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Re: CA 2025-WMPs
OEIS-P-WMP_2025-PC-04

Please find enclosed PacifiCorp's responses to OEIS data requests 4.1-4.13. Also provided are Attachments OEIS 4.6 and 4.10.

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

Sincerely,

_____/s/_____
Pooja Kishore
Manager, Regulation

OEIS Data Request 4.1

Regarding the Time Period to Address Immediate Vegetation Threats to Safety or Reliability: In its response to Question 04 of Data Request OEIS-P-WMP_2025-PC-01, PacifiCorp states that it corrects “a Level 1 condition...immediately.”¹ GO 95, Rule 18(B)(1)(a)(i) defines a Level 1 condition as “an immediate risk of high potential impact to safety or reliability.”² Define “immediately” as it applies to correcting the following conditions:

(a) Transmission infrastructure:

- i. Vegetation is likely to imminently contact electric facilities.
- ii. Vegetation shows evidence of contact with electric facilities.
- iii. Vegetation is contacting electric facilities.

(b) Distribution infrastructure:

- i. Vegetation is likely to imminently contact electric facilities.
- ii. Vegetation shows evidence of contact with electric facilities.
- iii. Vegetation is contacting electric facilities.

Response to OEIS Data Request 4.1

(a) Transmission infrastructure:

- i. Vegetation Management will typically respond to a condition where vegetation is likely to imminently contact electric facilities within a 24-hour period and initiate corrective actions to mitigate the condition. Depending on the scenario coordination efforts may need to involve other departments.
- ii. Vegetation Management will typically respond to a condition where vegetation shows evidence of contact with electrical facilities within a 24-hour period and initiate corrective actions to mitigate the condition. With this condition type coordination efforts will need to involve other departments to safely mitigate.
- iii. When vegetation is in contact with electric facilities, Vegetation Management will assist with the response, typically, within a 24-hour period to initiate corrective actions to mitigate the condition. Vegetation conditions in direct

¹ PacifiCorp, Response to Data Request OEIS-P-WMP_2025-PC-01 Question 4, Published July 18, 2025, URL:(<https://efiling.energy.ca.gov/eFiling/Getfile.aspx?fileid=58952&shareable=true>).

² California Public Utilities Commission, Rules for Overhead Electric Line Construction, Revised December 19, 2024, pages I-8 to I-11, URL:(<https://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M550/K438/550438485.pdf>).

contact with electric facilities require other departments to make safe before Vegetation Management can proceed.

(b) Distribution infrastructure:

i. Vegetation Management will typically respond to a condition where vegetation is likely to imminently contact electric facilities within a 24-hour period and initiate corrective actions to mitigate the condition. Depending on the scenario coordination efforts may need to involve other departments.

ii. Vegetation Management will typically respond to a condition where vegetation shows evidence of contact with electric facilities within a 30-day period and initiate corrective actions to mitigate the condition. Depending on the scenario coordination efforts may need to involve other departments.

iii. When vegetation is in contact with electric facilities, Vegetation Management will assist with the response typically within a 24-hour period to initiate corrective actions to mitigate the condition. Vegetation conditions in direct contact with electrical facilities require other departments to make it safe before Vegetation Management can proceed.

OEIS Data Request 4.2

Regarding Record Keeping for Immediate Vegetation Threats to Safety or

Reliability: In its response to Question 04 of Data Request OEIS-P-WMP_2025-PC-01 PacifiCorp states that, “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”.

Does PacifiCorp have a management system in place to keep records of Level 1 conditions it corrects?

- i. If yes, describe the management system in place.
- ii. If no, describe:
 1. Why PacifiCorp does not keep a record of Level 1 conditions it previously corrected.
 2. What plans PacifiCorp has, if any, to keep a record of Level 1 conditions it previously corrected.

Response to OEIS Data Request 4.2

- i. PacifiCorp does not have a management system in place to keep records of Level 1 conditions it corrects.
- ii. Please see responses below.
 1. PacifiCorp’s vegetation management program is designed to address Level 1 conditions promptly. PacifiCorp tracks the completion of work activities conducted; however, the current work tracking capabilities do not differentiate Level 1 conditions from other conditions. Level 1 conditions may be tracked through the local PacifiCorp forester. The forester is notified of Level 1 type conditions and may coordinate with the vegetation management contractor through mitigation of the condition to ensure timely completion.
 2. PacifiCorp is planning to incorporate capability to assign work prioritization within its new Mobile Data Management Systems (MDMS). Please refer to response to question 3 of this data request.

