



August 12, 2024
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Via Electronic Filing

Subject: Comments of the Public Advocates Office on PacifiCorp's 2025 Wildfire Mitigation Plan Update

Docket: 2023-2025-WMPs

Dear Director Thomas Jacobs,

The Public Advocates Office at the California Public Utilities Commission (Cal Advocates) respectfully submits the following comments on the 2025 Wildfire Mitigation Plan Update of PacifiCorp d/b/a Pacific Power (PacifiCorp). Please contact Nathaniel Skinner (Nathaniel.Skinner@cpuc.ca.gov) or Henry Burton (Henry.Burton@cpuc.ca.gov) with any questions relating to these comments.

We respectfully urge the Office of Energy Infrastructure Safety to adopt the recommendations discussed herein.

Sincerely yours,

/s/ **Joseph Lam**

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I. INTRODUCTION

The Public Advocates Office at the California Public Utilities Commission (Cal Advocates) submits these comments on the 2025 Wildfire Mitigation Plan (WMP) Updates submitted by investor-owned electric utilities (IOUs or utilities).¹ Cal Advocates submits these comments pursuant to the Office of Energy Infrastructure Safety’s (Energy Safety) *Revised 2023-2025 Wildfire Mitigation Plan Process and Evaluation Guidelines* (WMP Process Guidelines)² and the *Revised 2025 Wildfire Mitigation Plan Update Schedule*.³

The 2025 Wildfire Mitigation Plan Update Guidelines (2025 WMP Update Guidelines)⁴ establish substantive requirements for these WMP Update submissions, while the WMP Process Guidelines establish a schedule and review process for WMP submissions. Liberty Utilities (CalPeco Electric) LLC (Liberty) and PacifiCorp d/b/a Pacific Power (PacifiCorp) submitted 2025 WMP Updates on July 8, 2024.

The WMP Process Guidelines and the 2025 WMP Update schedule permit interested persons to file opening comments on the WMP Updates of Liberty and PacifiCorp by August 12, 2024, and reply comments by August 22, 2024. In these comments, Cal Advocates addresses PacifiCorp’s 2025 WMP Update.⁵ The table below highlights Cal Advocates’ recommendations to Energy Safety regarding PacifiCorp’s 2025 WMP Update and Cal Advocates’ recommended timeframes.

¹ Many of the Public Utilities Code requirements relating to wildfires apply to “electrical corporations.” See, e.g., Public Utilities Code Section 8386. These comments use the more common term “utilities” and the phrase “electrical corporations” interchangeably to refer to the entities that must comply with the wildfire safety provisions of the Public Utilities Code.

² Office of Energy Infrastructure Safety’s (Energy Safety), *Revised 2023-2025 Wildfire Mitigation Plan Process and Evaluation Guidelines*, January 31, 2024, in docket 2023-2025-WMPs.

See also Energy Safety, *Final 2023-2025 Wildfire Mitigation Plan Process and Evaluation Guidelines*, December 6, 2022.

³ Energy Safety, *Revised 2025 Wildfire Mitigation Plan Update Schedule*, February 22, 2024, in docket 2023-2025-WMPs. See also, Energy Safety, *2025 Wildfire Mitigation Plan Update Schedule*, January 26, 2024, in docket 2023-2025-WMPs.

⁴ Energy Safety, *2025 Wildfire Mitigation Plan Update Guidelines*, January 31, 2024, in docket 2023-2025-WMPs.

⁵ PacifiCorp, *2025 Wildfire Mitigation Plan Updates*, July 8, 2024 (2025 WMP Update).

II. TABLE OF RECOMMENDATIONS

Item	Recommendation	Timeframe	Section of these Comments
1	Energy Safety should require PacifiCorp to have predetermined Public Safety Power Shutoff thresholds.	2026-2028 WMP	III.A
2	PacifiCorp should assess its medical baseline (MBL) recertification frequency.	2026-2028 WMP	III.B
3	Energy Safety should require PacifiCorp to use historical or predicted customer load as the primary basis for fast-trip settings.	2026-2028 WMP	IV.A
4	Energy Safety should require PacifiCorp to explore fast-trip settings on sub-transmission.	2026-2028 WMP	IV.B
5	Energy Safety should require PacifiCorp to propose a timeline for its existing fast-trip settings review.	2026-2028 WMP	IV.C.
6	Energy Safety should require PacifiCorp to analyze ways to reduce covered conductor installation costs.	2026-2028 WMP	V.A
7	Energy Safety should require PacifiCorp to establish quality assurance and quality control procedures to ensure data is consistent in all of PacifiCorp's filings.	2026-2028 WMP	VI.A
8	Energy Safety should require PacifiCorp to establish a work prioritization for remediation of vegetation management work orders.	2026-2028 WMP	VII.A
9	Energy Safety should require PacifiCorp to establish performance metrics to track its progress on reducing delays in remediation of level 1 conditions.	2026-2028 WMP	VIII.A
10	Energy Safety should require PacifiCorp to provide a plan to use probability distribution for its risk model with milestones.	Revision Notice	IX.A

