



*Public Advocates Office*  
*California Public Utilities Commission*

505 Van Ness Avenue  
San Francisco, CA 94102  
Phone: (415) 703-2544  
Fax: (415) 703-2057

<http://publicadvocates.cpuc.ca.gov>

**PUBLIC ADVOCATES OFFICE DATA REQUEST**

R. 18-10-007: Wildfire Mitigation Plan Rulemaking

**No. CalAdvocates-PacifiCorp-2020WMP-01**

Date: February 19, 2020

Response Requested: **February 24, 2020**

To: **Betsy Watkins**  
PacifiCorp

Email: [Betsy.Watkins@PacifiCorp.com](mailto:Betsy.Watkins@PacifiCorp.com)

**Jessica Ralston**  
Legal  
PacifiCorp

Email: [Jessica.Ralston@PacifiCorp.com](mailto:Jessica.Ralston@PacifiCorp.com)

From: **Matthew Karle**  
Senior Analyst  
Public Advocates Office

Phone: (415) 703-1850  
Email: [Matthew.Karle@cpuc.ca.gov](mailto:Matthew.Karle@cpuc.ca.gov)

**Matthew Taul**  
Utilities Engineer  
Public Advocates Office

Phone: (415) 703-3308  
Email: [Matthew.Taul@cpuc.ca.gov](mailto:Matthew.Taul@cpuc.ca.gov)

**Charlyn Hook**  
Attorney  
Public Advocates Office

Phone: (415) 703-3050  
Email: [Charlyn.Hook@cpuc.ca.gov](mailto:Charlyn.Hook@cpuc.ca.gov)

**Diana Lee**  
Attorney  
Public Advocates Office

Phone: (415) 703-4342  
Email: [Diana.Lee@cpuc.ca.gov](mailto:Diana.Lee@cpuc.ca.gov)



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**INSTRUCTIONS**

You are instructed to answer the following Data Requests in the above-captioned proceeding, with written, verified responses per Public Utilities Code §§ 309.5 and 314, and Rules 1.1 and 10.1 of the California Public Utilities Commission's Rules of Practice and Procedure. Restate the text of each request prior to providing the response. For any questions, email the Public Advocates Office contact(s) above with a copy to the Public Advocates Office attorney.

Each Data Request is continuing in nature. Provide your response as it becomes available, but no later than the due date noted above. If you are unable to provide a response by this date, notify the Public Advocates Office as soon as possible, with a written explanation as to why the response date cannot be met and a best estimate of when the information can be provided. If you acquire additional information after providing an answer to any request, you must supplement your response following the receipt of such additional information.

Identify the person providing the answer to each data request and his/her contact information. Responses should be provided both in the original electronic format, if available, and in hard copy. (If available in Word format, send the Word document and do not send the information as a PDF file.) All electronic documents submitted in response to this data request should be in readable, downloadable, printable, and searchable formats, unless use of such formats is infeasible. Each page should be numbered. If any of your answers refer to or reflect calculations, provide a copy of the supporting electronic files that were used to derive such calculations, such as Excel-compatible spreadsheets or computer programs, with data and formulas intact and functioning. Documents produced in response to the data requests should be Bates-numbered, and indexed if voluminous. Responses to data requests that refer to or incorporate documents should identify the particular documents referenced by Bates-numbers or Bates-range.

If a request, definition, or an instruction, is unclear, notify the Public Advocates Office as soon as possible. In any event, answer the request to the fullest extent possible, specifying the reason for your inability to answer the remaining portion of the Data Request.

## DEFINITIONS

Unless the request indicates otherwise, the following definitions are applicable in providing the requested information.

