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Re: CA 2025-WMPs
OEIS-P-WMP_2025-PC-06

Please find enclosed PacifiCorp's responses to OEIS data requests 6.1-6.4. Also included is Attachment OEIS 6.2.

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

Sincerely,

___/s/___
Pooja Kishore
Manager, Regulation

OEIS Data Request 6.1

Regarding Microgrids: On page 179 of PacifiCorp's 2026-2028 WMP, PacifiCorp states that it "performed feasibility studies for the implementation of utility interactive and islanded microgrid solutions at four remote sites serving critical radio communications infrastructure. The studies evaluated loading seasonality potential for onsite generation with photovoltaic and wind resources, storage and identified potential energy deficits requiring the use of propane, natural gas, or diesel generators."[1]

With the understanding that PacifiCorp is still evaluating the result of these studies, provide copies of the feasibility studies' reports for these four remote sites. If reports are not available, provide detailed summaries of each of the feasibility studies including the methods used and conclusions drawn.

Response to OEIS Data Request 6.1

The reports are not immediately available because the reports are proprietary to Boxpower, the consulting company which performed the study and prepared the report, and subject to confidentiality provisions in the agreement with Boxpower.

A summary of the four sites evaluated in the microgrid feasibility Sites were selected in the State of California were located in the Tier 2 and Tier 3 High Fire Threat Districts (HFTD) and in the Fire High Consequence Area (FHCA) in the State of Utah, the FHCA is similar to the High Fire Risk Area (HFRA) in California. Table 1 below shows a summary of site locations and load.

Table 1 -Site Location and Load Summary

Item	Site #1	Site #2	Site #3	Site #4
State	California	California	California	Utah
Circuit	5G16	5G16	5G171	HRR13
Overhead Circuit Miles	2	1.7	3.4	7.2
Number of Customers	6	1	2	2
Peak Demand (kW)	17.9	17.6	8.3	9.2
Average Power (kW)	2.2	2.7	1.7	6.8
Average Daily Energy Usage (kWh)	53	64	41	163
Annual Energy Usage (kWh)	19,271	23,514	14,981	59,583

Interval data from Advanced Meter Infrastructure (AMI) meters was used to assess peak demand along with daily and seasonal consumption patterns. This information was provided to a third-party vendor that used a combination of publicly available data and

[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).

commercial software to estimate site-based energy production capacity, energy storage requirements and energy deficits requiring the use of propane, natural gas, or diesel generators. This is presented in Table 2 below.

Table 2 - Preliminary Remote Grid Component Sizing and Budgetary Estimates

Item	Site #1	Site #2	Site #3	Site #4
Solar (kW)	21	25	19	51
Inverter (kW)	27	27	27	27
Energy Storage Battery (kWh)	59	61	61	177
Generator Propane (kW)	35	50	50	50
Fraction of Onsite Renewable Generation Production	70%	75%	75%	75%
Budgetary Costs Year 1 (Low)	$898,719	$790,534	$790,534	$959,109
Budgetary Costs Year 1 (High)	$1,431,702	$1,284,705	$1,284,705	$1,598,516

OEIS Data Request 6.2

Regarding Top Risk Circuits:

(a) From pages 153-158 of PacifiCorp's 2026-2028 Base WMP, provide an updated version of Table PAC 6-1: Summary of Risk Reduction for Circuits With Maximum Fuel/Terrain Wildfire Risk Scores via Excel with the following additional columns:

i. Terrain Score
ii. Wind Score
iii. Wildfire Risk Score
iv. Circuit Length (circuit miles)
v. HFTD Designation (Tier 2, Tier 3, non-HFTD HFRA, non-HFRA)
vi. 2026 Covered Conductor Planned (circuit miles)
vii. 2027 Covered Conductor Planned (circuit miles)
viii. 2028 Covered Conductor Planned (circuit miles)
ix. 2026 Undergrounding Planned (circuit miles)
x. 2027 Undergrounding Planned (circuit miles)
xi. 2028 Undergrounding Planned (circuit miles)

(b) All of the circuits in Table PAC 6-1 show "No 2027 Activities" and "No 2028 Activities".

i. Explain why these circuits currently have no planned mitigations.
ii. Provide a timeline for when PacifiCorp anticipates planning activities for 2027 and 2028.
iii. Provide a timeline for when PacifiCorp anticipates having planned activities for 2027 and 2028.

