



State of California – A Natural Resources Agency
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Gavin Newsom, Governor
Caroline Thomas Jacobs, Director

TRANSMITTED VIA ELECTRONIC MAIL

DATA REQUEST

Request Date: Tuesday, October 15, 2024

Response Due: Friday, October 18, 2024

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

Cc: datareq@pacificcorp.com

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

Data Request Number: OEIS-P-WMP_2024-PC-07

Subject(s):

- Q01. Regarding changes in Maturity Survey responses between 2023 and 2024 – Section 4.1.2
- Q02. Regarding changes in Maturity Survey responses between 2023 and 2024 – Section 4.1.3
- Q03. Regarding changes in Maturity Survey responses between 2023 and 2024 – Section 4.2.1
- Q04. Regarding changes in Maturity Survey responses between 2023 and 2024 – Section 4.2.3
- Q05. Regarding changes in Maturity Survey responses between 2023 and 2024 – Section 4.2.4 and 4.3.4
- Q06. Regarding changes in Maturity Survey responses between 2023 and 2024 – Section 4.3.2
- Q07. Regarding changes in Maturity Survey responses between 2023 and 2024 – Section 4.3.3
- Q08. Requirement for Type 2 Changes to Approved Targets, Objectives, and Expenditures
- Q09. Smoke and Air Quality Sensors (ID# SA-03) Discrepancies and Discontinued Program

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. Kyra Purvis (Kyra.Purvis@energysafety.ca.gov)
 - e. Stephen Volmer (Stephen.Volmer@fire.ca.gov)

REQUEST

Q01. Regarding changes in Maturity Survey responses between the 2023 and 2024 surveys – Section 4.1.2:

In its 2024 survey response to question 4.1.2.Q1, PacifiCorp responded “No” for 2025 and 2026. However, in its 2023 survey response to the same question, PacifiCorp responded “Yes.” Similarly, in its 2024 survey response to question 4.1.2.Q7, PacifiCorp responded “No” for 2026, despite responding “Yes” in its 2023 survey response.¹

- a. Explain why PacifiCorp changed its responses to these questions from “Yes” in the 2023 survey to “No” in the 2024 survey.
- b. Discuss whether the capabilities described in these questions are expected to be included in the new GeoDigital database PacifiCorp plans to roll-out in Q1 2025.²
 - i. If yes, clarify why the Maturity Survey responses indicate the database will not contain this information.
 - ii. If no, explain why these capabilities will not be included in PacifiCorp’s database.

Q02. Regarding changes in Maturity Survey responses between the 2023 and 2024 surveys – Section 4.1.3:

In its 2024 survey responses to questions 4.1.3.Q3, 4.1.3.Q4, and 4.1.3.Q5, PacifiCorp responded “No” for 2025 and 2026. However, in its 2023 survey responses to the same questions, PacifiCorp responded “Yes.”³

- a. Provide details as to why the responses to these questions changed from “Yes” in the 2023 survey to “No” in the 2024 survey.
- b. Discuss whether the practices described in these questions are expected to be implemented with the new GeoDigital database PacifiCorp plans to roll-out in Q1 2025.⁴
 - i. If yes, clarify why the Maturity Survey responses indicate these practices are not in place.
 - ii. If no, describe how PacifiCorp plans to assess and understand strengths and weaknesses of its data and data collection process(es).

¹ PacifiCorp’s 2024 Wildfire Mitigation Maturity Survey (Mar. 7, 2024), p. 352.

² [PacifiCorp’s 2025 WMP Update Rev 1 redline](https://efiling.energy.ca.gov/eFiling/Getfile.aspx?fileid=57396&shareable=true) (Sep. 20, 2024), p. 20 (https://efiling.energy.ca.gov/eFiling/Getfile.aspx?fileid=57396&shareable=true, accessed Oct. 7, 2024).

³ PacifiCorp’s 2024 Wildfire Mitigation Maturity Survey (Mar. 7, 2024), p. 355.

