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September 18, 2025

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Re: CA 2025-WMPs
OEIS-P-WMP_2025-PC-10

Please find enclosed PacifiCorp's Responses to OEIS Data Requests 10.1-10.3. Also provided is Attachment OEIS 10.1.

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

Sincerely,

_____/s/_____
Pooja Kishore
Manager, Regulation

OEIS Data Request 10.1

Regarding Enterprise Systems Assets Identification – On page 439 of PacifiCorp’s 2026-2028 Base WMP, it states that it performs a “periodic audit on the most crucial wires and substation data”.

- (a) Describe the “periodic audit”. What does the audit entail?
- (b) Define “periodic”. Is this periodic audit performed on a pre-determined schedule?
 - i. If yes, define the schedule and specify for what “crucial wires and substation data”.
 - ii. If not, describe what triggers a periodic audit to be performed?
- (c) How many “periodic audits” were performed in:
 - i. 2023.
 - ii. 2024.
 - iii. 2025 (to-date).
- (d) Provide the most recently completed “periodic audit”.

Response to OEIS Data Request 10.1

- (a) As explained in the Company’s response to OEIS Data Request 9.5, data from the Geospatial Information System (GIS) is compared with data from SAP and Maximo. PacifiCorp’s subject matter experts (SMEs) perform this analysis. If data is found to be in one system and not the other, a corresponding record will be added to ensure the systems match. For example, if a record of a recloser is found in GIS but not in SAP, a corresponding record will be added to SAP to ensure the systems match. The data sets are compared to ensure asset records match between the systems. If data gaps are found, the GIS and SAP/Maximo teams will align on what needs to be changed. Records will be added, changed or removed by the appropriate team. For example, a change to GIS would be performed by a member of the GIS team. Since these are internal reviews, completion of audits is typically documented through an email sent between PacifiCorp employees.
- (b) No, it is not on a pre-determined schedule. The periodicity of data audits depends on the criticality of data being a 100 percent match between GIS and SAP or GIS and Maximo. Audits are a manual process and require significant effort from experienced SMEs. Some audits are scheduled, but some are performed on an ad-hoc basis and could have differing business objectives.

Critical substation data: The only critical substation data shared between GIS and Maximo is substation location data. There is no scheduled periodic audit for this data. Audits on this data are considered ad-hoc.

- i. Critical wires data: PacifiCorp uses GIS and SAP to track transmission lines, distribution circuits, distribution capacitor banks, communicating and non-communicating faulted circuit indicators, fuse savers, reclosers, regulators, transmission switches, distribution transfer switches, trip savers, underground vaults and weather stations. PacifiCorp schedules an annual audit of recloser records between GIS and SAP. Other wires assets are periodically audited on an ad-hoc basis.
 - ii. For asset classes without a scheduled periodic audit, a business requirement, professional judgement of subject matter experts or other new information would trigger an audit. For example, if the field reported an observed asset in the field that was not present in GIS or SAP, that would trigger an audit.
- (c) Please refer to the Company's responses to subparts i. through iii. below:
- i. There is not any formal record of a periodic audit in 2023.
 - ii. In 2024, PacifiCorp began an annual periodic audit of recloser data between GIS and SAP. The analysis was completed in Q1 2025.
 - iii. The following audits are in progress:
 - Annual recloser audit.
 - Faulted circuit indicators (communicating and non-communicating). This audit is extensive and may continue into 2026.
 - Substation location physical address audit.
- (d) Please refer to Attachment OEIS 10.1 which provides a copy of the email stating the completion. The recloser asset records matched 100 percent between GIS and SAP, therefore, there is no file showing the data gaps (records missing in one system or another) included in the email.

OEIS Data Request 10.2

Regarding Identifying 100 Percent Asset Identification – The WMP Guidelines require that the electrical corporation provide its “process for integrating 100 percent asset identification or its justification if not currently in place.”¹ On page 438 of PacifiCorp’s 2026-2028 Base WMP, it discusses its process for validating “asset information between GIS and SAP and GIS and Maximo”.

Provide the percentage of total assets PacifiCorp has stored in:

- i. GIS (i.e., number of “wires assets” stored in PacifiCorp’s GIS system divided by total number of wires assets).
 1. If PacifiCorp is not aware of its total number of wires assets throughout its California service territory, indicate what percentage of wires assets it believes it is aware of.
- ii. SAP (i.e., number of “wires asset” used for planning of asset inspections stored in SAP divided by total number of wires asset).
 1. If PacifiCorp is not aware of its total number of wires asset throughout its California service territory, indicate what percentage of wires assets it believes it is aware of.
- iii. Maximo (i.e., number of assets for “substation equipment” stored in Maximo divided by total number of assets for substation equipment).
 1. If PacifiCorp is not aware of its total number of substation equipment throughout its California service territory, indicate what percentage of substation equipment it believes it is aware of.
- iv. Total number of assets (and percentage of total) not stored in either SAP, GIS, or Maximo.

