



**TRANSMITTED VIA ELECTRONIC MAIL**

**DATA REQUEST**

**Request Date:** August 30, 2024

**Response Due:** September 25, 2024

**To:**  
PacifiCorp  
[Allen.berreth@pacificorp.com](mailto:Allen.berreth@pacificorp.com)

**Originator:** Marisa Salazar, Environmental Scientist  
[marisa.salazar@energysafety.ca.gov](mailto:marisa.salazar@energysafety.ca.gov)

**Data Request Number:** Energy Safety-DR-261

**Subject:** Pursuant to the Office of Energy Infrastructure Safety’s (Energy Safety) audit of PacifiCorp’s substantial completion of its 2023 WMP vegetation management initiatives, as required by Public Utilities Code Section 8386.3(c)(5), Energy Safety requests the documents and information outlined in this data request. The specific initiatives and associated request numbers are listed below in Table 1:

<b>2023 Initiative or Subsection</b>	<b>Associated Request #</b>
<b>8.2 Vegetation Management and Inspections</b> <ul style="list-style-type: none"><li>8.2.1.2 Targets</li></ul>	1-7
<b>8.2.2 Vegetation Management Inspections</b> <ul style="list-style-type: none"><li>8.2.2.1 Detailed inspections and management practices for vegetation clearances around distribution electrical lines and equipment</li><li>8.2.2.2 Detailed inspections and management practices for vegetation clearances around transmission electrical lines and equipment</li><li>8.2.2.3 Patrol inspections of vegetation around distribution electric lines and equipment</li><li>8.2.2.4 Patrol inspections of vegetation around transmission electric lines and equipment</li></ul>	8-16
<b>8.2.3 Vegetation and Fuels Management</b> <ul style="list-style-type: none"><li>8.2.3.1.1 Wood and Slash Management</li></ul>	17-30



**OFFICE OF ENERGY INFRASTRUCTURE SAFETY**

715 P Street, 20th Floor | Sacramento, CA 95814  
916 902-6000 | [www.energysafety.ca.gov](http://www.energysafety.ca.gov)

Caroline Thomas Jacobs, Director

<ul style="list-style-type: none"><li>• <b>8.2.3.1.2 Pole Clearing</b></li><li>• <b>8.2.3.2 Clearance</b></li><li>• <b>8.2.3.3 Fall-In Mitigation</b></li><li>• <b>8.2.3.4 Substation Defensible Space</b></li><li>• <b>8.2.3.5 High-Risk Species</b></li><li>• <b>8.2.3.6 Fire-Resilient Right-of-Ways</b></li><li>• <b>8.2.3.7 Emergency Response of Vegetation Management</b></li></ul>	
<b>8.2.4 Vegetation Management Enterprise System</b>	31
<b>8.2.5 Quality Assurance and Quality Control</b>	32-33
<b>8.2.6 Open Work Orders</b>	34
<b>8.2.7 Workforce Planning</b>	35



**OFFICE OF ENERGY INFRASTRUCTURE SAFETY**

715 P Street, 20th Floor | Sacramento, CA 95814  
916 902-6000 | [www.energysafety.ca.gov](http://www.energysafety.ca.gov)

Caroline Thomas Jacobs, Director

**INSTRUCTIONS**

- a. 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 (30 *calendar* days).
- b. Responses and documents may be produced and served electronically, but they shall be fully machine-readable and searchable.
  - i. Responses must include documentation that supports the completion of work described in PacifiCorp’s 2023-2025 WMP. Statements without supporting documentation will not be accepted.
- c. Per California Code of Regulations, title 14, section 29200, every confidential file provided must be accompanied by a redacted and unredacted version of the same file.
- d. 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.
  - i. Lack of clarity on meaning or scope of requests, without prior request for clarification from the “Originator,” will not be a permissible reason for incomplete responses and will be regarded as non-compliance with the request.
- e. Identify the personnel (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, business address, and title of each employee, consultant, or agent who provided such information.
- f. If you do not know the exact answer to any of the requests below, please so indicate and provide your best estimate.
- g. Provide data in its original format (i.e., PDF, Excel, GIS shapefile, etc.), unless otherwise specified in the request.
- h. Send your response to Marisa Salazar ([marisa.salazar@energysafety.ca.gov](mailto:marisa.salazar@energysafety.ca.gov)), and include a copy to:
  - i. [environmentalscience@energysafety.ca.gov](mailto:environmentalscience@energysafety.ca.gov)



**OFFICE OF ENERGY INFRASTRUCTURE SAFETY**

715 P Street, 20th Floor | Sacramento, CA 95814  
916 902-6000 | [www.energysafety.ca.gov](http://www.energysafety.ca.gov)