1. The terms “document,” “documents,” or “documentary material” include, without limitation, the following items, whether in electronic form, printed, recorded, or written or reproduced by hand: reports, studies, statistics, projections, forecasts, decisions, and orders, intra-office and interoffice communications, correspondence, memoranda, financial data, summaries or records of conversations or interviews, statements, returns, diaries, calendars, work papers, graphs, notebooks, notes, charts, computations, plans, drawings, sketches, computer printouts, summaries of records of meetings or conferences, summaries or reports of investigations or negotiations, opinions or reports of consultants, photographs, bulletins, records or representations or publications of any kind (including microfilm, videotape, and records however produced or reproduced), electronic or mechanical or electrical records of any kind (including, without limitation, tapes, tape cassettes, discs, emails, and records) other data compilations (including without limitation, input/output files, source codes, object codes, program documentation, computer programs, computer printouts, cards, tapes, discs and recordings used in automated data processing, together with the programming instructions and other material necessary to translate, understand, or use the same), and other documents or tangible things of whatever description which constitute or contain information within the scope of these data requests.
2. “Relating to” means concerning, addressing, referring, discussing, commenting upon, analyzing, mentioning or involving in any way.
3. “Identify”:
  - a. When used in reference to a person includes stating his or her full name, his or her most recent known business address and telephone number, and his or her present title or position;
  - b. When used in reference to documents includes stating the nature of the document (e.g., letter, memorandum), the date (if any), the title of the document, the identity of the author and/or the document, the location of the document, the identity of the person having possession, control or custody of the document, and the general subject matter of the document.
4. “CPUC” or “Commission” as used herein refers to the California Public Utilities Commission.
5. “PacifiCorp” as used herein refers to PacifiCorp and/or Pacific Power its affiliates.

## DATA REQUESTS

### Question 1

Please clarify how PacifiCorp uses the terms “ignition” and “near miss” in PacifiCorp’s 2020 Wildfire Mitigation Plan (and all associated data and metrics submitted to the Commission’s Wildfire Safety Division).

- a. Does PacifiCorp use the term “ignition” as synonymous with “CPUC-Reportable Event”?<sup>1</sup>
- b. If the answers to question 1a is no, please provide PacifiCorp’s definition of “ignition” as used in PacifiCorp’s 2020 Wildfire Mitigation Plan (and all associated data and metrics submitted to the Commission’s Wildfire Safety Division).

### Question 2

Please clarify how PacifiCorp uses the term “near miss” in PacifiCorp’s 2020 Wildfire Mitigation Plan (and all associated data and metrics submitted to the Commission’s Wildfire Safety Division),

- a) Does PacifiCorp use “near miss” as defined in the December 16, 2019 WMP Guidelines?<sup>2</sup>
- b) If the answer to question 2a is yes, please explain how PacifiCorp determines whether an event entails “significant probability of ignition.”
- c) If the answer to question 2a is no, please provide PacifiCorp’s definition of “near miss” as used in PacifiCorp’s 2020 Wildfire Mitigation Plan (and all associated data and metrics submitted to the Commission’s Wildfire Safety Division).

### Question 2

Please explain how PacifiCorp distinguishes between an ignition and a Near Miss.

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<sup>1</sup> D. 14-02-015, *Decision Adopting Regulations to Reduce the Fire Hazards Associated with Overhead Electric Utility Facilities and Aerial Communications Facilities*, issued February 5, 2014 in R.08-11-005, p. C-3:

“CPUC-Reportable Event” means “any event where utility facilities are associated with the following conditions: (a) A self-propagating fire of material other than electrical and/or communication facilities, and (b) The resulting fire traveled greater than one linear meter from the ignition point, and (c) The utility has knowledge that the fire occurred. Ignition Point is the location, excluding utilities facilities, where a rapid, exothermic reaction was initiated that propagated and caused the material involved to undergo change, producing temperatures greatly in excess of ambient temperature.”

<sup>2</sup> *Administrative Law Judge’s Ruling on Wildfire Mitigation Plan Templates and Related Material and Allowing Comment*, R.18-10-007 December 16, 2019, Attachment 1, WMP Guidelines, (December 16, 2019 WMP Guidelines) p. 11.

“Near miss” means “An event with significant probability of ignition, including wires down, contacts with objects, line slap, events with evidence of significant heat generation, and other events that cause sparking or have the potential to cause ignition.”

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Please send your response to the Originator, and a copy of your response to Project Coordinator and e-copies to the following Public Advocates Office representatives:

Henry.burton@cpuc.ca.gov

Please provide the above information as it becomes available but no later than the due date identified above. If you are unable to provide the information by this date, please notify the Originator **at least** 3 days before the data request is due and provide your best estimate of when the information can be provided. Please identify the person who provides the response and his/her phone number and email address.

**END OF REQUEST**