

## OEIS Data Request 9.1

### **Regarding changes in Maturity Survey responses between 2023 and 2024 surveys – Section 1.1 Statistical Weather, Climate, and Wildfire Modeling**

- (a) In its 2023 survey responses to questions 1.1.2 Q9 and 1.1.2 Q10, PacifiCorp responded “Yes” for 2025. In its 2024 responses to the same questions, PacifiCorp responded “No” for 2025.
- i. Explain why PacifiCorp changed its responses to these questions from “Yes” in the 2023 survey to “No” in the 2024 survey.
  - ii. List the outputs and inputs of the weather, climate, and wildfire models currently used by PacifiCorp.
- (b) In its 2023 survey responses to questions 1.1.3 Q1, 1.1.3 Q2, 1.1.3 Q3, 1.1.3 Q4 and 1.1.3 Q5, PacifiCorp responded “Yes” for 2025. In its 2024 responses to the same questions, PacifiCorp responded “No” for 2025.
- i. Explain why PacifiCorp changed each of its responses to these questions from “Yes” in the 2023 survey to “No” in the 2024 survey.
  - ii. Does PacifiCorp have or plan to create a database to house version-controlled risk model outputs provided by its third-party vendor?
    1. Discuss why or why not.
    2. If it does plan to create a database to house version-controlled risk model outputs provided by its third-party vendor, provide an estimated completion date for creating the database.
  - iii. Does PacifiCorp provide any model inputs to its third-party vendor’s risk model(s)?
  - iv. Is PacifiCorp informed of model inputs used in its third-party vendor’s risk model(s)?
    1. If PacifiCorp is not informed of model inputs in its third-party vendor risk models, will the information be provided upon PacifiCorp’s request?
- (c) In its 2023 survey responses to questions 1.1.4 Q1, 1.1.4 Q2, and 1.1.4 Q4, PacifiCorp responded “Yes” for 2025. In its 2024 responses to the same questions, PacifiCorp responded “No” for 2025.

- i. Explain why PacifiCorp changed each of its responses to these questions from “Yes” in the 2023 survey to “No” in the 2024 survey.
- (d) In its 2023 survey responses to questions 1.1.5 Q8 and 1.1.5 Q9, PacifiCorp responded “Yes” for 2025. In its 2024 responses to the same questions, PacifiCorp responded “No” for 2025.
  - i. Explain why PacifiCorp changed each of its responses to these questions from “Yes” in the 2023 survey to “No” in the 2024 survey.
- (e) In its 2023 survey responses to questions 1.1.7 Q7, and 1.1.7 Q8, PacifiCorp responded “Yes” for 2025. In its 2024 responses to the same questions, PacifiCorp responded “No” for 2025.
  - i. Explain why PacifiCorp changed each of its responses to these questions from “Yes” in the 2023 survey to “No” in the 2024 survey.
  - ii. Explain PacifiCorp’s plan to validate changes to its modeling assumptions?
- (f) In its 2023 survey responses to questions 1.1.8 Q5, PacifiCorp responded “Yes” for 2025. In its 2024 responses to the same question, PacifiCorp responded “No” for 2025.
  - i. Explain why PacifiCorp changed its response to this question from “Yes” in the 2023 survey to “No” in the 2024 survey.
- (g) In its 2023 survey responses to questions 1.1.9 Q1, 1.1.9 Q2, 1.1.9 Q3, and 1.1.9 Q7, PacifiCorp responded “Yes” for 2025. In its 2024 responses to the same questions, PacifiCorp responded “No” for 2025.
  - i. Explain why PacifiCorp changed each of its responses to these questions from “Yes” in the 2023 survey to “No” in the 2024 survey.
- (h) In its 2023 survey responses to questions 1.1.10 Q2, 1.1.10 Q3, 1.1.10 Q5, 1.1.10 Q6, 1.1.10 Q7, 1.1.10 Q8, and 1.1.10 Q9, PacifiCorp responded “Yes” for 2025. In its 2024 responses to the same questions, PacifiCorp responded “No” for 2025.
  - i. Explain why PacifiCorp changed each of its responses to these questions from “Yes” in the 2023 survey to “No” in the 2024 survey.

**Response to OEIS Data Request 9.1**

(a) Please refer to the Company’s responses to subparts i. and ii. below:

i. 1.1.2 Q9: PacifiCorp’s 2024 response reflects to reflect availability this specific modeling capability in vendor provided product. Responses will be updated with each subsequent maturity survey response as additional capabilities are deployed or otherwise added to vendor product roadmap.

1.1.2 Q10: PacifiCorp’s 2024 response reflects to reflect availability this specific modeling capability in vendor provided product. Responses will be updated with each subsequent maturity survey response as additional capabilities are deployed or otherwise added to vendor product roadmap.

ii. Inputs of the weather, climate, and wildfire models currently used by PacifiCorp are in Table B-5 on pages 394-396 in the Revised 2023-2025 Base Wildfire Mitigation Plan (WMP) – Revision 5 - Clean and presented in the below table:

Dataset	Spatial Resolution (Meters)	Start of Dataset	Dataset Update Frequency	Source
<b>Landscape Characteristics</b>				
Terrain	10		Yearly	United States Geological Survey (USGS)
Surface Fuels	30/10	2020	Pre-Fire Season, Monthly Update in Fire Season, End of Fire Season	Technosylva
Wildland Urban Interface (WUI) and Non-Forest Fuels Land Use	30/10	2020	Twice A Year	Technosylva
Canopy Fuels (CBD, CH, CC, CBH)	30/10	2020	Pre-Fire Season, Monthly Update in Fire Season, End of Fire Season	Technosylva
Roads Network	30		Yearly	USGS
Hydrography	30		Yearly	USGS
Croplands	30	1997	Yearly	USDA
<b>Weather And Atmospheric Data</b>				
Wind Speed	2000	1990	Hourly / 96 Hour Forecast	Atmospheric Data Solutions (ADS)
Wind Direction	2000	1990	Hourly /96 Hour Forecast	ADS
Wind Gust	2000	1990	Hourly / 96 Hour Forecast	ADS
Air Temperature	2000	1990	Hourly / 96 Hour Forecast	ADS

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.

