

Count	Party Name	DR Set #	Data Request	Question No.	Question ID	Question	Responses	Requestor	Date Received	Due Date	Date Sent	Link	Number of Attachments	Attachment Name	NDA Required	WMP Section	Category	Subcategory
1	Cal Advocates	2025WMP-01	2023-2025 WMP	1	Cal Advocates 1.1	For PacifiCorp's three-wire uni-grounded primary circuits at or below 35 kV (nominal) please describe, with references to PacifiCorp's procedures: (a) PacifiCorp's fast-trip line-current thresholds; (b) How PacifiCorp's fast-trip line-current thresholds are calculated from measured circuit values; (c) The intentional delays assigned to those line-current thresholds; (d) PacifiCorp's fast-trip ground-current thresholds; (e) How PacifiCorp's fast-trip ground-current thresholds are calculated from measured circuit values; (f) The intentional delays assigned to those ground-current thresholds; and (g) How the current (both line and ground) and delay thresholds differ from regular (non-fast-trip) settings.	(a)The answer below is taken from PacifiCorp Engineering Handbook 2D.1-Distribution Relay Setting Guide. Please refer to the Company's response to CalAdvocates 1.6, specifically Attachment CalAdvocates 1.6 which provides a copy of the PacifiCorp Engineering Handbook 2D.1. 6.3. EFR Settings Phase EFR Settings Phase pickup shall be set as follows: No higher than 50% of the minimum 3LG fault current seen by the relay for a fault at the end of line or at the end of the longest overreaching zone of protection. For the circuit depicted in Figure 3, point C would be considered as the end of the line and points D and B would define the overreaching zones. The relay at the circuit breaker must be set with reference to faults at points B, C and D. When possible, this element should accommodate twice the maximum load seen by the relay to provide security against cold load pickup. Maximum load is based on the five-year projected summer peak load. Care must be exercised to insure critical FHCA zones are covered when facing unique load- and/or fuse-limiting situations including automatic transfer. Must be equal or lower than normal mode pickup. (b)The answer below is taken from PacifiCorp Engineering Handbook 2D.1-	Tyler Holzschuh Franky Lao Joseph Lam Marybelle Ang	7/10/2024	7/15/2024	7/15/2024	N/A		N/A	N/A	N/A		
2	Cal Advocates	2025WMP-01	2023-2025 WMP	2	Cal Advocates 1.2	For PacifiCorp's four-wire multi-grounded primary circuits at or below 35 kV please describe, with references to PacifiCorp's procedures: (a) PacifiCorp's fast-trip line-current thresholds; (b) How PacifiCorp's fast-trip line-current thresholds are calculated from measured circuit values; (c) The intentional delays assigned to those line-current thresholds; (d) PacifiCorp's fast-trip ground-current thresholds; (e) How PacifiCorp's fast-trip ground-current thresholds are calculated from measured circuit values; (f) The intentional delays assigned to those ground-current thresholds; and (g) How the current and delay thresholds differ from non fast-trip settings.	Please refer to the Company's response to CalAdvocates Data Request 1.1.	Tyler Holzschuh Franky Lao Joseph Lam Marybelle Ang	7/10/2024	7/15/2024	7/15/2024	N/A		N/A	N/A	N/A		
3	Cal Advocates	2025WMP-01	2023-2025 WMP	3	Cal Advocates 1.3	For PacifiCorp's circuits above 35 kV, but not classified as part of the NERC bulk electric system, please describe, with references to PacifiCorp's procedures: (a) PacifiCorp's fast-trip line-current thresholds; (b) How PacifiCorp's fast-trip line-current thresholds are calculated from measured circuit values; (c) The intentional delays assigned to those line-current thresholds; (d) PacifiCorp's fast-trip ground-current thresholds; (e) How PacifiCorp's fast-trip ground-current thresholds are calculated from measured circuit values; (f) The intentional delays assigned to those ground-current thresholds; and (g) How the current and delay thresholds differ from non fast-trip settings.	The Company does not employ any kind of fast-trip settings on our transmission and sub-transmission system.	Tyler Holzschuh Franky Lao Joseph Lam Marybelle Ang	7/10/2024	7/15/2024	7/15/2024	N/A		N/A	N/A	N/A		
4	Cal Advocates	2025WMP-01	2023-2025 WMP	4	Cal Advocates 1.4	For PacifiCorp's circuits above 35 kV and classified as part of the NERC bulk electric system please describe, with references to PacifiCorp's procedures: (a) PacifiCorp's fast-trip line-current thresholds; (b) How PacifiCorp's fast-trip line-current thresholds are calculated from measured circuit values; (c) The intentional delays assigned to those line-current thresholds; (d) PacifiCorp's fast-trip ground-current thresholds; (e) How PacifiCorp's fast-trip ground-current thresholds are calculated from measured circuit values; (f) The intentional delays assigned to those ground-current thresholds; and (g) How the current and delay thresholds differ from non fast-trip settings.	The Company does not employ any kind of fast-trip settings on our transmission and sub-transmission system.	Tyler Holzschuh Franky Lao Joseph Lam Marybelle Ang	7/10/2024	7/15/2024	7/15/2024	N/A		N/A	N/A	N/A		