Caroline Thomas Jacobs, Director

ii. [Sheryl.Bilbrey@energysafety.ca.gov](mailto:Sheryl.Bilbrey@energysafety.ca.gov)

**REQUEST**

**8.2.1.2 Targets-** In its 2023-2025 WMP, PacifiCorp describes initiative activity, “Fuels management - Pole clearing beyond PRC 4292” to have a target of “3126 poles brushed in LRA HFTD areas” in 2023.<sup>1</sup> Regarding this target, provide the following:

1. Excel file exported from PacifiCorp’s vegetation management database of the total number of poles brushed in LRA HFTD areas beyond PRC 4292 in 2023. For each pole include pole IDs, HFTD designation, LRA designation, PRC 4292 exemption status, the date each pole was inspected, any work prescribed to each pole during the inspection, and work completion dates for any prescribed work.

**8.2.1.2 Targets -** In its 2023-2025 WMP, PacifiCorp describes initiative activity, “Detailed Inspection – Distribution” to have a target of 450 circuit miles inspected at the end of Q2, 700 circuit miles inspected at the end of Q3, and 829 miles inspected at the end of the year in 2023.<sup>2</sup> Regarding these targets, provide the following:

2. Inspection records, project closeout documentation, and/or field verification showing PacifiCorp inspected 829 circuit miles in 2023 for detailed inspections - distribution. Include the dates of inspection completion.

**8.2.1.2 Targets -** In its 2023-2025 WMP, PacifiCorp describes initiative activity, “Detailed Inspection – Transmission” to have a target of 158 circuit miles inspected at the end of Q2, 211 circuit miles inspected at the end of Q3, and 264 miles inspected at the end of the year in 2023.<sup>3</sup> Regarding these targets, provide the following:

3. Inspection records, project closeout documentation, and/or field verification showing PacifiCorp inspected 264-line miles in 2023 for detailed inspection - transmission. Include the dates of inspection completion.

---

<sup>1</sup> [PacifiCorp’s 2023-2025 WMP](#) (Rev. #2, Feb. 22, 2024), p. 185  
(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56336&shareable=true>, accessed August 23, 2024).

<sup>2</sup> [PacifiCorp’s 2023-2025 WMP](#) (Rev. #2, Feb. 22, 2024), p. 186  
(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56336&shareable=true>, accessed August 23, 2024).

<sup>3</sup> [PacifiCorp’s 2023-2025 WMP](#) (Rev. #2, Feb. 22, 2024), p. 186  
(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56336&shareable=true>, accessed August 23, 2024).



**8.2.1.2 Targets** - In its 2023-2025 WMP, PacifiCorp describes initiative activity, “Patrol Inspection – Distribution” to have a target of 820 circuit miles inspected at the end of Q2, and 1,027 circuit miles inspected at the end of Q3 and at the end of the year in 2023.<sup>4</sup> Regarding these targets, provide the following:

4. Inspection records, project closeout documentation, and/or field verification showing PacifiCorp inspected 1,027 circuit miles in 2023 for patrol inspection - distribution. Include the dates of inspection completion.

**8.2.1.2 Targets** - In its 2023-2025 WMP, PacifiCorp describes initiative activity, “Patrol Inspection – Transmission” to have a target of 296 circuit miles inspected at the end of Q2, and 329 circuit miles inspected at the end of Q3 and at the end of the year in 2023.<sup>5</sup> Regarding these targets, provide the following:

5. Supporting documentation such as inspection records, project closeout documentation, and/or field verification showing PC inspected 329 line miles in 2023 for patrol inspection - transmission. Please include the dates of inspection completion.

**8.2.1.2 Targets** - In its 2023-2025 WMP, PacifiCorp describes initiative activity, “QA/QC Post-Audits Distribution (Patrol)” to have a target of 635 circuit miles inspected at the end of Q2, and 1,027 circuit miles inspected at the end of Q3 and at the end of the year in 2023.<sup>6</sup> Regarding these targets, provide the following:

6. Supporting documentation, such as inspection records, project closeout documentation, and/or field verification showing PacifiCorp inspected 1,027 line miles in 2023 for QAQC post audits - distribution (patrol). Please include the dates of inspection completion.

**8.2.1.2 Targets** - In its 2023-2025 WMP, PacifiCorp describes initiative activity, “QA/QC Post-Audits Transmission (Patrol)” to have a target of 175 circuit miles inspected at the end of Q2, and 329 circuit miles inspected at the end of Q3 and at the end of the year in 2023.<sup>7</sup> Regarding these targets, provide the following:

---

<sup>4</sup> [PacifiCorp’s 2023-2025 WMP](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56336&shareable=true) (Rev. #2, Feb. 22, 2024), p. 186  
(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56336&shareable=true>, accessed August 23, 2024).

