

August 29, 2025

VIA OEIS E-FILING

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Docket # 2026-2028-Base-WMPs

RE: PacifiCorp 2026-2028 Base Wildfire Mitigation Plan

PacifiCorp d/b/a Pacific Power & Light Company (“PacifiCorp”) submits these reply comments in response to comments received from the Green Power Institute (“GPI”) regarding PacifiCorp’s 2026 Wildfire Mitigation Plan (“WMP”) Update.

If you have any questions regarding this request, please contact Pooja Kishore, Regulatory Affairs Manager at (503) 813-7314.

Sincerely,

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Enclosure

**BEFORE THE OFFICE OF ENERGY INFRASTRUCTURE SAFETY
OF THE STATE OF CALIFORNIA**

Office of Energy Infrastructure Safety Natural
Resources Agency

2026-2028-WMPs

**PACIFICORP’S REPLY COMMENTS
REGARDING PACIFICORP’S 2026 WILDFIRE MITIGATION PLAN UPDATE**

PacifiCorp, d.b.a. Pacific Power (“PacifiCorp”) submits these reply comments in response to comments received from the Green Power Institute (“GPI”) regarding PacifiCorp’s 2026 Wildfire Mitigation Plan Update.

I. Introduction

PacifiCorp appreciates an opportunity to respond to the comments provided by GPI on its 2026-2028 Base Wildfire Mitigation Plan (“WMP”). In reply, PacifiCorp aims to give additional context for PacifiCorp’s 2026 Wildfire Mitigation Plan Update relevant to the specific issues raised by GPI.

In responding to GPI, PacifiCorp will provide additional clarification for key issues GPI raised. PacifiCorp looks forward to ongoing engagement with GPI and the California Office of Energy Infrastructure Safety (“Energy Safety”) on the evaluation of its WMP. Due to limited time for responding to comments, PacifiCorp may provide additional supplemental comments at a later date.

PacifiCorp disagrees with the recommendation by GPI to reject the 2026-2028 WMP and requests GPI review the referenced sections found in the WMP to address their concerns raised. If

additional clarity is needed PacifiCorp requests that GPI utilize the data request process to resolve their concerns.

II. Risk Assessment, Methodology, and Wildfire Mitigation Strategy

Many of GPI's comments¹ were related to PacifiCorp risk model maturity and the application of the risk assessment to selection of mitigation to support risk reduction for wildfire and outage risk² as defined by Energy Safety. PacifiCorp agrees that the evolution of its risk models, including the integration of Public Safety Power Shutoff ("PSPS") and Protective Equipment and Device Settings ("PEDS") risk is important to provide a comprehensive view of risk to inform what strategies will mitigate the risk most effectively. The improvements described in Section 5.7³ are intended to progress PacifiCorp's model maturity to provide that comprehensive view of risk.

As PacifiCorp matures its risk modeling, it is also working on improvements to support mitigation selection and portfolio optimization as the risk modeling matures. These are also discussed in Section 5.7 of the WMP, which lists several improvements to risk assessment. Specifically, these include portfolio optimization and grid hardening recommendations, monetization of risk events for application in mitigation alternatives analysis, and dynamic grid hardening efficacy rates.

The timeline below shows the risk modeling and wildfire mitigation strategy improvements presented in Table 5-6⁴ and described in Section 5.7 of the WMP. Risk modeling initiatives are in the green boxes on the top row, and the wildfire strategy initiatives are in orange on the bottom

