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RE: CA 2025-WMPs
OEIS-P-WMP_2025-PC-11

Please find enclosed PacifiCorp's Responses to OEIS Data Requests 11.1-11.4.

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

Sincerely,

_____/s/_____
Pooja Kishore
Manager, Regulation

OEIS Data Request 11.1

Regarding WMP Expenditure Amounts by Total Territory and HFTD – The Energy Safety Data Guidelines require an electrical corporation to submit 2026-2028 Base WMP Tabular Wildfire Mitigation Data.¹ Within its WMP data submission, the electrical corporation is required to submit “actual and projected costs of initiatives in Wildfire Mitigation Data Table 11” and the electrical corporation must provide those expenditure amounts “broken out by total territory and HFTD.”² In PacifiCorp’s data submission,³ for every mitigation area other than Grid Design, Operations, and Maintenance, PacifiCorp did not break out its expenditure amounts by total territory and HFTD.

- (a) Provide an explanation for each mitigation category shown below, where PacifiCorp did not break out its projected expenditure amounts for by total territory and HFTD, why PacifiCorp did not break out its projected expenditure amount by total territory and HFTD.
 - i. Risk Methodology
 - ii. Wildfire Mitigation Strategy
 - iii. Vegetation Management
 - iv. Situational Awareness
 - v. Emergency Preparedness, Collaboration and Public Awareness
 - vi. Enterprise Systems
- (b) Explain why PacifiCorp was able to provide a breakout of its projected expenditure amount for the Grid Design, Operations, and Maintenance mitigation area by total territory and HFTD.

Response to OEIS Data Request 11.1

- (a) Please refer to the Company’s responses to subparts i. through vi. below:
 - i. Activities regarding risk modeling as described in Section 5 of the 2026-2028 Wildfire Mitigation plan (WMP) are performed for the total territory and do not differentiate between the High Fire Threat District (HFTD) and non-HFTD. PacifiCorp is currently unable to provide auditable and verifiable expenditure amounts broken out by non-HFTD and HFTD due to system limitations.
 - ii. PacifiCorp’s wildfire mitigation strategy work as described in Section 6 of the 2026-2028 WMP is generally performed at the total territory level and does not

¹ Data Guidelines, pages 165-167

² Data Guidelines, pages 165-166. Note: in Table 11’s “HFTD TIER” field, the “Territory” category represents the entire electrical corporation’s service territory, including HFTD. The “HFTD” category represents a *subset of the territory category*.

³ PacifiCorp [PC_2026-WMP_R0](https://efiling.energy.ca.gov/eFiling/Getfile.aspx?fileid=59034&shareable=true), Published July 23, 2025 (URL: <https://efiling.energy.ca.gov/eFiling/Getfile.aspx?fileid=59034&shareable=true>).

differentiate between the HFTD and non-HFTD. While there are activities such as those described in Section 6.1.2 specific to the HFTD, PacifiCorp is currently unable to provide auditable and verifiable expenditure amounts broken out by HFTD and non-HFTD due to system limitations. The systems do not tag expenditures by geographic locations in a way that allows for consistent, validated reporting at the HFTD and non-HFTD level.

- iii. PacifiCorp is currently unable to provide auditable and verifiable expenditure amounts broken out by non-HFTD and HFTD due to system limitations. The systems do not tag expenditures by geographic locations in a way that allows for consistent, validated reporting at the HFTD and non-HFTD level.
 - iv. PacifiCorp Situational Awareness activities that the meteorology team performs described in Section 10 of the 2026-2028 WMP are performed at the total territory level, and do not differentiate between the HFTD and non-HFTD. While there are situational awareness initiatives such as those described in Sections 10.2, 10.3 and 10.4 of the 2026-2028 WMP that address location-specific equipment, PacifiCorp is currently unable to provide auditable and verifiable expenditure amounts broken out by HFTD and non-HFTD due to system limitations. The systems do not tag expenditures by geographic locations in a way that allows for consistent, validated reporting at the HFTD and non-HFTD level.
 - v. PacifiCorp's emergency preparedness, collaboration, and public awareness activities and initiatives as described in Section 11 of the 2026-2028 WMP are performed at the total territory level and do not differentiate between the HFTD and non-HFTD.
 - vi. PacifiCorp's enterprise systems as described in Section 12 of the 2026-2028 WMP operate at the total territory level, the Company does not have enterprise systems that are specific to the HFTD or non-HFTD.
- (b) PacifiCorp provided a breakout of projected expenditure for initiative GH-01: Grid Hardening and System Design because the planned work is within the HFTD.

OEIS Data Request 11.2

Regarding 2026-2028 Base WMP Mitigation Activity in HFTD and Non-HFTD –

For the mitigation categories below, provide, in percentages, the amount of mitigation activity that is planned to occur in the HFTD and Non-HFTD during the 2026-2028 Base WMP period? If PacifiCorp is not aware of the amount of mitigation activity that is planned to occur in the HFTD and Non-HFTD, explain the HFTD/Non-HFTD mitigation activity breakdown PacifiCorp is aware of as of 2025.

