



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:** Tuesday, July 22, 2025

**Response Due:** Friday, July 25, 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-03

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

- Q01. Regarding Validation of Asset Information
- Q02. Regarding Replacement of Vegetation Management Work Management System
- Q03. Regarding Enhanced Overhang Reduction Pilot
- Q04. Regarding Zones of Protection
- Q05. Regarding Weather Station Outages
- Q06. Regarding Risk Reduction Percentages
- Q07. Regarding Fire Potential Index
- Q08. Regarding Prioritized Risk Drivers

## 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. Nicole Dunlap ([Nicole.Dunlap@energysafety.ca.gov](mailto:Nicole.Dunlap@energysafety.ca.gov))
  - b. Dakota Smith ([Dakota.Smith@energysafety.ca.gov](mailto:Dakota.Smith@energysafety.ca.gov))
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  - h. Andie Biggs ([Andie.Biggs@energysafety.ca.gov](mailto:Andie.Biggs@energysafety.ca.gov))

## REQUEST

### **Q01. Regarding Validation of Asset Information:**

On page 438 of PacifiCorp’s 2026-2028 Base WMP, validation of asset information between various systems of record is completed “through manual input” and “periodic analysis is performed to ensure that the asset information in the three systems is materially aligned.”<sup>1</sup>

- a. Provide the procedure for updating the enterprise systems manually.
- b. Provide the procedure for this periodic analysis.
- c. Describe the process, including retention and re-verification, for handling data found during this analysis that does not match between the three systems.
  - i. Describe any planned updates to this process during the 2026-2028 Base WMP cycle.
- d. How often is this analysis performed?
- e. Describe how PacifiCorp confirms the data accuracy between the three systems.
- f. Provide the metrics PacifiCorp uses to track and monitor data accuracy.

### **Q02. Regarding Replacement of Vegetation Management Work Management System:**

On page 440 of PacifiCorp’s 2026-2028 Base WMP, PacifiCorp states “[v]egetation management is also replacing its work management system for managing vegetation. This initiative is in Table 12-1. GIS will continue to be a manual export to SFTP and the annual refresh to the vendor for MAPIT Fast/VM Optix will continue.”

- a. What work management system will PacifiCorp be using in the future for vegetation management purposes?
- b. What level of integration does the new work management system being used for vegetation management purposes have with other enterprise systems, including asset information, risk information, wildfire risk, etc.?
- c. There is no reference to what “SFTP” means. Provide detailed information about “SFTP” and its integration with other enterprise management systems.

### **Q03. Regarding Enhanced Overhang Reduction Pilot:**

On page 289 of PacifiCorp’s 2026-2028 Base WMP, PacifiCorp describes their “Enhanced Overhang Reduction Pilot” that culminated in 2025. PacifiCorp states “This pilot project targeted high-risk distribution circuits...”

- a. Provide the criteria PacifiCorp used to identify high-risk distribution circuits for the pilot.

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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>).

- i. If the Enhanced Overhand Reduction Pilot was implemented on a subset of PacifiCorp's high-risk distribution circuits, provide the criteria used to select the circuits included in the pilot.
- b. Provide the criteria PacifiCorp will use to determine whether to continue or discontinue the pilot.

**Q04. Regarding topic: Zones of Protection**

The term "Zones of Protection" (ZOP) is used multiple times in Section 10 in PacifiCorp's 2026-2028 Base WMP. PacifiCorp does not provide a definition of the term in the glossary.

- a. Provide a definition of the above term as it relates to its usage in Section 10.
- b. Provide a map of the "Zones of Protection" as they relate to Section 10 across the PacifiCorp service area in California.

**Q05. Regarding topic: Weather Station Outages**

Section 10.5.5, page 136, of the WMP Guidelines requires electrical corporations to provide an "acceptable percentage of weather station outages..." Page 370 of PacifiCorp's 2026-2028 Base WMP states, "PacifiCorp has not quantified an acceptable percentage of weather station outage."

- a. Provide an acceptable percentage of weather station outages in which PacifiCorp will still be able to operate without an increase in risk or impact to the PSPS decision making as outlined in the WMP Guidelines.
  - i. If PacifiCorp cannot provide what percentage of weather station outages it defines as acceptable, provide an explanation why it cannot.

**Q06. Regarding topic: Risk Reduction Percentages**

In Table 10-1, page 325, of PacifiCorp's 2026-2028 Base WMP, it shows that the percentage of risk reduction for all activities (SA-01, SA-02, SA-05, SA-06, MA-01) is "TBD".

- a. Provide an explanation for the lack of Risk Reduction values for all activities listed above.
- b. Provide a date when PacifiCorp will determine the amount of risk reduction for all activities listed above.

**Q07. Regarding topic: Fire Potential Index**

On page 371 of PacifiCorp's 2026-2028 Base WMP, it states that the Fire Potential Index (FPI) is a combined value of multiple inputs that, "...yields a range from categories from very low to extreme."

- a. Provide the complete range (i.e., 0-5, 6-9,10-15, 16-20) of (FPI) breakpoints and their associated categories (i.e., Very Low to Extreme).
- b. Provide the following information regarding the FPI breakpoints and how each is used in the initiation of PSPS events.
  - i. A detailed description of the weather conditions associated with each category of the FPI breakpoint (i.e., Very Low to Extreme).
  - ii. The initiation criteria for PSPS events for FPI breakpoint (i.e., Very Low to Extreme).
- c. Provide the following information regarding the FPI breakpoints and how they are used for actions taken in the field.
  - i. A detailed description of actions taken in the field that are associated with each FPI breakpoint (i.e., Very Low to Extreme).

**Q08. Regarding Prioritized Risk Drivers:**

Table 3-1 in PacifiCorp's 2026-2028 Base WMP (pages 34-38) shows how PacifiCorp is prioritizing various risk drivers throughout its service territory.

- a. Provide the data used to determine the percent of ignitions in HFTD provided in Table 3-1. This data should include the following via Excel:
  - i. Date of event
  - ii. Type of event (ignition, outage, fault, etc.)
  - iii. HFTD Designation (Tier 2, Tier 3, or non-HFTD)
  - iv. Risk
  - v. Risk Driver
  - vi. Topographical and Climatological Risk Factor(s)
- b. Provide the range of years used to determine the data provided in Table 3-1.
- c. On page 34 of its 2026-2028 Base WMP, PacifiCorp states that it "has limited data as there were only 21 ignitions tracked in the HFTD."
  - i. Provide the range of years that covers these ignitions.
  - ii. Provide the data for these ignitions, if not included in part (a), above.
- d. On page 34 of its 2026-2028 Base WMP, PacifiCorp states that it "does not track all ignition causes using the same categories as presented required in Table 3-1, and those are noted as 'Not tracked' in the table." Describe what categories are used instead, if applicable.
- e. On page 34 of its 2026-2028 Base WMP, PacifiCorp states that it "will seek to clarify and understand in order to categorize appropriately" for any unknown risks.
  - i. Describe what process PacifiCorp is undergoing to try and identify these risk drivers.
  - ii. When does PacifiCorp intend to complete this analysis?
  - iii. How is PacifiCorp working to minimize "unknowns" in the future?

- f. On page 34 of its 2026-2028 Base WMP, PacifiCorp states that “additional analysis is also required to examine the topographical issues relating to risk drivers and to understand any trends that are co-incident with certain drivers.” When does PacifiCorp intend to complete this analysis?
- g. Explain how PacifiCorp determined the priority numbers in Table 3-1? For instance, “Contact from object” has a priority of 4, despite having 0 percent of ignitions in the HFTD.

**END OF REQUEST**