

**BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF CALIFORNIA**

Order Instituting Rulemaking to Implement Electric  
Utility Wildfire Mitigation Plans Pursuant to Senate  
Bill 901 (2018).

Rulemaking 18-10-007  
(Filed October 25, 2018)

**PACIFICORP'S (U 901 E) RESPONSE TO ADMINISTRATIVE LAW JUDGE'S  
SECOND RULING SEEKING ADDITIONAL INFORMATION ON WILDFIRE  
MITIGATION PLANS**

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March 8, 2019

*Attorney for PacifiCorp*

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Order Instituting Rulemaking to Implement Electric  
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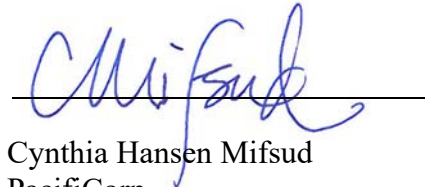
Rulemaking 18-10-007  
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SECOND RULING SEEKING ADDITIONAL INFORMATION ON WILDFIRE  
MITIGATION PLANS**

In accordance with the March 5, 2019 Administrative Law Judge's Second Ruling Seeking Additional Information on Wildfire Mitigation Plans (Ruling), PacifiCorp, d.b.a. Pacific Power ("PacifiCorp"), submits its response to the applicable questions in the Ruling.

Dated: March 8, 2019

Respectfully submitted,



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### **ALJ-SRT Set 2 Data Request 1**

What factors does the filer intend to measure and/or track in order to establish a causal effect between a specific mitigation measure and an anticipated/intended outcome (*e.g.*, reduced frequency of ignition or spread of wildfire)? Identify factors regardless of whether the filer refers to them as a metric, an indicator, or any other term.

### **PacifiCorp's Response to ALJ-SRT Set 2 Data Request 1**

PacifiCorp intends to continue to document and track outages per standard company practice consistent with the data used to inform the company's risk assessment in Section III of the company's California Wildfire Mitigation Plan (WMP). The documenting and tracking will include, at a minimum, the date, time, location, duration/impact, and cause of all momentary or sustained outages.

The metrics and effectiveness measurement as proposed in Table 32 on page 80 of the WMP were developed to address the effectiveness of PacifiCorp's WMP as a whole. However, similar concepts can be extrapolated to specific programs. For example, effective implementation of proactive de-energization programs will result in a reduction in outage category events during fire season in the high fire threat districts (HFTD) caused by weather/wind. Additionally, a reduction in outage category events during fire season in the HFTD caused by tree-non preventable would be indicative of successful operational programs, such as enhanced inspections and recloser setting modifications, and asset hardening programs such as installation of spacer cable.

PacifiCorp views this as an iterative process and intends to re-evaluate these metrics and amend as needed over time.

## **ALJ-SRT Set 2 Data Request 2**

Identify all databases or other compilations of data the filer maintains that contain Geographical Information System (GIS) information or other data related to the filer's past, current or proposed wildfire mitigation work, with database names and descriptions.

## **PacifiCorp's Response to ALJ-SRT Set 2 Data Request 2**

The company maintains (or may access) various databases which relate to wildfire mitigation work, some of which contain Geographical Information System (GIS) information, but also which contain other attributes critical for this work.

These include:

- 1) PacifiCorp GIS (which contains line and equipment data recorded with geographic relationships, including latitude and longitude),
- 2) AFPR (Automated Facility Point Record) contains pole setting and retiring records,
- 3) FPI (Facility Point Inspection, which contains pole data, inspection dates, conditions recorded for inspections and correction dates for conditions identified),
- 4) GISMO (An aggregated database supporting the planning and management of inspection and condition correction work)
- 5) Prosper (the company's outage database) records all outages with relevant devices involved in the outage and its geographic location associated,
- 6) SAP, which records equipment installed, property accounting data and pertinent maintenance plans,
- 7) CalFIRE fire perimeter data which is contained at [http://frap.fire.ca.gov/data/frapgisdata-sw-fireperimeters\\_download](http://frap.fire.ca.gov/data/frapgisdata-sw-fireperimeters_download), and
- 8) Weather data which is collected, analyzed and maintained by NOAA (National Oceanic and Atmospheric Administration) at <https://www.ncdc.noaa.gov/> as well as information collected through RAWS (Remote Automated Weather Stations) in support of the National Interagency Fire Center at <https://raws.dri.edu/>.