- (a) Risk Methodology
- (b) Wildfire Mitigation Strategy
- (c) Grid Design, Operations, and Maintenance
- (d) Vegetation Management
- (e) Situational Awareness
- (f) Emergency Preparedness, Collaboration and Public Awareness
- (g) Enterprise Systems

Response to OEIS Data Request 11.2

- (a) As stated in the Company's response to OEIS Data Request 11.1 subpart (a) i., activities regarding risk modeling as described in Section 5 of the 2026-2028 Wildfire Mitigation plan (WMP) are performed for the total territory and do not differentiate between the high fire threat district (HFTD) and non-HFTD. No analysis has been performed by PacifiCorp for 2025 activity or activity planned to occur during the 2026-2028 Base WMP period to estimate the percentage of mitigation activity that is performed in the HFTD and non-HFTD.
- (b) As stated in the Company's response to OEIS Data Request 11.1 subpart (a) ii., PacifiCorp's wildfire mitigation strategy is generally performed at the total territory level and do not differentiate between the HFTD and non-HFTD. No analysis has been performed by PacifiCorp for 2025 activity or activity planned to occur during the 2026-2028 Base WMP period to estimate the percentage of mitigation activity that is performed in the HFTD and non-HFTD.
- (c) No analysis has been performed by PacifiCorp for 2025 activity or activity planned to occur during the 2026-2028 Base WMP period to estimate the percentage of mitigation activity that is performed in the HFTD and non-HFTD.
- (d) No analysis has been performed by PacifiCorp for 2025 activity or on activity planned to occur during the 2026-2028 Base WMP period to estimate the percentage of mitigation activity that is performed in the HFTD and non-HFTD.

- (e) As stated in the Company's response to OEIS Data Request 11.1 subpart (a) iv., PacifiCorp's situational awareness activities performed by the meteorology department are conducted at the total territory level and does not differentiate between the HFTD and non-HFTD. No analysis has been performed by PacifiCorp for 2025 activity or on activity planned to occur during the 2026-2028 Base WMP period to estimate the percentage of mitigation activity that is performed in the HFTD and non-HFTD.
- (f) As stated in the Company's response to OEIS Data Request 11.1 subpart (a) v., PacifiCorp's emergency preparedness, collaboration and public awareness activities are performed at the total territory level and does not differentiate between HFTD and non-HFTD. No analysis has been performed by PacifiCorp for 2025 activity or on activity planned to occur during the 2026-2028 Base WMP period to estimate the percentage of mitigation activity that is performed in the HFTD and non-HFTD.
- (g) As described in the Company's response to OEIS Data Request 11.1 subpart (a) vi., PacifiCorp's enterprise systems operate at the total territory level, the Company does not have enterprise systems that are specific to the HFTD. No analysis has been performed by PacifiCorp for 2025 activity or on activity planned to occur during the 2026-2028 Base WMP period to estimate the percentage of mitigation activity that is performed in the HFTD and non-HFTD.

OEIS Data Request 11.3

Regarding What is Needed to Enable a Break Down of HFTD and Non-HFTD Expenditures – Explain what PacifiCorp would need (e.g., software, processes, policies) to enable it to break out its WMP expenditure amounts by total territory and HFTD?

- (a) For recorded expenditures (e.g., 2024-2025).
- (b) For projected expenditures.

Response to OEIS Data Request 11.3

- (a) PacifiCorp has not scoped the changes that would be required to break out recorded expenditure into total territory and High Fire Threat District (HFTD). Considerations in scoping would include but are not limited to:

- The level of detail required by regulators such as the California Office of Energy Infrastructure Safety (Energy Safety) and the California Public Utilities Commission (CPUC) for compliance activities.
- Ensuring repeatable and auditable processes
- The number of systems impacted
- Resource impacts
- Policy changes
- Cost and effort

- (b) PacifiCorp has not scoped the policy, process and technology changes that would be required to break out projected expenditure into total territory and HFTD. Considerations in scoping would include but are not limited to:

- The level of detail required by regulators such as Energy Safety and the CPUC for compliance activities.
- Ensuring repeatable and auditable processes.
- The number of systems impacted
- Resource impacts
- Policy changes
- Cost and effort

OEIS Data Request 11.4

Regarding PacifiCorp Plans to Track HFTD and Non-HFTD WMP Expenditures –

- (a) What plans, if any, does PacifiCorp have to enable it to record and project which WMP expenditures are in the HFTD and which are in the Non-HFTD?
- (b) If a plan exists, provide all milestones, descriptions of each step, target implementation dates to implement its plan to enable it to track which WMP expenditures are in the HFTD and Non-HFTD, and a copy of the plan.
- (c) If a concept of a plan exists, describe the current state of the conceptual plan with all milestones, descriptions of each step, and target implementation dates to implement its plan to enable it to track which WMP expenditures are in the HFTD and Non-HFTD.

Response to OEIS Data Request 11.4

- a. PacifiCorp does not have plans at this time to implement changes to enable the Company to record and project which wildfire mitigation plan (WMP) expenditures are in the High Fire Threat District (HFTD) and which are in the Non-HFTD.
- b. PacifiCorp does not have plans at this time to implement changes to enable the Company to record and project which WMP expenditures are in the HFTD and Non-HFTD.
- c. PacifiCorp does not have a conceptual plan to implement changes to enable the Company to record and project which WMP expenditures are in the HFTD and Non-HFTD.