**Re: WMP - Data Request - Due April 23 2021 - PacifiCorp**

**Request Date: 4/20/21**

**Response Date: 4/23/21**

1. **In Table 11 (Recent use of PSPS and other PSPS metrics), required projections for 2021 and 2022 are blank (Columns N-U). Please complete the table as directed in the Guidelines or provide a compelling explanation justifying why Table 11 is incomplete. If completing the table, please use the attached Excel workbook titled “PC 2021 Table 11 DR TEMPLATE 20210420” by filling in Columns N through U (highlighted in orange).**

Where data existed, PacifiCorp was able to populate the 2015 – 2020 actual datasets requested in Table 11. However, PacifiCorp does not have the data or experience required to calculate predicated values as requested in Table 11 and, therefore, found in challenging to populate. However, to support the request, PacifiCorp has populated forecasted values for 2021 and 2022 using values experienced in 2020 as a best estimate. These values have been populated in columns N through U in Attachment PC 2021 Table 11 DR TEMPLATE 20210420.xlsx.

1. **In Section 7.3.5.13, PC provides no quantitative measures of the quality assurance/quality control (QA/QC) of its VM inspections. Please provide the following:**
2. **The number of audits completed for VM in 2020.**
3. **The number and percentage of total VM inspections that were audited by PC.**
4. **The number and percentage of inspections that failed QA/QC on the first attempt in 2020.**
5. **The number of instances and percent of total instances in 2020 in which an inspection QA/QC process has resulted in a reinspection.**

The following presents audits completed of distribution and transmission lines where scheduled work was completed in its entirety. Pacific Power is defining number of audits completed as number of distribution and transmission lines audited in their entirety.

1. **The number of audits completed for VM in 2020.**

Total number of audits completed in 2020: 65

* + Distribution:
		- Audits of completed work associated with routine maintenance: 17
		- Audits of completed work associated with readiness patrols: 32
	+ Transmission:
		- Audits of completed work associated with readiness patrols: 15
1. **The number and percentage of total VM inspections that were audited by PC.**

Total number of distribution and transmission lines where all scheduled VM work was completed in 2020: 72

* Distribution
	+ Routine Maintenance: 25
	+ Readiness Patrols: 32
* Transmission
	+ Readiness Patrols: 15

Of lines where all VM work scheduled for that line was completed in 2020, 90% were audited.

* PacifiCorp does not specifically/formally audit inspections. PacifiCorp audits vegetation management activity (tree pruning) post completion and issues with the inspection may be noted. During the audit, PacifiCorp identifies exceptions that are attributable to contractor pruning the vegetation and also exceptions that are attributable to the inspection contractor, such as trees that were missed, however PacifiCorp does not formally audit inspections prior to tree work being performed. PacifiCorp audits tree pruning as it is completed to increase likelihood of identifying exceptions while the tree contractor crews are still in the area and may then more efficiently address the exceptions as they are identified. There may be several audit events in order to complete an audit of a distribution or transmission line.
1. **The number and percentage of inspections that failed QA/QC on the first attempt in 2020.**

PacifiCorp currently does not identify inspections that have failed a QA/QC process, but rather identifies exceptions post-tree pruning that are to be addressed by the contractor.

1. **The number of instances and percent of total instances in 2020 in which an inspection QA/QC process has resulted in a reinspection.**

PacifiCorp currently does not formally identify inspections that result in a reinspection. PacifiCorp identifies exceptions post-tree pruning that are to be addressed by the contractor. PacifiCorp also reviews work of inspectors during the course of conducting business to discuss correct trees to list and specifications.

1. **Section 7.3.5.14 states, “PacifiCorp’s general approach to recruiting and training of vegetation management personnel can be found in the company’s Vegetation SOP” (WMP p. 167). The WSD has asked PC to identify where in their VM SOP more information on their recruitment and training can be found; the pages provided (pp. 2-3) briefly discuss “Professionalism” and “Contract utility forester qualifications”.**
	1. **Explain in full and complete detail how PC dictates and influences the qualifications of and the training of contracted VM personnel.**
	2. **Does PC include qualification and training requirements as part of VM contractor Request for Proposals (RFP)? If so, provide an example RFP outlining PC’s required qualifications and training of contracted VM personnel.**
	3. **Does PC require VM personnel (contracted and internal) to attend and pass initial, onboarding trainings focused on:**
		1. **PC’s VM SOP.**
		2. **Wildfire risk reduction.**
		3. **List any additional trainings VM personnel are required to attend and pass upon hiring.**
	4. **Does PC require VM personnel (contracted and internal) to attend and pass continuing education, “refresher” training? If so:**
		1. **How often does this “refresher” training occur?**
		2. **What topics are covered?**
	5. **Provide a detailed explanation of how PC and its contractors track and verify VM training (both initial training and continuing, “refresher” education).**
	6. **Explain if and how PC and its contractors track and measure recall and retention of VM training information after initial training is complete.**
	7. **Provide a detailed explanation of how PC and its contractors track, verify, and encourage VM personnel to obtain certification from the International Society of Arboriculture (ISA).**

See PacifiCorp’s answers below.

