



January 10, 2025

Melissa Swenson  
Director of Wildfire Mitigation Program Delivery  
PacifiCorp *dba* Pacific Power  
825 NE Multnomah St, Ste 2000  
Portland, OR 97232

**Subject: Notice on Errata for PacifiCorp 2025 Wildfire Mitigation Plan Update**

Ms. Swenson:

PacifiCorp submitted its 2025 Wildfire Mitigation Plan Update (2025 WMP Update) and revised 2023-2025 Base Wildfire Mitigation Plan (2023-2025 Base WMP) (redlined and clean versions) to the Office of Energy Infrastructure Safety’s (Energy Safety) 2023-2025 WMPs docket on July 8, 2024.<sup>1</sup> PacifiCorp submitted a revision of each per Energy Safety’s Rejection and Order to Resubmit to the same docket on September 20, 2024. Following PacifiCorp’s resubmission, Energy Safety identified substantive and non-substantive errors that remain for PacifiCorp to correct.

All changes to PacifiCorp’s approved 2023-2025 Base WMP (i.e., Revision #2) and to its initially filed 2025 WMP Update (i.e., Revision #0), both identified and not identified in this request for errata, must be depicted in redline. All new text must be underlined and removed text must be in strikeout.

**PacifiCorp must revise its 2025 WMP Update and 2023-2025 Base WMP to correct the substantive and non-substantive errors identified in Appendix A, herein. PacifiCorp must submit its Revised 2025 WMP Update and Revised 2023-2025 Base WMP to Energy Safety’s 2023-2025 WMPs docket by January 17, 2025.**

If PacifiCorp makes corrections to its 2025 WMP Update and 2023-2025 Base WMP beyond those in Appendix A, it must provide a list of each correction in its cover letter that will accompany its response to this Notice on Errata.

The schedule for this PacifiCorp Notice on Errata is as follows:

Revised PacifiCorp 2025 WMP Update R2  
and 2023-2025 Base WMP R6 due:

January 17, 2025

---

<sup>1</sup> [PacifiCorp 2025 WMP Update R0](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56990&shareable=true) (Jul. 8, 1014)  
(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56990&shareable=true>, accessed Oct. 27, 2024)  
and [PacifiCorp 2023-2025 Base WMP R3](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56991&shareable=true) (Jul. 8, 2024)  
(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56991&shareable=true>, accessed Oct 27, 2024).

Draft Decision on PacifiCorp 2025 WMP Update  
issued no later than:

January 31, 2025

Sincerely,

/s/ Tony Marino

Tony Marino  
Acting Deputy Director | Electrical Infrastructure Directorate  
Office of Energy Infrastructure Safety

Encl: Appendix A: Substantive and Non-Substantive Errors in the PacifiCorp 2025 WMP  
Update R1 and 2023-2025 Base WMP R5

**APPENDIX A: Substantive and Non-Substantive Errors in PacifiCorp 2025 WMP Update R1 and 2023-2025 Base WMP R5**

**Table 1. Substantive and Non-substantive Errors in PacifiCorp 2025 WMP Update R1**

2025 WMP Update R1		
Section	Page Number	Correction or Clarification
<b>Substantive</b>		
<b>Section 2 Changes to Approved Targets, Objectives, and Expenditures</b>	16-23 <sup>1</sup>	Energy Safety’s 2025 WMP Update Guidelines (“2025 WMP Update Guidelines”) require in “Section 2 Changes to Approved Targets, Objectives, and Expenditures” that “[e]ach change must be justified by lessons learned, internal policy changes, new laws or regulations, corrective actions resulting from Energy Safety’s compliance process, or other explanations for the change.” <sup>2</sup> PacifiCorp did not provide responsive information in its 2025 WMP Update for any Section 2 reportable update.  <b>PacifiCorp must include in Section 2, each change must be justified by lessons learned, internal policy changes, new laws or regulations,</b>

<sup>1</sup> All references are to [PacifiCorp 2025 WMP Update R1](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57396&shareable=true) (redlined) (Sep. 20, 2024) unless otherwise indicated (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57396&shareable=true, accessed Oct. 18, 2024).

