



State of California – 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:** Thursday November 30, 2023

**Response Due:** Tuesday December 5, 2023

**To:** Pooja Kishore, Regulatory Affairs Manager  
PacifiCorp  
[Pooja.Kishore@pacificorp.com](mailto:Pooja.Kishore@pacificorp.com)

**Originator:** Jessica McHale, Wildfire Safety Analyst  
[jessica.mchale@energysafety.ca.gov](mailto:jessica.mchale@energysafety.ca.gov)

**Data Request Number:** OEIS-P-WMP\_2023-PC-010

### **Subjects:**

- Q01. Lessons learned from past wildfires
- Q02. Regarding current process for ranking and selecting mitigations
- Q03. Regarding wildfire consequence and risk calculations
- Q04. Regarding planned process for ranking and selecting mitigations

## 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.
- b. Responses and documents may be produced and served electronically, but they must be fully machine-readable and searchable.
- c. 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.
- d. 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, business address, and title of each employee, consultant, or agent who provided such information.
- e. If you do not know the exact answer to any of the requests below, please so indicate and provide your best estimate.
- f. Provide data in its original format (e.g., PDF, Excel, GIS shapefile, etc.), unless otherwise specified in the request.
- g. Submit your response to the 2023-2025 WMP Data Requests docket (#2023-2025-WMP-DRs) and note the requirements for confidential submissions. Please also email the response to Jessica McHale ([jessica.mchale@energysafety.ca.gov](mailto:jessica.mchale@energysafety.ca.gov)), copying:
  - i. Nicole Dunlap ([nicole.dunlap@energysafety.ca.gov](mailto:nicole.dunlap@energysafety.ca.gov))
  - ii. Jolynne Flores ([jolynne.flores@energysafety.ca.gov](mailto:jolynne.flores@energysafety.ca.gov))
  - iii. Luis Medina ([Luis@Level4Ventures.com](mailto:Luis@Level4Ventures.com))
  - iv. Matthew Raphaelson ([matthew@level4ventures.com](mailto:matthew@level4ventures.com))

## REQUEST

### Q01. Regarding lessons learned from past wildfires:

- a. In Appendix D of its WMP, in response to a 2022 area for continued improvement regarding lessons learned from past wildfires (identified by Energy Safety in its Decision on PacifiCorp's 2022 WMP Update), PacifiCorp states that it is planning to implement fire incident tracking in Q2 2024. PacifiCorp further explains that after the implementation of fire incident tracking, it expects to design and integrate new processes to perform trend and root cause analysis for ignitions by the end of 2024.<sup>1</sup>
  - i. Is the fire incident tracking database the method PacifiCorp plans to use to investigate the cause(s) of PacifiCorp-ignited catastrophic wildfires and to identify associated lessons learned?
    - (1) If not, does PacifiCorp currently use or plan to use any other methods for investigating the cause(s) of PacifiCorp-ignited catastrophic wildfires and identifying associated lessons learned?
      - (a) If so, please describe these other methods, including a timeline for implementation.
- b. In Section 10 of its WMP, PacifiCorp does not provide a narrative detailing lessons learned from PacifiCorp-ignited catastrophic wildfires (as listed in Section 5.3.2). In addition, PacifiCorp does not detail specific mitigation measures implemented as a result of these lessons learned nor demonstrate how the mitigation measures are being integrated into PacifiCorp's wildfire mitigation strategy.
  - i. Please confirm if this information was left out given PacifiCorp's response to PC-22-06 (as described above and in Appendix D) and given that PacifiCorp has not yet implemented fire incident tracking or integrated processes to perform trend and root cause analysis for ignitions.
    - (1) If this is incorrect, please explain why this information was left out of Section 10 of PacifiCorp's WMP.

### Q02. Regarding PacifiCorp's current<sup>2</sup> process for ranking and selecting mitigations:

- a. Energy Safety understands that PacifiCorp divides its territory into risk tranches (i.e., "buckets" or risk categories) according to wildfire risk.
  - i. Please list and describe each of the risk tranches or "buckets" PacifiCorp has identified.
  - ii. Please describe the criteria used to determine these risk tranches.
    - (1) If PacifiCorp uses a qualitative checklist or some other tool, please provide this checklist or tool, as well as an explanation of the checklist or tool.

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<sup>1</sup> PacifiCorp's Revised 2023-2025 WMP, PC-22-06, pages 389-390.

<sup>2</sup> As of 2023-2025 WMP and prior to implementation of new risk model.

iii. What is PacifiCorp's current process for prioritizing and selecting mitigations within a given risk tranche?

(1) If all the mitigations are selected for a risk tranche, does PacifiCorp move on to the next tranche?

(a) If so, what is the process to prioritize and select mitigations.

**Q03. Regarding wildfire consequence and risk calculations:**

a. In response to an Energy Safety data request (OEIS-P-WMP\_2023-PC-007), PacifiCorp provided an explanation of how it uses percentiles within its wildfire consequence calculation.<sup>3</sup> PacifiCorp stated that the 95th percentile was used to determine the severity of weather days for its wildfire simulation (higher percentile = worse weather). PacifiCorp also stated that out of 5,400 possible weather days, 300 were selected for the risk model calculation.

i. Does PacifiCorp currently<sup>4</sup> use the process described above and in PacifiCorp's data request response in its methodology for calculating wildfire consequence and/or risk scores?

(1) If so, when (what date) was this process implemented?

ii. How is the 95th percentile used to select the 300 days?

(1) Provided a numerical example which includes the order of operations.

iii. How are the 300 days used to calculate risk scores? Please provide a numerical example.

(1) Are 95th percentiles applied in any other parts of the formula to calculate risk scores? If so, provide a numerical example which includes the order of operations.

iv. How are the risk scores aggregated and used? I.e., How are subsegment risk scores aggregated to a circuit level?

**Q04. Regarding PacifiCorp's planned<sup>5</sup> process for ranking and selecting mitigations:**

a. Are the models and methodologies described in question "Q03" above used to calculate the risk impact of mitigations?

i. If yes, please describe PacifiCorp's risk impact calculations for mitigations (e.g., calculations following the steps listed on page 117 of PacifiCorp's WMP) and include a numerical example.

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<sup>3</sup> [PacifiCorp's response to data request OEIS-P-WMP\\_2023-PC-007](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55970&shareable=true)

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55970&shareable=true>, accessed November 29, 2023).

<sup>4</sup> As of on-going implementation of new risk model.

<sup>5</sup> As of on-going implementation of new risk model.

- ii. If not, describe the quantitative and/or qualitative process used to calculate the risk impact of mitigations.
- b. How is a post-mitigation risk score calculated?
- c. Once the risk impact of mitigations are calculated, how are mitigations then prioritized and selected?

**END OF REQUEST**