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Re: CA 2025-WMPs
OEIS-P-WMP_2025-PC-02

Please find enclosed PacifiCorp's responses to OEIS data requests 2.1-2.6.

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

Sincerely,

_____/s/_____
Pooja Kishore
Manager, Regulation

OEIS Data Request 2.1

Regarding Wood and Slash Management Benchmarking: On page 294 of PacifiCorp's 2026-2028 Base WMP, PacifiCorp states, "PacifiCorp will benchmark debris management data collection with other California utilities to learn how other utilities conduct and track debris management. The information gathered will be used to inform potential changes in PacifiCorp's process and additions to PacifiCorp's new work management software, GeoDigital, expected to be released for full rollout in the first quarter of 2026". Additionally, in Table 9-1 of its 2026-2028 Base WMP (VM-12), PacifiCorp indicates that it will benchmark debris management data collection with other California utilities during each year of the WMP cycle.

- (a) Provide the number of benchmarking activities that will occur each year of the WMP cycle.
- (b) Provide a description of the benchmarking activities, including the methods by which they will be conducted (e.g., in-person meetings, virtual sessions, or procedural reviews) and the specific topics to be covered during each activity.
- (c) List each California utility that PacifiCorp plans to benchmark with.
- (d) Describe the anticipated outcomes from these benchmarking activities for each year of the WMP cycle.

Response to OEIS Data Request 2.1

- (a) PacifiCorp will conduct one benchmarking event with other California utilities in 2026. The additional ongoing activities in 2027 and 2028 identified in Table 9-1 were intended to depict the ongoing coordination between PacifiCorp and other California utilities that will include discussion topics such as debris management.
- (b) PacifiCorp currently participates in recurring virtual sessions with some California utilities and anticipates using these forums to discuss debris management or other methods such as email (survey questions). Topics may include procedural review, contractor responsibilities, and data management (what data points are collected regarding debris management). Discussion points and benchmarking methods will be developed at a future date.
- (c) PacifiCorp will identify utilities that agree to participate when the benchmarking activity begins in 2026.
- (d) The primary benchmarking activity is anticipated to take place in 2026. PacifiCorp expects to obtain a greater understanding of how other utilities implement their debris management activities and specifically, how they track these activities using a data

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management system or other means (to the extent that it is tracked). PacifiCorp may then identify potential improvements to its mobile data management system.

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 2.2

Regarding PacifiCorp's Pole Clearing PRC 4292 (DPL) VM-05 Target: In Table 9-2 of PacifiCorp's 2026-2028 Base WMP (VM-05), PacifiCorp uses the acronym "DPL".

(a) Provide PacifiCorp's definition of "DPL".

Response to OEIS Data Request 2.2

(a) "DPL" is an acronym for distribution pole clearing, which represents pole clearing activities conducted in accordance with Public Resources Code (PRC) 4292.

OEIS Data Request 2.3

Regarding PacifiCorp's Vegetation Work Management Software: On page 440 of PacifiCorp's 2026-2028 Base WMP, PacifiCorp states, "Vegetation Management is also replacing its work management system for managing vegetation. This initiative is in Table 12-1." Table 12-1 indicates that PacifiCorp will "Implement" the new vegetation management work management software in 2026.

- (a) Provide an overview of the capabilities of the new vegetation management work management software.
- (b) Identify and describe any new capabilities the software offers that were not available in PacifiCorp's previous system.

Response to OEIS Data Request 2.3

- (a) PacifiCorp is planning to complete the rollout of the new vegetation work management software in 2026. This software solution is a work management software used to track work through workflow processes from inspection through completion and post audit. Similar to PacifiCorp's current mobile data management software (MDMS), data is accessible through the development of standard reports and search functionality.
- (b) The software provides additional capabilities or improvements compared to the current software, including:
 - Increased connectivity between work identified during inspection and work completed by vegetation maintenance contractors to minimize data discrepancies.
 - Improved tracking functionality of quality assurance/quality control activities conducted by vegetation management contractors and PacifiCorp.
 - Increased workflow management and control including issuance of work from PacifiCorp to vegetation management contractors and from vegetation management contractors to their staff to create opportunities for operational efficiencies.

OEIS Data Request 2.4

Regarding PacifiCorp's Pole Clearing Targets (VM-05): On page 266, Table 9-2, of PacifiCorp's 2026–2028 Base WMP, PacifiCorp lists “distribution poles” as the target unit for its Pole Clearing PRC 4292 (DPL) and Pole Clearing (LRA) targets.

- (a) Clarify whether transmission poles/structures are included in these targets.
- (b) If transmission poles/structures are not included in these targets, explain why.

Response to OEIS Data Request 2.4

- (a) These initiatives are focused on distribution poles, however, some transmission structures are included in the targets, typically those structures with distribution under-build.
- (b) Not applicable.

OEIS Data Request 2.5

Regarding Wildfire Likelihood: On page 76 of PacifiCorp's 2026-2028 Base WMP, PacifiCorp implies that the terms "Wildfire Likelihood" and "Expected Risk" are interchangeable. However, the calculation provided for Wildfire Likelihood on page 76 differs from the Expected Risk calculation provided on page 492.

- (a) Explain the reason for the differences in the two equations and/or terms.

Response to OEIS Data Request 2.5

- (a) The reason for the difference in the equations on page 76 and page 492 is due to an error. The equation on page 76 is how PacifiCorp calculates the fuel/terrain and wind scores, while the equation on page 492 is how Techno-sylva, the model vendor, calculates the expected risk simulation output. In response to this error, PacifiCorp has updated section 5.2.2.1 in the Company's errata, PC_2026-2028_Base-WMP_R1 that will be filed July 25, 2025, to correctly reflect the wildfire likelihood calculations.

OEIS Data Request 2.6

Regarding Risk Attributes: On page 74 of PacifiCorp's 2026-2028 Base WMP, Figure 5-2 shows the schematic for the FireSight calculations. In the RAVE and RAIL outputs for the schematic, several components included in the Wind Risk and Fuel/Terrain Risk Calculation (Figure PAC 5-4, page 73) are excluded in the path to "R2: Ignition Risk F: Composite Risk" (the orange arrows). For example, "Buildings Destroyed" is included in the calculation. However, this feature is not connected (via orange line) to the final output of the schematic.

- (a) Explain whether these excluded components are an error in Figure 5-2, or an error in the selected attributes for the calculation in Figure PAC 5-4.
- (b) If it is not an error, explain why the excluded components are not connected.

Response to OEIS Data Request 2.6

- (a) The components excluded from Figure 5-2 were in error. There should be arrows drawn from the variables included in the Wind Risk and Fuel/Terrain Risk Calculation to the "R2: Ignition Risk F: Composite Risk" box. PacifiCorp has updated Figures PAC 5-4 and B-1 in the Company's errata, PC_2026-2028_Base-WMP_R1 that will be filed July 25, 2025.
- (b) Not applicable.