BEFORE THE OFFICE OF ENERGY INFRASTRUCTURE SAFETY
OF THE STATE OF CALIFORNIA

Office of Energy Infrastructure Safety Natural Resources Agency 2023-2025-WMPs

PACIFICORP'S REPLY COMMENTS
REGARDING PACIFICORP'S 2025 WILDFIRE MITIGATION PLAN UPDATE

PacifiCorp, d.b.a. Pacific Power ("PacifiCorp") submits these reply comments in response to comments received from the Public Advocates Office ("Cal Advocates") regarding PacifiCorp's 2025 Wildfire Mitigation Plan Update.

I. Introduction

PacifiCorp appreciates an opportunity to respond to the thoughtful comments provided by Cal Advocates. In reply, PacifiCorp aims to give additional context for PacifiCorp's 2025 Wildfire Mitigation Plan Update relevant to the specific issues raised by Cal Advocates.

II. Predetermined PSPS Thresholds

PacifiCorp's process for determining whether to implement a Public Safety Power Shutoff ("PSPS") is reasonable and consistent with the requirements established by the California Public Utilities Commission. Cal Advocates argues that "Energy Safety should require PacifiCorp's 2026-2028 Base WMP to have clear, predetermined thresholds before a PSPS is considered." (Cal Advocates at 4.) Energy Safety should not, however, attempt to implement such a requirement. First, Cal Advocates' request poses serious questions about regulatory authority. All the complex issues surrounding PSPS, including the foundational issue of when to implement a PSPS, are extensively addressed by the California Public Utilities Commission in Rulemaking 18-12-005,

Order Instituting Rulemaking to Examine Electric Utility De-Energization of Power Lines in Dangerous Conditions. Attempting to mandate the use of certain types of thresholds would invade on the subject matter of this rulemaking. Discussions around how objective criteria might be used as "thresholds" for a PSPS decision are best addressed with the CPUC in the existing docket dedicated to that issue.

Moreover, Cal Advocates appears to misunderstand PacifiCorp's use of objective criteria in the PSPS decision-making process, thereby causing it to overstate any difference between PacifiCorp's approach and the approach employed by other utilities. There may be some misunderstanding over the term, "threshold," which can be viewed as a definitive measurement requiring a particular action… or viewed as one factor, amongst multiple factors, that has a measurable component which may prompt further PSPS consideration. PacifiCorp does use objective criteria in the process for initiating consideration of a PSPS. PacifiCorp understands that its approach is similar, in many respects, to the approach used by other utilities.

PacifiCorp's PSPS strategy involves weather forecasts by PacifiCorp Meteorology team, which focus on the overlap of two primary factors: (1) extreme wildfire potential and (2) wind-related outage potential. By their nature, forecasts involve some degree of judgment. Nonetheless, various types of objective criteria are incorporated into the process, and these criteria are critical in initiating the consideration of a PSPS event. For example, PacifiCorp determines that "extreme wildfire potential" exists when the U.S. Forest Service's Severe Fire Danger Index has reached the categories of Very High or Extreme. From there, PacifiCorp performs additional fuels analysis to identify if the fuels environment in the area of concern is at peak wildfire season dryness as observed in fuels charts. Likewise, PacifiCorp determines "outage potential" warrants PSPS consideration when winds are forecast to reach the 99th percentile for a circuit or circuit segment.

The 99th percentile is computed by comparing PacifiCorp's Weather Research Forecast ("WRF") model predicted winds with a 30-year historical weather reanalysis created using the same WRF model.

In sum, PacifiCorp is already using objective criteria in a "threshold" manner. It is not necessary, or proper, for Energy Safety to attempt to strictly define how a "threshold" might be used in a different way or mandate some other particular application of thresholds by PacifiCorp.

III. Medical Baseline Recertification

Cal Advocates suggests that "PacifiCorp should assess its MBL recertification frequency. Energy Safety should also require PacifiCorp to confirm contact information for its MBL customers." (Cal Advocates at 5.) At this time, PacifiCorp continues to believe that annual re-certification is actually better for getting more current and accurate information regarding medical baseline customers. PacifiCorp does not dispute that moving to a longer frequency may "likely develop a larger list of medically vulnerable customers." (*Id.*) But a longer list is generally not good for the program, if information is outdated or over-expansive. PacifiCorp agrees that we do not want to exclude qualifying individuals because of an annual re-certification, and PacifiCorp is exploring additional outreach methods to ensure medical baseline customers are aware of the need to re-certify and to update contact information.

IV. Fast-Trip Settings

PacifiCorp is using relay and recloser settings to mitigate wildfire risk in a prudent and reasonable manner. It would be improper for Energy Safety to dictate a specific type of relay or recloser setting. To maintain the safety and reliability of the power system, PacifiCorp always strives for the protection system to operate for fault conditions while maintaining system continuity, for all permissible operating conditions. This foundational engineering premise has not

changed with the implementation of Elevated Fire Risk settings. A reduced percentage of the available fault current is used to establish an upper limit as the initial setting criteria which must be met to provide sufficient sensitivity for the detection of faults on the system. Historical and forecasted information is then used to validate that this threshold is sufficient to accommodate loading on the protected segment of the system. This methodology produces a pick-up setting which is sensitive enough to detect fault conditions throughout the system while still reliably supporting customer demand. Fault duty at a specific location is based on system topology, which is relatively stable and maintained by the utility, while system loading is variable. This methodology places primary importance on the reliable detection of fault conditions while maintaining sufficient margin for customer load fluctuation.

