



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, August 1, 2025

**Response Due:** Wednesday, August 6, 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-06

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

- Q01. Regarding Microgrids
- Q02. Regarding Top Risk Circuits
- Q03. Regarding Hardening Plans
- Q04. Regarding Fire Incident Tracking

## 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))
  - c. Steve Kerr ([Steve.Kerr@energysafety.ca.gov](mailto:Steve.Kerr@energysafety.ca.gov))
  - d. Surya Keshav ([Surya.Keshav@energysafety.ca.gov](mailto:Surya.Keshav@energysafety.ca.gov))
  - e. Andie Biggs ([Andie.Biggs@energysafety.ca.gov](mailto:Andie.Biggs@energysafety.ca.gov))
  - f. Paul Ramstad ([Paul.Ramstad@energysafety.ca.gov](mailto:Paul.Ramstad@energysafety.ca.gov))
  - g. Francis Solis ([Francis.Solis@energysafety.ca.gov](mailto:Francis.Solis@energysafety.ca.gov))

## REQUEST

### Q01. Regarding Microgrids:

On page 179 of PacifiCorp’s 2026-2028 WMP, PacifiCorp states that it “performed feasibility studies for the implementation of utility interactive and islanded microgrid solutions at four remote sites serving critical radio communications infrastructure. The studies evaluated loading seasonality potential for onsite generation with photovoltaic and wind resources, storage and identified potential energy deficits requiring the use of propane, natural gas, or diesel generators.”<sup>1</sup>

- a. With the understanding that PacifiCorp is still evaluating the result of these studies, provide copies of the feasibility studies’ reports for these four remote sites. If reports are not available, provide detailed summaries of each of the feasibility studies including the methods used and conclusions drawn.

### Q02. Regarding Top Risk Circuits:

- a. From pages 153-158 of PacifiCorp’s 2026-2028 Base WMP, provide an updated version of Table PAC 6-1: Summary of Risk Reduction for Circuits With Maximum Fuel/Terrain Wildfire Risk Scores via Excel with the following additional columns:
  - i. Terrain Score
  - ii. Wind Score
  - iii. Wildfire Risk Score
  - iv. Circuit Length (circuit miles)
  - v. HFTD Designation (Tier 2, Tier 3, non-HFTD HFRA, non-HFRA)
  - vi. 2026 Covered Conductor Planned (circuit miles)
  - vii. 2027 Covered Conductor Planned (circuit miles)
  - viii. 2028 Covered Conductor Planned (circuit miles)
  - ix. 2026 Undergrounding Planned (circuit miles)
  - x. 2027 Undergrounding Planned (circuit miles)
  - xi. 2028 Undergrounding Planned (circuit miles)
- b. All of the circuits in Table PAC 6-1 show “No 2027 Activities” and “No 2028 Activities”.
  - i. Explain why these circuits currently have no planned mitigations.
  - ii. Provide a timeline for when PacifiCorp anticipates planning activities for 2027 and 2028
  - iii. Provide a timeline for when PacifiCorp anticipates having planned activities for 2027 and 2028.
- c. PacifiCorp’s response to OEIS-P-WMP 2025-PC-04 Q10 shows the same circuits with different terrain scores, wind scores, overall utility risk scores, percent of overall utility

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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>).

risk, and lengths than the circuits provided in Table 5-5: Summary of Top-Risk Circuits, Segments, or Spans (PacifiCorp 2026-2028 Base WMP, p. 103) and Table 6-1: Prioritized Areas in PacifiCorp's Service Territory Based on Overall Utility Risk (PacifiCorp 2026-2028 Base WMP, pp. 122-123).

- i. Explain the discrepancy between the tables and the data request response.
- d. Provide the summation for the total wildfire risk across PacifiCorp's service territory used to determine the percent of overall utility risk in Table 6-1: Prioritized Areas in PacifiCorp's Service Territory Based on Overall Utility Risk (PacifiCorp's 2026-2028 Base WMP, pp. 122-123).
- e. Provide the summation for the total wildfire risk for circuits in PacifiCorp's non-HFTD HFRA.

**Q03. Regarding Hardening Plans:**

- a. Provide a table via Excel for each grid hardening project PacifiCorp has planned for the 2026-2028 Base WMP:
  - i. Circuit ID
  - ii. Circuit Length (circuit miles)
  - iii. Wildfire Risk Score
  - iv. Terrain Score
  - v. Wind Score
  - vi. Max Terrain Score
  - vii. Max Wind Score
  - viii. Covered Conductor (circuit miles) Planned for 2026
  - ix. Covered Conductor (circuit miles) Planned for 2027
  - x. Covered Conductor (circuit miles) Planned for 2028
  - xi. Undergrounding (circuit miles) Planned for 2026
  - xii. Undergrounding (circuit miles) Planned for 2027
  - xiii. Undergrounding (circuit miles) Planned 2028
  - xiv. Covered Conductor/Undergrounding (circuit miles) Planned in HFTD
  - xv. Covered Conductor/Undergrounding (circuit miles) Planned in non-HFTD HFRA

**Q04. Regarding Fire Incident Tracking:**

- a. On page 64 of PacifiCorp's 2026-2028 Base WMP, PacifiCorp states that "Given the limited ignition history, there may be no discernable trends in the short term, but the company will monitor and continue assessing if there is a need." Describe how PacifiCorp will determine when there is sufficient data for measuring trends from the fire incident tracker, including PacifiCorp's timeline, or data needed, for determination.
- b. On page 67 of PacifiCorp's 2026-2028 Base WMP, PacifiCorp states that the "POI model is used in lieu of statistically significant wildfire incident data resulting from electric

utility assets” for determining ignition likelihood. However, in Table 5-4: Summary of Risk Models, PacifiCorp lists the fire incident database as a source of input for the contact from vegetation likelihoods (PacifiCorp Base 2026-2028 WMP, p. 96). Explain this discrepancy, including how the fire incident database is used as an input for these risk components.

- c. Explain how PacifiCorp is using the fire incident tracking database to inform lessons learned for future mitigation work (or how PacifiCorp will use the fire incident tracking database if it is not yet used to inform lessons learned for future mitigation work).

**END OF REQUEST**