⁴ [PacifiCorp’s 2025 WMP Update Rev 1 redline](https://efiling.energy.ca.gov/eFiling/Getfile.aspx?fileid=57396&shareable=true) (Sep. 20, 2024), p. 20 (https://efiling.energy.ca.gov/eFiling/Getfile.aspx?fileid=57396&shareable=true, accessed Oct. 7, 2024)

Q03. Regarding changes in Maturity Survey responses between the 2023 and 2024 surveys – Section 4.2.1:

In its 2024 survey response to question 4.2.1.Q4, PacifiCorp responded “No” for 2025 and 2026. However, in its 2023 survey response to the same question, PacifiCorp responded “Yes.” Similarly, in its 2024 survey response to question 4.2.1.Q5, PacifiCorp responded “No” for 2026, despite having responded “Yes” in its 2023 survey response.⁵

- a. Provide details as to why the responses to these questions changed from “Yes” in the 2023 survey to “No” in the 2024 survey.
- b. Describe PacifiCorp’s process beyond what is currently stated in its WMP (e.g., “PacifiCorp sequences distribution circuits to be inspected, while considering factors including HFRA, HFTD 2 or 3 Tier, when last scheduled work took place, knowledge of tree conditions, predominant species/growth rate, environmental factors”⁶) for determining inspection frequency.
- c. Is any part of the HFTD inspected at least twice per year? If so, what factors determine the need for those areas to be inspected more than once per year?

Q04. Regarding changes in Maturity Survey responses between the 2023 and 2024 surveys – Section 4.2.3:

In its 2024 survey responses to questions regarding frequency of subject matter expert assessment of vegetation inspections (4.2.3.Q1, Q3, and Q4), PacifiCorp responded “No” for 2024, 2025, and 2026. However, in its 2023 survey responses to the same questions, PacifiCorp responded “Yes” for 2023, 2024, 2025, and 2026.⁷

- a. Provide details as to why PacifiCorp’s responses to these questions changed from “Yes” in the 2023 survey to “No” for the 2024 survey.
- b. Was PacifiCorp previously having a subject matter expert assess vegetation inspections at least annually?
 - i. If yes, why did an at least annual inspection stop?
 - ii. If no, why did PacifiCorp’s previous responses indicate yes?
- c. If subject matter experts are still assessing vegetation inspections, clarify the frequency.
 - i. If not, describe any other review/assessment of vegetation inspections and their frequency.

⁵ PacifiCorp’s 2024 Wildfire Mitigation Maturity Survey (Mar. 7, 2024), p. 360.

⁶ [PacifiCorp’s 2023-2025 Base WMP R5 redline](#) (Sep. 20, 2024), p. 230

(<https://efiling.energy.ca.gov/eFiling/Getfile.aspx?fileid=57394&shareable=true>, accessed Oct. 7, 2024).

⁷ PacifiCorp’s 2024 Wildfire Mitigation Maturity Survey (Mar. 7, 2024), p. 366.

Q05. Regarding changes in Maturity Survey responses between the 2023 and 2024 surveys – Section 4.2.4 and 4.3.4:

In its 2024 survey responses to questions regarding risk reduction and prioritization (4.2.4.Q1, Q2, and Q3; and 4.3.4.Q1), PacifiCorp responded “No,” for 2024, 2025, and 2026. However, in its 2023 survey response to the same questions, PacifiCorp responded “Yes” for 2024, 2025, and 2026 for 4.2.4.Q1; for 2025 and 2026 for 4.2.4.Q2; for 2026 for 4.2.4.Q3; and for 2025 and 2026 for 4.3.4.Q1.⁸

- a. Provide details as to why the responses to the indicated questions changed from “Yes” in the 2023 survey to “No” in the 2024 survey. Specifically:
 - i. Did PacifiCorp previously use risk buy-down estimates to prioritize inspection programs and frequency, to plan vegetation treatment, or to estimate the risk buy-down of inspections or initiatives?
 1. If yes, why did this risk buy-down estimate stop?
 2. If no, why did PacifiCorp’s 2023 responses indicate yes?
- b. Does PacifiCorp have any procedures in place for prioritizing certain areas/circuits within the HFTD or prioritizing certain inspection programs?
 - i. If yes, describe these processes/procedures.
 - ii. If no, does PacifiCorp have plans to develop any such processes/procedures?
- c. How does PacifiCorp plan vegetation treatment if not based on risk buy-down estimates?

Q06. Regarding changes in Maturity Survey responses between the 2023 and 2024 surveys – Section 4.3.2

In its 2024 survey responses to questions 4.3.2.Q3 and 4.3.2.Q4, PacifiCorp responded greater than 30 days and less than or equal to 7 days, respectively, for 2024, 2025, and 2026. However, in its 2023 survey response to the same questions, PacifiCorp responded with shorter response times.⁹

- a. Provide details as to why PacifiCorp’s responses to these questions changed. Specifically:
 - i. Did PacifiCorp previously respond to inspection findings more quickly than it currently anticipates it will for the future?
 1. If yes, why will response times increase?
 2. If no, why did PacifiCorp’s 2023 survey responses indicate shorter response times?
- b. Describe any plans PacifiCorp has to reduce response time to inspection findings.