5	Cal Advocates	2025WMP-01	2023-2025 WMP	5	Cal Advocates 1.5	For protective devices that protect circuit segments that are partly or completely in HFTDs and are not part of the NERC bulk electric system, please provide the following information: (a) The number of substation circuit breakers that have only electromechanical relays; (b) The number of substation circuit breakers that have microprocessor relays; (c) The number of substation circuit breakers that have relays that can have their settings changed remotely; (d) The number of reclosers that are electromechanically based; (e) The number of reclosers that are microprocessor based; and (f) The number of reclosers which can have their settings changed remotely.	(a)There are 27 substation circuit breakers that have only electromechanical relays. (b)There are 97 substation circuit breakers that have microprocessor relays. (c)There are 14 substation circuit breakers that have relays that can have their settings changed remotely. (d)There is one recloser that is electromechanically based. (e)There are 82 reclosers that are microprocessor based. (f)There are no reclosers which can have their settings changed remotely.	Tyler Holzschuh Franky Lao Joseph Lam Marybelle Ang	7/10/2024	7/15/2024	7/15/2024	N/A		N/A	N/A	N/A		
6	Cal Advocates	2025WMP-01	2023-2025 WMP	6	Cal Advocates 1.6	Please provide all PacifiCorp procedures that govern the settings of fast trip and when they are enabled in California.	The following procedures govern the settings of fast trip and when they are enabled in California: Distribution Relay Setting Guide 2D.1 – Governs the protection requirements for fast trip settings. Policy PAC-1000 – Outlines the cross-departmental approach to monitoring meteorological and fuel conditions that adjust the daily operations of transmission and distribution assets during periods of elevated wildfire risk. This policy provides information regarding when fast trip settings are enabled during periods of elevated fire risk in California. Please refer to Attachment CalAdvocates 1.6 which provides a copy of the above referenced policies.	Tyler Holzschuh Franky Lao Joseph Lam Marybelle Ang	7/10/2024	7/15/2024	7/15/2024	N/A	1	Attach CalAdvocates 1.6	N/A	N/A	N/A	

7	Cal Advocates	2025WMP-02	2023-2025 WMP	1	Cal Advocates 2.1	Please provide PacifiCorp's procedures relating to the activation of a PSPS Emergency Coordination Center (as referred to in PacifiCorp's WMP at 340).	As described in PacifiCorp's Wildfire Mitigation Plan (WMP), a meteorology "District-Level Wildfire Risk Matrix" will be issued to internal stakeholders that indicates weather that may meet public safety power thresholds. This will initiate activation of an emergency coordination center (ECC) to coordinate all internal activities, communication with local public safety partners, and implementation of field monitoring activities. Upon agreement by executive management to initiate public safety power shutoff (PSPS) actions, the ECC staff will then prepare a PSPS plan consistent with the guidelines established by the California Public Utility Commission, which at a minimum shall include: <ul style="list-style-type: none"> •Forecasted date and time that the de-energization event will start. •Estimated duration of the event. •Date and time that affected customers will be notified under a proposed customer notification plan. •Critical infrastructure on affected circuit(s) such as hospitals, emergency centers, and water/water treatment plants that will be impacted. •With respect to each circuit or portion of a circuit planned for de-energization, a description of the circumstances that give rise to the need to de-energize with specific focus on how it creates an "imminent and significant risk to persons and/or property". •A description of measures considered as an alternative to de-energization and why 	Tyler Holzschuh Franky Lao Joseph Lam Marybelle Ang	7/10/2024	7/15/2024	7/15/2024	N/A	9	9.1	9.1.6
8	Cal Advocates	2025WMP-02	2023-2025 WMP	2	Cal Advocates 2.2	Please provide PacifiCorp's procedures relating to the activation of a PSPS event.	Please refer to the Company's response to CalAdvocates Data Request 2.1 which provides PacifiCorp's procedures relating to the activation of a public safety power shutoff (PSPS) emergency coordination center (ECC) which is the central coordination point for managing PSPS events.	Tyler Holzschuh Franky Lao Joseph Lam Marybelle Ang	7/10/2024	7/15/2024	7/15/2024	N/A	9	9.1	9.1.6
9	Cal Advocates	2025WMP-02	2023-2025 WMP	3	Cal Advocates 2.3	In 2021, PacifiCorp stated that it had roughly 28 medical baseline customers that live in a power de-energization zone (PDZ). (a) Please provide the definition of power de-energization zone. (b) Provide the current numbers of medical baseline customers and medical baseline customer accounts located in a power de-energization zone. (c) Please state in detail what PacifiCorp has done to ensure PacifiCorp has correct contact information (including, at a minimum, phone numbers and email addresses) for these customers.	(a)As of PacifiCorp's 2023 California Wildfire Mitigation Plan (WMP), PacifiCorp no longer utilizes proactive de-energization zones (PDZ). Prior to 2023, a proactive de-energization zone was identified as an area of highest risk for public safety power shutoff (PSPS). (b)As of July 5, 2024, PacifiCorp has 86 medical baseline customers in its California service territory. (c)PacifiCorp's medical baseline customers must recertify for the program annually, and the recertification process requires confirmation of contact information. PacifiCorp's customer services department sends a renewal letter to the customer in advance of the renewal date. In addition, for a medical certification account, the Company will attempt to reach out to the customer each month if they are in arrears in order to offer payment arrangements to the customer, and this process typically also facilitates an update of contact information which is no longer accurate.	Tyler Holzschuh Franky Lao Joseph Lam Marybelle Ang	7/10/2024	7/15/2024	7/15/2024	N/A	N/A	N/A	N/A
