

OEIS Data Request 7.1

Regarding changes in Maturity Survey responses between the 2023 and 2024 surveys – Section 4.1.2: In its 2024 survey response to question 4.1.2.Q1, PacifiCorp responded “No” for 2025 and 2026. However, in its 2023 survey response to the same question, PacifiCorp responded “Yes.” Similarly, in its 2024 survey response to question 4.1.2.Q7, PacifiCorp responded “No” for 2026, despite responding “Yes” in its 2023 survey response.

- (a) Explain why PacifiCorp changed its responses to these questions from “Yes” in the 2023 survey to “No” in the 2024 survey.
- (b) Discuss whether the capabilities described in these questions are expected to be included in the new GeoDigital database PacifiCorp plans to roll-out in Q1 2025.
 - i. If yes, clarify why the Maturity Survey responses indicate the database will not contain this information.
 - ii. If no, explain why these capabilities will not be included in PacifiCorp’s database.

Response to OEIS Data Request 7.1

- (a) Through the implementation of the GeoDigital work management software and with a fuller understanding of the capabilities of the solution, PacifiCorp now understands that the resultant database does not treat individual trees as “assets” with unique identifiers, which would be needed in order to develop an inventory and maintenance history of all trees within strike distance of electrical infrastructure. When implemented, GeoDigital database or work management software will contain information based on the inspection conducted within the calendar year and work completed. The database will contain a history of work conducted and where it was conducted, however it will not maintain an individual work history for each tree inspected.
- (b) No. Data described in PacifiCorp’s response to 4.1.2 Q1 and Q7 of the 2024 maturity survey will not be included in the GeoDigital database which PacifiCorp plans to roll-out in Q1 2025.
 - i. Not applicable.
 - ii. Upon reassessment of GeoDigital capabilities, the database is not designed as an asset management database. In other words, it is not configured to track each individual tree over time, nor retain a work history for each individual tree.

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Regarding changes in Maturity Survey responses between the 2023 and 2024 surveys – Section 4.1.3: In its 2024 survey responses to questions 4.1.3.Q3, 4.1.3.Q4, and 4.1.3.Q5, PacifiCorp responded “No” for 2025 and 2026. However, in its 2023 survey responses to the same questions, PacifiCorp responded “Yes”.

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- (a) Provide details as to why the responses to these questions changed from “Yes” in the 2023 survey to “No” in the 2024 survey.
- (b) Discuss whether the practices described in these questions are expected to be implemented with the new GeoDigital database PacifiCorp plans to roll-out in Q1 2025.
 - i. If yes, clarify why the Maturity Survey responses indicate these practices are not in place.
 - ii. If no, describe how PacifiCorp plans to assess and understand strengths and weaknesses of its data and data collection process(es).

Response to OEIS Data Request 7.2

- (a) Responses have been updated to reflect the Company’s current understanding of the functionality of the GeoDigital work management software being implemented. In 2023, the survey responses were based on the capabilities of the work management software in use at the time.
- (b) No. The practices described in the Company’s response to 4.1.3.Q3-Q5 of the 2024 maturity survey are not expected to be part of the functionality of the GeoDigital work management system being implemented in Q1 2025.
 - i. Not applicable.
 - ii. After implementation of GeoDigital, PacifiCorp will assess the database to determine appropriate actions in this regard.

OEIS Data Request 7.3

Regarding changes in Maturity Survey responses between the 2023 and 2024 surveys – Section 4.2.1: - In its 2024 survey response to question 4.2.1.Q4, PacifiCorp responded “No” for 2025 and 2026. However, in its 2023 survey response to the same question, PacifiCorp responded “Yes.” Similarly, in its 2024 survey response to question 4.2.1Q5, PacifiCorp responded “No” for 2026, despite having responded “Yes” in its 2023 survey response.

- (a) Provide details as to why the responses to these questions changed from “Yes” in the 2023 survey to “No” in the 2024 survey.
- (b) Describe PacifiCorp’s process beyond what is currently stated in its WMP (e.g., “PacifiCorp sequences distribution circuits to be inspected, while considering factors including HFRA, HFTD 2 or 3 Tier, when last scheduled work took place, knowledge

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of tree conditions, predominant species/growth rate, environmental factors”) for determining inspection frequency.

- (c) Is any part of the HFTD inspected at least twice per year? If so, what factors determine the need for those areas to be inspected more than once per year?

