



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, December 5, 2025

Response Due: Wednesday, December 10, 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-15

Subject(s):

- Q01. Regarding Risk Modeling of HFTD
- Q02. Regarding Grid Hardening in PacifiCorp's HFRA and HFTD
- Q03. Regarding the Qualus Audit of Priority A conditions
- Q04. Regarding the Number of Non-Exempt Expulsion Fuses in PacifiCorp's HFRA and HFTD

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. Johan Im (Johan.Im@energysafety.ca.gov)
 - d. Surya Keshav (Surya.Keshav@energysafety.ca.gov)
 - e. Andie Biggs (Andie.Biggs@energysafety.ca.gov)
 - f. Ethan Campos (Ethan.Campos@energysafety.ca.gov)
 - g. Will Dundon (Will.Dundon@energysafety.ca.gov)

REQUEST

Q01. Regarding Risk Modeling of HFTD:

- a. Does PacifiCorp’s risk model that is used to provide the results provided in its 2026-2028 Base WMP, model its entire California service territory, just the HFTD, or some other area?
 - i. If PacifiCorp’s risk model only covers the HFTD, explain how PacifiCorp determined its HFRA.
- b. In PacifiCorp’s response to data request 11, question 1, it states, “Activities regarding risk modeling ... are performed for the total territory and do not differentiate between the High Fire Threat District (HFTD) and non-HFTD.”¹
 - i. What does PacifiCorp mean by “total territory” (e.g., PacifiCorp’s California service territory? PacifiCorp’s six-state service territory? Other?)
 - ii. Explain which risk modeling activities are included for the “total territory” versus the HFTD, if there is any difference.

Q02. Regarding Grid Hardening in PacifiCorp’s HFRA and HFTD:

Provide the percentage of grid hardening work planned in each of the following categories, based on total annual grid hardening circuit mileage planned in PacifiCorp’s California service territory:

	Undergrounding			Covered Conductor		
	HFTD	HFRA	Non-HFTD HFRA	HFTD	HFRA	Non-HFTD HFRA
2026						
2027						
2028						

Q03. Regarding the Qualus Audit of Priority A conditions:

In Attachment G to its 2026-2028 Base WMP R1, PacifiCorp submitted an external audit of priority A conditions created from 2020-2023.² Of the 581 priority A conditions reviewed, all were found to have been properly classified, and all conditions that were PacifiCorp’s responsibility to remediate were corrected on time. None of the 581 conditions were found to

¹ PacifiCorp [response to Data Request 11](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=59468&shareable=true), Published October 3, 2025, URL:(https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=59468&shareable=true).

² PacifiCorp 2026-2028 Base WMP R1, [Attachment G](#), PC-25U-07 PacifiCorp Imminent Threat Condition Review (Third-Party Audit), Published November 26, 2025, URL:(https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=59782&shareable=true).

meet the requirements of a Level 1 condition. In its 2023 Q4 QDR submission PacifiCorp reported 103 wire-down events from 2020-2023.

- a. Were the 103 wire-down events reported by PacifiCorp included in the audit?
 - i. If yes, explain why the wire-down events were not considered Level 1 conditions.
 - ii. If not, provide:
 1. A discussion of why these events were not included in the audit.
 2. The number of priority A conditions identified from 2020-2023 that were not included in the audit.

Q04. Regarding the Number of Non-Exempt Expulsion Fuses in PacifiCorp's HFRA and HFTD:

- a. Provide an estimate of the number of installed non-exempt expulsion fuses in PacifiCorp's HFRA and HFTD that will require replacement over the lifetime of initiative GH-05, as of January 1, 2026.
- b. Provide a description of how PacifiCorp calculated this estimate.

END OF REQUEST