completion Date	Date of Completion	Method of Verification	Expected Percentage Risk Reduction	QA/QC Quality
AFN resources on the website	1 additional language for the medical certificate	Year-End 2023	Q2 2023	Review of the website and backend logs	N/A - Risk Reduction % is not able to be calculated at this time.	N/A

Completion Assessment – Review of the website and backend logs confirmed that the medical certificate application is available in Spanish.

Incomplete Explanation – N/A

2. *Change Orders*

A complete listing of all change orders requested by the electrical corporation that were approved by Energy Safety. For each change order, the electrical corporation must include a description of the change requested, the date the electrical corporation requested the change order, and the date that Energy Safety approved the requested change order.

Pacific Power did not submit change orders in 2023.

3. *Cost Variance*

A list that includes the following information for each WMP initiative identified in the WMP:

Initiative ID	Initiative	Planned	Actual	Variance Description
		(\$ thousands)	(\$ thousands)	
AI-01	Transmission Patrol inspections	\$93	\$119	Pacific Power experienced increased costs due to an increase in the volume of planned inspections.
AI-02	Distribution Patrol Inspections	\$308	\$286	Within 10% of plan
AI-03	Transmission Detail Inspections	\$137	\$92	Pacific Power experienced increased efficiencies in work planning which led to more timely completion of planned inspections.
AI-04	Distribution Detail Inspections	\$203	\$182	Within 10% of plan
AI-05	Transmission Intrusive Pole Inspections	\$171	\$106	Costs were less than expected due to ongoing Wildfire Mitigation Plan (WMP) activities that replaced a substantial number of formally wood poles with new fiberglass & steel poles. Less pole-

Initiative ID	Initiative	Planned	Actual	Variance Description
		(\$ thousands)	(\$ thousands)	
				sounding, hole drilling inspections and excavation tests were required.
AI-06	Distribution Intrusive Pole Inspections	\$90	\$90	Within 10% of plan
AI-07	Enhanced (Infrared) Inspections in Transmission Lines	\$90	\$81	Within 10% of plan
AI-08	Enhanced (Infrared) Inspections in Distribution Lines	\$125	\$165	Pacific Power conducted an additional IR flight in 2022 that was invoiced in 2023 which was not included in the original scope of work.
AI-11	Substation Inspections	\$179	\$237	Pacific Power experienced increased costs due to additional time spent on substation inspections. The company is currently implementing a new mobility tool (Oracle Field Services) for substation inspections.
AI-12	Quality Assurance and Quality Control	\$36	\$32	Pacific Power experienced increased efficiencies in work planning which led to a timelier completion of planned inspections.
CO-01	Public Outreach and Education Awareness Program	\$90	\$110	Pacific Power did more outreach in 2023 than expected. There was an increase in postage costs due to the increase in letters being sent for customers without an email in the system. Outreach also included more Spanish translation.
EP-01	Emergency Preparedness Plan	\$50	\$256	Original projections did not include all related emergency management and meteorology personnel, future projections will account for the full team.
EP-02	External Collaboration and Coordination	\$30	\$9	Pacific Power had 2 events cancelled, resulting in reduced spend.
EP-03	Messaging - PSP Portal	\$110	\$95	Project milestones for the PSP portal shifted from 2023 to 2024, as described in section 1(b).
EP-05	Customer support in wildfire and PSPS emergencies	\$150	\$8	The program plan was to reach 44 pre-qualified customers for the free portable battery program, however there were only 7 eligible medical baseline customers.
GH-01	Line Rebuild - Covered conductor installation	\$83,313	\$93,736	Unit costs were higher than planned due to an increase in projects with expedited schedules. Pacific Power also experienced higher than anticipated permitting costs for 2023.
GH-04	Installation of system automation equipment	\$10,000	\$10,782	Within 10% of plan

