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Gavin Newsom, Governor
Caroline Thomas Jacobs, Director

TRANSMITTED VIA ELECTRONIC MAIL

DATA REQUEST

Request Date: Friday, November 22, 2024

Response Due: Wednesday, November 27, 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
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Data Request Number: OEIS-P-WMP_2024-PC-09

Subject(s):

- Q01. Regarding changes in Maturity Survey responses between 2023 and 2024 surveys – Section 1.1 Statistical Weather, Climate, and Wildfire Modeling
- Q02. Regarding changes in Maturity Survey responses between 2023 and 2024 surveys – Section 1.2 Calculation of Wildfire and PSPS Risk Exposure for Societal Values
- Q03. Regarding changes in Maturity Survey responses between 2023 and 2024 surveys – Section 1.3 Calculation of Community Vulnerability to Wildfire and Public Safety Power Shutoffs
- Q04. Regarding changes in Maturity Survey responses between 2023 and 2024 surveys – Section 1.4 Calculation of Risk and Risk Components
- Q05. Regarding changes in Maturity Survey responses between 2023 and 2024 surveys – Section 1.5 Risk Event Tracking and Integration of Lessons Learned
- Q06. Regarding changes in Maturity Survey responses between 2023 and 2024 surveys – Section 1.6 Risk-Informed Wildfire Mitigation Strategy
- Q07. Regarding changes in Maturity Survey responses between 2023 and 2024 surveys – Section 2 Situational Awareness and Forecasting
- Q08. Regarding changes in Maturity Survey responses between 2023 and 2024 surveys – Section 3.1 Asset Inventory and Condition Database

- Q009. Regarding changes in Maturity Survey responses between 2023 and 2024 surveys – Section 3.2 Asset Inspections
- Q010. Regarding changes in Maturity Survey responses between 2023 and 2024 surveys – Section 3.3 Asset Maintenance and Repair
- Q011. Regarding changes in Maturity Survey responses between 2023 and 2024 surveys – Section 5.1 Protective Equipment and Device Settings
- Q012. Regarding changes in Maturity Survey responses between 2023 and 2024 surveys – Section 5.2 Incorporation of Ignition Risk Factors in Grid Control
- Q013. Regarding changes in Maturity Survey responses between 2023 and 2024 surveys – Section 5.3 PSPS Operating Model
- Q014. Regarding changes in Maturity Survey responses between 2023 and 2024 surveys – Section 5.5 Ignition Prevention and Suppression
- Q015. Regarding changes in Maturity Survey responses between 2023 and 2024 surveys – Section 6.1 Wildfire and PSPS Emergency and Disaster Preparedness Plan
- Q016. Regarding changes in Maturity Survey responses between 2023 and 2024 surveys – Section 6.3 Public Emergency Communication Strategy
- Q017. Regarding changes in Maturity Survey responses between 2023 and 2024 surveys – Section 6.5 Customer Support in Wildfire and PSPS Emergencies
- Q018. Regarding changes in Maturity Survey responses between 2023 and 2024 surveys – Section 7.3 Engagement with AFN and Socially Vulnerable Populations
- Q019. Regarding changes in Maturity Survey responses between 2023 and 2024 surveys – Section 7.4 Collaboration on Local Wildfire Mitigation Planning
- Q020. Regarding changes in Maturity Survey responses between 2023 and 2024 surveys – Section 7.5 Cooperation and Best Practice Sharing with Other Electrical Corporations
- Q021. Regarding Projected Expenditure Increase for Initiative WP-01: Wildfire Mitigation Strategy Development
- Q022. Regarding Independent Evaluator Initiative Category Reclassification

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:
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REQUEST

Q01. Regarding changes in Maturity Survey responses between 2023 and 2024 surveys – Section 1.1 Statistical Weather, Climate, and Wildfire Modeling

- a. In its 2023 survey responses to questions 1.1.2 Q9 and 1.1.2 Q10, PacifiCorp responded “Yes” for 2025. In its 2024 responses to the same questions, PacifiCorp responded “No” for 2025.
 - i. Explain why PacifiCorp changed its responses to these questions from “Yes” in the 2023 survey to “No” in the 2024 survey.
 - ii. List the outputs and inputs of the weather, climate, and wildfire models currently used by PacifiCorp.
- b. In its 2023 survey responses to questions 1.1.3 Q1, 1.1.3 Q2, 1.1.3 Q3, 1.1.3 Q4 and 1.1.3 Q5, PacifiCorp responded “Yes” for 2025. In its 2024 responses to the same questions, PacifiCorp responded “No” for 2025.
 - i. Explain why PacifiCorp changed each of its responses to these questions from “Yes” in the 2023 survey to “No” in the 2024 survey.
 - ii. Does PacifiCorp have or plan to create a database to house version-controlled risk model outputs provided by its third-party vendor?
 1. Discuss why or why not.
 2. If it does plan to create a database to house version-controlled risk model outputs provided by its third-party vendor, provide an estimated completion date for creating the database.
 - iii. Does PacifiCorp provide any model inputs to its third-party vendor’s risk model(s)?
 - iv. Is PacifiCorp informed of model inputs used in its third-party vendor’s risk model(s)?
 1. If PacifiCorp is not informed of model inputs in its third-party vendor risk models, will the information be provided upon PacifiCorp’s request?
- c. In its 2023 survey responses to questions 1.1.4 Q1, 1.1.4 Q2, and 1.1.4 Q4, PacifiCorp responded “Yes” for 2025. In its 2024 responses to the same questions, PacifiCorp responded “No” for 2025.
 - i. Explain why PacifiCorp changed each of its responses to these questions from “Yes” in the 2023 survey to “No” in the 2024 survey.
- d. In its 2023 survey responses to questions 1.1.5 Q8 and 1.1.5 Q9, PacifiCorp responded “Yes” for 2025. In its 2024 responses to the same questions, PacifiCorp responded “No” for 2025.
 - i. Explain why PacifiCorp changed each of its responses to these questions from “Yes” in the 2023 survey to “No” in the 2024 survey.