<sup>5</sup> [PacifiCorp’s 2023-2025 WMP](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56336&shareable=true) (Rev. #2, Feb. 22, 2024), p. 187  
(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56336&shareable=true>, accessed August 23, 2024).

<sup>6</sup> [PacifiCorp’s 2023-2025 WMP](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56336&shareable=true) (Rev. #2, Feb. 22, 2024), p. 187  
(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56336&shareable=true>, accessed August 23, 2024).

<sup>7</sup> [PacifiCorp’s 2023-2025 WMP](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56336&shareable=true) (Rev. #2, Feb. 22, 2024), p. 187  
(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56336&shareable=true>, accessed August 23, 2024).



7. Supporting documentation, such as inspection records, project closeout documentation, and/or field verification showing PacifiCorp inspected 329 line miles in 2023 for QAQC Post Audits - Transmission (Patrol). Please include the dates of inspection completion.

**8.2.2.1 Detailed inspections and management practices for vegetation clearances around distribution electrical lines and equipment** - In its 2023-2025 WMP, PacifiCorp states, “Pacific Power develops a workplan identifying distribution circuits to be inspected each year based on the established cycle.”<sup>8</sup> These WMP activities are tracked as VM-01 and VM-02 for distribution and VM-06 and VM-07 for transmission. Energy Safety recognizes that PacifiCorp repeats this phrase in other subsections. Regarding this statement, please provide the following for both detailed inspections around distribution (8.2.2.1) *and* transmission (8.2.2.2) electrical lines and equipment:

8. Supporting documentation of the workplan utilized in 2023 for the inspection of distribution *and* transmission circuits as well all the distribution *and* transmission circuits inspected based on the cycle in the workplan. Please include the dates of the inspections, their respective tracking ID’s, identify any vegetation conditions that were inconsistent with PacifiCorp’s Vegetation SOP, what corrections were made to minimize safety and reliability risks posed by vegetation, and the date of completion for the correction.

**8.2.2.1 Detailed inspections and management practices for vegetation clearances around distribution electrical lines and equipment** - In its 2023-2025 WMP, PacifiCorp states, “During inspection, where corrective actions are identified, landowners are notified of the needed vegetation management work and landowner approvals obtained.”<sup>9</sup> Energy Safety recognizes that PacifiCorp repeats this phrase in other subsections. For this statement, please provide the following for both detailed inspections around distribution (8.2.2.1) *and* transmission (8.2.2.2) electrical lines and equipment:

9. All instances where landowners were notified about corrective actions needed because of PacifiCorp's inspection. Include the type of corrective action taken, the date of notification to the landowner, the type of notification, and the date of landowner's approval.

**8.2.2.1 Detailed inspections and management practices for vegetation clearances around distribution electrical lines and equipment** - In its 2023-2025 WMP, PacifiCorp states, “Inspection on a transmission line is generally initiated 1-6 weeks prior to the vegetation management corrective maintenance taking place. As the inspection is completed, the work is released to the vegetation

---

<sup>8</sup> [PacifiCorp’s 2023-2025 WMP](#) (Rev. #2, Feb. 22, 2024), p. 190  
(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56336&shareable=true>, accessed August 23, 2024).

<sup>9</sup>



**OFFICE OF ENERGY INFRASTRUCTURE SAFETY**

715 P Street, 20th Floor | Sacramento, CA 95814  
916 902-6000 | [www.energysafety.ca.gov](http://www.energysafety.ca.gov)

Caroline Thomas Jacobs, Director

management contractor to conduct the corrective maintenance.”<sup>10</sup> Energy Safety recognizes that PacifiCorp repeats this phrase in other subsections. For this statement, please provide the following for both detailed inspections around distribution (8.2.2.1) *and* transmission (8.2.2.2) electrical lines and equipment:

10. Supporting documentation (i.e. Excel file) of inspections on transmission and distribution lines prior to the vegetation management corrective maintenance. Indicate the dates of the inspections and dates of work completed.

**8.2.2.2 Detailed inspections and management practices for vegetation clearances around transmission electrical lines and equipment** - In its 2023-2025 WMP, PacifiCorp states, “Detailed inspections of transmission lines are generally scheduled as follows:

- Main Grid Transmission: Annually
  - Pacific Power linemen conduct annual inspection of main grid transmission lines in compliance with R4 of NERC Standard FAC-003. Pacific Power vegetation management detailed inspections supplement lineman inspections.
- Local Transmission: At a minimum once every three years, in conjunction with the distribution detailed inspection.”<sup>11</sup>

Regarding these statements, provide the following:

11. A schedule or similar supporting documentation that demonstrates detailed inspections of transmission lines scheduled Annually for Main Grid Transmissions and a minimum once every three years for Local Transmission.