Cal Advocates also argues that "Energy Safety should require PacifiCorp to explore fast-trip settings on sub-transmission." (Cal Advocates at 7.) Because of the difference in system topology and load balance on the sub-transmission system, these systems are subject to different challenges and applications which are not easily characterized by the term "fast-trip." PacifiCorp would need more explanation to make a fuller reply. The current PacifiCorp approach to wildfire risk on the sub-transmission system is to review protective settings for optimal performance and upgrade the existing relaying to modern protective relays as need dictates.

Finally, with respect to Cal Advocates' suggestions on a timeline for existing fast-trip settings review, PacifiCorp is continually reviewing the operation of its EFR settings standard based on the evaluation of field events. As operational practices change and mature, the EFR setting standard is also reviewed regularly to ensure practices correlate with settings. In the absence of events on a specific circuit the systematic review of protective settings on distribution circuits is being organized for future implementation.

V. System Hardening

PacifiCorp has analyzed, and has ongoing incentives to continue analyzing, ways to reduce the costs associated with installation of covered conductor. PacifiCorp and the other California Investor Owned Utilities ("IOUs") have worked to compare costs for covered conductor programs and published a joint paper, initially in 2022[1] and with updates in 2023.[2] In this paper, each utility discussed differences in the scope and cost drivers for covered conductor installations. Among the major differences between costs for PacifiCorp and Southern California Edison ("SCE") are the number of poles requiring replacement per mile, terrain/location, and vegetation management costs. Cal Advocates provided a cost comparison of PacifiCorp's residential rates against the national average residential rates. But in context of this discussion, a different comparison would be more meaningful. While PacifiCorp acknowledges that its rate is higher than the national average, PacifiCorp's cost per residential megawatt hour is actually the lowest of the six California IOUs.

VI. Data Quality

In response to data requests, PacifiCorp provided an updated Table 8-17 to Cal Advocates which addressed the inadvertent reporting error. PacifiCorp recognizes there are opportunities for improvement in data collection for the WMP filings and continues to look for ways to improve the quality assurance ("QA") and quality control ("QC") procedures.

[1] 2022 WMP Update Progress Report at 50, available at: 2022 WMP Update Progress Report: Issue Identified in the Final-Action Statements of the IOUs' 2021 WMP Update Limited evidence to support the effectiveness of covered conductor.

[2] 2023-2025 WMP Joint IOU Covered Conductor Working Group Report at 40, available at: https://www.pge.com/assets/pge/docs/outages-and-safety/outage-preparedness-and-support/wildfire-mitigation-plan-public-attachments.zip - 2023-03-27_PGE_2023_WMP_R0_Appendix D ACI PG&E-22-11_Atch01.

VII. Vegetation Management

PacifiCorp and Cal Advocates have substantial alignment on the work prioritization element for vegetation work. Above all, PacifiCorp does immediately resolve any vegetation issues which pose an imminent safety hazard. While those instances can typically be interpreted from review of existing data sources, PacifiCorp is exploring additional options to make such data more readily producible in the aggregate. In addition, during the pre-work inspection, the inspector already prioritizes some vegetation work for earlier completion, primarily involving removals of hazard trees or pruning vegetation infringing on regulatory clearance distances. Work is typically prioritized by using a visual indicator (using a "red dot" icon) within PacifiCorp work management software. Again, as part of its current efforts to convert to a new software system, PacifiCorp is exploring additional options to standardize the work prioritization process. In addition, PacifiCorp expects that the new software will make related data more easily produced. PacifiCorp plans to address work prioritization more fully in the 2026 WMP update.

VIII. Asset Management

Consistent with prior concerns related to PacifiCorp's available data on Level 1 conditions, PacifiCorp created a new condition priority code to capture imminent threat conditions meeting the GO95 Level 1 requirements. This new priority code is referred to as "I" for imminent threat, which was implemented in June 2024. Prior to this change, all Level 1 and some Level 2 conditions were captured as "A" priorities. Not all A priorities were considered imminent threats (Level 1) conditions. PacificCorp is working to mitigate further delays on imminent conditions by temporarily correcting the condition to reduce the risk. For example, PacifiCorp recently discovered a hot spot on an Oregon transmission switch that required immediate replacement. Due to complexities associated with design and material ordering, the switch could not be replaced

immediately. PacifiCorp removed the switch, bypassing it with jumpers, to mitigate the risk until a new switch could be designed and procured. This temporary correction is an example of how PacifiCorp is working to reduce the risk in a timely matter to account for delays associated with engineering and material procurement. By establishing a new priority code to capture Level 1 conditions only and by implementing temporary corrections to mitigate risk, PacifiCorp does not anticipate future delays in mitigating fire risks associated with Level 1 conditions. In addition, PacifiCorp has created a bi-weekly report to ensure all imminent threat conditions are timely corrected and properly documented.

IX. Conclusion

PacifiCorp appreciates this opportunity to provide these reply comments regarding the Wildfire Mitigation Plan Update for 2025. PacifiCorp respectfully requests that Energy Safety approve PacifiCorp's 2025 Wildfire Mitigation Plan Update.

Respectfully submitted,

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Dated:
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