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Re: CA 2025-WMPs  
OEIS-P-WMP\_2025-PC-05

Please find enclosed PacifiCorp's responses to OEIS data requests 5.1-5.4. Also provided is Attachment OEIS 5.3.

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

Sincerely,

\_\_\_\_\_/s/\_\_\_\_\_  
Pooja Kishore  
Manager, Regulation

## **OEIS Data Request 5.1**

**Regarding Inconsistent Circuit Mile Values for Off-Cycle (Patrol) Transmission Inspection Target and Audit:** On page 266 of its 2026-2028 Base WMP, PacifiCorp indicates that it targets 142 miles in 2028 for its “Off-Cycle (Patrol) Inspection – Transmission (FIT)” activity. On page 309 of its 2026- 2028 Base WMP, PacifiCorp indicates it will audit 417 miles of its “Off-cycle Transmission (Patrol).” For 2026 and 2027, the total number of target and audit miles are identical, and so it is unclear why the total number of target and audit miles are not identical in 2028.

- (a) Explain why the number of miles for Off-Cycle Transmission (Patrol) is not the same in Tables 9-2 and 9-6 for 2028.

## **Response to OEIS Data Request 5.1**

- (a) The target in Table 9-2 for Off-Cycle (Patrol) Inspection – Transmission (FIT) is an error and should be 417 miles. The quarterly targets would also be adjusted to reflect the correct annual target of 417 miles.

## OEIS Data Request 5.2

**Regarding Quality Control of Transmission Routine Vegetation Management:** On page 281 of its 2026-2028 Base WMP, PacifiCorp states that it “has separated main grid (VM-02) transmission and local (VM-02) transmission into distinct initiatives due to the difference in frequency of inspections....” On page 266 of its 2026-2028 Base WMP PacifiCorp sets quarterly targets for both Routine (Detailed) Inspection – Local Transmission and Routine (Detailed) Inspection – Main Grid. However, in Table 9-6: Vegetation Management QA and QC Activity Targets, PacifiCorp does not provide targets for auditing local and main grid routine transmission inspection and/or pruning and removal work.

- (a) Does PacifiCorp plan to audit routine transmission inspection and/or pruning and removal work?
  - i. If yes, provide all Table 9-6 information as it pertains to audit(s) of routine transmission inspection and/or pruning and removal work.
  - ii. If no, explain why and how PacifiCorp checks the quality of routine transmission inspection and/or pruning and removal work.

## Response to OEIS Data Request 5.2

- (a)
  - i. In accordance with PacifiCorp’s Vegetation Management Quality Management Program Guidelines, PacifiCorp conducts quality reviews. Each year, 2026 through 2028, PacifiCorp plans to conduct a minimum of 15 quality reviews of transmission lines scheduled for routine (detailed) inspection and correction each year. At a minimum, six (40%) of the 15 quality reviews will take place in HFTD/FHCA. All audits will be given a pass/fail rating with anything 95% and above is considered a passing audit.
  - ii. N/A

### **OEIS Data Request 5.3**

**Regarding Vegetation Management Quality Program Procedure:** On page 311 of its 2026-2028 Base WMP, PacifiCorp indicates that it includes, “additional information” about its quality assurance and quality control initiative in its “Vegetation Management Quality Management Program Guidelines document dated 3/04/2025.”

- (a) Provide the latest version of PacifiCorp’s Vegetation Management Quality Management Program Guidelines.
- (b) Indicate the version or revision number and effective date of PacifiCorp’s Vegetation Management Quality Management Program Guidelines.

### **Response to OEIS Data Request 5.3**

- (a) Please refer to Attachment OEIS 5.3, which is a copy of PacifiCorp’s Vegetation Management Quality Management Program Guidelines.
- (b) The guidelines provided as Attachment OEIS 5.3 are Version 1 with an effective date of March 4, 2025.