10	Cal Advocates	2025WMP-03	2023-2025 WMP	1	Cal Advocates 3.1	Table 8-13, Vegetation Management Implementation Objectives (3-year plan), indicates a "Deferred" status for the first two objectives listed. Please clarify the meaning of "Deferred" in the context of this WMP.	Completion of the two objectives listed as "deferred" are tied to PacifiCorp's ongoing vegetation management work management software project. PacifiCorp is currently working with a vendor to change its work management software. As such, developing a process to review the database and audits of the data collection process (data inputs) is premature as the work management software and functionality is still in development. PacifiCorp will revisit these objectives after the work management software development and implementation is completed.	Tyler Holzschuh Franky Lao Joseph Lam Marybelle Ang	7/18/2024	7/23/2024	7/23/2024		8 Wildfire Mitigations	Section 8.2 VEGETATION MANAGEMENT AND INSPECTIONS	: 8.2.1 Overview
11	Cal Advocates	2025WMP-03	2023-2025 WMP	2	Cal Advocates 3.2	Table 8-16, Vegetation Inspections and QAQC Targets by Year, contains uneven targets for 2023-2025. Please explain and justify the following: a) Detailed Inspection – Transmission targets increase from 264 line miles in 2023 to 602 line miles in 2024 (a 128% increase year over year) and go back down to 270 line miles in 2025. b) Patrol Inspection – Distribution targets indicate no progress between the end of Q3 and end of year targets for 2023 and 2024. c) Patrol Inspection – Distribution targets decreased from 1,027 circuit miles in 2023 to 865 circuit miles in 2024. This is a 162-mile (15%) decrease. d) Patrol Inspection – Transmission targets do not indicate any progress between end of Q3 and end of year targets for 2023 and 2025. e) Patrol Inspection – Transmission targets do not indicate any progress for 2024 quarterly targets. f) Patrol Inspection – Transmission targets for 2024 decrease to 99 line miles from the 329 line miles targeted in 2023. This is a 230-mile (69.9%) difference.	At the time Table 8-16 of PacifiCorp's 2025 Wildfire Mitigation Plan (WMP) Update was developed, PacifiCorp did not have its multi-year plan that included a finalized 2025 target. PacifiCorp was also revisiting high fire risk area (HFRA) boundaries and the potential impacts to the targeted miles associated with vegetation management WMP initiatives were not fully developed, resulting in fluctuation, generally a decrease, from 2023 to 2024. (a)Additionally, targets may fluctuate based on the transmission work schedule. Generally, a portion of all transmission lines are scheduled for detailed inspection in any given year and therefore the line miles scheduled may change from one year to the next. (b)The data in Table 8-16 in the 2025 WMP Update regarding the Patrol Inspection – Distribution initiative reflects PacifiCorp's plan for implementation. PacifiCorp targeted (in 2023) and is targeting (in 2024) completion of all planned patrol inspection-distribution line miles by the end of Q3 2024. Therefore, there would be no increase in Q4 2024, as the patrol inspections are planned to be completed in Q3 2024. (c)Please refer to the Company's response to CalAdvocates 3.2 subpart (a) above regarding availability of the multi-year plan, which impacted availability of data at the time Table 8-16 was developed for the 2025 WMP Update. (d)Please refer to the Company's response to subpart (b) above. (e)PacifiCorp targeted completion of all patrol inspection planned miles by the end of 2024.	Tyler Holzschuh Franky Lao Joseph Lam Marybelle Ang	7/18/2024	7/23/2024	7/23/2024		8 Wildfire Mitigations	Section 8.2 VEGETATION MANAGEMENT AND INSPECTIONS	: 8.2.1 Overview

12	Cal Advocates	2025WMP-03	2023-2025 WMP	3	Cal Advocates 3.3	PacifiCorp did not provide any data in relation to performance metrics for table 8-17 in this WMP Update. According to PacifiCorp's response to question 3 of a previous data request "CalAdvocates-PacifiCorp-2023WMP-10", this was due to miscommunication and a lapse in the data gathering process. a) Please provide an updated table 8-17. b) Provide an update on the efforts PacifiCorp has taken to develop control processes to ensure this data is captured and consistent in the future.	The Company assumes that the reference to "question 3 of a previous data request "CalAdvocates-PacifiCorp-2023WMP-10" is intended to be a reference to the Company's response to CalAdvocates Data Request 10.3 dated June 15, 2023. Based on the foregoing assumption, the Company responds as follows: (a) Please refer to the table provided below: Performance Metrics20202021202220232024 Projected2025 ProjectedMethod of Verification (e.g., third-party evaluation, QDR) Vegetation caused ignitions000000QDR Vegetation caused outages99147120221138138QDR (b)The Company utilizes manual reporting of information from the Quarterly Data Reports (QDR) and is looking into formulating an internal procedure to verify consistency.	Tyler Holzschuh Franky Lao Joseph Lam Marybelle Ang	7/18/2024	7/23/2024	7/23/2024			8 Wildfire Mitigations	Section 8.2 VEGETATION MANAGEMENT AND INSPECTIONS	: 8.2.1 Overview
