

January 17, 2025

***VIA OEIS E-FILING***  
(Docket #2023-2025 WMPs)

Office of Energy Infrastructure Safety  
715 P Street, 20th Floor  
Sacramento, CA 95814  
[efiling@energysafety.ca.gov](mailto:efiling@energysafety.ca.gov)

**RE: PacifiCorp's 2025 Wildfire Mitigation Plan Update Errata**

Dear Director Jacobs:

In accordance with the Office of Energy Infrastructure Safety's January 10, 2025, Notice on Errata for PacifiCorp 2025 Wildfire Mitigation Plan Update (Notice), PacifiCorp d/b/a Pacific Power provides this revised 2025 Wildfire Mitigation Plan Update errata.

This submittal includes the following documents, which will be filed in Energy Safety Docket #2023-2025 WMPs and posted on the Company's website:<sup>1</sup>

- 1) 2025 WMP Update (standalone document) – Revision 2 (R2) [clean and redline]
- 2) Revised 2023-2025 Base WMP – Revision 6 (R6) [clean and redline]<sup>2</sup>
- 3) Three attachments from prior revisions to the 2023-2025 Base WMP (no changes in January 17, 2025 submission):
  - CA Line Rebuild Data 2023-2025.xlsx (2023-2025 Base WMP Revision 3)
  - EFR Outage Summary and 2023 Data.xlsx [Revised August 01, 2024] (2023-2025 Base WMP Revision 4)
  - PC-23-07\_Joint\_IOU\_CC Effectiveness Workstream\_2025 WMP Report FINAL (2023-2025 Base WMP Revision 3)

Additional detail regarding the specific changes in each of the revised documents is provided in the tables below. The Company made substantive and non-substantive changes, as directed in Appendix A of Energy Safety's Notice:

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<sup>1</sup> <https://www.pacificorp.com/community/safety/wildfire-mitigation-plans.html>

<sup>2</sup> This submission includes the revisions in the Company's August 19, 2024 and September 20, 2024 submissions of 2025 Wildfire Mitigation Plan Update Errata filings.

## 1) Revisions to 2025 Wildfire Mitigation Plan Update Rev 2

| Revisions in 2025 WMP Update Rev 2                                  |   |   |
|---|---|---|
| Section   | Correction or Clarification   | PacifiCorp Revision   |
| Section 2 Changes to Approved Targets, Objectives, and Expenditures | 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." PacifiCorp did not provide responsive information in its 2025 WMP Update for any Section 2 reportable update. PacifiCorp must include in Section 2, each 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. | Updated Section 2 for each initiative and provided the reason for the change. |
| Section 3 Quarterly Inspection Targets for 2025                     | The 2025 WMP Update Guidelines require that "Table 3-1, 2025 Quarterly Inspection Targets," include column "End of Year Target 2025 & Unit". 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 PacifiCorp must include required column "End of Year Target 2025 & Unit" in Table 3-1.  | Updated Table 3-1 to include the column "End of Year Target 2025 & Unit"      |
| Section 3 Quarterly Inspection Targets for 2025                     | The 2025 WMP Update Guidelines require reportable updates to be in the 2025 WMP Update, Redlined 2023-2025 Base WMP, and the Clean Updated 2023-2025 Base WMP. 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, in accordance with Section 3 of the WMP Update Guidelines. However, these quarterly targets are not included in PacifiCorp's 2025 WMP Update. 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.       | Updated Table 3-1 to include targets for VM-11 initiatives.                   |
| Section 4 New or Discontinued Programs                              | 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. A completed program is not a discontinued program. A discontinued program is one where the electrical corporation has elected to stop or cease to continue rather than one where the program requirements have been fulfilled. PacifiCorp must remove all references to initiative RA-04 as a discontinued program from Section 4.   | References to RA-04 are now removed from the Section 4.                       |

