



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: Friday, September 12, 2025

Response Due: Wednesday, September 17, 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-10

Subject(s):

- Q01. Regarding Enterprise Systems Assets Identification
- Q02. Regarding Identifying 100 Percent Asset Identification
- Q03. Regarding Climate Vulnerability Assessment

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, Wildfire Safety Analyst Jolynne.Flores@energysafety.ca.gov, copying:
 - a. Dakota Smith (Dakota.Smith@energysafety.ca.gov)
 - b. Steve Kerr (Steve.Kerr@energysafety.ca.gov)
 - c. Surya Keshav (Surya.Keshav@energysafety.ca.gov)
 - d. Robert Warwick (Robert.Warwick@energysafety.ca.gov)

REQUEST

Q01. Regarding Enterprise Systems Assets Identification

On page 439 of PacifiCorp’s 2026-2028 Base WMP, it states that it performs a “periodic audit on the most crucial wires and substation data.”¹

- a. Describe the “periodic audit.” What does the audit entail?
- b. Define “periodic.” Is this periodic audit performed on a pre-determined schedule?
 - i. If yes, define the schedule and specify for what “crucial wires and substation data.”
 - ii. If not, describe what triggers a periodic audit to be performed?
- c. How many “periodic audits” were performed in:
 - i. 2023
 - ii. 2024
 - iii. 2025 (to date)
- d. Provide the most recently completed “periodic audit.”

Q02. Regarding Identifying 100 Percent Asset Identification

The WMP Guidelines require that the electrical corporation provide its “process for integrating 100 percent asset identification or its justification if not currently in place.”² On page 438 of PacifiCorp’s 2026-2028 Base WMP, it discusses its process for validating “asset information between GIS and SAP and GIS and Maximo.”

- a. Provide the percentage of total assets PacifiCorp has stored in:
 - i. GIS (i.e., number of “wires assets” stored in PacifiCorp’s GIS system divided by total number of wires assets).
 1. If PacifiCorp is not aware of its total number of wires assets throughout its California service territory, indicate what percentage of wires assets it believes it is aware of.
 - ii. SAP (i.e., number of “wires asset” used for planning of asset inspections stored in SAP divided by total number of wires asset).
 1. If PacifiCorp is not aware of its total number of wires asset throughout its California service territory, indicate what percentage of wires assets it believes it is aware of.
 - iii. Maximo (i.e., number of assets for “substation equipment” stored in Maximo divided by total number of assets for substation equipment).

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>).

² Office of Energy Infrastructure Safety, [Wildfire Mitigation Plan Guidelines](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=58026&shareable=true), Published February 24, 2025, URL:(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=58026&shareable=true>).

1. If PacifiCorp is not aware of its total number of substation equipment throughout its California service territory, indicate what percentage of substation equipment it believes it is aware of.
- iv. Total number of assets (and percentage of total) not stored in either SAP, GIS, or Maximo.

Q03. Regarding Climate Vulnerability Assessment

On page 41 of PacifiCorp’s 2026-2028 Base WMP, it states, “PacifiCorp has not performed a climate vulnerability assessment.... PacifiCorp is actively participating in the EPRI Climate READi study and with Argonne National Labs to assess climate change impacts within its service territory.” In Table 10-1, PacifiCorp lists initiative, “Climate Vulnerability Assessment” (SA-05), which has a 2026 qualitative target of “Study underway,” “Study delivered” for 2027, and “N/A” for 2028.

- a. Describe the project scope for the “EPRI Climate READi study” and how “PacifiCorp is actively participating.”
- b. Describe the project scope for PacifiCorp’s participation with Argonne National Labs.
- c. Does PacifiCorp anticipate that the EPRI Climate READi study and its work with Argonne National Labs will lead to its Climate Vulnerability Assessment? Explain.
- d. Provide all project steps for the Climate Vulnerability Assessment (SA-05) targets, with specific outcomes and timeline for each step, from inception to completion.
- e. What actions does PacifiCorp anticipate taking because of the “Climate Vulnerability Assessment” study referenced in Table 10-1 once the study is delivered in 2027.
- f. What information and outputs from the study referenced in Table 10-1 does PacifiCorp anticipate incorporating into its risk modeling efforts?

END OF REQUEST