



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: Wednesday, August 7, 2024

Response Due: Monday, August 12, 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

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

Data Request Number: OEIS-P-WMP_2024-PC-02

Subject(s):

- Q01. Regarding the Expenditure Changes for Initiative WP-01: Wildfire Mitigation Strategy Development
- Q02. Regarding the Expenditure Changes for Initiative WP-02: Identifying and Evaluating Mitigation Initiatives
- Q03. Regarding PacifiCorp's Expectations for PC-23-07: Cross-Utility Collaboration on Best Practices for Inclusion of Climate Change Forecasts in Consequence Modeling, Inclusion of Community Vulnerability in Consequence Modeling, and Utility Vegetation Management for Wildfire Safety
- Q04. Regarding the Collaboration Reported in PC-23-07: Cross-Utility Collaboration on Best Practices for Inclusion of Climate Change Forecasts in Consequence Modeling, Inclusion of Community Vulnerability in Consequence Modeling, and Utility Vegetation Management for Wildfire Safety
- Q05. Regarding Status of 2025 Targets
- Q06. Regarding PC-23-15 and PacifiCorp's Response Time for Outages in its Enhanced Fire Risk (EFR) Outage Summary Spreadsheet

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), copying:
 - a. Nicole Dunlap (Nicole.Dunlap@energysafety.ca.gov)
 - b. Jessica McHale (Jessica.McHale@energysafety.ca.gov)
 - c. Johan Im (Johan.Im@energysafety.ca.gov)
 - d. Danielle Dooley (Danielle.dooley@energysafety.ca.gov)
 - e. Francis Solis (Francis.Solis@energysafety.ca.gov)

REQUEST

Q01. Regarding the Expenditure Changes for Initiative WP-01: Wildfire Mitigation Strategy Development:

- a. In its 2025 WMP Update, PacifiCorp states that the expenditure increase for initiative WP-01, “is based on actual expenditures realized as well as the inclusion of costs for an independent evaluator.”¹
 - i. What were the original expenditures associated with the WP-01 initiative?
 - ii. Where in PacifiCorp’s approved 2023-2025 Base WMP do the expenditures for WP-01 appear (section and page numbers)?
 - iii. Where in PacifiCorp’s Redlined 2023-2025 Base WMP do the updated expenditures for the WP-01 initiative appear (section and page numbers)?
 - iv. When did costs associated with WP-01 first appear in PacifiCorp’s QDR data (year and quarter)?
 - v. Have WP-01 costs appeared in PacifiCorp’s general rate case (GRC)?
 - 1) If yes, when did they first appear and at what phase in the GRC cycle?
 - vi. Was the independent evaluator required by Energy Safety or another regulator? What is the independent evaluator investigating as part of this initiative?
 - 1) Where in PacifiCorp’s approved 2023-2025 Base WMP is the independent evaluator mentioned?
 - 2) Where in PacifiCorp’s Redlined 2023-2025 Base WMP are the details regarding the independent evaluator?
 - vii. How are costs allocated between the independent evaluator costs and the costs associated with carrying out the initiative?
 - 1) Was the independent evaluator included in the original cost estimate for the WP-01 initiative in PacifiCorp’s approved 2023-2025 Base WMP?
 - A. If no, please state when PacifiCorp began including the independent evaluator costs in the expenditures for the WP-01 initiative.
 - 2) Please state when costs for the independent evaluator first appeared in PacifiCorp’s QDR data.
 - viii. What factors are responsible for the 55 percent cost increase in this initiative? Factors could include, but are not limited to: capital cost increases, permitting delays, supply chain disruptions, personnel, etc.

¹ [PacifiCorp’s 2025 WMP Update](#) (July 8, 2024), p. 18

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56987&shareable=true>, accessed July 24, 2024).

