



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: Friday, July 25, 2025

Response Due: Wednesday, July 30, 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-004

Subject(s):

- Q01. Regarding the Time Period to Address Immediate Vegetation Threats to Safety or Reliability
- Q02. Regarding Record Keeping for Immediate Vegetation Threats to Safety or Reliability
- Q03. Regarding the Incorporation of Risk-Based Prioritization Criteria into PacifiCorp's Mobile Data Management System (MDMS)
- Q04. Regarding Weather Station Totals
- Q05. Regarding Vegetation Management Activities Based on Weather Conditions
- Q06. Regarding PacifiCorp's Substation Defensible Space Management Program
- Q07. Regarding PacifiCorp's Workforce Planning Qualitative Target
- Q08. Regarding Integrated Vegetation Management Qualitative Targets
- Q09. Regarding Analysis of Emergency Resources for Responding to Faults and Ignitions
- Q10. Regarding Terrain Score, Wind Score, and Percent of Overall Utility Risk
- Q11. Regarding Line Rebuild, Covered Conductor Installation and Undergrounding
- Q12. Regarding Table 4-1 High-Level Service Territory Components
- Q13. Regarding Distribution and Transmission Pole Wraps

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. Nicole Dunlap (Nicole.Dunlap@energysafety.ca.gov)
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REQUEST

Q01. Regarding the Time Period to Address Immediate Vegetation Threats to Safety or Reliability:

In its response to Question 04 of Data Request OEIS-P-WMP_2025-PC-01, PacifiCorp states that it corrects “a Level 1 condition...immediately.”¹ GO 95, Rule 18(B)(1)(a)(i) defines a Level 1 condition as “an immediate risk of high potential impact to safety or reliability.”² Define “immediately” as it applies to correcting the following conditions:

- a. Transmission infrastructure:
 - i. Vegetation is likely to imminently contact electric facilities.
 - ii. Vegetation shows evidence of contact with electric facilities.
 - iii. Vegetation is contacting electric facilities.
- b. Distribution infrastructure:
 - i. Vegetation is likely to imminently contact electric facilities.
 - ii. Vegetation shows evidence of contact with electric facilities.
 - iii. Vegetation is contacting electric facilities.

Q02. Regarding Record Keeping for Immediate Vegetation Threats to Safety or Reliability:

In its response to Question 04 of Data Request OEIS-P-WMP_2025-PC-01 PacifiCorp states that, “a Level 1 condition is corrected immediately. Due to the need for an immediate response, the work location is communicated directly to PacifiCorp or other appropriate operations personnel; in other words, the work location does not need to be assigned a priority within the mobile data management software (MDMS) system, because the mobile data management software MDMS system is used to track more extended work flows.”

- a. Does PacifiCorp have a management system in place to keep records of Level 1 conditions it corrects?
 - i. If yes, describe the management system in place.
 - ii. If no, describe:
 1. Why PacifiCorp does not keep a record of Level 1 conditions it previously corrected.
 2. What plans PacifiCorp has, if any, to keep a record of Level 1 conditions it previously corrected.

¹ PacifiCorp, [Response to Data Request OEIS-P-WMP_2025-PC-01 Question 4](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=58952&shareable=true), Published July 18, 2025, URL:(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=58952&shareable=true>).

² California Public Utilities Commission, [Rules for Overhead Electric Line Construction](https://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M550/K438/550438485.pdf), Revised December 19, 2024, pages I-8 to I-11, URL:(<https://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M550/K438/550438485.pdf>).

Q03. Regarding the Incorporation of Risk-Based Prioritization Criteria into PacifiCorp's Mobile Data Management System (MDMS):

On page 520 of its 2026-2028 Base WMP, PacifiCorp states, "To address PC-23B-16 PacifiCorp will develop work prioritization to incorporate within its MDMS applicable to specific work activities."³

- a. Describe the process of incorporating risk-based prioritization criteria into PacifiCorp's MDMS application.
- b. By 2027, does PacifiCorp plan to operationalize risk-based work prioritization so that inspectors, tree crews, and others can assign priority to specific work locations?
 - i. If yes, describe any obstacles that may prevent incorporating risk-based prioritization criteria into its MDMS.
 - ii. If no, when does PacifiCorp plan to operationalize risk-based work prioritization?