OEIS Data Request 4.3

Regarding the Incorporation of Risk-Based Prioritization Criteria into PacifiCorp's Mobile Data Management System (MDMS): On page 520 of its 2026-2028 Base WMP, PacifiCorp states, "To address PC-23B-16 PacifiCorp will develop work prioritization to incorporate within its MDMS applicable to specific work activities."¹

- (a) Describe the process of incorporating risk-based prioritization criteria into PacifiCorp's MDMS application.
- (b) By 2027, does PacifiCorp plan to operationalize risk-based work prioritization so that inspectors, tree crews, and others can assign priority to specific work locations?
 - i. If yes, describe any obstacles that may prevent incorporating risk-based prioritization criteria into its MDMS.
 - ii. If no, when does PacifiCorp plan to operationalize risk-based work prioritization?

Response to OEIS Data Request 4.3

- (a) PacifiCorp is developing a means to incorporate work prioritization capability within the new Mobile Data Management System (MDMS) software. The process is expected to be iterative to ensure prioritization, tracking and reporting functionalities are working properly within the MDMS. Process for incorporation requires collaboration with the MDMS vendor and developing new workflow elements within the MDMS.
- (b)
 - i. Yes, PacifiCorp is planning to operationalize work prioritization capabilities by 2027. Obstacles that may prevent this include delays in the implementation of the new software which may impact the timeline of implementation of risk-based work prioritization, or any unforeseen limitations within the new MDMS software.
 - ii. N/A.

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>).

OEIS Data Request 4.4

Regarding Weather Station Totals: On page 327 of its 2026-2028 Base WMP, PacifiCorp states that, “PacifiCorp owns and operates a network of weather stations....”.

Provide the total number of weather stations (MicroStations, remote automated weather station (RAWS), and portable stations) in the PacifiCorp network across the California service area.

Response to OEIS Data Request 4.4

PacifiCorp has 122 total weather stations in its California service area (111 micro-stations, one remote automated weather station (RAWS) and ten portable weather stations).

OEIS Data Request 4.5

Regarding Vegetation Management Activities Based on Weather Conditions:

On page 299 of its 2026-2028 Base WMP, PacifiCorp states that it "plans and executes operational changes to address wildfire risk during elevated fire weather conditions indicating increased ignition likelihood and wildfire potential".

- (a) Describe the factors that trigger vegetation management operational changes (e.g., the fire potential index, fire weather watch conditions, red flag warning conditions, USFS Project Activity Level, etc.).
- (b) Describe operational changes that vegetation management employees make to reduce the risk of ignition from vegetation management operations (e.g., ceasing the use of spark-producing equipment, patrolling non-HFTD locations, avoiding off-road travel, etc.).

Response to OEIS Data Request 4.5

- (a) All factors noted in this question represent general examples of when operational changes would be needed. PacifiCorp utilizes a contractor workforce for vegetation management which coordinates with fire agencies to ensure compliance with changing conditions and requirements.
- (b) PacifiCorp utilizes a contractor workforce for vegetation management maintenance activities that coordinate with fire agencies to ensure compliance with changing conditions and requirements. These agencies conduct random site visits to ensure compliance with use of appropriate tools, and that fire suppression equipment is on site and operational. Work is typically scheduled in advance to minimize these contract crews working in off-road locations.

OEIS Data Request 4.6

Regarding PacifiCorp's Substation Defensible Space Management Program:

On page 295 of its 2026-2028 Base WMP, regarding substation defensible space, PacifiCorp states, "There are no specific operating procedures provided for contractors. Substation inspections follow substation inspection procedures." Additionally, PacifiCorp states, "...substation inspections as described in Section 8.3.4 determine where vegetation may pose a current or future risk to substation equipment." In its review of Section 8.3.4 of PacifiCorp's 2026-2028 Base WMP and its Substation Inspection Asset Management Policy No. 034, Energy Safety did not identify language specific to the inspection of vegetation within substation properties.