- e. In its 2023 survey responses to questions 1.1.7 Q7, and 1.1.7 Q8, PacifiCorp responded “Yes” for 2025. In its 2024 responses to the same questions, PacifiCorp responded “No” for 2025.
 - i. Explain why PacifiCorp changed each of its responses to these questions from “Yes” in the 2023 survey to “No” in the 2024 survey.
 - ii. Explain PacifiCorp’s plan to validate changes to its modeling assumptions?
- f. In its 2023 survey responses to questions 1.1.8 Q5, PacifiCorp responded “Yes” for 2025. In its 2024 responses to the same question, PacifiCorp responded “No” for 2025.
 - i. Explain why PacifiCorp changed its response to this question from “Yes” in the 2023 survey to “No” in the 2024 survey.
- g. In its 2023 survey responses to questions 1.1.9 Q1, 1.1.9 Q2, 1.1.9 Q3, and 1.1.9 Q7, PacifiCorp responded “Yes” for 2025. In its 2024 responses to the same questions, PacifiCorp responded “No” for 2025.
 - i. Explain why PacifiCorp changed each of its responses to these questions from “Yes” in the 2023 survey to “No” in the 2024 survey.
- h. In its 2023 survey responses to questions 1.1.10 Q2, 1.1.10 Q3, 1.1.10 Q5, 1.1.10 Q6, 1.1.10 Q7, 1.1.10 Q8, and 1.1.10 Q9, PacifiCorp responded “Yes” for 2025. In its 2024 responses to the same questions, PacifiCorp responded “No” for 2025.
 - i. Explain why PacifiCorp changed each of its responses to these questions from “Yes” in the 2023 survey to “No” in the 2024 survey.

**Q02. Regarding changes in Maturity Survey responses between 2023 and 2024 surveys –
Section 1.2 Calculation of Wildfire and PSPS Risk Exposure for Societal Values**

- a. In its 2023 survey responses to questions 1.2.2 Q4, 1.2.2 Q5, 1.2.2 Q10, 1.2.2 Q11, 1.2.2 Q12, and 1.2.2 Q14, PacifiCorp responded “Yes” for 2025. In its 2024 responses to the same questions, PacifiCorp responded “No” for 2025.
 - ii. Explain why PacifiCorp changed each of its responses to these questions from “Yes” in the 2023 survey to “No” in the 2024 survey.
 - iii. List the outputs and inputs of the wildfire and PSPS risk exposure models currently used by PacifiCorp.
- b. In its 2023 survey responses to questions 1.2.3 Q1, 1.2.3 Q2, 1.2.3 Q4, and 1.2.3 Q5, PacifiCorp responded “Yes” for 2025. In its 2024 responses to the same questions, PacifiCorp responded “No” for 2025.
 - i. Explain why PacifiCorp changed each of its responses to these questions from “Yes” in the 2023 survey to “No” in the 2024 survey.
 - ii. Does PacifiCorp have or plan to create a database to house version-controlled risk model outputs provided by its third-party vendor?
 - 1. Discuss why or why not.
 - 2. If so, provide an estimated completion date for the database.
 - iii. Does PacifiCorp provide any model inputs to its third-party vendor’s risk models?

- iv. If PacifiCorp only provides some or none of the model inputs to its third-party vendor's risk models, is PacifiCorp informed of all the model inputs to its third-party vendor's risk models?
 - 1. If PacifiCorp is not informed of the model inputs to its third-party vendor risk models, can the third-party vendor provide the information to PacifiCorp upon PacifiCorp's request?
- c. In its 2023 survey responses to questions 1.2.4 Q1, 1.2.4 Q2, and 1.2.4 Q3, PacifiCorp responded "Yes" for 2025. In its 2024 responses to the same questions, PacifiCorp responded "No" for 2025.
 - i. Explain why PacifiCorp changed each of its responses to these questions from "Yes" in the 2023 survey to "No" in the 2024 survey.
- d. In its 2023 survey responses to questions 1.2.6 Q5, 1.2.6 Q7, and 1.2.6 Q8, PacifiCorp responded "Yes" for 2025. In its 2024 responses to the same questions, PacifiCorp responded "No" for 2025.
 - i. Explain why PacifiCorp changed each of its responses to these questions from "Yes" in the 2023 survey to "No" in the 2024 survey.

Q03. Regarding changes in Maturity Survey responses between 2023 and 2024 surveys – Section 1.3 Calculation of Community Vulnerability to Wildfire and Public Safety Power Shutoffs

- a. In its 2023 survey responses to questions 1.3.1 Q3 and 1.3.1 Q4, PacifiCorp responded "Yes" for 2025. In its 2024 responses to the same questions, PacifiCorp responded "No" for 2025.
 - i. Explain why PacifiCorp changed each of its responses to these questions from "Yes" in the 2023 survey to "No" in the 2024 survey.
- b. In its 2023 survey responses to questions 1.3.2 Q5 and 1.3.2 Q7, PacifiCorp responded "Yes" for 2025. In its 2024 responses to the same questions, PacifiCorp responded "No" for 2025.
 - i. Explain why PacifiCorp changed each of its responses to these questions from "Yes" in the 2023 survey to "No" in the 2024 survey.
- c. In its 2023 survey responses to questions 1.3.3 Q1, 1.3.3 Q2, 1.3.3 Q3 and 1.3.3 Q5, PacifiCorp responded "Yes" for 2025. In its 2024 responses to the same questions, PacifiCorp responded "No" for 2025.
 - i. Explain why PacifiCorp changed each of its responses to these questions from "Yes" in the 2023 survey to "No" in the 2024 survey.
 - ii. Does PacifiCorp have or plan to create a database to house version-controlled community vulnerability model outputs provided by its third-party vendor?
 - 1. Discuss why or why not.
 - 2. If so, provide an estimated completion date for the database.
 - iii. Does PacifiCorp provide any model inputs to its third-party vendor's community vulnerability models?