(c) PacifiCorp's response to OEIS-P-WMP 2025-PC-04 Q10 shows the same circuits with different terrain scores, wind scores, overall utility risk scores, percent of overall utility risk, and lengths than the circuits provided in Table 5-5: Summary of Top-Risk Circuits, Segments, or Spans (PacifiCorp 2026-2028 Base WMP, p. 103) and Table 6-1: Prioritized Areas in PacifiCorp's Service Territory Based on Overall Utility Risk (PacifiCorp 2026- 2028 Base WMP, pp. 122-123).

i. Explain the discrepancy between the tables and the data request response.

(d) Provide the summation for the total wildfire risk across PacifiCorp's service territory used to determine the percentage of overall utility risk in Table 6-1: Prioritized Areas in PacifiCorp's Service Territory Based on Overall Utility Risk (PacifiCorp's 2026-2028 Base WMP, pp. 122-123).

(e) Provide the summation for the total wildfire risk for circuits in PacifiCorp's non-HFTD HFRA.

Response to OEIS Data Request 6.2

(a) Please refer to Attachment OEIS 6.2 with the requested additional information.

(b)

i. With the exception of circuit 5G23 discussed below, the circuits in Table PAC 6-1 in the 2026-2028 Base Wildfire Mitigation Plan (WMP) noted with "No 2027 Activities" and "No 2028 Activities" have no planned mitigations in 2027 and 2028 because the current plan has completion of system hardening mitigations on these circuits by the end of 2026.

The remaining mitigations on circuit 5G23 have been scheduled for 2031 when a substation replacement and voltage change project can be executed concurrently with the installation of covered conductor. The highest risk segment of 5G23 is planned for the covered conductor in 2026 ahead of the substation replacement project.

ii. PacifiCorp has started scoping projects for 2027 and 2028. All planned line rebuilds projects for 2027 have been scoped as well as most of the planned 2028 line rebuild projects.

iii. As shown in Table 8-1 in the 2026-2028 WMP, PacifiCorp has the planned 2027 and 2028 line rebuild miles for initiative GH-01 established, however the specific circuits that will be executed upon are subject to change over the next 18 months as design, permitting, right of way, and material procurement activities take place.

(c)

i. The difference between the Tables 5-5 and 6-1 in the 2026-2028 Base Wildfire Mitigation Plan (WMP) and the table submitted as Attachment OEIS 4.10 in response to OEIS-P-WMP 2025-PC-04 question 10 is described below:

Tables 5-5 and 6-1 in the 2026-2028 Base WMP identifies segments in the top 5% of risk and aggregates up to the circuit using only those segments:

1) The sum of the composite scores was calculated by summing all segment composite scores, which total 12,203.17.
2) The segments were sorted by composite score in descending order.
3) The segment composite scores were summed beginning at the highest until the 5% threshold was met, which was 610.16. These segments were then labeled as being in the top 5% of risk. Using only the segments labeled as top 5% of risk is how PacifiCorp derived the mile-weighted overall utility risk scores.
4) The circuits that were identified in the top 5% of risk were aggregated up to the circuit level. This results in the values for the 16 circuits shown in Table 6-1 of the 2026-2028 Base WMP. The different columns in Table 6-1 of the 2026-2028 WMP represent the values rolled up to the circuit level using various functions (sum and maximum).