- (a) Provide procedural document(s) which require inspectors to perform vegetation inspections within substation properties.
 - i. If procedural documents do not exist, provide any plans PacifiCorp has to create procedural document(s) that are specific to the inspection of vegetation within substation properties.
- (b) Explain PacifiCorp's decision-making process for not creating operating procedures specific to substation defensible space management work within substation properties.
- (c) Provide any plans PacifiCorp has to develop operating procedures specific to substation defensible space management work within substation properties.

Response to OEIS Data Request 4.6

- (a) PacifiCorp Asset Maintenance and Compliance Policy 001 directs performance of substation facilities in California eight times per year and 12 times per year for NERC (FAC-501 Critical Path Standard) substations including inspections of substation yard conditions to ensure it is free of weeds, nests, and debris as well as inspecting vegetation clearance at the fence line to ensure there is no climbable or overhanging vegetation inside the substation fence. Substation security Form 3274S is completed as part of each inspection and is included as Attachment Attach OEIS 4.6. Form 3274S is used across all of PacifiCorp's six-state service areas.

In an effort to keep substation facilities weed-free, PacifiCorp contracts a third-party contractor to spray facilities annually, and as needed, to maintain them in weed-free condition. In the event weeds are identified by PacifiCorp during a routine substation inspection, the contractor is contacted, and they will address these situations on a case-by-case basis.

- (b) While a specific procedure has not been developed for defensible space, the combination of the regular vegetation removal described in Section 9.6.2 and the substation inspections as described in Section 8.3.4 of the 2026-2028 Wildfire Mitigation Plan have provided adequate defensible space for substation equipment for at least five fire events where the fire reached the substation fence line but did not encroach into the substation and no damage was observed inside the substation.
- (c) PacifiCorp has no plans at this point to develop operating procedures specific to substation defensible space management.

OEIS Data Request 4.7

Regarding PacifiCorp's Workforce Planning Qualitative Target: On page 264 of its 2026-2028 Base WMP, PacifiCorp provides a qualitative target for Workforce Planning (VM-15): "Vegetation Management and Inspections: Develop and implement formal inspection contractor benchmarking processes." On page 321 of its 2026-2028 Base WMP, PacifiCorp states that its VM-15 qualitative target aims to "drive consistency among inspection contractors."

- (a) For each year of the 2026-2028 Base WMP cycle, provide the number of activities PacifiCorp will dedicate to:
 - i. Developing inspection contractor benchmarking processes.
 - ii. Implementing inspection contractor benchmarking processes.
- (b) Provide a description of how PacifiCorp will implement inspection contractor benchmarking sessions (e.g., in-person meetings, online meetings, field days, etc.).
- (c) List the topics that each benchmarking session will cover.
- (d) List the collaborators PacifiCorp plans to benchmark inspection processes with (e.g., other electrical corporations, academics, consultants, etc.).
- (e) Describe the anticipated outcomes from implementing formal inspection contractor benchmarking processes for each year of the WMP cycle.

Response to OEIS Data Request 4.7

- a)
 - i. 2026 – Develop standard benchmarking procedure to include topics that are strategic to meet PacifiCorp Transmission & Distribution Vegetation Management Program Standard Operating Procedures and drive consistency among inspection contractors. Assess and include any trends that need improvement or adjustments.
 - ii. 2026 – Utilize standard benchmarking procedure to continue benchmarking activities and complete benchmark trainings in second and third quarter of 2026. Assess benchmarking process after the second quarter benchmark training to determine any adjustments in the process.
2027 – Conduct benchmarking activities in the second, third and fourth quarters.
2028 – Conduct benchmarking activities in the second, third and fourth quarters.