III. PUBLIC SAFETY POWER SHUTOFFS

A. Energy Safety should require PacifiCorp to establish predetermined Public Safety Power Shutoff thresholds.

PacifiCorp plans on using proactive de-energization (Public Safety Power Shutoffs or PSPS) to mitigate catastrophic wildfires.⁶ Unfortunately, de-energization events pose a serious safety issue to the public, especially for customers who depend on electricity for medical needs.⁷ Because prolonged power outages may have dire consequences, PacifiCorp should use PSPS only when dry winds pose a high probability of asset or vegetation damage.

In response to discovery, PacifiCorp did not provide any predetermined PSPS thresholds.⁸ Instead, PacifiCorp states that its meteorologists color-code its districts based on fire risk.⁹ If the meteorologists determine there is a fire risk, the meteorologist will meet with the emergency management team to determine if a PSPS Emergency Coordination Center (ECC) should be opened.¹⁰

PacifiCorp's lack of predetermined weather and fuel thresholds is problematic. Area for Continued Improvement (ACI) PC-23-03 requires PacifiCorp to analyze and report about the risk trade-off between wildfire and outage risk.¹¹ In order for PacifiCorp to know that it minimizes total risk for its PSPS program, it must know under what conditions it may de-energize lines. Therefore, PacifiCorp should develop predetermined weather and fuel thresholds for a potential PSPS activation to ensure proper analysis of the wildfire versus outage risk for its PSPS program.

⁶ See PacifiCorp's 2023-2025 WMP section 9.

⁷ The specific term of art at the California Public Utilities Commission is "medical baseline," which we will use here. Cal Advocates notes, however, that not all electricity-dependent medical customers may be on a medical baseline rate. <https://www.cpuc.ca.gov/consumer-support/financial-assistance-savings-and-discounts/medical-baseline>.

⁸ See PacifiCorp's response to data request CalAdvocates-PacifiCorp-2025WMP-02, question 1, July 15, 2024; PacifiCorp's response to data request CalAdvocates-PacifiCorp-2025WMP-06, question 1, July 31, 2024.

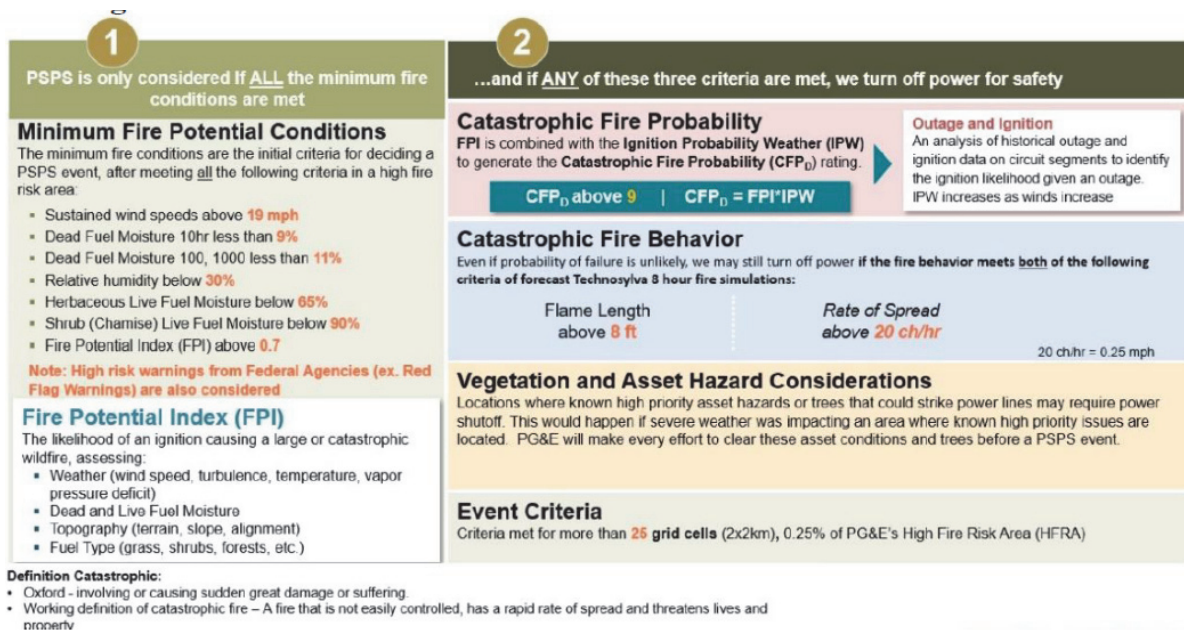
⁹ PacifiCorp's supplemental response to CalAdvocates-PacifiCorp-2025WMP-02, question 1, July 31, 2024.