2025 WMPs/ PacifiCorp  
December 13, 2024  
OEIS-P-WMP\_2024-PC-09

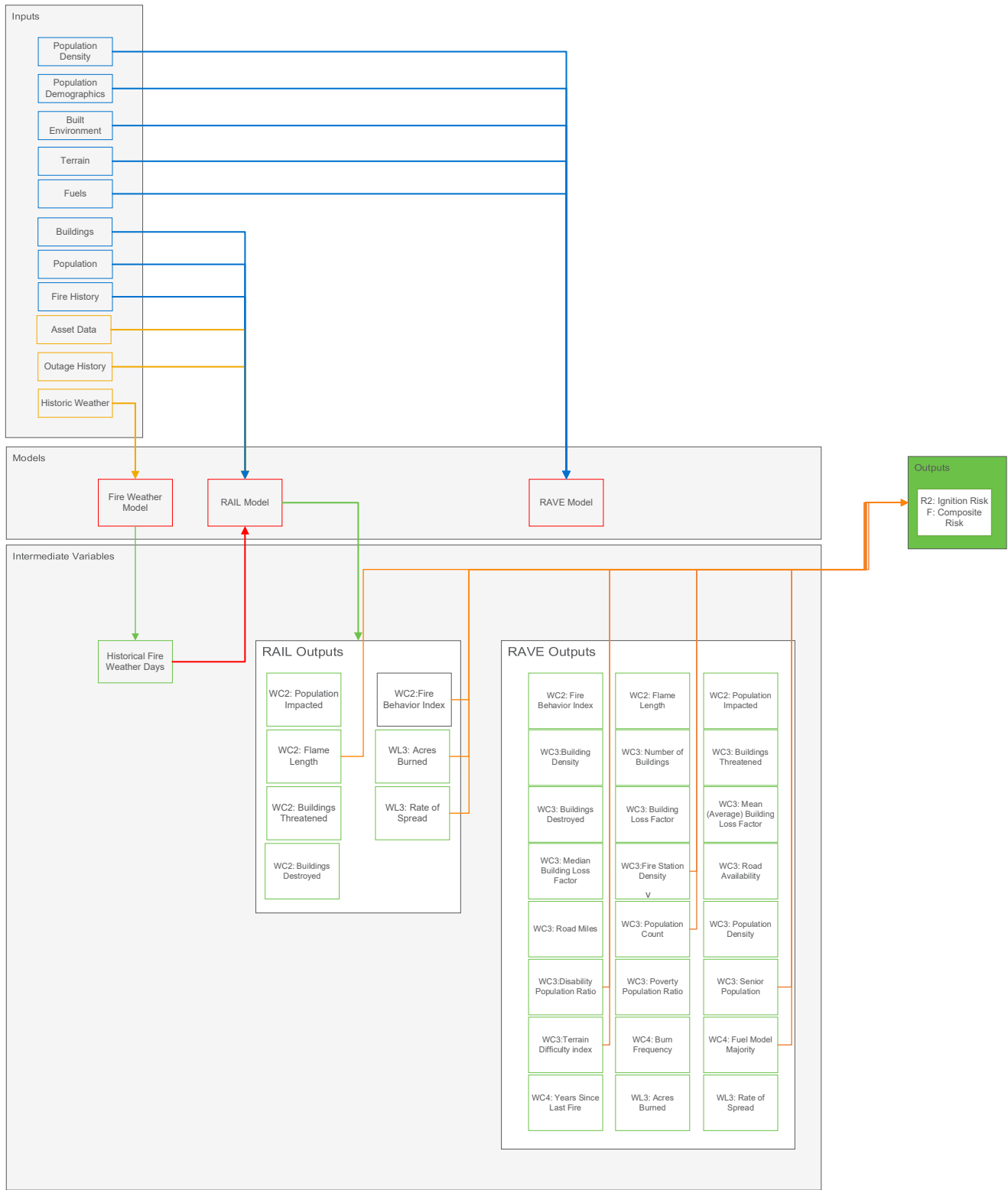
Dataset	Spatial Resolution (Meters)	Start of Dataset	Dataset Update Frequency	Source
Surface Pressure	2000	1990	Hourly / 96 Hour Forecast	ADS
Relative Humidity	2000	1990	Hourly / 96 Hour Forecast	Technosylva
Precipitation	2000	1990	Hourly / 96 Hour Forecast	ADS
Radiation	2000	1990	Hourly / 96 Hour Forecast	ADS
Water Vapor Mixing Ratio 2 meter	2000	1990	Hourly / 96 Hour Forecast	ADS
Snow Accumulated – Observed	1000	2008	Daily	National Oceanic and Atmospheric Administration (NOAA)
Precipitation Accumulated - Observed	4000	2008	Daily	NOAA
Burn Scars	10	2000	5 Days	National Aeronautics and Space Administration (NASA)/ European Space Agency (ESA)
Weather Observations Data	Points	1990	10 Min	Synoptic
<b>Fuel Moisture</b>				
Herbaceous Live Fuel Moisture	250	2000	Daily / 5-Day Forecast	Technosylva
Woody Live Fuel Moisture	250	2000	Daily / 5-Day Forecast	Technosylva / ADS
1-Hour Dead Fuel Moisture	2000	1990	Hourly / 124 Hour Forecast	Technosylva / ADS
10-Hour Dead Fuel Moisture	2000	1990	Hourly / 124 Hour Forecast	Technosylva / ADS
100-Hour Dead Fuel Moisture	2000	1990	Hourly / 124 Hour Forecast	Technosylva / ADS
<b>Values at Risk</b>				
Buildings	Polygon Footprints	2020-21	Yearly	Microsoft/Technosylva
Damage Inspection (DINS)	Points	2014-21	Yearly	Cal Fire
Population	90	2019	Yearly	LANDSCAN, Oak Ridge National Laboratory (ONRL)
Roads	Vector Lines	2021	Yearly	Caltrans
Social Vulnerability	Plexels	2021	Yearly	Esri Geoenrichment Service
Fire Stations	Points	2021	Yearly	Esri, USGS
Building Loss Factor	Building Footprints	2022	Yearly	Technosylva
Critical Facilities	Points	2021	Yearly	Fire Resource Assessment

