

OEIS Data Request 2.1

Regarding the Expenditure Changes for Initiative WP-01: Wildfire Mitigation Strategy Development: In its 2025 WMP Update, PacifiCorp states that the expenditure increase for initiative WP-01, “is based on actual expenditures realized as well as the inclusion of costs for an independent evaluator”.

- i. What were the original expenditures associated with the WP-01 initiative?
- ii. Where in PacifiCorp’s approved 2023-2025 Base WMP do the expenditures for WP-01 appear (section and page numbers)?
- iii. Where in PacifiCorp’s Redlined 2023-2025 Base WMP do the updated expenditures for the WP-01 initiative appear (section and page numbers)?
- iv. When did costs associated with WP-01 first appear in PacifiCorp’s QDR data (year and quarter)?
- v. Have WP-01 costs appeared in PacifiCorp’s general rate case (GRC)?
 - 1) If yes, when did they first appear and at what phase in the GRC cycle?
- vi. Was the independent evaluator required by Energy Safety or another regulator? What is the independent evaluator investigating as part of this initiative?
 - 1) Where in PacifiCorp’s approved 2023-2025 Base WMP is the independent evaluator mentioned?
 - 2) Where in PacifiCorp’s Redlined 2023-2025 Base WMP are the details regarding the independent evaluator?
- vii. How are costs allocated between the independent evaluator costs and the costs associated with carrying out the initiative?
 - 1) Was the independent evaluator included in the original cost estimate for the WP-01 initiative in PacifiCorp’s approved 2023-2025 Base WMP?
 - A. If no, please state when PacifiCorp began including the independent evaluator costs in the expenditures for the WP-01 initiative.
 - 2) Please state when costs for the independent evaluator first appeared in PacifiCorp’s QDR data.

- viii. What factors are responsible for the 55 percent cost increase in this initiative? Factors could include, but are not limited to: capital cost increases, permitting delays, supply chain disruptions, personnel, etc.

Response to OEIS Data Request 2.1

- i. The original expenditures were associated with the Wildfire Mitigation Plan (WMP) program delivery team staffing.
- ii. The expenditures for WP-01 are included in the expenditures presented in Section 4.3 Proposed Expenditures of the 2023 Final WMP February 22, 2024.
- iii. Updated expenditures for WP-01 are included in the expenditures presented in Section 4.3 Proposed Expenditures of the PacifiCorp's Redlined 2023-2025 Base WMP.
- iv. Costs associated with WP-01 first appear in the Q1 2023 Quarterly Data Report (QDR).
- v. Yes. Please refer to the Company's response to subpart 1) below:
 - 1) WP-01 costs were included in PacifiCorp's most recent general rate case (GRC) proceeding filed May 2022 (Application (A.) 22-05-006) for Test Year 2023.
- vi. The independent evaluator (IE) requirement came out of the passing of Assembly Bill 1054 and codified in Public Utilities Code - PUC § 8386.3 and required a qualified independent evaluator with experience to review and assess electrical corporations' compliance with its Wildfire Mitigation Plan.
 - 1) The IE is not a required section of Energy Safety's Wildfire Mitigation Plan templates and is therefore not specifically mentioned in the 2023-2025 Base WMP.
 - 2) The IE is not discussed in the 2023-2025 Base WMP.
- vii. The allocation of the costs for this initiative is totaled up by the funding required for the WMP program delivery team and the total cost of the IE and the work they do.
 - 1) IE cost estimates were not originally included in initiative WP-01.

- A. PacifiCorp began including the IE costs in the expenditures beginning in Q1 2024 QDR.
- 2) The costs for the IE were first reported in the Q1 2024 QDR.
- viii. The increase is based on the inclusion of the costs associated with the independent evaluator which was not included in the original plan and 2023 QDR for the 2023-2025 Base WMP.

OEIS Data Request 2.2

Regarding the Expenditure Changes for Initiative WP-02: Identifying and Evaluating Mitigation Initiatives: In its 2025 WMP Update, PacifiCorp states that the cost for initiative WP-02, “has been updated to reflect ongoing work to pursue grant opportunities”.

- i. What types of activities were included for initiative WP-02 in PacifiCorp’s approved 2023-2025 Base WMP?
- ii. What types of activities are forecasted for initiative WP-02 for 2025?
- iii. When did PacifiCorp first begin incorporating initiative WP-02 into its suite of wildfire mitigations?
- iv. Has the WP-02 initiative ever appeared in PacifiCorp’s GRC? 1) If yes, when did it appear and in what phase of the GRC?
- v. Explain what grant opportunities PacifiCorp is pursuing as part of this initiative. 1) Was grant writing originally part of this initiative? A. If no, when was this added to the scope of WP-02 and when did it first appear in PacifiCorp’s QDR data?
- vi. Explain what “ongoing work” means for this initiative.
- vii. What factors are responsible for the 180 percent cost increase in this initiative? Factors could include, but are not limited to: capital cost increases, permitting delays, supply chain disruptions, personnel, etc.

