

OEIS Data Request 12.1

Regarding PacifiCorp’s reasons for its changes in wildfire mitigation maturity between 2023-2024: Energy Safety issued data requests OEIS-P-WMP_2024-PC-07 and OEIS-P-WMP_2024-PC-09 to inquire about PacifiCorp’s changes in its 2024 Maturity Survey responses, which showed a decrease in projected maturity for 2025 and 2026. Energy Safety held a meeting with PacifiCorp on January 7, 2025, to clarify portions of its responses to OEIS-P-WMP_2024-PC-09. During this meeting PacifiCorp repeatedly communicated to Energy Safety that PacifiCorp took a more conservative approach to responding to questions in 2024 compared to 2023. PacifiCorp stated that if it lacked a formal processes, governance, and/or documentation to support its answer, it changed its response from “Yes” in 2023 to “No” in 2024. The explanation provided during the January 7, 2025, meeting does not often align with PacifiCorp’s written responses to OEIS-P-WMP_2024-PC-07 and -09.

- (a) PacifiCorp is asked to amend its responses to OEIS-P-WMP_2024-PC-07 and -09, as needed, to provide the context discussed during the January 7, 2025, meeting. Provide any amended responses in redline.
- (b) In its amended responses, where applicable, PacifiCorp must separately indicate Maturity Survey questions were impacted by an absence of formal processes, governance, and documentation prompting PacifiCorp to answer “No” in 2024.

1st Supplemental Request received from the Office of Energy Infrastructure Safety on February 5, 2025 - To provide clarification on PacifiCorp’s approach to the Maturity Surveys:

PacifiCorp’s response to OEIS-P-WMP_2024-PC-12, Question 1, repeatedly stated that it, “will provide ‘Yes’ responses when it is able to support a ‘Yes’ response with documentation, approved project or program plans, or other materials that provide evidence of the actual or planned completion of the maturity survey milestone”.

PacifiCorp’s response to OEIS-P-WMP_2024-PC-12, Question 3, stated, “PacifiCorp expects its approach to the 2025 Maturity Survey to be similar to its approach to the 2024 survey under which a “Yes” response indicates that the maturity survey milestone is or will be achieved and that supporting documentation or evidence is or will be available to demonstrate completion”.

- (a) Can PacifiCorp clarify what a “Yes” response to the 2025 Maturity Survey will indicate?
- (b) Can PacifiCorp clarify the two responses?

1st Supplemental Response to OEIS Data Request 12.1

Further to the Company's response to OEIS Data Request 12.1 dated January 21, 2025, and to the supplemental request received from the Office of Energy Infrastructure Safety (OEIS) on February 5, 2025, the Company responds as follows:

- (a) For the 2025 survey, a "Yes" response will indicate:
- The Company has achieved maturity and has proof it has been achieved, or
 - The Company is progressing on maturity and there is an approved plan for the project or program and milestones that indicate when there will be proof that the maturity has been achieved.
- (b) Please refer to the Company's response to subpart (a) above regarding the 2025 survey.

OEIS Data Request 12.2

Regarding expectations for responding “Yes” to Maturity Survey questions:

PacifiCorp must state when it expects to have sufficient formal processes, governance, and documentation to respond “Yes” to Maturity Survey questions for areas where it expects to mature.

1st Supplemental Request received from the Office of Energy Infrastructure Safety on February 5, 2025 - In OEIS-P-WMP_2024-PC-12 Question 2, Energy Safety asked, “PacifiCorp must state when it expects to have sufficient formal processes, governance, and documentation to respond “Yes” to Maturity Survey questions for areas where it expects to mature”. PacifiCorp responded, “PacifiCorp acknowledges this expectation from Energy Safety”. Can PacifiCorp clarify its response to enable Energy Safety to better gauge PacifiCorp’s projected maturity?

1st Supplemental Response to OEIS Data Request 12.2

Further to the Company’s response to OEIS Data Request 12.2 dated January 17, 2025 and to the supplemental request received from the Office of Energy Infrastructure Safety (OEIS) on February 5, 2025, the Company responds as follows:

With regard to the timing of when PacifiCorp’s progression of maturity in its response to OEIS-P-WMP-2025-PC-07 and OEIS-P-WMP-2025-PC-09, the Company responds as follows:

OEIS-P-WMP-2025-PC-07:

- **Vegetation Management** – Unless otherwise stated in the Company’s response to OEIS-P-WMP_2024-PC-07, PacifiCorp does not have documented plans detailing changes to database/inventory development, changed to inspection frequency, transitioning to risk-based pruning based on modeled growth rates, inspections reviews, and quality assurance (QA) / quality control (QC) reviews.

OEIS-P-WMP-2025-PC-09:

- **Asset Inspections and Corrections** – PacifiCorp does not have any plans at this time for any initiatives to change current asset inspections or maintenance and repair practices or activities.
- **Asset Risk** - PacifiCorp has implemented processes, governance, and documentation protocols to enable “Yes” responses in future maturity survey responses related to long-term, asset-based wildfire risk modeling as project plans are approved or work is completed. Where the Company is dependent on the third-party vendor roadmap on functionality to progress, PacifiCorp will provide

updates to future maturity surveys when the vendor provides an updated roadmap.

- **Protective Equipment and Device Settings** – As stated in the Company's response to OEIS-P-WMP_2024-PC-09, new functionality is expected to be available in 2026.
- **Meteorology/Situational Awareness** – PacifiCorp expects to have completed the work and proof of completion of the work on weather forecast ensembles and linkage of ignition likelihood estimation to ensemble weather forecasts (2024 Maturity Survey Section Questions 2.1.1 Q6 and 2.2.5 Q5) in Q1 2026.
- **Best Practice Sharing with Other Electrical Corporations** – PacifiCorp has no plans at this time to develop standard procedures regarding exchanging best practices and lessons learned with other utilities.

OEIS Data Request 12.3

Regarding PacifiCorp’s approach to answering the 2025 Maturity Survey: For the 2025 Maturity Survey, describe the approach PacifiCorp expects to take in answering the survey questions (e.g., more conservative, similar to its approach in the 2024 survey; or less conservative, similar to its approach in 2023; other).

1st Supplemental Request received from the Office of Energy Infrastructure Safety on February 5, 2025 - To provide clarification on PacifiCorp’s approach to the Maturity Surveys:

PacifiCorp’s response to OEIS-P-WMP_2024-PC-12, Question 1, repeatedly stated that it, “will provide ‘Yes’ responses when it is able to support a ‘Yes’ response with documentation, approved project or program plans, or other materials that provide evidence of the actual or planned completion of the maturity survey milestone”.

PacifiCorp’s response to OEIS-P-WMP_2024-PC-12, Question 3, stated, “PacifiCorp expects its approach to the 2025 Maturity Survey to be similar to its approach to the 2024 survey under which a “Yes” response indicates that the maturity survey milestone is or will be achieved and that supporting documentation or evidence is or will be available to demonstrate completion”.

- (a) Can PacifiCorp clarify what a “Yes” response to the 2025 Maturity Survey will indicate?
- (b) Can PacifiCorp clarify the two responses?

1st Supplemental Response to OEIS Data Request 12.3

Further to the Company’s response to OEIS Data Request 12.3 dated January 17, 2025, and to the supplemental request received from the Office of Energy Infrastructure Safety (OEIS) on February 5, 2025, the Company responds as follows:

Please refer to the Company’s 1st Supplemental response to OEIS Data Request 12.1.