



Public Advocates Office Data Request

No. CalAdvocates-PacifiCorp-2023WMP-16
Proceeding: 2023-2025 Wildfire Mitigation Plans

Date of issuance: Thursday, June 15, 2023

Responses due: Tuesday, June 20, 2023

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INSTRUCTIONS

You are instructed to answer the following Data Request in the aforementioned proceeding, with written, accurate responses pursuant to Public Utilities Code §§ 309.5(e) and 314, Rule 1.1 of the California Public Utilities Commission's (CPUC) Rules of Practice and Procedure, and the Office of Energy Infrastructure Safety's (OEIS) guidelines for Wildfire Mitigation Plan (WMP) discovery.¹

Restate the text of each data request question prior to providing the response. Provide the name and title of the responding individual (i.e., the person responsible for the content of your answer) for each data request question. If the responding individual is not your employee, please provide their name, title, and employer, as well as the name and title of your employee who is directly responsible for the work of the responding individual.

Please send your responses and inquiries to the originators of this data request (that is, the Public Advocates Office employees and attorneys listed on the cover page), with copies to the following representatives of the Public Advocates Office:

1. CalAdvocates.WildfireDiscovery@cpuc.ca.gov
2. Henry.Burton@cpuc.ca.gov
3. Joseph.Lam@cpuc.ca.gov

Requests for Clarification: If a request, definition, or an instruction, is unclear, please notify the originators in writing as soon as feasible, including a specific description of what you find unclear and why. If possible, please provide a proposal for resolving the issue. In any event, unless directed otherwise by the originators, answer the request to the fullest extent possible, explain why you are unable to answer in full, and describe the limitations of your response.

Incomplete responses: If you are unable to answer a question completely, accurately, and with the specificity requested, notify the originators as soon as possible. If possible, please provide a proposal for resolving the issue. In your written response to the question, explain why you are unable to answer in full and describe the limitations of your response.

Timing of responses: Please respond to each question as soon as your complete response to that specific question is available, and no later than the due date listed on the cover sheet.

Deadline extension requests: If you are unable to provide a complete response to each question by the due date noted on the cover page, contact the originators in writing to request a deadline extension. In your deadline extension request, please (1) specify the questions affected by the delay, (2) propose an alternative response date and (3) provide a written explanation as to why the deadline cannot be met. Please submit your deadline extension request as soon as feasible. To

¹ Office of Energy Infrastructure Safety, *Final 2023-2025 Wildfire Mitigation Plan Process and Evaluation Guidelines*, December 6, 2022, Section 8 (pp. 13-17).

comply with OEIS discovery guidelines, you must submit an extension request to the originators at least 2 business days prior to the due date.²

Objections: If you object to any portion of this Data Request, please submit your objections, including the specific legal basis for each objection, to the originators as soon as possible.

Response format: Responses should be provided in the original electronic format if available, and otherwise, in hard copy. (If available in Word or Excel format, send the Word or Excel document not 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 rely on, refer to or reflect calculations that are not shown therein, provide a copy of the supporting electronic files that were used to derive such calculations, such as Excel spreadsheets or computer programs, with data and formulas intact and functioning.
- Voluminous documents produced in response to the data request should be Bates-numbered and indexed.
- Responses to the data request that refer to or incorporate documents should clearly identify the particular documents referenced, including the title and page number or, if available, Bates-numbers or Bates-range.

Other questions: For any questions, email the originators.

DEFINITIONS

- A. As used herein, the terms “you,” “your(s),” “Company,” and “PacifiCorp” mean PacifiCorp d/b/a Pacific Power and any and all of its respective present and former employees, agents, consultants, attorneys, and officials, and any and all other persons acting on its behalf.
- B. The terms “and” and “or” shall be construed either disjunctively or conjunctively whenever appropriate in order to bring within the scope of this Data Request any information or documents which might otherwise be considered to be beyond their scope.
- C. Date ranges shall be construed to include the beginning and end dates named. For example, the phrases “from January 1 to January 31,” “January 1-31,” “January 1 to 31,” and “January 1 through January 31” should be understood to include both the 1st of January and the 31st of January. Likewise, phrases such as “since January 1” and “from January 1 to the present”

² Deadline extension requests are due to OEIS at least one business day before the deadline, prior to which the electrical corporation “must first make a good-faith effort to ask the stakeholder making the request to agree to the extension.” Office of Energy Infrastructure Safety, *Final 2023-2025 Wildfire Mitigation Plan Process and Evaluation Guidelines*, December 6, 2022, p. 15.

should be understood to include January 1st, and phrases such as “until January 31,” “through January 31,” and “up to January 31” should also be understood to include the 31st.