- iv. If PacifiCorp only provides some or none of the model inputs to its third-party vendor's risk models, is PacifiCorp informed of all model inputs to its third-party vendor's community vulnerability models?
 - 1. If PacifiCorp is not informed of model inputs to its third-party vendor community vulnerability models, can the inputs be provided upon PacifiCorp's request?
- d. In its 2023 survey response to question 1.3.4 Q1, PacifiCorp responded "Yes" for 2025. In its 2024 response to the same question PacifiCorp responded "No" for 2025.
 - i. Explain why PacifiCorp changed its response to this question from "Yes" in the 2023 survey to "No" in the 2024 survey.
- e. In its 2023 survey responses to questions 1.3.6 Q2, 1.3.6 Q5, 1.3.6 Q7 and 1.3.6 Q8, PacifiCorp responded "Yes" for 2025. In its 2024 responses to the same questions, PacifiCorp responded "No" for 2025.
 - i. Explain why PacifiCorp changed each of its responses to these questions from "Yes" in the 2023 survey to "No" in the 2024 survey.

Q04. Regarding changes in Maturity Survey responses between 2023 and 2024 surveys – Section 1.4 Calculation of Risk and Risk Components

- a. In its 2023 survey responses to questions 1.4.1 Q2 and 1.4.1 Q4 PacifiCorp responded "Yes" for 2025 and 2026. In its 2024 responses to the same questions, PacifiCorp responded "No" for 2025 and 2026.
 - i. Explain why PacifiCorp changed each of its responses to these questions from "Yes" in the 2023 survey to "No" in the 2024 survey.
- b. In its 2023 survey responses to questions 1.4.2 Q2, 1.4.2 Q3, 1.4.2 Q4, 1.4.2 Q5, 1.4.2 Q6, and 1.4.2 Q7, PacifiCorp responded "Yes" for 2025 and 2026. In its 2024 responses to the same questions, PacifiCorp responded "no" for 2025 and 2026.
 - i. Explain why PacifiCorp changed each of its responses to these questions from "Yes" in the 2023 survey to "No" in the 2024 survey.
- c. In its 2023 survey responses to questions 1.4.2 Q6, and 1.4.2 Q7, PacifiCorp responded "Yes" for 2026. In its 2024 responses to the same questions, PacifiCorp responded "No" for 2026.
 - i. Explain why PacifiCorp changed each of its responses to these questions from "Yes" in the 2023 survey to "No" in the 2024 survey.
- d. In its 2023 survey responses to questions 1.4.3 Q1, 1.4.3 Q2 and 1.4.3 Q4, PacifiCorp responded "Yes" for 2025 and 2026. In its 2024 responses to the same questions, PacifiCorp responded "No" for 2025 and 2026.
 - i. Explain why PacifiCorp changed each of its responses to these questions from "Yes" in the 2023 survey to "No" in the 2024 survey.
- e. In the Maturity Survey Comment Section of Section 1.4.3, PacifiCorp commented "The FireSight wildfire risk model is owned by a third-party vendor who provides the model

outputs to PacifiCorp. The vendor has separate development and production environments that are version controlled.”

- i. Question 1 of Section 1.4.3 asked, “Are risk model inputs version controlled and maintained in the electrical corporation’s database(s)?” Given that PacifiCorp’s comment only mentioned the outputs of the FireSight model (not the inputs), explain how PacifiCorp controls and maintains the model inputs.
 - ii. Question 4 of Section 1.4.3 asked, “Are the databases of model inputs and outputs appropriately linked with each relevant electrical corporation database (assets, weather, vegetation)?” Given that PacifiCorp’s comment only mentioned the outputs of the FireSight model, explain how the inputs are linked with PacifiCorp’s database.
- f. In its 2023 survey responses to questions 1.4.4 Q1, 1.4.4 Q2, 1.4.4 Q4, and 1.4.4 Q6, PacifiCorp responded “Yes” for 2025 and 2026. In its 2024 responses to the same questions, PacifiCorp responded “no” for 2025 and 2026.
 - i. Explain why PacifiCorp changed each of its responses to these questions from “Yes” in the 2023 survey to “No” in the 2024 survey.
- g. In its 2023 survey responses to questions 1.4.5 Q10, and 1.4.5 Q11, PacifiCorp responded “Yes” for 2025 and 2026. In its 2024 responses to the same questions, PacifiCorp responded “No” for 2025 and 2026.
 - i. Explain why PacifiCorp changed each of its responses to these questions from “Yes” in the 2023 survey to “No” in the 2024 survey.
- h. In its 2023 survey responses to questions 1.4.7 Q2, 1.4.7 Q5, 1.4.7 Q7, and 1.4.7 Q8, PacifiCorp responded “Yes” for 2025 and 2026. In its 2024 responses to the same questions, PacifiCorp responded “No” for 2025 and 2026.
 - i. Explain why PacifiCorp changed each of its responses to these questions from “Yes” in the 2023 survey to “No” in the 2024 survey.
- i. In its 2023 survey response to question 1.4.7 Q3, PacifiCorp responded “Yes” for 2025. In its 2024 response to the same question, PacifiCorp responded “No” for 2025.
 - i. Explain why PacifiCorp changed its response to this question from “Yes” in the 2023 survey to “No” in the 2024 survey.
- j. In its 2023 survey responses to questions 1.4.7 Q6 and 1.4.7 Q9, PacifiCorp responded “Yes” for 2026. In its 2024 responses to the same questions, PacifiCorp responded “No” for 2026.
 - i. Explain why PacifiCorp changed each of its responses to these questions from “Yes” in the 2023 survey to “No” in the 2024 survey.
- k. In its 2023 survey responses to questions 1.4.9 Q1, 1.4.9 Q2, 1.4.9 Q7, and 1.4.9 Q9, PacifiCorp responded “Yes” for 2025 and 2026. In its 2024 responses to the same questions, PacifiCorp responded “No” for 2025 and 2026.
 - i. Explain why PacifiCorp changed each of its responses to these questions from “Yes” in the 2023 survey to “No” in the 2024 survey.