**8.2.2.2 Detailed inspections and management practices for vegetation clearances around transmission electrical lines and equipment** – In its 2023-2025 WMP, PacifiCorp states, “Additionally, limited inspections may be conducted/triggered associated with customer requests, agencies, and Pacific Power T&D Operations requests based on observed conditions and/or reliability metrics. Weather events or conditions may also trigger additional limited inspections.”<sup>12</sup> Energy Safety recognizes that PacifiCorp utilizes this phrase in other subsections. For this statement, please provide the following for both detailed *and* patrol inspections around distribution *and* transmission electrical lines and equipment:

<sup>10</sup> [PacifiCorp’s 2023-2025 WMP](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56336&shareable=true) (Rev. #2, Feb. 22, 2024), p. 194  
(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56336&shareable=true>, accessed August 23, 2024).

<sup>11</sup> PacifiCorp’s 2023 WMP Update (Revised DATE). p. 195.

<sup>12</sup> [PacifiCorp’s 2023-2025 WMP](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56336&shareable=true) (Rev. #2, Feb. 22, 2024), p. 195  
(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56336&shareable=true>, accessed August 23, 2024).



12. An Excel file of inspections that were conducted/triggered in association with customer request, agencies, and Pacific Power T&D Operations requests. Include the conditions observed and/or reliability metrics, and weather events or conditions if applicable.

**8.2.2.3 Patrol inspections of vegetation around distribution electric lines and equipment** - In its 2023-2025 WMP, PacifiCorp states, “To further reduce wildfire risk in the HFTD, Pacific Power conducts annual vegetation patrol inspections, generally of distribution lines that are off cycle and of those lines where the detailed inspection is not completed prior to the height of the fire season. This WMP activity is tracked with Tracking ID# VM-03.”<sup>13</sup> Regarding this statement, provide the following:

13. Provide documentation showing annual vegetation patrol inspections conducted in 2023. Include whether the inspection was off cycle and/or not completed prior to the height of fire season, the dates of inspection, and the tracking ID. Identify any vegetation conditions that were inconsistent with PacifiCorp’s Vegetation SOP (from *any* inspections under subsection 8.2.2.3), what corrections were made to minimize safety and reliability risks posed by vegetation, and the date of completion for the correction.

**8.2.2.3 Patrol inspections of vegetation around distribution electric lines and equipment** - In its 2023-2025 WMP, PacifiCorp states, “Pacific Power develops a workplan identifying distribution circuits to be inspected each year (off cycle circuits).”<sup>14</sup> Regarding these statements, provide the following:

14. Supporting documentation of the workplan utilized in 2023 for the inspection of off cycle distribution circuits as well as all the distribution circuits inspected based off the plan. Please include the dates of the inspections and their respective tracking ID’s. To condense documentation, this information can be included in the same documentation utilized to answer question 8.

**8.2.2.3 Patrol inspections of vegetation around distribution electric lines and equipment** - In its 2023-2025 WMP, PacifiCorp states, “Ground inspection is initiated by the inspection contractor, who identifies vegetation conditions in accordance with Pacific Power specifications, which are consistent with applicable regulations (required clearance distances).”<sup>15</sup> Energy Safety recognizes this statement is repeated in other subsections. Regarding this statement, provide the following for all detailed *and* patrol ground inspections of transmission *and* distribution lines:

---

<sup>13</sup> [PacifiCorp’s 2023-2025 WMP](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56336&shareable=true) (Rev. #2, Feb. 22, 2024), p. 195  
(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56336&shareable=true>, accessed August 23, 2024).

<sup>14</sup> [PacifiCorp’s 2023-2025 WMP](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56336&shareable=true) (Rev. #2, Feb. 22, 2024), p. 196  
(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56336&shareable=true>, accessed August 23, 2024).

<sup>15</sup> [PacifiCorp’s 2023-2025 WMP](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56336&shareable=true) (Rev. #2, Feb. 22, 2024), p. 196  
(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56336&shareable=true>, accessed August 23, 2024).





15. An Excel file listing the results from the ground patrol inspections completed in 2023. Include the date of each ground inspection, location, and if conditions met (or failed) required clearance distances.