<sup>2</sup> [Energy Safety 2025 Wildfire Mitigation Plan Update Guidelines \(adopted Jan. 2024, published Feb. 2024\)](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56254&shareable=true) (hereafter 2025 WMP Update Guidelines), p. 13 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56254&shareable=true, accessed Nov 3, 2024).

2025 WMP Update R1		
Section	Page Number	Correction or Clarification
		<b>corrective actions resulting from Energy Safety’s compliance process, or other explanations for the change.</b> <sup>3</sup>
<b>Section 3 Quarterly Inspection Targets for 2025</b>	23-24	The 2025 WMP Update Guidelines require that “Table 3-1, 2025 Quarterly Inspection Targets,” include column “End of Year Target 2025 & Unit”. <sup>4</sup> Energy Safety’s Rejection and Order to Resubmit for the PacifiCorp 2025 Wildfire Mitigation Plan Update also identified that Table 3-1 was missing columns. <sup>5</sup>  <b>PacifiCorp must include required column “End of Year Target 2025 &amp; Unit” in Table 3-1.</b>
<b>Section 3 Quarterly</b>	23-24	The 2025 WMP Update Guidelines require reportable updates to be in the 2025 WMP Update, Redlined 2023-2025 Base WMP, and the Clean Updated

<sup>3</sup> For example, see Data Response OEIS-P-WMP\_2024-PC-07, [Question 8](#) and Attachments [1](#), [2](#), and [3](#) (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57522&shareable=true>; <https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57523&shareable=true>; <https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57524&shareable=true>; and <https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57525&shareable=true>, accessed Nov. 20, 2024).

<sup>4</sup> [2025 WMP Update Guidelines](#), p. 15 (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56254&shareable=true>, accessed Oct 21, 2024).

<sup>5</sup> [Energy Safety Rejection and Order to Resubmit for PacifiCorp 2025 WMP Update, p. 5](#) (Sep. 6, 2024) (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57324&shareable=true>, accessed Nov. 20, 2024).

2025 WMP Update R1		
Section	Page Number	Correction or Clarification
<b>Inspection Targets for 2025</b>		<p>2023-2025 Base WMP.<sup>6</sup> In PacifiCorp’s 2023-2025 Base WMP R5 it appropriately reports 2025 quarterly (end of Q2 and end of Q3) targets for QAQC - Post-Audits Distribution (Patrol) and QAQC – Post Audits Transmission (Patrol) (VM-11) in Table 8-15,<sup>7</sup> in accordance with Section 3 of the WMP Update Guidelines.<sup>8</sup> However, these quarterly targets are not included in PacifiCorp’s 2025 WMP Update.</p> <p><b>PacifiCorp must include its reported 2025 quarterly targets for QAQC - Post-Audits Distribution (Patrol) and QA/QC – Post Audits Transmission (Patrol) (VM-11) in Table 3-1 of its 2025 WMP Update.</b></p>
<b>Section 4 New or Discontinued Programs</b>	24-25	<p>In “Table PAC 4-1 New or Discontinued Programs,” the row for RA-04 (initiative “Enterprise System for Risk Assessment [ID# RA-04]”) is in error. As PacifiCorp clarified in a Data Request response, RA-04 is a completed program as of Q4 2023.<sup>9</sup> A completed program is not a discontinued program. A discontinued program is one where the electrical corporation</p>

<sup>6</sup> [2025 WMP Update Guidelines](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56254&shareable=true), p. 3-4 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56254&shareable=true, accessed Nov. 13, 2024).

<sup>7</sup> [PacifiCorp 2023-2025 Base WMP R5 \(redlined\)](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57394&shareable=true) (Sep. 20, 2024), p. 224-225 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57394&shareable=true, accessed Nov. 13, 2024).

<sup>8</sup> [2025 WMP Update Guidelines](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56254&shareable=true), p. 15 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56254&shareable=true, accessed Nov. 13, 2024).

