



State of California – A 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:** Friday, July 19, 2024

**Response Due:** Wednesday, July 24, 2024

**To:** Pooja Kishore, Regulatory Affairs Manager  
Pooja.Kishore@pacificorp.com  
PacifiCorp dba Pacific Power  
825 NE Multnomah Street, Suite 2000  
Portland, OR 97232

**Cc:** [Datareq@pacificorp.com](mailto:Datareq@pacificorp.com)

**Originator:** Jolynne Flores, Wildfire Safety Analyst  
Jolynne.Flores@energysafety.ca.gov

**Data Request Number:** OEIS-P-WMP\_2024-PC-01

### **Subject(s):**

- Q01. Regarding PacifiCorp's Forecast Completion Dates for Vegetation Management QA/QC (VM-11)
- Q02. Regarding PacifiCorp's Pole Clearing Expenditure Changes (VM-05)
- Q03. Regarding PacifiCorp's Vegetation Clearance – Transmission Expenditure Changes (VM-07)
- Q04. Regarding PacifiCorp's expansion of vegetation patrol inspections to the entire territory, including the newly defined HFRA.
- Q05. Regarding initiative additions in the 2023-2025 Base WMP Redline

## INSTRUCTIONS

1. 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.
2. Responses and documents may be produced and served electronically, but they must be fully machine-readable and searchable.
3. 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.
  - a. 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.
4. 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, email, business address, and title of each employee, consultant, or agent who provided such information.
5. If you do not know the exact answer to any of the requests below, please so indicate and provide your best estimate.
6. Provide data in its original format (e.g., PDF, Excel, GIS shapefile, etc.), unless otherwise specified in the request.
7. Submit your response to the 2023-2025 WMP Data Requests docket (#2023-2025-WMP-DRs) by close of business on the response due date. Submit confidential information through the confidential e-filing process. Do not submit confidential responses through email.
8. Email the non-confidential portion of the response to Jolynne Flores ([Jolynne.Flores@energysafety.ca.gov](mailto:Jolynne.Flores@energysafety.ca.gov)), copying:
  - a. Nicole Dunlap ([Nicole.Dunlap@energysafety.ca.gov](mailto:Nicole.Dunlap@energysafety.ca.gov))
  - b. Jessica Tse ([Jessica.Tse@energysafety.ca.gov](mailto:Jessica.Tse@energysafety.ca.gov))
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## REQUEST

### **Q01. Regarding PacifiCorp's Forecast Completion Dates for Vegetation Management QA/QC (VM-11):**

In its 2025 WMP Update, PacifiCorp reports an updated forecasted completion date to “Create SME process & procedure for VM database review” and “Develop audits to provide understanding of the data collection process” (Initiative ID VM-11). The completion date changed from December 2025 to “deferred due to GeoDigital database upgrade.”<sup>1</sup>

- a. Is the GeoDigital database the same “VM database” PacifiCorp references in Initiative ID VM-11?
  - i. If not, provide a brief description of the GeoDigital database and the VM database referenced in Initiative ID VM-11 and clarify the relationship between them.
- b. When is the update to the GeoDigital database expected to be completed?
- c. Provide a specific updated forecasted completion date (e.g., Q2 2025) for Initiative ID VM-11 or justification for the completion date remaining unknown.

### **Q02. Regarding PacifiCorp's Pole Clearing Expenditure Changes (VM-05):**

In its 2025 WMP Update, PacifiCorp includes a 60 percent increase in its 2025 projected expenditure for pole clearing (VM-05)<sup>2</sup> with the explanation, “the increase in the cost is based on actual expenditures being higher than forecasted to perform pole clearing on a similar number of units.”<sup>3</sup>

- a. Explain how PacifiCorp forecasts expenditure for its pole clearing initiative.
- b. Explain what factors in the historical spend data caused the forecasted expenditure for 2025 to increase (e.g., include in your explanation information on increased cost of labor, new regulation/law, etc.).

### **Q03. Regarding PacifiCorp's Vegetation Clearance – Transmission Expenditure Changes (VM-07):**

In its 2025 WMP Update, PacifiCorp includes a 61 percent increase in its 2025 projected expenditure for vegetation clearance - transmission (VM-07)<sup>4</sup> with the explanation “the inclusion of the HFRA areas described in the risk model updates, the costs are forecasted to

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<sup>1</sup> [PacifiCorp's 2025 WMP Update](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56987&shareable=true) (July 8, 2024), p. 15 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56987&shareable=true, accessed July 15, 2024).

<sup>2</sup> [PacifiCorp's 2025 WMP Update](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56987&shareable=true) (July 8, 2024), p. 17 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56987&shareable=true, accessed, July 15, 2024).

<sup>3</sup> [PacifiCorp's 2025 WMP Update](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56987&shareable=true) (July 8, 2024), p. 18 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56987&shareable=true, accessed, July 15, 2024).

