



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, October 2, 2024

Response Due: Monday, October 7, 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-06

Subject(s):

- Q01. Regarding PacifiCorp's Risk Reduction
- Q02. Regarding Top Ignition Risk Circuits
- Q03. Regarding PacifiCorp's HFRA
- Q04. Regarding PacifiCorp's Response to PC-23-02
- Q05. Regarding PacifiCorp's Response to PC-23-05

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. Dakota Smith (Dakota.Smith@energysafety.ca.gov)
 - c. Johan Im (Johan.Im@energysafety.ca.gov)
 - d. Andie Biggs (andie.biggs@energysafety.ca.gov)

REQUEST

Q01. Regarding PacifiCorp's Risk Reduction

- a. For the circuits in Table 7-4 in PacifiCorp's redlined 2023-2025 Base WMP R5 (pp. 164-165), provide the same information contained in each column of Table PAC 7-1 in PacifiCorp's redlined 2023-2025 Base WMP R5 (p. 144) which shows the mitigation initiatives being worked on each circuit by year.

Q02. Regarding Top Ignition Risk Circuits

- a. For Table 1-1 in PacifiCorp's redlined 2025 WMP Update R1 (p. 13) provide the following additional information for each circuit:
 - i. Overall ignition score.
 - ii. Percent of total overall ignition risk.

Q03. Regarding PacifiCorp's HFRA

- a. Identify the risk areas (HFTD Tier 3, HFTD Tier 2, HFRA, or non-HFRA) for the circuits provided in Table 1-1 in PacifiCorp's redlined 2025 WMP Update R1 (p. 13).
- b. Identify the risk rankings and risk scores based on the ignition risk scores for the circuits provided in Table PAC 7-1 in PacifiCorp's redlined 2023-2025 Base WMP R5 (p. 144).
- c. Identify all circuits within PacifiCorp's top 10 percent of ignition risk (based on the number of circuits when risk is ranked as opposed to cumulative risk score) that are in PacifiCorp's HFRA, with the following information:
 - i. Circuit name.
 - ii. Risk ranking.
 - iii. Ignition risk score.
 - iv. Circuit-mile-weighted ignition risk score.
 - v. Maximum Fuel/Terrain Risk Score.
 - vi. Percent of total overall ignition risk.

Q04. Regarding PacifiCorp's response to PC-23-02

- a. In PacifiCorp's response to PC-23-02: Calculating Risk Scores Using 95th Percentile Values, PacifiCorp states that it "is discussing this required progress with the FireRisk model vendor to better understand their plan and will update Energy Safety with the vendor's plan and timeline." (PacifiCorp's redlined 2025 WMP Update R1, p. 27) When does PacifiCorp intend to provide this information to Energy Safety to satisfy its response to PC-23-02?

Q05. Regarding PacifiCorp’s response to PC-23-05

- a. In PacifiCorp’s response to PC-23-05: Independent Review Plan Transparency (PacifiCorp’s redlined 2025 WMP Update R1, p. 30), it states that it “has identified two internal projects” to meet the requirement of PC-23-05:
 - i. “Develop Policy and Procedures for Review of Internal Planning Models” and
 - ii. “Independent Review of Planning Risk Models.”

As PacifiCorp was required to, “present actionable tasks it will complete by its 2026-2028 Base WMP to ensure it is fully compliant with the independent review requirements,” provide a timeline breaking down dates and milestones for PacifiCorp’s implementation plan for these two projects to satisfy PacifiCorp’s response to PC-23-05.

END OF REQUEST