¹⁰ PacifiCorp's supplemental response to CalAdvocates-PacifiCorp-2025WMP-02, question 1, July 31, 2024.

¹¹ Energy Safety, *Decision on PacifiCorp's 2023-2025 Wildfire Mitigation Plan*, February 12, 2024, at 81.

Both Southern California Edison Company (SCE) and Pacific Gas and Electric Company (PG&E) have numerical weather and fuel thresholds for activating PSPS events. PG&E notes that its “PSPS is only considered if ALL the minimum fire conditions are met.”¹² These conditions are shown in Figure 1 (PG&E’s PSPS Protocols for Distribution) below.

Figure 1: PG&E’s PSPS Protocols for Distribution¹³



SCE has its own similar, set of quantitative assessments that determine if a PSPS may be triggered.¹⁴

Quantitative assessments remove most of the subjective decision-making thresholds and allow cost-benefit analyses to be optimized. Energy Safety should require PacifiCorp’s 2026-2028 Base WMP to have clear, predetermined thresholds before a PSPS is considered. Energy Safety is correct to require PacifiCorp to perform a cost-benefit analysis for PSPS events, but this analysis cannot be done in a quantifiable way without predetermined PSPS thresholds.

¹² PG&E, *Public Safety Power Shutoff (PSPS) Report to the CPUC July 2 – 3, 2024 De-energization*, at 7.

¹³ PG&E, *Public Safety Power Shutoff (PSPS) Report to the CPUC July 2 – 3, 2024 De-energization*, at 7.

¹⁴ SCE, *Southern California Edison Company’s Public Safety Power Shutoff Post-Event Report For July 19, 2024*, at 9.

B. PacifiCorp should assess its medical baseline (MBL) recertification frequency.

As noted above, PSPS events pose a major public safety risk, especially for medical baseline customers. In order to execute PSPS events as safely as possible, medical baseline (MBL) customers must be given advance notice. PacifiCorp requires recertification for MBL status every year, which according to PacifiCorp effectively removes those who forget to re-register.¹⁵ This means that PacifiCorp’s list of MBL customers may not accurately reflect its actual population of medically-vulnerable customers.

PG&E has a recertification frequency of every four years, while SCE and SDG&E have a recertification frequency of every two years.¹⁶ If PacifiCorp moved to a longer frequency, it would likely develop a larger list of medically-vulnerable customers. If PacifiCorp has a larger—but still accurate—list of MBL customers, it will be able to notify more medically-vulnerable customers before a PSPS event in a timely manner. This advance notification could potentially save a life or avert medical treatment.

PacifiCorp should assess its MBL recertification frequency. Energy Safety should also require PacifiCorp to confirm contact information for its MBL customers. Having a larger and more accurate list of medically sensitive customers and their contact information will allow PacifiCorp to execute PSPS events more safely.

IV. FAST-TRIP SETTINGS

A. Energy Safety should require PacifiCorp to use historical or predicted customer load as the primary basis for fast-trip settings.

Fast-trip settings are one of the most cost-effective wildfire mitigation strategies.¹⁷ PG&E estimates that fast-trip settings prevent 68 percent of ignitions on fast-trip enabled

¹⁵ PacifiCorp’s response to data request CalAdvocates-PacifiCorp-2025WMP-02, question 3, July 15, 2024.

¹⁶ PG&E, *Medical Baseline Program Application—Part A*, January 2024, available at <https://www.pge.com/assets/pge/localized/en/docs/account/billing-and-assistance/medbaseline-application.pdf>; San Diego Gas & Electric Company (SDG&E), *Medical Baseline Allowance Application*, available at <https://www.sdge.com/sites/default/files/documents/MBL%20Renewal%20Form%20-%20Fillable.pdf>; Southern California Edison Company (SCE) *Medical Baseline Allowance Application*, available at <https://www.sce.com/sites/default/files/2019-07/14-746%20Medical%20Baseline%20Application%20Rev%201-19%20.pdf>.