- b) Contractor benchmarking sessions may include either in-person meetings, online meetings or field days depending on the topics to be covered during each benchmark training. Implementation may include a review of various inspection procedures or current trends or topics that need to be included in the benchmark training. A benchmark agenda will be created to document topics that will be covered during the meeting. If the meeting is in the field, an area on a distribution feeder or transmission line will be selected that will facilitate review of identified topics or procedures. Inspectors will be required to assess area and a PacifiCorp forester or manager and/or an inspection contractor supervisor will have discussions on topics covered in the area reviewed to ensure inspectors receive consistent direction or feedback. Online meetings will include an agenda of topics or trends to be reviewed. In-person meetings may have verbal or written feedback on procedures reviewed.
- c) Topics may include but are not limited to procedures in the PacifiCorp Transmission and Distribution Vegetation Management Program Standard Operating Procedures or current trends and topics that require training or review. Topics may include tree growth rates and assessing clearances, proper tree selection, feeder or transmission line specifications, tree removals, clean-up specifications, hazard tree identification, customer relations, data entry, progress and other topics of importance.
- d) Other collaborators may include the tree contractor supervisors/management, tree growth regulator contractors, state, or federal agency representatives, etc.
- e) 2026 – Formalize standard benchmarking procedure and utilize procedure in the second quarter benchmark to assess effectiveness of procedure. Utilize findings to make any adjustments to the procedure for third quarter benchmark training.
2027 – Consistency in benchmarking procedures and inspections. Benchmark training may increase effective communication and clarification on inspection procedures. Documented training can be utilized to review if there is diversion from inspection procedural consistency.
2028 – Continued benchmark trainings to drive consistency with new or tenured inspectors, provide training on any procedural changes and increase quality of inspection data.

OEIS Data Request 4.8

Regarding Integrated Vegetation Management Qualitative Targets:

On page 264 of its 2026-2028 Base WMP, PacifiCorp provides two qualitative targets for its Integrated Vegetation Management initiative (VM-14).

- (a) One qualitative target PacifiCorp provides is to “develop a process for conducting outreach to known nurseries participating in the tree replacement program”.
 - i. For each year of the 2026-2028 Base WMP cycle, detail steps PacifiCorp will take to develop a nursery outreach process.
 - ii. When does PacifiCorp plan to implement the process itself (i.e., transition from process development to implementation)?
 - iii. Describe how a process for nursery outreach will advance PacifiCorp’s tree replacement program.
 - iv. Describe what metrics PacifiCorp will track to determine the effectiveness of its new nursery outreach process?
- (b) A second Integrated Vegetation Management target PacifiCorp provides is to “review and identify opportunities to expand use of tree growth regulator”.
 - i. Describe in detail the types of opportunities PacifiCorp will review to inform its expansion of tree growth regulator applications.
 - ii. Describe in detail how PacifiCorp will identify locations and tree species that are most compatible with tree growth regulator applications.
 - iii. For each year of its 2026-2028 Base WMP cycle, indicate the number of opportunities PacifiCorp hopes to identify for its expanded use of tree growth regulators.

Response to OEIS Data Request 4.8

- a. i. 2026 – 1) Identify nurseries that have participated in the tree voucher program, 2) Develop talking points and a handout to be used during outreach, 3) Identify geographical areas where there are no participating nurseries, 4) Determine if a nursery is present in the area and determine if the nursery should be approached to participate in the program

2027 – Initiate contact/outreach with nurseries either through in-person or telephone conversations describing the voucher program and expectations, mail or email the handout (overview of voucher program)

2028 – Conduct outreach as implemented in 2027 and determine frequency of ongoing outreach moving forward

ii. Please refer to the response to subpart (a)(i) of this question. PacifiCorp may modify this approach to initiate outreach sooner, but no later than 2027.

iii. Through outreach with nurseries, PacifiCorp anticipates the nurseries to have a greater understanding of the program requirements and likelihood of continuing to participate moving forward.

iv. The outreach planned is intended to be informative and educational, to help ensure that the participating nurseries understand the tree voucher process. PacifiCorp will send the participating nurseries a brief survey after outreach is conducted to assess their understanding of the process. Survey results will be used to inform the frequency of outreach moving forward.

b. i. PacifiCorp will continue to review all distribution circuits scheduled for annual routine cycle work to determine if there are proper candidates for tree growth regulator work. Circuits in additional districts that did not have previous tree growth regular work will be included for work if circuits are good candidates with fast-grow tree species.

ii. Inspectors will document trees that are fast-growing which are potential candidates for tree growth regulator work. Trees or work locations identified as tree growth regulator candidates, will be able to be queried within the new Mobile Data Management System (MDMS) and/or assessed by vegetation management personnel or tree growth regulator contractor to further determine if the trees are good candidates for tree growth regulator application. Before initiating tree growth regulator work, tree growth regulator contractor, will review trees documented to identify trees that are most compatible for tree growth regulator applications. The tree growth regulator contractor will also identify trees for application while in the field.

iii. PacifiCorp has not quantified the number of opportunities for expanded tree growth regulator application. As described above, during inspection, candidate trees are identified by inspectors and then further reviewed by the tree growth regulator contractor. In addition, the tree growth regulator contractor may conduct further inspection of areas to identify candidate trees for application.

