

March 31, 2025

VIA OEIS E-FILING

Office of Energy Infrastructure Safety
715 P Street, 20th Floor
Sacramento, CA 95814
efiling@energysafety.ca.gov

RE: PacifiCorp 2024 Wildfire Mitigation Plan Update – Annual Compliance Plan

Dear Director Jacobs:

PacifiCorp d/b/a Pacific Power (PacifiCorp or the Company) provides the attached 2024 Annual Compliance Plan pursuant to Public Utilities Code § 8386.3(c)(1), addressing the Company's compliance with its WMP over the prior compliance period (calendar year 2024). This Plan is submitted in accordance with the Office of Energy Infrastructure Safety's September 2024 Compliance Guidelines.

If you have any questions regarding this request, please contact Pooja Kishore, Regulatory Affairs Manager at (503) 813-7314.

Sincerely,



Robert Meredith
Director, Regulation

cc: Docket No. #2024-EC_ARC
compliance@energysafety.ca.gov

**2024 ANNUAL REPORT ON COMPLIANCE
SUBMITTED BY PACIFICORP (U 901 E)
REGARDING COMPLIANCE WITH ITS 2023-2025 WILDFIRE MITIGATION PLAN**

Pursuant to the California Public Utilities Code Section 8386.3(c)(1), PacifiCorp d/b/a Pacific Power (PacifiCorp or the Company) provides this 2024 Annual Report on Compliance (ARC) addressing implementation of PacifiCorp’s 2023-2025 Wildfire Mitigation Plan (WMP). PacifiCorp’s revised 2023-2025 Base WMP that was submitted February 22, 2024.¹

BACKGROUND

During calendar year 2024, the Company worked diligently to implement the measures set forth in the 2023-2025 WMP and to address the areas for continuous improvement in the Decision on 2023-2025 Wildfire Mitigation Plan.² The Company previously reported detailed 2023-2025 WMP progress in quarterly submissions to the Office of Energy Safety (Energy Safety) throughout 2024 and early 2025. These include Pacific Power’s four 2024 Quarterly reports submitted May 2024, August 2024, November 2024, and February 2025.

PacifiCorp submits this 2024 ARC in accordance with the requirements set forth in the September 2024 Compliance Process issued by the Office of Energy Safety for the reporting period of January 1, 2024, through December 31, 2024, including: a written narrative, a list of change orders, and a detailed explanation of initiative-level projected versus actual spend.

¹ [TN13738_20240222T150927: 2023-2025 Final Wildfire Mitigation Plan February 22, 2024](#)

² [TN13711_20240212T144333 PacifiCorp 20232025 WMP Decision. February 12, 2024](#), Pages 80-91.

1. *A written narrative including:*
 - a. *A clear description of the electrical corporation’s progress towards achieving the summarized objectives for the three- and ten-year WMP plan cycle, as identified in its most recently approved WMP. Progress must be discussed individually for each stated objective.*

Pacific Power continues to make progress on achieving the objectives identified in the Company’s three- and ten-year WMP plan cycle. The below section addresses the progress for each individual objective stated in the Summary of Plan Objectives table from section 4.2 pg. 29 of the Company’s revised 2023-2025 Base WMP.

Summary of Plan Objectives

Initiative Category	Objectives
Risk Methodology and Assessment	<ul style="list-style-type: none"> • Complete implementation of FireSight, previously known as Wildfire Risk Reduction Model (WRRM), and ignition risk assessment in 2023. • Complete Public Safety Power Shutoff (PSPS) risk assessment in 2024. • Continue refinement of Risk Spend Efficiency (RSE) calculation methodology and calculate RSE for grid hardening initiatives
Grid Design, Operations, and Maintenance	<ul style="list-style-type: none"> • Continue execution of grid hardening plans. • Continue planned inspection programs, including Infra-red (IR) inspections on transmission lines. • Begin implementation of the IR inspection on distribution lines. • Continue to deploy enhanced Safety Settings (ESS), previously known as Elevated Fire Risk (EFR) settings.
Vegetation Management	<ul style="list-style-type: none"> • Continue progressing programs (annual patrols, routine cycle work and annual pole clearing). • Implement Enhanced Overhang Reduction pilot project.
Situational Awareness and Forecasting	<ul style="list-style-type: none"> • Complete implementation of the Fire Potential Index (FPI). • Deployment of Wildfire Detection Network (wildfire detection cameras and smoke sensors) • Evaluate Distribution Fault Anticipators (DFA) • Expand weather station network.
Emergency Preparedness	<ul style="list-style-type: none"> • Continued use of tabletop exercises to prepare for emergencies and PSPS events. • Incorporate feedback and industry best practices into emergency management practices. • Implement improvements to Public Safety Partner Portal (PSP Portal)
Community Outreach and Engagement	<ul style="list-style-type: none"> • Enhance customer outreach based on survey feedback and industry best practices. • Implement customer feedback from post season wildfire mitigation surveys into future outreach efforts. • Increase outreach to Access and Functional Needs (AFN) populations
PSPS	<ul style="list-style-type: none"> • Evaluate expansion of the free portable battery and backup electric power rebate programs.

Risk Methodology and Assessment

Complete implementation of FireSight, previously known as the Wildfire Risk Reduction Module (WRRM) and ignition risk assessment in 2023 – Pacific Power completed the implementation of the FireSight risk data and has identified circuits with the highest ignition risk using ranked composite risk scores within the Company’s California service territory. The application of the FireSight risk data identified geographic areas for inclusion for establishment of a High Fire Risk Area (HFRA).³ FireSight will also help calculate risk reduction for various mitigation efforts and initiatives.

Complete Public Safety Power Shutoff (PSPS) risk assessment in 2024 – The first version of the PSPS risk assessment is still in development and the Company is continuing to refine the model and develop internal PSPS probability and consequence.

