

**BEFORE THE OFFICE OF ENERGY INFRASTRUCTURE SAFETY
OF THE STATE OF CALIFORNIA**

Office of Energy Infrastructure Safety
Natural Resources Agency

**COMMENTS OF THE GREEN POWER INSTITUTE
ON THE DRAFT DECISION ON PACIFICORP UTILITIES
2025 WILDFIRE MITIGATION PLAN UPDATE**

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The Green Power Institute (GPI), the renewable energy program of the Pacific Institute for Studies in Development, Environment, and Security, provides these *Comments of the Green Power Institute on the Draft Decision on PacifiCorp Utilities 2025 Wildfire Mitigation Plan Update*.

GPI reviewed the Draft Decision on PacifiCorp Utilities 2025 Wildfire Mitigation Plan Update (WMP), issued on January 27, 2025. We provide comments on the following topics roughly in order of Draft Decision contents:

- Eliminate PC-25U-01 due to specificity and nuance in D.25-01-037 and D.20-12-030. Connect directly with CPUC to clarify next steps for all utilities.
- Require PacifiCorp to provide its QA/QC inspection pass rate regardless of whether it increases its pass rate target.
- ACI should not be closed if they are not yet adequately addressed. Failure to address PC-23B-14 and PacifiCorp’s ability to adequately address this ACI in its 2026-2028 Base WMP should be tracked by an ACI.

Comments

Eliminate PC-25U-01 due to specificity and nuance in D.25-01-037 and D.20-12-030. Connect directly with CPUC to clarify next steps for all utilities.

The Draft Decision issues PC-25U-01, which requires PacifiCorp to: “... provide a process outlining how it compares areas in its HFRA to the current HFTD, and provide its plan for submitting proposed changes to the HFTD to the CPUC.”¹ It cites as justification the 2019 WMP review process order for SCE to update its HFTD per D.19-05-038, which led to SCE’s August 2019 submission of a Petition for Modification (PFM) in R.15-05-006, and the ensuing D.20-12-030 approving the PFM, including a portion of SCE’s proposed HFTD update.

¹ PC Draft Decision, p. 12.

However, the HFTD update approved by D.20-12-030 was issued in part because of the methodology employed to generate the HFTD additions. D.20-12-030 includes an assessment of the “high fire risk area” model basis of SCE’s August 2019 PFM, which included a Monte Carlo-based analysis that: “...simulated hundreds of thousands of ignitions at randomly selected points within 100 meters of overhead electric facilities, and was performed by a third-party engineering firm with experience in fire engineering and risk modeling.”² CALFIRE served as the model Independent Review Team (IRT) and: “based its technical review on the same criteria used by the IRT for reviewing proposed changes in the development of the CPUC Fire-Threat Map.”³ This review process resulted in a revised HFTD update, subsequently approved in D.20-12-030.

D.20-12-030 did not simply approve any and all proposed HFTD updates based on just any risk model. The model underlying SCE’s approved HFTD update in 2019-2020 is different from SCE’s and other IOUs’ current wildfire risk planning models. Furthermore, there is no reason to believe that PacifiCorp’s risk planning model third party review process will adequately align with the original HFTD IRT process – raising questions as to whether just any risk planning model, reviewed by any 3rd party review team through an independent process, and the resulting HFRA is eligible for inclusion in the HFTD.

Since then, D.25-01-037 ruled against a PFM that would have allowed Utilities to each apply their own in-house risk model to update the HFTD:

The petition, as modified in Cal Advocates’ reply, requests several departures from the adopted process for developing the High Fire-Threat District boundaries, most significantly to suggest that each IOU’s risk modeling inform the development of the High Fire-Threat District boundaries for their respective territories. Although the petition (as modified) acknowledges and suggests the new process should be consistent with the map development process adopted by D.17-01-009 (as modified by D.17-06-024), it lacks adequate explanation of how the proposed new process would align. As one example, the proposed new process would have each IOU separately file an application for mapping updates in its own service territory and based on its own risk methodology, with subsequent updates to vary between three and six years (for each IOU), whereas the process adopted in D.17-01-009 and D.17-06-024 is necessarily a statewide endeavor... As such, this decision does not find adequate justification to modify the existing approach as proposed by Cal Advocates.⁴

² D.20-12-030.

³ Ibid, p. 5.