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Dataset	Spatial Resolution (Meters)	Start of Dataset	Dataset Update Frequency	Source
				Program (FRAP), Cal Fire
<b>Potential Ignition Locations</b>				
Distribution & Transmission Lines	Linear Segments	2022	Updated Quarterly	PacifiCorp
Poles & Equipment	Points	2022	Updated Quarterly	PacifiCorp
Outage History	Points	1989	Annual	PacifiCorp
Ignition History	Points	2020	Annual	PacifiCorp
<b>Fire Activity</b>				
Hotspots MODIS	1000	2000	Twice A Day	NASA
Hotspots VIIRS	375	2014	Twice A Day	NASA
Hotspots GOES 16/17	3000	2019	10 Minute	NASA
Fireguard	Polygons	2020	15 Minute	National Guard
Fire Season Perimeters	Polygons	2021	Daily	National Incident Feature Service (NIFS)
Historic Fire Perimeters	Polygons	1900	Yearly	Cal Fire
Alert Wildfire Cameras	Live Feeds	Real Time	1 Minute	Alert Wildfire Consortium
Lighting Strikes	1000	Real Time	1 Minute	Earth Networks / Others

Outputs of the models are also shown in Figure B-6 on page 358 of the Revised 2023-2025 Base WMP – Revision 5 – Clean. Figure B-6 is presented below:

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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.

- (b) Please refer to the Company's responses to subparts i. through iv. below:
- i. PacifiCorp's 2024 response reflects use of vendor models not developed or maintained by the electrical corporation and thus subject to vendor managed controls and not directly linked to PacifiCorp systems of record.
  - ii. Yes.
    1. This database will be created to maintain version control of risk model outputs provided by the vendor to continue progression along risk modeling maturity milestones.
    2. Estimated date of completion is December 31, 2026.
  - iii. Yes. Please refer to the table provided in the Company's response to subpart (a) ii. above.
  - iv. Yes.
    1. Not applicable.
- (c) PacifiCorp's 2024 responses reflect current state of project planning and program development to meet these maturity survey milestones.
- (d) Upon further review of the related vendor documentation PacifiCorp updated its response to 1.1.5 Q8 and Q9 to more accurately align with the vendor model.
- (e) Please refer to the Company's responses to subparts i. and ii. below:
- i. PacifiCorp's 2024 response reflects to reflect availability this specific modeling capability in vendor provided product. Responses will be updated with each subsequent maturity survey response as additional capabilities are deployed or otherwise added to vendor product roadmap.
  - ii. PacifiCorp will continue to work with its modeling vendor to review and discuss changes to modeling assumptions as part of future product enhancements or modifications documented in the vendor product roadmap.
- (f) PacifiCorp reinterpreted the question in 2024 and as a practice does not currently make the non-spatial risk data public, but it is available through data request which is why the Company changed its answer.
- (g) PacifiCorp's 2024 response reflects to reflect availability this specific modeling capability in vendor provided product. Responses will be updated with each

subsequent maturity survey response as additional capabilities are deployed or otherwise added to vendor product roadmap.

- (h) The FireSight risk model that PacifiCorp uses is owned and operated by a third-party vendor, who is responsible for validation and version control of the model. As the model is owned by a third party, the source code is proprietary. PacifiCorp updated its response to 1.1.10 Q8 and Q9 based on more current information.



## OEIS Data Request 9.2

### **Regarding changes in Maturity Survey responses between 2023 and 2024 surveys – Section 1.2 Calculation of Wildfire and PSPS Risk Exposure for Societal Values**

(a) In its 2023 survey responses to questions 1.2.2 Q4, 1.2.2 Q5, 1.2.2 Q10, 1.2.2 Q11, 1.2.2 Q12, and 1.2.2 Q14, PacifiCorp responded “Yes” for 2025. In its 2024 responses to the same questions, PacifiCorp responded “No” for 2025.

- i. Explain why PacifiCorp changed each of its responses to these questions from “Yes” in the 2023 survey to “No” in the 2024 survey.
- ii. List the outputs and inputs of the wildfire and PSPS risk exposure models currently used by PacifiCorp.

(b) In its 2023 survey responses to questions 1.2.3 Q1, 1.2.3 Q2, 1.2.3 Q4, and 1.2.3 Q5, PacifiCorp responded “Yes” for 2025. In its 2024 responses to the same questions, PacifiCorp responded “No” for 2025.

- i. Explain why PacifiCorp changed each of its responses to these questions from “Yes” in the 2023 survey to “No” in the 2024 survey.
- ii. Does PacifiCorp have or plan to create a database to house version-controlled risk model outputs provided by its third-party vendor?
  1. Discuss why or why not.
  2. If so, provide an estimated completion date for the database.
- iii. Does PacifiCorp provide any model inputs to its third-party vendor’s risk models?
- iv. If PacifiCorp only provides some or none of the model inputs to its third-party vendor’s risk models, is PacifiCorp informed of all the model inputs to its third-party vendor’s risk models?
  1. If PacifiCorp is not informed of the model inputs to its third-party vendor risk models, can the third-party vendor provide the information to PacifiCorp upon PacifiCorp’s request?

(c) In its 2023 survey responses to questions 1.2.4 Q1, 1.2.4 Q2, and 1.2.4 Q3, PacifiCorp responded “Yes” for 2025. In its 2024 responses to the same questions, PacifiCorp responded “No” for 2025.