Continue refinement of Risk Spend Efficiency (RSE) calculation methodology and calculate RSE for grid hardening initiatives – Pacific Power continues refining its RSE calculation by working with and comparing the Company’s calculation to other California utilities. The Company is collaborating with other utilities to help determine improvements and refinements to its own calculations and plans to continue measuring and calculating RSE for its grid hardening initiatives.

Grid Design, Operations, and Maintenance

Continue execution of grid hardening plans – Pacific Power is continuing to progress through its line rebuild program to install covered conductor, replace distribution and transmission wooden poles, enhance fault detection capabilities through the installation of system automation

³ [PacifiCorp 2025 Wildfire Mitigation Plan Updates Rev 2 Standalone Document January 17, 2025](#). Page 10.

equipment, and replace expulsion fuses. Detailed information on completions for 2024 can be found in subsection 1(b) below.

Continue planned inspection programs, including Infra-red (IR) inspections on transmission line

– The company was able to complete the planned 700 miles of IR inspections by Q3 of 2024.

The vendor-flown helicopters inspect Pacific Power transmission lines using IR cameras, checking for hotspots which could indicate equipment failure or potential future incidents. These findings are then reported and follow up detailed inspections or corrections can then be scheduled. This is an annual program and is scheduled to continue in 2025.

Begin implementation of the IR inspection on distribution lines – Pacific Power expanded the IR

inspection program in 2023 to include the inspection of distribution lines in the High Fire Threat District (HFTD). The company was able to complete the planned 810 miles of IR inspections by Q3 of 2024. This is an annual program and is scheduled to continue in 2025

Continue to deploy Enhanced Safety Settings (ESS) – Pacific Power continues to deploy ESS,

previously known as Elevated Fire Risk (EFR) settings on capable devices in the service territory. The Company also continues to upgrade current protective devices to increase the network of ESS capable devices and coverage on additional lines.

Vegetation Management

Continue progressing programs (annual patrols, routine cycle work and annual pole clearing) –

Pacific Power continues to progress through vegetation inspections, routine cycle work and pole clearing around distribution and transmission electric lines. Detailed information on completions for 2024 can be found in subsection 1(b) below.

Implement Enhanced Overhang Reduction pilot project – Pacific Power continues to evaluate the enhanced overhang reduction pilot by inspecting trees that were treated under the project in 2023 and 2024. An evaluation of the pilot will be completed by the end of 2025 to determine the results and effectiveness.

Situational Awareness and Forecasting

Complete implementation of Fire Potential Index (FPI) Fire Potential Index – FPI was completed and implemented in 2023 on the third-party software, allowing the Company to update the data inputs used in the District Fire Risk categories. Factors such as weather, fuels, and terrain inputs can help quantify the potential for large or consequential wildfires several days early.

Deployment of Wildfire Detection Network (wildfire detection cameras and smoke sensors) – Pacific Power installed six wildfire detection cameras as planned for 2024 and continues to evaluate the need for additional cameras in 2025. The Company also determined that smoke sensors were ineffective when compared to cameras and has no plans to continue utilizing them in the future. The installed sensors will be removed.

Evaluate Distribution Fault Anticipators (DFA) – Pacific Power determined that DFAs were ineffective in 2023 and discontinued this program in 2024.

Expand weather station network – The company expanded its weather station network by installing ten weather stations in 2024 and plans to continue expanding the weather station network in 2025.

Emergency Preparedness

Continued use of tabletop exercises to prepare for emergencies and Public Safety Power Shutoff (PSPS) events – Pacific Power conducted a three part exercise that included a tabletop in Q2 of 2024, with Modoc County to prepare local communities in case of a PSPS event.

Incorporate feedback and industry best practices into emergency management practices – Pacific Power participated in workshops, international and national forums, consortiums, and advisory boards in 2024 to maintain an understanding of existing best practices. The Company collaborates with industry experts regarding new technologies and research.

Implement improvements to Public Safety Partner (PSP) Portal – Pacific Power continues to work through improvements to the PSP Portal. Planned improvements consist of ensuring compliance with California Public Utilities Commission (CPUC) web-based Public Safety Partner Portal requirements, interactive mapping requirements, and to support Pacific Power’s efforts to prioritize restoration, backup power evaluation, additional communications, and other resources before, after and during PSPS events.

Community Outreach and Engagement

Enhance customer outreach based on survey feedback and industry best practices and implement customer feedback from post season wildfire mitigation surveys into future outreach efforts – Based on learnings from the 2024 surveys and learnings from industry best practices, Pacific Power is using the data to build a better understanding of the approach and content for future customer outreach . The Company will conduct surveys in 2025 to inform improvements and enhancements to outreach efforts.

Increase outreach to Access and Functional Needs (AFN) populations – Pacific Power continues to make improvements to the Pacific Power website with a “Supporting Accessibility Needs” page,⁴ brochures, and flyers to increase outreach to the AFN population and evaluate how to identify additional customers that have access and functional needs.

PSPS

Evaluate expansion of the free portable battery and backup electric power rebate programs – Pacific Power continues to evaluate efforts to increase awareness and identify eligible customers for the program. The program issued 86 rebates to eligible customers in 2024.

- b. *A description of the electrical corporation’s progress towards achieving the three- and ten-year detailed objectives listed in the tables in Section 8 of its WMP, including all subsections, with completion dates within the recently completed compliance period. Each objective must be discussed individually.*

The table below provides updates on Pacific Power’s progress on achieving the three- and ten-year objectives listed in the tables of Section 8 of the 2023-2025 Base WMP.

Objectives for Three Years (2023–2025)	Applicable Initiative(s), Tracking ID(s)	Reference (section & page #)	Completion Date	Progress Summary
Continue execution of grid hardening plans.	GH-01, GH-02, GH-03, GH-04, GH-05	8.1.2 pg. 139	December 2025 for 2023-2025 targets	Installed 72 line miles of covered conductor. Replaced 1,608 distribution poles. Replaced 204 transmission poles. Installed 11 system automation devices.
Replace all expulsion fuses within the HFTD	GH-05	8.1.2.12 pg. 145	December 2025	Completed 2,673 fuse replacements.
Incorporation of IR technology for enhanced inspections	AI-06, AI-07	8.1.3.5, 8.1.3.6 Pg. 154	January 2024	Completed 1,510 miles of infrared (IR) inspections on transmission and distribution lines.