⁴ D.25-01-037, p. 13.

D.20-12-030 and D.25-01-037 suggest that eligible updates to the HFTD via R.15-05-006 should, at this time, be derived by model approaches that align with the original HFTD modeling and/or IRT approach, should not be informed by each IOU's individual risk model for their respective territories, and should be a statewide endeavor.

The CPUC Rulemaking to Develop and Adopt Fire-Threat Maps and Fire-Safety Regulations (R.15-05-006) currently lists a status of "Reopened" due to the SCE's pending PFM.⁵ SCE's pending PFM to update its HFTD remains unresolved and was nearly rejected in the most recent Proposed Decision. It remains to be seen whether SCE's PFM to update its HFTD will be approved, and if R.15-05-006 is still slated to be supplanted by a new proceeding as alluded to in the Proposed Decision.⁶ D.20-12-030 and D.25-01-037 and the most recent activity in R.15-05-006 suggests that even if PacifiCorp details a plan for submitting changes to the HFTD to the CPUC, it may be unable to fulfill the HFTD updates. GPI anticipates that a PFM to update PacifiCorp's HFTD based on its own WMP risk planning model, especially without an IRT process akin to the original HFTD map review process, is at high risk of rejection by the CPUC in R.15-05-006.

WMP Decisions must align to CPUC R.15-05-006 Decisions and should consider the nuance of SCE's 2019 PFM wildfire risk area model approach and its CALFIRE IRT process that led to its approved HFTD update—which predate and diverge from the present WMP wildfire risk planning model approaches applied by utilities today. Consequently, GPI recommends revising PC-25U-01 at this time due to the methodological distinctions in D.20-12-030 and D.25-01-037, the pending status of SCE's PFM, and the general lack of activity in R.15-05-006. We recommend the following revision:

PC-25U-01. Proposed Changes to the HFTD:

- o Description: PacifiCorp has not undergone the formal process of getting additional high-risk areas recognized beyond the CPUC-established HFTD.
- o Required Progress: In its 2026-2028 Base WMP, PacifiCorp must provide:
 - A process outlining how it compares areas in its HFRA to the current HFTD; and

⁵ CPUC Docket R.15-05-006. <https://apps.cpuc.ca.gov/apex/f?p=401:56>. Accessed March 14, 2025.

⁶ Proposed Decision Denying Petition to Modify Decisions 17-01-009, 17-12-024 and 20-12-030 and Dismissing Petition to Modify Decision 17-12-024 Without Prejudice, p. 1.

~~—Its plan for submitting a proposed change to the CPUC to modify the CPUC defined HFTD for any areas that PacifiCorp finds should be prioritized for mitigation efforts and considered for recognition.~~

o Discussed in Section 6, “Risk Methodology and Assessment.”⁷

GPI also recommends that OEIS work directly with the CPUC to gain clarity on CPUC next steps for an HFTD update process and possible new proceeding. GPI anticipates that coordination between the CPUC and OEIS will clarify next steps as it pertains to updating the HFTD across California, including for all CPUC jurisdictional utilities, and the linkage to the modern day WMP and models therein.

Require PacifiCorp to provide its QA/QC inspection pass rate regardless of whether it increases its pass rate target.

The Draft Decision issues PC-25U-06. *QA/QC Pass Rate Targets on account of PacifiCorp establishing a lower QA/QC pass rate than the 95-100 percent current industry standard.* However as written, PC-25U-06 creates loopholes for reporting that should be eliminated. There are two critical issues: (1) PacifiCorp’s contractual pass rate is below current industry standards; and (2) Failure to report on actual inspection QA/QC pass rate for the purpose of WMP review, regardless of the pass rate target, is unacceptable.

As written, PacifiCorp could avoid reporting on its 2023 and 2024 inspection QA/QC pass rate and causes for failed inspections simply by adopting a higher pass rate target in their 2026-2028 WMP. This means that their actual pass rate in 2023 and 2024 could be below the 95 percent industry standard, but simply by adopting a 95 percent pass rate target going forward (i.e. just a goal) they can avoid reporting on past inspection shortcomings and root causes in their 2026-2028 WMP.

