



825 NE Multnomah, Suite 2000
Portland, Oregon 97232

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Jolynne Flores
Wildfire Safety Analyst
Jolynne.Flores@energysafety.ca.gov

Nicole Dunlap
Nicole.Dunlap@energysafety.ca.gov

Dakota Smith
Dakota.Smith@energysafety.ca.gov

Surya Keshav
Surya.Keshav@energysafety.ca.gov

Eli Weissman
Eli.Weissman@energysafety.ca.gov

Re: CA 2025-WMPs
OEIS-P-WMP_2025-PC-01

Please find enclosed PacifiCorp's responses to OEIS data requests 1.1-1.4.

If you have any questions, please call me at (503) 813-7314.

Sincerely,

_____/s/_____
Pooja Kishore
Manager, Regulation

OEIS Data Request 1.1

Regarding Vegetation Management Inspection Targets:

On page 268 of its 2026-2028 Base WMP, for Off-cycle Distribution Inspections (VM-03), Table 9-3, describes the “Area Impacted” as “lines within or that intersect HFTD Tier 2 or Tier 3, HFRA” and “Frequency” as “Annual.”¹ On page 266, for Off-cycle Distribution Inspections, Table 9-2, “% HFTD Covered in 2026” as “86%.”

1. Does PacifiCorp intend the Off-cycle Distribution Inspection target to cover less than 100 percent of PacifiCorp’s HFTD distribution lines?
 - i. If yes:
 1. Explain why PacifiCorp does not perform off-cycle distribution inspections on 100 percent of the HFTD.
 2. Explain how PacifiCorp identifies risk from vegetation on overhead distribution lines within the HFTD that are not part of Off-cycle Distribution Inspections.
 - ii. If no:
 1. Provide the calculation used to determine “% HFTD Covered” for “Off-Cycle (Patrol) Inspection – Distribution (FIN).”
 2. Confirm whether the same method used to determine “% HFTD Covered” for “Off-Cycle (Patrol) Inspection – Distribution (FIN)” was used for all “% HFTD Covered in 2026” values in Table 9-2.

Response to OEIS Data Request 1.1

1. No. PacifiCorp annually conducts a vegetation inspection on 100 percent of the Company’s High Fire Threat District (HFTD) distribution lines. With respect to the “86%” entry in Table 9-2, the column header of %HFTD in Table 9-2, PacifiCorp interpreted the header differently than what appears to be the interpretation contemplated in this Q01. The target for Off-Cycle Distribution Inspections of 1,109 line miles includes line miles from outside the HFTD and High Fire Risk Area (HFRA) (because PacifiCorp will complete the inspection for the entire circuit, not just the segments of the circuit within HFTD or HFRA). Therefore, PacifiCorp interpreted the “% HFTD” to mean the line miles of the total 1,109 which are located within HFTD and/or HFRA, which is 950 line miles or 86% of the total target.
 - i.
 1. Not Applicable.
 2. Not Applicable.

¹ PacifiCorp, 2026-2028 Base Wildfire Mitigation Plan, Published July 11, 2025, URL:(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=58907&shareable=true>).

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ii.

1. See response to subpart (a).
2. Confirmed.

Despite PacifiCorp's diligent efforts, certain information protected from disclosure by the attorney-client privilege or other applicable privileges or law may have been included in its responses to these data requests. PacifiCorp did not intend to waive any applicable privileges or rights by the inadvertent disclosure of protected information, and PacifiCorp reserves its right to request the return or destruction of any privileged or protected materials that may have been inadvertently disclosed. Please inform PacifiCorp immediately if you become aware of any inadvertently disclosed information.

OEIS Data Request 1.2

Regarding the Scope of Work Orders:

On page 314 of its 2026-2028 Base WMP, PacifiCorp states that “specific work orders are not issued for each work location, but rather one work release is issued for the entire power line being worked.”