# PacifiCorp 2025 Wildfire Mitigation Plan Update – Revised Errata

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| Revisions in 2025 WMP Update Rev 2     |  |  |
|--|--|--|
| Section                                | Correction or Clarification  | PacifiCorp Revision  |
| Section 4 New or Discontinued Programs | PacifiCorp identified Smoke and Air Quality Sensors (ID# SA-03) as a discontinued program. 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. In both its revised 2023-2025 Base WMP and its WMP Update, PacifiCorp states that "the currently installed sensor will 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. 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.   | References to SA-04 now refer to plural sensors and the numbers of sensors deployed and to be removed is provided as appropriate.  |
| Overall                                | <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 Resubmit15 and the 2025 WMP Update Guidelines.</p> <p>For example:</p> <ul style="list-style-type: none"> <li>· The table in "Section 2.1 2025 Targets or Target Completion Dates," included a line for Active Wildfire De-Energization.</li> </ul> <p>PacifiCorp is correctly not including a line for Active Wildfire De Energization in its 2025 WMP Update R1; 18 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." 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 R1.2</li> </ul> <p>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).</p> | <ul style="list-style-type: none"> <li>• Active Wildfire De-energization has been struck out.</li> <li>• Updated Table PAC 2-2, VM-11 so only the change is in redline and not the entire column.</li> <li>• Updated Table 2-2 to strike out SA-04.</li> </ul> |

## 2) Revisions to the 2023-2025 Base Wildfire Mitigation Plan Revision 6

| Revisions in 2023-2025 Base WMP Revision 6                      |   |  |
|---|---|--|
| Section   | Correction or Clarification   | PacifiCorp Revision  |
| Section 8.3.1.2 Targets   | The 2025 WMP Update Guidelines require that the 2023-2025 Base WMP reflect all reportable updates. PacifiCorp indicated that initiative Smoke and Air Quality Sensors For SA-03, PacifiCorp must indicate in a footnote that the program was discontinued and ended December 31, 2023. (ID# SA-03) ended on December 31, 2023 and reported it as a discontinued program.<br>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."<br>For SA-03, PacifiCorp must indicate in a footnote that the program was discontinued and ended December 31, 2023. | Updated with footnotes that this initiative is discontinued.           |
| Section 8.3.4.1 Existing Ignition Detection Sensors and Systems | 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.   | Number of sensors deployed and to be removed is added as appropriate.  |
| Section 10 Lessons Learned                                      | In "Table 10-1 Lessons Learned," in response to Energy Safety's Rejection and Order to Resubmit for PacifiCorp 2025 WMP Update, 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. PacifiCorp must clarify the language in "Table 10-1 Lessons Learned," row 8, columns 5 and 6   | Provided further clarifications to Table 10-1, Row 8, columns 5 and 6. |
| Section 7.1.4.2 Mitigation Initiative Prioritization            | The 2025 WMP Update Guidelines require that the 2023-2025 Base WMP reflect all reportable updates. "Table PAC 7-2 PacifiCorp Mitigations" does not reflect all initiatives in the HFRA. PacifiCorp must correctly reflect all HFRA initiatives in Table PAC 7-2.  | Updated Table PAC 7-2.   |
| 8.1.1.2 Targets   | In reporting a 2025 target for "Quality Assurance Control (ID #AI-12)," PacifiCorp also identified new 2023 and 2024 targets. The 2025 WMP Update Guidelines requires that only qualifying 2025 targets may be updated. Furthermore, there were no 2023-2025 targets approved for AI-12 in PacifiCorp's 2023-2025 Base WMP.<br>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.  | Updated Table 8-4 to remove targets for 2023 and 2024 for AI-12.       |