<sup>9</sup> PacifiCorp response to Data Request [OEIS-P-WMP 2024-PC-08](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57597&shareable=true), Question 4 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57597&shareable=true, accessed Nov. 8, 2024).

2025 WMP Update R1		
Section	Page Number	Correction or Clarification
		has elected to stop or cease to continue rather than one where the program requirements have been fulfilled.  <b>PacifiCorp must remove all references to initiative RA-04 as a discontinued program from Section 4.</b>
<b>Non-substantive</b>		
<b>Section 4 New or Discontinued Programs</b>	25	PacifiCorp identified Smoke and Air Quality Sensors (ID# SA-03) as a discontinued program. <sup>10</sup> PacifiCorp’s WMP Update and revised 2023-2025 Base WMP language are inconsistent in the number of sensors that have been removed. In its revised 2023-2025 Base WMP, PacifiCorp stated that it installed 20 sensors. <sup>11</sup> In both its revised 2023-2025 Base WMP <sup>12</sup> and its WMP Update, <sup>13</sup> PacifiCorp states that “the currently installed sensor will

<sup>10</sup> [PacifiCorp 2025 WMP Update R1 \(redlined\)](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57396&shareable=true) (Sep. 20, 2024), p. 25 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57396&shareable=true, accessed Nov. 20, 2024).

<sup>11</sup> [PacifiCorp 2023-2025 Base WMP R5 \(redlined\)](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57394&shareable=true) (Sep. 20, 2024), p. 260 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57394&shareable=true, accessed Nov. 13, 2024).

<sup>12</sup> [PacifiCorp 2023-2025 Base WMP R5 \(redlined\)](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57394&shareable=true) (Sep. 20, 2024), p. 260 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57394&shareable=true, accessed Nov. 13, 2024).

<sup>13</sup> [PacifiCorp 2025 WMP Update R1 \(redlined\)](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57396&shareable=true) (Sep. 20, 2024), p. 25 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57396&shareable=true, accessed Nov. 20, 2024).

2025 WMP Update R1		
Section	Page Number	Correction or Clarification
		<p>be removed,” suggesting that a singular sensor has been removed. In response to a data request, PacifiCorp indicated that 20 sensors were deployed in 2023 and as of September 2024 zero have been removed.<sup>14</sup></p> <p><b>PacifiCorp must correct its 2023-2025 Base WMP and WMP Update text to properly reflect how many sensors were deployed and if a sensor (or sensors) will be removed.</b></p>
<b>Overall</b>	Multiple	<p>Throughout its 2025 WMP Update R1 redlined version, PacifiCorp included redline errors without the required redlining required by Energy Safety’s Rejection and Order to Resubmit<sup>15</sup> and the 2025 WMP Update Guidelines.<sup>16</sup></p> <p>For example:</p> <ul style="list-style-type: none"> <li>The table in “Section 2.1 2025 Targets or Target Completion Dates,”<sup>17</sup> included a line for Active Wildfire De-Energization. PacifiCorp is correctly not including a line for Active Wildfire De-</li> </ul>

<sup>14</sup> Data Request [OEIS-P-WMP\\_2024-PC-07](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57529&shareable=true), Question 9 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57529&shareable=true, accessed Nov 3, 2024).

<sup>15</sup> [Energy Safety Rejection and Order to Resubmit for PacifiCorp 2025 WMP Update](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57324&shareable=true) (Sep. 6, 2024) (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57324&shareable=true, accessed Nov. 8, 2024).

<sup>16</sup> [2025 WMP Update Guidelines](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56254&shareable=true), p. 4 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56254&shareable=true, accessed Nov. 8, 2024).

<sup>17</sup> [PacifiCorp 2025 WMP Update R0](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56987&shareable=true) (Jul. 8, 2024), pp. 13-14 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56987&shareable=true, accessed Oct. 27, 2024).