13	Cal Advocates	2025WMP-03	2023-2025 WMP	4	Cal Advocates 3.4	For Table 8-19, Vegetation Management QA/QC Program: a) Please justify why a 10% sample size for Pole Clearing is a sufficient sample size for the purpose of QA/QC. b) What is PacifiCorp's procedural response to programs that do not meet the yearly target pass rate?	(a)Typically, 10 percent is the minimum sample size per circuit for a pole clearing audit. Poles cleared are also reviewed during post audit of annual corrective work for distribution identified during patrol inspections (target 100 percent post audit) and the Company is working on a process to record these reviews during other post audit activities. (b)PacifiCorp reviews audit findings with vegetation contractors during the normal course of business to identify opportunities for improvement. PacifiCorp also has developed key performance indicators, which includes number of audit findings, and reviews these with the vegetation management contractors typically on a quarterly basis.	Tyler Holzschuh Franky Lao Joseph Lam Marybelle Ang	7/18/2024	7/23/2024	7/23/2024			8 Wildfire Mitigations	Section 8.2 VEGETATION MANAGEMENT AND INSPECTIONS	8.2.5 Quality Assurance and Quality Control
14	Cal Advocates	2025WMP-03	2023-2025 WMP	5	Cal Advocates 3.5	PacifiCorp did not provide any data in relation to Table 8-20, Number of Past Due Vegetation Management Work Orders Categorized by Age. a) How does PacifiCorp determine priority of Vegetation Management Work Orders without established, specific due dates for each condition? b) Please provide a status update on the development of specific due dates for each condition found in vegetation inspections. c) Please provide an estimated timeline of when PacifiCorp intends to complete and implement the specific past-due dates.	(a)Currently, if imminent conditions are identified, they are addressed as soon as possible to mitigate the condition. Generally, PacifiCorp manages work at the circuit level. In other words, circuits are sequenced or scheduled within the calendar year based on factors such as environmental conditions and the last time the circuits were worked while considering presence of high fire threat district (HFTD). (b)PacifiCorp is currently reviewing the capabilities of work prioritization within the new work management software and processes that are being developed. Work prioritization capabilities of the new system are not fully understood at this time; however, work prioritization is part of the process review and development discussions. (c)Please refer to the Company's response to subpart (b) above. PacifiCorp is reviewing the feasibility of work prioritization.	Tyler Holzschuh Franky Lao Joseph Lam Marybelle Ang	7/18/2024	7/23/2024	7/23/2024			8 Wildfire Mitigations	Section 8.2 VEGETATION MANAGEMENT AND INSPECTIONS	8.2.6 Open Work Orders
15	Cal Advocates	2025WMP-03	2023-2025 WMP	6	Cal Advocates 3.6	Please provide PacifiCorp's Vegetation Management and Inspection manuals.	Please refer to Attachment CalAdvocates 3.6 which provides a copy of PacifiCorp's Transmission and Distribution Vegetation Management Program Standard Operating Procedures (SOP).	Tyler Holzschuh Franky Lao Joseph Lam Marybelle Ang	7/18/2024	7/23/2024	7/23/2024	1	Attach CalAdvocates 3.6	8 Wildfire Mitigations	Section 8.2 VEGETATION MANAGEMENT AND INSPECTIONS	N/A
16	Cal Advocates	2025WMP-03	2023-2025 WMP	7	Cal Advocates 3.7	Please provide the most recent version of PacifiCorp's Procedure 069 and state the date when it was most recently revised or updated.	Please refer to Attachment CalAdvocates 3.7 which provides a copy of PacifiCorp's Procedure 069, last updated on May 24, 2024.	Tyler Holzschuh Franky Lao Joseph Lam Marybelle Ang	7/18/2024	7/23/2024	7/23/2024	1	Attach CalAdvocates 3.7	8 Wildfire Mitigations	8.1 GRID DESIGNS, OPERATIONS, AND MAINTENANCE	8.1.5 Asset Management and Inspection Enterprise System(s)
17	Cal Advocates	2025WMP-03	2023-2025 WMP	8	Cal Advocates 3.8	In response to Cal Advocates' data request CalAdvocates-PacifiCorp-2023WMP-16, PacifiCorp provided Policy 192 R7. If the document has been updated since then, please provide an updated version of Procedure 192.	The Company assumes that the reference to "data request CalAdvocates-PacifiCorp-2023WMP-16" is intended to be a reference to the Company's response to CalAdvocates Data Request 16.1 dated June 20, 2023. Based on the foregoing assumption, the Company responds as follows: Please refer to Attachment CalAdvocates 3.8 which provides a copy of PacifiCorp's Asset Management Policy 192 that was last updated on May 20, 2024.	Tyler Holzschuh Franky Lao Joseph Lam Marybelle Ang	7/18/2024	7/23/2024	7/23/2024	1	Attach CalAdvocates 3.8	8 Wildfire Mitigations	8.1 GRID DESIGNS, OPERATIONS, AND MAINTENANCE	8.1.5 Asset Management and Inspection Enterprise System(s)