**8.2.2.3 Patrol inspections of vegetation around distribution electric lines and equipment** - In its 2023-2025 WMP, PacifiCorp states, “Patrol inspections or “readiness patrols” are conducted annually on the entire length of circuits where they are either completely within or only a portion thereof is within HFTD where detailed inspections and associated corrective actions have not been completed or are not scheduled.”<sup>16</sup> Regarding this statement, provide the following:

16. Provide documentation showing that PacifiCorp completed patrol inspections in 2023 on the entire length of circuits within the HFTD. Include the inspection date, number of circuit miles inspected, location, HFTD tier, and corrective actions identified.

**8.2.3.1.1 Wood and Slash Management** - In its 2023-2025 WMP, PacifiCorp states, “Pacific Power manages slash in developed areas by chipping or removing (recycles where practicable) it where accessible, unless the property owner indicates otherwise. In rural, off-road areas Pacific Power uses a lop and scatter and chipping (where accessible) practice to reduce the volume of available fuel within the right-of-way and adheres with land managing agency requirements.”<sup>17</sup> Regarding this statement, provide the following:

17. Supporting documentation (e.g., work orders, photos, etc.) of all examples where PacifiCorp conducted fuel management through the removal of slash from the tree canopy, lop and scatter, chipping of debris, and removal of slash in developed areas. Include the dates, locations (identify those in rural off-road areas), type of work that was prescribed to manage the slash (e.g. mechanical, herbicide, lop and scatter, etc.).

**8.2.3.1.2 Pole Clearing** - In its 2023-2025 WMP, PacifiCorp states, “Consistent with California Public Resource Code (PRC) § 4292, Pacific Power conducts pole clearing activities involving removal of all vegetation within a 10-foot radius cylinder (up to 8 feet vertically) of clear space around a subject pole, removal of dead vegetation from 8 feet to the highest point of the conductor, and applying herbicides and/or soil sterilant to prevent any vegetation regrowth (unless prohibited by law or the property owner). This WMP tracking activity is tracked with Tracking ID# VM-05.”<sup>18</sup> Regarding these statements, provide the following:

<sup>16</sup> [PacifiCorp's 2023-2025 WMP](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56336&shareable=true) (Rev. #2, Feb. 22, 2024), p. 197  
(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56336&shareable=true>, accessed August 23, 2024).

<sup>17</sup> [PacifiCorp's 2023-2025 WMP](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56336&shareable=true) (Rev. #2, Feb. 22, 2024), p. 200  
(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56336&shareable=true>, accessed August 23, 2024).

<sup>18</sup> [PacifiCorp's 2023-2025 WMP](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56336&shareable=true) (Rev. #2, Feb. 22, 2024), p. 201  
(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56336&shareable=true>, accessed August 23, 2024).



**OFFICE OF ENERGY INFRASTRUCTURE SAFETY**

715 P Street, 20th Floor | Sacramento, CA 95814  
916 902-6000 | [www.energysafety.ca.gov](http://www.energysafety.ca.gov)

Caroline Thomas Jacobs, Director

18. Supporting documentation showing pole clearing activities involving removal of all vegetation within a 10-foot radius cylinder (up to 8 feet vertically) of clear space around a subject pole, removal of dead vegetation from 8 feet to the highest point of the conductor, and any instances in which herbicides and/or soil sterilant was applied. Include dates, type of work, and tracking ID.

**8.2.3.1.2 Pole Clearing** - In its 2023-2025 WMP, PacifiCorp states “In addition to state required pole clearing activities, Pacific Power addresses vegetation adjacent to “subject” poles in local responsibility areas to further reduce wildfire ignition risks and increase wildfire resiliency.”<sup>19</sup> Energy Safety recognizes this statement is similar to a target mentioned in subsection **8.2.1.2 Targets**. This information can be included in the same documentation utilized to answer question 1. Regarding this statement, provide the following:

19. Excel file exported from PacifiCorp’s vegetation management database of all the work addressing vegetation adjacent to “subject” poles in the LRA to further reduce wildfire ignition risks and increase wildfire resiliency. Include HFTD designation, LRA designation, and work completion dates for any prescribed work.

**8.2.3.2 Clearance** - In its 2023-2025 WMP, PacifiCorp states, “Pacific Power conducts cycle-based maintenance coupled with annual patrol and corrective maintenance (incremental to routine maintenance) to maintain required minimum clearance distances as identified in Table 1 of GO 95.”<sup>20</sup> Regarding this statement, provide the following:

20. Supporting documentation showing cycle-based maintenance coupled with annual patrol and corrective maintenance was conducted to maintain required minimum clearance distances. Include the date of maintenance, location of maintenance, tracking ID, and the clearance distance achieved.