¹⁷ Cody Warner, Duncan Callaway, and Meredith Fowlie, *Risk-Cost Tradeoffs in Power Sector Wildfire Prevention*, February 2024 at 19, available at <https://haas.berkeley.edu/wp-content/uploads/WP347.pdf>

circuits.¹⁸ Accordingly, fast-trip settings should be part of a robust wildfire mitigation strategy. However, effective as they are, fast-trip settings can have negative impacts on reliability. PacifiCorp had five fast-trip-enabled circuits with 10 or more outages in 2023.¹⁹ PacifiCorp must prioritize optimizing its fast-trip settings.²⁰

Protective device settings (including fast-trip settings) should be designed to de-energize the powerline only when there is a short-circuit (such as a tree falling on a line or two wires of different voltage or phase touching).²¹ Therefore, in normal operation (when only power from customer load is flowing through the powerlines) the protective device should not de-energize the powerline. At the same time, the protective devices should de-energize the powerline when there is a short circuit. In other words, the protective-device settings should be above the level of customer load but below the maximum current the grid can provide (called fault duty) at that point in the circuit.²²

Currently, PacifiCorp uses fault duty as the main basis for its fast-trip settings.²³ Then, PacifiCorp ensures that the fast-trip settings are at least twice the peak load from the last five years.²⁴ However, in order to minimize powerline ignitions with an even outage rate,²⁵ the reverse order is a better solution. That is, PacifiCorp should set its fast-trip settings at a factor

¹⁸ PG&E, *Powerline Safety Settings and Continued Focus on Tree Work Are Among the Ways that PG&E is Reducing the Risk of Ignitions and Wildfires*, August 7, 2023, available at: <https://www.pgecurrents.com/articles/3798-powerline-safety-settings-continued-focus-tree-work-ways-pg-e-reducing-risk-ignitions-wildfires>.

¹⁹ PacifiCorp, *2025_WMP_Update_EFR_Outage_Summary_2023_Data.xlsx*, July 8, 2024, Docket 2023-2025-WMPs.

²⁰ PacifiCorp refers to fast-trip settings as “Elevated Fire Risk settings.”

²¹ Protective devices are the devices on the power grid that protect people and equipment from hazardous short or open circuits (known as faults).

²² Protective device settings must be between customer load and fault duty. If the settings are below customer load, then customer load will cause the settings to de-energize the line, which is not acceptable. Similarly, if the settings are above the fault duty, then the devices will never trip, posing a significant safety issue.

²³ Fault duty is a term for the maximum electron flow (i.e. current) the power grid can provide at a given point on the grid. It is essential for determining protective device settings.

²⁴ PacifiCorp’s response to data request CalAdvocates-PacifiCorp-2025WMP-01, question 1, July 15, 2024.

²⁵ Each protective device will have a similar probability of de-energizing the circuit due to customer load if protective devices have a similar difference between peak customer load and its de-energization threshold.

1.5x or 2x from the historical or predicted load and then ensure that the fault duty is high enough so that the protective device can operate.

There are two reasons why PacifiCorp should use historical or predicted customer load as the primary fast-trip basis. First, SDG&E has used historical customer load as the primary basis for fast-trip settings with success. Despite 90 faults on fire-weather days since 2015, SDG&E has not had a single ignition on fast-trip-enabled circuits.²⁶ In addition, SDG&E has a much lower average duration for outages per customer²⁷ than utilities, such as PG&E, which use fault duty as its primary fast-trip basis.²⁸ Second, using fault duty as the main basis for fast-trip settings is flawed because fault duty is not accurately determined on distribution. Fault duty on distribution depends on impedance, which depends on the spacing of conductors.²⁹ Accurately measuring the spacing of conductors is necessary for accurate calculations, making calculated fault duty susceptible to inaccuracies. In contrast, customer load is directly measured at many protective devices, making it more suitable as a fast-trip basis.³⁰

Energy Safety should require PacifiCorp to use historical or predicted customer load as its primary basis for fast-trip settings. Furthermore, Energy Safety should require PacifiCorp to document this change in PacifiCorp's 2026-2028 base WMP. Basing fast-trip settings on customer load will reduce PacifiCorp's wildfire risk, while producing a more even outage rate on fast-trip-enabled circuits.