18	Cal Advocates	2025WMP-03	2023-2025 WMP	9	Cal Advocates 3.9	PacifiCorp states the following in its2025 WMP update on p. 180: "In response to PC 23-12, in 2024, to update the imminent threat condition code, procedures were developed to be able to capture the imminent threat conditions at the time of identification along with entering the data into the official system of record, Facility Point Inspection (FPI). All policies and procedures have been updated and training materials are currently being updated to reflect new policies. Starting in 2025, all level 1 conditions will be tracked separately from priority A conditions." a) Please provide the procedures PacifiCorp has developed to capture the imminent threat conditions. b) Please explain why level 1 conditions will be tracked separately from priority A conditions. c) Please specify how PacifiCorp will differentiate A priority conditions that are "imminent" from "non-imminent" threat conditions.	(a)PacifiCorp created a new priority code for imminent threat conditions. The new priority code is referenced as I-priority. This new priority code is in addition to PacifiCorp's traditional A/B/C priority codes. Prior to this change, imminent threat conditions were recorded and documented as A-priorities, which captured both imminent threat conditions and other high-risk conditions that were not deemed an imminent threat. PacifiCorp's Asset Management policy 192 was updated to reflect the new priority code, the Facility Point Inspection (FPI) system along with inspection mobile tools were modified such that inspectors can record the new priority code. PacifiCorp's Procedure 069 was also modified to include descriptions, along with example photos of imminent threat conditions. Inspection training materials are also being updated to reflect the new priority code. (b)PacifiCorp separated Level 1 conditions from "A" priorities because not all "A" priorities are considered an imminent threat. Level 1 priorities will be documented as "I" priorities. Level 2 priorities will be documented as either "A" or "B" priorities. PacifiCorp will continue the use of "A" and "B" priorities for the intent of correcting some Level 2 conditions sooner than others. Please refer to PacifiCorp's Asset Management Policy 192 for more details; a copy of which is provided with the Company's response to CalAdvocates Data Request 3.8. (c)In accordance with the updated PacifiCorp Asset Management Policy 192, imminent threat will be differentiated from "A" priorities as follows: •Priority I – Conditions where there's an imminent threat to safety or reliability with a high probability of significant impact. "I" priorities align with General Order (GO) 95	Tyler Holzschuh Franky Lao Joseph Lam Marybelle Ang	7/18/2024	7/23/2024	7/23/2024			8 Wildfire Mitigations	8.1 GRID DESIGNS, OPERATIONS, AND MAINTENANCE	8.1.6 Quality Assurance and Quality Control

19	Cal Advocates	2025WMP-03	2023-2025 WMP	10	Cal Advocates 3.10	PacifiCorp states in its 2025 WMP update on p. 180 that it experiences delays in remediation due to: access, materials, permitting, and resource constraints. a) What specific actions and procedural changes has PacifiCorp implemented to mitigate the delays listed above? b) For each action or procedural change, how has PacifiCorp measured and validated the resulting impact (i.e. the action reduced type of delay by n days)?	(a)PacifiCorp continues to accelerate condition correction and has implemented parallel path processes to ensure one step (i.e. permitting or environmental review) does not hold up material ordering, estimating, and resourcing. There are some items (steel poles for example) that continue to have long lead times that the Company is unable to accelerate. (b)PacifiCorp does not track the impact for each specific delay because of the dynamic nature of condition correction. For example, the Company may order additional crossarms anticipating an increase in replacements only to be held up by excessive snow in an area or unanticipated access issues from a landowner. In general, PacifiCorp continues to correct thousands of conditions on time and continuously evaluates procedures for additional areas of improvement.	Tyler Holzschuh Franky Lao Joseph Lam Marybelle Ang	7/18/2024	7/23/2024	7/23/2024	8 Wildfire Mitigations	8.1 GRID DESIGNS, OPERATIONS, AND MAINTENANCE	8.1.6 Quality Assurance and Quality Control	
20	Cal Advocates	2025WMP-03	2023-2025 WMP	11	Cal Advocates 3.11	a) Between 2020 to 2023, did PacifiCorp conduct any temporary corrective actions or interim measures to decrease the severity of imminent threat conditions? b) If yes to the above question, please provide a list of the individual asset maintenance tags and the corrective actions taken to decrease the imminent threat condition for 2020 to 2023.	(a)PacifiCorp strives to decrease the frequency and severity of imminent threat conditions by aiming to correct all Level 2 conditions within appropriate correction timeframes. Generally, unaddressed Level 2 conditions may eventually become Level 1 priorities. To decrease the severity and impact of imminent threats, the company has used an "A" and "B" priority system to subdivide Level 2 conditions. The Company attempts to correct "A" priority conditions within 30-days, which reduces the frequency and severity of imminent threat conditions. Furthermore, the Company attempts to correct "B" priority conditions in either six or 12 months, depending on whether a condition is located in the high fire threat district (HFTD) and whether the condition poses an energy release risk. Correction of "B" priority conditions further reduces the frequency and severity of imminent threat conditions. (b)Conditions were either tagged with an "A" or "B" priority.	Tyler Holzschuh Franky Lao Joseph Lam Marybelle Ang	7/18/2024	7/23/2024	7/23/2024	8 Wildfire Mitigations	8.1 GRID DESIGNS, OPERATIONS, AND MAINTENANCE	8.1.3 Asset Inspections	