Q04. Regarding Weather Station Totals:

On page 327 of its 2026-2028 Base WMP, PacifiCorp states that, "PacifiCorp owns and operates a network of weather stations...."

- a. Provide the total number of weather stations (MicroStations, remote automated weather station (RAWS), and portable stations) in the PacifiCorp network across the California service area.

Q05. Regarding Vegetation Management Activities Based on Weather Conditions:

On page 299 of its 2026-2028 Base WMP, PacifiCorp states that it "plans and executes operational changes to address wildfire risk during elevated fire weather conditions indicating increased ignition likelihood and wildfire potential."

- a. Describe the factors that trigger vegetation management operational changes (e.g., the fire potential index, fire weather watch conditions, red flag warning conditions, USFS Project Activity Level, etc.).
- b. Describe operational changes that vegetation management employees make to reduce the risk of ignition from vegetation management operations (e.g., ceasing the use of spark-producing equipment, patrolling non-HFTD locations, avoiding off-road travel, etc.).

³ 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>).

Q06. Regarding PacifiCorp’s Substation Defensible Space Management Program:

On page 295 of its 2026-2028 Base WMP, regarding substation defensible space, PacifiCorp states, “There are no specific operating procedures provided for contractors. Substation inspections follow substation inspection procedures.” Additionally, PacifiCorp states, “...substation inspections as described in Section 8.3.4 determine where vegetation may pose a current or future risk to substation equipment.” In its review of Section 8.3.4 of PacifiCorp’s 2026-2028 Base WMP and its Substation Inspection Asset Management Policy No. 034, Energy Safety did not identify language specific to the inspection of vegetation within substation properties.

- a. Provide procedural document(s) which require inspectors to perform vegetation inspections within substation properties.
 - i. If procedural documents do not exist, provide any plans PacifiCorp has to create procedural document(s) that are specific to the inspection of vegetation within substation properties.
- b. Explain PacifiCorp’s decision-making process for not creating operating procedures specific to substation defensible space management work within substation properties.
- c. Provide any plans PacifiCorp has to develop operating procedures specific to substation defensible space management work within substation properties.

Q07. Regarding PacifiCorp’s Workforce Planning Qualitative Target:

On page 264 of its 2026-2028 Base WMP, PacifiCorp provides a qualitative target for Workforce Planning (VM-15): “Vegetation Management and Inspections: Develop and implement formal inspection contractor benchmarking processes.” On page 321 of its 2026-2028 Base WMP, PacifiCorp states that its VM-15 qualitative target aims to “drive consistency among inspection contractors.”

- a. For each year of the 2026-2028 Base WMP cycle, provide the number of activities PacifiCorp will dedicate to:
 - i. Developing inspection contractor benchmarking processes.
 - ii. Implementing inspection contractor benchmarking processes.
- b. Provide a description of how PacifiCorp will implement inspection contractor benchmarking sessions (e.g., in-person meetings, online meetings, field days, etc.).
- c. List the topics that each benchmarking session will cover.
- d. List the collaborators PacifiCorp plans to benchmark inspection processes with (e.g., other electrical corporations, academics, consultants, etc.).
- e. Describe the anticipated outcomes from implementing formal inspection contractor benchmarking processes for each year of the WMP cycle.

Q08. Regarding Integrated Vegetation Management Qualitative Targets:

On page 264 of its 2026-2028 Base WMP, PacifiCorp provides two qualitative targets for its Integrated Vegetation Management initiative (VM-14).

- a. One qualitative target PacifiCorp provides is to “develop a process for conducting outreach to known nurseries participating in the tree replacement program.”
 - i. For each year of the 2026-2028 Base WMP cycle, detail steps PacifiCorp will take to develop a nursery outreach process.
 - ii. When does PacifiCorp plan to implement the process itself (i.e., transition from process development to implementation)?
 - iii. Describe how a process for nursery outreach will advance PacifiCorp’s tree replacement program.
 - iv. Describe what metrics PacifiCorp will track to determine the effectiveness of its new nursery outreach process?
- b. A second Integrated Vegetation Management target PacifiCorp provides is to “review and identify opportunities to expand use of tree growth regulator.”
 - i. Describe in detail the types of opportunities PacifiCorp will review to inform its expansion of tree growth regulator applications.
 - ii. Describe in detail how PacifiCorp will identify locations and tree species that are most compatible with tree growth regulator applications.
 - iii. For each year of its 2026-2028 Base WMP cycle, indicate the number of opportunities PacifiCorp hopes to identify for its expanded use of tree growth regulators.

