

OEIS Data Request 9.8

Regarding changes in Maturity Survey responses between 2023 and 2024 surveys – Section 3.1 Asset Inventory and Condition Database

- (a) In its 2023 survey responses to question 3.1.1 Q1, PacifiCorp responded “Yes” for 2025 and 2026. However, in its 2024 survey responses to the same question, PacifiCorp responded “No.”
 - i. Explain why PacifiCorp changed its responses to this question from “Yes” in the 2023 survey to “No” in the 2024 survey.
- (b) In its 2023 survey responses to question 3.1.1 Q2, PacifiCorp responded that it would update its database weekly in 2025 and daily in 2026. In its 2024 survey responses to the same question, PacifiCorp responded that it would update the database monthly in 2025 and 2026. PacifiCorp stated that this response changed due to a “business transformation delay.”
 - i. Describe the business transformation delay, including the replaced and replacement technologies.
 - ii. Provide the expected completion date of the business transformation.
 - iii. Provide the expected frequency that the database will be updated once the business transformation is complete.
- (c) In its 2023 survey response to question 3.1.1 Q3, PacifiCorp responded that it would incorporate asset inspection findings into its database within one day in 2026. In its 2024 survey response to the same question, PacifiCorp responded that it would incorporate inspection findings within one week in 2026.
 - i. Explain why PacifiCorp changed its response to this question from one day in the 2023 survey to one week in the 2024 survey.
- (d) In its 2023 survey responses to question 3.1.2 Q1, PC responded “Yes” for 2025 and 2026. However, in its 2024 survey responses to the same question, PC responded “No.” PacifiCorp stated that this response changed due to a “business transformation delay.”
 - i. Will PacifiCorp’s database contain the information listed in question 3.1.2 Q1 after the business transformation is complete?
- (e) In its 2023 survey responses to question 3.1.2 Q3, PacifiCorp responded “Yes” for 2025 and 2026. However, in its 2024 survey responses to the same question,

PacifiCorp responded “No.”

- i. Explain why PacifiCorp changed its responses to this question from “Yes” in the 2023 survey to “No” in the 2024 survey. What business processes, if any, changed for PacifiCorp to provide a different response for 2024?
 - ii. Does the database contain the overload history for each piece of equipment in the service territory through which current passes? If not, list the equipment and/or circumstances for which the overload history is not recorded.
- (f) In its 2023 survey response to question 3.1.2 Q7, PC responded that at least 90 percent of its assets and components would have age data in 2025 and 2026. In its 2024 response to the same question, PC responded that less than 80 percent of its assets would contain age data in 2025 and 2026.
- i. Explain why PacifiCorp changed its response to this question. What business processes, if any, changed for PacifiCorp to provide a different response for 2024?
 - ii. What percentage of assets and components does PacifiCorp have age data for?
 - iii. List the assets or components PacifiCorp does not track age data for (i.e., poles, splices, conductor, hotline clamps.)
 - iv. List the assets and components PacifiCorp does track age data for.
 - v. Does PacifiCorp expect to increase the percentage of assets and components it has age data for from 2024 to 2025?

Response to OEIS Data Request 9.8

- (a) There are no current plans to provide a one-day quality assurance/quality control of conditions found during inspections. Five percent of transmission and distribution overhead inspections are audited for each district. The 5 percent is a mix of inspections with no conditions found and those with conditions found.
- (b)
 - i. See response to OEIS 9.8 subpart b, iii.
 - ii. See response to OEIS 9.8 subpart b, iii.
 - iii. The change to Question 3.1.1 Q2 of the maturity survey is based on the worst-case scenario for the time it would take data to be updated to the database. The Company has a daily process that loads data from internal inspection applications

into the mainframe. These internal records are usually uploaded within 48 business hours.

PacifiCorp's response to business transformation assumes the Company will no longer have this check-in / check-out delay in the new system of record. April 2027 is the new estimated 'go-live' date. The expected frequency for database updates in the new system will be daily.