**Q05. Regarding changes in Maturity Survey responses between 2023 and 2024 surveys –
Section 1.5 Risk Event Tracking and Integration of Lessons Learned**

- a. In its 2023 survey response to question 1.5.1 Q1, PacifiCorp responded “No” for 2024. In its 2024 response to the same question, PacifiCorp responded “Yes” for 2024.
 - i. Explain why PacifiCorp changed its response to this question from “Yes” in the 2023 survey to “No” in the 2024 survey.
- b. In its 2023 survey responses to questions 1.5.1 Q2 and 1.5.1 Q3, PacifiCorp responded “Yes” for 2025 and 2026. In its 2024 responses to the same questions, PacifiCorp responded “no” for 2025 and 2026.
 - i. Explain why PacifiCorp changed each of its responses to these questions from “Yes” in the 2023 survey to “No” in the 2024 survey.
- c. In its 2023 survey responses to question 1.5.2 Q2, PacifiCorp responded “Yes” for 2025 and 2026. In its 2024 responses to the same question, PacifiCorp responded “No” for 2025 and 2026.
 - i. Explain why PacifiCorp changed its response to this question from “Yes” in the 2023 survey to “No” in the 2024 survey.
 - ii. Question 1.5.2 Q2 asked “Are wildfire- and PSPS-related risk events formally tracked in the electrical corporation corrective action program?” Explain why wildfire- and PSPS-related risk events are not formally tracked in the electrical corporation corrective action program.
- d. In its 2023 survey responses to question 1.5.3 Q3, PacifiCorp responded “Yes” for 2025 and 2026. In its 2024 responses to the same question, PacifiCorp responded “No” for 2025 and 2026.
 - i. Explain why PacifiCorp changed its response to this question from “Yes” in the 2023 survey to “No” in the 2024 survey.
 - ii. Question 1.5.3 Q3 asked “Are actions to prevent recurrence formally documented and tracked within the electrical corporation’s WMP?” Explain why these actions are not tracked within the electrical corporation’s WMP.
- e. In its 2023 survey responses to questions 1.4.7 Q6 and 1.4.7 Q9, PacifiCorp responded “Yes” for 2026. In its 2024 responses to the same questions, PacifiCorp responded “No” for 2026.
 - i. Explain why PacifiCorp changed each of its responses to these questions from “Yes” in the 2023 survey to “No” in the 2024 survey.
- f. In its 2023 survey responses to question 1.5.3 Q1 PacifiCorp responded “2 (within one year) and 4 (within one quarter)” for 2025 and 2026 respectively. In its 2024 responses to the same question, PacifiCorp responded “1 (never) and 2 (at least annually) for 2025 and 2026, respectively.
 - i. Explain why PacifiCorp changed each of its responses to these questions in the 2024 survey.
- g. In its 2023 survey responses to question 1.5.4 Q4, PacifiCorp responded “Yes” for 2025 and 2026. In its 2024 responses to the same question, PacifiCorp responded “No” for 2025 and 2026.

- i. Explain why PacifiCorp changed its responses to this question from “Yes” in the 2023 survey to “No” in the 2024 survey.
- h. In its 2023 survey responses to questions 1.5.5 Q1, 1.5.5 Q2, and 1.5.5 Q3 PacifiCorp responded “Yes” for 2025 and 2026. In its 2024 responses to the same questions, PacifiCorp responded “No” for 2025 and 2026.
 - i. Explain why PacifiCorp changed each of its responses to these questions from “Yes” in the 2023 survey to “No” in the 2024 survey.
- i. In its 2023 survey responses to questions 1.5.6 Q1, 1.5.6 Q2, 1.5.6 Q3, and 1.5.6 Q4, PacifiCorp responded “Yes” for 2025 and 2026. In its 2024 responses to the same questions, PacifiCorp responded “No” for 2025 and 2026.
 - i. Explain why PacifiCorp changed each of its responses to these questions from “Yes” in the 2023 survey to “No” in the 2024 survey.