## OEIS Data Request 5.4

**Regarding Percent Risk Reduction:** On page 138 of its 2026-2028 Base WMP, PacifiCorp states that it “is developing a framework to quantify the estimated and observed or measured effectiveness of wildfire risk mitigation activities to incorporate into an analysis of achieved and forecasted risk reduction. The company expects to complete this work in 2025 for use beginning in 2026.” PacifiCorp later states that, “Initially, this estimate of risk reduction will include only line rebuilds and system hardening through covered conductor, undergrounding, and related capital investments”.

- (a) Define what is meant by “estimated” for effectiveness in this case.
- (b) Define what is meant by “observed” for effectiveness in this case.
- (c) Define what is meant by “measured” for effectiveness in this case.
- (d) Explain when PacifiCorp will be using estimated, observed, and/or measured effectiveness for each of the respective mitigation activities (e.g., covered conductor, undergrounding, PSPS, ESS/PEDS, etc.).
- (e) Provide a detailed description of the work PacifiCorp has done as of the submittal of its 2026-2028 Base WMP to determine the effectiveness of its mitigation activities.
- (f) When does PacifiCorp intend to develop effectiveness for mitigation activities that are not line rebuilds and system hardening?

## Response to OEIS Data Request 5.4

- (a) “Estimated” effectiveness refers to a forecasted, non-empirical assumption of wildfire risk reduction based on models, simulations, engineering judgment, and historical data. It is not derived from observable or measured outputs and is outside the scope of measured effectiveness.
- (b) “Observed” effectiveness involves qualitative or visual outcomes noted during operations (e.g., reduced ignition activity or outages), but not systematically quantified. While it reflects real-world experience, it lacks the structured, objective metrics required to qualify as measured effectiveness.
- (c) Measured effectiveness refers to a performance-based metric rooted in tangible, operational data. It encompasses outcomes such as ignitions, outages, faults, and other defined risk events, relying on detailed records like event dates, circuit locations, cause categories, FHCA designation, and seasonal context. By design, it

excludes any form of modeling, extrapolation, or cost-related calculations. Instead, it serves as a foundational tool for validating the impact of wildfire mitigation efforts and shaping future strategic planning.

- (d) PacifiCorp will be using estimated effectiveness in conjunction with observed effectiveness with the next iteration of its grid hardening planning model for undergrounding and covered conductor activities (initiative GH-01). Estimated effectiveness is also being explored for vegetation management. This release is expected to go into production in the fourth quarter of 2025 and is expected to serve as the production model in 2026. During this time, PacifiCorp will explore the use of the data driven measured effectiveness values to enhance the estimated effectiveness values. As data becomes more available over time, it is expected that the measured effectiveness approach will replace the estimated effectiveness values used in the grid hardening planning model.
- (e) Since the submittal of its 2026–2028 Base Wildfire Mitigation Plan, PacifiCorp has developed and approved initial measured effectiveness methodologies for several mitigation activities, including covered conductor installations and undergrounding vegetation management inspections.
- (f) PacifiCorp has begun the process of approving measured effectiveness for several mitigation activities beyond line rebuilds and system hardening, including wildfire detection cameras (initiative SA-04), and vegetation management inspections (initiatives VM-01, VM-02). These represent an initial, foundational version of measured effectiveness, constructed using the best available tools and limited datasets. As such, they are evolving in nature and serve as a starting point for continuous refinement.

PacifiCorp recognizes that measured effectiveness is not a static benchmark but a developing framework. Current data sources, while valuable, have constraints in scope and precision. To address this, PacifiCorp has committed to an annual review and update cycle focused on identifying data gaps, improving collection methods, and enhancing methodology. This is depicted in Figure PAC 6-4 in the 2026-2028 Base Wildfire Mitigation Plan. For example, measured effectiveness for weather stations (initiative SA-01) is targeted for review by October 2025. At that time, PacifiCorp may also outline additional measured effectiveness evaluations planned for 2026.