- i. Explain why PacifiCorp changed each of its responses to these questions from “Yes” in the 2023 survey to “No” in the 2024 survey.
- (d) In its 2023 survey responses to questions 1.2.6 Q5, 1.2.6 Q7, and 1.2.6 Q8, PacifiCorp responded “Yes” for 2025. In its 2024 responses to the same questions, PacifiCorp responded “No” for 2025.
- i. Explain why PacifiCorp changed each of its responses to these questions from “Yes” in the 2023 survey to “No” in the 2024 survey.

## **Response to OEIS Data Request 9.2**

- (a) Please refer to the Company’s responses to subparts i. and ii. below:
- i. PacifiCorp’s 2024 response reflects availability of this specific wildfire risk modeling capability in vendor provided product. Responses will be updated with each subsequent maturity survey response as additional capabilities are deployed or otherwise added to vendor product roadmap. At the time of submission, PacifiCorp did not have a public safety power shutoff (PSPS) risk model in production and could not indicate “Yes” when wildfire risk and PSPS models are included in the question.
  - ii. Please refer to the Company’s response to subpart (a)i. above. At the time of this response, PacifiCorp currently does not have a PSPS risk model in production.
- (b) Please refer to the Company’s responses to subparts i. through iv. below:
- i. PacifiCorp’s 2024 response reflects availability of this specific wildfire risk modeling capability in vendor provided product. Responses will be updated with each subsequent maturity survey response as additional capabilities are deployed or otherwise added to vendor product roadmap. PacifiCorp uses vendor models not developed or maintained by the electrical corporation and thus subject to vendor managed controls and not directly linked to PacifiCorp systems of record.
  - ii. Please refer to the Company’s responses to subparts 1. and 2. below:
    1. Yes.
    2. Estimated date of completion is December 31, 2026.
  - iii. Yes.

iv. Yes.

1. Not applicable.

- (c) At the time of submission, PacifiCorp did not have a formal process in place to conduct internal subject matter expert review of location specific long-term wildfire risk model outputs or compare model results to other utility model outputs where similar wildfire risk conditions are present.
- (d) PacifiCorp's 2024 response reflects availability of this specific wildfire risk modeling capability in vendor provided product. Responses will be updated with each subsequent maturity survey response as additional capabilities are deployed or otherwise added to vendor product roadmap.

### OEIS Data Request 9.3

#### **Regarding changes in Maturity Survey responses between 2023 and 2024 surveys – Section 1.3 Calculation of Community Vulnerability to Wildfire and Public Safety Power Shutoffs**

- (a) In its 2023 survey responses to questions 1.3.1 Q3 and 1.3.1 Q4, PacifiCorp responded “Yes” for 2025. In its 2024 responses to the same questions, PacifiCorp responded “No” for 2025.
- 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 1.3.2 Q5 and 1.3.2 Q7, PacifiCorp responded “Yes” for 2025. In its 2024 responses to the same questions, PacifiCorp responded “No” for 2025.
- 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 responses to questions 1.3.3 Q1, 1.3.3 Q2, 1.3.3 Q3 and 1.3.3 Q5, PacifiCorp responded “Yes” for 2025. In its 2024 responses to the same questions, PacifiCorp responded “No” for 2025.
- i. Explain why PacifiCorp changed each of its responses to these questions from “Yes” in the 2023 survey to “No” in the 2024 survey.
  - ii. Does PacifiCorp have or plan to create a database to house version-controlled community vulnerability model outputs provided by its third-party vendor?
    1. Discuss why or why not.
    2. If so, provide an estimated completion date for the database.
  - iii. Does PacifiCorp provide any model inputs to its third-party vendor’s community vulnerability models?
  - iv. If PacifiCorp only provides some or none of the model inputs to its third-party vendor’s risk models, is PacifiCorp informed of all model inputs to its third-party vendor’s community vulnerability models?
  - v. If PacifiCorp is not informed of model inputs to its third-party vendor community vulnerability models, can the inputs be provided upon PacifiCorp’s request?

- (d) In its 2023 survey response to question 1.3.4 Q1, PacifiCorp responded “Yes” for 2025. In its 2024 response to the same question PacifiCorp responded “No” for 2025.
  - 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 2023 survey responses to questions 1.3.6 Q2, 1.3.6 Q5, 1.3.6 Q7 and 1.3.6 Q8, PacifiCorp responded “Yes” for 2025. In its 2024 responses to the same questions, PacifiCorp responded “No” for 2025.
  - i. Explain why PacifiCorp changed each of its responses to these questions from “Yes” in the 2023 survey to “No” in the 2024 survey.

### **Response to OEIS Data Request 9.3**

- (a) PacifiCorp does not have a formal process in place to conduct internal subject matter expert (SME) review of discrepancies between forecasted and observed community vulnerability to wildfire and public safety power shutoff (PSPS) risk or automatically integrate those changes into its vendor provided wildfire risk model or PSPS risk model.
- (b) PacifiCorp’s 2024 response reflects availability of this specific wildfire risk modeling capability in vendor provided product. Responses will be updated with each subsequent maturity survey response as additional capabilities are deployed or otherwise added to vendor product roadmap. PacifiCorp does not have sufficient verified data on redundancy capabilities or collaborative community wildfire preparedness initiatives to include as inputs into its PSPS risk model.
- (c) Please refer to the Company’s responses to subparts i. through iv. below:
  - i. The 2024 responses reflect use of vendor models not developed or maintained by the electrical corporation and thus subject to vendor managed controls and not directly linked to PacifiCorp systems of record.
  - ii. Yes.
    - 1. This database will be created to maintain version control of risk model outputs provided by the vendor to continue progression along risk modeling maturity milestones.
    - 2. Estimated date of completion is December 31, 2026.
  - iii. No.