- D. The singular form of a word shall be interpreted as plural, and the plural form of a word shall be interpreted as singular whenever appropriate in order to bring within the scope of this Data Request any information or documents which might otherwise be considered to be beyond their scope.
- E. The term “communications” includes all verbal and written communications of every kind, including but not limited to telephone calls, conferences, notes, correspondence, and all memoranda concerning the requested communications. Where communications are not in writing, provide copies of all memoranda and documents made relating to the requested communication and describe in full the substance of the communication to the extent that the substance is not reflected in the memoranda and documents provided.
- F. 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, 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 or 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, and 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 this Data Request.
- G. “Relate to,” “concern,” and similar terms and phrases shall mean to consist of, refer to, reflect, comprise, discuss, underlie, comment upon, form the basis for, analyze, mention, or be connected with, in any way, the subject of this Data Request.
- H. “Identify”:
 - i. When used in reference to a Company employee, “identify” includes stating their full name and title.

- ii. When used in reference to a consultant or contractor for the Company, “identify” includes stating the person’s name, title, and employer, and the name and title of the Company employee who is directly responsible for the work of the consultant.
 - iii. When used in reference to a person who is not a current Company employee, consultant or contractor, “identify” includes stating the person’s name; most recent title and supervisor at the Company; and most recent known employer, title/position, and business address.
 - iv. When used in reference to documents, “identify” includes stating the nature of the document (e.g., letter, memorandum, study), the date (if any), the title of the document, the identity of the author, and the general subject matter of the document. For documents not publicly available, please also provide the location of the document, and identify the person having possession, control or custody of the document.
- I. When requested to “state the basis” for any statement (i.e., any analysis, workpaper, study, proposal, assertion, assumption, description, quantification, or conclusion), please describe every fact, statistic, inference, supposition, estimate, consideration, conclusion, study, report, and analysis available to you which you believe to support the statement, or which you contend to be evidence of the truth or accuracy thereof.
 - J. “CPUC” and “Commission” mean the California Public Utilities Commission.
 - K. “Cal Advocates” means the Public Advocates Office at the California Public Utilities Commission.
 - L. “Energy Safety” and “OEIS” mean the California Office of Energy Infrastructure Safety.
 - M. “WMP” means wildfire mitigation plan. Unless otherwise specified, this refers to the 2023-2025 WMP.
 - N. “GIS” means Geographic Information System.
 - O. “HFTD” means High Fire-Threat District as defined in CPUC General Order 95, Section II, item 21.2(D), and CPUC Decision 17.01.009 (pp. 39-40; Ordering Paragraphs 1 and 1(mm)) (“Fire Map 2”).³ This term encompasses three areas:
 - a. Tree Mortality High Hazard Zone (HHZ) 1 on the U.S. Forest Service - CAL FIRE joint map of Tree Mortality HHZs (see D.17-01-009, pp. 39-40);
 - b. HFTD Tier 2, the elevated wildfire risk area included in Shape C map of the CPUC Fire-Threat Map (“Fire Map 2”) that was adopted in D.17.01.009, pp. 39-40; and

³ As modified by Commission Decision 20-12-030.

- c. HFTD Tier 3, the extreme wildfire risk area included in Shape C map of the CPUC Fire-Threat Map (“Fire Map 2”) that was adopted in D.17.01.009, pp. 39-40.
- P. “Non-HFTD” means areas that are not designated as HFTD according to the definition above.
- Q. “Tier 2” means HFTD Tier 2, as defined in D.17.01.009, pp. 25, 39-40 and Ordering Paragraph 1(v).
- R. “Tier 3” means HFTD Tier 3, as defined in D.17.01.009, pp. 25, 39-40 and Ordering Paragraph 1(v).
- S. “Other HFTD” means areas *outside of Tier 2 and Tier 3* that are designated as HFTD because they are included in Tree Mortality High Hazard Zone 1.

DATA REQUEST

The following questions pertain to PacifiCorp’s response to CalAdvocates-PacifiCorp-2023WMP-14, question 1 and the file it submitted on June 12, 2023 (Excel spreadsheet named “Attach CalAdvocates 14.1.xlsx”).