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ALJ-SRT Set 2 - 3

### **ALJ-SRT Set 2 Data Request 3**

Discuss the communication methods by which customers will be informed that they have specific emergency customer protection entitlements under Rulemaking 18-03-011.

### **PacifiCorp's Response to ALJ-SRT Set 2 Data Request 3**

When a natural disaster occurs, the company compiles a list of customers who have been directly impacted as part of a post-incident assessment. Customers with structural damage will be contacted by phone, the billing suspended, and new contact information will be updated to their accounts for any future communication. Customers who are experiencing financial hardships due to the natural disaster will be notified of applicable consumer protections when contacting the company for services or when contacting Pacific Power's community based partners. The company's website dedicated to wildfire safety will also include a list of consumer protections in the event of a disaster.

**ALJ-SRT Set 2 Data Request 9**

For each proposed metric (Table 32 in Section VI.B), explain which specific mitigation measures included in the WMP will affect that respective metric and indicator.

**PacifiCorp’s Response to ALJ-SRT Set 2 Data Request 9**

The metrics, indicators, and effectiveness measurement as proposed in Table 32 on page 80 were developed to address the effectiveness of PacifiCorp’s Wildfire Mitigation Plan (WMP) as a whole and mitigate the risks identified in Tables 4 and 5 on pages 25 and 28, respectively. Therefore, all mitigation programs have the potential to influence the metrics. See table below.

Document Reference	Data Source	Specific Metric	Indicator	Measure of Effectiveness	WMP Mitigation Measure
Section III.D.1- Fire History	Cal Fire Perimeter Data Set	Power Line Fires in PacifiCorp’s Service Territory	Sum of Acres Affected	No material increase	All programs
Section III.D.1- Fire History	PacifiCorp outage database	Events recorded with fire reference	Count of events	Reduction in general trend of events	All programs
Section III.D.1- Fire History	PacifiCorp outage database	Events recorded with fire reference: damage fire, equipment fire, pole fire	Count of events	Reduction in general trend of events	All programs
Section III.D.2– Fire Risk Assessment	PacifiCorp outage database	Potential ignition sources	Count of events	Reduction in general trend of events	All programs

However, program-specific effectiveness can be measured by a reduction in outages associated with one, or a combination of several of the outage categories included in table 6 on page 28 of PacifiCorp’s California WMP. That said, no single program is likely to be a single direct measurement of a given program’s effectiveness.

For example, the effectiveness of the company’s Public Safety Power Shut-Off programs should be evident through a reduction in general trend of outages experienced during fire season in high fire threat districts (HFTD) due to weather or wind. Similarly, the effectiveness of the enhanced wildlife asset hardening programs should be evidenced by a reduction in general trend of outages experienced during fire season in HFTD due to animals.

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In contract, measuring the effectiveness of PacifiCorp's proposed asset hardening programs will present challenges as these programs address multiple outage categories such as "Not-Classifiable," "Non-Utility Cause," and "Tree-non-preventable." A reduction in the general trend of outages caused by any or a combination of all three categories will indicate the effectiveness of PacifiCorp's proposed asset hardening programs.

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**ALJ-SRT Set 2 Data Request 10**

What other factors does PacifiCorp intend to measure and/or track in order to establish a causal effect between a specific mitigation measure and an anticipated/intended outcome (*e.g.*, reduced frequency of outages).

**PacifiCorp's Response to ALJ-SRT Set 2 Data Request 10**

See PacifiCorp's Response to ALJ-SRT Set 2 Data Request 1. PacifiCorp intends to re-evaluate these metrics on an iterative basis and amend them as applicable over time.



## **ALJ-SRT Set 2 Data Request 11**

For each Proactive De-Energization Zone designated in PacifiCorp's WMP, confirm whether and how such activity will affect critical first responders and health and community infrastructure. For each such impact, identify or describe how PacifiCorp proposes to mitigate the impact.

### **PacifiCorp's Response to ALJ-SRT Set 2 Data Request 11**

The company recognizes that the proactive de-energization process will substantially impact the affected communities. For this reason, PacifiCorp has taken a more surgical, segmented approach to its proactive de-energization plan, minimizing the number of customers affected during a public safety power shutoff (PSPS) event. In addition, the company has processes in place to prioritize restoration of power to priority customers, such as critical first responders and health and community infrastructure, and is coordinating with the applicable telecommunications providers.