- (c) As stated in the Company's response to subpart (b) iii above, the business transformation which incorporates the assets, inspections, and conditions within the same system will allow for the inspection findings to be incorporated within one day. The current system requires the asset to be checked out and the conditions uploaded in batches, which could happen within one week of the inspection but could happen sooner.
- (d) Currently the Company's asset information does not contain lifespan of the equipment and the expectation is that will be included when the new system goes live.
- (e) Please refer to the Company's responses to subparts i. and ii. below:
 - i. The response was changed to "No" as this information is only captured for devices that have Supervisory Control and Data Acquisition (SCADA), which is not available on all pieces of equipment.
 - ii. There will be many devices installed where current passes that do not have SCADA which could be comprised of fuses, switches, reclosers and relays. In the event that the asset does not have telemetry data being captured there is not the ability to record overload history for the device.
- (f) Please refer to the Company's responses to subparts i. through v. below:
 - i. At the time of completing the maturity survey the assumption was that the age of the equipment was unknown for more than 20 percent of the assets and that there would not be much change in the data collected for the older assets. Given the changes in practices with recording asset install dates over time, the Company revised this estimate to be less than 80 percent.
 - ii. Overhead Distribution – 100 percent
Overhead Local Transmission – 99.5 percent
Overhead Main Grid Transmission – 99.9 percent
Underground – 80.4 percent
Substation Assets – 64 percent

- iii. Please refer to the Company's response to subpart (f) iv. below.
- iv. Please refer to Attachment OEIS 9.8 which provides the table of assets and components and percentage of assets with age data. PacifiCorp's current practice is to capture dates, but that information may not be present for older equipment installed under old practices. For example, for load tap changers, the manufacturer date was tracked on the parent asset (Regulator and Transformer) and was not converted to the new load tap changer assets in Maximo.
- v. The percentage of equipment with age data is expected to increase as new equipment is installed and the data captured. With each year and with each asset inspection, the Company tries to fill in data gaps when feasible.

OEIS Data Request 9.9

Regarding changes in Maturity Survey responses between 2023 and 2024 surveys – Section 3.2 Asset Inspections

- (a) In its 2023 survey response to question 3.2.2 Q2, PacifiCorp responded “Yes” for 2025. In its 2024 response to the same question, PacifiCorp responded “No”.
 - i. Explain why PacifiCorp changed its response to this question from “Yes” in the 2023 survey to “No” in the 2024 survey.
 - ii. How does PacifiCorp calculate equipment failure probability? Please provide an example calculation for a distribution pole in a high-risk circuit, an expulsion fuse in a medium-risk circuit, and a transformer in a low-risk circuit.
- (b) In its 2023 survey response to question 3.2.2 Q3, PacifiCorp responded “Yes” for 2025. In its 2024 response to the same question, PacifiCorp responded “No”.
 - i. Explain why PacifiCorp changed its response to this question from “Yes” in the 2023 survey to “No” in the 2024 survey.

Response to OEIS Data Request 9.9

- (a) Please refer to the Company’s responses to subparts i. and ii. below:
 - i. PacifiCorp does not have measured parameters that support establishing equipment failure probabilities currently or plan to have them in the future and the Company adjusted responses to reflect that.
 - ii. PacifiCorp does not have a calculation for equipment failure probability and there is not a business initiative to create a probability of failure value.
- (b) The response was updated because the inspections are planned based on the modeling that generated the high fire risk area risk map and not off dynamic measured parameters.

OEIS Data Request 9.10

Regarding changes in Maturity Survey responses between 2023 and 2024 surveys – Section 3.3 Asset Maintenance and Repair

- (a) In its 2023 survey response to question 3.3.3 Q4, PacifiCorp responded “Yes” for 2025. In its 2024 response to the same question, PacifiCorp responded “No.”
 - i. Explain why PacifiCorp changed its response to this question from “Yes” in the 2023 survey to “No” in the 2024 survey.
 - ii. Does PacifiCorp plan to estimate equipment service life reduction based on usage and environmental conditions in the future?
- (b) In its 2024 survey response to question 3.3.3 Q5, PacifiCorp responded “Yes” for 2025. In its 2024 response to the same question, PacifiCorp responded “No.”
 - i. Explain why PacifiCorp changed its response to this question from “Yes” in the 2023 survey to “No” in the 2024 survey.
- (c) In its 2024 survey response to question 3.3.3 Q6, PacifiCorp responded “Yes” for 2025. In its 2024 response to the same question, PacifiCorp responded “No.”
 - i. Explain why PacifiCorp changed its response to this question from “Yes” in the 2023 survey to “No” in the 2024 survey.
- (d) In its 2024 survey response to question 3.3.4 Q4, PacifiCorp responded “Yes” for 2025. In its 2024 response to the same question, PacifiCorp responded “No.”
 - i. Explain why PacifiCorp changed its response to this question from “Yes” in the 2023 survey to “No” in the 2024 survey.
- (e) In its 2024 survey response to question 3.3.4 Q5, PacifiCorp responded “Yes” for 2025. In its 2024 response to the same question, PacifiCorp responded “No.”
 - i. Explain why PacifiCorp changed its response to this question from “Yes” in the 2023 survey to “No” in the 2024 survey.