B. Energy Safety should require PacifiCorp to explore fast-trip settings on sub-transmission.

Although electric distribution has greater mileage and closer vegetation clearances than sub-transmission,³¹ electric sub-transmission nonetheless represents a significant wildfire

²⁶ SDG&E's 2023-2025 WMP at 234.

²⁷ Known as system average interruption duration index (SAIDI).

²⁸ PG&E's 2022 Electric Reliability Report and SDG&E's 2022 Electric Reliability Report, available at <https://www.cpuc.ca.gov/industries-and-topics/electrical-energy/infrastructure/electric-reliability/electric-system-reliability-annual-reports/2022-annual-electric-reliability-reports>.

²⁹ Impedance is the ratio of voltage to current; Seunghwa Lee, P.E., Joe Perez, P.E., *Guide to Transmission Line Constants Calculations*, available at: https://synchrogrid.com/wp-content/uploads/2021/10/Guide-to-Transmission-Line-Constants-Calculations_SynchroGrid.pdf.

³⁰ See PacifiCorp's supplemental response to data request CalAdvocates-PacifiCorp-2025WMP-05, question 1, August 1, 2024.

³¹ Sub-transmission here refers to the singly-fed powerlines that serve only customer load, but have a

threat.³² As previously stated, fast-trip settings represent a cost-effective way to prevent wildfires caused by powerlines.³³ PacifiCorp should explore fast-trip for its sub-transmission circuits.

PG&E already uses fast-trip settings on sub-transmission to prevent wildfires caused by those lines.³⁴ PacifiCorp should explore a similar expansion of fast-trip to its sub-transmission lines. Energy Safety should require PacifiCorp to explore fast-trip settings for its sub-transmission system and propose a use of fast-trip settings in its 2026-2028 Base WMP. Developing prudent fast-trip settings on sub-transmission is an opportunity to improve safety.

C. Energy Safety should require PacifiCorp to propose a timeline for its existing fast-trip settings review.

Although fast-trip settings are a cost-effective way to reduce wildfire risk, PacifiCorp has had major reliability issues.³⁵ To ensure no circuit has an unduly burdensome outage rate, PacifiCorp does outage reviews for fast-trip outages.³⁶ These outage reviews should allow PacifiCorp to determine potential causes of fast-trip outages. For example, PacifiCorp can determine if load has grown on a circuit such that PacifiCorp needs to modify its fast-trip settings. Moreover, if there are many unknown outages PacifiCorp can investigate if damaged insulators or if poor vegetation management are the causes of the outages. In 2023, PacifiCorp had five circuits with 10 or more fast-trip outages.³⁷ This level of outages represents an unduly burdensome impact on the PacifiCorp customers on these circuits.

A high level of outages also raises the possibility that PacifiCorp has not properly designed its protective settings for fire-weather days. For example, if PacifiCorp is incorrect

nominal voltage above 21 kV.

³² PacifiCorp, 2023-2025 WMP, July 8, 2024, at 35; California Public Utilities Commission, General Order 95, Table 1.

³³ Cody Warner, Duncan Callaway, and Meredith Fowlie, *Risk-Cost Tradeoffs in Power Sector Wildfire Prevention*, February 2024 at 19, available at <https://haas.berkeley.edu/wp-content/uploads/WP347.pdf>

³⁴ PG&E's 2023-2025 WMP R6 at 571.

³⁵ Cody Warner, Duncan Callaway, and Meredith Fowlie, *Risk-Cost Tradeoffs in Power Sector Wildfire Prevention*, February 2024 at 19, available at: <https://haas.berkeley.edu/wp-content/uploads/WP347.pdf>.

³⁶ PacifiCorp's response to data request CalAdvocates-PacifiCorp-2025WMP-05, question 1, August 1, 2024.

³⁷ PacifiCorp, *2025_WMP_Update_EFR_Outage_Summary_2023_Data.xlsx*, July 8, 2024, Docket 2023-2025-WMPs

about the predicted load at a protective device, the device might trip on customer load. In addition, high levels of outages may indicate a problem on the circuit (such as damaged insulators or poor vegetation management) and should be promptly investigated. However, PacifiCorp does not set a deadline for reviewing fast-trip settings.³⁸ The longer PacifiCorp waits to review settings, the greater the possibility of repeated outages.

Energy Safety should require PacifiCorp to establish a set time period for PacifiCorp's review of settings after every fast-trip outage as part of PacifiCorp's 2026-2028 base WMP. This will allow PacifiCorp time to assess its potential resource needs and provide stakeholders the opportunity to comment on PacifiCorp's recommendation. A timely settings review after every outage will allow PacifiCorp to ensure that there are not multiple outages due to customer load and will alert PacifiCorp to problematic circuits sooner.

