



Public Advocates Office Data Request

No. CalAdvocates-PacifiCorp-2025WMP-03
Proceeding: 2023-2025 Wildfire Mitigation Plans

Date of issuance: Thursday, July 18, 2024

Responses due: Tuesday, July 23, 2024

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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 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. Matthew.Karle@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 Office of Energy Infrastructure Safety (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. *At latest*, submit your objections and legal bases by the response deadline on the cover sheet.

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 “Pacific Power” mean PacifiCorp 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

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.

of January. Likewise, phrases such as “since January 1” and “from January 1 to the present” 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.
 - 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. “Circuit segment,” “circuit-segment,” or “segment” means the shortest stretch of a circuit that can be electrically isolated – that is, a portion of a circuit with a protection device (such as a recloser) at either end. Circuit-segments are also sometimes referred to as “circuit protection zones,” “zones of protection” or “isolatable circuit-segments.”
 - P. “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);

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

- b. HFTD Tier 2, the elevated wildfire risk area included in the CPUC Fire-Threat Map (“Fire Map 2”) that was adopted in D.17.01.009, pp. 39-40; and
 - c. HFTD Tier 3, the extreme wildfire risk area included in the CPUC Fire-Threat Map (“Fire Map 2”) that was adopted in D.17.01.009, pp. 39-40.
- Q. “Non-HFTD” means areas that are not designated as HFTD according to the definition above.
- R. “Tier 2” means HFTD Tier 2, as defined in D.17.01.009, pp. 25, 39-40 and Ordering Paragraph 1(v).
- S. “Tier 3” means HFTD Tier 3, as defined in D.17.01.009, pp. 25, 39-40 and Ordering Paragraph 1(v).
- T. “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.
- U. “PSPS” means Public Safety Power Shutoff and are planned outages that are intended to prevent wildfires.
- V. “NERC” refers to the North American Electric Reliability Corporation.
- W. “Fast-trip” refers to PacifiCorp’s Elevated Fire Risk (EFR) settings for protective devices on PacifiCorp’s circuits.
- X. “Protective device” refers to a device that functions to de-energize a powerline in the case of an abnormal condition; it includes relays, circuit-breakers, and current/voltage transformers.

DATA REQUEST

The following questions relate to section 8.2, Vegetation Management and Inspections, of PacifiCorp’s 2025 WMP Update.

Question 1

Table 8-13, Vegetation Management Implementation Objectives (3-year plan), indicates a “Deferred” status for the first two objectives listed. Please clarify the meaning of “Deferred” in the context of this WMP.

Question 2

Table 8-16, Vegetation Inspections and QA/QC Targets by Year, contains uneven targets for 2023-2025. Please explain and justify the following:

- a) Detailed Inspection – Transmission targets increase from 264 line miles in 2023 to 602 line miles in 2024 (a 128% increase year over year) and go back down to 270 line miles in 2025.
- b) Patrol Inspection – Distribution targets indicate no progress between the end of Q3 and end of year targets for 2023 and 2024.
- c) Patrol Inspection – Distribution targets decreased from 1,027 circuit miles in 2023 to 865 circuit miles in 2024. This is a 162-mile (15%) decrease.
- d) Patrol Inspection – Transmission targets do not indicate any progress between end of Q3 and end of year targets for 2023 and 2025.
- e) Patrol Inspection – Transmission targets do not indicate any progress for 2024 quarterly targets.
- f) Patrol Inspection – Transmission targets for 2024 decrease to 99 line miles from the 329 line miles targeted in 2023. This is a 230-mile (69.9%) difference.

Question 3

PacifiCorp did not provide any data in relation to performance metrics for table 8-17 in this WMP Update. According to PacifiCorp’s response to question 3 of a previous data request “CalAdvocates-PacifiCorp-2023WMP-10”, this was due to miscommunication and a lapse in the data gathering process.

- a) Please provide an updated table 8-17.
- b) Provide an update on the efforts PacifiCorp has taken to develop control processes to ensure this data is captured and consistent in the future.

Question 4

For Table 8-19, Vegetation Management QA/QC Program:

- a) Please justify why a 10% sample size for Pole Clearing is a sufficient sample size for the purpose of QA/QC.

- b) What is PacifiCorp’s procedural response to programs that do not meet the yearly target pass rate?

Question 5

PacifiCorp did not provide any data in relation to Table 8-20, Number of Past Due Vegetation Management Work Orders Categorized by Age.

- a) How does PacifiCorp determine priority of Vegetation Management Work Orders without established, specific due dates for each condition?
- b) Please provide a status update on the development of specific due dates for each condition found in vegetation inspections.
- c) Please provide an estimated timeline of when PacifiCorp intends to complete and implement the specific past-due dates.

Question 6

Please provide PacifiCorp’s Vegetation Management and Inspection manuals.

The following questions relate to PacifiCorp’s Asset Management and Inspections.

Question 7

Please provide the most recent version of PacifiCorp’s Procedure 069 and state the date when it was most recently revised or updated.

Question 8

In response to Cal Advocates’ data request CalAdvocates-PacifiCorp-2023WMP-16, PacifiCorp provided Policy 192 R7. If the document has been updated since then, please provide an updated version of Procedure 192.

Question 9

PacifiCorp states the following in its 2025 WMP update on p. 180:

“In response to PC 23-12, in 2024, to update the imminent threat condition code, procedures were developed to be able to capture the imminent threat conditions at the time of identification along with entering the data into the official system of record, Facility Point Inspection (FPI). All policies and procedures have been updated and training materials are currently being updated to reflect new policies. Starting in 2025, all level 1 conditions will be tracked separately from priority A conditions.”

- a) Please provide the procedures PacifiCorp has developed to capture the imminent threat conditions.
- b) Please explain why level 1 conditions will be tracked separately from priority A conditions.
- c) Please specify how PacifiCorp will differentiate A priority conditions that are “imminent” from “non-imminent” threat conditions.

Question 10

PacifiCorp states in its 2025 WMP update on p. 180 that it experiences delays in remediation due to: access, materials, permitting, and resource constraints.

- a) What specific actions and procedural changes has PacifiCorp implemented to mitigate the delays listed above?
- b) For each action or procedural change, how has PacifiCorp measured and validated the resulting impact (i.e. the action reduced *type of delay* by *n* days)?

Question 11

- a) Between 2020 to 2023, did PacifiCorp conduct any temporary corrective actions or interim measures to decrease the severity of imminent threat conditions?
- b) If yes to the above question, please provide a list of the individual asset maintenance tags and the corrective actions taken to decrease the imminent threat condition for 2020 to 2023.

Question 12

For Table 8-7, Grid Design and Maintenance QA/QC Program:

- a) Please explain why a 5% Contractor sample size for Detailed Inspections is a sufficient sample size for the purpose of QA/QC.
- b) Please explain why a 3% Company sample size for Detailed Inspections is a sufficient sample size for the purpose of QA/QC.
- c) Please clarify/justify why a 5% Contractor sample size for Intrusive Inspections is a sufficient sample size for the purpose of QA/QC.
- d) Please clarify/justify why a 3% Company sample size for Intrusive Inspections is a sufficient sample size for the purpose of QA/QC.
- e) What is PacifiCorp’s procedural response to programs that do not meet the yearly target pass rate?

END OF REQUEST