- iv. Yes.
  - 1. Not applicable.
- (d) PacifiCorp does not have a formal process in place to conduct internal SME review of vendor model calculations.
- (e) The Company's 2024 response reflects availability of this specific wildfire risk modeling capability in vendor provided product. Responses will be updated with each subsequent maturity survey response as additional capabilities are deployed or otherwise added to vendor product roadmap.

## OEIS Data Request 9.4

### Regarding changes in Maturity Survey responses between 2023 and 2024 surveys – Section 1.4 Calculation of Risk and Risk Components

- (a) In its 2023 survey responses to questions 1.4.1 Q2 and 1.4.1 Q4 PacifiCorp responded “Yes” for 2025 and 2026. In its 2024 responses to the same questions, PacifiCorp responded “No” for 2025 and 2026.
- 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 1.4.2 Q2, 1.4.2 Q3, 1.4.2 Q4, 1.4.2 Q5, 1.4.2 Q6, and 1.4.2 Q7, PacifiCorp responded “Yes” for 2025 and 2026. In its 2024 responses to the same questions, PacifiCorp responded “no” for 2025 and 2026.
- 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 responses to questions 1.4.2 Q6, and 1.4.2 Q7, PacifiCorp responded “Yes” for 2026. In its 2024 responses to the same questions, PacifiCorp responded “No” for 2026.
- i. Explain why PacifiCorp changed each of its responses to these questions from “Yes” in the 2023 survey to “No” in the 2024 survey.
- (d) In its 2023 survey responses to questions 1.4.3 Q1, 1.4.3 Q2 and 1.4.3 Q4, PacifiCorp responded “Yes” for 2025 and 2026. In its 2024 responses to the same questions, PacifiCorp responded “No” for 2025 and 2026.
- i. Explain why PacifiCorp changed each of its responses to these questions from “Yes” in the 2023 survey to “No” in the 2024 survey.
- (e) In the Maturity Survey Comment Section of Section 1.4.3, PacifiCorp commented “The FireSight wildfire risk model is owned by a third-party vendor who provides the model outputs to PacifiCorp. The vendor has separate development and production environments that are version controlled”.
- i. Question 1 of Section 1.4.3 asked, “Are risk model inputs version controlled and maintained in the electrical corporation’s database(s)?” Given that PacifiCorp’s comment only mentioned the outputs of the FireSight model (not the inputs), explain how PacifiCorp controls and maintains the model inputs.
  - ii. Question 4 of Section 1.4.3 asked, “Are the databases of model inputs and outputs appropriately linked with each relevant electrical corporation database (assets, weather, vegetation)?” Given that PacifiCorp’s comment only mentioned the outputs of the FireSight model, explain how the inputs are linked with PacifiCorp’s database.

- (f) In its 2023 survey responses to questions 1.4.4 Q1, 1.4.4 Q2, 1.4.4 Q4, and 1.4.4 Q6, PacifiCorp responded “Yes” for 2025 and 2026. In its 2024 responses to the same questions, PacifiCorp responded “no” for 2025 and 2026.
  - i. Explain why PacifiCorp changed each of its responses to these questions from “Yes” in the 2023 survey to “No” in the 2024 survey.
- (g) In its 2023 survey responses to questions 1.4.5 Q10, and 1.4.5 Q11, PacifiCorp responded “Yes” for 2025 and 2026. In its 2024 responses to the same questions, PacifiCorp responded “No” for 2025 and 2026.
  - i. Explain why PacifiCorp changed each of its responses to these questions from “Yes” in the 2023 survey to “No” in the 2024 survey.
- (h) In its 2023 survey responses to questions 1.4.7 Q2, 1.4.7 Q5, 1.4.7 Q7, and 1.4.7 Q8, PacifiCorp responded “Yes” for 2025 and 2026. In its 2024 responses to the same questions, PacifiCorp responded “No” for 2025 and 2026.
  - i. Explain why PacifiCorp changed each of its responses to these questions from “Yes” in the 2023 survey to “No” in the 2024 survey.
- (i) In its 2023 survey response to question 1.4.7 Q3, PacifiCorp responded “Yes” for 2025. In its 2024 response to the same question, PacifiCorp responded “No” for 2025.
  - i. Explain why PacifiCorp changed its response to this question from “Yes” in the 2023 survey to “No” in the 2024 survey.
- (j) In its 2023 survey responses to questions 1.4.7 Q6 and 1.4.7 Q9, PacifiCorp responded “Yes” for 2026. In its 2024 responses to the same questions, PacifiCorp responded “No” for 2026.
  - i. Explain why PacifiCorp changed each of its responses to these questions from “Yes” in the 2023 survey to “No” in the 2024 survey.
- (k) In its 2023 survey responses to questions 1.4.9 Q1, 1.4.9 Q2, 1.4.9 Q7, and 1.4.9 Q9, PacifiCorp responded “Yes” for 2025 and 2026. In its 2024 responses to the same questions, PacifiCorp responded “No” for 2025 and 2026.
  - i. Explain why PacifiCorp changed each of its responses to these questions from “Yes” in the 2023 survey to “No” in the 2024 survey.

#### **Response to OEIS Data Request 9.4**

- (a) PacifiCorp’s 2024 response reflects availability of this specific wildfire risk modeling capability in vendor provided product. Responses will be updated with each subsequent maturity survey response as additional capabilities are deployed or otherwise added to vendor product roadmap.
- (b) PacifiCorp does not compare life safety, reliability, affordability, property protection,



resiliency, or environmental protection on a relative basis in its updated wildfire risk scoring methodology. Wildfire risk score calculations do account for potential impacts to people and property through use of FireSight outputs related to population characteristics and the number of structures present.