Response to OEIS Data Request 2.2

- i. WP-02 activities include industry collaboration, grant studies, and the International Wildfire Risk Mitigation Consortium (IWRMC) membership.
- ii. WP-02 activities forecasted include industry collaboration, grant studies, and IWRMC membership.
- iii. The inclusion of initiative WP-02 first started with the Company’s original 2023 Wildfire Mitigation Plan that was first filed on May 8th, 2023.
- iv. WP-02 has not appeared in a general rate case (GRC).
 - 1) Not applicable.

- v. PacifiCorp was pursuing for an award negotiations on two major competitive infrastructure grants by the United States (U.S.) Department of Energy's Grid Deployment Office. These were Grid Resilience and Innovation Partnerships grants, funded by the federal Infrastructure Investment and Jobs Act (IIJA).
 - 1) Yes, grant writing was originally part of this initiative.

- vi. "Ongoing work" is support for grant writing.

- vii. Costs increased due to studies performed for the aforementioned competitive grants.

OEIS Data Request 2.3

Regarding PacifiCorp’s Expectations for PC-23-07: Cross-Utility Collaboration on Best Practices for Inclusion of Climate Change Forecasts in Consequence Modeling, Inclusion of Community Vulnerability in Consequence Modeling, and Utility Vegetation Management for Wildfire Safety: In its 2025 WMP Update, PacifiCorp states that it “expects to participate in joint IOU workgroups or sessions”.

Explain how PacifiCorp “expects to participate.” For example:

- 1) Has PacifiCorp been invited to participate in a non-Energy Safety sponsored event hosted by the other California investor-owned utilities⁴ (IOUs) since filing its approved 2023-2025 Base WMP?
- 2) Is PacifiCorp planning on sponsoring a joint collaboration (meeting, phone call, webinar, etc.) with the other California IOUs?

Response to OEIS Data Request 2.3

- 1) PacifiCorp participated in a non-Energy Safety sponsored event hosted by another California investor-owned utility (IOU). PacifiCorp attended the “Near-Term, Risk-Informed Wildfire Mitigation Strategies” conference hosted by Pacific Gas and Electric (PG&E) in May 2024.
- 2) Currently, PacifiCorp has no plans to sponsor collaboration meetings with other California IOUs regarding topics of Best Practices for Inclusion of Climate Change Forecasts in Consequence Modeling, Inclusion of Community Vulnerability in Consequence Modeling, and Utility Vegetation Management for Wildfire Safety.

OEIS Data Request 2.4

Regarding the Collaboration Reported in PC-23-07: Cross-Utility Collaboration on Best Practices for Inclusion of Climate Change Forecasts in Consequence Modeling, Inclusion of Community Vulnerability in Consequence Modeling, and Utility Vegetation Management for Wildfire Safety: In its 2025 WMP Update, PacifiCorp states that “PacifiCorp also participates in the Covered Conductor Joint Utility Working Group to share learnings...”.

- i. Has PacifiCorp collaborated with any of the other California IOUs on the inclusion of climate change forecasts in consequence modeling, inclusion of community vulnerability in consequence modeling, utility vegetation management for wildfire safety, and/or the WMP, apart from PacifiCorp’s participation in the Covered Conductor Joint Utility Working Group?
 - 1) If yes, please state when these collaborations took place and what venue PacifiCorp used to collaborate (i.e., meeting, phone call, webinar, etc.).
- ii. PacifiCorp did not list any collaboration with Liberty Utilities or Bear Valley Electric Service. Has PacifiCorp met with Bear Valley Electric Service and/or Liberty Utilities since 2023 regarding matter related to their WMP?

Response to OEIS Data Request 2.4

- i. There have been no additional collaborations with other California investor-owned utilities (IOU) on these topics.
- ii. There have been no collaborations with Liberty Utilities or Bear Valley Electric Service on these topics.

OEIS Data Request 2.5

Regarding Status of 2025 Targets: PacifiCorp indicated to Energy Safety that some of its 2025 targets in its Redlined 2023-2025 Base WMP are still being developed (e.g., targets in Table 8-16 “Vegetation Inspections and QAQC Targets by Year”). It also confirmed that 2025 targets missing from its 2025 WMP Update were an oversight.

For all 2025 targets in PacifiCorp’s Redlined Base WMP, indicate by initiative ID and cite to its Redline and Update:

- 1) Which targets are firm.
- 2) Which targets are still being developed.