⁴ [Supporting Accessibility Needs](#)

Objectives for Three Years (2023–2025)	Applicable Initiative(s), Tracking ID(s)	Reference (section & page #)	Completion Date	Progress Summary
Continue planned inspection programs	AI-01, AI-02, AI-03, AI-04, AI-05, AI-08	8.1.3 Pg. 146	Annually to January 2025	Completed 12,261 transmission patrol inspections. Completed 48,403 distribution patrol inspections. Completed 1,631 transmission detail inspections. Completed 8,628 distribution detail inspections. Completed 780 transmission intrusive pole inspections. Completed 2,517 distribution intrusive pole inspections.
Continue planned transmission and distribution wires maintenance	MA-01	8.1.4	Annually to January 2025	All weather stations in service by end of year 2023 were maintained in 2024. Annual maintenance for stations will continue in 2025.
Continue planned substation apparatus maintenance programs	MA-01	8.1.4	Annually to January 2025	All weather stations in service by end of year 2023 were maintained in 2024. Annual maintenance for stations will continue in 2025.
Continue to deploy Enhanced Safety Settings (ESS) previously known as EFR settings	GO-02	8.1.8	Ongoing activity	Pacific Power continues to deploy ESS on capable devices in the service territory. The company also continues to upgrade current protective devices to increase the network of ESS capable devices and coverage on additional lines.
Create subject matter expert (SME) process and procedure for vegetation management database review four times a year.	VM-11	8.2.2	December 2024	Pacific Power continues to transition and develop a new mobile work management software data collection process and this initiative is expected to be implemented as part of it in 2026.
Develop audits to provide understanding of the data collection process.	VM-11	8.2.5	December 2024	Pacific Power continues to transition and develop a new mobile work management software data collection process and this initiative is expected to be implemented as part of it in 2026.

Objectives for Three Years (2023–2025)	Applicable Initiative(s), Tracking ID(s)	Reference (section & page #)	Completion Date	Progress Summary
Create procedure for exchanging best practices with other California electrical corporations and implementing information into training and quality assurance.	VM-11	8.2.5	December 2024	Pacific Power has established a recurring meeting with PG&E to discuss vegetation management topics to exchange best practices, experiences, and vegetation management tactics. These meetings are for informational purposes and the parties (Pacific Power and PG&E) have implemented a process for running the meetings including agendas, meeting notes, document/information sharing and document accessibility for the parties to facilitate exchanges. Pacific Power continues to review opportunities of collaboration with other electric utilities in California.
Create QA/QC process and procedure for benchmarking data in the database and inspections.	VM-11	8.2.5	December 2025	Pacific Power continues to transition and develop a new mobile work management software data collection process and this initiative is expected to be implemented as part this initiative in 2026.
Develop training content for specialized equipment used for inspecting vegetation for conditions that increase wildfire risk.	VM-03, VM-11	8.2.7	December 2025	Applicable Pacific Power vegetation management personnel utilize rangefinders (specialized equipment) to aid in inspections, where warranted, to aid in conducting vegetation related inspections/reviews to identify clearance distances and strike tree potential. Pacific Power will develop a simple protocol for rangefinder calibration and maintenance.
Expand weather station network	SA-01	8.3.2	December 2025	The Company installed ten weather stations in 2024. Additional weather stations are planned for installation in 2025 and 2026.
Partner with the Department of Homeland Security for Wildland Fire Sensors Program	SA-03	8.3.4.1	Ongoing – Beginning March 2023	Pacific Power’s portion of the study was completed in in 2023. The Company determined that smoke sensors were ineffective when compared to cameras and have no plans to continue utilizing them in the future and the installed sensors will be removed.

Objectives for Three Years (2023–2025)	Applicable Initiative(s), Tracking ID(s)	Reference (section & page #)	Completion Date	Progress Summary
Install Wildfire Detection Cameras	SA-04	8.3.4.1	November 2025	Installed six cameras in 2024.
Complete Internal staff ECC (Emergency Coordination Center) and Department Operations Center (DOC) 3- year training program	EP-01	8.4.2	2025	Emergency Coordination Center staff continue to be trained in accordance with California OEIS curriculum standards for a Type III Utility Representative credential through identified course material online, workshops, and in person.
Continue the use of tabletop exercises to prepare for emergencies and PSPS events.	EP-02	8.4.3	Annually in the First and Second Quarters.	Pacific Power conducted a three part exercise that included a tabletop in Q2 of 2024, with Modoc County to prepare local communities in case of a PSPS even
Implement improvements to Public Safety Partner Portal (PSP Portal)	EP-03	8.4.4	2024	Pacific Power continues to work through improvements to the Public Safety Partner Portal. Planned improvements consist of ensuring compliance with CPUC web based Public Safety Partner Portal requirements, interactive mapping requirements, and to support Pacific Power’s efforts to prioritize restoration, backup power evaluation, additional communications, and other resources before and during PSPS events.
Perform Pre and Post-fire season customer survey	CO-01	8.5.2	Pre-Season Survey Once a year in Q2 Post-Season Survey Once a year in Q4	Pacific Power completed its pre- and post-season surveys for 2024.
Implement customer feedback from post season wildfire mitigation surveys into future outreach efforts	CO-01	8.5.2	October 2025	Based on 2024 surveys, and learnings from industry best practices, Pacific Power used the data to build a better understanding of the approach and content for future customer outreach. The Company is using the survey feedback in 2025 to implement improvements and enhancements to outreach efforts.