2025 WMP Update R1		
Section	Page Number	Correction or Clarification
		<p>Energization in its 2025 WMP Update R1;<sup>18</sup> however the line must be included as strikeout in R1.</p> <ul style="list-style-type: none"><li>• In Table PAC 2-2 for initiative activities VM-11, only the information in the “Updated Forecasted Completion Date” column is changed from PacifiCorp’s 2025 WMP Update R0 and only the information in the “Updated Forecasted Completion Date” column should be in redline.”<sup>19</sup> PacifiCorp incorrectly shows all five columns for the two VM-11 initiatives activities in redline.</li><li>• In Table PAC 2-2, “Changes to Initiative Objectives from Forecasted Completion Date,” initiative “Install Wildfire Detection Cameras (ID# SA-04)” in PacifiCorp’s 2025 WMP Update R1 has no change from PacifiCorp’s 2025 WMP Update R0 and should therefore not be in redline in R1.<sup>20</sup></li></ul>

---

<sup>18</sup> [PacifiCorp 2025 WMP Update R1](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57396&shareable=true) (redlined) (Sep. 20, 2024), p. 17 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57396&shareable=true, accessed Oct. 18, 2024).

<sup>19</sup> [PacifiCorp 2025 WMP Update R1](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57396&shareable=true) (redlined) (Sep. 20, 2024), pp. 18, 20 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57396&shareable=true, accessed Oct. 18, 2024).

<sup>20</sup> [PacifiCorp 2025 WMP Update R1](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57396&shareable=true) (redlined) (Sep. 20, 2024), p. 20 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57396&shareable=true, accessed Oct. 18, 2024).



2025 WMP Update R1		
Section	Page Number	Correction or Clarification
		<b>In its forthcoming 2025 WMP Update R2 submission, PacifiCorp must clearly redline all text that will be added to, or removed from, the 2023-2025 Base WMP (redlined version).</b>

**Table 2. Substantive and Non-substantive Errors in PacifiCorp  
 2023-2025 Base WMP R5**

2023-2025 Base WMP R5		
Section	Page Number	Correction or Clarification
<b>Substantive</b>		
<b>Section 7.1.4.2 Mitigation Initiative Prioritization</b>	153-157	The 2025 WMP Update Guidelines require that the 2023-2025 Base WMP reflect all reportable updates. <sup>21</sup> “Table PAC 7-2 PacifiCorp Mitigations” does not reflect all initiatives in the HFRA. <sup>22</sup>  <b>PacifiCorp must correctly reflect all HFRA initiatives in Table PAC 7-2.</b>
<b>8.1.1.2 Targets</b>	170-171	In reporting a 2025 target for “Quality Assurance Control (ID #AI-12),” PacifiCorp also identified new 2023 and 2024 targets. <sup>23</sup> The 2025 WMP Update Guidelines requires that

---

<sup>21</sup> [2025 WMP Update Guidelines](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56254&shareable=true), p. 4 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56254&shareable=true, accessed Nov. 13, 2024).

<sup>22</sup> Data Request [OEIS-P-WMP\\_2024-PC-05](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57303&shareable=true), Questions 2 and 3 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57303&shareable=true, accessed Oct. 27, 2024).

<sup>23</sup> [PacifiCorp 2025 WMP Update R1](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57396&shareable=true) (redlined) (Sep. 20, 2024), pp. 17-18 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57396&shareable=true, accessed Oct. 18, 2024).

2023-2025 Base WMP R5		
Section	Page Number	Correction or Clarification
		<p>only qualifying 2025 targets may be updated.<sup>24</sup> Furthermore, there were no 2023-2025 targets approved for AI-12 in PacifiCorp’s 2023-2025 Base WMP.<sup>25</sup></p> <p><b>PacifiCorp must remove the content in the 2023 and 2024 cells in Table 8-4 to show that no targets were approved for 2023 and 2024.</b></p>
<p><b>Section 8.1.2.12 Expulsion Fuse Replacements</b></p> <p><b>Section 8.1.4 Equipment Maintenance and Repair</b></p>	180 and 194	<p>The 2025 WMP Update Guidelines require that the 2023-2025 Base WMP reflect all reportable updates.<sup>26</sup> PacifiCorp’s 2025 WMP Update indicates an expenditure increase for the Expulsion Fuse Replacement (ID# GH-05) initiative due to an additional 500 expulsion fuses to be replaced in 2025.<sup>27</sup> Other portions of the 2023-2025 Base WMP R5 do not revise the initiative’s completion date of 2024.<sup>28</sup></p> <p><b>PacifiCorp must reflect the correct completion date for the Expulsion Fuse Replacement initiative (ID# GH-05) throughout its WMP.</b></p>

<sup>24</sup> [2025 WMP Update Guidelines](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56254&shareable=true), p. 15 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56254&shareable=true, accessed Nov. 13, 2024).