OEIS Data Request 4.9

Regarding Analysis of Emergency Resources for Responding to Faults and Ignitions

In pages 520-522 of its 2026-2028 Base WMP, PC-25U-10 Emergency Resources for Responding to Faults and Ignitions, PacifiCorp was required to provide an analysis of its prevention and suppression resources throughout its California service territory. PacifiCorp responded that, “By the end of 2028, PacifiCorp will discuss with other utilities their approach to fire prevention and suppression equipment to assess the Company’s adequacy of resources when responding to faults or suppressing ignitions.”

- (a) Explain if PacifiCorp intends to “discuss with other utilities their approach to fire prevention and suppression equipment” in 2026 or 2027.
- (b) Explain PacifiCorp’s decision-making process for “discuss[ing] with other utilities their approach to fire prevention and suppression equipment” by the end of 2028.
- (c) Explain PacifiCorp’s plan, with a timeline, for gathering the information it needs to produce the analysis of its prevention and suppression resources in California.
- (d) If PacifiCorp intends to “discuss with other utilities” by the end of 2028, when does PacifiCorp expect it will be able to produce the analysis of its prevention and suppression resources in California?

Response to OEIS Data Request 4.9

- a. PacifiCorp intends to, and has begun, evaluating both California investor-owned utilities (IOUs) and other IOUs’ practices for prevention and suppression.
- b. PacifiCorp’s California service area and customer base is very small in comparison to peer IOUs and their suppression programs, especially as it relates to aerial fleet, are high-cost programs.

Based on the amount of time and experience the California IOUs have in their partnerships and programs, PacifiCorp has an opportunity to evaluate their programs for best practices and lessons learned, effectiveness, and cost benefit ratios across the strategies. Additionally, it would be prudent for the Company to consider any areas where there are opportunities for partnership to minimize the program costs.

PacifiCorp has an obligation to develop a strategic, effective approach that limits rate impacts to its small customer base in California, which can be done by providing value and cost sharing with other states or partners.

- c. PacifiCorp has started comprehensive engagement with utility partners in California, Berkshire Hathaway Energy, and across the Pacific Northwest regarding their wildfire response, suppression and prevention programs.

PacifiCorp intends to complete this evaluation by the end of 2026 and allow the company to formalize any new program elements in 2027.

- d. PacifiCorp is confident that current staffing, equipment and processes meet requirements for emergency resources for responding to faults and ignitions and has expanded wildfire response programs. This analysis will be expanding other types of suppression and prevention programs in addition to the current resources and processes in place such as the Wildfire intelligence Center and the Wildfire and Emergency Response team as discussed on pages 390-392 of the 2026-2028 Base Wildfire Mitigation Plan.

As noted above, PacifiCorp intends to produce analysis in 2027.

OEIS Data Request 4.10

Regarding Terrain Score, Wind Score, and Percent of Overall Utility Risk: Provide the name, length (in circuit miles), Terrain Score, Wind Score, and percentage of overall utility risk, of each circuit in PacifiCorp's service territory in the following format:

Circuit	Terrain Score	Wind Score	Percent of Overall Utility Risk	Length (circuit miles)

Response to OEIS Data Request 4.10

Please see Attach OEIS 4.10 for the list of circuits in PacifiCorp's service territory. Consistent with Table 5-5 in the 2026-2028 Base Wildfire Mitigation Plan, risk model Version 0.1.0 was used to calculate the risk scores.

OEIS Data Request 4.11

Regarding Line Rebuild, Covered Conductor Installation and Undergrounding: On page 170 of its 2026-2028 Base WMP, PacifiCorp states that “under the line rebuild program, PacifiCorp is also considering undergrounding” and “the company evaluates the potential to convert overhead lines to underground lines for rebuild projects on a project-by-project basis.”

- (a) With the understanding that undergrounding is performed on a project-by-project basis, has PacifiCorp completed a preliminary evaluation of probable undergrounding projects?
 - i. If so, provide the circuit name and circuit-length of the undergrounding work.
 - ii. Does PacifiCorp have undergrounding mileage targets for 2026, 2027 and 2028? If so, provide the target for each year.
- (b) Provide how many miles of undergrounding of electric lines PacifiCorp has performed within its HFTD and HFRA, broken down by year, between 2022, 2023, and 2024.