1. **Explain in full and complete detail how PC dictates and influences the qualifications of and the training of contracted VM personnel.**

Through the PacifiCorp procurement department, as part of the evaluation for a master services agreement, the individual companies’ training programs are reviewed and given approval to proceed to the next step by a panel of procurement and vegetation staff. Most questions below are a part of the individual contracting companies’ submission.

During the procurement process, PacifiCorp requires contractors to respond to several questions to determine if they will be allowed to receive a master services agreement contract. Responses are then evaluated.

PacifiCorp also identifies best management practices that should be followed, qualifications of contractors conducting inspections and line clearance work in sections 1.1, 1.2.1, and 2.1 of the VM SOP.

1. **Does PC include qualification and training requirements as part of VM contractor Request for Proposals (RFP)? If so, provide an example RFP outlining PC’s required qualifications and training of contracted VM personnel.**

PacifiCorp requires contractors submit responses to a Questionnaire as part of the RFP process. Questions regarding qualifications and training are included within the Questionnaire. Additionally, contractors are required to meet qualifications identified in the VM SOP as outlined in response to question 2.a., including frontline line manager ISA certification requirements, forest technician qualifications, and required designations to be held by personnel performing line clearance work.

Pertinent questions regarding training and qualifications include the following:

* *Provide the résumés/certificates/qualifications of proposed personnel who will supervise the vegetation management activity to be provided, or the proposed qualifications for people who would be supervising this work, if specific individuals are not identified. Designate the supervisory levels proposed to be involved to properly control and coordinate the work, including both at the site and at Contractor's office, or if applicable, in Company's office.*
* *Describe as specifically as possible the details of the training program required of all your employees to ensure proper and competent execution of vegetation management services, and all safety, health, environmental and security regulations pertaining to the performance of the Work. Detail your training program including qualification, annual retraining, safety training and skills demonstration.*
* *State what certifications you require by worker classification.*
* *Identify and provide customer service metrics you have in place. Specifically address your procedures and training for addressing customer refusals.*
* *Does your organization have a documented plan for providing environmental training for its workers?*
* *How do you assure your organizations employees performing work for PacifiCorp are adequately informed of applicable environmental issues and properly trained to correctly address them?*

An example Questionnaire is attached.

1. **Does PC require VM personnel (contracted and internal) to attend and pass initial, onboarding trainings focused on:**
	* 1. **PC’s VM SOP.**

Internal personnel study and understand the SOP before starting work and reviews are continually taking place with contractors in stand-up meeting. Contractors are provided copies of the SOP.

* + 1. **Wildfire risk reduction.**

With the increased emphasis placed on wildfire, contractors and company staff attend seminars and meetings when offered to enhance wildfire preparedness and awareness. Internal VM personnel are required to complete a Wildfire Preparedness, Prevention & Response training.

* + 1. **List any additional trainings VM personnel are required to attend and pass upon hiring.**

Internal VM personnel are required to take various company related trainings such as security, FERC standards of conduct, code of business conduct and environmental compliance training related to avian. The environmental compliance training is also reviewed with External VM personnel. External VM personnel may also take advantage of third-party training when offered or receive additional training from their employer. VM personnel must also keep their ISA certifications current, which may require continuing education credits.

1. **Does PC require VM personnel (contracted and internal) to attend and pass continuing education, “refresher” training? If so:**

PacifiCorp does not provide any formal VM training to VM personnel. The trainings identified in response to question 3.c. are required annually. PacifiCorp requires that ISA certifications are maintained, which requires the holders of these certifications to take continuing education credits in many cases. Through conducting audits and holding meetings with external VM personnel, PacifiCorp continuously informally reviewing and discussing specifications and work practices. Contractors may also provide additional training to external VM personnel.

* + 1. **How often does this “refresher” training occur?** See above.
		2. **What topics are covered?** See above.
1. **Provide a detailed explanation of how PC and its contractors track and verify VM training (both initial training and continuing, “refresher” education).**

Training delivered by PacifiCorp is tracked through training rosters to identify participants. PacifiCorp does not track training that may be delivered by the contractor. Completion of training by internal VM personnel is tracked through a Learning Management System that records and retains training completed and dates completed. Information is entered manually from the training rosters or automatically entered if the training was delivered online through the management system.

1. **Explain if and how PC and its contractors track and measure recall and retention of VM training information after initial training is complete.**

Recall and retention is not specifically measured nor tracked. General understanding of the VM program (e.g. specifications) is indirectly evaluated through completing audits of completed work and informal discussions between internal and external VM personnel.

1. **Provide a detailed explanation of how PC and its contractors track, verify, and encourage VM personnel to obtain certification from the International Society of Arboriculture (ISA).**

Training delivered by PacifiCorp is tracked through training rosters to identify participants. PacifiCorp does not track training that may be delivered by the contractor. At the time of hire, expectations regarding ISA certifications are set with applicable internal and external VM personnel. It is a job requirement for applicable positions. Internal VM personnel are encouraged to obtain additional certifications that are not required, through manager to staff conversations and goal setting sessions.