<sup>25</sup> [PacifiCorp 2023-2025 Base WMP R2](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56336&shareable=true), pp. 136-137 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56336&shareable=true, accessed Nov. 13, 2024).

<sup>26</sup> [2025 WMP Update Guidelines](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56254&shareable=true), p. 4 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56254&shareable=true, accessed Nov. 13, 2024).

<sup>27</sup> [PacifiCorp 2025 WMP Update R1](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57396&shareable=true) (redlined) (Sep. 20, 2024), pp. 17-18, 21-23 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57396&shareable=true, accessed Oct. 18, 2024).

<sup>28</sup> [PacifiCorp 2023-2025 Base WMP R5](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57394&shareable=true) (redlined) (Sep. 20, 2024), p. 194 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57394&shareable=true, accessed Nov. 13, 2024).

2023-2025 Base WMP R5		
Section	Page Number	Correction or Clarification
<b>Section 8.2.1.2 Targets</b>	223-224	In PacifiCorp’s 2023-2025 Base WMP R5, it updated its approved end-of-year 2025 targets for pole clearing (VM-05), detailed inspections - distribution (VM-01), and detailed inspection - transmission (VM-02). These updates to its Base WMP resulted in increases of approximately 2.1, 0.8, and 3.6 percent, respectively. These updates do not meet the 10 percent reportable threshold set by the 2025 WMP Update Guidelines. <sup>29</sup>  <b>PacifiCorp must remove these updates from its 2023-2025 Base WMP.</b>
<b>Section 8.3.1.2 Targets</b>	252	The 2025 WMP Update Guidelines require that the 2023-2025 Base WMP reflect all reportable updates. <sup>30</sup> PacifiCorp indicated that initiative Smoke and Air Quality Sensors (ID# SA-03) ended on December 31, 2023 <sup>31</sup> and reported it as a discontinued program. <sup>32</sup> In Table 8-23, “Situational Awareness Initiative Targets by Year,” PacifiCorp provides a “2024 Target & Unit,” of “N/A” and a “2025 Target & Unit,” of “N/A.”

<sup>29</sup> [2025 WMP Update Guidelines](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56254&shareable=true), pp. 5, 13 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56254&shareable=true, accessed Nov. 13, 2024).

<sup>30</sup> [2025 WMP Update Guidelines](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56254&shareable=true), p. 4 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56254&shareable=true, accessed Nov. 13, 2024).

<sup>31</sup> Data Request [OEIS-P-WMP\\_2024-PC-07](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57529&shareable=true), Question 9 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57529&shareable=true, accessed Nov. 1, 2024).

<sup>32</sup> [PacifiCorp 2025 WMP Update R1](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57396&shareable=true) (redlined) (Sep. 20, 2024), p. 25 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57396&shareable=true, accessed Dec 2, 2024).

