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Re: CA 2025-WMPs  
OEIS-P-WMP\_2024-PC-01

Please find enclosed PacifiCorp's responses to OEIS data requests 1.1-1.4

## OEIS Data Request 1.1

**PacifiCorp’s Forecast Completion Dates for Vegetation Management QA/QC (VM-11):** In its 2025 WMP Update, PacifiCorp reports an updated forecasted completion date to “Create SME process & procedure for VM database review” and “Develop audits to provide understanding of the data collection process” (Initiative ID VM-11). The completion date changed from December 2025 to “deferred due to GeoDigital database upgrade”.

- (a) Is the GeoDigital database the same “VM database” PacifiCorp references in Initiative ID VM-11?
  - i. If not, provide a brief description of the GeoDigital database and the VM database referenced in Initiative ID VM-11 and clarify the relationship between them.
- (b) When is the update to the GeoDigital database expected to be completed?
- (c) Provide a specific updated forecasted completion date (e.g., Q2 2025) for Initiative ID VM-11 or justification for the completion date remaining unknown.

## Response to OEIS Data Request 1.1

- (a) No.
  - i. The vegetation management (VM) database originally identified refers to the database or work management tool that PacifiCorp is currently using. Subject matter expert (SME) review of this database was intended to focus on data integrity. PacifiCorp is working with a vendor (GeoDigital) to develop and implement a new work management system. As such, how data is collected and managed will change.
- (b) Development of the GeoDigital work management tool is anticipated to be completed and rolled out in Q1 2025.
- (c) At this time, the process for SME review of data collected within the GeoDigital work management tool is unknown. PacifiCorp will need to gain experience using the new tool to identify opportunities for improving data integrity and then develop a process to review data collected to minimize error. Completion of Initiative ID VM-11 is dependent on GeoDigital implementation and gaining user experience; therefore, the forecasted completion date is Q4 2025.

## OEIS Data Request 1.2

**PacifiCorp’s Pole Clearing Expenditure Changes (VM-05):** In its 2025 WMP Update, PacifiCorp includes a 60 percent increase in its 2025 projected expenditure for pole clearing (VM-05) with the explanation, “the increase in the cost is based on actual expenditures being higher than forecasted to perform pole clearing on a similar number of units”.

- (a) Explain how PacifiCorp forecasts expenditure for its pole clearing initiative.
- (b) Explain what factors in the historical spend data caused the forecasted expenditure for 2025 to increase (e.g., include in your explanation information on increased cost of labor, new regulation/law, etc.).

## Response to OEIS Data Request 1.2

- (a) PacifiCorp forecasts costs based on actuals experienced applied to the anticipated number of units (poles) to be worked.
- (b) The primary factor that influenced forecasted expenditures for initiative VM-05 is cost of labor. Regarding the increase in forecasted expenditure for 2025, the original 2025 expenditure estimate was an estimate based on 2022 experience and was not updated to reflect more recent experience and actuals. Updated information will be provided in the Q2 2024 Quarterly Data Report (QDR) submittal.

### **OEIS Data Request 1.3**

**PacifiCorp’s Vegetation Clearance – Transmission Expenditure Changes (VM-07):**

In its 2025 WMP Update, PacifiCorp includes a 61 percent increase in its 2025 projected expenditure for vegetation clearance - transmission (VM-07) with the explanation “the inclusion of the HFRA areas described in the risk model updates, the costs are forecasted to increase”. However, the addition of the HFRA results in a nearly 35 percent increase in transmission circuit miles.

- (a) Explain how PacifiCorp forecasts expenditure for its Vegetation Clearance – Transmission initiative.
- (b) Explain how a 35 percent increase in number of circuit miles for this initiative translates to a 61 percent expenditure increase (e.g., include in your explanation information on deferred maintenance on newly scoped circuit miles, one-time cost for expanding clearances in newly scoped circuit miles, etc.).

### **Response to OEIS Data Request 1.3**

- (a) PacifiCorp forecasts costs based on actuals of the previous year applied to the forecasted number of units (miles) to be worked as part of maintenance actions plus specific estimates for transmission right-of-way (ROW) clearing and treatment projects.
- (b) If a portion of a line is within the high fire threat district (HFTD), PacifiCorp treats the entire line as though it is within HFTD as part of this initiative. Therefore, line miles outside of the HFTD are included in this initiative, which impacts forecasted expenditures.

