



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: Tuesday, July 29, 2025

Response Due: Friday, August 1, 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-05

Subject(s):

- Q01. Regarding Inconsistent Circuit Mile Values for Off-Cycle (Patrol) Transmission Inspection Target and Audit
- Q02. Regarding Quality Control of Transmission Routine Vegetation Management
- Q03. Regarding Vegetation Management Quality Program Procedure
- Q04. Regarding Percent Risk Reduction

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)
 - b. Dakota Smith (Dakota.Smith@energysafety.ca.gov)
 - c. Steve Kerr (Steve.Kerr@energysafety.ca.gov)
 - d. Surya Keshav (Surya.Keshav@energysafety.ca.gov)
 - e. Eli Weissman (Eli.Weissman@energysafety.ca.gov)
 - f. Andie Biggs (Andie.Biggs@energysafety.ca.gov)

REQUEST

Q01. Regarding Inconsistent Circuit Mile Values for Off-Cycle (Patrol) Transmission Inspection Target and Audit:

On page 266 of its 2026-2028 Base WMP, PacifiCorp indicates that it targets 142 miles in 2028 for its “Off-Cycle (Patrol) Inspection – Transmission (FIT)” activity.¹ On page 309 of its 2026-2028 Base WMP, PacifiCorp indicates it will audit 417 miles of its “Off-cycle Transmission (Patrol).” For 2026 and 2027, the total number of target and audit miles are identical, and so it is unclear why the total number of target and audit miles are not identical in 2028.

- a. Explain why the number of miles for Off-Cycle Transmission (Patrol) is not the same in Tables 9-2 and 9-6 for 2028.

Q02. Regarding Quality Control of Transmission Routine Vegetation Management:

On page 281 of its 2026-2028 Base WMP, PacifiCorp states that it “has separated main grid (VM-02) transmission and local (VM-02) transmission into distinct initiatives due to the difference in frequency of inspections...” On page 266 of its 2026-2028 Base WMP PacifiCorp sets quarterly targets for both Routine (Detailed) Inspection – Local Transmission and Routine (Detailed) Inspection – Main Grid. However, in Table 9-6: Vegetation Management QA and QC Activity Targets, PacifiCorp does not provide targets for auditing local and main grid routine transmission inspection and/or pruning and removal work.

- a. Does PacifiCorp plan to audit routine transmission inspection and/or pruning and removal work?
 - i. If yes, provide all Table 9-6 information as it pertains to audit(s) of routine transmission inspection and/or pruning and removal work.
 - ii. If no, explain why and how PacifiCorp checks the quality of routine transmission inspection and/or pruning and removal work.

Q03. Regarding Vegetation Management Quality Program Procedure:

On page 311 of its 2026-2028 Base WMP, PacifiCorp indicates that it includes, “additional information” about its quality assurance and quality control initiative in its “Vegetation Management Quality Management Program Guidelines document dated 3/04/2025.”

- a. Provide the latest version of PacifiCorp’s Vegetation Management Quality Management Program Guidelines.

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>).

- b. Indicate the version or revision number and effective date of PacifiCorp's Vegetation Management Quality Management Program Guidelines.

Q04. Regarding Percent Risk Reduction:

On page 138 of its 2026-2028 Base WMP, PacifiCorp states that it "is developing a framework to quantify the estimated and observed or measured effectiveness of wildfire risk mitigation activities to incorporate into an analysis of achieved and forecasted risk reduction. The company expects to complete this work in 2025 for use beginning in 2026." PacifiCorp later states that, "Initially, this estimate of risk reduction will include only line rebuilds and system hardening through covered conductor, undergrounding, and related capital investments."

- a. Define what is meant by "estimated" for effectiveness in this case.
- b. Define what is meant by "observed" for effectiveness in this case.
- c. Define what is meant by "measured" for effectiveness in this case.
- d. Explain when PacifiCorp will be using estimated, observed, and/or measured effectiveness for each of the respective mitigation activities (e.g., covered conductor, undergrounding, PSPS, ESS/PEDS, etc.).
- e. Provide a detailed description of the work PacifiCorp has done as of the submittal of its 2026-2028 Base WMP to determine the effectiveness of its mitigation activities.
- f. When does PacifiCorp intend to develop effectiveness for mitigation activities that are not line rebuilds and system hardening?

END OF REQUEST