



June 10, 2024

Allen Berreth
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PacifiCorp
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NOTICE OF VIOLATION

Mr. Berreth:

Pursuant to Public Utilities Code section 326 and Government Code section 15475.1, the Office of Energy Infrastructure Safety (Energy Safety) has conducted an inspection of work completed by PacifiCorp in accordance with its 2023 Wildfire Mitigation Plan (WMP) and determined the existence of one or more violations. Energy Safety therefore issues PacifiCorp a Notice of Violation (NOV), identifying noncompliance with an approved WMP or any law, regulation, or guideline within the authority of the Office.¹

On May 8, 2024, Energy Safety conducted an inspection of PacifiCorp's WMP initiatives in the vicinity of the city of Mount Shasta, California. The inspection report is enclosed herewith. Energy Safety found the following violation(s):

Violation 1. Energy Safety observed that in implementing 2023 WMP initiative 8.1.2.12 - Expulsion Fuse Replacements, PacifiCorp failed to provide accurate data in reporting that expulsion fuses were replaced on pole ID 15/48 at coordinates 41.3038341007191, -122.320791319897. Energy Safety considers this data accuracy violation to be in the Minor risk category.

Violation 2. Energy Safety observed that in implementing 2023 WMP initiative 8.1.2.12 - Expulsion Fuse Replacements, PacifiCorp failed to complete Expulsion Fuse Replacement on pole ID 06240004.220600 at coordinates 41.299622298582, -122.305498392864. Energy Safety considers this completeness violation to be in the Moderate risk category.

¹ Cal. Code Regs., tit. 14, section 29302(b)(2)

Response Options

Energy Safety may prescribe a timeframe for resolution of a violation associated with the assigned risk category.² Within 30 days from the issuance date of this NOV, the electrical corporation must provide a response advising Energy Safety of corrective actions taken or planned to remedy the above identified violation(s) and prevent recurrence. Alternatively, the electrical corporation must advise Energy Safety that it will not correct the violation, including the reasoning or justification for inaction and all supporting documentation.³

This response shall be filed in the Energy Safety e-Filing system under the 2023 NOV Docket⁴ and the associated file name(s) must begin with the NOV identification number provided above.

Pursuant to Government Code section 15475.4, if the electrical corporation intends to request a hearing “to take public comment or present additional information,” it must also do so within the 30-day timeframe. If a petition for hearing is not received by the deadline, then the determination and conditions set forth in this NOV become final.

Prior to its response or request for hearing, the electrical corporation may also request an informal conference with Energy Safety’s Compliance Assurance Division for the purpose of disputing any issues raised in this NOV no later than five (5) business days before the response deadline.⁵ Requests for informal conference with Energy Safety must be e-mailed to compliance@energysafety.ca.gov, with a copy sent to all Energy Safety Compliance Assurance Division staff identified in the NOV.

Pursuant to Public Utilities Code section 8389(g), following receipt of the electrical corporation’s response to this NOV and resolution of any disputes, this matter may be referred to the California Public Utilities Commission for its consideration of potential enforcement action, as it deems appropriate.

Sincerely,



Patrick Doherty

Program Manager | Compliance Assurance Division

Office of Energy Infrastructure Safety

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Cc:

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² Energy Safety Compliance Guidelines, pp. 5-6

³ Energy Safety Compliance Guidelines, pp. 6-7

⁴ <https://efiling.energysafety.ca.gov/EFiling/DocketInformation.aspx?docketnumber=2023%20NOV>

⁵ Energy Safety Compliance Guidelines, p. 6

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INSPECTION REPORT

Overview

Inspection Categories

The Office of Energy Infrastructure Safety (Energy Safety) conducts inspections to verify the work performed by an electrical corporation as reported in an approved Wildfire Mitigation Plan (WMP) or subsequent filing, and to assess general conditions of electrical infrastructure that may adversely impact an electrical corporation’s wildfire risk.

A Notice of Violation (NOV) is issued for any instances of noncompliance discovered during an inspection related to an electrical corporation’s execution of its WMP initiatives.

Correction Timelines

Violations must be corrected in a timely manner. Energy Safety may prescribe a timeframe for resolution of a violation. If Energy Safety assigns a risk category to a violation, an electrical corporation must correct the violation as required per the timelines provided in Table 1.⁶

Table 1. Risk Category and Correction Timelines

| Risk Category | Violation and defect correction timeline |
|---------------|---|
| Severe | <ul style="list-style-type: none">• Immediate resolution |
| Moderate | <ul style="list-style-type: none">• 2 months (in High Fire Threat District (HFTD) Tier 3)• 6 months (in HFTD Tier 2)• 6 months (if relevant to worker safety; not in HFTD Tier 3) |
| Minor | <ul style="list-style-type: none">• 12 months or resolution scheduled in WMP update |

⁶ Energy Safety Compliance Guidelines, p. 5



Inspection Summary

Table 2 provides a summary of the selection of the WMP inspection location and initiative. Table 3 provides a summary of the violation(s) found during the inspection. Details regarding the inspection that identified the violation(s) are provided in the Inspections Details Section below.