2023-2025 Base WMP R5		
Section	Page Number	Correction or Clarification
		<b>For SA-03, PacifiCorp must indicate in a footnote that the program was discontinued and ended December 31, 2023.</b>
<b>Section 8.3.4.1 Existing Ignition Detection Sensors and Systems</b>	260	<b>Similar to Section 4 New or Discontinued Programs of its 2025 WMP Update, PacifiCorp must correct Section 8.3.4.1 of its revised 2023-2025 Base WMP R5 to properly reflect how many smoke and air quality sensors (SA-03) were removed.</b>
<b>Section 10 Lessons Learned</b>	361	In “Table 10-1 Lessons Learned,” in response to Energy Safety’s Rejection and Order to Resubmit for PacifiCorp 2025 WMP Update, <sup>33</sup> PacifiCorp made a change to the text in row 8, column 5 (“Description of Lesson Learned”) and column 6 (“Proposed WMP Improvement”). The change, however, left the sentences with incomplete infinitive phrases, impairing sentence clarity.  <b>PacifiCorp must clarify the language in “Table 10-1 Lessons Learned,” row 8, columns 5 and 6.</b>
<b>Overall</b>	Multiple	Throughout its 2023-2025 Base WMP R5 (redlined), PacifiCorp did not use proper redline formatting (e.g., underline all new text to its 2023-2025 Base WMP R2 and strikeout all removed text). For example:

---

<sup>33</sup> [Energy Safety Rejection and Order to Resubmit for PacifiCorp 2025 WMP Update](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57324&shareable=true) (Sep. 6, 2024) (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57324&shareable=true, accessed Nov. 13, 2024).

2023-2025 Base WMP R5		
Section	Page Number	Correction or Clarification
		<ul style="list-style-type: none"><li>• All text in “Section 5.4.3.2 Social Vulnerability and Exposure to Electrical Corporation Wildfire Risk,” is new and not indicated as new (e.g., in redline).<sup>34</sup> The original text from PacifiCorp’s 2023-2025 Base WMP R2<sup>35</sup> is not indicated as removed (e.g., in strikeout).</li><li>• All text in- “Section 6 Risk Methodology and Assessment,” is new and not indicated as new (e.g., in redline).<sup>36</sup> The original text from PacifiCorp’s 2023-2025 Base WMP R2<sup>37</sup> is not indicated as removed (e.g., in strikeout).</li><li>• “Table PAC 7-2 PacifiCorp Mitigations” is not properly redlined.”<sup>38</sup> Text changes from PacifiCorp’s 2023-2025 Base WMP R2 as not properly reflected.<sup>39</sup> For example:</li></ul>

<sup>34</sup> [PacifiCorp 2023-2025 Base WMP R5 \(redlined\)](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57394&shareable=true) (Sep. 20, 2024), pp. 74-76 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57394&shareable=true, accessed October 18, 2024).

<sup>35</sup> [PacifiCorp 2023-2025 Base WMP R2](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56336&shareable=true), pp. 59-60 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56336&shareable=true, accessed Oct. 27, 2024).

<sup>36</sup> [PacifiCorp 2023-2025 Base WMP R5 \(redlined\)](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57394&shareable=true) (Sep. 20, 2024), pp. 82-133 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57394&shareable=true, accessed October 18, 2024).

<sup>37</sup> [PacifiCorp 2023-2025 Base WMP R2](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56336&shareable=true), pp. 66-104 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56336&shareable=true, accessed Oct. 27, 2024).

<sup>38</sup> [PacifiCorp 2023-2025 Base WMP R5 \(redlined\)](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57394&shareable=true) (Sep. 20, 2024), pp. 153-157 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57394&shareable=true, accessed October 18, 2024).

<sup>39</sup> [PacifiCorp 2023-2025 Base WMP R2](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56336&shareable=true), pp. 122-124 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56336&shareable=true, accessed Oct. 27, 2024).

2023-2025 Base WMP R5		
Section	Page Number	Correction or Clarification
		<ul style="list-style-type: none"> <li>○ The HFRA column must be indicated as new (e.g., underlined) as the column was not in PacifiCorp’s 2023-2025 Base WMP R2.</li> <li>○ The row for CO-02 must be indicated as new (e.g., underlined) as it was not in PacifiCorp’s 2023-2025 Base WMP R2.</li> <li>○ The row for CO-03 must be indicated as new (e.g., underlined) as it was not in PacifiCorp’s 2023-2025 Base WMP R2.</li> <li>● “Table 8-3 Grid Design, Operations, and Maintenance Targets by Year,” is not properly redlined.<sup>40</sup> For example:                         <ul style="list-style-type: none"> <li>○ The “2025 Target &amp; Unit” for initiative GH-03 has been changed from PacifiCorp’s 2023-2025 Base WMP R2, yet the 2025 value is not shown in redline.</li> <li>○ The “2025 Target &amp; Unit” for initiative GH-05 has been changed from PacifiCorp’s 2023-2025 Base WMP R2, yet the 2025 value is not shown in redline.</li> <li>○ GH-12 is a completely new initiative, yet the row is not shown in redline at all.</li> </ul> </li> </ul>