Response to OEIS Data Request 4.11

- a)
 - i. The circuits scoped for underground work are:
 - 5G79: Approximately four circuit miles of scoped underground work.
 - 5G93: Approximately 4.8 circuit miles of scoped underground work.
 - 5G165: Approximately 0.4 circuit miles of scoped underground work.
 - 8G95: Approximately 0.5 circuit miles of scoped underground work.
 - ii. The 9.7 miles listed under part 11(a) of this response are currently planned for 2026. These projects have completed preliminary design milestones but still require permits and rights of way to be secured before construction can occur. Delays in permitting or receipt of the needed rights of way could delay construction on these projects past 2026.
PacifiCorp scopes circuits based on risk score and evaluated the circuit to determine if there are areas that should be converted from overhead to underground. The circuits planned for construction in 2027 and 2028 remain in planning at this time, therefore no specific number of underground miles have been recommended.

b) Please refer to the graph below.

Year	HFTD Circuit miles	HFRA Circuit miles	Total Circuit miles	Circuits
2022	1.3	0	1.3	5G40
2023	4.7	0	4.7	5G40, 5G79, 5G83
2024	0.1	0	0.1	5G40
Totals	6.1	0	6.1	

OEIS Data Request 4.12

Regarding Table 4-1 High-Level Service Territory Components: Provide the following service territory components broken down by HFTD Tier 2 or Tier 3, and Non-HFTD:

Characteristic	HFTD Tier 2	HFTD Tier 3	Non-HFTD	Total
Hardened overhead transmission lines (circuit miles)				
Hardened overhead distribution lines (circuit miles)				
Substations (#)				
Power generation facilities (#)				
Distribution transformers (#)				
Reclosers (#)				
Poles (#)				
Microgrids (#)				

Response to OEIS Data Request 4.12

Please refer to the table below.

Characteristic	HFTD Tier 2	HFTD Tier 3	Non-HFTD	Total
Hardened overhead transmission lines (circuit miles)	0	0	0	0
Hardened overhead distribution lines (circuit miles)	201	45	0.7	246.7
Substations (#)	27	2	30	59
Power generation facilities (#)	1	0	0	1
Distribution transformers (#)	8,264	667	12,630	21,561
Reclosers (#)	36	1	48	85
Poles (#)	23,471	1,422	44,715	69,608
Microgrids (#)	0	0	0	0

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 4.13

Regarding Distribution and Transmission Pole Wraps: On page 173 of its 2026-2028 Base WMP, PacifiCorp states that “depending on the pole configuration and location, the company may also install a fire mesh wrap around both transmission and distribution wooden poles in areas of heightened wildfire risk” and “pole wraps may also be applied on poles scoped for replacement with steel poles as an interim solution.”

- (a) Provide how many distribution pole wraps PacifiCorp has installed within its HFTD and HFRA, broken down by year, between 2022, 2023, and 2024.
- (b) Provide how many transmission pole wraps PacifiCorp has installed within its HFTD and HFRA, broken down by year, between 2022, 2023, and 2024.
- (c) With the understanding that PacifiCorp’s pole wrap program is an interim solution for distribution and transmission hardening, can PacifiCorp provide targets for its GH-15 activity for 2026, 2027, and 2028?
 - i. If so, provide targets for distribution pole wraps and transmission pole wraps.

Response to OEIS Data Request 4.13

- a. Prior to 2025, pole wraps were primarily installed as a reactive measure if/when an active wildfire was nearing PacifiCorp’s system. As such, these locations were not tracked or mapped, and the locations were based more on local knowledge and need at the time. Starting in 2025, PacifiCorp has committed to recording the location of installed pole wraps installed in 2025 and beyond.
- b. Please see the response to 13a.
- c. PacifiCorp is currently evaluating the effectiveness of pole wraps during active wildfires to best determine the ideal locations to install protective wrapping on wood poles. This information will be used to establish guidelines and target specific areas based on surrounding fuels and terrain where the wraps will be most effective in preventing damage to wood poles.
 - c. i. At this time, no specific targets have been established; however, PacifiCorp does not anticipate a measurable change in the targeted spending put forth in the current 2026-2028 Wildfire Mitigation Plan.