Response to OEIS Data Request 7.3

- (a) Upon further review, PacifiCorp updated responses to reflect current practices. PacifiCorp is reviewing its inspection practices and does not currently have plans for increased inspection frequency conducted by vegetation management.
- (b) When implementing a cycle-based vegetation management program, consistency of implementation is an important aspect. PacifiCorp may also conduct additional reactive inspections in response to outages and environmental or weather-related conditions, thereby temporarily increasing inspection frequency.
- (c) PacifiCorp’s vegetation management program inspects vegetation along powerlines in the high fire threat district (HFTD) annually. However, lines are inspected through other wildfire mitigation plan (WMP) initiatives and PacifiCorp maintenance activities beyond vegetation management, including inspections conducted by Operations personnel and third-party contractors, where vegetation conditions may be noted. In addition, though the vegetation management department may conduct one scheduled inspection, vegetation along power lines is reviewed multiple times as follows:
1. Pre-inspection: initial inspection of vegetation.
 2. Tree crews conduct work and review vegetation in the area to address anything that was missed or if conditions changed since inspection.
 3. Tree Contractor general foreperson conducts quality control review of work and to identify missed work or if conditions have changed. This review will be more effectively tracked with the implementation of GeoDigital.
 4. PacifiCorp conducts a targeted 100 percent post-audit of all line miles to identify any additional work needed and confirmation of work conducted.

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Regarding changes in Maturity Survey responses between the 2023 and 2024 surveys – Section 4.2.3: - In its 2024 survey responses to questions regarding frequency of subject matter expert assessment of vegetation inspections (4.2.3.Q1, Q3, and Q4),

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PacifiCorp responded “No” for 2024, 2025, and 2026. However, in its 2023 survey responses to the same questions, PacifiCorp responded “Yes” for 2023, 2024, 2025, and 2026.

- (a) Provide details as to why PacifiCorp’s responses to these questions changed from “Yes” in the 2023 survey to “No” for the 2024 survey.
- (b) Was PacifiCorp previously having a subject matter expert assess vegetation inspections at least annually?
 - i. If yes, why did an at least annual inspection stop?
 - ii. If no, why did PacifiCorp’s previous responses indicate yes?
- (c) If subject matter experts are still assessing vegetation inspections, clarify the frequency.
 - i. If not, describe any other review/assessment of vegetation inspections and their frequency.

Response to OEIS Data Request 7.4

- (a) Upon reassessment of questions 4.2.3 Q1, Q2, and Q4 of the 2024 maturity survey, **PacifiCorp adjusted its responses in the 2024 maturity survey based on a more stringent interpretation of the survey questions and PacifiCorp’s ability to provide supporting documentation.** PacifiCorp’s post-audit program is largely focused on reviewing completed tree work and verifying whether or not additional work is needed. These audits take place after the completion of tree work. At this time, PacifiCorp does not have a specific detailed program that assesses pre-inspection, however to a degree, the pre-inspection is reviewed during the post-audit as work that is missed or prescribed incorrectly may be identified. PacifiCorp may also conduct sample reviews of pre-inspection prior to tree work being completed, however these activities are not part of a written quality assurance (QA) / quality control (QC) program. As such, PacifiCorp revised its response to these survey questions.
- (b) Yes:
 - i. As stated in the Company’s response to subpart (a) above, inspections are assessed, however at this time, PacifiCorp does not have a formal program to review pre-inspection with targets and goals similar to its post-audit program. There has been no change to the program but rather a more stringent interpretation of the survey questions and PacifiCorp’s ability to provide supporting documentation.
 - ii. Not applicable.

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- i. Vegetation inspections are reviewed during post-audits as stated in the Company's response to subpart (a) above, and reviews are conducted at random typically during the beginning of the year until PacifiCorp vegetation management personnel shift focus to post-auditing completed tree work.

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Regarding changes in Maturity Survey responses between the 2023 and 2024 surveys – Section 4.2.4 and 4.3.4: – In its 2024 survey responses to questions regarding risk reduction and prioritization (4.2.4.Q1, Q2, and Q3; and 4.3.4.Q1), PacifiCorp responded “No,” for 2024, 2025, and 2026. However, in its 2023 survey response to the same questions, PacifiCorp responded “Yes” for 2024, 2025, and 2026 for 4.2.4.Q1; for 2025 and 2026 for 4.2.4.Q2; for 2026 for 4.2.4.Q3; and for 2025 and 2026 for 4.3.4.Q1.

