



October 27, 2025

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NOTICE OF NON-PERFORMANCE

Ms. Carrie Laird:

Pursuant to Government Code section 15472, et seq, the Office of Energy Infrastructure Safety (Energy Safety) has conducted an inspection of work completed by PacifiCorp in accordance with its 2025 Wildfire Mitigation Plan (WMP) and determined the existence of non-performance with its approved WMP requiring correction. Energy Safety therefore issues PacifiCorp a Notice of Non-Performance (NON).

On September 10, 2025, Energy Safety conducted an inspection of PacifiCorp's WMP initiatives in the vicinity of the city of Hornbrook, California. The inspection report is enclosed herewith. Energy Safety found the following deficiency:

Deficiency 1. Energy Safety observed that in implementing 2025 WMP initiative 8.2.3.2 Clearance, PacifiCorp failed to adhere to its protocol of achieving vegetation clearance for distribution lines along the conductor near Pole ID 06247006-211003, Vegetation Management ID DN_Insp_2025_5G19 at coordinates 41.906507, -122.547518. Energy Safety considers this non-performance to be in the Moderate risk category. PacifiCorp must complete a corrective action for this non-performance by 6 months from date of this notice.¹

Within 30 days from the issuance date of this NON, PacifiCorp must provide a response advising Energy Safety of corrective actions taken or planned to remedy the identified deficiency.

This response shall be filed in the Energy Safety e-Filing system under the 2025 NON Docket² and the associated file name(s) must begin with the NON identification number.

Prior to its response, PacifiCorp may request an informal conference with Energy Safety for the purpose of disputing any issues raised in this NON no later than five (5) business days before the response deadline.³ Requests for informal conference with Energy Safety must be e-mailed to

¹ Gov. Code section 15475.2(a)(2)

² <https://efiling.energysafety.ca.gov/EFiling/DocketInformation.aspx?docketnumber=2025%20NON>

³ Energy Safety Compliance Guidelines, p. 4

environmentalscience@energysafety.ca.gov, with a copy sent to Max Zazzeron, Max.Zazzeron@energysafety.ca.gov, and Elizabeth McAlpine, Elizabeth.McAlpine@energysafety.ca.gov.

Sincerely,



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INSPECTION REPORT

Overview

The Office of Energy Infrastructure Safety (Energy Safety) conducts field inspections to verify the work performed by an electrical corporation as reported in an approved Wildfire Mitigation Plan (WMP), and to assess general conditions of electrical infrastructure that may adversely impact an electrical corporation's wildfire risk. A Notice of Non-Performance (NON) is issued for any instances of non-performance identified during an inspection related to an electrical corporation's execution of its WMP initiatives.

Energy Safety has designated this finding of deficiency as "Moderate" risk. PacifiCorp must correct the deficiency pursuant to the timeline provided in Table 1.⁴

Table 1. Risk Category and Correction Timelines

Risk Category	Deficiency correction timeline
Severe	• Immediate resolution
Moderate	• 2 months (in High Fire Threat District (HFTD) Tier 3) • 6 months (in HFTD Tier 2) • 6 months (if relevant to worker safety; not in HFTD Tiers 2 or 3)
Minor	• 12 months or resolution scheduled in WMP update

⁴ Energy Safety Compliance Guidelines, p. 3



Inspection Summary

Energy Safety found a “Moderate” Adherence to Protocol deficiency at VMP ID DN_Insp_2025_5G19 near pole 06247006-211003 in HFTD Tier 2. PacifiCorp did not perform its Clearance program (WMP Initiative number 8.2.3.2) as required in the WMP, instead a tree was within the minimum clearance distance along the conductor.

The inspection location and WMP initiative summary are included in Table 2.