**8.2.3.2 Clearance** - In its 2023-2025 WMP, PacifiCorp states, “Pacific Power also prunes vegetation beyond minimum required clearances in multiple ways as presented in the Vegetation SOP. First, Pacific Power uses increased clearance distances on distribution lines for certain species of trees, depending on tree growth rate. Pacific Power separates vegetation into three categories: (a) slow-growing; (b) moderate growing; and (c) fast growing. In all cases, Pacific Power applies the 12-foot minimum post-work clearance for slow-growing species. In certain cases, Pacific Power applies an increased clearance for moderate growing and fast-growing species.”<sup>21</sup> To condense documentation,

<sup>19</sup> [PacifiCorp’s 2023-2025 WMP](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56336&shareable=true) (Rev. #2, Feb. 22, 2024), pp. 201-202 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56336&shareable=true, accessed August 23, 2024).

<sup>20</sup> [PacifiCorp’s 2023-2025 WMP](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56336&shareable=true) (Rev. #2, Feb. 22, 2024), p. 202 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56336&shareable=true, accessed August 23, 2024).

<sup>21</sup> [PacifiCorp’s 2023-2025 WMP](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56336&shareable=true) (Rev. #2, Feb. 22, 2024), p. 202 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56336&shareable=true, accessed August 23, 2024).



**OFFICE OF ENERGY INFRASTRUCTURE SAFETY**

715 P Street, 20th Floor | Sacramento, CA 95814  
916 902-6000 | [www.energysafety.ca.gov](http://www.energysafety.ca.gov)

Caroline Thomas Jacobs, Director

this information can be included in PacifiCorp’s response to question 32. Regarding these statements, provide the following:

21. Supporting documentation (i.e., Excel file) showing all instances where PacifiCorp pruned vegetation beyond minimum required clearances. Identify distribution or transmission lines, rate of growth, species, type of clearance used (increased or minimum), and indicate the tracking ID and initiative activity.

**8.2.3.2 Clearance** - In its 2023-2025 WMP, PacifiCorp states, “Third, as a practical matter, Pacific Power will often prune beyond the minimum required distances because of the physical structure of the tree. Pacific Power uses natural target pruning.”<sup>22</sup> Regarding these statements, provide the following:

22. All examples where PacifiCorp used natural target pruning in 2023. Include the date, location, tree species, tracking ID, initiative activity, and the distance cleared.

**8.2.3.2 Clearance** – In its 2023-2025 WMP, PacifiCorp states, “In order to maintain minimum required clearance distances through the cycle maintenance period, Pacific Power may also conduct additional mid-[cycle] inspection and correction activities (hotspot actions) to target cyclebusters, which are those trees that may not hold for an entire cycle (refer to Section 8.2.3.5 for addition discussion).”<sup>23</sup> Regarding these statements, provide the following:

23. Supporting documentation (i.e., Excel file) of all instances in which PacifiCorp conducted additional mid-cycle inspections to target cycle busters in 2023. Include tracking ID, initiative activity, the date of the inspection, location, conditions identified, and date of corrective action completion.

**8.2.3.3 Fall-In Mitigation** - In its 2023-2025 WMP, PacifiCorp states, “Pacific Power identifies and addresses fall-in risk, or hazard trees as part of routine maintenance (detailed inspections) and annual patrols (circuits within or partially within HFTD). Hazard trees identified during inspections are removed or pruned sufficiently to eliminate the hazard. In addition to inspections conducted by vegetation management contractors/personnel, Pacific Power district operations (through line inspections they conduct), customers, agencies, etc., may identify fall-in risk conditions that are vetted by vegetation management and mitigated as warranted.”<sup>24</sup> Regarding these statements, provide the following:

---

<sup>22</sup> [PacifiCorp’s 2023-2025 WMP](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56336&shareable=true) (Rev. #2, Feb. 22, 2024), p. 202  
(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56336&shareable=true>, accessed August 23, 2024).

<sup>23</sup> [PacifiCorp’s 2023-2025 WMP](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56336&shareable=true) (Rev. #2, Feb. 22, 2024), p. 202  
(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56336&shareable=true>, accessed August 23, 2024).

<sup>24</sup> [PacifiCorp’s 2023-2025 WMP](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56336&shareable=true) (Rev. #2, Feb. 22, 2024), p. 203  
(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56336&shareable=true>, accessed August 23, 2024).



24. Supporting documentation showing the total number of hazard trees identified, addressed, and removed during routine maintenance (detailed inspections) and annual patrols (circuits within or partially within HFTD) in 2023. Include dates of removal or pruned work that sufficiently eliminated the hazard. Additionally, identify any fall-in risk conditions that were vetted and mitigated as warranted by vegetation management.