Q02. Regarding the Expenditure Changes for Initiative WP-02: Identifying and Evaluating Mitigation Initiatives:

- a. In its 2025 WMP Update, PacifiCorp states that the cost for initiative WP-02, “has been updated to reflect ongoing work to pursue grant opportunities.”²
 - i. What types of activities were included for initiative WP-02 in PacifiCorp’s approved 2023-2025 Base WMP?
 - ii. What types of activities are forecasted for initiative WP-02 for 2025?
 - iii. When did PacifiCorp first begin incorporating initiative WP-02 into its suite of wildfire mitigations?
 - iv. Has the WP-02 initiative ever appeared in PacifiCorp’s GRC?
 - 1) If yes, when did it appear and in what phase of the GRC?
 - v. Explain what grant opportunities PacifiCorp is pursuing as part of this initiative.
 - 1) Was grant writing originally part of this initiative?
 - A. If no, when was this added to the scope of WP-02 and when did it first appear in PacifiCorp’s QDR data?
 - vi. Explain what “ongoing work” means for this initiative.
 - vii. What factors are responsible for the 180 percent cost increase in this initiative? Factors could include, but are not limited to: capital cost increases, permitting delays, supply chain disruptions, personnel, etc.

Q03. Regarding PacifiCorp’s Expectations for PC-23-07: Cross-Utility Collaboration on Best Practices for Inclusion of Climate Change Forecasts in Consequence Modeling, Inclusion of Community Vulnerability in Consequence Modeling, and Utility Vegetation Management for Wildfire Safety:

- a. In its 2025 WMP Update, PacifiCorp states that it “expects to participate in joint IOU workgroups or sessions.”³
 - i. Explain how PacifiCorp “expects to participate.” For example:
 - 1) Has PacifiCorp been invited to participate in a non-Energy Safety sponsored event hosted by the other California investor-owned utilities⁴ (IOUs) since filing its approved 2023-2025 Base WMP?
 - 2) Is PacifiCorp planning on sponsoring a joint collaboration (meeting, phone call, webinar, etc.) with the other California IOUs?

² [PacifiCorp’s 2025 WMP Update](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56987&shareable=true) (July 8, 2024), p. 19

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56987&shareable=true>, accessed July 24, 2024).

³ [PacifiCorp’s 2025 WMP Update](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56987&shareable=true) (July 8, 2024), p. 26

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56987&shareable=true>, accessed July 24, 2024).

⁴ San Diego Gas & Electric, Southern California Edison, Pacific Gas & Electric, Bear Valley Electric Service, Liberty Utilities.

Q04. Regarding the Collaboration Reported in PC-23-07: Cross-Utility Collaboration on Best Practices for Inclusion of Climate Change Forecasts in Consequence Modeling, Inclusion of Community Vulnerability in Consequence Modeling, and Utility Vegetation Management for Wildfire Safety:

- a. In its 2025 WMP Update, PacifiCorp states that “PacifiCorp also participates in the Covered Conductor Joint Utility Working Group to share learnings...”.⁵
 - i. Has PacifiCorp collaborated with any of the other California IOUs on the inclusion of climate change forecasts in consequence modeling, inclusion of community vulnerability in consequence modeling, utility vegetation management for wildfire safety, and/or the WMP, apart from PacifiCorp’s participation in the Covered Conductor Joint Utility Working Group?
 - 1) If yes, please state when these collaborations took place and what venue PacifiCorp used to collaborate (i.e., meeting, phone call, webinar, etc.).
 - ii. PacifiCorp did not list any collaboration with Liberty Utilities or Bear Valley Electric Service. Has PacifiCorp met with Bear Valley Electric Service and/or Liberty Utilities since 2023 regarding matter related to their WMP?

Q05. Regarding Status of 2025 Targets:

- a. PacifiCorp indicated to Energy Safety that some of its 2025 targets in its Redlined 2023-2025 Base WMP are still being developed (e.g., targets in Table 8-16 “Vegetation Inspections and QAQC Targets by Year”). It also confirmed that 2025 targets missing from its 2025 WMP Update were an oversight.
 - i. For all 2025 targets in PacifiCorp’s Redlined Base WMP, indicate by initiative ID and cite to its Redline and Update:
 - 1) Which targets are firm.
 - 2) Which targets are still being developed.

Q06. Regarding PC-23-15 and PacifiCorp’s Response Time for Outages in its Enhanced Fire Risk (EFR) Outage Summary Spreadsheet:

- a. In its 2025 WMP Update, PacifiCorp provided an EFR outage summary spreadsheet. Some of the outage response times were negative in the spreadsheet
 - i. Were the outage response times correctly marked as negative?
 - 1) If not, please provide the correct outages response times for each.
 - ii. Explain how outage response times are determined and/or calculated.

⁵ [PacifiCorp’s 2025 WMP Update](#) (July 8, 2024), p. 26

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56987&shareable=true>, accessed July 24, 2024).

END OF REQUEST