



November 6, 2025

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VP of Wildfire Mitigation and Emergency Operations

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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 11, 2025, Energy Safety conducted an inspection of PacifiCorp's WMP initiatives in the vicinity of Sims, California. The inspection report is enclosed herewith. Energy Safety found the following deficiency:

Deficiency 1. Energy Safety observed that in implementing 2025 WMP initiative 8.2.3.1.1 Wood and Slash Management, PacifiCorp failed to adhere to its protocol of managing wood and slash near Pole ID 06236005-026002, Vegetation Management ID DN_Insp_2025_5G99 at coordinates 41.003248, -122.407049. Energy Safety considers this non-performance to be in the Minor risk category. PacifiCorp must complete a corrective action for this non-performance by 12 months from date of this notice.

Within 30 days from the issuance date of this NON, the electrical corporation 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 Docket¹ and the associated file name(s) must begin with the NON identification number.

Prior to its response, the electrical corporation 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.² Requests for informal conference with Energy Safety must be e-mailed to

¹ <https://efiling.energysafety.ca.gov/EFiling/DocketInformation.aspx?docketnumber=2025%20NON>

² Energy Safety Compliance Guidelines, p. 4

environmentalscience@energysafety.ca.gov, with a copy sent to Akiko Masuda, Akiko.Masuda@energysafety.ca.gov, and Elizabeth McAlpine, Elizabeth.McAlpine@energysafety.ca.gov.

Sincerely,

A handwritten signature in black ink that reads "Sheryl Bilbrey". The signature is written in a cursive, flowing style.

Sheryl Bilbrey
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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 "Minor" risk. PacifiCorp must correct the deficiency pursuant to the timeline provided in Table 1.³

Table 1. Risk Category and Correction Timelines

Risk Category	Deficiency correction timeline
Severe	<ul style="list-style-type: none">• Immediate resolution
Moderate	<ul style="list-style-type: none">• 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	<ul style="list-style-type: none">• 12 months

³ Energy Safety Compliance Guidelines, p. 3



Inspection Summary

Energy Safety found a “Minor” Adherence to Protocol deficiency at VMP ID DN_Insp_2025_5G99 near pole 06236005-026002 in HFTD Tier 2. PacifiCorp did not perform its Wood and Slash Management (WMP Initiative number 8.2.3.1.1) as required in the WMP and section 2.4.3 Debris Disposal in the Vegetation SOP which is documented in Exhibit B. This resulted in accumulations of wood and slash left onsite. PacifiCorp must complete a corrective action by 12 months from date of this notice.

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_AKM_20250911_1105
Inspector:	Akiko Masuda
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(s):	2025 WMP 8.2.3.1.1 Wood and Slash Management
Date of inspection:	September 11, 2025
City and/or County of Inspection:	City of Sims, Siskiyou County, California

Inspection Findings

Deficiency 1

Relevant Requirements:

PacifiCorp's WMP states the following regarding initiative number 8.2.3.1.1 Wood and Slash Management: "PacifiCorp does not have a separate wood and slash management program or initiative beyond the management practices as identified in its Vegetation SOP."⁴

PacifiCorp's Vegetation SOP states the following regarding section 2.8.2 Rural Areas: "In rural areas, slash should be disposed of on-site whenever possible. For off-road, wooded areas, brush should be lopped into three-foot maximum lengths, and scattered in piles no more than two-feet high. Stems larger than six-inches in diameter should be left on site. Limbs and slash should be piled separately. Limbs and slash should be disposed of at the sides of distribution rights-of-way, and outside the wire zone of transmission rights-of-way, unless specified otherwise by the regional forester. If brush is chipped, it should be broadcast on site wherever possible. Resulting chip piles should be no higher than two-feet. Debris piles should not limit or block access to the right-of-way, or create fire risk."⁵

Findings:

Energy Safety considers this deficiency as "Minor" because the presence of slash creates a potential fuel source for wildfire.

PacifiCorp's Q2 2025 QDR indicated that PacifiCorp trimmed and removed vegetation under its Distribution Clearance program (VM-06 WMP Initiative number 8.2.3.2) at vegetation management point (VMP) ID DN_Insp_2025_5G99. The reported location provided by PacifiCorp indicated that work was completed on April 27, 2025. Near pole ID 06236005-026002 at GPS coordinates 41.003248, - 122.407049, the inspector observed an accumulation of undisposed wood and slash remaining onsite. The inspector's observation is documented in Exhibit A photographs, which are attached to this report (Photos 1 to 5).

⁴ PacifiCorp "2023-2025 Wildfire Mitigation Plan Revision 6," January 17, 2025. P. 218 (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57823&shareable=true> accessed October 14, 2025)

⁵ 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)

On September 18, 2025, Energy Safety issued a data request, OEIS-E-INP_2025-PC-001, to confirm slash was from PacifiCorp's activities. In its response, PacifiCorp confirmed that wood and slash was associated with a line rebuild construction project and was not part of the PacifiCorp's vegetation management program reported in the QDR.

Although the wood and slash did not result from work performed pursuant to Distribution Clearance program's (VM-06 WMP Initiative number 8.2.3.2) vegetation management, the conditions created by the line rebuild construction work create the same fire hazard that PacifiCorp's WMP requires PacifiCorp to mitigate when trimming vegetation. For that reason, Energy Safety finds that leaving the slash in this condition is a failure to perform the work required by the WMP. According to PacifiCorp's Vegetation Management SOP, debris in rural off-road areas must be lopped into lengths no greater than three feet, scattered in piles no more than two feet high, and only stems larger than six inches in diameter should be left on site. The slash pile exceeds these specifications and includes smaller stems, indicating the non-performance with PacifiCorp's WMP and Vegetation SOP.

