



January 21, 2025

Allen Berreth  
Vice President of Transmission & Distribution Operations  
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Portland, OR 97232

## NOTICE OF VIOLATION

Mr. Berreth:

Pursuant to Public Utilities Code section 326 and Government Code section 15475.1, the Office of Energy Infrastructure Safety (Energy Safety) has conducted an inspection of work completed by PacifiCorp (PC) in accordance with its 2024 Wildfire Mitigation Plan (WMP) and determined the existence of a violation. Energy Safety therefore issues PC a Notice of Violation (NOV), identifying noncompliance with an approved WMP or any law, regulation, or guideline within the authority of the Office.<sup>1</sup>

On September 10, 2024, Energy Safety conducted an inspection of PC's WMP initiatives in the vicinity of the city of Yreka, California. The inspection report is enclosed herewith. Energy Safety found the following violation(s):

Violation 1. Energy Safety observed that in implementing 2024 WMP initiative 8.1.2.12 - Expulsion Fuse Replacement, PC failed to provide accurate data in reporting that expulsion fuses were replaced on Pole ID 06245007.0226445, Grid Hardening ID 7032082, at coordinates 41.734689, -122.638854.

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<sup>1</sup> Cal. Code Regs., tit. 14, section 29302(b)(2)

## Response Options

Energy Safety may prescribe a timeframe for resolution of a violation associated with the assigned risk category.<sup>2</sup> Within 30 days from the issuance date of this NOV, the electrical corporation must provide a response advising Energy Safety of corrective actions taken or planned to remedy the above identified violation(s) and prevent recurrence. Alternatively, the electrical corporation must advise Energy Safety that it will not correct the violation, including the reasoning or justification for inaction and all supporting documentation.<sup>3</sup>

This response shall be filed in the Energy Safety e-Filing system under the 2024 NOV Docket<sup>4</sup> and the associated file name(s) must begin with the NOV identification number provided above.

Pursuant to Government Code section 15475.4, if the electrical corporation intends to request a hearing “to take public comment or present additional information,” it must also do so within the 30-day timeframe. If a petition for hearing is not received by the deadline, then the determination and conditions set forth in this NOV become final.

Prior to its response or request for hearing, the electrical corporation may also request an informal conference with Energy Safety’s Compliance Assurance Division for the purpose of disputing any issues raised in this NOV no later than five (5) business days before the response deadline.<sup>5</sup> Requests for informal conference with Energy Safety must be e-mailed to [compliance@energysafety.ca.gov](mailto:compliance@energysafety.ca.gov), with a copy sent to all Energy Safety Compliance Assurance Division staff identified in the NOV.

Pursuant to Public Utilities Code section 8389(g), following receipt of the electrical corporation’s response to this NOV and resolution of any disputes, this matter may be referred to the California Public Utilities Commission for its consideration of potential enforcement action, as it deems appropriate.

Sincerely,



Patrick Doherty  
Program Manager | Compliance Assurance Division  
Office of Energy Infrastructure Safety  
[Patrick.Doherty@energysafety.ca.gov](mailto:Patrick.Doherty@energysafety.ca.gov)

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<sup>2</sup> Energy Safety Compliance Guidelines, pp. 3

<sup>3</sup> Energy Safety Compliance Guidelines, pp. 4-5

<sup>4</sup> <https://efiling.energysafety.ca.gov/EFiling/DocketInformation.aspx?docketnumber=2024%20NOV>

<sup>5</sup> Energy Safety Compliance Guidelines, p. 4

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# INSPECTION REPORT

## Overview

### Inspection Categories

The Office of Energy Infrastructure Safety (Energy Safety) conducts inspections to verify the work performed by an electrical corporation as reported in an approved Wildfire Mitigation Plan (WMP) or subsequent filing, and to assess general conditions of electrical infrastructure that may adversely impact an electrical corporation’s wildfire risk.

A Notice of Violation (NOV) is issued for any instances of noncompliance discovered during an inspection related to an electrical corporation’s execution of its WMP initiatives.

### Correction Timelines

Violations must be corrected in a timely manner. Energy Safety may prescribe a timeframe for resolution of a violation. If Energy Safety assigns a risk category to a violation, an electrical corporation must correct the violation as required per the timelines provided in Table 1.<sup>6</sup>

**Table 1. Risk Category and Correction Timelines**

Risk Category	Violation and defect correction timeline
Severe	<ul style="list-style-type: none"><li>• Immediate resolution</li></ul>
Moderate	<ul style="list-style-type: none"><li>• 2 months (in High Fire Threat District (HFTD) Tier 3)</li><li>• 6 months (in HFTD Tier 2)</li><li>• 6 months (if relevant to worker safety; not in HFTD Tiers 2 or 3)</li></ul>
Minor	<ul style="list-style-type: none"><li>• 12 months or resolution scheduled in WMP update</li></ul>

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<sup>6</sup> Energy Safety Compliance Guidelines, p. 3



# Inspection Summary

Table 2 provides a summary of the selection of the WMP inspection location and initiative. Table 3 provides a summary of the violation(s) found during the inspection. Details regarding the inspection that identified the violation(s) are provided in the Inspections Details Section below.