<sup>4</sup> [PacifiCorp's 2025 WMP Update](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56987&shareable=true) (July 8, 2024), p. 17 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56987&shareable=true, accessed, July 15, 2024).

increase.”<sup>5</sup> However, the addition of the HFRA results in a nearly 35 percent increase in transmission circuit miles.<sup>6</sup>

- a. Explain how PacifiCorp forecasts expenditure for its Vegetation Clearance – Transmission initiative.
- b. Explain how a 35 percent increase in number of circuit miles for this initiative translates to a 61 percent expenditure increase (e.g., include in your explanation information on deferred maintenance on newly scoped circuit miles, one-time cost for expanding clearances in newly scoped circuit miles, etc.).

**Q04. Regarding PacifiCorp’s expansion of vegetation patrol inspections to the entire territory, including the newly defined HFRA.**

In Table 3 of its 2025 WMP Update, PacifiCorp indicates 120 transmission line miles and 488 distribution lines miles are included in the newly defined HFRA.<sup>7</sup> PacifiCorp’s 2023-2025 Base WMP redline indicates that patrol inspections (VM-03 and VM-04) will occur in the newly defined HFRA and in the non-HFTD/HFRA.<sup>8</sup> However, the narrative discussion describes conducting patrol inspections only on the portion of the lines within the HFTD.<sup>9</sup> Furthermore, 2025 end of year circuit mile targets are unchanged.<sup>10</sup>

- a. Clarify whether patrol inspections (VM-03 and VM-04) will occur in the HFRA and/or the non-HFTD/HFRA in 2025.
  - i. If patrol inspections will occur beyond the HFTD in 2025, explain why 2025 end-of-year targets for VM-03 and VM-04 are unchanged.
  - ii. If patrol inspections will occur beyond the HFTD in 2025, explain why expenditures related to patrol inspections are unchanged.
  - iii. If patrol inspections will not occur beyond the HFTD in 2025, clarify the information provided in the unnamed table found on pp. 137-141 of PacifiCorp’s updated 2023-2025 WMP.
- b. Populate the empty cells of the table below:

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<sup>5</sup> [PacifiCorp’s 2025 WMP Update](#) (July 8, 2024), p. 18

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56987&shareable=true>, accessed, July 15, 2024).

<sup>6</sup> Based on Table 3 in [PacifiCorp’s 2025 WMP Update](#) (July 8, 2024), p. 9

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56987&shareable=true>, accessed, July 15, 2024). Table 3 shows 344 transmission line miles in HFTD Tier 2 and Tier 3 (321 + 23) and an addition of 120 transmission line miles for the newly defined HFRA.

<sup>7</sup> [PacifiCorp’s 2025 WMP Update](#) (July 8, 2024), p. 9

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56987&shareable=true>, accessed, July 15, 2024).

<sup>8</sup> [PacifiCorp’s 2023-2025 Base WMP redline](#) (July 8, 2024), p. 140

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56991&shareable=true>, accessed July 19, 2024).

<sup>9</sup> [PacifiCorp’s 2023-2025 Base WMP redline](#) (July 8, 2024), pp. 216-220

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56991&shareable=true>, accessed July 19, 2024).

<sup>10</sup> [PacifiCorp’s 2023-2025 Base WMP redline](#) (July 8, 2024), p. 207

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56991&shareable=true>, accessed July 19, 2024).

<b>Initiative</b>	<b>2025 Target (Circuit Miles)</b>	<b>Circuit Miles of 2025 Target in HFTD</b>	<b>Circuit Miles of 2025 Target in HFRA</b>	<b>Circuit Miles of 2025 Target in Non-HFTD/HFRA</b>
<b>Patrol Inspections – Distribution (VM-03)</b>	922			
<b>Patrol Inspections – Transmission (VM-04)</b>	329			

**Q05. Regarding initiative additions in the 2023-2025 Base WMP Redline:**

- a. In the paragraph above the unnamed table on pp. 136-141 of its 2023-2025 Base WMP Redline, PacifiCorp states, “Additional mitigation measures have been added to the table to reflect the full suite of mitigations Pacific Power may consider.”<sup>11</sup> For each redlined initiative, indicate if the initiative is currently implemented, new, being considered, pilot, etc.
  - i. If not yet implemented (e.g., new, being considered, pilot, etc.), provide:
    - 1. A potential implementation date.
    - 2. Why PacifiCorp added the potential initiative to the table at this time.
- b. If a redlined initiative is currently implemented, indicate why said initiative was not in PacifiCorp’s 2023-2025 Base WMP.
- c. Under what allowable 2025 WMP Update is each redlined initiative in the table being updated?

**END OF REQUEST**

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<sup>11</sup> [PacifiCorp’s 2023-2025 Base WMP Redline](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56991&shareable=true) (July 8, 2024), pp. 136-141 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56991&shareable=true, accessed July 19, 2024).