Exhibits

Exhibit A: Photo Log

Structure ID: 06236005-026002

Deficiency 1

 A photograph of a metal utility pole in a wooded area. The pole has a yellow label with the ID '06236005-026002' and some handwritten text. The background shows trees and a hillside.	 A photograph showing a large pile of cut branches and wood debris on the ground in a wooded area.
<p>Photo 1: Pole ID 06236005-026002</p>	<p>Photo 2: Closer view of the wood and slash piled and left onsite. The photo was taken facing west from the pole.</p>
 A photograph showing a pile of cut branches and wood debris on the ground in a wooded area, similar to Photo 2.	 A photograph showing a pile of cut branches and wood debris on the ground in a wooded area, similar to Photo 2.


<p>Photo 3: View of wood and slash piles left on site near the pole. The photo was taken facing northwest from the pole.</p>	<p>Photo 4: Closer view of the wood and slash piled and left onsite near the pole. The photo was taken north of the pole.</p>
	
<p>Photo 5: Closer view of the wood and slash piled and left onsite near the pole. The photo was taken south of the pole.</p>	

Exhibit B: PacifiCorp Standard Operation Procedures June 1, 2027

CA R.18-10-007 Wildfire Mitigation
CPUC 4

Attachment CPUC 4-1



Transmission & Distribution Vegetation Management Program

Standard Operating Procedures



identify and correct every potentially hazardous tree. Nevertheless, PacifiCorp has a responsibility to maintain its system by making a reasonable effort to identify trees that are clearly hazardous, and correct the problems they could cause in a timely manner.

- Trees that will take no more than twice the time to remove than to prune during distribution cycle work. High risk trees are not limited by this constraint.
- Trees that take no more time to remove than to prune during interim and ticket work. High risk trees are not limited by this constraint.
- Readily climbable trees.
- Trees with tree houses not meeting the clearance to transmission or distribution conductors shown in (Table 2.2)
- Fast-growing trees that, through growth could interfere with distribution conductors or violate specific state regulatory clearances before the next scheduled maintenance work (cycle-busters).
- Volunteer trees less than six-inches in diameter (DBH), which, through growth, could eventually interfere with distribution conductors.

2.6.1 Equipment Mowing

Mowing is often more cost effective than manual methods of tree removal and should be pursued wherever practical (Figure 2.4). Mowing should be limited to fifteen feet either side of distribution primary wires within transmission rights-of-way and along access roads serving Company facilities

2.7 Mechanical and Helicopter Cutters

Mechanical and helicopter cutters can improve productivity in rural, densely vegetated areas (Figure 2.5). Mechanical cutting shall comply with ANSI A300 (Part 1) section 9.3.2. It should be limited to rural or remote locations and cuts should be made close to the main stem, outside of the branch bark ridge and branch collar. Precautions should be taken to avoid stripping or tearing of bark or excessive wounding.

In subsequent cycles, mechanical work should be monitored and repaired if need be to prevent high risk conditions from developing.

2.8 Slash Disposal

Slash is brush and limbs less than six-inches in diameter removed during tree operations.

2.8.1 Developed Areas

In developed areas, slash should be chipped and removed from the site unless an agreement has been reached with the property owner to leave it. Slash may be left temporarily, provided the crew has notified the property owner or tenant, and arrangements made to clean it up to the customer's reasonable satisfaction within two business days. Tree stems greater than six-inches in diameter should be left on site. Work locations shall left in a safe and orderly condition.

2.8.2 Rural Areas

In rural areas, slash should be disposed of on-site whenever possible. For off-road, wooded areas, brush should be lopped into three-foot maximum lengths, and scattered in piles no more than two-feet high. Stems larger than six-inches in diameter should be left on site.

Limbs and slash should be piled separately. Limbs and slash should be disposed of at the sides of distribution rights-of-way, and outside the wire zone of transmission rights-of-way, unless specified otherwise by the regional forester. If brush is chipped, it should be broadcast on site wherever possible. Resulting chip piles should be no higher than two-feet. Debris piles should not limit or block access to the right-of-way, or create fire risk.

2.9 Emergency Response

Tree work will be required from time to time on emergency storm restoration.

Crews shall be properly equipped to perform the work. PacifiCorp will be the sole determiner of equipment appropriateness. Travel and lodging during the storm is billable. Double occupancy is expected for crew members.

Contractor should provide a designated contact person for each region. Requests for crews should be routed through that contact. Contractor shall be responsible for dispatching crews whenever emergency restoration services are needed.

Crew rosters shall be provided by the contractor and maintained during restoration efforts. At a minimum, rosters shall include: crew member names and position, location, contact information, equipment and identification number.

Debris from storm work is left on site and not chipped or cleaned up, so chippers should not be taken into the field during restoration work. Notification is not required during emergency restoration work, but crews should conduct themselves respectfully.

Emergency work shall be reported on a *Weekly Vegetation Report* according to section 4.2.1.

Emergency work is done under the authority of the district operations managers in cooperation with Company foresters. Tree crews and contract utility foresters assigned to storms should work under the direction of circuit captains assigned by operations. Tree crews should report their progress at least daily to both the circuit captain and their GF/supervisor. The supervisor should report crew progress to the appropriate forester.