



825 NE Multnomah, Suite 2000
Portland, Oregon 97232

May 24, 2022

Matthew Karle

Senior Analyst

Public Advocates Office

Matthew.Karle@cpuc.ca.gov

Carolyn Chen

Carolyn.Chen@cpuc.ca.gov

Henry Burton

Henry.Burton@cpuc.ca.gov

Natalie Monroe

Natalie.Monroe@cpuc.ca.gov

Miles Gordon

Miles.Gordon@cpuc.ca.gov

Layla Labagh

Layla.Labagh@cpuc.ca.gov

CalAdvocates.WildfireDiscovery@cpuc.ca.gov

Re: CA 2022-WMPs
CalAdvocates-PacifiCorp-2022WMP-06

Please find enclosed PacifiCorp's responses to Cal PA data requests 6.1-6.4. Also provided is Attachment Cal PA 6.2.

If you have any questions, please call me at (503) 813-7314.

Sincerely,

_____/s/_____
Pooja Kishore
Manager, Regulation

CalPA Data Request 6.1

2022 WMP Update submission, and to the attached Follow-up Accident Report submitted to the CPUC regarding the Slater Fire (the “Accident Report”), dated October, 16, 2020 - the Accident Report states that “Pacific Power is conducting a full investigation of the cause and origin of the fire.”

- (a) Please provide Pacific Power’s analysis of the cause and origin of the Slater Fire.
- (b) Please include all documentation (including but not limited to root cause analyses, risk and mitigation analyses, reports, work papers, etc.) regarding the analysis discussed in subpart (a) above.

Response to CalPA Data Request 6.1

PacifiCorp objects; PacifiCorp’s investigation of the Slater Fire is protected by the attorney-client privilege and the attorney work product doctrine; there is pending litigation regarding the Slater Fire.

CalPA Data Request 6.2

2022 WMP Update submission, and to the attached Follow-up Accident Report submitted to the CPUC regarding the Slater Fire (the “Accident Report”), dated October, 16, 2020 - This question pertains to external documents, meaning any investigation, examination, or analysis of the Slater Fire that was not performed by PacifiCorp.

- (a) Please provide any external investigation reports that PacifiCorp possesses regarding the Slater Fire, including but not limited to CPUC or U.S. Forest Service investigation reports.
- (b) Are you aware of any external investigation reports or analyses pertaining to the Slater Fire, aside from those covered by part (a) of this question? If so, please *identify* each such document.

Response to CalPA Data Request 6.2

Please refer to Attachment CalPA 6.2.

CalPA Data Request 6.3

2022 WMP Update submission, and to the attached Follow-up Accident Report submitted to the CPUC regarding the Slater Fire (the “Accident Report”), dated October, 16, 2020

- (a) T Based on the reports and analyses addressed in questions 1 and 2, what has PacifiCorp learned about wildfire risk in its service territory and wildfire mitigation methods. Please identify each lesson separately.
- (b) Please state the basis of each lesson identified in part (a) above.

Response to CalPA Data Request 6.3

PacifiCorp objects; PacifiCorp’s investigation of the Slater Fire is protected by the attorney-client privilege and the attorney work product doctrine; there is pending litigation regarding the Slater Fire.

CalPA Data Request 6.4

2022 WMP Update submission, and to the attached Follow-up Accident Report submitted to the CPUC regarding the Slater Fire (the “Accident Report”), dated October, 16, 2020 - the Accident Report also states that “Pacific Power is repairing the [sic] all the facilities affected by the fire”.

- (a) Please provide a detailed description of these repairs referenced above.
- (b) Please provide a detailed description of any other changes made to Pacific Power’s system as a result of the Slater Fire and resultant investigations.

Response to CalPA Data Request 6.4

- (a) Repairs of facilities largely include the rebuild of transmission and distribution lines and the associated equipment damaged by the wildfire. Rebuild of damaged assets includes the restoration of damaged portions of transmission line 33. To support wildfire mitigation efforts, pole materials used will be a stronger nonwooden solution and a more fire resilient material such as fiberglass or steel. In addition to the line 33 rebuild, repairs also include distribution pole replacement and the replacement of transformers which were damaged by the fire. The line rebuild and pole replacements shall be installed as per the most recent engineering standards, aligning with California General Orders (GO).
- (b) PacifiCorp objects; PacifiCorp’s investigation of the Slater Fire is protected by the attorney-client privilege and the attorney work product doctrine; there is pending litigation regarding the Slater Fire.