Objectives for Three Years (2023–2025)	Applicable Initiative(s), Tracking ID(s)	Reference (section & page #)	Completion Date	Progress Summary
Increase outreach to AFN populations	CO-02	8.5.3	October 2025	Pacific Power continues to make improvements to the Pacific Power website, including a “Supporting Accessibility Needs” page. brochures, and fliers to increase outreach to the AFN population and evaluate how to identify additional customers that are AFN eligible.
Continue partnering with public safety partners in communities throughout California regarding wildfire safety and preparedness and PSPS	CO-03	8.5.4	October 2025	Pacific Power participates in ongoing meetings with the wildfire advisory board, completed one tabletop exercise, one workshop, and one functional exercise. The company plans to attend safety and preparedness fairs in the future.

Objectives for Ten Years (2026–2032)	Applicable Initiative(s), Tracking ID(s)	Reference (section & page #)	Completion Date	Progress Summary
Improve Enhanced Safety Settings (ESS) capabilities	GO-01	8.1.8	December 2032	Pacific Power continues to deploy ESS on capable devices in the service territory. The company also continues to upgrade current protective devices to increase the network of ESS capable devices and coverage on additional lines.
Complete Line Rebuild of all identified overhead line miles within the HFTD	GH-01	8.1.2.1	December 2032	Pacific Power continues to make progress on the line rebuild program of all identified overhead line miles within the HFTD and completed 72 miles of covered conductor in 2024.
Complete System Automation upgrades on all identified relays	GH-04	8.1.2.8	December 2026	Pacific Power continues to make progress on the system automation upgrades on all identified relays and the company completed installation of 11 system automation devices in 2024.

Objectives for Ten Years (2026–2032)	Applicable Initiative(s), Tracking ID(s)	Reference (section & page #)	Completion Date	Progress Summary
Update vegetation database to have information about typical environmental conditions	VM-01, VM-02, VM-03, VM-04, VM-06, VM-07	8.2.5	December 2032	Pacific Power continues to transition to a new mobile work management software data collection process that will expand capabilities for tracking information about typical environmental conditions.
Continue expansion and refinement of weather station network	SA-01	8.3.2	December 2032	The Company installed ten additional weather stations in 2024 expanding out Pacific Power's weather station network. More weather station installations are planned in 2025 and 2026.
Continue to leverage AI and machine learning to create a more automated weather and risk forecasting system	SA-05	8.3.5	December 2032	The Company continues to evaluate AI and machine learning to refine and automate the weather and risk forecasting systems once those models have been fully implemented and improvements can be made.
Include hazards specific annexes for all service territory in the ERP	EP-01	8.4.2	April 2030	The Company continues to develop and revise the Emergency Response Plan towards the incorporation of hazard specific annexes for all service territories and to ensure it complies with California Public Utility Commission (CPUC) R. 15-06-009, D. 21-05-019 and GO 166.
Continue collaboration and coordination with Public Safety Partners	EP-02	8.4.3	Ongoing – to 2032	Pacific Power continues to conduct tabletop exercises, workshops, and functional exercises with public safety partners to be prepared in case of a PSPS event.
Improve surveys based on 2023-2025 experience	CO-01	8.5.2	2028	The Company continues to receive survey feedback to implement improvements and enhancements to outreach efforts.
Increase availability of website wildfire and PSPS resources into additional languages	CO-01	8.5.2	October 2032	The Company continues to make improvements to the webpages and resources while evaluating for additional languages and accessibility.
Continue to increase outreach to AFN populations	CO-02	8.5.3	October 2032	Pacific Power continues to make improvements to the webpage, brochures, and fliers to increase outreach to the AFN population and evaluate how to identify additional customers that are AFN eligible.

Objectives for Ten Years (2026–2032)	Applicable Initiative(s), Tracking ID(s)	Reference (section & page #)	Completion Date	Progress Summary
Continue to meet every two-three years with other utilities to discuss best practices and lessons learned	CO-04	8.5.5	October 2032	Pacific Power continues to participate and collaborate with other utilities to share best practices and lessons learned for industry standards and changes.
Automate collection and dissemination of key PSPS data	EP-03	8.4.4	March 2026	Pacific Power continues to work through improvements to the Public Safety Partner Portal. Planned improvements consist of ensuring compliance with CPUC web based Public Safety Partner Portal requirements, interactive mapping requirements, and to support Pacific Power’s efforts to prioritize restoration, backup power evaluation, additional communications, and other resources before and during PSPS events.

c. *An assessment of the electrical corporation’s completion of the three- and ten-year objectives listed in the tables in Section 8 of its WMP, including all subsections, with completion dates within the most recently completed compliance period. Each stated objective must be discussed individually.*

In the tables below are the assessment of Pacific Power’s progress on completion of the three- and ten-year objectives listed in the tables in Section 8 of the 2023-2025 Base WMP.

Objectives for Three Years (2023–2025)	Applicable Initiative(s), Tracking ID(s)	Reference (section & page #)	WMP Completion Date	Completion Date	Method of Verification Explanation	Incomplete Reasoning
Evaluate Distribution Fault Anticipators (DFA)	SA-02	8.3.3.1	Ending in 2024	December 2024	QDR, 2025 WMP Update	N/A

Pacific Power installed two DFAs in 2023 and found that it was difficult to ascertain the accuracy of reports and data received to support limited false positives and direct actionable information. Device reports did not have specific location data capabilities that would be helpful

for locating faults and so the Company completed the pilot of this initiative in 2024 and does not plan on future utilization of DFAs.

- d. *An assessment of the electrical corporation’s completion of all targets identified for each initiative listed in the tables in Section 8 of its WMP, including all subsections, with target completion dates within the most recently completed compliance period. The assessment of each target must be discussed individually.*

The tables and descriptions below assess Pacific Power’s completion of initiative targets in the tables of Section 8 of the 2023-2025 Base WMP.

Initiative Activity	Target & Unit	Target Completion Date	Date of Completion	Method of Verification	Expected Percentage Risk Reduction	QA/QC Quality
GH-01 Line Rebuild - Covered conductor installation	80 Line miles	Year-End 2024	N/A	N/A	N/A - Risk Reduction % is not able to be calculated at this time.	N/A

Completion Assessment – N/A

Incomplete Explanation – Pacific Power was unable to complete eight line miles of the 80 line miles planned for installation. The Company experienced delayed mobilization on one project that moved work into poor weather months which required helicopter set poles. Sub-contractors were mobilized but poor weather impacted their ability to complete the work before the end of the year. The remaining eight miles of work were completed in Q1 of 2025.

