



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: Thursday, August 29, 2024

Response Due: Wednesday, September 4, 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-05

Subject(s):

- Q01. Regarding completion date for VM-11-associated objectives
- Q02. Regarding absence of HFRA designation for WP-02 in initiative prioritization table
- Q03. Regarding absence of HFRA designation for VM-11 in initiative prioritization table

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. Kyra Purvis (Kyra.Purvis@energysafety.ca.gov)
 - e. Danielle Dooley (Danielle.Dooley@energysafety.ca.gov)

REQUEST

Q01. Regarding completion date for VM-11-associated objectives:

In its 2025 WMP Update, PacifiCorp updated the completion date for two objectives¹ associated with VM-11, “Create SME process & procedure for VM database review four times a year” and “Develop audits to provide understanding of the data collection process,” from December 2024 to “Deferred due to GeoDigital database upgrade.”² In its response to Energy Safety’s Data Request, PacifiCorp stated the completion date for these two objectives is now Q4 2025.³ PacifiCorp provided one other objective associated with VM-11 that refers to the database: “Create QA/QC process and procedure for benchmarking data in the database and inspections.”⁴

- a. Clarify whether the completion date for this objective, as presented in Table 8-13 “Vegetation Management Implementation Objectives (3-year plan)” of PacifiCorp’s 2023-2025 Base WMP,⁵ remains unchanged.
 - i. If the completion date remains unchanged, provide an explanation as to why the GeoDigital database upgrade does not impact the completion date of this objective.
 - ii. If the completion date requires updating:
 1. Provide a new completion date for this objective.
 2. Provide an explanation of how the GeoDigital database upgrade changes the completion date of this objective.

Q02. Regarding absence of HFRA designation for WP-02 in initiative prioritization table:

In the table on pages 137-141 of PacifiCorp’s redlined 2023-2025 Base WMP, the HFRA column is blank for initiative WP-02.⁶

- a. Why is the HFRA column blank for initiative WP-02?

¹ The objectives are labeled as “Initiative Activity” in [PacifiCorp’s 2025 WMP Update](#) (July 8, 2024), p. 15 (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56987&shareable=true>, accessed August 22, 2024).

² [PacifiCorp’s 2025 WMP Update](#) (July 8, 2024), p. 15 (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56987&shareable=true>, accessed August 22, 2024).

³ [Data Request OEIS-P-WMP_2024-PC-01](#), Question 1 (July 29, 2024), p. 2 (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57091&shareable=true>, accessed August 22, 2024).

⁴ [PacifiCorp’s 2023-2025 Base WMP redline](#) (July 8, 2024), p. 205 (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56991&shareable=true>, accessed August 22, 2024).

⁵ [PacifiCorp’s 2023-2025 Base WMP redline](#) (July 8, 2024), p. 205 (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56991&shareable=true>, accessed August 22, 2024).

⁶ [PacifiCorp’s 2023-2025 Base WMP redline](#) (July 8, 2024), pp. 137-141 (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56991&shareable=true>, accessed August 22, 2024).

- i. For example, are the activities associated with WP-02 outside the scope of PacifiCorp's HFRA?

Q03. Regarding absence of HFRA designation for VM-11 in initiative prioritization table:

In the table on pages 137-141 of PacifiCorp's redlined 2023-2025 Base WMP, the HFRA column is blank for initiative VM-11.⁷

- a. Why is the HFRA column blank for initiative VM-11?
 - i. For example, are the activities associated with VM-11 outside the scope of PacifiCorp's HFRA?

END OF REQUEST

⁷ [PacifiCorp's 2023-2025 Base WMP redline](#) (July 8, 2024), pp. 137-141 (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56991&shareable=true>, accessed August 22, 2024).