



# PacifiCorp's 2023 Substantial Vegetation Management (SVM) Audit Corrective Action Plan Rev. 0

March 21, 2025



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# INTRODUCTION

In compliance with the Office of Energy Infrastructure Safety's (OEIS or Energy Safety) February 21, 2025, Audit Report on PacifiCorp's Substantial Vegetation Management (SVM) Work in 2023 (2023 SVM Audit Report), PacifiCorp submits this Substantial Vegetation Management Audit Response and Corrective Action Plan.

## 1 SVM FINDINGS

Energy Safety's 2023 SVM Audit Report determined that PacifiCorp did not provide information supporting completion of work relating to five initiatives of the Company's 2023-2025 WMP, Quarterly Data Reports (QDR), non-spatial data tables, and data request responses submitted by PacifiCorp.

The five conditions with inadequate information to demonstrate compliance are presented as follows:

**Table 1 : Summary of All Non-Compliances**

Programmatic Area	Analysis/Information	Corrective Actions/Findings
8.2.3.1 Vegetation and Fuels Management - Pole Clearing	3,100 poles brushed in Local Responsibility Areas (LRA) High Fire Threat Area) HFTD areas of the targeted 3,126 poles. PacifiCorp fell short of its Fuels Management - Pole Clearing beyond Public Resources Code (PRC) 4292 (VM-05) target by 26 poles.	PacifiCorp must provide a corrective action plan addressing the deficiency identified relative to its pole clearing target.
8.2.3.2 Vegetation and Fuels Management - Wood and Slash Management	While the documents provided by PacifiCorp indicate that some work on slash removal was completed, Energy Safety cannot confirm wood and slash were removed in all or most instances.	PacifiCorp must submit documentation identifying the locations and dates where slash was removed or lopped and scattered except when beyond PacifiCorp's control. Without this documentation, PacifiCorp has not demonstrated that the work was completed.

Programmatic Area	Analysis/Information	Corrective Actions/Findings
8.2.3.3 Vegetation and Fuels Management – Clearance	While PacifiCorp was able to demonstrate that it completed clearance work on transmission and distribution lines in the reports provided, it could not demonstrate that it implemented the expanded clearances for fast growing species.	PacifiCorp should provide documentation showing that increased clearances were achieved based on the growth rate, or the steps it will take to record this information in future years to minimize the risk of encroachment of fast-growing species on its electrical infrastructure.
8.2.3.5 Vegetation and Fuels Management – Substation Defensible Space	Because vegetation management inspections and corrective actions were not sufficiently documented, the information PacifiCorp provided did not demonstrate that all work commitments in this statement were completed.	In its CAP response, PacifiCorp must either provide documentation showing that vegetation management work was completed as a part of its substation inspections or provide information on how it plans to track this work in future years.
8.2.3.6 Vegetation and Fuels Management – High-Risk Species	While PacifiCorp was able to demonstrate that it completed clearance work (pruning and removals) on distribution lines, it was unable to provide information related to clearance distance, HFTD tier, or whether additional pruning for at-risk species with very fast growth rates was completed because file provided did not capture data on which species were considered “at-risk.”	PacifiCorp must provide a corrective action plan addressing the deficiency identified in Statement 8.

## 2 PACIFICORP'S CORRECTIVE ACTIONS

**Table 2 : Corrective Action Plans/Response**

Programmatic Area/ Corrective Action #	PacifiCorp's Response	Milestone / Delivery Date
8.2.3.1 Vegetation and Fuels Management – Pole Clearing	PacifiCorp has revised its pole clearing tracking process to more accurately capture poles that are inspected and not worked, or are exempt. This change allows for increased accuracy of pole counts and ability to account for impacts of other WMP initiatives.	Process changes were implemented in 2024 and are reflected in the 2024 pole clearing data.
8.2.3.2 Vegetation and Fuels Management – Wood and Slash Management	PacifiCorp will benchmark debris management data collection with other California utilities to learn how other utilities conduct and track debris management. Information gathered will be used to inform potential changes in PacifiCorp's process and additions to the Company's new work management software (GeoDigital).	Q4 2026
8.2.3.3 Vegetation and Fuels Management – Clearance	PacifiCorp will develop a process to identify "cyclebuster" trees or very fast growing trees (trees generally growing more than 3 feet per year) within its new work management software (GeoDigital). This will provide more specific information regarding locations of cyclebusters that will be reviewed during post-audits to verify clearance distances. If a work location passes the post-audit, it inherently means that adequate post-work clearances have been achieved.	Q1 2026
8.2.3.5 Vegetation and Fuels Management – Substation Defensible Space	PacifiCorp is receiving project reports of work completed from the Company's weed abatement vendor. Reports, include the specific substations where the abatement was performed at. These are included as attachments to this report.	
8.2.3.6 Vegetation and Fuels Management – High-Risk Species	At-risk species, include "cyclebusters". PacifiCorp will develop a process to identify "cyclebuster" trees or very fast growing trees (trees generally growing more than 3 feet per year), within its new work management software (GeoDigital). This will provide for more specific information regarding locations of cyclebusters that will be reviewed during post-audits to verify clearance distances. If a work location passes the post-audit, it inherently means that adequate post-work clearances have been achieved.	Q1 2026