Response to OEIS Data Request 9.10

- (a) Please refer to the Company’s responses to subparts i. and ii. below:
 - i. PacifiCorp changed the responses because the company does not have an estimated service life reduction based on usage and environmental factors. There

is not a current plan to implement a service life reduction based on those factors.

- ii. PacifiCorp does not have a current plan to implement a service life reduction for equipment based on environmental factors and usage. However, the company does use alternate materials for coastal locations that considers coastal environmental factors compared to inland locations.
- (b) Asset maintenance activities are only assessed twice a year and that process will continue to remain the same.
- (c) Asset maintenance activities are only assessed twice a year and that process will continue to remain the same.
- (d) Maintenance activities are not used to calculate a risk reduction based on the maintenance prioritization.
- (e) Risk buy downs are not factored into maintenance activities. Maintenance intervals are dependent on the type of equipment and maintenance performed in accordance with PacifiCorp's maintenance policies.

OEIS Data Request 9.11

Regarding changes in Maturity Survey responses between 2023 and 2024 surveys – Section 5.1 Protective Equipment and Device Settings

- (a) In its 2023 survey responses to questions 5.1.1 Q1, 5.1.1 Q2, 5.1.1 Q3, 5.1.1 Q4 and 5.1.1 Q5, PacifiCorp responded “Yes” for 2025. In its 2024 responses to the same questions, PacifiCorp responded “No.”
 - i. Explain why PacifiCorp changed each of its responses to these questions from “Yes” in the 2023 survey to “No” in the 2024 survey.
- (b) In its 2023 survey responses to questions 5.1.2 Q2, 5.1.2 Q3, and 5.1.2 Q5, PacifiCorp responded “Yes” for 2025. In its 2024 responses to the same questions, PacifiCorp responded “No.”
 - i. Explain why PacifiCorp changed each of its responses to these questions from “Yes” in the 2023 survey to “No” in the 2024 survey.
- (c) In its 2023 survey response to question 5.1.3 Q3, PacifiCorp responded “Yes” for 2025. In its 2024 response to the same question, PacifiCorp responded “No.”
 - i. Explain why PacifiCorp changed its response to this question from “Yes” in the 2023 survey to “No” in the 2024 survey.

Response to OEIS Data Request 9.11

- (a) The responses were changed because construction projects were delayed with the expectation to have the capability within 2026. The question was in relation to all recloser devices which requires the reclosers to be replaced.
- (b) The answer was changed as it requires new devices to be installed which are part of construction projects that had been delayed. The expectation is this ability will be available in 2026.
- (c) This functionality requires new devices and communications to be installed which were part of the delayed construction projects. The expectation is that this functionality will be available in 2026.

OEIS Data Request 9.13

Regarding changes in Maturity Survey responses between 2023 and 2024 surveys – Section 5.3 PSPS Operating Model

- (a) In its 2023 survey response to question 5.3.2 Q4, PacifiCorp responded “Yes” for 2025. In its 2024 response to the same question, PacifiCorp responded “No.”
 - i. Explain why PacifiCorp changed its response to this question from “Yes” in the 2023 survey to “No” in the 2024 survey.

Response to OEIS Data Request 9.13

While PacifiCorp reviews other utility best practices as individual lessons learned and standard practices, there is no standard process to test applicability of all other utility standard processes. Many other utilities processes are not applicable to PacifiCorp’s standard practices due to differing technologies and service territories.

OEIS Data Request 9.15

Regarding changes in Maturity Survey responses between 2023 and 2024 surveys – Section 6.1 Wildfire and PSPS Emergency and Disaster Preparedness Plan

- (a) In its 2023 survey responses to question 6.1.1 Q7, PacifiCorp responded “Yes” for 2025 and 2026. In its 2024 responses to the same question, PacifiCorp responded “No.”
 - i. Explain why PacifiCorp changed its responses to this question from “Yes” in the 2023 survey to “No” in the 2024 survey.
- (b) In its 2023 survey response to question 6.1.4 Q2, PacifiCorp responded “Yes” for 2025. In its 2024 response to the same question, PacifiCorp responded “No.”
 - i. Explain why PacifiCorp changed its response to this question from “Yes” in the 2023 survey to “No” in the 2024 survey.