V. SYSTEM HARDENING

A. Energy Safety should require PacifiCorp to analyze ways to reduce covered conductor installation costs.

Covered conductors are driving a significant increase in PacifiCorp's rates. PacifiCorp proposes to cover roughly 120 miles in 2025 and puts PacifiCorp on track to cover all of its high fire threat district (HFTD) distribution miles by roughly 2033.³⁹ PacifiCorp proposes to spend \$1 million per mile to install covered conductor in 2025.⁴⁰ Thus, covering all of PacifiCorp's 814 HFTD miles would cost in excess of \$800 million.⁴¹

In comparison, SCE spends roughly \$650,000 per mile on covered conductors.⁴² If PacifiCorp can match SCE's unit costs that would significantly reduce the financial impact of PacifiCorp's covered conductor program on its customers. In addition, PacifiCorp never states

³⁸ PacifiCorp's response to data request CalAdvocates-PacifiCorp-2025WMP-05, question 1, August 1, 2024.

³⁹ PacifiCorp's 2023-2025 WMP, July 8, 2024, at 150.

⁴⁰ PacifiCorp's 2024 Q1 Quarterly Report, Table 11. PacifiCorp's forecasted spending on covered conductor is a capital expenditure.

⁴¹ PacifiCorp's California revenue requirement is approximately \$100 million per year. See D.23-12-016 at 45; and PacifiCorp's 2023-2025 WMP, July 8, 2024, at 35.

⁴² SCE's 2024 Q1 Quarterly Report, Table 11 and SCE, *Wildfire Mitigation Activities Overview 2023 Year-End Progress Report*, available at: https://download.newsroom.edison.com/create_memory_file/?f_id=603e696eb3aed34c92db9f08&content_verified=True.

why its per miles costs are higher than SCE's per mile costs.⁴³ PacifiCorp's customers already face rates higher than the national average and covered-conductor costs will increase the costs paid by PacifiCorp's customers.⁴⁴

PacifiCorp should strive to lower its covered-conductor costs as much as possible. Energy Safety should direct PacifiCorp to analyze ways of improving the cost-efficiency of system hardening and to report on its progress as part of its 2026-2028 WMP submission. Energy Safety should also reiterate that approval of PacifiCorp's WMP does not represent approval of PacifiCorp's spending on covered conductors.

VI. DATA QUALITY

A. Energy Safety should require PacifiCorp to establish internal quality-assurance and quality-control procedures for its data collection and reporting.

In the absence of internal quality assurance (QA) and quality control (QC) procedures, PacifiCorp may produce inconsistent and incomplete filings. PacifiCorp submitted its 2023-2025 Base WMP with incomplete data.⁴⁵ PacifiCorp subsequently provided the requested data and explained that it did not provide this data initially, because of miscommunications and a lapse in the data-gathering process. PacifiCorp additionally stated that it was developing tools and processes to ensure data is consistent in all of PacifiCorp's filings by the third quarter of 2023.⁴⁶

In PacifiCorp's 2025 WMP update, Table 8-17 again had no reported values.⁴⁷ And again, PacifiCorp provided updated data upon request and again stated that it was formulating an internal procedure to verify consistency.⁴⁸ However, PacifiCorp's responses this year do not match the responses provided last year. The following table summarizes the responses to two

⁴³ See PacifiCorp's 2023-2025 WMP, July 8, 2024.

⁴⁴ See PacifiCorp Schedule No. D, Standard Residential Tariff; US Energy Information Administration, Electric Power Monthly: Table 5.6.A. Average Price of Electricity to Ultimate Customers by End-Use Sector, May 2024, https://www.eia.gov/electricity/monthly/epm_table_grapher.php?t=epmt_5_6_a; See PacifiCorp's 2023 WMP, July 8, 2024 at 156-158.

⁴⁵ For example, Table 8-17, "Vegetation Management and Inspection Performance Metric Results by Year," did not contain any data. See PacifiCorp's 2023-2025 WMP, at 185.

⁴⁶ PacifiCorp's response to CalAdvocates-PacifiCorp-2023WMP-10, question 3a, July 24, 2024.

⁴⁷ PacifiCorp's 2025 WMP Update at 208.

