

May 13, 2024

VIA ELECTRONIC FILING

Docket # 2023 NOV

May 13, 2024

Patrick Doherty
Program Manager
Compliance Assurance Division
Office of Energy Infrastructure Safety
715 P Street, 20th Floor
Sacramento, CA 95814

RE: PacifiCorp's Response to Notice of Violation – NOV_PC_CAC16_20230801_102

Dear Patrick Doherty:

PacifiCorp provides the following response to the finding(s) identified in the “Notice of Violation NOV_PC_CAC16_20230801_102” (Notice of Violation or NOV) issued by the Office of Energy Infrastructure Safety (Energy Safety) on April 12, 2024. On August 1, 2023, Energy Safety conducted an inspection of PacifiCorp's WMP initiatives in the vicinity of the city of Yreka, California. The inspection report is enclosed herewith. Energy Safety found the following violations:

Energy Safety found the following violations:

Violation 1. Energy Safety observed that in implementing WMP initiative number 8.2.3.1.2 – Pole Clearing, PacifiCorp failed to adhere to a required protocol of pole clearing to achieve required clearance at pole ID 06245007260105 at coordinates 41.715462644451, -122.632570788839. Energy Safety considers this violation for failure to adhere to protocol to be in the Minor risk category.

PacifiCorp Response:

PacifiCorp records show that the pole was cleared and treated with herbicide on March 7, 2023, and again the following year on March 14, 2024. In response to the notice of violation, the company conducted a field inspection on April 16, 2024, and current pole conditions are clear. There are no additional corrective actions planned and work will be conducted annually in accordance with PacifiCorp's Wildfire Mitigation Plan. Please see below an image of the pole from a field inspection on April 16, 2024.



Violation 2. Energy Safety observed that in implementing WMP initiative number 8.2.3.1.2 – Pole Clearing, PacifiCorp failed to adhere to a required protocol of pole clearing to achieve required clearance at pole ID 06245007263000 at coordinates 41.71374976, -122.62534223. Energy Safety considers this violation for failure to adhere to protocol to be in the Minor risk category.

PacifiCorp Response:

PacifiCorp records show that the pole was cleared on March 7, 2023, and again the following year on March 14, 2024. No herbicide is allowed on this pole due to it being on tribal land. In response to the notice of violation, the company conducted a field inspection on April 16, 2024, and show some re-growth of grass and weeds present after the pole was cleared on March 14, 2024. Due to no herbicide approval, the pole may require another potential visit before fire season. There are no additional corrective actions planned and work will be conducted annually in accordance with PacifiCorp's Wildfire Mitigation Plan. Please see below an image of the pole from a field inspection on April 16, 2024.



PacifiCorp appreciates the opportunity to provide this response to Energy Safety's NOV_PC_CAC16_20230801_102. Please refer any questions to Pooja Kishore, Regulatory Affairs Manager at 503-813-7314 or californiadockets@pacificorp.com.

Sincerely,

A handwritten signature in black ink that reads "Allen Berreth". The signature is written in a cursive, flowing style.

Allen Berreth
Vice President of Transmission & Distribution Operations
PacifiCorp
825 NE Multnomah Street, Suite 2000
Portland, OR 97232