***Table 2: Inspection Location and Initiative Summary***

Electrical Corporation:	PacifiCorp
Report Number:	CAD_PC_CAC17_20240910_1320
Inspector:	CAC17
WMP Year Inspected:	2024
Quarterly Data Report (QDR) Referenced:	Quarter 1 (Q1)
Inspection Selection:	Energy Safety viewed the contents of the Q1 QDR and performed an analysis that resulted in the selection of the WMP initiatives and locations referenced in this report.
Relevant WMP Initiative:	8.1.2.12 Expulsion Fuse Replacements
Date of inspection:	September 10, 2024
City and County of Inspection:	Yreka, Siskiyou County
Inspection Purpose:	Assess the accuracy of PacifiCorp’s QDR data, completeness of its work, compliance with WMP requirements, and compliance with its protocols.

**Table 3: WMP Inspection Violation(s)**

Violation #	Structure ID	Grid Hardening ID	Lat/Long	HFTD	Initiative Number	Violation Type	Severity	Violation Description
Violation 1	06245007.0226445	7032082	41.734689, -122.638854	Non-HFTD	8.1.2.12 Expulsion Fuse Replacements	Data Accuracy	N/A	Inaccurate data provided on expulsion fuse replacement.

# Inspection Details

## **Violation 1:**

### **Relevant Requirement:**

PC's WMP states the following regarding initiative number 8.1.2.12 Expulsion fuse replacement:

1. "Pacific Power is completing replacement of expulsion fuses concurrent with line rebuild where practical to utilize resources most efficiently. Expedited replacement of expulsion fuses is planned on lines where covered conductor is planned..."<sup>7</sup>

Version 3.1 of Energy Safety's Data Guidelines states the following with respect to data submitted by an electrical corporation when reporting on its 2023 WMP initiatives:

2. "Electrical corporations must ensure location accuracy in their [geographic information system (GIS)] data submissions..."<sup>8</sup>

### **Finding:**

On Pole ID 06245007.0226445, Grid Hardening ID 7032082, at 300-320 Pine St, Yreka, CA, 96097, USA, 41.734689, -122.638854, the inspector observed that expulsion fuses were replaced on the branch lines but not the transformer. The inspector's observation is documented in Violation 1 photographs, which are attachments to this report. Photo numbers Item1GIimg1, Item1IA1img2, and Item1IA1img3 depict non-exempt expulsion fuses.

Energy Safety concludes that:

1. PacifiCorp's 2024 WMP Expulsion fuse replacement (8.1.2.12) work was identified as complete at this location.
2. An expulsion fuse was not replaced.

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<sup>7</sup> PacifiCorp, "2023-25 Approved Wildfire Mitigation Plan," February 2, 2024, p. 145. [Online]. Available: <https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56336&shareable=true>

<sup>8</sup> Office of Energy Infrastructure Safety, "Data Guidelines, Version 3.1," February 17, 2023, p. 10. [Online]. Available: <https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53475&shareable=true>

# Exhibits

Exhibit A: Photo Log

Structure ID: 06245007.0226445

Violation 1

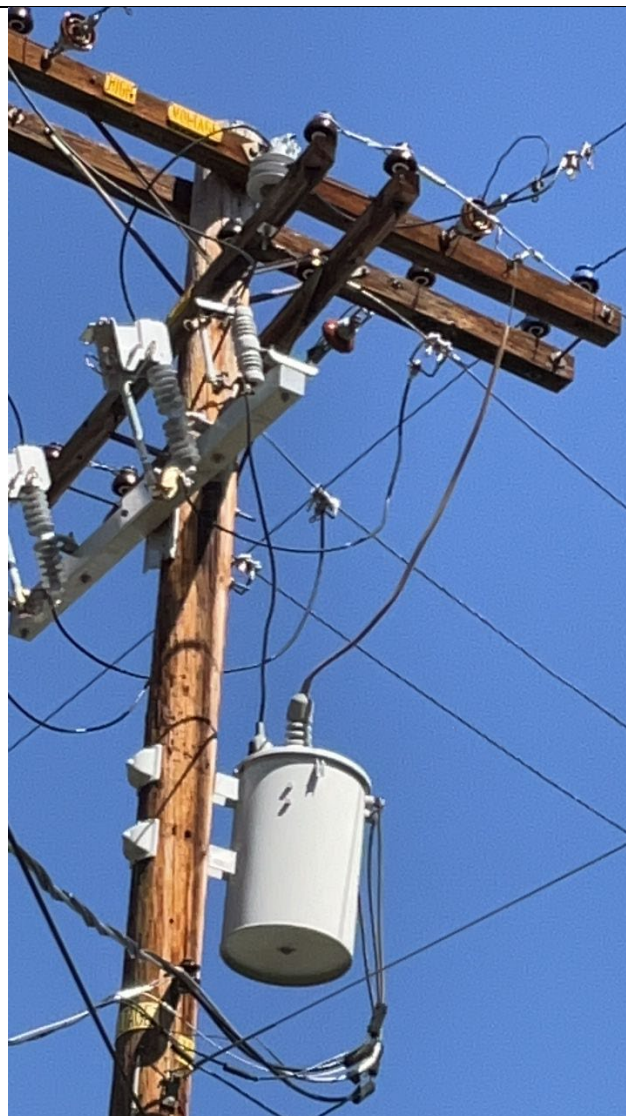


Item1GImg1: Pole ID





**Item1IA1Img2:** Three Exempt Non-Expulsion Branch Line Fuses and One Non-Exempt Expulsion Fuse to Transformer



**Item1IA1Img3:** Non-Exempt Expulsion Fuse to Transformer