Initiative Activity	Target & Unit	Target Completion Date	Date of Completion	Method of Verification	Expected Percentage Risk Reduction	QA/QC Quality
GH-02 Distribution Pole Replacement	1,600 poles	Year-End 2024	December 2024	Completed work orders/ GIS Data Submission(s)	N/A - Risk Reduction % is not able to be calculated at this time.	N/A

Completion Assessment – Pacific Power completed 1,612 distribution pole replacements and reviewed completed work orders and verified against Geographic Information System (GIS) data submissions for the Quarterly Data Report (QDR) to confirm the completion of this initiative.

Incomplete Explanation – N/A

Initiative Activity	Target & Unit	Target Completion Date	Date of Completion	Method of Verification	Expected Percentage Risk Reduction	QA/QC Quality
GH-03 Transmission Pole Replacement	160 poles	Year-End 2024	August 2024	Completed work orders/ GIS Data Submission(s)	N/A - Risk Reduction % is not able to be calculated at this time.	N/A

Completion Assessment – Pacific Power completed 204 transmission pole replacements and reviewed completed work orders and verified against GIS data submissions for the Quarterly Data Report (QDR) to confirm the completion of this initiative.

Incomplete Explanation – N/A

Initiative Activity	Target & Unit	Target Completion Date	Date of Completion	Method of Verification	Expected Percentage Risk Reduction	QA/QC Quality
GH-04 Installation of system automation equipment	20 devices	Year-End 2024	N/A	N/A	N/A - Risk Reduction % is not able to be calculated at this time.	N/A

Completion Assessment – N/A

Incomplete Explanation – Pacific Power was unable to complete nine device installations of the 20 planned. The Company faced challenges regarding the availability of internal and contracted relay technicians and was unable to complete the planned target by end of year. Pacific Power

has contracted additional relay technicians for 2025, and technicians will remain on the project until the outstanding 2024 work is complete.

Initiative Activity	Target & Unit	Target Completion Date	Date of Completion	Method of Verification	Expected Percentage Risk Reduction	QA/QC Quality
GH-05 Expulsion fuse replacement	500 Fuse Locations	Year-End 2024	July 2024	Completed work orders/ GIS Data Submission(s)	N/A - Risk Reduction % is not able to be calculated at this time.	N/A

Completion Assessment – Pacific Power completed 2,674 expulsion fuse replacements and reviewed completed work orders and verified against GIS data submissions for the Quarterly Data Report (QDR) to confirm the completion of this initiative. The increase of actual fuse replacements compared to the target is the result of the establishment of a HFRA as described in the “Risk Assessment and Methodology” Section above and due to Pacific Power being consistent with the approach to expulsion fuse risk mitigation in the HFRA with Tier 2 and Tier 3 High Fire Threat Districts (HFTD).

Incomplete Explanation – N/A

Initiative Activity	Target & Unit	Target Completion Date	Date of Completion	Method of Verification	Expected Percentage Risk Reduction	QA/QC Quality
AI-01 Transmission Patrol Inspections	12,034 inspections	Year-End 2024	Q4 2024	Completed work orders/Facility Point Inspection (FPI) Data	N/A - Risk Reduction % is not able to be calculated at this time.	N/A

Completion Assessment – Pacific Power utilized the Company's Facility Point Inspection (FPI) database to confirm inspections and reviewed that against completed work orders.

Incomplete Explanation – N/A

Initiative Activity	Target & Unit	Target Completion Date	Date of Completion	Method of Verification	Expected Percentage Risk Reduction	QA/QC Quality
AI-02 Distribution Patrol Inspections	46,276 inspections	Year-End 2024	Q4 2024	Completed work orders/FPI Data	N/A - Risk Reduction % is not able to be calculated at this time.	N/A

Completion Assessment – Pacific Power utilized the Company's Facility Point Inspection (FPI)

database to confirm inspections and reviewed that against completed work orders.

Incomplete Explanation – N/A

Initiative Activity	Target & Unit	Target Completion Date	Date of Completion	Method of Verification	Expected Percentage Risk Reduction	QA/QC Quality
AI-03 Transmission Detail Inspections	1,631 inspections	Year-End 2024	Q4 2024	Completed work orders/FPI Data	N/A - Risk Reduction % is not able to be calculated at this time.	N/A

Completion Assessment – Pacific Power utilized the Company's Facility Point Inspection (FPI)

database to confirm inspections and reviewed that against completed work orders.

Incomplete Explanation – N/A

Initiative Activity	Target & Unit	Target Completion Date	Date of Completion	Method of Verification	Expected Percentage Risk Reduction	QA/QC Quality
AI-04 Distribution Detail Inspections	8,672 inspections	Year-End 2024	Q4 2024	Completed work orders/FPI Data	N/A - Risk Reduction % is not able to be calculated at this time.	N/A

Completion Assessment – Pacific Power utilized the Company's Facility Point Inspection (FPI)

database to confirm inspections and reviewed that against completed work orders.

Incomplete Explanation – Pacific Power completed 8,628 of the planned 8,672 inspections.

The remaining inspection locations were determined to be either retired facility points or incorrectly labeled in the system and did not meet the criteria for inspection as part of this initiative. Pacific Power considers this initiative complete for 2024 and does not have any corrective actions for the variance.

Initiative Activity	Target & Unit	Target Completion Date	Date of Completion	Method of Verification	Expected Percentage Risk Reduction	QA/QC Quality
AI-05 Transmission Intrusive Pole Inspections	783 inspections	Year-End 2024	Q4 2024	Completed work orders/FPI Data	N/A - Risk Reduction % is not able to be calculated at this time.	N/A

Completion Assessment – Pacific Power utilized the Company's Facility Point Inspection (FPI) database to confirm inspections and reviewed that against completed work orders.