---

<sup>40</sup> [PacifiCorp 2023-2025 Base WMP R5 \(redlined\)](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57394&shareable=true) (Sep. 20, 2024), p. 169 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57394&shareable=true, accessed October 18, 2024).

2023-2025 Base WMP R5		
Section	Page Number	Correction or Clarification
		<ul style="list-style-type: none"> <li>In Section 8.3.4.1, “Existing Ignition Detection Sensors and Systems,” PacifiCorp added text to the Smoke and Air Quality Sensor subsection. The next text is not indicated in redline (e.g., underlined).<sup>41</sup></li> </ul> <p><b>As required in Energy Safety’s Rejection and Order to Resubmit for the PacifiCorp 2025 Wildfire Mitigation Plan Update, <u>all</u> text in PacifiCorp’s 2023-2025 Base WMP R6 that PacifiCorp seeks to add to its 2023-2025 WMP R2 must be indicated as new (e.g., underlined).<sup>42</sup></b></p> <p><b>As required in Energy Safety’s Rejection and Order to Resubmit for the PacifiCorp 2025 Wildfire Mitigation Plan Update, <u>all</u> text in PacifiCorp’s 2023-2025 Base WMP R6 that PacifiCorp seeks to remove from its 2023-2025 Base R2 must be indicated as removed (e.g., in <del>strikeout</del> or underline).<sup>43</sup></b></p>
<b>Non-substantive</b>		

<sup>41</sup> [PacifiCorp 2023-2025 Base WMP R5 \(redlined\)](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57394&shareable=true) (Sep. 20, 2024), p. 260 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57394&shareable=true, accessed October 18, 2024).

<sup>42</sup> [Energy Safety Rejection and Order to Resubmit for PacifiCorp 2025 WMP Update](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57324&shareable=true) (Sep. 6, 2024) (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57324&shareable=true, accessed Jan. 8, 2025).

<sup>43</sup> [Energy Safety Rejection and Order to Resubmit for PacifiCorp 2025 WMP Update](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57324&shareable=true) (Sep. 6, 2024) (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57324&shareable=true, accessed Jan. 8, 2025).



2023-2025 Base WMP R5		
Section	Page Number	Correction or Clarification
<b>Section 5.4.3.1 Individuals at Risk from Wildfire</b>	73	The text "Table PAC 5-2 below shows the distribution of AFN customers in the HFTD" is the incorrect table reference and is hyperlinked incorrectly.  <b>PacifiCorp must correctly reference “Table PAC 5-4” and correct the hyperlink, so it points to Table PAC 5-4.</b>
<b>Section 5.4.3.2 Social Vulnerability and Exposure to Electrical Corporation Wildfire Risk</b>	76	The text in Section 5.4.3.2 Social Vulnerability and Exposure to Electrical Corporation Wildfire Risk states that the figure below, “Figure 5-20 Social Vulnerability Index Map,” shows the location of the HFTD and HFRA overlaying the 2020 US Census Social Vulnerability Index percentiles. However, Figure 5-20 instead shows the HFTD and the “FHCA.” It is not clear whether FHCA is equivalent to HFRA.  <b>PacifiCorp must provide an updated Figure 5-20 showing the location of the HFTD and HFRA overlaying the 2020 US Census Social Vulnerability Index percentiles.</b>
<b>Section 8.5.4 Collaboration on Local Wildfire Mitigation Planning</b>	344	The text, “See Table 8-45 for this information,” is missing the name of Table 8-45.  <b>PacifiCorp must include the name of the table with the text, “See Table 8-45 for this information.”</b>