21	Cal Advocates	2025WMP-03	2023-2025 WMP	12	Cal Advocates 3.12	For Table 8-7, Grid Design and Maintenance QA/QC Program: a) Please explain why a 5% Contractor sample size for Detailed Inspections is a sufficient sample size for the purpose of QA/QC. b) Please explain why a 3% Company sample size for Detailed Inspections is a sufficient sample size for the purpose of QA/QC. c) Please clarify/justify why a 5% Contractor sample size for Intrusive Inspections is a sufficient sample size for the purpose of QA/QC. d) Please clarify/justify why a 3% Company sample size for Intrusive Inspections is a sufficient sample size for the purpose of QA/QC. e) What is PacifiCorp's procedural response to programs that do not meet the yearly target pass rate?	(a)Please refer to the Company's response to subpart (d) below. (b)Please refer to the Company's response to subpart (d) below. (c)Please refer to the Company's response to subpart (d) below. (d)PacifiCorp uses a 3 percent and 5 percent inspection audit sample size for inspections performed by the Company and contractors, respectively. These sample sizes are used for both detailed and intrusive inspections. Based on PacifiCorp's experience, these sample sizes have adequately represented the quality of inspections performed. Furthermore, the Company continues to achieve a high pass rate during its audits. If the Company was not achieving a high pass rate, it would consider increasing the sample size. (e)If the Company fails to meet the yearly target rate, a review is performed to determine the reason and action is taken accordingly. Generally, experienced inspectors will have higher scores and inspectors achieving low scores is an indication that additional training or other actions may be required. If a specific inspector or area has a significantly low score, it may trigger the need for the area to be re-inspected.	Tyler Holzschuh Franky Lao Joseph Lam Marybelle Ang	7/18/2024	7/23/2024	7/23/2024	8 Wildfire Mitigations	8.1 GRID DESIGNS, OPERATIONS, AND MAINTENANCE	8.1.6 Quality Assurance and Quality Control	
22	Cal Advocates	2025WMP-04	2023-2025 WMP	1	Cal Advocates 4.1	According to PacifiCorp's "2025_WMP_Update_EFR_Outage_Summary_2023_Data.xlsx," the following circuits had 10 or more outages in 2023: • 5G83 • 6G25 • 5G79 • 5G21 • 4G1 For each of these circuits, please provide an explanation of the high frequency of outages.		Tyler Holzschuh Franky Lao Joseph Lam Marybelle Ang	7/19/2024	7/24/2024					
23	Cal Advocates	2025WMP-04	2023-2025 WMP	2	Cal Advocates 4.2	For the same circuits in question 1: • 5G83 • 6G25 • 5G79 • 5G21 • 4G1 For each circuit listed, identify the one protective device (e.g. recloser or substation circuit breaker) where the most Elevated Fire Risk (fast-trip) outages in 2023 occurred. Please provide, for those protective devices: a) An identifier for the protective device; b) The fast-trip ground current trip threshold, as of July 1, 2023; c) The fast-trip line current trip threshold, as of July 1, 2023; d) The maximum unfaulted ground current, from July 1, 2018 to July 1, 2023, or similar proxy value; and e) The maximum unfaulted line current, from July 1, 2018 to July 1, 2023, or similar proxy value.		Tyler Holzschuh Franky Lao Joseph Lam Marybelle Ang	7/19/2024	7/24/2024					
24	Cal Advocates	2025WMP-04	2023-2025 WMP	3	Cal Advocates 4.3	Please provide a list of all the inputs (e.g. historical wind, historical fires, etc) that you use to prioritize covered conductor installation, as well as a general explanation of how those factors are considered.	PacifiCorp prioritizes covered conductor installation based on Expected Risk scores (please refer to Appendix B: Supporting Documentation for Risk Methodology and Assessment in the 2023-2025 Wildfire Mitigation Plan (WMP) Update, for more information on risk scores). Prior to completing its risk modeling, the Company focused primarily on high fire threat district (HFTD) Tier 3 locations. Some higher priority circuits may be completed later than other projects due to issues associated with permitting, right-of-way (ROW), and/or constructability.	Tyler Holzschuh Franky Lao Joseph Lam Marybelle Ang	7/19/2024	7/24/2024	7/24/2024	Appendix B	N/A	N/A	

25	Cal Advocates	2025WMP-04	2023-2025 WMP	4	Cal Advocates 4.4	Please provide PacifiCorp's most recent "Emergency Response Plan" as mentioned in a meeting of Cal Advocates and PacifiCorp on July 17, 2024.	Please refer to Confidential Attachment CalAdvocates 4.4 which provides a copy of the following documents: •Emergency Response Plan 2024.fv (2) •ERP 2024, Annex 01 External Emergency Coordination and Communication.fv which form PacifiCorp's most recent "Emergency Response Plan". Confidential information will be provided to California Advocates pursuant to California Public Utilities Code § 583 and General Order (GO) 66-D. All other parties must execute a Non-Disclosure Agreement (NDA) to receive confidential information. Contact Pooja Kishore at (503) 813-7314 to obtain an NDA and access to the confidential information.	Tyler Holzschuh Franky Lao Joseph Lam Marybelle Ang	7/19/2024	7/24/2024	7/24/2024	1	Attach CalAdvocates 4.4 CONF	Y	N/A	N/A	N/A