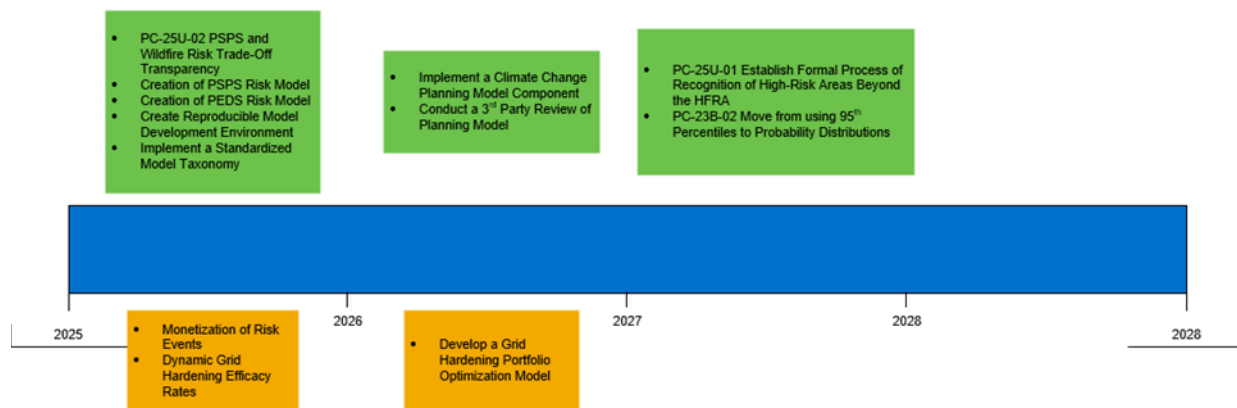
¹ Morris Gergory, Zoe Harrold. Comments of The Green Power Institute on the PacifiCorp 2026-2028 Base Wildfire Mitigation Plan. August 22, 2025. Pages 3-6, 7-12, 13-17.

² Office of Energy Infrastructure Safety. Wildfire Mitigation Plan Guidelines. February 2025. Pages 31-32.

³ PacifiCorp. 2026-2028 base Wildfire Mitigation Plan Revision 0. Filed July 11, 2025. Pages 109-119.

⁴ Ibid. Pages 109-111.

row. As shown on this timeline PacifiCorp is making steady progress on risk modeling and wildfire strategy.



III. Risk Methodology and Assessment

Below PacifiCorp provides clarifications on where GPI’s other comments regarding risk assessment are addressed in the WMP:

- **Improve Outage Driver Tracking:** As PacifiCorp discusses in section 8.4⁵ of the WMP, a number of key implementations for outage driver tracking and ignition investigation and correlation have been enhanced with a new database, processes, and dedicated staffing.
- **Consistency and Precision of Risk Modeling Terminology and Definitions:** In section 5.2 of the WMP⁶, PacifiCorp specifically addresses the wildfire likelihood of risk event (“LoRE”) and consequence of risk event (“CoRE”) risk analysis framework. The Wind and Terrain risk scores utilize Technosylva’s FireSight model’s Expected Risk scores as the basis for both calculations. FireSight’s Expected Risk scores are the result of the probability of failure (“POF”) multiplied by the probability of ignition (POI) multiplied by

⁵ Ibid. Pages 214-217.

⁶ Ibid. Pages 53-54.

Wildfire Consequence. This is the same definition of risk that is used by Energy Safety.⁷

GPI states that PacifiCorp refers to Burn Likelihood as probability of ignition. PacifiCorp acknowledges the distinction of these two terms as outlined by GPI; however, uses the term probability of ignition as it relates to the FireSight model. The FireSight model uses the term probability of ignition to note the environmental conditions that could cause an ignition to grow into a wildfire. The probability of ignition is multiplied by the probability of failure to obtain the wildfire LoRE. Thus, Technosylva's POF x POI can be clarified as the POF x Burn Probability in order to align more appropriately with Energy Safety definitions.

- Wind and Terrain / Fuel Driven Fire Consequence Quantification: PacifiCorp's risk modeling is continually maturing, and for these two variables the Company is incorporating substantive changes that will directly address GPI's feedback and result in incremental improvements to PacifiCorp's risk and planning model as described in Section 5.7 of the WMP⁸ and above in the Risk Assessment and Methodology and Wildfire Mitigation Strategy section.