Response to OEIS Data Request 10.2

- i. PacifiCorp has a process that aims to have 100 percent of wires asset records stored in GIS. Consistent with this process, all identified wires assets are stored in GIS.
 1. Not applicable. Please refer to the Company’s response to subpart i. above.

¹ Office of Energy Infrastructure Safety, [Wildfire Mitigation Plan Guidelines](https://efiling.energy.ca.gov/eFiling/Getfile.aspx?fileid=58026&shareable=true), Published February 24, 2025, URL:(<https://efiling.energy.ca.gov/eFiling/Getfile.aspx?fileid=58026&shareable=true>)

- ii. PacifiCorp has a process that aims to have 100 percent of wires asset records required for asset inspection planning stored in SAP. Consistent with this process, all identified wires assets are stored in SAP.
 - 1. Not applicable. Please refer to the Company's response to ii. above.
- iii. PacifiCorp has a process that aims to have 100 percent of substation assets stored in Maximo. Consistent with this process, all identified substation equipment assets are stored in Maximo.
 - 1. Not applicable. Please refer to the Company's response to (iii) above.
- iv. Not applicable. Please refer to the Company's responses to subparts (i) through (iii) above.

OEIS Data Request 10.3

Regarding Climate Vulnerability Assessment – On page 41 of PacifiCorp’s 2026-2028 Base WMP, it states, “PacifiCorp has not performed a climate vulnerability assessment.... PacifiCorp is actively participating in the EPRI Climate READi study and with Argonne National Labs to assess climate change impacts within its service territory.” In Table 10-1, PacifiCorp lists initiative, “Climate Vulnerability Assessment” (SA-05), which has a 2026 qualitative target of “Study underway,” “Study delivered” for 2027, and “N/A” for 2028.

- (a) Describe the project scope for the “EPRI Climate READi study” and how “PacifiCorp is actively participating”.
- (b) Describe the project scope for PacifiCorp’s participation with Argonne National Labs.
- (c) Does PacifiCorp anticipate that the EPRI Climate READi study and its work with Argonne National Labs will lead to its Climate Vulnerability Assessment? Explain.
- (d) Provide all project steps for the Climate Vulnerability Assessment (SA-05) targets, with specific outcomes and timeline for each step, from inception to completion.
- (e) What actions does PacifiCorp anticipate taking because of the “Climate Vulnerability Assessment” study referenced in Table 10-1 once the study is delivered in 2027.
- (f) What information and outputs from the study referenced in Table 10-1 does PacifiCorp anticipate incorporating into its risk modeling efforts?

Response to OEIS Data Request 10.3

- (a) PacifiCorp is engaged in the Electric Power Research Institute’s (EPRI) Climate Resilience and Adaptation Initiative (READi), which aims to develop a standardized Power Framework for executing Company-specific climate resiliency assessments. Along with several other utilities across North America, PacifiCorp actively participated in EPRI climate READi program since February 2023 providing feedback to develop the EPRI Climate READi Power Framework¹. The standardized Power Framework, published in May 2025, provides tools and methodologies for performing Company-specific climate resiliency modeling.
- (b) Following EPRI’s publication of a standardized climate resiliency power framework in May 2025, PacifiCorp is leveraging Argonne National Laboratory’s (ANL) expertise in regional climate modeling and advanced computing to build a high-resolution, dynamically downscaled climate model. This model will enhance understanding of extreme weather impacts across PacifiCorp’s service territory,

- including wildfire severity trends and the projected frequency of events such as extreme temperatures, wind, and ice during the mid-century period (2045–2054).
- (c) The EPRI Climate READi initiative provides a standardized framework and guidelines for conducting company-specific climate resiliency modeling. PacifiCorp is leveraging ANL’s expertise in regional climate modeling and advanced computing to develop a high-resolution, dynamically downscaled climate model. Based on the outcomes of ANL’s study, PacifiCorp will perform an asset vulnerability assessment to withstand extreme events.
 - (d) The targets and timeline are described in Table 10-1 of the 2026-2028 Base Wildfire Mitigation Plan (WMP) and listed below:

2026: Study Underway

2027: Study Delivered
 - (e) PacifiCorp is leveraging ANL’s expertise in regional climate modeling and advanced computing to develop a high-resolution, dynamically downscaled climate model. Based on the outcomes of ANL’s study, PacifiCorp will perform an asset vulnerability assessment to withstand extreme events.
 - (f) As described on page 117 of the 2026-2028 Base WMP, PacifiCorp has an improvement, “Implement a Climate Change Planning Model Component,” and PacifiCorp will evaluate the outcomes of these engagements and adjust its model output appropriately. Until these engagements are completed, and the outcomes are evaluated, PacifiCorp will not speculate on what will be incorporated into risk modeling efforts.