Attachment OEIS 4.10 submitted in response to OEIS-P-WMP 2025-PC-04 calculated the risk scores using the following methodology:

1) All segments on the circuit were aggregated by summing the fuel/terrain risk score, wind-driven risk score, composite risk score, and circuit miles. The final table after the aggregation has all the unique circuits in PacifiCorp's service territory. For each circuit the sum of the fuel/terrain scores is calculated across all segments of the circuit. This same process is followed for the wind-driven score, composite risk score, and the circuit miles.
2) This total was then divided by the total wildfire risk to derive the percentage of overall utility risk.

(d) The sum of the total wildfire risk across PacifiCorp's service territory used to determine the percentage of overall utility risk in Table 6-1 in the 2026-2028 Base WMP is 12,203.17. This was calculated by summing the Composite Scores for each circuit using the methodology described for 2026-2028 Base WMP Tables 5-2 and 6-1 in response to 2(c)(i) above.

(e) The sum of the total wildfire risk across PacifiCorp's service territory that is not designated as High Fire Threat District (HFTD), or High Fire Risk Area (HFRA) is 1,517.06.

OEIS Data Request 6.3

Regarding Hardening Plans: Provide a table via Excel for each grid hardening project PacifiCorp has planned for the 2026-2028 Base WMP:

i. Circuit ID
ii. Circuit Length (circuit miles)
iii. Wildfire Risk Score
iv. Terrain Score
v. Wind Score
vi. Max Terrain Score
vii. Max Wind Score Wind Score
viii. Covered Conductor (circuit miles) Planned for 2026
ix. Covered Conductor (circuit miles) Planned for 2027
x. Covered Conductor (circuit miles) Planned for 2028
xi. Undergrounding (circuit miles) Planned for 2026
xii. Undergrounding (circuit miles) Planned for 2027
xiii. Undergrounding (circuit miles) Planned 2028
xiv. Covered Conductor/Undergrounding (circuit miles) Planned in HFTD
xv. Covered Conductor/Undergrounding (circuit miles) Planned in non-HFTD HFRA

Response to OEIS Data Request 6.3

Please refer to Attachment OEIS 6.2 in response to Question 2(a) above.

OEIS Data Request 6.4

Regarding Fire Incident Tracking:

(a) On page 64 of PacifiCorp's 2026-2028 Base WMP, PacifiCorp states that "Given the limited ignition history, there may be no discernable trends in the short term, but the company will monitor and continue assessing if there is a need." Describe how PacifiCorp will determine when there is sufficient data for measuring trends from the fire incident tracker, including PacifiCorp's timeline, or data needed, for determination.

(b) On page 67 of PacifiCorp's 2026-2028 Base WMP, PacifiCorp states that the "POI model is used in lieu of statistically significant wildfire incident data resulting from electric utility assets" for determining ignition likelihood. However, in Table 5-4: Summary of Risk Models, PacifiCorp lists the fire incident database as a source of input for the contact from vegetation likelihoods (PacifiCorp Base 2026-2028 WMP, p. 96). Explain this discrepancy, including how the fire incident database is used as an input for these risk components.

(c) Explain how PacifiCorp is using the fire incident tracking database to inform lessons learned for future mitigation work (or how PacifiCorp will use the fire incident tracking database if it is not yet used to inform lessons learned for future mitigation work).

Response to OEIS Data Request 6.4

(a) PacifiCorp expects to collect three years of data before conducting a meaningful trend analysis, with measurable trends anticipated by early 2028.

(b) PacifiCorp does not yet have sufficient data to perform trend analysis for reportable fire incidents in California. As noted in the Company's response to subpart (a) above, the anticipated date for trend analysis is early 2028.

(c) PacifiCorp is using its fire incident tracking database to inform lessons learned by capturing specific information related to fire incidents including items such as suspected initiating cause, type of equipment involved in the incident, and the protective device settings (Enhanced Safety Settings (ESS) versus non-ESS) for incidents involving protective device operation. This data helps the company to determine the ignition risk drivers that are primarily associated with fire incidents and potential mitigations that can be performed to reduce/mitigate these incidents.