It’s not clear why PacifiCorp should only have to report on its actual QA/QC program pass rates for 2023 and 2024 if it does not increase its pass rate “targets” for 2026-2028. Required reporting on causes of 2023-2024 inspection failures and a table of inspection failures should also not be contingent on whether PacifiCorp increases its 2026-2028 inspection pass rate “target.” Wildfire risk is likely decreased by achieving a higher inspection QA/QC pass rate (i.e. ensuring high quality inspections that “catch” and remediate risk before it leads to an

⁷ PacifiCorp Draft Decision, p. 63.

outage/ignition), not whether a higher pass rate “target” is adopted. A utility must achieve the high pass rate target to realize the risk reduction benefits. Prior pass rate data confirms whether current industry standards were achieved and is valuable in assessing improvements over time.

PacifiCorp should be required to report on its 2023 and 2024 inspection pass rate regardless of whether it increases its pass rate target going forward. If PacifiCorp’s actual inspection QA/QC pass rate was below 95 percent (industry standard) in 2023 and 2024 then it should be required to report on the specifics of the inspection failures, investigate the root cause, and provide a solution to improve the pass rate, its inspection process, and/or QA/QC process accordingly. If PacifiCorp achieved a pass rate of 95 percent or above in 2023/2024, then it technically complies with current industry standards, though it is still permissible for PacifiCorp to continue to improve both its inspection and/or QA/QC process. In any case, pass rate transparency that supports WMP review should not be contingent on whether PacifiCorp increases its pass rate “target” in future years.

To improve PC-25U-06, GPI recommends the following revisions:

Required Progress: In its 2026-2028 Base WMP, PacifiCorp must:

- Discuss the outcome of its contract negotiations regarding its QA/QC requirements to reflect appropriate safety outcomes and industry standards.
- Provide its evaluation of new QA/QC processes.
- Provide a narrative explanation of why PacifiCorp’s 2026-2028 pass rate targets are appropriate given its current maturity and how the pass rates are designed to achieve appropriate safety outcomes.

If PacifiCorp does not increase its pass rate targets for 2026-2028, PacifiCorp must provide:

- **Provide its ~~its~~ actual pass rates for each QA/QC program in 2023 and 2024.**

If PacifiCorp’s pass rates for 2023 and 2024 were below 95 percent, it must provide:

- A list and description of all criteria that result in an inspection failing to pass QA/QC.
- A table of all inspections in 2023 and 2024 that failed QA/QC containing the following information:
 - o Inspection type (detailed, intrusive pole, etc.).
 - o Inspection identifier.
 - o Inspection date.
 - o QA/QC failure reason(s).

- [A plan for improving its QA/QC pass rate and an](#)~~An~~ analysis demonstrating that PacifiCorp's 2026-2028 QA/QC process and pass rate targets will drive improvement in the quality of its inspections.⁸

ACI should not be closed if they are not yet adequately addressed. PacifiCorp's ability to adequately address PC-23B-14 in its 2026-2028 Base WMP should be tracked by an ACI.

PC-23B-14. *Asset Management and Enterprise Systems*, "found that PacifiCorp did not have a consolidated asset management and enterprise system."⁹ The Draft Decision further finds that:

PacifiCorp has not sufficiently responded to this area for continued improvement but will be required to provide information required by PC-23B-14 in its 2026-2028 Base WMP pursuant to the applicable WMP Guidelines. No further reporting is required on this area for continued improvement in PacifiCorp's 2026-2028 Base WMP.¹⁰

GPI is concerned that closing an ACI that is deemed not sufficiently addressed reduces the ability to clearly track when the issue is "sufficiently addressed." This approach also further weakens the clout of ACI in general. If an ACI is not sufficiently addressed, it should remain open or be supplanted with an updated ACI until the issue is adequately resolved, clearly tracking both resolution completion and timing, regardless of whether reporting also occurs within a WMP and according to the WMP filing guidelines.

GPI recommends retaining PC-23B-14 as an outstanding ACI that is not adequately addressed, and requiring PacifiCorp to provide a summary of how it has addressed any outstanding, specific ACI requirements, including with references to relevant sections in the WMP. This means PacifiCorp must address the issue in its Base WMP, while also preserving a consistent method for ACI completion tracking.

Conclusion

We urge the OEIS to adopt our recommendations herein.

⁸ PacifiCorp Draft Decision, p. 66-67.

⁹ Ibid, p. 39.

¹⁰ Ibid, p. 41.

Dated March 17, 2025.

Respectfully Submitted,



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