Response to OEIS Data Request 9.15

- (a) While PacifiCorp workshops PacifiCorp’s Emergency Response Plan with local public safety partners to ensure alignment and deconflict assumptions, PacifiCorp does not have input on how much of the Emergency Response Plan is incorporated within each public safety partner’s own emergency plan. Through experience, PacifiCorp has discovered that much of the Company’s Emergency Response Plan does not overlap or apply to 75 percent or more of local public safety partner emergency operations.
- (b) PacifiCorp includes external partners in the development and updating of the Emergency Response Plan. PacifiCorp undertakes an internal planning effort and does not currently have an external third-party evaluation of the plan every five years. PacifiCorp cannot answer “Yes” to multiple consecutive years as this evaluation is on a five-year cadence. The goal will be to conduct an evaluation in 2026.

OEIS Data Request 9.16

Regarding changes in Maturity Survey responses between 2023 and 2024 surveys – Section 6.3 Public Emergency Communication Strategy

- (a) In its 2023 survey responses to question 6.3.1 Q3, PacifiCorp responded “Yes” for 2024, 2025, and 2026. In its 2024 responses to the same question, PacifiCorp responded “No.”
 - i. Explain why PacifiCorp changed each of its responses to this question from “Yes” in the 2023 survey to “No” in the 2024 survey.
- (b) In its 2023 survey responses to question 6.3.4 Q6, PacifiCorp responded “Yes” for 2025 and 2026. In its 2024 responses to the same question, PacifiCorp responded “No.”
 - i. Explain why PacifiCorp changed each of its responses to this question from “Yes” in the 2023 survey to “No” in the 2024 survey.
- (c) In its 2023 survey responses to question 6.3.4 Q14, PacifiCorp responded “Yes” for 2025 and 2026. In its 2024 responses to the same question, PacifiCorp responded “No.”
 - i. Explain why PacifiCorp changed each of its responses to this question from “Yes” in the 2023 survey to “No” in the 2024 survey.
- (d) In its 2023 survey responses to question 6.3.4 Q16, PacifiCorp responded “Yes” for 2025 and 2026. In its 2024 responses to the same question, PacifiCorp responded “No.”
 - i. Explain why PacifiCorp changed each of its responses to this question from “Yes” in the 2023 survey to “No” in the 2024 survey.

Response to OEIS Data Request 9.16

- (a) PacifiCorp has internal weather forecasting information available to all partners at all times and shares event specific information, but it is not “automated” as the question asks.
- (b) PacifiCorp does not provide support services within one hour of all wildfire detection in all areas of the service territory, as there is often not a need. PacifiCorp works with the local public safety partners to determine actual support needs and locations for those needs. PacifiCorp cannot not answer “Yes” due to the differing nature of a

wildfire detection and public safety power shutoff (PSPS) event that could potentially impact customers.

- (c) PacifiCorp shares general public information on progress but does not plan to share detailed operational practices such as the location of staff currently or in the future for safety reasons.
- (d) PacifiCorp does not currently or plan to in the future to share cyberattack information at any point in time, including during wildfires or PSPS events.

OEIS Data Request 9.17

**Regarding changes in Maturity Survey responses between 2023 and 2024 surveys –
Section 6.5 Customer Support in Wildfire and PSPS Emergencies**

- (a) In its 2023 survey responses to question 6.5.1 Q12, PacifiCorp responded “Yes” for 2024, 2025, and 2026. In its 2024 responses to the same question, PacifiCorp responded “No.”
- i. Explain why PacifiCorp changed each of its responses to this question from “Yes” in the 2023 survey to “No” in the 2024 survey.

Response to OEIS Data Request 9.17

PacifiCorp changed its responses due to the Company’s confusion around the wording of the question. It was unclear how to interpret the question and so the Company decided to change the answers to “No” because of that.

OEIS Data Request 9.18

Regarding changes in Maturity Survey responses between 2023 and 2024 surveys – Section 7.3 Engagement with AFN and Socially Vulnerable Populations

- (a) In its 2023 survey responses to question 7.3.1 Q7, PacifiCorp responded “Yes” for 2024, 2025, and 2026. In its 2024 responses to the same question, PacifiCorp responded “No.”
- i. Explain why PacifiCorp changed each of its responses to this question from “Yes” in the 2023 survey to “No” in the 2024 survey.