Table 2: Inspection Location and Initiative Summary

Electrical Corporation:	PacifiCorp
Report Number:	NON_ESD_PC_MAZ_20250910_0906
Inspector:	Max Zazzeron
WMP Year Inspected:	2025
Quarterly Data Report (QDR) Referenced:	Quarter Q2
Inspection Selection:	Energy Safety inspected the locations based on PacifiCorp’s Q2 QDR.
Relevant WMP Initiative:	2025 WMP 8.2.3.2 Distribution Clearance program (VM-06)
Date of inspection:	September 10, 2025
City and/or County of Inspection:	City of Hornbrook, Siskiyou County, California

Inspection Findings

Deficiency 1

Relevant Requirement:

PacifiCorp's WMP states the following regarding initiative number 8.2.3.2 Clearance: "PacifiCorp has adopted expanded post-work minimum clearance distances of at least 12 feet for all distribution lines and has increased post-work clearance distances to 30 feet for transmission lines greater than or equal to 115 kV but less than 230 kV. PacifiCorp also prunes vegetation beyond minimum required clearances in multiple ways as presented in the Vegetation SOP. First, PacifiCorp uses increased clearance distances on distribution lines for certain species of trees, depending on tree growth rate. PacifiCorp separates vegetation into three categories: (a) slow growing; (b) moderate growing; and (c) fast growing. In all cases, PacifiCorp applies the 12-foot minimum post-work clearance for slow-growing species. In certain cases, PacifiCorp applies an increased clearance for moderate growing and fast-growing species."⁵

Additionally, PacifiCorp's Vegetation Standard Operating Procedure states that the post-work clearance distance for "Fast-Growing" tree species under conductors should be minimum 16 feet at the time that the work is performed.⁶

PacifiCorp's WMP states the following regarding initiative number 8.2.2.1 Detailed Inspections and Management Practices for Vegetation Clearances around Distribution Electrical Lines and Equipment: "Detailed inspections for vegetation clearances around distribution electric lines in California are generally performed on a planned three-year cycle as part of the routine maintenance program."⁷

Finding:

Energy Safety considers this deficiency as "Moderate" because the identified vegetation is located within 3 feet of the distribution lines and given the relatively fast growth rate of willow trees, it was not trimmed to a sufficient distance at the time of trim as required by PacifiCorp's WMP (12 feet) and Vegetation SOP (16 feet). Additionally, the tree will likely exceed the height of the conductor lines before PacifiCorp's next inspection cycle.

PacifiCorp's Q2 2025 QDR data indicated that PacifiCorp trimmed vegetation along the distribution lines under its Distribution Clearance program (VM-06 WMP Initiative number 8.2.3.2), near GPS coordinates 41.906507, -122.547518, between May 19, 2025 and June 16, 2025. The inspector observed a tree (*Salix* sp.) approximately

⁵ PacifiCorp "2023-2025 Wildfire Mitigation Plan Revision 6," January 17, 2025. P. 220 (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57823&shareable=true> accessed October 14, 2025)

⁶ PacifiCorp "Vegetation Standard Operating Procedure" July 1, 2017 (pacificorp.com/content/dam/pcorp/documents/en/pacificorp/wildfire-mitigation/responses-issued/2017_Vegetation_SOP.pdf accessed October 14, 2025)

⁷ PacifiCorp "2023-2025 Wildfire Mitigation Plan Revision 6," January 17, 2025. P. 210 (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57823&shareable=true> accessed October 14, 2025)

0.4 span northwest of pole ID 06247006-211003, near 14900 Hornbrook Road, Hornbrook, California 96044, growing directly under the conductors with branches within three feet of the conductors.

The inspector measured the height of both the tree and conductors using a Nikon Forestry Pro II laser rangefinder. The tree measured 19 feet tall, and the conductor heights measured 22 feet above the ground, resulting in a clearance of approximately three feet, which is within the "Minimum Clearance Distance" of 12 feet as outlined in the WMP. The inspector's observation is documented in Exhibit A photographs (Deficiency 1), which are attached to this report. Photo numbers 1 - 4 depict the subject tree within three feet of the conductors.

Exhibits

Exhibit A: Photo Log
Structure ID: 06247006-211003
Deficiency 1

	
Photo 1: Pole ID 06247006-211003	Photo 2: View of the tree facing northwest from the pole.



Photo 3: View of the tree branches located within 3 feet of the distribution line. The photo was taken facing northeast from the street.



Photo 4: Secondary view of the tree branches located within 3 feet of the distribution line. The photo was taken facing east from the street.