⁴⁸ PacifiCorp's response to CalAdvocates-PacifiCorp-2025WMP-03, question 3b, July 24, 2024.

different data requests issued during discovery for the 2023-2025 WMP and the 2025 WMP

Update:

Table 1: Summary of Vegetation Management and Inspection Performance Metrics							
	Metric	2020	2021	2022	2023	2024 projected	2025 projected
2023 Response	Vegetation- caused ignitions	5	4	3	5	5	5
2024 Response	Vegetation- caused ignitions	0	0	0	0	0	0
2024 Supplementary Response	Vegetation- caused ignitions	5	4	3	2	0	0
2023 Response	Vegetation- caused outages	90	140	135	138	138	138
2024 Response	Vegetation- caused outages	99	147	120	221	138	138
2024 Supplementary Response	Vegetation- caused outages	99	147	120	161	138	138

PacifiCorp’s initial response in 2024 adjusted the counts of vegetation-caused ignitions to zero for all years.⁴⁹ Additionally, the number of actual vegetation-caused outages experienced in 2023 was significantly higher than projected in PacifiCorp’s initial response.⁵⁰ Follow up discussions regarding the initial response resulted in PacifiCorp acknowledging that it had miscounted vegetation-caused outages and its “method of data gathering failed to capture all the historical ignitions in its initial response.”⁵¹ A supplementary response containing revised

⁴⁹ PacifiCorp’s response to CalAdvocates-PacifiCorp-2025WMP-03, question 3a, July 24, 2024.

⁵⁰ PacifiCorp’s response to CalAdvocates-PacifiCorp-2025WMP-03, question 3a, July 24, 2024; PacifiCorp’s response to CalAdvocates-PacifiCorp-2023WMP-10, question 3a, June 15, 2023.

⁵¹ Confirmation of data error causes received through electronic mail, August 1, 2024.

counts for Table 8-17 was provided after follow up discussions took place and are included in Table 1 above.⁵²

Reporting consistent and accurate data is important. Cal Advocates understands the possibility of making mistakes always exists; however, quality assurance and quality control procedures are necessary to limit errors. The discovery process can help to identify such mistakes but should not be considered a primary form of data verification.

As previously mentioned, PacifiCorp stated in 2023 that it intended to develop tools and processes to ensure data is consistent by the third quarter of 2023.⁵³ However, PacifiCorp does not appear to have achieved this target and is still formulating an internal procedure to verify consistency.⁵⁴

PacifiCorp continues to fall short of providing accurate and consistent data. Therefore, Energy Safety should require PacifiCorp to establish internal quality assurance and quality control procedures for its data collection and reporting. PacifiCorp should detail its new procedures, including the implementation timeframes and persons responsible, in its 2026-2028 WMP Base filing. A specific plan with actions and milestones is essential for tracking progress and understanding if adjustments are needed to meet a plan in a timely manner. Energy Safety should further require annual updates on PacifiCorp's progress in this regard.

VII. VEGETATION MANAGEMENT

A. **Energy Safety should require PacifiCorp to establish a work-prioritization system that includes specific due dates for each vegetation condition.**

In PacifiCorp's 2023-2025 Base WMP and 2025 WMP update, PacifiCorp failed to provide data on the number of past due work orders for vegetation management. PacifiCorp states that it did not have specific due dates for each condition at the time of filing.⁵⁵ Currently, PacifiCorp addresses imminent conditions as soon as possible. Other vegetation management

⁵² PacifiCorp's supplementary response to CalAdvocates-PacifiCorp-2025WMP-03, question 3, August 5, 2024.

⁵³ PacifiCorp's response to CalAdvocates-PacifiCorp-2023WMP-10, question 3a, June 15, 2023.

⁵⁴ PacifiCorp's response to CalAdvocates-PacifiCorp-2025WMP-03, question 3b, July 24, 2024.

⁵⁵ PacifiCorp's 2023-2025 WMP at 207; PacifiCorp's 2025 WMP Update at 230.

conditions are “scheduled within the calendar year based on factors such as environmental conditions and the last time the circuits were worked.”⁵⁶

PacifiCorp is currently “currently reviewing the capabilities of work prioritization within the new work management software and processes that are being developed,”⁵⁷ but PacifiCorp has not provided a timeline for development or implementation. Without a clearly defined system in place, PacifiCorp may be creating unnecessary risk. Vegetation conditions may arise that are not deemed imminent and would thus not be addressed in a timely manner (due to the last scheduled work being too recent).⁵⁸

A utility must understand the risks in its service territory so that it can determine the appropriate actions to remediate those risks in a timely fashion. It is imperative to have a system in place that clearly identifies what actions to take and when to take those actions. PacifiCorp’s lack of specific due dates for each vegetation condition unreasonably allows risks to persist.