Q06. Regarding changes in Maturity Survey responses between 2023 and 2024 surveys – Section 1.6 Risk-Informed Wildfire Mitigation Strategy

- a. In its 2023 survey responses to questions 1.6.1 Q1, 1.6.1 Q3, and 1.6.1 Q7, PacifiCorp responded “Yes” for 2025 and 2026. In its 2024 responses to the same questions, PacifiCorp responded “No” for 2025 and 2026.
 - i. Explain why PacifiCorp changed each of its responses to these questions from “Yes” in the 2023 survey to “No” in the 2024 survey.
- b. In its 2023 survey responses to questions 1.6.1 Q5, 1.6.1 Q6, and 1.6.1 Q8, PacifiCorp responded “Yes” for 2026. In its 2024 responses to the same questions, PacifiCorp responded “No” for 2026.
 - i. Explain why PacifiCorp changed each of its responses to these questions from “Yes” in the 2023 survey to “No” in the 2024 survey.
- c. In its 2023 survey responses to questions 1.6.2 Q4, 1.6.2 Q5, and 1.6.2 Q6, PacifiCorp responded “Yes” for 2025 and 2026. In its 2024 responses to the same questions, PacifiCorp responded “No” for 2025 and 2026.
 - i. Explain why PacifiCorp changed each of its responses to these questions from “Yes” in the 2023 survey to “No” in the 2024 survey.
- d. In its 2023 survey responses to question 1.6.3 Q1 PacifiCorp responded “2 (at least annually) and 3 (twice per year)” for 2025 and 2026 respectively. In its 2024 responses to the same question, PacifiCorp responded “2 (at least annually) for 2025 and 2026.”
 - i. Explain why PacifiCorp changed its responses to this question in the 2024 survey.
- e. In its 2023 survey responses to questions 1.6.4 Q1, 1.6.4 Q2, 1.6.4 Q3, and 1.6.4 Q4, PacifiCorp responded “Yes” for 2025 and 2026. In its 2024 responses to the same questions, PacifiCorp responded “No” for 2025 and 2026.
 - i. Explain why PacifiCorp changed each of its responses to these questions from “Yes” in the 2023 survey to “No” in the 2024 survey.

- f. In its 2023 survey responses to questions 1.6.5 Q2, 1.6.5 Q4, 1.6.5 Q5, 1.6.5 Q6, and 1.6.5 Q8 PacifiCorp responded “Yes” for 2025 and 2026. In its 2024 responses to the same questions, PacifiCorp responded “No” for 2025 and 2026.
 - i. Explain why PacifiCorp changed each of its responses to these questions from “Yes” in the 2023 survey to “No” in the 2024 survey.
- g. In its 2023 survey response to question 1.6.5 Q7, PacifiCorp responded “No” for 2025. In its 2024 response to the same question, PacifiCorp responded “Yes” for 2025.
 - i. Explain why PacifiCorp changed its response to this question from “No” in the 2023 survey to “Yes” in the 2024 survey.
- h. In its 2023 survey response to question 1.6.7 Q1, PacifiCorp responded “Yes” for 2025. In its 2024 response to the same question, PacifiCorp responded “No” for 2025.
 - i. Explain why PacifiCorp changed its response to this question from “Yes” in the 2023 survey to “No” in the 2024 survey.
- i. In its 2023 survey responses to questions 1.6.7 Q2, 1.6.7 Q4, 1.6.7 Q5, 1.6.7 Q7, and 1.6.7 Q8, PacifiCorp responded “Yes” for 2025 and 2026. In its 2024 responses to the same questions, PacifiCorp responded “No” for 2025 and 2026.
 - i. Explain why PacifiCorp changed each of its responses to these questions from “Yes” in the 2023 survey to “No” in the 2024 survey.
- j. In its 2023 survey responses to questions 1.6.8 Q2, 1.6.8 Q3, 1.6.8 Q5, 1.6.8 Q6, and 1.6.8 Q7, PacifiCorp responded “Yes” for 2025 and 2026. In its 2024 responses to the same questions, PacifiCorp responded “No” for 2025 and 2026.
 - i. Explain why PacifiCorp changed each of its responses to these questions from “Yes” in the 2023 survey to “No” in the 2024 survey.
- k. In its 2023 survey response to question 1.6.8 Q4, PacifiCorp responded “Yes” for 2025. In its 2024 response to the same question, PacifiCorp responded “No” for 2025.
 - i. Explain why PacifiCorp changed its response to this question from “Yes” in the 2023 survey to “No” in the 2024 survey.

**Q07. Regarding changes in Maturity Survey responses between 2023 and 2024 surveys –
Section 2 Situational Awareness and Forecasting**

- a. In its 2023 survey responses to question 2.1.1 Q6, PacifiCorp responded “Yes” for 2025 and 2026. In its 2024 responses to the same question, PacifiCorp responded “No” for 2025 and 2026.
 - i. Explain why PacifiCorp changed each of its responses to this question from “Yes” in the 2023 survey to “No” in the 2024 survey.
- b. In its 2023 survey responses to question 2.2.5 Q5, PacifiCorp responded “Yes” for 2025 and 2026. In its 2024 responses to the same question, PacifiCorp responded “No” for 2025 and 2026.
 - i. Explain why PacifiCorp changed each of its responses to this question from “Yes” in the 2023 survey to “No” in the 2024 survey.

- ii. Will PacifiCorp begin implementing the usage of ensemble weather forecasting (using varying initial conditions in which one is the control forecast) after Jan 1, 2026?

