



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: Wednesday, November 26, 2025

Response Due: Wednesday, December 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
Lakshmi Nair, PacifiCorp

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

Data Request Number: OEIS-P-WMP_2025-PC-13

Subject(s):

- Q01. Regarding Risk Score Calculations
- Q02. Regarding Overall Utility Risk Normalization
- Q03. Regarding PacifiCorp's Wildfire Intelligence Center
- Q04. Regarding PacifiCorp's Wildfire and Emergency Response Team
- Q05. Regarding More Weather Stations for Surgical PSPS Events
- Q06. Regarding PacifiCorp's Mapping of ESS Outages
- Q07. Regarding Public Communications and Outreach to Non-account Holders
- Q08. Regarding Public Communications and Outreach to AFN Customers
- Q09. Regarding Lessons Learned WMP Guidelines Requirements

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. Paul Ramstad (Paul.Ramstad@energysafety.ca.gov)
 - e. Andie Biggs (Andie.Biggs@energysafety.ca.gov)

REQUEST

Q01. Regarding Risk Score Calculations

- a. On page 88 of its 2026-2028 Base WMP R0, *Figure PAC 5-10: Combined Composite Risk Score Calculation*, the calculation indicates the final value should be between 0 and 1.¹ On pages 102-103, *Table 5-5: Summary of Top-Risk Circuits, Segments, or Spans*, the Wildfire Risk Score provided in Table 5-5 is not between 0 and 1.
 - i. Provide an explanation of how Wildfire Risk Score in Table 5-5 is calculated.
 - ii. If the Wildfire Risk Score shown in Table 5-5 is not the Combined Composite Risk Score, provide the Combined Composite Risk Score Calculations for the circuits provided in Table 5-5.
- b. On page 55, *Figure PAC 5-2: Wind Risk and Fuel/Terrain Risk Calculation*, weighted input variables are summed to produce the final Wind Risk and Fuel / Terrain Risk.
 - i. Are all weighted input variables scaled to be between 0 and 1?
 1. Provide a sample calculation of Wind Risk and Fuel / Terrain Risk for a specific circuit, clearly showing input values and any weighting applied.
 - ii. If all weighted input variables are not scaled to be between 0 and 1, provide a justification for how the weighted sum function effectively captures the various risk input components.

Q02. Regarding Overall Utility Risk Normalization

- a. On pages 93-94 of its 2026-2028 Base WMP R0, *Table 5-4: Summary of Risk Models*, PacifiCorp states, “Composite risk score is a 1 to 5 rating based on normalization of combined outputs.”
 - i. Provide a narrative description of this normalization methodology.
 - ii. Provide the composite risk scores calculated with this normalization methodology.

Q03. Regarding PacifiCorp’s Wildfire Intelligence Center

On page 444 of its 2026-2028 Base WMP R0, PacifiCorp stated that a 2024 lesson learned is that “Utilizing existing roles/functions for situational awareness for wildfires was a challenge.” Its proposed WMP improvement was to establish its Wildfire Intelligence Center (WIC) in 2025.

- a. On page 391, PacifiCorp stated that “PacifiCorp’s Wildfire Intelligence Center was modeled after the best practices and insights of PG&E, Southern California Edison,

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>).

and SoCal Gas.” Describe the scope of PacifiCorp’s Wildfire Intelligence Center and the best practices incorporated.

- b. When it was established or when will it be established?
- c. Explain how the WIC has helped, or may help, alleviate the challenge of “Utilizing existing roles/functions for situational awareness for wildfires.”

Q04. Regarding PacifiCorp’s Wildfire and Emergency Response Team

On pages 444 of its 2026-2028 Base WMP R0, PacifiCorp states that a 2024 lesson learned is that its Emergency Preparedness external communications “relationships need to be bolstered to improve real time ability to coordinate” due to the 90 counties it serves in six states. Its proposed WMP improvement is to establish a Wildfire and Emergency Response Team.

- a. Based on the experience PacifiCorp gained in 2025, how has the Wildfire and Emergency Response Team impacted its emergency management relationships in real time? Provide three examples.
- b. If there are no examples, provide a full description of how PacifiCorp envisions the Wildfire and Emergency Response Team will function.

Q05. Regarding More Weather Stations for Surgical PSPS Events

On pages 444 of its 2026-2028 Base WMP R0, lesson learned for PSPS Decision Making, PacifiCorp mentions that “During PSPS, uniform conditions must be assumed on circuits with only one weather station.” To improve the situation, PacifiCorp plans to install five weather stations in 2026 and four in 2027² to “Increase the number of weather stations near the [Wildland Urban Interface] border.”

- a. Provide the study or analysis that established that the nine weather stations are the appropriate number of weather stations to “Increase the number of weather stations near the WUI border.”
- b. If no study or analysis was done, explain how the number of weather stations to install at the WUI border(s) was established.

Q06. Regarding PacifiCorp’s Mapping of ESS Outages

On page 444 of its 2026-2028 Base WMP R0, lesson learned for Public Communications and Outreach, PacifiCorp states, “When there are outages on due to ESS ... they want information on why the outage is happening.” PacifiCorp’s planned WMP improvement for 2025 was “Updated outage map to show if an outage is due to an Emergency De-energization or on a circuit with ESS.”

² PacifiCorp 2026-2028 Base WMP R0, Table 10-1: Situational Awareness Targets by Year, page 325

- a. When did (or will) PacifiCorp enable its outage map to show if an outage is due to an Emergency De-energization or on a circuit with ESS?
- b. Provide all feedback PacifiCorp received from its public safety partners on the new outage map capabilities.
- c. Does PacifiCorp intend to make further changes to better communicate with its public safety partners on the nature of system outages? If yes, please describe.

Q07. Regarding Public Communications and Outreach to Non-account Holders

On page 445 of its 2026-2028 Base WMP R0, PacifiCorp states that “Non-account holders ... do not receive notifications of PSPS, ESS or Emergency De-energization Outages, which go to the customer of record.” On page 379, *Table 11-1: Emergency Preparedness and Community Outreach Targets by Year*, PacifiCorp’s target for the mitigation activity is to “create alerts system for non-account holders to register for outage/emergency alerts.” The full scope of the work is to be completed in 2026.

- a. Describe the process PacifiCorp will use for non-account holders to register for outage/emergency alerts. If the process is not yet designed, describe the plan concept as it currently exists.

Q08. Regarding Public Communications and Outreach to AFN Customers

On page 445 of its 2026-2028 Base WMP, PacifiCorp stated that “previously there has not been clear links between the AFN plan and WMP initiatives.” PacifiCorp’s proposed WMP improvement is that “AFN initiatives in the 2026-2028 WMP align with the objectives of the 2025 AFN Plan.” Explain.

Q09. Regarding Lessons Learned WMP Guidelines Requirements

On page 181 of the WMP Guidelines it states that the lessons learned narrative, “must also include lessons learned from prior catastrophic wildfires ignited by the electrical corporation’s facilities or equipment and findings from Energy Safety compliance audits and reports.”³

- a. Describe PacifiCorp’s lessons learned from prior catastrophic wildfires ignited by the electrical corporation’s facilities or equipment. Also include all information required in Table 13-1.
- b. Describe PacifiCorp’s lessons learned from Energy Safety compliance audits and reports. Also include all information required in Table 13-1.

³ 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](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=58026&shareable=true)).

END OF REQUEST