Question 1

In its response to question 1 of CalAdvocates-PacifiCorp-2023WMP-14, PacifiCorp states:

the Company designates all Level 1 priority work orders as A conditions. The data in the attachment includes all conditions designated as an A condition in 2020 through 2022 per Company Procedure 069. The Company’s internal Policy 192 requires A conditions that are imminent dangers to be corrected immediately. For any A conditions that are not imminent dangers, the policy allows for up to 30 days for corrective action.

- a) Please provide a copy of Company Procedure 069.
- b) Please provide a copy of Company Procedure 192.
- c) Please describe how PacifiCorp determines whether an “A condition” is or is not an imminent danger.
- d) Please state the basis for classifying an A condition as imminent.
- e) Please state the basis for classifying an A condition as non-imminent.

Question 2

- a) For asset work orders that are designated as Level 1 priority but non-imminent dangers, does PacifiCorp take any interim measures or actions (temporary repairs, increased inspections, or patrols, etc.) to ensure that the problem is made safe until the corrective action is completed?

- b) If the answer to (a) is “yes,” please describe the types of interim measures or actions that PacifiCorp takes.
- c) If the answer to (a) is “no,” please explain why not.

Question 3

This question pertains to the Excel spreadsheet named “Attach CalAdvocates 14.1.xlsx.” In this spreadsheet, 41 asset work orders have damage codes listed as “CONDUCTOR DAMAGED/FRAYED,” including the following 3 examples:

- (1) Work order ID 493720784-86299-DTLSB-11_08_2021-CONDFRAY-1^06148004.0259004, created on 11/8/2021.
- (2) Work order ID 474471051-73741-DETAIL-09_21_2020-CONDFRAY-1^06147001.0081701, created on 9/21/2020.
- (3) Work order ID 78988906-65431-DTLSB-03_17_2022-CONDFRAY-1^06146005.0230801, created on 3/17/2022.

For each of the work orders listed above, please answer the following questions:

- a) Please explain why the work order was not classified as an imminent threat.
- b) Why did PacifiCorp deem it prudent to set a deadline of approximately 30 days to remediate the condition?
- c) Did PacifiCorp take any interim remedial actions to make the condition safe before the work order could be completed?
- d) If the answer to part (c) is yes, please describe the interim remedial actions taken.
- e) If the answer to part (c) is no, why not?

Question 4

This question pertains to the Excel spreadsheet named “Attach CalAdvocates 14.1.xlsx.” In this spreadsheet, 13 asset work orders have damage codes listed as “DISTRIBUTION - TREE CONTACTING PRIMARY” or “TREE CONTACTING OPEN SECONDARY,” including the following 3 examples:

- (1) Work order ID 574335972-98671-DTLTRT-06_22_2021-TREDIST-1^668041/004/030, created on 6/22/2021.
- (2) Work order ID 739842814-48640-DETAIL-06_02_2020-TREDIST-1^07218001.0262905, created on 6/2/2020.

(3) Work order ID 515963558-30409-DETAIL-02_01_2022-TRESCBRN-1^06147005.0265404, created on 2/1/2022.

For each of the work orders listed above, please answer the following questions:

- a) Please explain why the work order was not classified as an imminent threat.
- b) Why did PacifiCorp deem it prudent to set a deadline of approximately 30 days to remediate the condition?
- c) Did PacifiCorp take any interim remedial actions to make the condition safe before the work order could be completed?
- d) If the answer to part (c) is yes, please describe the interim remedial actions taken.
- e) If the answer to part (c) is no, why not?

Question 5

This question pertains to the Excel spreadsheet named “Attach CalAdvocates 14.1.xlsx.” In this spreadsheet, 107 asset work orders have damage codes listed as “POLE-DECAY/REJECT/REPLACE” or “POLE-DAMAGE/REJECT/REPLACE,” including the following 3 examples:

- (1) Work order ID 616243056-22831-ADMIN-01_27_2020-POLEREPL-1^668038/001/055, created on 1/27/2020.
- (2) Work order ID 983435913-45949-ADMIN-05_03_2021-POLEREPL-1^07114001.0276306, created on 5/3/2021.
- (3) Work order ID 169522597-70849-ADMIN-01_02_2020-POLEDERP-1^07114001.0341100, created on 1/2/2020.

For each of the work orders listed above, please answer the following questions:

- a) Please explain why the work order was not classified as an imminent threat.
- b) Why did PacifiCorp deem it prudent to set a deadline of approximately 30 days to remediate the condition?
- c) Did PacifiCorp take any interim remedial actions to make the condition safe before the work order could be completed?
- d) If the answer to part (c) is yes, please describe the interim remedial actions taken.
- e) If the answer to part (c) is no, why not?

END OF REQUEST