Q08. Regarding changes in Maturity Survey responses between 2023 and 2024 surveys – Section 3.1 Asset Inventory and Condition Database

- a. In its 2023 survey responses to question 3.1.1 Q1, PacifiCorp responded “Yes” for 2025 and 2026. However, in its 2024 survey responses to the same question, PacifiCorp responded “No.”
 - i. Explain why PacifiCorp changed its responses to this question from “Yes” in the 2023 survey to “No” in the 2024 survey.
- b. In its 2023 survey responses to question 3.1.1 Q2, PacifiCorp responded that it would update its database weekly in 2025 and daily in 2026. In its 2024 survey responses to the same question, PacifiCorp responded that it would update the database monthly in 2025 and 2026. PacifiCorp stated that this response changed due to a “business transformation delay.”
 - i. Describe the business transformation delay, including the replaced and replacement technologies.
 - ii. Provide the expected completion date of the business transformation.
 - iii. Provide the expected frequency that the database will be updated once the business transformation is complete.
- c. In its 2023 survey response to question 3.1.1 Q3, PacifiCorp responded that it would incorporate asset inspection findings into its database within one day in 2026. In its 2024 survey response to the same question, PacifiCorp responded that it would incorporate inspection findings within one week in 2026.
 - i. Explain why PacifiCorp changed its response to this question from one day in the 2023 survey to one week in the 2024 survey.
- d. In its 2023 survey responses to question 3.1.2 Q1, PC responded “Yes” for 2025 and 2026. However, in its 2024 survey responses to the same question, PC responded “No.” PacifiCorp stated that this response changed due to a “business transformation delay.”
 - i. Will PacifiCorp’s database contain the information listed in question 3.1.2 Q1 after the business transformation is complete?
- e. In its 2023 survey responses to question 3.1.2 Q3, PacifiCorp responded “Yes” for 2025 and 2026. However, in its 2024 survey responses to the same question, PacifiCorp responded “No.”
 - i. Explain why PacifiCorp changed its responses to this question from “Yes” in the 2023 survey to “No” in the 2024 survey. What business processes, if any, changed for PacifiCorp to provide a different response for 2024?

- ii. Does the database contain the overload history for each piece of equipment in the service territory through which current passes? If not, list the equipment and/or circumstances for which the overload history is not recorded.
- f. In its 2023 survey response to question 3.1.2 Q7, PC responded that at least 90 percent of its assets and components would have age data in 2025 and 2026. In its 2024 response to the same question, PC responded that less than 80 percent of its assets would contain age data in 2025 and 2026.
 - i. Explain why PacifiCorp changed its response to this question. What business processes, if any, changed for PacifiCorp to provide a different response for 2024?
 - ii. What percentage of assets and components does PacifiCorp have age data for?
 - iii. List the assets or components PacifiCorp does not track age data for (i.e., poles, splices, conductor, hotline clamps.)
 - iv. List the assets and components PacifiCorp does track age data for.
 - v. Does PacifiCorp expect to increase the percentage of assets and components it has age data for from 2024 to 2025?

Q09. Regarding changes in Maturity Survey responses between 2023 and 2024 surveys – Section 3.2 Asset Inspections

- a. In its 2023 survey response to question 3.2.2 Q2, PacifiCorp responded “Yes” for 2025. In its 2024 response to the same question, PacifiCorp responded “No.”
 - i. Explain why PacifiCorp changed its response to this question from “Yes” in the 2023 survey to “No” in the 2024 survey.
 - ii. How does PacifiCorp calculate equipment failure probability? Please provide an example calculation for a distribution pole in a high-risk circuit, an expulsion fuse in a medium-risk circuit, and a transformer in a low-risk circuit.
- b. In its 2023 survey response to question 3.2.2 Q3, PacifiCorp responded “Yes” for 2025. In its 2024 response to the same question, PacifiCorp responded “No.”
 - i. Explain why PacifiCorp changed its response to this question from “Yes” in the 2023 survey to “No” in the 2024 survey.

Q010. Regarding changes in Maturity Survey responses between 2023 and 2024 surveys – Section 3.3 Asset Maintenance and Repair

- a. In its 2023 survey response to question 3.3.3 Q4, PacifiCorp responded “Yes” for 2025. In its 2024 response to the same question, PacifiCorp responded “No.”
 - i. Explain why PacifiCorp changed its response to this question from “Yes” in the 2023 survey to “No” in the 2024 survey.
 - ii. Does PacifiCorp plan to estimate equipment service life reduction based on usage and environmental conditions in the future?

- b. In its 2024 survey response to question 3.3.3 Q5, PacifiCorp responded “Yes” for 2025. In its 2024 response to the same question, PacifiCorp responded “No.”
 - i. Explain why PacifiCorp changed its response to this question from “Yes” in the 2023 survey to “No” in the 2024 survey.
- c. In its 2024 survey response to question 3.3.3 Q6, PacifiCorp responded “Yes” for 2025. In its 2024 response to the same question, PacifiCorp responded “No.”
 - i. Explain why PacifiCorp changed its response to this question from “Yes” in the 2023 survey to “No” in the 2024 survey.
- d. In its 2024 survey response to question 3.3.4 Q4, PacifiCorp responded “Yes” for 2025. In its 2024 response to the same question, PacifiCorp responded “No.”
 - i. Explain why PacifiCorp changed its response to this question from “Yes” in the 2023 survey to “No” in the 2024 survey.
- e. In its 2024 survey response to question 3.3.4 Q5, PacifiCorp responded “Yes” for 2025. In its 2024 response to the same question, PacifiCorp responded “No.”
 - i. Explain why PacifiCorp changed its response to this question from “Yes” in the 2023 survey to “No” in the 2024 survey.

**Q011. Regarding changes in Maturity Survey responses between 2023 and 2024 surveys –
Section 5.1 Protective Equipment and Device Settings**

- a. In its 2023 survey responses to questions 5.1.1 Q1, 5.1.1 Q2, 5.1.1 Q3, 5.1.1 Q4 and 5.1.1 Q5, PacifiCorp responded “Yes” for 2025. In its 2024 responses to the same questions, PacifiCorp responded “No.”
 - i. Explain why PacifiCorp changed each of its responses to these questions from “Yes” in the 2023 survey to “No” in the 2024 survey.
- b. In its 2023 survey responses to questions 5.1.2 Q2, 5.1.2 Q3, and 5.1.2 Q5, PacifiCorp responded “Yes” for 2025. In its 2024 responses to the same questions, PacifiCorp responded “No.”
 - i. Explain why PacifiCorp changed each of its responses to these questions from “Yes” in the 2023 survey to “No” in the 2024 survey.
- c. In its 2023 survey response to question 5.1.3 Q3, PacifiCorp responded “Yes” for 2025. In its 2024 response to the same question, PacifiCorp responded “No.”
 - i. Explain why PacifiCorp changed its response to this question from “Yes” in the 2023 survey to “No” in the 2024 survey.

