



State of California – A Natural Resources Agency
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Gavin Newsom, Governor
Caroline Thomas Jacobs, Director

TRANSMITTED VIA ELECTRONIC MAIL

DATA REQUEST

Request Date: Tuesday, September 30, 2025

Response Due: Friday, October 3, 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-11

Subject(s):

- Q01. Regarding WMP Expenditure Amounts by Total Territory and HFTD
- Q02. Regarding 2026-2028 Base WMP Mitigation Activity in HFTD and Non-HFTD
- Q03. Regarding What is Needed to Enable a Break Down of HFTD and Non-HFTD Expenditures
- Q04. Regarding PacifiCorp Plans to Track HFTD and Non-HFTD WMP Expenditures

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)
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 - e. Mohamed Allahabi (Mohamed.Allahabi@energysafety.ca.gov)

REQUEST

Q01. Regarding WMP Expenditure Amounts by Total Territory and HFTD

The Energy Safety Data Guidelines require an electrical corporation to submit 2026-2028 Base WMP Tabular Wildfire Mitigation Data.¹ Within its WMP data submission, the electrical corporation is required to submit “actual and projected costs of initiatives in Wildfire Mitigation Data Table 11” and the electrical corporation must provide those expenditure amounts “broken out by total territory and HFTD.”² In PacifiCorp’s data submission,³ for every mitigation area other than Grid Design, Operations, and Maintenance, PacifiCorp did not break out its expenditure amounts by total territory and HFTD.

- a. Provide an explanation for each mitigation category shown below, where PacifiCorp did not break out its projected expenditure amounts for by total territory and HFTD, why PacifiCorp did not break out its projected expenditure amount by total territory and HFTD.
 - i. Risk Methodology
 - ii. Wildfire Mitigation Strategy
 - iii. Vegetation Management
 - iv. Situational Awareness
 - v. Emergency Preparedness, Collaboration and Public Awareness
 - vi. Enterprise Systems
- b. Explain why PacifiCorp was able to provide a breakout of its projected expenditure amount for the Grid Design, Operations, and Maintenance mitigation area by total territory and HFTD.

Q02. Regarding 2026-2028 Base WMP Mitigation Activity in HFTD and Non-HFTD

For the mitigation categories below, provide, in percentages, the amount of mitigation activity that is planned to occur in the HFTD and Non-HFTD during the 2026-2028 Base WMP period? If PacifiCorp is not aware of the amount of mitigation activity that is planned to occur in the HFTD and Non-HFTD, explain the HFTD/Non-HFTD mitigation activity breakdown PacifiCorp is aware of as of 2025.

- a. Risk Methodology
- b. Wildfire Mitigation Strategy
- c. Grid Design, Operations, and Maintenance

¹ Data Guidelines, pages 165-167.

² Data Guidelines, pages 165-166. Note: in Table 11’s “HFTD TIER” field, the “Territory” category represents the entire electrical corporation’s service territory, including HFTD. The “HFTD” category represents *a subset of the territory category*.

³ PacifiCorp [PC 2026-WMP R0](#), Published July 23, 2025

(URL:<https://efiling.energy.ca.gov/eFiling/Getfile.aspx?fileid=59034&shareable=true>).

- d. Vegetation Management
- e. Situational Awareness
- f. Emergency Preparedness, Collaboration and Public Awareness
- g. Enterprise Systems

Q03. Regarding What is Needed to Enable a Break Down of HFTD and Non-HFTD Expenditures

Explain what PacifiCorp would need (e.g., software, processes, policies) to enable it to break out its WMP expenditure amounts by total territory and HFTD?

- a. For recorded expenditures (e.g., 2024-2025).
- b. For projected expenditures.

Q04. Regarding PacifiCorp Plans to Track HFTD and Non-HFTD WMP Expenditures

- a. What plans, if any, does PacifiCorp have to enable it to record and project which WMP expenditures are in the HFTD and which are in the Non-HFTD?
- b. If a plan exists, provide all milestones, descriptions of each step, target implementation dates to implement its plan to enable it to track which WMP expenditures are in the HFTD and Non-HFTD, and a copy of the plan.
- c. If a concept of a plan exists, describe the current state of the conceptual plan with all milestones, descriptions of each step, and target implementation dates to implement its plan to enable it to track which WMP expenditures are in the HFTD and Non-HFTD.

END OF REQUEST