Q09. Regarding Analysis of Emergency Resources for Responding to Faults and Ignitions

In pages 520-522 of its 2026-2028 Base WMP, PC-25U-10 Emergency Resources for Responding to Faults and Ignitions, PacifiCorp was required to provide an analysis of its prevention and suppression resources throughout its California service territory. PacifiCorp responded that, “By the end of 2028, PacifiCorp will discuss with other utilities their approach to fire prevention and suppression equipment to assess the Company’s adequacy of resources when responding to faults or suppressing ignitions.”

- a. Explain if PacifiCorp intends to “discuss with other utilities their approach to fire prevention and suppression equipment” in 2026 or 2027.
- b. Explain PacifiCorp’s decision-making process for “discuss[ing] with other utilities their approach to fire prevention and suppression equipment” by the end of 2028.
- c. Explain PacifiCorp’s plan, with a timeline, for gathering the information it needs to produce the analysis of its prevention and suppression resources in California.
- d. If PacifiCorp intends to “discuss with other utilities” by the end of 2028, when does PacifiCorp expect it will be able to produce the analysis of its prevention and suppression resources in California?

Q10. Regarding Terrain Score, Wind Score, and Percent of Overall Utility Risk:

- a. Provide the name, length (in circuit miles), Terrain Score, Wind Score, and percentage of overall utility risk, of each circuit in PacifiCorp’s service territory in the following format:

Circuit	Terrain Score	Wind Score	Percent of Overall Utility Risk	Length (circuit miles)

Q11. Regarding Line Rebuild, Covered Conductor Installation and Undergrounding:

On page 170 of its 2026-2028 Base WMP, PacifiCorp states that “under the line rebuild program, PacifiCorp is also considering undergrounding” and “the company evaluates the potential to convert overhead lines to underground lines for rebuild projects on a project-by-project basis.”

- a. With the understanding that undergrounding is performed on a project-by-project basis, has PacifiCorp completed a preliminary evaluation of probable undergrounding projects?
 - i. If so, provide the circuit name and circuit-length of the undergrounding work.
 - ii. Does PacifiCorp have undergrounding mileage targets for 2026, 2027 and 2028? If so, provide the target for each year.
- b. Provide how many miles of undergrounding of electric lines PacifiCorp has performed within its HFTD and HFRA, broken down by year, between 2022, 2023, and 2024.

Q12. Regarding Table 4-1 High-Level Service Territory Components:

- a. Provide the following service territory components broken down by HFTD Tier 2 or Tier 3, and Non-HFTD:

Characteristic	HFTD Tier 2	HFTD Tier 3	Non-HFTD	Total
Hardened overhead transmission lines (circuit miles)				
Hardened overhead distribution lines (circuit miles)				
Substations (#)				
Power generation facilities (#)				

Distribution transformers (#)				
Reclosers (#)				
Poles (#)				
Microgrids (#)				

Q13. Regarding Distribution and Transmission Pole Wraps:

On page 173 of its 2026-2028 Base WMP, PacifiCorp states that “depending on the pole configuration and location, the company may also install a fire mesh wrap around both transmission and distribution wooden poles in areas of heightened wildfire risk” and “pole wraps may also be applied on poles scoped for replacement with steel poles as an interim solution.”

- a. Provide how many distribution pole wraps PacifiCorp has installed within its HFTD and HFRA, broken down by year, between 2022, 2023, and 2024.
- b. Provide how many transmission pole wraps PacifiCorp has installed within its HFTD and HFRA, broken down by year, between 2022, 2023, and 2024.
- c. With the understanding that PacifiCorp’s pole wrap program is an interim solution for distribution and transmission hardening, can PacifiCorp provide targets for its GH-15 activity for 2026, 2027, and 2028?
 - i. If so, provide targets for distribution pole wraps and transmission pole wraps.

END OF REQUEST