- (c) PacifiCorp does not compare life safety, reliability, affordability, property protection, resiliency, or environmental protection on a relative basis in its updated wildfire risk scoring methodology. Wildfire risk score calculations do account for potential impacts to people and property through use of FireSight outputs related to population characteristics and the number of structures present.
- (d) PacifiCorp intends to deploy a database to maintain and control risk model outputs by December 31, 2026.
- (e) Please refer to the Company's responses to subparts i. and ii. below:
  - i. PacifiCorp provides the vendor with datasets extracted from its system of record for asset information, system topology, and outage history. These data extracts are retrained on SharePoint for future reference.
  - ii. PacifiCorp provides the vendor with datasets extracted from its system of record for asset information, system topology, and outage history. This data transfer is not directly linked to PacifiCorp databases.
- (f) At the time of submission, PacifiCorp did not have a formal process in place to conduct internal subject matter expert (SME) review of location specific long-term wildfire risk model outputs or engage an independent, third-party to review its risk maps. PacifiCorp does not currently plan to fund independent research on wildfire risk modeling.
- (g) PacifiCorp's 2024 response reflects availability of this specific wildfire risk modeling capability in vendor provided product. Responses will be updated with each subsequent maturity survey response as additional capabilities are deployed or otherwise added to vendor product roadmap. Wildfire risk models do account for ignition likelihood from contact with objects and vegetation through use of PacifiCorp outage data.
- (h) PacifiCorp's 2024 responses reflect availability of this specific wildfire risk modeling capability in vendor provided product. Responses will be updated with each subsequent maturity survey response as additional capabilities are deployed or otherwise added to vendor product roadmap.
- (i) Wildfire risk model outputs are controlled by the vendor implemented prior to the processing and delivery of each annual data set which does not necessarily align with the wildfire mitigation plan (WMP) filing cycle. At the time of submission, PacifiCorp did not have insight into its 2026 delivery timeline.
- (j) Wildfire risk model outputs are controlled by the vendor implemented prior to the processing and delivery of each annual data set which does not necessarily align with the WMP filing cycle. At the time of submission, PacifiCorp did not have insight into its 2026

## OEIS Data Request 9.5

### **Regarding changes in Maturity Survey responses between 2023 and 2024 surveys – Section 1.5 Risk Event Tracking and Integration of Lessons Learned**

- (a) In its 2023 survey response to question 1.5.1 Q1, PacifiCorp responded “No” for 2024. In its 2024 response to the same question, PacifiCorp responded “Yes” for 2024.
- i. Explain why PacifiCorp changed its response to this question from “Yes” in the 2023 survey to “No” in the 2024 survey.
- (b) In its 2023 survey responses to questions 1.5.1 Q2 and 1.5.1 Q3, PacifiCorp responded “Yes” for 2025 and 2026. In its 2024 responses to the same questions, PacifiCorp responded “no” for 2025 and 2026.
- 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 responses to question 1.5.2 Q2, PacifiCorp responded “Yes” for 2025 and 2026. In its 2024 responses to the same question, PacifiCorp responded “No” for 2025 and 2026.
- i. Explain why PacifiCorp changed its response to this question from “Yes” in the 2023 survey to “No” in the 2024 survey.
  - ii. Question 1.5.2 Q2 asked “Are wildfire- and PSPS-related risk events formally tracked in the electrical corporation corrective action program?” Explain why wildfire- and PSPS-related risk events are not formally tracked in the electrical corporation corrective action program.
- (d) In its 2023 survey responses to question 1.5.3 Q3, PacifiCorp responded “Yes” for 2025 and 2026. In its 2024 responses to the same question, PacifiCorp responded “No” for 2025 and 2026.
- i. Explain why PacifiCorp changed its response to this question from “Yes” in the 2023 survey to “No” in the 2024 survey.
  - ii. Question 1.5.3 Q3 asked “Are actions to prevent recurrence formally documented and tracked within the electrical corporation’s WMP?” Explain why these actions are not tracked within the electrical corporation’s WMP.
- (e) In its 2023 survey responses to questions 1.4.7 Q6 and 1.4.7 Q9, PacifiCorp responded “Yes” for 2026. In its 2024 responses to the same questions, PacifiCorp

- responded “No” for 2026.
- i. Explain why PacifiCorp changed each of its responses to these questions from “Yes” in the 2023 survey to “No” in the 2024 survey.
- (f) In its 2023 survey responses to question 1.5.3 Q1 PacifiCorp responded “2 (within one year) and 4 (within one quarter)” for 2025 and 2026 respectively. In its 2024 responses to the same question, PacifiCorp responded “1 (never) and 2 (at least annually) for 2025 and 2026, respectively.
- i. Explain why PacifiCorp changed each of its responses to these questions in the 2024 survey.
- (g) In its 2023 survey responses to question 1.5.4 Q4, PacifiCorp responded “Yes” for 2025 and 2026. In its 2024 responses to the same question, PacifiCorp responded “No” for 2025 and 2026.
- i. Explain why PacifiCorp changed its responses to this question from “Yes” in the 2023 survey to “No” in the 2024 survey.
- (h) In its 2023 survey responses to questions 1.5.5 Q1, 1.5.5 Q2, and 1.5.5 Q3 PacifiCorp responded “Yes” for 2025 and 2026. In its 2024 responses to the same questions, PacifiCorp responded “No” for 2025 and 2026.
- i. Explain why PacifiCorp changed each of its responses to these questions from “Yes” in the 2023 survey to “No” in the 2024 survey.
- (i) In its 2023 survey responses to questions 1.5.6 Q1, 1.5.6 Q2, 1.5.6 Q3, and 1.5.6 Q4, PacifiCorp responded “Yes” for 2025 and 2026. In its 2024 responses to the same questions, PacifiCorp responded “No” for 2025 and 2026.
- i. Explain why PacifiCorp changed each of its responses to these questions from “Yes” in the 2023 survey to “No” in the 2024 survey.

### **Response to OEIS Data Request 9.5**

- (a) PacifiCorp does not have a process in place to automatically include risk events in a corrective action program or automatically prioritize risk events for subject matter expert review.
- (b) PacifiCorp does not have a process in place to automatically include risk events into model quality and validation.
- (c) Please refer to the Company’s responses to subparts i. and ii. below:

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.