Initiative ID	Initiative	Planned	Actual	Variance Description
		(\$ thousands)	(\$ thousands)	
GH-05	Expulsion fuse replacement	\$10,000	\$7,976	Pacific Power completed fewer units than anticipated (details provided in 1(d)) and some of the expulsion fuse replacements were funded by GH-01 for work occurring concurrently on the same pole.
GO-01	Equipment Settings to Reduce Wildfire Risk	\$200	\$389	Program projections are based on an annual average. For 2023, the patrols identified more work than was historically projected.
GO-02	Grid Response Procedures and Notifications (Grid Ops): Patrols	\$600	\$197	Spend for this initiative was not as much as originally expected due to no PSPS events in 2023.
MA-01	Equipment Maintenance and Repair	\$245	\$323	Pacific Power utilized a new contractor for 2023. Projections were based on 2022 actual costs with the previous contractor.
PS-01	Protocols on PSPS	\$850	\$0	Pacific Power did not have any PSPS events in 2023.
RA-01	Risk and Risk Components Calculation	\$130	\$213	The spend for initiative RA-02 and RA-03 was included in spend for this initiative. Pacific Power also required additional resources for this work that was not originally projected for.
RA-02	Top Risk Areas within the HFRA	\$45	\$4	The work break down structure for this work was originally planned to be separate from RA-01 however it was captured in RA-02.
RA-03	Other Key Metrics	\$50	\$0	The work break down structure for this work was originally planned to be separate from RA-01 however it was captured in RA-02.
RA-04	Enterprise System for Risk Assessment	\$104	\$9	Resource limitations led to reduced spend for this initiative.
SA-01	Environmental monitoring systems	\$240	\$442	Pacific Power installed weather stations above the plan. The actual spend will be reallocated from California to Washington in 2024. Pacific Power will not seek recovery of these costs in California.
SA-02	Grid monitoring systems	\$39	\$114	The actual costs for this initiative includes entire programs spend and work done outside of California. Costs for work done outside of California will be reallocated accordingly in 2024.
SA-03	Smoke and Air Quality Sensors	\$70	\$50	The planned spend for this initiative included a partial payment that occurred and cleared at the end of 2022 and did not post to 2023 actuals.
SA-04	Ignition Detection Systems	\$320	\$335	Within 10% of plan
SA-05	Weather Forecasting	\$120	\$361	The original forecast was for a limited scope and the domain expansion costs

Initiative ID	Initiative	Planned	Actual	Variance Description
		(\$ thousands)	(\$ thousands)	
				were not included in Pacific Power's original forecast.
SA-06	Fire potential index	\$98	\$99	Within 10% of plan
VM-01	Detailed Inspection – Distribution	\$280	\$344	Pacific Power experienced an increase in vegetation management costs and planned costs were based on previous year spend. Pacific Power also brought in additional inspection resources on a temporary basis for 2023 which were at a higher cost.
VM-02	Detailed Inspection - Transmission	\$70	\$83	Pacific Power saw an increase in the number of flights and waypoints for transmission inspections. Additionally, the Company had a higher number of transmission projects completed in 2023 than expected.
VM-03	Patrol Inspection - Distribution	\$375	\$355	Within 10% of plan
VM-04	Patrol Inspection - Transmission	\$120	\$68	The lower costs resulted from a larger reliance on internal resources and did not require the originally planned external costs.
VM-05	Pole clearing	\$374	\$575	The planned pole clearing work required additional resources to achieve objectives. In order to accomplish the work, the additional resources had to work longer overtime hours.
VM-06	Clearance - Distribution	\$15,915	\$15,506	Within 10% of plan
VM-07	Clearance - Transmission	\$1,405	\$1,885	The increase in costs was due to an increase the volume of work due to additional flights and inspections that occurred. Additionally, vegetation management worked more clearing projects than anticipated.
VM-08	Fall-in mitigation	\$500	\$501	Within 10% of plan
VM-11	Quality assurance / quality control	\$135	\$146	Within 10% of plan
WP-01	Wildfire Mitigation Strategy Development	\$500	\$818	The costs for independent evaluation was not included in Pacific Power's original forecast for this initiative.
WP-02	Identifying and Evaluating Mitigation Initiatives	\$100	\$428	The grant study and a drone pilot program was not originally forecasted for this initiative at the beginning of the year.
	Total	\$128,060	\$137,607	Within 10% of plan

CONCLUSION

PacifiCorp's WMP efforts continue to evolve, both through internal learning and additional guidance received from the Office of Energy Safety Infrastructure, the California Public Utilities Commission, other California utilities, stakeholders, and our customers. The Company has made great progress in implementing the objectives of its 2023-2025 WMP and continues to evaluate and refine programs and measures to ensure that it is taking actions that will reduce wildfire risk without imposing unnecessary costs and burdens on customers.