



State of California – A Natural Resources Agency  
**OFFICE OF ENERGY INFRASTRUCTURE SAFETY**  
715 P Street, 15th Floor | Sacramento, CA 95814  
916.902.6000 | [www.energysafety.ca.gov](http://www.energysafety.ca.gov)

Gavin Newsom, Governor  
Caroline Thomas Jacobs, Director

**TRANSMITTED VIA ELECTRONIC MAIL**

## **DATA REQUEST**

**Request Date:** Friday, October 31, 2025

**Response Due:** Wednesday, November 5, 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-12

### **Subject(s):**

- Q01. Regarding Wood and Slash Management Tracking
- Q02. Regarding PacifiCorp's Substation Defensible Space Management Program

## 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](mailto:Jolynne.Flores@energysafety.ca.gov), copying:
  - a. Dakota Smith ([Dakota.Smith@energysafety.ca.gov](mailto:Dakota.Smith@energysafety.ca.gov))
  - b. Steve Kerr ([Steve.Kerr@energysafety.ca.gov](mailto:Steve.Kerr@energysafety.ca.gov))
  - c. Surya Keshav ([Surya.Keshav@energysafety.ca.gov](mailto:Surya.Keshav@energysafety.ca.gov))
  - d. Alec Latuszek ([Alec.Latuszek@energysafety.ca.gov](mailto:Alec.Latuszek@energysafety.ca.gov))

## REQUEST

### **Q01. Regarding Wood and Slash Management Tracking**

On page 292 of its 2026-2028 Base WMP, PacifiCorp states that “PacifiCorp’s wood and slash/debris management practices are part of the base vegetation management program. PacifiCorp manages or disposes of debris typically less than six inches in diameter, through the following typical methods, chipping and hauling offsite, chipping and broadcast onsite, and lop and scatter in accordance with industry best management practices.”<sup>1</sup>

- a. Does PacifiCorp document and track the management of wood and slash/debris that is a byproduct of vegetation management work?
  - i. If yes:
    1. Describe the documentation and record-keeping methods PacifiCorp uses.
    2. List the data fields that PacifiCorp uses as a part of the wood and slash/debris management tracking process.
    3. Describe any limitations to PacifiCorp’s wood and slash/debris management documentation and record-keeping that prevents PacifiCorp from documenting and tracking all wood and slash/debris that is a byproduct of vegetation management work.
  - ii. If no, explain:
    1. How PacifiCorp ensures it completes wood and slash/debris management in all vegetation management treatment areas according to the procedures outlined in Section 9.5 of its 2026-2028 Base WMP.
    2. If PacifiCorp can verify wood and slash/debris management only in some vegetation management treatment areas, specify which wood and slash/debris management activities it can and cannot ensure are completed.

### **Q02. Regarding PacifiCorp’s Substation Defensible Space Management Program**

On page 222 of its 2023-2025 Base WMP R6, in reference to substation defensible space inspections, PacifiCorp stated that it “performs substation inspections for vegetation to remove overhang limbs or climbable vegetation and remove weeds. As part of the detailed and patrol inspections, hazard trees are identified and mitigated to address fall-in risk.”<sup>2</sup>

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<sup>1</sup> 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>).

<sup>2</sup> PacifiCorp, [2023-2025 Base Wildfire Mitigation Plan Revision 6](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57823&shareable=true), Published January 17, 2025, URL:(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57823&shareable=true>).

On page 295 of its 2026-2028 Base WMP, in reference to PacifiCorp’s Substation Defensible Space (VM-13) target, PacifiCorp states that it “is developing a process to address hazard trees that are outside of the substation property.” The 2026–2028 Base WMP does not indicate that detailed and patrol inspections will continue to identify and mitigate fall-in risk to substation facilities as the previous Base WMP did.

- a. Explain why PacifiCorp omitted from its 2026–2028 Base WMP the description that detailed and patrol inspections identify and mitigate hazard trees to address fall-in risk to substations, as included in its 2023–2025 Base WMP.
- b. When developing its VM-13 target for its 2026-2028 Base WMP, explain how PacifiCorp considered:
  - i. The risk of hazard trees located within substation properties.
  - ii. The inspection and mitigation of hazard trees located outside of substation properties.

**END OF REQUEST**