



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, November 1, 2024

Response Due: Wednesday, November 6, 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-08

Subject(s):

- Q01. Regarding Projected Expenditure Changes for Inspections
- Q02. Regarding Projected Expenditures for Emergency Preparedness Plan
- Q03. Regarding Projected Expenditures for Engagement with Access and Functional Needs Populations
- Q04. Regarding PacifiCorp's Enterprise System for Risk Assessment (ID#RA-04)
- Q05. Regarding Asset inspection Condition Codes

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. Ethan Campos (Ethan.Campos@energysafety.ca.gov)
 - e. Jessica McHale (Jessica.McHale@energysafety.ca.gov)
 - f. Andie Biggs (andie.biggs@energysafety.ca.gov)

REQUEST

Q01. Regarding Projected Expenditure Changes for Inspections:

- a. In PacifiCorp’s 2025 WMP Update R1, “Table PAC 2-3 Changes in Expenditures,” PacifiCorp reduced its 2025 projected expenditures for transmission intrusive pole inspection (ID# AI-05) from \$171,000 to \$64,000. The justification provided for this update is that the projected number of units to be inspected was reduced from the original projection.¹ However, in “Table PAC 2-1 Changes in Targets or Target Completion Dates,” PacifiCorp increased its target for AI-05 from 960 to 1,257, with a justification of “the updated value is due to the inspection cycle and what poles are identified to be completed.”² Provide:
 - i. “The projected units to be inspected”³ used to inform 2025 expenditure projections for AI-05 as of May 8, 2023 (the date PacifiCorp submitted its 2023-2025 Base WMP).
 1. If the projected units to be inspected used to inform expenditure projections as of May 8, 2023, differs from the approved target in PacifiCorp’s 2023-2025 Base WMP R2,⁴ explain why.
 - ii. The projected 2025 units to be inspected used to inform expenditure projections for AI-05 as of September 20, 2024.
 - iii. Provide the same information requested in Q1.a.i and ii for AI-03, transmission detailed inspections.
 - iv. Provide the same information requested in Q1.a.i and ii for AI-06, distribution intrusive pole inspections.
 - v. Explanation of why the projected expenditure for transmission intrusive pole inspections for 2025 was reduced from the original projection while the target for transmission intrusive pole inspections increased.
 - vi. Explanation of why the projected expenditure of transmission detailed inspections for 2025 was reduced from the original projection while the target for transmission detailed inspection remained unchanged.
 - vii. Explanation of why the projected expenditure of distribution intrusive pole inspections increased from the original projection while the target for distribution intrusive pole inspections remained unchanged.

¹ [PacifiCorp 2025 WMP Update R1 \(redline\)](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57396&shareable=true) (Sep. 20, 2024), pp. 21-22 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57396&shareable=true, accessed Oct. 30, 2024).

² [PacifiCorp 2025 WMP Update R1 \(redline\)](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57396&shareable=true) (Sep. 20, 2024), pp. 17-18 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57396&shareable=true, accessed Oct. 30, 2024).

³ [PacifiCorp 2025 WMP Update R1 \(redline\)](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57396&shareable=true) (Sep. 20, 2024), p. 22 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57396&shareable=true, accessed Nov. 1, 2024).

⁴ [PacifiCorp 2023-2025 Base WMP R2](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56336&shareable=true) (Feb. 22, 2024), p. 136 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56336&shareable=true, accessed Oct. 30, 2024).

Q02. Regarding Projected Expenditures for Emergency Preparedness Plan:

- a. In its 2025 WMP Update R1, PacifiCorp increased its 2025 projected expenditures for its emergency preparedness plan (ID# EP-01) from \$50,000 to \$320,000 and stated that this is due to including expenditures for its entire emergency management team where only a partial employee was previously forecasted.⁵
 - i. For each PacifiCorp emergency management employee that falls under its forecasted emergency preparedness plan expenditures (per PacifiCorp’s 2025 WMP Update R1), provide the position title and a description of their role(s).
 - ii. If applicable, provide information on any training emergency management employees are required to undergo in 2025 as part of PacifiCorp’s emergency preparedness plan initiative (e.g., training programs, emergency management certification, training frequency, etc.).
 - iii. If there are other uses of the increased 2025 projected expenditures for PacifiCorp’s emergency preparedness plan that its emergency management team will utilize, please describe.

Q03. Regarding Projected Expenditures for Engagement with Access and Functional Needs Populations:

- a. In its 2025 WMP Update R1, PacifiCorp increased its 2025 projected expenditures for its engagement with access and functional needs populations initiative (ID# CO-02) from \$0 to \$4,000. PacifiCorp stated that the increase is for targeted outreach initiatives to inform customers of specific programs available to them as well as eligibility requirements.⁶
 - i. Explain and provide all targeted outreach initiatives PacifiCorp is planning and/or currently implementing as part of this program and its increased projected expenditures.

Q04. Regarding PacifiCorp’s Enterprise System for Risk Assessment (ID# RA-04)

- a. In PacifiCorp’s 2025 WMP Update R1, PacifiCorp requested to discontinue its program relating to the implementation of its fire incident tracking database under its Enterprise System for Risk Assessment initiative. PacifiCorp stated that, “This initiative was implemented, and employees are receiving updated training, by the end of Q2 2024.”⁷

⁵ [PacifiCorp 2025 WMP Update R1 \(redline\)](#) (Sep. 20, 2024), pp. 21-22
(<https://efiling.energy.ca.gov/eFiling/Getfile.aspx?fileid=57396&shareable=true>, accessed Oct. 29, 2024).

⁶ [PacifiCorp 2025 WMP Update R1 \(redlined\)](#) (Sep. 20, 2024), pp. 21-22
(<https://efiling.energy.ca.gov/eFiling/Getfile.aspx?fileid=57396&shareable=true>, accessed Oct. 29, 2024).

⁷ [PacifiCorp 2025 WMP Update R1 \(redlined\)](#) (Sep. 20, 2024), p. 25
(<https://efiling.energy.ca.gov/eFiling/Getfile.aspx?fileid=57396&shareable=true>, accessed Oct. 29, 2024).

- i. By “implemented,” does PacifiCorp mean that no further actions are needed for RA-04 because implementation is complete, or is it that the database described in RA-04 itself is no longer being used and therefore being discontinued?
- ii. Explain why PacifiCorp included it as a discontinued program.

Q05. Regarding Asset Inspection Condition Codes

- a. Provide Procedure 069 referenced on page 182 of PacifiCorp’s 2023-2025 Base WMP, R5.⁸

END OF REQUEST

⁸ [PacifiCorp 2023-2025 Base WMP R5 \(redline\)](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57394&shareable=true) (Sep. 20, 2024), p. 182 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57394&shareable=true, accessed Oct. 29, 2024).