Incomplete Explanation – Pacific Power completed 780 of the planned 783 inspections. The remaining inspection locations were determined to be retired facility points which did not meet the criteria for inspection as part of this initiative. Pacific Power considers this initiative complete for 2024 and does not have any corrective actions for the variance.

Initiative Activity	Target & Unit	Target Completion Date	Date of Completion	Method of Verification	Expected Percentage Risk Reduction	QA/QC Quality
AI-06 Distribution Intrusive Pole Inspections	2,523 inspections	Year-End 2024	Q4 2024	Completed work orders/FPI Data	N/A - Risk Reduction % is not able to be calculated at this time.	N/A

Completion Assessment – Pacific Power utilized the Company's Facility Point Inspection (FPI) database to confirm inspections and reviewed that against completed work orders.

Incomplete Explanation – Pacific Power completed 2,517 of the planned 2,523 inspections.

The remaining inspection locations were determined to be either retired facility points or incorrectly labeled in the system and did not meet the criteria for inspection as part of this initiative. Pacific Power considers this initiative complete for 2024 and does not have any corrective actions for the variance.

Initiative Activity	Target & Unit	Target Completion Date	Date of Completion	Method of Verification	Expected Percentage Risk Reduction	QA/QC Quality
AI-07 Enhanced (Infrared) Inspections in transmission lines	700 line miles	Year-End 2024	Q4 2024	Completed work orders/SAP Data Submission(s)	N/A - Risk Reduction % is not able to be calculated at this time.	N/A

Completion Assessment – Pacific Power utilized the Company's Facility Point Inspection (FPI) database to confirm inspections and reviewed that against completed work orders.

Incomplete Explanation – N/A

Initiative Activity	Target & Unit	Target Completion Date	Date of Completion	Method of Verification	Expected Percentage Risk Reduction	QA/QC Quality
AI-08 Enhanced (Infrared) Inspections in distribution lines	810 line miles	Year-End 2024	Q3 2024	Completed work orders/SAP Data Submission(s)	N/A - Risk Reduction % is not able to be calculated at this time.	N/A

Completion Assessment – Pacific Power utilized the Company's Facility Point Inspection (FPI) database to confirm inspections and reviewed that against completed work orders.

Incomplete Explanation – N/A

Initiative Activity	Target & Unit	Target Completion Date	Date of Completion	Method of Verification	Expected Percentage Risk Reduction	QA/QC Quality
AI-11 Substation Inspections (Minor, Major, Security, and Infrared)	451 inspections	Year-End 2024	Q4 2024	Completed work orders/SAP Data Submission(s)	N/A - Risk Reduction % is not able to be calculated at this time.	N/A

Completion Assessment – Pacific Power utilized the Company's Facility Point Inspection (FPI) database to confirm inspections and reviewed that against completed work orders.

Incomplete Explanation – Pacific Power completed 443 substation inspections of the planned 451. The variance in projected and actuals is due to the decommissioning of a substation in 2024 that was included in the original plan. The Company considers this initiative complete for 2024 and does not have any corrective actions for the variance.

Initiative Activity	Target & Unit	Target Completion Date	Date of Completion	Method of Verification	Expected Percentage Risk Reduction	QA/QC Quality
VM-01 Detailed Inspection – Distribution	874 circuit miles inspected	Year-End 2024	Q4 2024	Inspection records, billing, project closeout documentation, and field verification	N/A - Risk Reduction % is not able to be calculated at this time.	N/A

Completion Assessment – 100% of vegetation management pruning and removal activities associated with annual inspections and correction work was field audited and confirmed complete.

Incomplete Explanation – N/A

Initiative Activity	Target & Unit	Target Completion Date	Date of Completion	Method of Verification	Expected Percentage Risk Reduction	QA/QC Quality
VM-02 Detailed Inspection - Transmission	602 line miles inspected	Year-End 2024	N/A	Inspection records, billing, project closeout documentation, and field verification	N/A - Risk Reduction % is not able to be calculated at this time.	N/A

Completion Assessment – 100 percent of vegetation management pruning and removal activities associated with annual inspections and correction work was field audited.

Incomplete Explanation – N/A

Initiative Activity	Target & Unit	Target Completion Date	Date of Completion	Method of Verification	Expected Percentage Risk Reduction	QA/QC Quality
VM-03 Patrol Inspection - Distribution	865 circuit miles inspected	Year-End 2024	Q3 2024	Inspection records, billing, project closeout documentation, and field verification	N/A - Risk Reduction % is not able to be calculated at this time.	N/A

Completion Assessment – 100 percent of vegetation management pruning and removal activities associated with annual inspections and correction work was field audited and confirmed complete.

Incomplete Explanation – N/A

Initiative Activity	Target & Unit	Target Completion Date	Date of Completion	Method of Verification	Expected Percentage Risk Reduction	QA/QC Quality
VM-04 Patrol Inspection - Transmission	99 line miles inspected	Year-End 2024	Q3 2024	Inspection records, billing, project closeout documentation, and field verification	N/A - Risk Reduction % is not able to be calculated at this time.	N/A

Completion Assessment – 100 percent of vegetation management pruning and removal activities associated with annual inspections and correction work was field audited and confirmed complete.

Incomplete Explanation – N/A

Initiative Activity	Target & Unit	Target Completion Date	Date of Completion	Method of Verification	Expected Percentage Risk Reduction	QA/QC Quality
VM-05 Fuels management – Pole clearing beyond PRC 4292	3,126 Poles brushed in LRA HFTD areas	Year-End 2024	Q4 2024	Annual post-work audit by internal staff	N/A - Risk Reduction % is not able to be calculated at this time.	N/A

Completion Assessment – 100 percent of vegetation management pruning and removal activities associated with annual inspections and correction work was field audited and confirmed complete.

