

November 26, 2024

VIA ELECTRONIC FILING

Docket # 2024 NOV

Sheryl Billbrey
Program Manager
Environmental Science Division
Office of Energy Infrastructure Safety
715 P Street, 20th Floor
Sacramento, CA 95814

RE: PacifiCorp's Response to Notice of Violation – ESD_PC_CAC23_20240912_0738

Dear Sheryl Billbrey:

PacifiCorp provides the following response to the finding(s) identified in the “Notice of Violation ESD_PC_CAC23_20240912_0738” (Notice of Violation or NOV) issued by the Office of Energy Infrastructure Safety (Energy Safety) on October 31, 2024. On the week of September 9th, 2024, Energy Safety conducted an inspection of PacifiCorp's WMP initiatives in the vicinity of the cities of Dunsmuir and Weed, California.

Energy Safety found the following violations:

Violation 1. Energy Safety observed that in implementing 2024 WMP Initiative 8.2.2.1 Detailed Inspections and Management Practices around Distribution Electrical Lines and Equipment (VM – 01), PacifiCorp failed to adhere to WMP Initiative 8.2.3.1.1 Wood and Slash Management protocol near pole ID 247140, at coordinates 41.2185600599993, -122.27200591999792. Energy Safety considers this violation to be in the “Minor” risk category.

PacifiCorp Response:

In response to the NOV, the Company conducted a field inspection on November 1, 2024 and found that the slash and debris is well outside of 10' clearing radius and appears to be from the City pushing debris out of the road. The slash is not a result of vegetation management work for pole clearing and no debris is within 10' clearing radius. As a result, no additional corrective actions are planned. Please see below image of the field inspection on November 1, 2024.



Violation 2. Energy Safety observed that in implementing 2024 WMP initiative 8.2.2.3 Patrol Inspections of Vegetation around Distribution Electric Lines and Equipment (VM -03), PacifiCorp failed to adhere to its 8.2.3.2 Clearance protocol in achieving the required clearance near pole ID 038701, at coordinates 41.43164017, -122.40271051. Energy Safety considers this violation to be in the “Minor” risk category.

PacifiCorp Response:

PacifiCorp records show that the trees were initially pruned on May 24, 2024. The Company conducted internal audits from June 2024 - August 2024 and found that trees had grown back into the clearance threshold. The trees were listed as an audit exception on September 24, 2024, and the exception was worked, and trees were pruned to clearance on October 1, 2024. Due to the

nature of the trees and the growth rates the Company will place the trees on next year's projects and pursue removals in 2025 prior to spring growth. In response to the NOV, the Company conducted a field inspection on November 1, 2024. Please see below image of the field inspection.



PacifiCorp appreciates the opportunity to provide this response to Energy Safety's ESD_PC_CAC23_20240912_0738. Please refer any questions to Pooja Kishore, Regulatory Affairs Manager at 503-813-7314 or californiadockets@pacificorp.com.

Sincerely,

A handwritten signature in black ink that reads "Allen Berreth". The signature is written in a cursive, flowing style.

Allen Berreth
Vice President of Transmission & Distribution Operations
PacifiCorp
825 NE Multnomah Street, Suite 2000
Portland, OR 97232