IV. Grid design, Operations, and Maintenance

In its comments, GPI states that PacifiCorp should be ordered to set targets for all its pilots using the examples AI-08, AI-09, and AI-10.⁹ PacifiCorp's TBD target status for those pilots is in reference to the current status of validating and then operationalizing the pilots into a program, at that point targets will be set. Additionally, GPI asserts that "PacifiCorp's Grid Design, Operation, and Maintenance as well as Vegetation Management plans are generally lacking traceable plan

⁷ Office of Energy Infrastructure Safety. Wildfire Mitigation Plan Guidelines. February 2025. Pages 31-33.

⁸ PacifiCorp. 2026-2028 base Wildfire Mitigation Plan Revision 0. Filed July 11, 2025. Pages 109-119.

⁹ Morris, Harrold, Morris Gergory, Zoe Harrold. Comments Of The Green Power Institute on the PacifiCorp 2026-2028 Base Wildfire Mitigation Plan. Page 19.

elements, including targets, percent of work in HFTD/HFRA, timelines, and milestones.¹⁰ Generally, the initiatives in Tables 8-1, 8-2, 8-4, 9-2 and 9-6¹¹ have targets and the percent of work in the High Fire Threat District (“HFTD”) and High Fire Risk Area (“HFRA”) is quantified. Work that is reactive in nature, such as AI-09 Transmission Drone Inspections, AI-10 Distribution Drone Inspections, and GH-15 Pole Wraps do not have targets or an estimate of percent of work in the HFTD and HFRA.

V. Vegetation Management and Inspections

PacifiCorp considers and is continually evaluating and mitigating the risks and hazards of fuel loading adjacent to energy infrastructure and the potential impacts that it may have. GPI indicates in its comments that vegetation management work may result in fuel accumulation and therefore potentially increasing burn probability along right of ways.¹² PacifiCorp is planning on benchmarking debris management practices with other utilities to better learn how they conduct and track debris management, as indicated in the WMP in Table 9-1¹³ and described in Section 9.5.4.¹⁴ PacifiCorp holds regular meetings with other utilities to discuss vegetation management and intends to utilize this opportunity to discuss partnerships and their practices for purposes of mutually beneficial preparedness and outcomes.

PacifiCorp provides relevant information from its WMP that was not referenced in GPI’s comments regarding its plan to enhance its vegetation management tracking and prioritization system in a manner that is consistent with regulatory guidelines. PacifiCorp’s relevant WMP targets include adopting new enterprise software for enhanced tracking, prioritization, and

¹⁰ Ibid. Page 19.

¹¹ PacifiCorp. 2026-2028 Base Wildfire mitigation Plan Revision 0. Filed July 11, 2025. Pages 164, 188, 220, 266-267, 309-310.

¹² Morris, Harrold, Morris Gergory, Zoe Harrold. Comments Of The Green Power Institute on the PacifiCorp 2026-2028 Base Wildfire Mitigation Plan. Page 24.

¹³ PacifiCorp. 2026-2028 Base Wildfire Mitigation Plan Revision 0. July 11, 2025. Page 264.

¹⁴ Ibid. Page 294.

scheduling of vegetation management work in 2026, followed by operationalizing data-driven vegetation management accordingly in 2027.¹⁵ GPI states that it believes PacifiCorp must have the capability to track and report on the number of past due Vegetation Management work orders as a function of risk based on location and priority.¹⁶ At the time of filing the WMP, PacifiCorp had not yet designed the MDMS to assign work order units and prioritization. Since the filing, PacifiCorp has progressed on a design and is actively working on incorporating prioritization at the work unit level while including past due reporting into that system.

VI. Conclusion

PacifiCorp appreciates this opportunity to provide these reply comments regarding the Wildfire Mitigation Plan Update for 2026. PacifiCorp respectfully requests that Energy Safety approve PacifiCorp's 2026 Wildfire Mitigation Plan Update.

Respectfully submitted,

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August 29, 2025

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¹⁵ PacifiCorp. 2026-2028 Base Wildfire Mitigation Plan Revision 0. July 11, 2025. Pages 315, 426, 519-520.

¹⁶ Ibid. Page 436.