Specifically, the company sectioned the Tier 3 area around Mt. Shasta into several Proactive De-Energization Zones (PDZs) based on electrical connectivity, anticipating that generally not all areas would be triggered simultaneously—which will be increasingly feasible as the company's weather monitoring capabilities are more fully developed. By separating this Tier 3 area into smaller PDZs, PacifiCorp believes that support for any PDZ experiencing a PSPS event can be leveraged from the larger surrounding area, i.e., the neighboring PDZs.

For each of the PDZs, the company identified priority customer accounts. It reviewed each of these accounts with local emergency response personnel to determine the significance of the account to the community and to develop processes for staging restoration efforts at the conclusion of a PSPS event.

In addition, the company has engaged with telecommunications providers to clearly communicate its PSPS plan and they are beginning to understand the limitations of their systems when they are without power. As these limitations are more fully detailed, the company will work with these providers to take appropriate action to minimize the consequences to affected communities resulting from the limitations on public and private communications companies' capabilities.

A summary of PacifiCorp's current coordination efforts by community, or PDZ, is provided below.

Happy Camp—21 priority accounts were initially identified. Generally, these customers indicated that they are able to operate for three days off-grid. Based on historic weather patterns, the company does not anticipate having a PSPS event that would last for multiple days. PacifiCorp estimates that approximately 12 crew hours would be required for

patrolling prior to re-energization so would anticipate the impacts to be approximately one day.

Weed—14 priority accounts were initially identified. Generally, these customers indicated that they are able to operate for three days off-grid, with the exception of the emergency services organization's communication system, which is estimated to withstand approximately four hours without power. In order to mitigate this issue, they would need to rely on network services through telecommunications operators. Based on historic weather patterns, the company does not anticipate having a PSPS event that will last for multiple days. PacifiCorp estimates that approximately just under 10 crew hours would be required for patrolling prior to re-energization so would anticipate the impacts to be approximately one day.

Mt Shasta—46 priority accounts were initially identified. Generally, these customers indicated that they are able to operate for three to four days off-grid, with the exception of the emergency services organization's communication system, which is estimated to be able to withstand approximately four hours without power. In order to mitigate this issue they would need to rely on network services through telecommunications operators. Based on historic weather patterns, the company does not anticipate proactive de-energization would last for multiple days. It estimates that approximately 12 crew hours would be required for patrolling prior to re-energization so would anticipate the impacts to be approximately one day.

Dunsmuir—10 priority accounts were initially identified. Generally, these customers indicated that they are able to operate for three to four days off-grid, with the exception of the emergency services organization's communication system, which is estimated to be able to withstand approximately four hours without power. In order to mitigate this issue they would need to rely on network services through telecommunications operators. Based on historic weather patterns, the company does not anticipate proactive de-energization would last for multiple days. It estimates that approximately 12 crew hours would be required for patrolling prior to re-energization so would anticipate the impacts to be approximately one day.

Snowbrush—No priority accounts were initially identified. The company estimates that approximately two crew hours would be required for patrolling prior to re-energization so would anticipate the impacts to be well under one day.

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Rulemaking 18-10-007

**CERTIFICATE OF SERVICE**

I hereby certify that I have this day served a copy of the **PACIFICORP'S (U 901 E) RESPONSE TO ADMINISTRATIVE LAW JUDGE'S SECOND RULING SEEKING ADDITIONAL INFORMATION ON WILDFIRE MITIGATION PLANS** on all known parties to R.18-10-007 by transmitting an e-mail message, or by US Mail if an e-mail address has not been provided, with the document attached to each person named in the official service list.

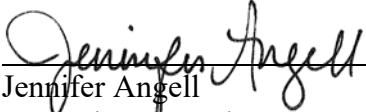
(See the attached Service List R.18-10-007)

A hard copy of the filed documents were also overnighted to the following individuals:

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Executed on **March 8, 2019**, at Portland, Oregon.

  
\_\_\_\_\_  
Jennifer Angell  
Supervisor, Regulatory Operations



California  
Public Utilities  
Commission



[CPUC Home](#)

## CALIFORNIA PUBLIC UTILITIES COMMISSION

### Service Lists

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**LAST CHANGED: MARCH 6, 2019**

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