**Q012. Regarding changes in Maturity Survey responses between 2023 and 2024 surveys –
Section 5.2 Incorporation of Ignition Risk Factors in Grid Control**

- a. In its 2023 survey response to question 5.2.1 Q1, PacifiCorp responded “Yes” for 2025. In its 2024 response to the same question, PacifiCorp responded “No.”
 - i. Explain why PacifiCorp changed its response to this question from “Yes” in the 2023 survey to “No” in the 2024 survey.

- b. In its 2023 survey responses to questions 5.2.2 Q1 and 5.2.2 Q2, PacifiCorp responded “Yes” for 2025. In its 2024 responses to the same questions, PacifiCorp responded “No.”
 - i. Explain why PacifiCorp changed each of its responses to these questions from “Yes” in the 2023 survey to “No” in the 2024 survey.
- c. In its 2023 survey response to questions 5.2.3 Q2, 5.2.3 Q3, and 5.2.3 Q4, PacifiCorp responded “Yes” for 2025. In its 2024 response to the same questions, PacifiCorp responded “No.”
 - i. Explain why PacifiCorp changed each of its responses to these questions from “Yes” in the 2023 survey to “No” in the 2024 survey.
- d. In its 2023 survey response to question 5.2.5 Q2, PacifiCorp responded “Yes” for 2025. In its 2024 response to the same question, PacifiCorp responded “No.”
 - i. Explain why PacifiCorp changed its response to this question from “Yes” in the 2023 survey to “No” in the 2024 survey.

Q013. Regarding changes in Maturity Survey responses between 2023 and 2024 surveys – Section 5.3 PSPS Operating Model

- a. In its 2023 survey response to question 5.3.2 Q4, PacifiCorp responded “Yes” for 2025. In its 2024 response to the same question, PacifiCorp responded “No.”
 - i. Explain why PacifiCorp changed its response to this question from “Yes” in the 2023 survey to “No” in the 2024 survey.

Q014. Regarding changes in Maturity Survey responses between 2023 and 2024 surveys – Section 5.5 Ignition Prevention and Suppression

- a. In its 2023 survey responses to questions 5.5.1 Q1, 5.5.1 Q4, and 5.5.1 Q5, PacifiCorp responded “Yes” for 2025. In its 2024 responses to the same questions, PacifiCorp responded “No.”
 - i. Explain why PacifiCorp changed each of its responses to these questions from “Yes” in the 2023 survey to “No” in the 2024 survey.

Q015. Regarding changes in Maturity Survey responses between 2023 and 2024 surveys – Section 6.1 Wildfire and PSPS Emergency and Disaster Preparedness Plan

- a. In its 2023 survey responses to question 6.1.1 Q7, PacifiCorp responded “Yes” for 2025 and 2026. In its 2024 responses to the same question, PacifiCorp responded “No.”
 - i. Explain why PacifiCorp changed its responses to this question from “Yes” in the 2023 survey to “No” in the 2024 survey.
- b. In its 2023 survey response to question 6.1.4 Q2, PacifiCorp responded “Yes” for 2025. In its 2024 response to the same question, PacifiCorp responded “No.”

- i. Explain why PacifiCorp changed its response to this question from “Yes” in the 2023 survey to “No” in the 2024 survey.

**Q016. Regarding changes in Maturity Survey responses between 2023 and 2024 surveys –
Section 6.3 Public Emergency Communication Strategy**

- a. In its 2023 survey responses to question 6.3.1 Q3, PacifiCorp responded “Yes” for 2024, 2025, and 2026. In its 2024 responses to the same question, PacifiCorp responded “No.”
 - i. Explain why PacifiCorp changed each of its responses to this question from “Yes” in the 2023 survey to “No” in the 2024 survey.
- b. In its 2023 survey responses to question 6.3.4 Q6, PacifiCorp responded “Yes” for 2025 and 2026. In its 2024 responses to the same question, PacifiCorp responded “No.”
 - i. Explain why PacifiCorp changed each of its responses to this question from “Yes” in the 2023 survey to “No” in the 2024 survey.
- c. In its 2023 survey responses to question 6.3.4 Q14, PacifiCorp responded “Yes” for 2025 and 2026. In its 2024 responses to the same question, PacifiCorp responded “No.”
 - i. Explain why PacifiCorp changed each of its responses to this question from “Yes” in the 2023 survey to “No” in the 2024 survey.
- d. In its 2023 survey responses to question 6.3.4 Q16, PacifiCorp responded “Yes” for 2025 and 2026. In its 2024 responses to the same question, PacifiCorp responded “No.”
 - i. Explain why PacifiCorp changed each of its responses to this question from “Yes” in the 2023 survey to “No” in the 2024 survey.

**Q017. Regarding changes in Maturity Survey responses between 2023 and 2024 surveys –
Section 6.5 Customer Support in Wildfire and PSPS Emergencies**

- a. In its 2023 survey responses to question 6.5.1 Q12, PacifiCorp responded “Yes” for 2024, 2025, and 2026. In its 2024 responses to the same question, PacifiCorp responded “No.”
 - i. Explain why PacifiCorp changed each of its responses to this question from “Yes” in the 2023 survey to “No” in the 2024 survey.