Response to OEIS Data Request 2.5

- 1) Please refer to the table provided below for a list of firm targets:

Initiative Tracking ID	Initiative/ Program	Redline Base WMP Section(s)	WMP Update Section(s)
CO-01	Public outreach and education awareness program	8.5.1.1	N/A
CO-02	Engagement with access and functional needs populations	8.5.1.1	2.1.2
CO-03	Collaboration on local wildfire mitigation planning	8.5.1.1	N/A
CO-04	Best practice sharing with other utilities	8.5.1.1	N/A
EP-01	Emergency preparedness plan	8.4.1.1	2.1.2
EP-02	External collaboration and coordination	8.1.4.1, 9.1.4	2.1.2
EP-03	Public emergency communication strategy	8.4.1, 9.1.3	N/A
EP-05	Customer support in wildfire and PSPS emergencies	9.1.3	2.1.2

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.

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Initiative Tracking ID	Initiative/ Program	Redline Base WMP Section(s)	WMP Update Section(s)
GH-01	Line Rebuild - Covered conductor installation	8.1.1.2, 9.1.4	2.1, 2.1.2
GH-02	Distribution Pole Replacement	8.1.1.2	2.1
GH-03	Transmission Pole Replacement	8.1.1.2	2.1
GH-04	Installation of system automation equipment	8.1.1.2, 9.1.4	N/A
GH-05	Expulsion Fuse Replacement	8.1.1.2	2.1, 2.1.2
AI-01	Transmission Patrol inspections	8.1.1.2	3
AI-02	Distribution Patrol Inspections	8.1.1.2	3
AI-03	Transmission Detail Inspections	8.1.1.2	2.1.2, 3
AI-04	Distribution Detail Inspections	8.1.1.2	3
AI-05	Transmission Intrusive Pole Inspections	8.1.1.2	2.1, 2.1.2, 3
AI-06	Distribution Intrusive Pole Inspections	8.1.1.2	2.1.2, 3
AI-07	Enhanced IR Inspections in transmission lines	8.1.1.2	3
AI-08	Enhanced IR Inspections in distribution lines	8.1.1.2	-
AI-11	Substation Inspections	8.1.1.2	-
AI-12	Quality assurance / quality control	8.1.6	3

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Initiative Tracking ID	Initiative/ Program	Redline Base WMP Section(s)	WMP Update Section(s)
MA-01	Maintenance: Weather Station	8.1.4	2.1.2, 5.5
RA-01	Risk and Risk Component Calculation	6.7 #1	2.1.1
RA-02	Top Risk Areas within the HFRA	6.7 #2	2.1.2
RA-03	Other Key Metrics	6.4.3, 7.1.4.1 (Risk Spend Efficiency)	-
RA-04	Enterprise System for Risk Assessment	6.7 #3	4
SA-01	Environmental monitoring systems	8.3.1.2, 9.1.4	N/A
SA-02	Grid monitoring systems	8.3.1.2	N/A
SA-03	Smoke and Air Quality Sensors	8.3.1.2	4
SA-04	Wildfire Detection Cameras	8.3.1.2	2.1.1
SA-05	Weather Forecasting	8.3.1.1	2.1, 2.1.2
SA-06	Fire potential index	8.3.1.1	-
VM-07	Clearance – Transmission	No 2025 target established. 8.2.1.1	2.1.2
VM-08	Fall-in mitigation	No 2025 target established. 8.2.3.3	-

2) 2025 targets associated with the following wildfire mitigation plan (WMP) initiatives are still being developed:

- Initiative ID 8.2.2.1 (VM-01)
- Initiative ID 8.2.2.2 (VM-02)

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- Initiative ID 8.2.2.3 (VM-03)
- Initiative ID 8.2.2.4 (VM-04)
- Initiative ID 8.2.3.1.2 (VM-05)
- Initiative ID 8.2.5 (VM-11)

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OEIS Data Request 2.6

Regarding PC-23-15 and PacifiCorp’s Response Time for Outages in its Enhanced Fire Risk (EFR) Outage Summary Spreadsheet: In its 2025 WMP Update, PacifiCorp provided an EFR outage summary spreadsheet. Some of the outage response times were negative in the spreadsheet:

- i. Were the outage response times correctly marked as negative?
 - 1) If not, please provide the correct outages response times for each.
- ii. Explain how outage response times are determined and/or calculated.

Response to OEIS Data Request 2.6

- i. Outage response times were incorrectly marked as negative and should have been 0 in those instances.
 - 1) Please refer to Attachment OEIS 2.6 which provides PacifiCorp’s updated file “EFR Outage Summary and 2023 Data Updated 08012024” with the corrected outage response times.
- ii. Outage response time is determined by calculating the sum of three key intervals:
 - 1) Interrupt to Dispatch: This is the time (in minutes) from when the first outage is received to when crews are dispatched to the site. The interval reflects how quickly the outage is identified and a response is initiated.
 - 2) Dispatch to Arrive: This measures the time from when the crews are dispatched to when they arrive on-site. It accounts for travel time and any logistical delays.
 - 3) Arrive to Restore: This is the time taken from when crews arrive on-site to when service is fully restored. It includes the time to assess the situation, perform repairs, and ensure service is safely restored.