- (a) Provide details as to why the responses to the indicated questions changed from “Yes” in the 2023 survey to “No” in the 2024 survey. Specifically:
 - i. Did PacifiCorp previously use risk buy-down estimates to prioritize inspection programs and frequency, to plan vegetation treatment, or to estimate the risk buy-down of inspections or initiatives?
 1. If yes, why did this risk buy-down estimate stop?
 2. If no, why did PacifiCorp's 2023 responses indicate yes?
- (b) Does PacifiCorp have any procedures in place for prioritizing certain areas/circuits within the HFTD or prioritizing certain inspection programs?
 - iii. If yes, describe these processes/procedures.
 - iv. If no, does PacifiCorp have plans to develop any such processes/procedures?
- (c) How does PacifiCorp plan vegetation treatment if not based on risk buy-down estimates?

Response to OEIS Data Request 7.5

- (a) Please refer to the Company's response to subpart i. below:
 - i. No. PacifiCorp did not previously use risk buy-down estimates to prioritize inspection programs and frequency.
 1. Not applicable.

2. Upon reassessment, PacifiCorp determined that the current plan is not fully scoped to allow for responses to these questions.

(b) No.

- i. Not applicable.

- ii. PacifiCorp's vegetation management department does not have written procedures in place for prioritizing areas within high fire threat districts (HFTD) for inspection beyond what is stated within the wildfire mitigation plan (WMP). PacifiCorp foresters consider environmental factors, the last time the circuit was worked, fire threat areas (e.g. HFTD Tier 3 prioritized above other areas), and other factors when scheduling circuits for inspection within HFTD. PacifiCorp does not currently have plans in place to formalize this work practice.

(c) PacifiCorp's vegetation management program is currently an inspection cycle-based program. As such powerlines are inspected and worked according to the cycle schedule and augmented through other work activities and WMP initiatives, such as increased inspections within HFTD to identify and address risk.

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Regarding changes in Maturity Survey responses between the 2023 and 2024 surveys – Section 4.3.2 – In its 2024 survey responses to questions 4.3.2.Q3 and 4.3.2.Q4, PacifiCorp responded greater than 30 days and less than or equal to 7 days, respectively, for 2024, 2025, and 2026. However, in its 2023 survey response to the same questions, PacifiCorp responded with shorter response times.

(a) Provide details as to why PacifiCorp's responses to these questions changed. Specifically:

- i. Did PacifiCorp previously respond to inspection findings more quickly than it currently anticipates it will for the future?

1. If yes, why will response times increase?

2. If no, why did PacifiCorp's 2023 survey responses indicate shorter response times?

(b) Describe any plans PacifiCorp has to reduce response time to inspection findings.

Response to OEIS Data Request 7.6

(a) Please refer to the Company's response to subpart i. below:

i. No.

1. Not applicable.
2. **PacifiCorp updated responses based on ability to provide supporting documentation** and to reflect current practices in addition to the current interpretation of the question (focusing on routine maintenance). With respect to routine maintenance, PacifiCorp generally addresses vegetation conditions identified through pre-inspection six to eight weeks after pre-inspection. Conducting pre-inspection well in advance of tree crews conducting the work allows for flexibility for contractors regarding resource planning and forecasting.

PacifiCorp revised its response regarding severe conditions as response timeframes varies based on corrective action needed. In general, vegetation management responds to the condition immediately, however full corrective actions may take longer depending on conditions present. If vegetation management response may not be fully implemented, temporary measures may be taken, and line de-energization may be requested on a case-by-case basis until permanent vegetation corrective actions implemented.

- (b) In conjunction with the GeoDigital implementation, PacifiCorp is developing a work prioritization methodology that will provide more vision into vegetation conditions and timeframe between corrective action. PacifiCorp anticipates that this will allow for better oversight for certain conditions, such as imminent conditions.

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Regarding changes in Maturity Survey responses between the 2023 and 2024 surveys – Section 4.3.3 - In its 2024 survey responses to question 4.3.3.Q4, PacifiCorp responded “No” for 2024, 2025, and 2026. However, in its 2023 survey response to the same question, PacifiCorp responded “Yes” for all years.