Response to OEIS Data Request 9.18

PacifiCorp maintains relationships with community partners in all counties. Depending on how this question is interpreted, if all public safety partners count as community partners, then PacifiCorp does maintain relationships with at least four community partners in all counties. The survey references public safety partners separately in other sections, therefore this question was interpreted as only community-based organization partners, non-governmental organizations, and service providers to the access and functional needs community. The rural nature of PacifiCorp’s service territory makes it challenging to find that number of partners in all counties. PacifiCorp continues efforts to increase the number of partnerships, and to this end, the Company added a new Access and Functional Needs (AFN) program manager in June 2024.

OEIS Data Request 9.19

Regarding changes in Maturity Survey responses between 2023 and 2024 surveys – Section 7.4 Collaboration on Local Wildfire Mitigation Planning

- (a) In its 2023 survey responses to question 7.4.1 Q5, PacifiCorp responded “Yes” for 2024, 2025, and 2026. In its 2024 responses to the same question, PacifiCorp responded “No.”
 - i. Explain why PacifiCorp changed each of its responses to this question from “Yes” in the 2023 survey to “No” in the 2024 survey.
- (b) In its 2023 survey responses to question 7.4.1 Q6, PacifiCorp responded “Yes” for 2024, 2025, and 2026. In its 2024 responses to the same question, PacifiCorp responded “No.”
 - i. Explain why PacifiCorp changed each of its responses to this question from “Yes” in the 2023 survey to “No” in the 2024 survey.
- (c) In its 2023 survey responses to question 7.4.1 Q7, PacifiCorp responded “Yes” for 2025 and 2026. In its 2024 responses to the same question, PacifiCorp responded “No.”
 - i. Explain why PacifiCorp changed each of its responses to this question from “Yes” in the 2023 survey to “No” in the 2024 survey.
- (d) In its 2023 survey responses to question 7.4.1 Q8, PacifiCorp responded “Yes” for 2024, 2025, and 2026. In its 2024 responses to the same question, PacifiCorp responded “No.”
 - i. Explain why PacifiCorp changed each of its responses to this question from “Yes” in the 2023 survey to “No” in the 2024 survey.

Response to OEIS Data Request 9.19

- (a) PacifiCorp maintains relationships with community partners in all counties. Depending on how this question is interpreted, if all public safety partners count as community partners, then PacifiCorp does maintain relationships with at least four community partners in all counties. The survey references public safety partners separately in other sections, therefore this question was interpreted as only community-based organization partners, non-governmental organizations, and service providers to the access and functional needs community. The rural nature of PacifiCorp’s service territory makes it challenging to find that number of partners in all counties. PacifiCorp continues efforts to increase the number of partnerships, and

to this end, the Company added a new Access and Functional Needs (AFN) program manager in June 2024.

- (b) PacifiCorp provides feedback for local wildfire mitigation planning activities in counties where available. There are four counties in the PacifiCorp service territory, but not all have local wildfire mitigation planning efforts, therefore there is not an opportunity to provide feedback to at least four planning activities.
- (c) The frequency of the effort is based on requests from local community partners and PacifiCorp is not familiar with planning cycles of each plan. The assumption is that the effort is based on the update cycle of the respective planning effort. The interpretation was “No” due to not meeting the minimum of four efforts in question 7.4.1 Q6 of the maturity survey.
- (d) PacifiCorp does take an active and proactive role in supporting local wildfire mitigation planning managed by local community partners. The interpretation was “No” due to not meeting the minimum of four efforts in question 7.4.1 Q6 of the maturity survey.

OEIS Data Request 9.20

Regarding changes in Maturity Survey responses between 2023 and 2024 surveys – Section 7.5 Cooperation and Best Practice Sharing with Other Electrical Corporations

