

September 20, 2024

VIA OEIS E-FILING
(Docket #2023-2025 WMPs)

Office of Energy Infrastructure Safety
715 P Street, 20th Floor
Sacramento, CA 95814
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RE: Resubmission of PacifiCorp’s 2025 Wildfire Mitigation Plan Update

Dear Director Jacobs:

In accordance with the Office of Energy Infrastructure Safety’s September 6, 2024, Rejection and Order to Resubmit (Order), PacifiCorp d/b/a Pacific Power provides this revised 2025 Wildfire Mitigation Plan Update (2025 WMP Update) originally submitted on July 8, 2024. This submittal includes the following documents, which will be filed in Energy Safety Docket #2023-2025 WMPs and posted on the Company’s website:¹

- 1) 2025 WMP Update (standalone document) – Revision 1 (R1) [clean and redline]
- 2) Revised 2023-2025 Base WMP – Revision 5 (R5) [clean and redline]²
- 3) Three attachments from prior revisions to the 2023-2025 Base WMP:
 - CA Line Rebuild Data 2023-2025.xlsx (2023-2025 Base WMP Revision 3)
 - EFR Outage Summary and 2023 Data.xlsx [Revised August 01, 2024] (2023-2025 Base WMP Revision 4)
 - PC-23-07_Joint_IOU_CC Effectiveness Workstream_2025 WMP Report FINAL (2023-2025 Base WMP Revision 3)

Additional detail regarding the specific changes in each of the revised documents is provided below:

1) Revisions to 2025 Wildfire Mitigation Plan Update Rev 1

Substantive Changes:

- In response to finding 2a of the Order, PacifiCorp has removed “Active Wildfire De-energization” from Section 2.1, as Active Wildfire De-energization is not a program.
- Per direction from OEIS regarding finding 3, PacifiCorp has removed the RA-01 initiatives from Section 2.1.1 Table 2-1.

¹ <https://www.pacificorp.com/community/safety/wildfire-mitigation-plans.html>

² This submission includes the revisions in the Company’s August 19, 2024 submission of 2025 Wildfire Mitigation Plan 2025 Update Errata filing.

- In response to 4b of the Order, PacifiCorp has updated the 2025 targets presented in Table PAC 2-1 for AI-12: Quality Assurance / Quality Control, VM-03: Vegetation Inspections: Patrol Inspection - Distribution, VM-04: Vegetation Inspections: Patrol Inspection - Transmission, and VM-11: Quality assurance / Quality Control. There was no change in the 2025 target for AI-08: Enhanced (Infrared) Inspections in distribution lines in the Revised 2023-2025 Base WMP, and PacifiCorp did not update table 2-1 in the Update.
- In response to 4cii of the order, PacifiCorp has updated table 3-1 with quarterly inspection targets for AI-11: Substation Inspections, VM-01: Vegetation Inspections: Detailed Inspection – Distribution, VM-02: Vegetation Inspections: Detailed Inspection – Transmission, VM-03: Patrol Inspection - Distribution, VM-04: Patrol Inspection – Transmission.
- In response to 5b, PacifiCorp updated Table PAC 2-2 with an updated forecasted completion date for VM-11 initiatives and discussed the reason for the change in forecasted completion date.
- In response to 6a-b in the Order, PacifiCorp has updated Areas for Continued Improvement (ACI) with additional information. Substantive updates were provided on ACIs:
 - PC-23-01. Cross-Utility Collaboration on Risk Model Development
 - PC-23-03. PSPS and Wildfire Risk Trade-Off Transparency
 - PC-23-04. Collaboration Between Vendor and Utility Risk Teams
 - PC-23-05. Independent Review Plan Transparency
 - PC-23-06. Vendor Fire Risk Model Implementation Milestones and Dates
 - PC-23-09. QA/QC Pass Rate Targets for Rural Areas
 - PC-23-14. Asset Management and Enterprise Systems
 - PC-23-15. Continued Monitoring of Enhanced Fire Risk (EFR) Settings
 - PC-23-18. Emergency Resources Availability
- In response to 7a, PacifiCorp has updated table numbers in the Update to align with WMP Update technical guidelines.

Non-Substantive Changes:

- Corrected references to the revised 2023-2025 Base WMP to align with OEIS guidance
- Removed footnote references where the language is in the 2025 WMP Update
- Updated links
- Validated percent changes for Tables PAC 2-1, PAC 2-2, and 3-1
- Added table 1-2 to meet technical guidelines
- Corrected spelling and grammar
- Formatted tables for consistency
- Updated page numbers, section, and figure references.

2) Revisions to the 2023-2025 Base Wildfire Mitigation Plan Revision 5

Substantive Changes:

- In response to finding 1a of the Order, PacifiCorp has scoped Table PAC 7-2 to the mitigations PacifiCorp is undertaking and not ones that may be considered or is not performing.
- In response to 4a, PacifiCorp has updated Tables 8-3 and 8-4 to reflect changes in 2025 targets for AI-05: Transmission Patrol Inspections, and GH-01: Line Rebuild – Covered Conductor Installation, respectively.
- In response to 4c(i) of the Order, PacifiCorp has updated Table 8-4 with inspection targets for AI-05: Transmission Patrol Inspections and AI-12: Quality Assurance / Quality Control.
- In response to 5a, PacifiCorp has confirmed and updated Table 8-15 with 2025 targets for VM-01: Vegetation Inspections: Detailed Inspection – Distribution, VM-02: Vegetation Inspections: Detailed Inspection – Transmission, VM-03: Vegetation Inspections: Patrol Inspection - Distribution, VM-04: Vegetation Inspections: Patrol Inspection - Transmission, and VM-11: Quality assurance / Quality Control.
- In response to 5b, PacifiCorp has updated Table 8-14 with an updated forecasted completion date for VM-11 Initiatives that were previously marked have a forecasted completion date as “deferred.”
- In response to 7b, PacifiCorp has updated table numbers in the Revised Base 2023-2025 WMP to align with WMP technical guidelines¹. Appendix A has the table numbers as submitted in the approved Revised Base 2023-2025 WMP Rev 4, and the revised table numbers submitted in the Revised Base 2023-2025 WMP Rev 5. In the course of this revision, PacifiCorp identified two required tables, 7-4: Summary of Risk Reduction for Top-Risk Circuits and 8-32: Example of Fire Potential Index Features, that were not previously submitted and are now included in the Revised Base 2023-2025 WMP Rev 5.
- In response to 8a-b, PacifiCorp has updated the Revised Base 2023-2025 WMP Rev 5 to reflect the changes to prioritization and planning of grid hardening initiatives, asset inspection and vegetation management because of the establishment of a High Fire Risk Area (HFRA). This is discussed in sections 7.1.3, 8.1.3, 8.2 of the Revised Base 2023-2025 WMP Rev 5.
- In response to 8c, PacifiCorp has updated Figure 5-20: Social Vulnerability Index Map, to include the HFRA.
- In response to 9a, PacifiCorp has included the original Table 6-7 from the approved Base 2023-2025 WMP.
- Per the direction of OEIS, submitting updated attachment EFR Outage Summary and 2023 Data Updated 08012024.xlsx.

Non-Substantive Changes:

- Corrected spelling and grammar
- Formatted tables for consistency
- Updated page numbers, section, and figure references

If you have any questions regarding this request, please contact Pooja Kishore, Regulatory Affairs Manager at (503) 813-7314.

Sincerely,



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