



State of California – A Natural Resources Agency
OFFICE OF ENERGY INFRASTRUCTURE SAFETY
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Gavin Newsom, Governor
Caroline Thomas Jacobs, Director

TRANSMITTED VIA ELECTRONIC MAIL

DATA REQUEST

Request Date: Tuesday, July 15, 2025

Response Due: Friday, July 18, 2025

To: Pooja Kishore, Regulatory Affairs Manager
Pooja.Kishore@pacificorp.com
PacifiCorp dba Pacific Power
825 NE Multnomah Street, Suite 2000
Portland, OR 97232

Cc: datareq@pacificorp.com
Melissa Swenson, PacifiCorp
Bruce Dao, PacifiCorp

Originator: Jolynne Flores, Wildfire Safety Analyst
Jolynne.Flores@energysafety.ca.gov

Data Request Number: OEIS-P-WMP_2025-PC-01

Subject(s):

- Q01. Regarding Vegetation Management Inspection Targets
- Q02. Regarding the Scope of Work Orders
- Q03. Regarding PacifiCorp's Updated Mobile Data Management System
- Q04. Regarding Compliance with GO 95, Rule 18B Corrective Action Timelines

INSTRUCTIONS

1. Provide all information in your possession, custody, or control, or the possession, custody, and/or control of your affiliates or agents, that is responsive to these data requests by the due date identified above.
2. Responses and documents may be produced and served electronically, but they must be fully machine-readable and searchable.
3. If you have any questions about the meaning or scope of the data requests herein, direct such questions to the Energy Safety staff identified as the “Originator” of this request at your earliest opportunity.
 - a. Lack of clarity on meaning or scope of requests without prior request for clarification to the “Originator” will not be a permissible reason for incomplete responses and will be regarded as non-compliance with the request.
4. Identify the personnel (e.g., employees, consultants, agents, etc.) who provided information responsive to each of the data requests below. As used in this context herein, “identify” means to provide the full name, email, business address, and title of each employee, consultant, or agent who provided such information.
5. If you do not know the exact answer to any of the requests below, please so indicate and provide your best estimate.
6. Provide data in its original format (e.g., Excel, GIS shapefile, etc.), unless otherwise specified in the request.
7. Submit your response to the 2026-2028 WMP Data Requests docket (#2026-2028-Base-WMP-DRs) by close of business on the response due date.
 - a. Submit confidential information through the confidential e-filing process. Do not submit confidential responses through email.
 - b. If you try to submit a file that is not permissible in the docket, please reach out to your Energy Safety “Originator”.
8. Email the non-confidential portion of the response to Jolynne Flores (jolynne.flores@energysafety.ca.gov), copying:
 - a. Nicole Dunlap (Nicole.Dunlap@energysafety.ca.gov)
 - b. Dakota Smith (Dakota.Smith@energysafety.ca.gov)
 - c. Surya Keshav (Surya.Keshav@energysafety.ca.gov)
 - d. Eli Weissman (Eli.Weissman@energysafety.ca.gov)

REQUEST

Q01. Regarding Vegetation Management Inspection Targets:

On page 268 of its 2026-2028 Base WMP, for Off-cycle Distribution Inspections (VM-03), Table 9-3, describes the “Area Impacted” as “lines within or that intersect HFTD Tier 2 or Tier 3, HFRA” and “Frequency” as “Annual.”¹ On page 266, for Off-cycle Distribution Inspections, Table 9-2, “% HFTD Covered in 2026” as “86%.”

- a. Does PacifiCorp intend the Off-cycle Distribution Inspection target to cover less than 100 percent of PacifiCorp’s HFTD distribution lines?
 - i. If yes:
 1. Explain why PacifiCorp does not perform off-cycle distribution inspections on 100 percent of the HFTD.
 2. Explain how PacifiCorp identifies risk from vegetation on overhead distribution lines within the HFTD that are not part of Off-cycle Distribution Inspections.
 - ii. If no:
 1. Provide the calculation used to determine “% HFTD Covered” for “Off-Cycle (Patrol) Inspection – Distribution (FIN).”
 2. Confirm whether the same method used to determine “% HFTD Covered” for “Off-Cycle (Patrol) Inspection – Distribution (FIN)” was used for all “% HFTD Covered in 2026” values in Table 9-2.

Q02. Regarding the Scope of Work Orders:

On page 314 of its 2026-2028 Base WMP, PacifiCorp states that “specific work orders are not issued for each work location, but rather one work release is issued for the entire power line being worked.”

- a. Define “entire power line” (e.g., a circuit, a number of circuit miles, a number of spans, a circuit protection zone, etc.).
- b. Define “work release.”
- c. Explain how PacifiCorp divides a “work release” into its components (e.g., work locations, spans, trees, etc.).

¹ PacifiCorp, [2026-2028 Base Wildfire Mitigation Plan](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=58907&shareable=true), Published July 11, 2025, URL:(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=58907&shareable=true>).

Q03. Regarding PacifiCorp’s Updated Mobile Data Management System:

On page 314 of its 2026-2028 Base WMP, PacifiCorp states that it “does not have a formal system for tracking ‘open’ work locations through time; however, ‘open’ work locations may be identified through a comparison of inventories to work complete records. This may change through implementation of PacifiCorp's updated MDMS.”²

- a. Describe how PacifiCorp has or will update its MDMS system to allow it to track open and completed work orders.

Q04. Regarding Compliance with GO 95, Rule 18B Corrective Action Timelines:

On page 315 of its 2026-2028 Base WMP, PacifiCorp states that “at present, work locations are not formally assigned priorities. This may change with the implementation of PacifiCorp’s updated MDMS.”

- a. Explain how PacifiCorp’s vegetation management and inspections programs comply with GO 95, Rule 18-B, which requires that an “auditable maintenance program must include...a timeline for corrective actions to be taken following the identification of a potential violation of GO 95 or a Safety Hazard on the company’s facilities.”³
- b. Explain how PacifiCorp complies with GO 95, Rule 18-B1, which requires PacifiCorp to “undertake corrective actions within the time periods stated for each of the priority levels set forth” in Rule 18-B1.

END OF REQUEST

² PacifiCorp, [2026-2028 Base Wildfire Mitigation Plan](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=58907&shareable=true), Published July 11, 2025, URL:(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=58907&shareable=true>).

³ California Public Utilities Commission, [Rules for Overhead Electric Line Construction](https://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M550/K438/550438485.pdf), Revised December 19, 2024, pages I-8 to I-11, URL:(<https://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M550/K438/550438485.pdf>).