⁸ PacifiCorp’s 2024 Wildfire Mitigation Maturity Survey (Mar. 7, 2024), pp. 368, 378.

⁹ PacifiCorp’s 2024 Wildfire Mitigation Maturity Survey (Mar. 7, 2024), p. 373.

Q07. Regarding changes in Maturity Survey responses between the 2023 and 2024 surveys – Section 4.3.3

In its 2024 survey responses to question 4.3.3.Q4, PacifiCorp responded “No” for 2024, 2025, and 2026. However, in its 2023 survey response to the same question, PacifiCorp responded “Yes” for all years.¹⁰

- a. Provide details as to why the responses to this question changed from the 2023 survey to the 2024 survey. Specifically:
 - i. Did PacifiCorp previously have plans to update procedures based on deficiencies identified from QA/QC information at least annually?
 1. If yes, why did these plans change?
 2. If no, why did PacifiCorp’s 2023 survey responses indicate yes?
- b. What processes, if any, does PacifiCorp have in place for updating inspection procedures, if not based on QA/QC information?
- c. How does PacifiCorp use QA/QC information if not for updating inspection procedures?

Q08. Requirement for Type 2 Changes to Approved Targets, Objectives, and Expenditures

The 2025 WMP Update Guidelines, Type 2 Changes to Approved Targets, Objectives, and Expenditures,¹¹ require that “Each change must be justified by lessons learned, internal policy changes, new laws or regulations, corrective actions resulting from Energy Safety’s compliance process, or other explanations for the change.” For every Type 2 update requested in PacifiCorp’s 2025 WMP Update,¹² specify which justification it falls into. PacifiCorp may provide additional explanatory text for each requested update if desired.

- a. Lessons learned;
- b. Internal policy changes;
- c. New laws or regulations;
- d. Corrective actions resulting from Energy Safety’s compliance process, or
- e. Other.

¹⁰ PacifiCorp’s 2024 Wildfire Mitigation Maturity Survey (Mar. 7, 2024), p. 376.

¹¹ [2025 WMP Update Guidelines](#), p. 13

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56254&shareable=true>, accessed Oct. 10, 2024).

¹² [PacifiCorp 2025 WMP Update R1 \(redlined\)](#) (Sep. 20, 2024), pp. 16-23

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57396&shareable=true>, accessed Oct. 10, 2024).

Q09. Smoke and Air Quality Sensors (ID# SA-03) Discrepancies and Discontinued Program

- a. In PacifiCorp’s 2025 WMP Update R1, Table PAC 4-1 and the accompanying text state that the Smoke and Air Quality Sensors initiative (ID# SA-03) is a discontinued program.¹³ PacifiCorp’s 2023-2025 Base WMP R5 Table 8-21 shows an “Ending in 2024” completion date. Section 8.3.1.2 “Targets,” shows SA-03 to have a target of 20 sensors for 2023.¹⁴ In Section 8.3.4.1 “Existing Ignition Detection Sensors and Systems” the text for SA-03 states that, “The technology is still being developed and is not currently at a stage for implementation. The current installed sensor will be removed, and the program will not continue further.”¹⁵
 - i. What date did the Smoke and Air Quality Sensors program (ID# SA-03) end?
 - ii. How many sensors were deployed in 2023?
 - iii. How many sensors were deployed in 2024?
 - iv. How many sensors have been removed through September 2024?
 - v. Why did PacifiCorp not provide a reportable update for SA-03 in Table PAC 2-2 “Changes to Initiative Objectives from Forecasted Completion Date” given that PacifiCorp changed the objective’s completion date?

END OF REQUEST

¹³ [PacifiCorp 2025 WMP Update R1 \(redlined\)](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57396&shareable=true) (Sep. 20, 2024), pp. 24-25 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57396&shareable=true, accessed Oct. 14, 2024).

¹⁴ [PacifiCorp’s 2023-2025 Base WMP R5 redline](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57394&shareable=true) (Sep. 20, 2024), pp. 251- 252 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57394&shareable=true, accessed Oct. 14, 2024).

¹⁵ [PacifiCorp’s 2023-2025 Base WMP R5 redline](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57394&shareable=true) (Sep. 20, 2024), p. 260 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57394&shareable=true, accessed Oct. 14, 2024).