Incomplete Explanation – N/A

Initiative Activity	Target & Unit	Target Completion Date	Date of Completion	Method of Verification	Expected Percentage Risk Reduction	QA/QC Quality
VM-11 QAQC - Post-Audits Distribution (Patrol)	865 line miles	Year-End 2024	Q3 2024	Mileage documentation and tracking	N/A - Risk Reduction % is not able to be calculated at this time.	N/A

Completion Assessment – 100 percent of vegetation management pruning and removal activities associated with annual inspections and correction work was field audited and confirmed complete.

Incomplete Explanation – N/A

Initiative Activity	Target & Unit	Target Completion Date	Date of Completion	Method of Verification	Expected Percentage Risk Reduction	QA/QC Quality
VM-11 QAQC - Post-Audits Transmission (Patrol)	99 line miles	Year-End 2024	Q3 2024	Mileage documentation and tracking	N/A - Risk Reduction % is not able to be calculated at this time.	N/A

Completion Assessment – 100 percent of vegetation management pruning and removal activities associated with annual inspections and correction work was field audited and confirmed complete.

Incomplete Explanation – N/A

Initiative Activity	Target & Unit	Target Completion Date	Date of Completion	Method of Verification	Expected Percentage Risk Reduction	QA/QC Quality
SA-01 Weather Stations	8 Weather Stations	Year-End 2024	Q3 2024	Completed work orders, GIS Data Submission(s)	N/A - Risk Reduction % is not able to be calculated at this time.	N/A

Completion Assessment – Close of work orders in Q3 of 2024 confirmed the installation of the weather stations and were verified against GIS data provided for the 2024 Q3 California QDR submission.

Incomplete Explanation – N/A

Initiative Activity	Target & Unit	Target Completion Date	Date of Completion	Method of Verification	Expected Percentage Risk Reduction	QA/QC Quality
SA-04 Wildfire Cameras	6 Cameras	Year-End 2024	Q4 2024	Completed work orders	N/A - Risk Reduction % is not able to be calculated at this time.	N/A

Completion Assessment – Close out of work orders in Q4 of 2024 confirmed the installation of the six wildfire cameras.

Incomplete Explanation – N/A

Initiative Activity	Target & Unit	Target Completion Date	Date of Completion	Method of Verification	Expected Percentage Risk Reduction	QA/QC Quality
EP-02 External collaboration and coordination	1 Functional Exercise (FE) 1 Tabletop Exercise (TTX) 1 workshop	Year-End 2024	Q4 2024	After Action Report and Improvement Plan (AAR/IP)	N/A - Risk Reduction % is not able to be calculated at this time.	N/A

Completion Assessment – After Action Reports and Improvement Plans confirmed the completion of one functional exercise, one table top exercise, and one workshop with Modoc County.

Incomplete Explanation – N/A

Initiative Activity	Target & Unit	Target Completion Date	Date of Completion	Method of Verification	Expected Percentage Risk Reduction	QA/QC Quality
CO-01 AFN resources on the website	1 additional language for the medical certificate	Year-End 2024	Q4 2024	Review of the website and backend logs	N/A - Risk Reduction % is not able to be calculated at this time.	N/A

Completion Assessment – Review of the website and backend logs confirmed that the medical certificate application is available in Spanish.

Incomplete Explanation – N/A

2. *A complete listing of all change orders requested by the electrical corporation that were approved by Energy Safety. For each change order, the electrical corporation must include a description of the change requested, the date the electrical corporation requested the change order, and the date that Energy Safety approved the requested change order.*

Pacific Power did not submit any change orders in 2024.

3. *A list that includes the following information for each WMP initiative identified in the WMP:*

Initiative ID	Initiative	Planned	Actual	Variance Description
		(\$ thousands)	(\$ thousands)	
AI-01	Transmission Patrol inspections	\$93	\$63	Actual costs to complete the planned work was less than anticipated when the 2024 plan was projected prior to 2023.
AI-02	Distribution Patrol Inspections	\$308	\$266	Actual costs to complete the planned work was less than anticipated when the 2024 plan was projected prior to 2023.
AI-03	Transmission Detail Inspections	\$137	\$57	Actual costs to complete the planned work was less than anticipated when the 2024 plan was projected prior to 2023.
AI-04	Distribution Detail Inspections	\$203	\$231	Actual costs to complete the planned work was higher than anticipated when the 2024 plan was projected prior to 2023.
AI-05	Transmission Intrusive Pole Inspections	\$171	\$95	Actual costs to complete the planned work was less than anticipated when the 2024 plan was projected prior to 2023.
AI-06	Distribution Intrusive Pole Inspections	\$90	\$103	Actual costs to complete the planned work was higher than anticipated when the 2024 plan was projected prior to 2023.

Initiative ID	Initiative	Planned	Actual	Variance Description
		(\$ thousands)	(\$ thousands)	
AI-07	Enhanced (Infrared) Inspections in Transmission Lines	\$90	\$85	Within 10% of plan
AI-08	Enhanced (Infrared) Inspections in Distribution Lines	\$130	\$129	Within 10% of plan
AI-11	Substation Inspections	\$179	\$181	Within 10% of plan
AI-12	Quality Assurance and Quality Control	\$36	\$0	Asset inspection QA/QC costs were not charged out to work orders for 2024 and the actuals for this initiative were not tracked separately.
CO-01	Public Outreach and Education Awareness Program	\$90	\$100	Pacific Power did more outreach in 2024 than what was originally forecasted prior to 2023. The actual costs for 2024 are more aligned with actual costs from 2023.
EP-01	Emergency Preparedness Plan	\$50	\$253	Original projections did not include all related emergency management and meteorology personnel for 2024 when the plan was created prior to 2023.
EP-02	External Collaboration and Coordination	\$30	\$7	Pacific Power did not require as much funding for this initiative as originally forecasted prior to 2023 for the 2024 year.
GH-01	Line Rebuild - Covered conductor installation	\$62,313	\$115,739	Costs increased due to bringing on a construction project management company to manage the system hardening projects. Incremental costs include field engineering support, post construction inspections, extended warranty, etc.
GH-04	Installation of system automation equipment	\$5,000	\$12,796	Costs increased due to bringing on a construction project management company to manage the system hardening projects. Additionally, project work in 2024 included higher costs to extend communications to field devices increasing the cost per unit completed.
GH-05	Expulsion fuse replacement	\$1,000	\$5,324	Increase in expulsion fuses replaced due to Pacific Power establishing a High Fire Risk Area (HFRA). Consistent with the Company's approach to replacing expulsion fuses in the Tier 2 and Tier 3 High Fire Threat Districts, the company replaced the expulsion fuses in the HFRA.
GO-02	Grid Response Procedures and Notifications (Grid Ops): Patrols	\$600	\$3,751	Encroachment patrols was not originally included in the 2024 plan when this initiative was forecasted back in 2023.
MA-01	Equipment Maintenance and Repair	\$285	\$387	The original forecast for this initiative did not include the costs associated with the weather station data plans.
PS-01	Protocols on PSPS	\$800	\$0	Pacific Power did not have any PSPS events in 2024.