**Q018. Regarding changes in Maturity Survey responses between 2023 and 2024 surveys –
Section 7.3 Engagement with AFN and Socially Vulnerable Populations**

- a. In its 2023 survey responses to question 7.3.1 Q7, PacifiCorp responded “Yes” for 2024, 2025, and 2026. In its 2024 responses to the same question, PacifiCorp responded “No.”

- i. Explain why PacifiCorp changed each of its responses to this question from “Yes” in the 2023 survey to “No” in the 2024 survey.

**Q019. Regarding changes in Maturity Survey responses between 2023 and 2024 surveys –
Section 7.4 Collaboration on Local Wildfire Mitigation Planning**

- a. In its 2023 survey responses to question 7.4.1 Q5, PacifiCorp responded “Yes” for 2024, 2025, and 2026. In its 2024 responses to the same question, PacifiCorp responded “No.”
 - i. Explain why PacifiCorp changed each of its responses to this question from “Yes” in the 2023 survey to “No” in the 2024 survey.
- b. In its 2023 survey responses to question 7.4.1 Q6, PacifiCorp responded “Yes” for 2024, 2025, and 2026. In its 2024 responses to the same question, PacifiCorp responded “No.”
 - i. Explain why PacifiCorp changed each of its responses to this question from “Yes” in the 2023 survey to “No” in the 2024 survey.
- c. In its 2023 survey responses to question 7.4.1 Q7, PacifiCorp responded “Yes” for 2025 and 2026. In its 2024 responses to the same question, PacifiCorp responded “No.”
 - i. Explain why PacifiCorp changed each of its responses to this question from “Yes” in the 2023 survey to “No” in the 2024 survey.
- d. In its 2023 survey responses to question 7.4.1 Q8, PacifiCorp responded “Yes” for 2024, 2025, and 2026. In its 2024 responses to the same question, PacifiCorp responded “No.”
 - i. Explain why PacifiCorp changed each of its responses to this question from “Yes” in the 2023 survey to “No” in the 2024 survey.

**Q020. Regarding changes in Maturity Survey responses between 2023 and 2024 surveys –
Section 7.5 Cooperation and Best Practice Sharing with Other Electrical Corporations**

- a. In its 2023 survey responses to question 7.5.1 Q5, PacifiCorp responded “Yes” for 2024, 2025, and 2026. In its 2024 responses to the same question, PacifiCorp responded “No.”
 - i. Explain why PacifiCorp changed each of its responses to this question from “Yes” in the 2023 survey to “No” in the 2024 survey.
- b. In its 2023 survey responses to question 7.5.1 Q6, PacifiCorp responded “Yes” for 2024, 2025, and 2026. In its 2024 responses to the same question, PacifiCorp responded “No.”
 - i. Explain why PacifiCorp changed each of its responses to this question from “Yes” in the 2023 survey to “No” in the 2024 survey.
- c. In its 2023 survey response to question 7.5.3 Q1, PacifiCorp responded “Yes” for 2024. In its 2024 response to the same question, PacifiCorp responded “No.”

- i. Explain why PacifiCorp changed its response to this question from “Yes” in the 2023 survey to “No” in the 2024 survey.
- d. In its 2023 survey responses to question 7.5.3 Q5, PacifiCorp responded “Yes” for 2025 and 2026. In its 2024 responses to the same question, PacifiCorp responded “No.”
 - i. Explain why PacifiCorp changed each of its responses to this question from “Yes” in the 2023 survey to “No” in the 2024 survey.

Q021. Regarding Projected Expenditure Increase for Initiative WP-01: Wildfire Mitigation Strategy Development

In Table 2-3 of PacifiCorp’s 2025 WMP Update, PacifiCorp stated that it will increase its projected expenditures for Initiative WP-01 by \$301,000 (a 55 percent increase).¹

- a. What timeframe is the \$301,000 expense estimated to cover?
 - i. Is it estimated to cover the year 2025 alone?
 - ii. Is it estimated to cover the entire cost of a multiyear contract? If so, which years is the contract estimated to cover?
- b. In previous years, what was the expense amount for the Independent Evaluator?
 - i. What was the expense in the year 2020?
 - ii. What was the expense in the year 2021?
 - iii. What was the expense in the year 2022?
 - iv. What was the expense in the year 2023?
 - v. What was the expense in the year 2024?

Q022. Regarding Independent Evaluator Initiative Category Reclassification

In its response to Data Request OEIS-P-WMP_2024-PC-02 Question 1 (vi), PacifiCorp stated that “The independent evaluator (IE) requirement came out of the passing of Assembly Bill 1054 and codified in Public Utilities Code - PUC § 8386.3 and required a qualified independent evaluator with experience to review and assess electrical corporations’ compliance with its Wildfire Mitigation Plan.”²

- a. Given that Assembly Bill 1054 became effective January 1, 2020,³ what initiative category did PacifiCorp allocate the independent evaluator expense to from 2020 through the present?

¹ [PacifiCorp 2025 WMP Update R1](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57396&shareable=true) Redline (Sep. 20, 2024), pp. 21-22 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57396&shareable=true, accessed Nov. 18, 2024).

² Data Request [OEIS-P-WMP_2024-PC-02](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57193&shareable=true), Question 1(vi) (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57193&shareable=true, accessed Nov. 18, 2024).

³ [AB-1054 Public utilities: wildfires and employee protection](https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=201920200AB1054) (https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=201920200AB1054, accessed Nov. 18, 2024).

- i. Why is PacifiCorp requesting to switch the independent evaluator cost from the aforementioned initiative category to initiative WP-01 in its 2025 WMP Update?

END OF REQUEST