- (a) Provide details as to why the responses to this question changed from the 2023 survey to the 2024 survey. Specifically:
- i. Did PacifiCorp previously have plans to update procedures based on deficiencies identified from QA/QC information at least annually?
 1. If yes, why did these plans change?
 2. If no, why did PacifiCorp’s 2023 survey responses indicate yes?

- (b) What processes, if any, does PacifiCorp have in place for updating inspection procedures, if not based on QA/QC information?
- (c) How does PacifiCorp use QA/QC information if not for updating inspection procedures?

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- (a) Please refer to the Company's response to subpart i. below:
 - i. No.
 - 1. Not applicable.
 - 2. PacifiCorp practices have not changed from the 2023 survey, however the Company's response to the question has been revised based on current interpretation of the **question and ability to provide written supporting documentation**. Beyond high-level information within PacifiCorp's standard operating procedures, at this time, PacifiCorp does not have formal procedures for pre-inspection. PacifiCorp does not dictate to its contractors how to conduct inspections, but rather provides its contractors with specifications to inspect against.
- (b) Pre-inspection procedures are not dictated to vendors, however, when quality assurance (QA) / quality control (QC) issues are identified, PacifiCorp reviews them with the applicable inspection contractor to address the issues and minimize recurrence of the issue. Therefore, although written procedures may not be revised, the inspection methods implemented by the inspection contractor are always being refined and scrutinized and PacifiCorp expectations shared.
- (c) Please refer to the Company's responses to subparts (a) and (b) above.

OEIS Data Request 7.8

Requirement for Type 2 Changes to Approved Targets, Objectives, and Expenditures– Requirement for Type 2 Changes to Approved Targets, Objectives, and Expenditures The 2025 WMP Update Guidelines, Type 2 Changes to Approved Targets, Objectives, and Expenditures,¹ require that "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." For every Type 2 update requested in PacifiCorp's 2025 WMP Update,² specify which

¹ 2025 WMP Update Guidelines, p. 13
(<https://efiling.energy.ca.gov/eFiling/Getfile.aspx?fileid=56254&shareable=true>, accessed Oct. 10, 2024).

² PacifiCorp 2025 WMP Update R1 (redlined) (Sep. 20, 2024), pp. 16-23
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justification it falls into. PacifiCorp may provide additional explanatory text for each requested update if desired.

- (a) Lessons learned;
- (b) Internal policy changes;
- (c) New laws or regulations;
- (d) Corrective actions resulting from Energy Safety's compliance process, or
- (e) Other.

Response to OEIS Data Request 7.8

Please refer to Attachment OEIS 7.8-1 which provides Table 8-1 listing the reasons for changes to initiative objectives with narrative explanation for the change.

Please refer to Attachment OEIS 7.8-2 which provides Table 8-2 listing the reasons for changes to the forecasted completion date with narrative explanation for the change.

Please refer to Attachment OEIS 7.8-3 which provides Table 8-3 listing the reasons for changes to expenditures with narrative explanation for the change.

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Smoke and Air Quality Sensors (ID# SA-03) Discrepancies and Discontinued Program

- In PacifiCorp's 2025 WMP Update R1, Table PAC 4-1 and the accompanying text state that the Smoke and Air Quality Sensors initiative (ID# SA-03) is a discontinued program. PacifiCorp's 2023-2025 Base WMP R5 Table 8-21 shows an "Ending in 2024" completion date. Section 8.3.1.2 "Targets," shows SA-03 to have a target of 20 sensors for 2023. In Section 8.3.4.1 "Existing Ignition Detection Sensors and Systems" the text for SA-03 states that, "The technology is still being developed and is not currently at a stage for implementation. The current installed sensor will be removed, and the program will not continue further".

- i. What date did the Smoke and Air Quality Sensors program (ID# SA-03) end?
- ii. How many sensors were deployed in 2023?
- iii. How many sensors were deployed in 2024?
- iv. How many sensors have been removed through September 2024?

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57396&shareable=true>, accessed Oct. 10, 2024).

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- v. Why did PacifiCorp not provide a reportable update for SA-03 in Table PAC 2-2 “Changes to Initiative Objectives from Forecasted Completion Date” given that PacifiCorp changed the objective’s completion date?

Response to OEIS Data Request 7.9

- i. The program ended December 31, 2023.
- ii. 20.
- iii. None.
- iv. None.
- v. The reportable update is provided in PacifiCorp’s 2025 Wildfire Mitigation Plan (WMP) Update in Table PAC 4.1 under discontinued programs.