**8.2.3.4 Substation Defensible Space** - In its 2023-2025 WMP, PacifiCorp states, “Pacific Power performs substation inspections for vegetation to remove overhang limbs or climbable vegetation and remove weeds. As part of the detailed and patrol inspections, hazard trees are identified and mitigated to address fall-in risk.”<sup>25</sup> Regarding this statement, provide the following:

25. An Excel file of all substation inspections performed in 2023 to remove vegetation. Include the date of the substation inspection, date of vegetation removal, and the corrective work conducted.

**8.2.3.5 At-Risk Species** - In its 2023-2025 WMP, PacifiCorp states, “Within the HFTD, pruning is performed to prevent vegetation from breaching a 4-foot minimum clearance within one year. This may require additional pruning for at-risk species with very fast growth rates. Pre-listers also identify discretionary removals of at-risk species to eliminate ignition risk and need for cyclical pruning.”<sup>26</sup> Regarding these statements, provide the following:

26. Supporting documentation of all pruning performed to prevent vegetation from breaching a 4-foot minimum clearance within one year in the HFTD. Include the date of work completed, HFTD tier, any additional pruning for at-risk species (please identify) with very fast growth rates, and any discretionary removals of at-risk species.

**8.2.3.6 Fire Resilient Right-of-Ways** - In its 2023-2025 WMP, PacifiCorp states, “Pacific Power utilizes integrated vegetation management (IVM) best practices to manage vegetation in which undesirable vegetation is identified and selected control(s) are implemented, consistent with the American National Standards Institute guidance.”<sup>27</sup> Regarding this statement, provide the following:

27. Supporting documentation listing the IVM best practices as well as the vegetation management activities they assist in managing.

---

<sup>25</sup> [PacifiCorp's 2023-2025 WMP](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56336&shareable=true) (Rev. #2, Feb. 22, 2024), p. 204  
(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56336&shareable=true>, accessed August 23, 2024).

<sup>26</sup> [PacifiCorp's 2023-2025 WMP](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56336&shareable=true) (Rev. #2, Feb. 22, 2024), p. 205  
(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56336&shareable=true>, accessed August 23, 2024).

<sup>27</sup> [PacifiCorp's 2023-2025 WMP](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56336&shareable=true) (Rev. #2, Feb. 22, 2024), p. 205  
(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56336&shareable=true>, accessed August 23, 2024).



**8.2.3.6 Fire Resilient Right-of-Ways** - In its 2023-2025 WMP, PacifiCorp states, “In addition, Pacific Power promotes right tree in right place or small trees for small places concepts with customers coupled with our tree replacement voucher program. Tree replacement vouchers may be provided to customers on a case-by-case basis to offset removal of incompatible species within or adjacent to the right-of-way. Pacific Power provides information to customers regarding vegetation that is compatible with utility rights-of-way and coordinates with communities through Arbor Day functions or other educational outreach opportunities.”<sup>28</sup> Regarding these statements, provide the following:

28. Provide the total number of instances in which PacifiCorp gave customers tree replacement vouchers. Include all documentation provided to the customer regarding compatible trees with utility rights-of-way, the incompatible species on the customer’s property, and date of removal and replacement.

**8.2.3.7 Emergency Response of Vegetation Management** - In its 2023-2025 WMP, PacifiCorp states, “Pacific Power has developed daily weather briefings that provide weather forecast information as a tool for management/response-based decision making. Based on these weather forecasts and at times of elevated risk, vegetation management actions may be taken, including targeted patrols to identify and address potential ignition risks due to vegetation and inform decision making (including PSPS events). These patrols may be performed throughout the weather event and/or PSPS event and are initiated and prioritized based on risk and situational awareness.”<sup>29</sup> Regarding these statements, provide the following:

29. Did PacifiCorp experience any PSPS or elevated weather events in 2023? If so, how many? Include supporting documentation of targeted patrols being utilized during the PSPS or elevated weather events, if applicable.

**8.2.3.7 Emergency Response of Vegetation** – In its 2023-2025 WMP, PacifiCorp states, “Regarding response to wildfires, Pacific Power foresters and/or vegetation management contractors patrol wildfire-impacted areas adjacent to electrical infrastructure to identify trees impacted by fire within strike distance of electrical infrastructure, determine risk, and determine strategy for mitigating the identified risk. Trees that pose an imminent risk are topped or felled to eliminate the risk as soon as practicable. Depending on the risk identified and considering other factors such as land ownership and environmental concerns, other mitigation efforts to address remaining fire-impacted trees may occur.”<sup>30</sup> Regarding this statement, provide the following:

<sup>28</sup> [PacifiCorp’s 2023-2025 WMP](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56336&shareable=true) (Rev. #2, Feb. 22, 2024), p. 205  
(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56336&shareable=true>, accessed August 23, 2024).