Table 2: Inspection Location and Initiative Summary

| | |
|---|--|
| Electrical Corporation: | PacifiCorp |
| Report Number: | PC_YLO_20240508_1002 |
| Inspector: | Yana Loginova |
| WMP Year Inspected: | 2023 |
| Quarterly Data Report (QDR) Referenced: | Quarter 4 (Q4) |
| Inspection Selection: | Energy Safety viewed the contents of the Q4 QDR and performed an analysis that resulted in the selection of the WMP initiatives and locations referenced in this report. |
| Relevant WMP Initiative(s): | Expulsion Fuse Replacements (2023 WMP initiative number 8.1.2.12) |
| Date of inspection: | May 8, 2024 |
| City and/or County of Inspection: | Mount Shasta, Siskiyou County |
| Inspection Purpose: | Assess the accuracy of PacifiCorp’s QDR data, completeness of its work, compliance with WMP requirements, and compliance with its protocols. |

Table 3: WMP Inspection Violation(s)

| Violation # | Structure ID | Lat/Long | HFT D | Initiative Number | Violation Type | Severity | Violation Description |
|--------------------|---------------------|---|------------------|---|---------------------------|-----------------|---|
| Violation 1 | 15/48 | 41.3038341007191, - 122.320791319897 | Tier 2 | 8.1.2.12 - Expulsion Fuse Replacements | Data Accuracy | Minor | Inaccurate data provided on Expulsion Fuse Replacement |
| Violation 2 | 06240004.220600 | 41.299622298582, - 122.305498392864 | Tier 2 | 8.1.2.12 - Expulsion Fuse Replacements | Completeness | Moderate | Failure to replace Expulsion Fuse |

Inspection Details

Violation 1:

Relevant Requirement:

PacifiCorp's WMP states the following regarding initiative number 8.1.2.12 - Expulsion Fuse Replacements on poles:

1. "This is a project to install new and CAL FIRE-approved non expulsion fuses including power fuses and current limiting fuses to replace existing expulsion fuse equipment with planned end date in 2024."⁷

Version 3.1 of Energy Safety's Data Guidelines states the following with respect to data submitted by an electrical corporation when reporting on its 2023 WMP initiatives:

1. "Electrical corporations must ensure location accuracy in their [geographic information system] data submissions..."⁸

Finding:

Energy Safety arrived at the provided pole ID 15/48 at 500 S Old Stage Rd, Mount Shasta, CA, 96067, USA, 41.3038341007191, -122.320791319897 and observed that the pole did not have fuses installed where Expulsion Fuse Replacement was reported as completed. The inspector's observation is documented in Violation 1 photographs, which are attachments to this report. Photo number Item3IA1Img1 depicts no fuses on the pole.

Energy Safety concludes that Violation 1 is Minor because of these facts:

1. The reported location provided by PacificCorp indicated that work on the Expulsion Fuse Replacements initiative (8.1.2.12) was reported as completed.
2. No fuses were observed on the indicated pole.

⁷ PacifiCorp, "2023-2025 Wildfire Mitigation Plan," Feb. 22, 2024. p. 145 [Online]. Available: <https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56336&shareable=true>

⁸ Office of Energy Infrastructure Safety, "Data Guidelines, Version 3.1," Feb. 17, 2023, p. 10 [Online]. Available: <https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53475&shareable=true>

Violation 2:

Relevant Requirement:

PacifiCorp's WMP states the following regarding initiative number 8.1.2.12 - Expulsion Fuse Replacements on poles:

1. "This is a project to install new and CAL FIRE-approved non expulsion fuses including power fuses and current limiting fuses to replace existing expulsion fuse equipment with planned end date in 2024."⁹

Finding:

On pole ID 06240004.220600 at 101-299 Bear Springs Rd, Mount Shasta, CA, 96067, USA, 41.299622298582, - 122.305498392864, the inspector observed that three Cal Fire exempt fuses were installed, but a fourth fuse was missing entirely. The inspector's observation is documented in Violation 2 photographs, which are attachments to this report. Photo numbers Item8IA3Img1, and Item8IA3Img2 depict three Cal-Fire exempt fuses present and one missing fuse.

Energy Safety concludes that Violation 2 is Moderate because of these facts:

1. The reported location provided by PacificCorp indicated that work on the Expulsion Fuse Replacements initiative (8.1.2.12) was reported as completed.
2. Energy Safety observed one missing fuse on the pole.



⁹ PacifiCorp, "2023-2025 Wildfire Mitigation Plan," Feb. 22, 2024. p. 145 [Online]. Available: <https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56336&shareable=true>

Exhibits

Exhibit A: Photo Log

Structure ID: 15/48

Violation 1

| | |
|--|---|
|  |  |
| <p>Item3GImg1: Pole ID</p> | <p>Item3GImg2: Overall Pole</p> |



Item3IA1mg1: No fuse installed

Structure ID: 06240004.220600

Violation 2



Item8GImg2: Overall Pole



Item8GImg1: Pole ID



Item8IA3Img1: Missing one out of four expulsion fuses



Item8IA3Img2: Missing fuse