- (a) In its 2023 survey responses to question 7.5.1 Q5, PacifiCorp responded “Yes” for 2024, 2025, and 2026. In its 2024 responses to the same question, PacifiCorp responded “No.”
 - i. Explain why PacifiCorp changed each of its responses to this question from “Yes” in the 2023 survey to “No” in the 2024 survey.
- (b) In its 2023 survey responses to question 7.5.1 Q6, PacifiCorp responded “Yes” for 2024, 2025, and 2026. In its 2024 responses to the same question, PacifiCorp responded “No.”
 - i. Explain why PacifiCorp changed each of its responses to this question from “Yes” in the 2023 survey to “No” in the 2024 survey.
- (c) In its 2023 survey response to question 7.5.3 Q1, PacifiCorp responded “Yes” for 2024. In its 2024 response to the same question, PacifiCorp responded “No.”
 - i. Explain why PacifiCorp changed its response to this question from “Yes” in the 2023 survey to “No” in the 2024 survey.
- (d) In its 2023 survey responses to question 7.5.3 Q5, PacifiCorp responded “Yes” for 2025 and 2026. In its 2024 responses to the same question, PacifiCorp responded “No.”
 - i. Explain why PacifiCorp changed each of its responses to this question from “Yes” in the 2023 survey to “No” in the 2024 survey.

Response to OEIS Data Request 9.20

- (a) While PacifiCorp continues to engage with other utilities to informally share information related to best practices, PacifiCorp changed its response to reflect that the Company is not currently participating in a formal, scheduled forum for sharing best practices (e.g. a workshop) comparing asset inspection, maintenance and repair procedures, training, and lessons learned with other electrical corporations.
- (b) While PacifiCorp continues to engage with other utilities to informally share information related to best practices, PacifiCorp changed its response to reflect that the Company is not currently participating in a formal, scheduled forum for sharing

- best practices (e.g. a workshop) comparing vegetation inspection, management, treatment procedures, training, and lessons learned with other electrical corporations.
- (c) While PacifiCorp continues to engage with other utilities to informally share information related to best practices, PacifiCorp changed its response to reflect that the Company is not currently participating in a formal, scheduled forum for sharing lessons learned with other California electrical corporations and implementing information from other electrical corporations regarding ignition prevention and suppression.
 - (d) PacifiCorp changed its response to reflect that the Company does not plan to have a standard process for testing applicability of best practices and lessons learned of other electrical corporations in 2025 and 2026.

OEIS Data Request 9.21

Regarding Projected Expenditure Increase for Initiative WP-01: Wildfire Mitigation Strategy Development

In Table 2-3 of PacifiCorp's 2025 WMP Update, PacifiCorp stated that it will increase its projected expenditures for Initiative WP-01 by \$301,000 (a 55 percent increase).

- (a) What timeframe is the \$301,000 expense estimated to cover?
 - i. Is it estimated to cover the year 2025 alone?
 - ii. Is it estimated to cover the entire cost of a multiyear contract? If so, which years is the contract estimated to cover?
- (b) In previous years, what was the expense amount for the Independent Evaluator?
 - i. What was the expense in the year 2020?
 - ii. What was the expense in the year 2021?
 - iii. What was the expense in the year 2022?
 - iv. What was the expense in the year 2023?
 - v. What was the expense in the year 2024?

Response to OEIS Data Request 9.21

- (a) Please refer to the Company's responses to subparts i. and ii. below:
 - i. Yes, the \$301,000 expense estimated is to cover 2025 alone.
 - ii. No. The estimate is to only cover the cost for one year of a multi-year contract. The independent evaluator (IE) multi-year contract is for 2024-2026.
- (b) Please refer to the Company's responses to subparts i. through v. below:
 - i. Actuals were \$0.
 - ii. Actuals were \$261,000.
 - iii. Actuals were \$237,000.
 - iv. Actuals were \$250,000.
 - v. Actuals were \$297,000.

OEIS Data Request 9.22

Regarding Independent Evaluator Initiative Category Reclassification - In its response to Data Request OEIS-P-WMP_2024-PC-02 Question 1 (vi), PacifiCorp stated that “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.”

- (a) Given that Assembly Bill 1054 became effective January 1, 2020,¹ what initiative category did PacifiCorp allocate the independent evaluator expense to from 2020 through the present?
 - i. Why is PacifiCorp requesting to switch the independent evaluator cost from the aforementioned initiative category to initiative WP-01 in its 2025 WMP Update?

Response to OEIS Data Request 9.22

- (a) The independent evaluator (IE) expenses prior to 2024 were not allocated to a specific initiative in the wildfire mitigation plan (WMP).
 - i. The IE initiative and costs were not included in any of the previous WMPs or reporting but are now being included in the plan to be associated with the WP-01 initiative in the 2025 WMP Update.

¹ AB-1054 Public utilities: wildfires and employee protection
(https://leginfo.ca.gov/faces/billNavClient.xhtml?bill_id=201920200AB1054, accessed Nov. 18, 2024).