<sup>29</sup> [PacifiCorp’s 2023-2025 WMP](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56336&shareable=true) (Rev. #2, Feb. 22, 2024), p. 206  
(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56336&shareable=true>, accessed August 23, 2024).

<sup>30</sup> [PacifiCorp’s 2023-2025 WMP](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56336&shareable=true) (Rev. #2, Feb. 22, 2024), p. 206  
(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56336&shareable=true>, accessed August 23, 2024).



30. Supporting documentation extracted from PacifiCorp’s vegetation management database listing all trees identified as posing an imminent risk in wildfire-impacted areas adjacent to electrical infrastructure. Include the date of patrol, wildfire-impacted area, risk, type of corrective action, and date of mitigation.

**8.2.4 Vegetation Management Enterprise System**– In its 2023-2025 WMP, PacifiCorp states, “Pacific Power seeks opportunities to refine the MDMS data collection process through creating new forms or updating existing forms to capture additional data fields as data gaps are identified to allow for informed vegetation management program decision making. Pacific Power has updated several forms including the inventory, work complete, adder request, audit exception, tree coupon (voucher) and property owner refusal to enhance data collection and tracking capabilities.”<sup>31</sup> Regarding these statements, provide the following:

31. Supporting documentation extracted from MDMS showing any data gaps that were identified and the specific improvements PacifiCorp made in response to these gaps.

**8.2.5 Quality Assurance and Quality Control** - In its 2023-2025 WMP, PacifiCorp states, “Post-audits are completed annually and include review of routine maintenance (work identified during detailed inspections) and additional work completed annually within the HFTD (work identified during patrol inspections).”<sup>32</sup> Regarding this statement, provide the following:

32. All post-audit results for detailed and patrol inspections in 2023. Include the date of the audit, work identified, location, and corrective actions taken.

**8.2.5 Quality Assurance and Quality Control** - In its 2023-2025 WMP, PacifiCorp states, “The staff conducting post-audits record work exceptions (inconsistencies with Pacific Power specifications or work missed) using the MDMS. The audit exceptions are then visible to the vegetation management contractor within the MDMS and assigned to that contractor, who remains responsible for the work, including any corrective action.”<sup>33</sup> Regarding this statement, provide the following:

---

<sup>31</sup> [PacifiCorp’s 2023-2025 WMP](#) (Rev. #2, Feb. 22, 2024), p. 207  
(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56336&shareable=true>, accessed August 23, 2024).

<sup>32</sup> [PacifiCorp’s 2023-2025 WMP](#) (Rev. #2, Feb. 22, 2024), p. 207  
(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56336&shareable=true>, accessed August 23, 2024).

<sup>33</sup> [PacifiCorp’s 2023-2025 WMP](#) (Rev. #2, Feb. 22, 2024), p. 208  
(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56336&shareable=true>, accessed August 23, 2024).



33. Supporting documentation extracted from MDMS showing that PacifiCorp recorded work exceptions. Include the corrective actions done by the vegetation management contractor once the audit exception was assigned to them.

**8.2.6 Open Work Orders** - In its 2023-2025 WMP, PacifiCorp states, “In 2022, Pacific Power created a report that links forms (e.g., inventory and work complete) at a work location. In 2023, this report will be reviewed and modified to allow for tracking of open work locations (locations without a work complete form) to help drive completion of any open work locations prior to end of each calendar year.”<sup>34</sup> Regarding these statements, provide the following:

34. The modified report used in 2023 extracted from PacifiCorp’s database MDMS showing the tracking of open work locations. Include the report used in 2022 for comparison.

**8.2.7 Workforce Planning** – In its 2023-2025 WMP, PacifiCorp states, “Pacific Power requires that its utility foresters are certified arborists and certified utility specialists by the International Society of Arboriculture (ISA). Pacific Power is not directly responsible for the training of the vegetation management workforce, who are employees of an independent contractor, however, does provide annual environmental awareness training and conducts audits and crew visits, which may lead to discussions and opportunities for improvement.”<sup>35</sup>

35. An Excel file listing all PacifiCorp foresters along with their ISA certifications. Additionally, provide supporting documentation of PacifiCorp’s annual environmental awareness trainings (i.e. agendas, presentations, handouts, etc. dated for 2023).

## **END OF REQUEST**

<sup>34</sup> [PacifiCorp’s 2023-2025 WMP](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56336&shareable=true) (Rev. #2, Feb. 22, 2024), p. 210.  
(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56336&shareable=true>, accessed August 23, 2024).

<sup>35</sup> [PacifiCorp’s 2023-2025 WMP](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56336&shareable=true) (Rev. #2, Feb. 22, 2024), p. 211.  
(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56336&shareable=true>, accessed August 23, 2024).