26	Cal Advocates	2025WMP-05	2023-2025 WMP	1	Cal Advocates 5.1	Please provide a description of PacifiCorp's review process for EFR settings after an EFR outage. Please include at the minimum: (1) How long after an EFR outage the review takes place; and (2) Whether PacifiCorp checks if customer load caused the EFR settings to trip.		Tyler Holzschuh Franky Lao Joseph Lam Marybelle Ang	7/22/2024	7/25/2024							
27	Cal Advocates	2025WMP-05	2023-2025 WMP	2	Cal Advocates 5.2	For PacifiCorp's substation circuit breakers that operate at primary distribution voltages (less than 35 kV nominal) in California, please provide: a) The number of circuit breakers that have only electromechanical relays; and b) The percentage of circuit breakers that have only electromechanical relays.	(a)11. (b)14 percent.	Tyler Holzschuh Franky Lao Joseph Lam Marybelle Ang	7/22/2024	7/25/2024	7/25/2024				N/A	N/A	N/A
28	Cal Advocates	2025WMP-05	2023-2025 WMP	3	Cal Advocates 5.3	PacifiCorp's response to data request CalAdvocates-PacifiCorp-2025WMP-01 states that PacifiCorp ensures a minimum factor for EFR line-current thresholds of 2x of historical load in response to question 1, but states that this factor is 1.2x in its Distribution Relay Setting Guide at 9 as of August 17, 2023. Please state which factor (2x, 1.2x or other) between historical load and EFR line-current trip threshold PacifiCorp uses.	The Company assumes that the reference to "data request CalAdvocates-PacifiCorp-2025WMP-01" is intended to be a reference to the Company's response to CalAdvocates Data Request 1.1. Based on the foregoing assumption, the Company responds as follows: In elevated fire risk (EFR) settings, when possible, the phase current should accommodate 2x historical load but should not exceed the normal mode pickup as stated in the response. The factor of 1.2x on page 9 of the Distribution Relay Setting Guide refers to the upstream device temporary settings criteria if the automatic protective device in question is bypassed.	Tyler Holzschuh Franky Lao Joseph Lam Marybelle Ang	7/22/2024	7/25/2024	7/25/2024				N/A	N/A	N/A
29	OEIS	WMP_2024-PC-1	2023-2025 WMP	1	OEIS 1.1	Regarding 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." ¹ 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.	(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.	Jolynne Flores	7/19/2024	7/29/2024	7/29/2024				8 WILDFIRE MITIGATIONS	8.2 VEGETATION MANAGEMENT AND INSPECTIONS	8.2.1 Overview
30	OEIS	WMP_2024-PC-1	2023-2025 WMP	2	OEIS 1.2	Regarding 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) ² 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." ³ 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.).	(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.	Jolynne Flores	7/19/2024	7/29/2024	7/29/2024				8 WILDFIRE MITIGATIONS	8.2 VEGETATION MANAGEMENT AND INSPECTIONS	N/A
31	OEIS	WMP_2024-PC-1	2023-2025 WMP	3	OEIS 1.3	Regarding 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) ⁴ with the explanation "the inclusion of the HFRA areas described in the risk model updates, the costs are forecasted to increase." ⁵ However, the addition of the HFRA results in a nearly 35 percent increase in transmission circuit miles. ⁶ 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.).	(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.	Jolynne Flores	7/19/2024	7/29/2024	7/29/2024				8 WILDFIRE MITIGATIONS	8.2 VEGETATION MANAGEMENT AND INSPECTIONS	N/A

32	OEIS	WMP_2024-PC-1	2023-2025 WMP	4	OEIS 1.4	Regarding 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.7 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 .8 However, the narrative discussion describes conducting patrol inspections only on the portion of the lines within the HFTD.9 Furthermore, 2025 end of year circuit mile targets are unchanged.10 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:	(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 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: Initiative2025 Target (Circuit Miles)Circuit Miles of 2025 Target in HFTDCircuit Miles of 2025 Target in HFRAcircuit Miles of 2025 Target in Non-HFTD/HFRA	Jolynne Flores	7/19/2024	7/29/2024	7/29/2024			8 WILDFIRE MITIGATIONS	8.2 VEGETATION MANAGEMENT AND INSPECTIONS	N/A
33	OEIS	WMP_2024-PC-1	2023-2025 WMP	5	OEIS 1.5	Regarding initiative additions in the 2023-2025 Base WMP Redline: a. In the paragraph above the unnamed table on pp. 136-141 of its 2023-2025 Base WMP Redline, PacifiCorp states, "Additional mitigation measures have been added to the table to reflect the full suite of mitigations Pacific Power may consider."11 For each redlined initiative, indicate if the initiative is currently implemented, new, being considered, pilot, etc. i. If not yet implemented (e.g., new, being considered, pilot, etc.), provide: 1. A potential implementation date. 2. Why PacifiCorp added the potential initiative to the table at this time. b. If a redlined initiative if currently implemented, indicate why said initiative was not in PacifiCorp's 2023-2025 Base WMP. c. Under what allowable 2025 WMP Update is each redlined initiative in the table being updated?	