**OEIS Data Request 1.4**

**PacifiCorp’s expansion of vegetation patrol inspections to the entire territory, including the newly defined HFRA:** In Table 3 of its 2025 WMP Update, PacifiCorp indicates 120 transmission line miles and 488 distribution lines miles are included in the newly defined HFRA. PacifiCorp’s 2023-2025 Base WMP redline indicates that patrol inspections (VM-03 and VM-04) will occur in the newly defined HFRA and in the non-HFTD/HFRA. However, the narrative discussion describes conducting patrol inspections only on the portion of the lines within the HFTD. Furthermore, 2025 end of year circuit mile targets are unchanged.

- (a) Clarify whether patrol inspections (VM-03 and VM-04) will occur in the HFRA and/or the non-HFTD/HFRA in 2025.
  - i. If patrol inspections will occur beyond the HFTD in 2025, explain why 2025 end-of-year targets for VM-03 and VM-04 are unchanged.
  - ii. If patrol inspections will occur beyond the HFTD in 2025, explain why expenditures related to patrol inspections are unchanged.
  - iii. If patrol inspections will not occur beyond the HFTD in 2025, clarify the information provided in the unnamed table found on pp. 137-141 of PacifiCorp’s updated 2023-2025 WMP.

(b) Populate the empty cells of the table below:

<b>Initiative</b>	<b>2025 Target (Circuit Miles)</b>	<b>Circuit Miles of 2025 Target in HFTD</b>	<b>Circuit Miles of 2025 Target in HFRA</b>	<b>Circuit Miles of 2025 Target in Non-HFTD/HFRA</b>
<b>Patrol Inspections – Distribution (VM-03)</b>	922			
<b>Patrol Inspections – Transmission (VM- 04)</b>	329			

**Response to OEIS Data Request 1.4**

- (a) Patrol inspections in 2025 will take place in high fire threat districts (HFTD), high fire risk areas (HFRA), and non-HFTD/HFRA. PacifiCorp treats a circuit that may only have a portion of the line within a HFTD or HFRA as though the entire line is

Despite PacifiCorp's diligent efforts, certain information protected from disclosure by the attorney-client privilege or other applicable privileges or law may have been included in its responses to these data requests. PacifiCorp did not intend to waive any applicable privileges or rights by the inadvertent disclosure of protected information, and PacifiCorp reserves its right to request the return or destruction of any privileged or protected materials that may have been inadvertently disclosed. Please inform PacifiCorp immediately if you become aware of any inadvertently disclosed information.

within a HFTD or HFRA (electrically connected concept).

- i. PacifiCorp will provide updated targets in the Q2 2024 Quarterly Data Report (QDR) submittal. Targets were not updated with HFRA totals.
- ii. Updated forecasted expenditures will be provided in the Q2 2024 QDR submittal. Forecasted expenditures were not flagged in the 2025 Wildfire Mitigation Plan (WMP) update as the change in forecasted expenditure did not meet the 20 percent change threshold for reporting. Also, as described in PacifiCorp’s 2025 WMP, if a portion of a distribution line is within a HFTD, the entire distribution line is treated as though it is in a HFTD and inspected under initiative VM-03. Therefore, line miles beyond HFTDs were included in the forecasted expenditures.
- iii. Patrol inspections are currently planned to occur beyond HFTDs in 2025. In addition, tree work conducted as a result of patrol inspections that occur in HFRA’s, will be targeted for post audit as part of initiative VM-11.

(b) NOTE: Targets provided in the Company’s Wildfire Mitigation Plan were not finalized and will be updated in PacifiCorp’s Q2 2024 QDR submittal. Please refer to the below table, which is provided for reference:

Initiative	2025 Target (Circuit Miles)	Circuit Miles of 2025 Target in HFTD	Circuit Miles of 2025 Target in HFRA	Circuit Miles of 2025 Target in Non-HFTD/HFRA
Patrol Inspections – Distribution (VM-03)	1,182	676	161	346
Patrol Inspections – Transmission (VM04)	417	299	6	111