- i. PacifiCorp reviewed the question and determined that there was no formal plan to include wildfire and public safety power shutoff (PSPS) related risk event tracking within the corrective action program.
  - ii. Currently, PacifiCorp collects information on utility-related incidents such as ignitions and outages and performs analysis of the incidents. Based on the results of the analysis, there may be updates to company material or construction standards. Asset management policies and procedures, or no additional action if it was determined the equipment performed as expected.
- (d) Please refer to the Company's responses to subparts i. and ii. below:
- i. PacifiCorp interprets this as a question regarding Maturity Survey Question 1.5.2 Q3. Based on the foregoing interpretation, the Company responds as follows:  
  
PacifiCorp reviewed the question and determined that there was no formal plan to include recurrence prevention tracking within the Wildfire Mitigation Plan for 2025 and 2026.
  - ii. PacifiCorp interprets this as a question regarding Maturity Survey Question 1.5.2 Q3. Based on the foregoing interpretation, the Company responds as follows:  
  
PacifiCorp does track ignition incidents internally in the incident tracking database but did not include this data in the 2023-2025 Base Wildfire Mitigation Plan (WMP).
- (e) Wildfire risk model outputs are controlled by the vendor implemented prior to the processing and delivery of each annual data set which does not necessarily align with the WMP filing cycle. At the time of submission, PacifiCorp did not have insight into its 2026 delivery timeline.
- (f) Upon further review, PacifiCorp determined it does not have a process in place to formally track risk events as part of corrective action program.
- (g) PacifiCorp's 2024 responses reflect use of vendor models not developed or maintained by the electrical corporation and thus subject to vendor managed controls and not directly linked to PacifiCorp systems of record.
- (h) Upon further review, PacifiCorp determined it does not have operational practices or processes in place to integrate lessons learned from risk events to improve its wildfire mitigation program. Currently, PacifiCorp collects information on utility-

related incidents such as ignitions and outages and performs analysis of the incidents. Based on the results of the analysis, there may be updates to company material or construction standards. Asset management policies and procedures, or no additional action if it was determined the equipment performed as expected.

- (i) Upon further review, PacifiCorp determined it does not have a process in place to complete these tasks as part of a corrective action program.

## OEIS Data Request 9.6

### **Regarding changes in Maturity Survey responses between 2023 and 2024 surveys – Section 1.6 Risk-Informed Wildfire Mitigation Strategy**

- (a) In its 2023 survey responses to questions 1.6.1 Q1, 1.6.1 Q3, and 1.6.1 Q7, PacifiCorp responded “Yes” for 2025 and 2026. In its 2024 responses to the same questions, PacifiCorp responded “No” for 2025 and 2026.
  - 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 1.6.1 Q5, 1.6.1 Q6, and 1.6.1 Q8, PacifiCorp responded “Yes” for 2026. In its 2024 responses to the same questions, PacifiCorp responded “No” for 2026.
  - 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 responses to questions 1.6.2 Q4, 1.6.2 Q5, and 1.6.2 Q6, PacifiCorp responded “Yes” for 2025 and 2026. In its 2024 responses to the same questions, PacifiCorp responded “No” for 2025 and 2026.
  - i. Explain why PacifiCorp changed each of its responses to these questions from “Yes” in the 2023 survey to “No” in the 2024 survey.
- (d) In its 2023 survey responses to question 1.6.3 Q1 PacifiCorp responded “2 (at least annually) and 3 (twice per year)” for 2025 and 2026 respectively. In its 2024 responses to the same question, PacifiCorp responded “2 (at least annually) for 2025 and 2026.”
  - i. Explain why PacifiCorp changed its responses to this question in the 2024 survey.
- (e) In its 2023 survey responses to questions 1.6.4 Q1, 1.6.4 Q2, 1.6.4 Q3, and 1.6.4 Q4, PacifiCorp responded “Yes” for 2025 and 2026. In its 2024 responses to the same questions, PacifiCorp responded “No” for 2025 and 2026.
  - i. Explain why PacifiCorp changed each of its responses to these questions from “Yes” in the 2023 survey to “No” in the 2024 survey.
- (f) In its 2023 survey responses to questions 1.6.5 Q2, 1.6.5 Q4, 1.6.5 Q5, 1.6.5 Q6, and 1.6.5 Q8 PacifiCorp responded “Yes” for 2025 and 2026. In its 2024 responses to the

- same questions, PacifiCorp responded “No” for 2025 and 2026.
- i. Explain why PacifiCorp changed each of its responses to these questions from “Yes” in the 2023 survey to “No” in the 2024 survey.
- (g) In its 2023 survey response to question 1.6.5 Q7, PacifiCorp responded “No” for 2025. In its 2024 response to the same question, PacifiCorp responded “Yes” for 2025.
- i. Explain why PacifiCorp changed its response to this question from “No” in the 2023 survey to “Yes” in the 2024 survey.
- (h) In its 2023 survey response to question 1.6.7 Q1, PacifiCorp responded “Yes” for 2025. In its 2024 response to the same question, PacifiCorp responded “No” for 2025.
- i. Explain why PacifiCorp changed its response to this question from “Yes” in the 2023 survey to “No” in the 2024 survey.
- (i) In its 2023 survey responses to questions 1.6.7 Q2, 1.6.7 Q4, 1.6.7 Q5, 1.6.7 Q7, and 1.6.7 Q8, PacifiCorp responded “Yes” for 2025 and 2026. In its 2024 responses to the same questions, PacifiCorp responded “No” for 2025 and 2026.
- i. Explain why PacifiCorp changed each of its responses to these questions from “Yes” in the 2023 survey to “No” in the 2024 survey.
- (j) In its 2023 survey responses to questions 1.6.8 Q2, 1.6.8 Q3, 1.6.8 Q5, 1.6.8 Q6, and 1.6.8 Q7, PacifiCorp responded “Yes” for 2025 and 2026. In its 2024 responses to the same questions, PacifiCorp responded “No” for 2025 and 2026.
- i. Explain why PacifiCorp changed each of its responses to these questions from “Yes” in the 2023 survey to “No” in the 2024 survey.
- (k) In its 2023 survey response to question 1.6.8 Q4, PacifiCorp responded “Yes” for 2025. In its 2024 response to the same question, PacifiCorp responded “No” for 2025.
- 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 9.6**

- (a) PacifiCorp’s 2024 response reflects availability of this specific wildfire risk modeling capability in vendor provided product. Responses will be updated with each subsequent maturity survey response as additional capabilities are deployed or otherwise added to vendor product roadmap.