- a. Define “entire power line” (e.g., a circuit, a number of circuit miles, a number of spans, a circuit protection zone, etc.).
- b. Define “work release.”
- c. Explain how PacifiCorp divides a “work release” into its components (e.g., work locations, spans, trees, etc.).

Response to OEIS Data Request 1.2

- a. With respect to the distribution system, “entire power line” typically refers to an entire distribution circuit; with respect to the transmission system, “entire power line” typically refers to an identifiable segment of a transmission line, usually made in reference to the two substations at each end of the segment.
- b. “Work release” is a document used to issue or “release” a specific work project to contractors, integrating the terms and conditions of the master contract referenced in the work release.
- c. A work release is typically not divided into more granular components. After a work release is issued, an inspector identifies work and work locations, which are documented using mobile data management software (MDMS). In practice, the inspector places a “pin” on a digital map using a tablet and attaches an inventory form to the pin. Each “pin” represents a work location, which may be comprised of a property, span, or individual trees. Each work location is “open” until recorded as complete within the MDMS by attaching a work complete form to the “pin” where work completed is recorded.

OEIS Data Request 1.3

Regarding PacifiCorp's Updated Mobile Data Management System:

On page 314 of its 2026-2028 Base WMP, PacifiCorp states that it “does not have a formal system for tracking ‘open’ work locations through time; however, ‘open’ work locations may be identified through a comparison of inventories to work complete records. This may change through implementation of PacifiCorp's updated MDMS.” 2

- a. Describe how PacifiCorp has or will update its MDMS system to allow it to track open and completed work orders.

Response to OEIS Data Request 1.3

PacifiCorp's updated mobile data management software (MDMS) will provide increased connectivity, relative to the current MDMS, between work identified by inspectors and completion of this work. Within the new MDMS, PacifiCorp will be able to create a work job, which is a grouping of work units, and the work job cannot be closed until all work units are completed or set on “Hold” and all applicable workflow functions completed. Through this increased connectivity and work management workflow requirements, PacifiCorp anticipates increased accuracy regarding tracking of prescribed work through completion. The initiative to implement the new software is initiative “Implement new vegetation management work management software” in Table 12-1 of the 2026-2028 Wildfire Mitigation Plan filed July 11, 2025.

OEIS Data Request 1.4

Regarding Compliance with GO 95, Rule 18B Corrective Action Timelines:

On page 315 of its 2026-2028 Base WMP, PacifiCorp states that “at present, work locations are not formally assigned priorities. This may change with the implementation of PacifiCorp’s updated MDMS.”

- a. Explain how PacifiCorp’s vegetation management and inspections programs comply with GO 95, Rule 18-B, which requires that an “auditable maintenance program must include...a timeline for corrective actions to be taken following the identification of a potential violation of GO 95 or a Safety Hazard on the company’s facilities.”³
- b. Explain how PacifiCorp complies with GO 95, Rule 18-B1, which requires PacifiCorp to “undertake corrective actions within the time periods stated for each of the priority levels set forth” in Rule 18-B1.

Response to OEIS Data Request 1.4

- a. PacifiCorp’s vegetation management program complies with GO 95, Rule 18, because the program design contemplates corrective action of a vegetation condition within contemplated timeframes, on a categorical basis. First, a Level 1 condition is corrected immediately. Due to the need for an immediate response, the work location is communicated directly to PacifiCorp or other appropriate operations personnel; in other words, the work location does not need to be assigned a priority within the mobile data management software (MDMS) system, because the mobile data management software MDMS system is used to track more extended work flows. Second, the manner in which work is organized, with tree crews following the inspector identifying work on a particular circuit, incorporates a plan assumption that corrective action on all Level 2 and Level 3 conditions will be completed within six months. Because all vegetation work flow is completed at the same time, it is not necessary to delineate priority for work locations which may have a longer timeline (e.g. 12 months, 36 months or 60 months) for any corrective action required under Rule 18.
- b. Please see the response to subpart (a).