Initiative ID	Initiative	Planned	Actual	Variance Description
		(\$ thousands)	(\$ thousands)	
RA-01	Risk and Risk Components Calculation	\$130	\$368	The spend for initiative includes the spend for RA-03 and the original forecast did not include the work for calculating risk reduction.
RA-03	Other Key Metrics	\$40	\$0	The work break down structure for this work was originally planned to be separated to RA-03 when forecasted in 2023 for 2024. It has since changed and is now being captured in spend for RA-01.
RA-04	Enterprise System for Risk Assessment	\$157	\$157	Within 10% of plan
SA-01	Environmental Monitoring Systems	\$160	\$209	Pacific Power installed two stations more than were originally planned for 2024 and presented in the 2023-2025 Base WMP.
SA-02	Grid Monitoring Systems	\$39	\$108	The original forecast for this initiative did not include the costs associated with the data connections for the DFAs.
SA-03	Smoke and Air Quality Sensors	\$15	\$14	Within 10% of plan
SA-04	Ignition Detection Systems	\$1,065	\$1,031	Within 10% of plan
SA-05	Weather Forecasting	\$115	\$267	The original forecast was for a limited scope and the domain expansion costs were not included in Pacific Power's original forecast.
SA-06	Fire Potential Index	\$97	\$0	The actual costs for this initiative were included in the actuals for the SA-05 initiative.
VM-01	Detailed Inspection – Distribution	\$294	\$492	Pacific Power increased vegetation management activity for 2024 due to the establishment of the High Fire Risk Area (HFRA) for which the plan did not originally account. The Company's approach to vegetation management in the HFRA is consistent with vegetation management in the Tier 2 and Tier 3 High Fire Threat Districts for which the plan did not originally account.
VM-02	Detailed Inspection - Transmission	\$157	\$201	Pacific Power increased vegetation management activity for 2024 due to establishment of the High Fire Risk Area (HFRA) for which the plan did not originally account. The Company's approach to vegetation management in the HFRA is consistent with vegetation management in the Tier 2 and Tier 3 High Fire Threat Districts.
VM-03	Patrol Inspection - Distribution	\$316	\$333	Within 10% of plan
VM-04	Patrol Inspection - Transmission	\$20	\$25	Pacific Power had increased vegetation management activity for 2024 due to the establishment of the High Fire Risk Area (HFRA) for which the plan did not originally account. The Company's approach to vegetation management in the HFRA is

Initiative ID	Initiative	Planned	Actual	Variance Description
		(\$ thousands)	(\$ thousands)	
				consistent with vegetation management in the Tier 2 and Tier 3 High Fire Threat Districts.
VM-05	Pole Clearing	\$374	\$413	Pacific Power increased vegetation management activity for 2024 due to the establishment of the High Fire Risk Area (HFRA) for which the plan did not originally account. The Company's approach to vegetation management in the HFRA is consistent with vegetation management in the Tier 2 and Tier 3 High Fire Threat Districts.
VM-06	Clearance - Distribution	\$15,087	\$18,295	Pacific Power increased vegetation management activity for 2024 due to the establishment of the High Fire Risk Area (HFRA) for which the plan did not originally account for. The Company's approach to vegetation management in the HFRA is consistent with vegetation management in the Tier 2 and Tier 3 High Fire Threat Districts.
VM-07	Clearance - Transmission	\$1,904	\$2,498	Pacific Power increased vegetation management activity for 2024 due to the High Fire Risk Area (HFRA) for which the plan did not originally account for. The Company's approach to vegetation management in the HFRA is consistent with vegetation management in the Tier 2 and Tier 3 High Fire Threat Districts.
VM-08	Fall-in Mitigation	\$30	\$0	This program was discontinued before 2024 and no activity or spend occurred.
VM-11	Quality assurance / quality control	\$135	\$171	Pacific Power increased vegetation management activity for 2024 due to the High Fire Risk Area (HFRA) for which the plan did not originally account for. The Company's approach to vegetation management in the HFRA is consistent with vegetation management in the Tier 2 and Tier 3 High Fire Threat Districts.
WP-01	Wildfire Mitigation Strategy Development	\$520	\$949	The costs for independent evaluation were not included in Pacific Power's plan for 2024 when it was originally forecasted in 2023.
WP-02	Identifying and Evaluating Mitigation Initiatives	\$100	\$666	The grant study included in this initiative was not included for the 2024 plan when it was originally forecasted in 2023.
	Total	\$92,360	\$165,764	

CONCLUSION

PacifiCorp's WMP efforts continue to evolve, both through internal learning and additional guidance received from the Office of Energy Infrastructure Safety, the California Public Utilities Commission, other California utilities, stakeholders, and our customers. The Company has made great progress in implementing the objectives of its 2023-2025 WMP and continues to evaluate and refine programs and measures to ensure that it is taking actions that will reduce wildfire risk without imposing unnecessary costs and burdens on customers.