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.

- (b) PacifiCorp's 2024 response reflects availability of this specific wildfire risk modeling capability in vendor provided product. Responses will be updated with each subsequent maturity survey response as additional capabilities are deployed or otherwise added to vendor product roadmap. PacifiCorp does not have a formal process in place to conduct internal subject matter expert (SME) review of discrepancies between forecasted and observed risk estimations.
- (c) PacifiCorp's 2024 response reflects availability of this specific wildfire risk modeling capability in vendor provided product. Responses will be updated with each subsequent maturity survey response as additional capabilities are deployed or otherwise added to vendor product roadmap.
- (d) PacifiCorp's 2024 responses reflect updated intentions for future wildfire risk buy-down estimates and management review periodicities.
- (e) PacifiCorp's 2024 responses reflect use of vendor models not developed or maintained by the electrical corporation and thus subject to vendor managed controls and not directly linked to PacifiCorp systems of record. As discussed in responses above, PacifiCorp intends to deploy a database to maintain and control risk model outputs by December 31, 2026.
- (f) At the time of submission, PacifiCorp did not have a formal process in place to conduct internal or external SME review of risk reduction estimates or observations.
- (g) PacifiCorp began participating in recurring meetings with other utilities to discuss risk reduction estimates for various wildfire mitigation in 2024 and expects to continue doing so in 2025.
- (h) PacifiCorp's 2024 response reflects availability of this specific wildfire risk modeling documentation in vendor provided product. Responses will be updated with each subsequent maturity survey response as additional documentation becomes available in the future.
- (i) PacifiCorp's 2024 response reflects availability of this specific wildfire risk modeling capability in vendor provided product. Responses will be updated with each subsequent maturity survey response as additional capabilities are deployed or otherwise added to vendor product roadmap.
- (j) PacifiCorp's 2024 response reflects availability of this specific wildfire risk modeling capability in vendor provided product. Responses will be updated with each subsequent maturity survey response as additional capabilities are deployed or otherwise added to vendor product roadmap.



- (k) PacifiCorp's 2024 response reflects availability of this specific wildfire risk modeling capability in vendor provided product. Responses will be updated with each subsequent maturity survey response as additional capabilities are deployed or otherwise added to vendor product roadmap.

## **OEIS Data Request 9.7**

### **Regarding changes in Maturity Survey responses between 2023 and 2024 surveys – Section 2 Situational Awareness and Forecasting**

- (a) In its 2023 survey responses to question 2.1.1 Q6, PacifiCorp responded “Yes” for 2025 and 2026. In its 2024 responses to the same question, PacifiCorp responded “No” for 2025 and 2026.
  - 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 2.2.5 Q5, PacifiCorp responded “Yes” for 2025 and 2026. In its 2024 responses to the same question, PacifiCorp responded “No” for 2025 and 2026.
  - i. Explain why PacifiCorp changed each of its responses to this question from “Yes” in the 2023 survey to “No” in the 2024 survey.
  - ii. Will PacifiCorp begin implementing the usage of ensemble weather forecasting (using varying initial conditions in which one is the control forecast) after Jan 1, 2026?

## **Response to OEIS Data Request 9.7**

- (a) PacifiCorp’s 2024 response reflects availability of this specific wildfire risk modeling capability in vendor provided product. Responses will be updated with each subsequent maturity survey response as additional capabilities are deployed or otherwise added to vendor product roadmap.
- (b) Please refer to the Company’s responses to subparts i. and ii. below:
  - i. PacifiCorp’s 2024 response reflects availability of this specific wildfire risk modeling capability in vendor provided product. Responses will be updated with each subsequent maturity survey response as additional capabilities are deployed or otherwise added to vendor product roadmap.
  - ii. Yes.

## **OEIS Data Request 9.12**

### **Regarding changes in Maturity Survey responses between 2023 and 2024 surveys – Section 5.2 Incorporation of Ignition Risk Factors in Grid Control**

- (a) In its 2023 survey response to question 5.2.1 Q1, 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.
- (b) In its 2023 survey responses to questions 5.2.2 Q1 and 5.2.2 Q2, 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 questions 5.2.3 Q2, 5.2.3 Q3, and 5.2.3 Q4, PacifiCorp responded “Yes” for 2025. In its 2024 response 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.
- (d) In its 2023 survey response to question 5.2.5 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 9.12**

- (a) Upon further review, PacifiCorp determined it did not have a program in place reduce the expected life of assets based on grid operating history or an approved plan to do so.
- (b) Upon further review, PacifiCorp determined it did not have a program in place to track this information for use in wildfire risk mitigation or an approved plan to do so.
- (c) Upon further review, PacifiCorp determined it did not have a program in place to track this information or an approved plan to do so.

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- (d) Upon review of the 2023 Survey, the Company's response should have been "No" in the 2023 submittal.

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### **OEIS Data Request 9.14**

#### **Regarding changes in Maturity Survey responses between 2023 and 2024 surveys – Section 5.5 Ignition Prevention and Suppression**

- (a) In its 2023 survey responses to questions 5.5.1 Q1, 5.5.1 Q4, and 5.5.1 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.

### **Response to OEIS Data Request 9.14**

- (a) Upon further review, PacifiCorp determined it does not have a program in place to formally complete these actions or an approved plan to do so.