| Revisions in 2023-2025 Base WMP Revision 6  |   |  |
|---|---|--|
| Section   | Correction or Clarification   | PacifiCorp Revision  |
| Section 8.1.2.12 Expulsion Fuse Replacements Section 8.1.4 Equipment Maintenance and Repair | The 2025 WMP Update Guidelines require that the 2023-2025 Base WMP reflect all reportable updates. 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. PacifiCorp must reflect the correct completion date for the Expulsion Fuse Replacement initiative (ID# GH-05) throughout its WMP.  | Updated completion date for GH-05.   |
| Section 8.2.1.2 Targets   | 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> PacifiCorp must remove these updates from its 2023-2025 Base WMP.  | Updated targets for VM-05, VM-01, and VM-02 have been removed.   |
| Overall   | <p>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:</p> <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) The original text from PacifiCorp's 2023-2025 Base WMP R235 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). The original text from PacifiCorp's 2023-2025 Base WMP R237 is not indicated as removed (e.g., in strikeout).</li> <li>· "Table PAC 7-2 PacifiCorp Mitigations" is not properly redlined." Text changes from PacifiCorp's 2023-2025 Base WMP R2 as not properly reflected. For example: <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>o 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>o 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> </ul> </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>o 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>o 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>o GH-12 is a completely new initiative, yet the row is not shown in redline at all.</li> </ul> </li> <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</li> </ul> | PacifiCorp has made the updates identified by Energy Safety and made its best attempts to redline proposed new text or strike out proposed text for removal. |

| Revisions in 2023-2025 Base WMP Revision 6 |  |                     |
|--|--|---------------------|
| Section                                    | Correction or Clarification  | PacifiCorp Revision |
|  | indicated in redline (e.g., underlined)".41<br>As required in Energy Safety's Rejection and Order to Resubmit for the PacifiCorp 2025 Wildfire Mitigation Plan Update, all 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).42<br>As required in Energy Safety's Rejection and Order to Resubmit for the PacifiCorp 2025 Wildfire Mitigation Plan Update, all 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 strikeout or underline). |                     |

If you have any questions regarding this request, please contact Pooja Kishore, Regulatory Affairs Manager at (503) 813-7314.

Sincerely,



Matthew McVee  
Vice President, Regulatory Policy and Operations

cc: [Frank.Bigelow@fire.ca.gov](mailto:Frank.Bigelow@fire.ca.gov)  
[Jeff.Fuentes@fire.ca.gov](mailto:Jeff.Fuentes@fire.ca.gov)  
[CALFIREUtilityFireMitigationUnit@fire.ca.gov](mailto:CALFIREUtilityFireMitigationUnit@fire.ca.gov)  
[Caroline.ThomasJacobs@energysafety.ca.gov](mailto:Caroline.ThomasJacobs@energysafety.ca.gov)  
[safetypolicy@energysafety.ca.gov](mailto:safetypolicy@energysafety.ca.gov)  
[Shannon.ORourke@energysafety.ca.gov](mailto:Shannon.ORourke@energysafety.ca.gov)  
[Brian.Bishop@energysafety.ca.gov](mailto:Brian.Bishop@energysafety.ca.gov)  
[Lucy.Morgans@energysafety.ca.gov](mailto:Lucy.Morgans@energysafety.ca.gov)  
[Melissa.Semcer@energysafety.ca.gov](mailto:Melissa.Semcer@energysafety.ca.gov)  
[Koko.Tomassian@energysafety.ca.gov](mailto:Koko.Tomassian@energysafety.ca.gov)

[Stephen.Lai@energysafety.ca.gov](mailto:Stephen.Lai@energysafety.ca.gov)

[Edward.Chavez@energysafety.ca.gov](mailto:Edward.Chavez@energysafety.ca.gov)

[MaryBeth.Farley@energysafety.ca.gov](mailto:MaryBeth.Farley@energysafety.ca.gov)

[Leslie.Palmer@cpuc.ca.gov](mailto:Leslie.Palmer@cpuc.ca.gov)

[Matthew.Yunge@cpuc.ca.gov](mailto:Matthew.Yunge@cpuc.ca.gov)

[Carolyn.Chen@cpuc.ca.gov](mailto:Carolyn.Chen@cpuc.ca.gov)

[Matthew.Karle@cpuc.ca.gov](mailto:Matthew.Karle@cpuc.ca.gov)

[Charles.Madison@cpuc.ca.gov](mailto:Charles.Madison@cpuc.ca.gov)

[CalAdvocates.WildfireDiscovery@cpuc.ca.gov](mailto:CalAdvocates.WildfireDiscovery@cpuc.ca.gov)