Energy Safety should require PacifiCorp to establish a work-prioritization system that includes specific due dates for each vegetation condition. PacifiCorp should describe its proposed approach—including the implementation timeline—in its 2026-2028 Base WMP filing. Establishing a specific plan with milestones is important to confirm that a certain task is on track. Energy Safety should further require annual updates on PacifiCorp’s progress.

VIII. ASSET MANAGEMENT

A. **Energy Safety should require PacifiCorp to establish performance metrics and targets to measure progress on reducing delays in remediation of level 1 asset conditions.**

In 2023, Energy Safety required PacifiCorp to “describe the specific tools and/or process changes that will address each constraint (access, material, permitting, and resource),”⁵⁹ referring to the root causes of delay in level 1 condition remediations that PacifiCorp identified in its 2023-2025 Base WMP. PacifiCorp states that it has “moved its permitting process into a

⁵⁶ PacifiCorp’s response to CalAdvocates-PacifiCorp-2025WMP-03, question 5a, July 24, 2024.

⁵⁷ PacifiCorp’s response to CalAdvocates-PacifiCorp-2025WMP-03, question 5b, July 24, 2024.

⁵⁸ PacifiCorp Transmission & Distribution Vegetation Management Program Standard Operating Procedures at 29, August 19, 2019.

⁵⁹ Energy Safety’s Decision on PacifiCorp’s 2023-2025 WMP, at 86, February 12, 2024: Area for Continued Improvement (ACI) PC-23-13.

parallel path with job design”⁶⁰ in its efforts to address the identified causes for delays. However this response only addresses issues related to permitting; PacifiCorp provides no details regarding the other causes of delay.

PacifiCorp states it “does not track the impact for each specific delay.”⁶¹ PacifiCorp also has not clearly demonstrated any progress toward reducing delays in remediating level 1 asset conditions that it had itself identified.⁶² Level 1 priority conditions present immediate safety and reliability risks with a high probability for significant impact.⁶³ For this reason, PacifiCorp needs to have an intimate understanding of the delays and causes for delays in its level 1 condition remediation. By understanding these details, PacifiCorp can better utilize its resources and more efficiently address these issues. PacifiCorp should analyze each of the root causes for delays it has already identified and its impacts. Then PacifiCorp can modify or add to its procedures as needed to address the identified issues.

Energy Safety should require PacifiCorp to establish performance metrics and targets to measure progress on reducing delays in remediation of level 1 asset conditions. PacifiCorp should at least track the root causes of delays that it has already identified, the impact of those root causes measured in number of days for delayed remediation, the actions it is taking to address the identified root causes, and the effectiveness of its actions taken to address the root causes. PacifiCorp should describe its approach in its 2026-2028 Base WMP filing. Energy Safety should further require annual updates on PacifiCorp’s progress.

IX. AREAS FOR CONTINUED IMPROVEMENT (ACI)

A. PacifiCorp fails to comply with ACI PC-23-13.

ACI PC-23-13 pertains to issues related to the delay of level 1 or priority A condition remediation. Energy Safety required PacifiCorp to, in its 2025 WMP update, “describe the specific tools and/or process changes that will address each constraint (access, material, permitting, and resource).”⁶⁴

⁶⁰ PacifiCorp’s 2025 WMP Update, at 180.

⁶¹ PacifiCorp’s response to CalAdvocates-PacifiCorp-2025WMP-03, question 10b, July 24, 2024.

⁶² See PacifiCorp’s 2025 WMP Update.

⁶³ General Order (GO) 95 Section I: General Provisions, Rule 18, Accessed August 6, 2024.

⁶⁴ Energy Safety’s Decision on PacifiCorp’s 2023-2025 WMP, at 86-87, ACI PC-23-13.

In its 2025 WMP update, PacifiCorp fails to describe specific tools or process changes that will address each constraint (access, material, permitting, and resource constraints). Though PacifiCorp has taken corrective actions aimed at minimizing permitting delays, it is unclear what net impact has resulted from these actions. PacifiCorp provides no further details in its 2025 WMP Update.

Energy Safety should require PacifiCorp to fully comply with ACI PC-23-13 in its 2026-2028 WMP. As described in section VIII, Asset Management above, Energy Safety should require PacifiCorp to establish performance metrics related to delays in remediation of level 1 asset conditions.

X. CONCLUSION

Cal Advocates respectfully requests that Energy Safety adopt the recommendations discussed herein.

Respectfully submitted,

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