(a)Please refer to Attachment OEIS 1.5 which provides a summary of the initiatives added and their status: i. Please refer to the Company's responses below: 1.GH-12, Microgrids: As discussed on page 161, the feasibility studies will be undertaken in 2024 and 2025. No implementation dates have been contemplated for initiatives not being done at this time. 2.Initiatives were added to the table in the interest of completeness and alignment with other filings such as the Quarterly Data Report (QDR). (b)As referenced in Attachment OEIS 1.5 at the applicable page, initiatives were in the 2023-2025 Base Wildfire Mitigation Plan (WMP), it was an oversight that they were omitted from the table. (c)None specifically identified. As noted in the Company's response to subpart (a) above, initiatives underway were included the 2023-2025 Base WMP, it was an oversight that they were omitted from the table. As discussed in the Company's response to subpart (a)(i)(2) above, initiatives not currently being done were added to the table in the interest of completeness and alignment with other filings such as the QDR.	Jolynne Flores	7/19/2024	7/24/2024	7/24/2024	1	Attach OEIS 1.5	7 Wildfire Mitigation Strategy Development	7.1 Risk Evaluation	7.1.4 Mitigation Selection Process
34	Cal Advocates	2025WMP-06	2023-2025 WMP	1	Cal Advocates 6.1	Please provide, for California: a) The predetermined weather/fuel thresholds that PacifiCorp uses to activate Public Safety Power Shutoff (PSPS) control rooms (Emergency Coordination Center or ECC); b) The predetermined weather/fuel thresholds that PacifiCorp uses to activate PSPSs; c) PacifiCorp's official procedures that reference the predetermined thresholds for ECC activation for PSPSs; and d) PacifiCorp's official procedures that reference the predetermined thresholds for PSPS activation.	PacifiCorp objects that the terms "predetermined weather/fuel thresholds" and "predetermined thresholds" are vague and ambiguous. Subject to this objection, PacifiCorp responds as follows: The concept of a threshold has different implications in different applications. PacifiCorp uses various numerical criteria when evaluating wildfire risks and the potential for a Public Safety Power Shutoff (PSPS), but PacifiCorp does not employ a "threshold" in terms of a particular criteria measurement acting as a definitive decision point. (a)Please refer to PacifiCorp's 1st Supplemental response to CalAdvocates Data Request 2.1 which provides the requested thresholds. (b)PacifiCorp's Public Safety Power Shutoff (PSPS) strategy involves the meteorology team predicting extreme wildfire potential and wind-related outage potential, then also identifying when extreme wildfire potential and wind-related outages coincide. Extreme wildfire potential generally correlates to when the United States (U.S.) Forest Service's Severe Fire Danger Index has reached the categories of Very High or Extreme. Additional fuels analysis is performed to identify if the fuels environment in the area of concern. Extreme wind-related outage potential generally correlates to when winds are forecast to reach the 99th percentile for a circuit or circuit segment as determined by comparing PacifiCorp's Weather Research Forecast (WRF) model predicted winds with a 30-year historical weather reanalysis created using the same WRF model. (c)Please refer to PacifiCorp's 1st Supplemental response in CalAdvocates Data Request 2.1 and its associated attachment for the official procedures.	Tyler Holzschuh Franky Lao Joseph Lam Marybelle Ang	26-Jul	31-Jul			8 WILDFIRE MITIGATIONS	8.3 SITUATIONAL AWARENESS AND FORECASTING	8.3.5 Weather Forecasting	
35	Cal Advocates	2025WMP-06	2023-2025 WMP	2	Cal Advocates 6.2	If PacifiCorp uses 95th and 99th percentile winds for PSPS ECC and PSPS activation: a) Please provide a map of these wind speeds. b) State whether the 95th and 99th percentiles that you use are based on sustained wind speeds, gust speeds, or a combination of both.	(a)PacifiCorp uses the forecast for 99th percentile wind gust derived from the Weather Research Forecast (WRF) 30-year historical reanalysis. PacifiCorp does not use the 95th percentile wind gust to determine the potential for a Public Safety Power Shutoff (PSPS). Please refer to Attachment CalAdvocates 6.2 which provides the 99th percentile wind gust climatology for California. (b)PacifiCorp's PSPS activation criteria are based on the 99th percentile for wind gusts.	Tyler Holzschuh Franky Lao Joseph Lam Marybelle Ang	26-Jul	31-Jul		1	Attach CalAdvocates 6.2	9 PUBLIC SAFETY POWER SHUTOFF	9.1 OVERVIEW	9.1.6 Protocols on PSPS
36	Cal Advocates	2025WMP-06	2023-2025 WMP	3	Cal Advocates 6.3	PacifiCorp's 2023 Q4 and 2024 Q1 quarterly reports do not contain actual spending for 2023 in Table 11. Please provide PacifiCorp's 2023 Q4 quarterly report, Table 11, with the actual spending information for 2023.	This Office of Energy Infrastructure Safety (OEIS) quarterly data report template for Q4 2023 or Q1 2024 did not include areas to provide the 2023 actual spending. The 2023 actual spending in Table 11 was provided as part of a supplemental filing requested by OEIS submitted to OEIS on March 1, 2024. Please refer to Attachment CalAdvocates 6.3.	Tyler Holzschuh Franky Lao Joseph Lam Marybelle Ang	26-Jul	31-Jul		1	Attach CalAdvocates 6.3	N/A	N/A	N/A

