



Public Advocates Office Data Request

No. CalAdvocates-PacifiCorp-2023WMP-08
Proceeding: 2023-2025 Wildfire Mitigation Plans

Date of issuance: Thursday, May 25, 2023
Responses due: Wednesday, May 31, 2023

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INSTRUCTIONS

You are instructed to answer the following Data Request in the aforementioned proceeding, with written, accurate responses pursuant to Public Utilities Code §§ 309.5(e) and 314, Rule 1.1 of the California Public Utilities Commission's (CPUC) Rules of Practice and Procedure, and the Office of Energy Infrastructure Safety's (OEIS) guidelines for Wildfire Mitigation Plan (WMP) discovery.¹

Restate the text of each data request question prior to providing the response. Provide the name and title of the responding individual (i.e., the person responsible for the content of your answer) for each data request question. If the responding individual is not your employee, please provide their name, title, and employer, as well as the name and title of your employee who is directly responsible for the work of the responding individual.

Please send your responses and inquiries to the originators of this data request (that is, the Public Advocates Office employees and attorneys listed on the cover page), with copies to the following representatives of the Public Advocates Office:

1. CalAdvocates.WildfireDiscovery@cpuc.ca.gov
2. Henry.Burton@cpuc.ca.gov
3. Tyler.Holzschuh@cpuc.ca.gov

Requests for Clarification: If a request, definition, or an instruction, is unclear, please notify the originators in writing as soon as feasible, including a specific description of what you find unclear and why. If possible, please provide a proposal for resolving the issue. In any event, unless directed otherwise by the originators, answer the request to the fullest extent possible, explain why you are unable to answer in full, and describe the limitations of your response.

Incomplete responses: If you are unable to answer a question completely, accurately, and with the specificity requested, notify the originators as soon as possible. If possible, please provide a proposal for resolving the issue. In your written response to the question, explain why you are unable to answer in full and describe the limitations of your response.

Timing of responses: Please respond to each question as soon as your complete response to that specific question is available, and no later than the due date listed on the cover sheet.

Deadline extension requests: If you are unable to provide a complete response to each question by the due date noted on the cover page, contact the originators in writing to request a deadline extension. In your deadline extension request, please (1) specify the questions affected by the delay, (2) propose an alternative response date and (3) provide a written explanation as to why the deadline cannot be met. Please submit your deadline extension request as soon as feasible. To

¹ Office of Energy Infrastructure Safety, *Final 2023-2025 Wildfire Mitigation Plan Process and Evaluation Guidelines*, December 6, 2022, Section 8 (pp. 13-17).

comply with OEIS discovery guidelines, you must submit an extension request to the originators at least 2 business days prior to the due date.²

Objections: If you object to any portion of this Data Request, please submit your objections, including the specific legal basis for each objection, to the originators as soon as possible.

Response format: Responses should be provided in the original electronic format if available, and otherwise, in hard copy. (If available in Word or Excel format, send the Word or Excel document not a PDF file.)

- All electronic documents submitted in response to this data request should be in readable, downloadable, printable, and searchable formats, unless use of such formats is infeasible.
- Each page should be numbered.
- If any of your answers rely on, refer to or reflect calculations that are not shown therein, provide a copy of the supporting electronic files that were used to derive such calculations, such as Excel spreadsheets or computer programs, with data and formulas intact and functioning.
- Voluminous documents produced in response to the data request should be Bates-numbered and indexed.
- Responses to the data request that refer to or incorporate documents should clearly identify the particular documents referenced, including the title and page number or, if available, Bates-numbers or Bates-range.

Other questions: For any questions, email the originators.

DEFINITIONS

- A. As used herein, the terms “you,” “your(s),” “Company,” and “PacifiCorp” mean PacifiCorp d/b/a Pacific Power and any and all of its respective present and former employees, agents, consultants, attorneys, and officials, and any and all other persons acting on its behalf.
- B. The terms “and” and “or” shall be construed either disjunctively or conjunctively whenever appropriate in order to bring within the scope of this Data Request any information or documents which might otherwise be considered to be beyond their scope.
- C. Date ranges shall be construed to include the beginning and end dates named. For example, the phrases “from January 1 to January 31,” “January 1-31,” “January 1 to 31,” and “January 1 through January 31” should be understood to include both the 1st of January and the 31st of January. Likewise, phrases such as “since January 1” and “from January 1 to the present”

² Deadline extension requests are due to OEIS at least one business day before the deadline, prior to which the electrical corporation “must first make a good-faith effort to ask the stakeholder making the request to agree to the extension.” Office of Energy Infrastructure Safety, *Final 2023-2025 Wildfire Mitigation Plan Process and Evaluation Guidelines*, December 6, 2022, p. 15.

should be understood to include January 1st, and phrases such as “until January 31,” “through January 31,” and “up to January 31” should also be understood to include the 31st.

- D. The singular form of a word shall be interpreted as plural, and the plural form of a word shall be interpreted as singular whenever appropriate in order to bring within the scope of this Data Request any information or documents which might otherwise be considered to be beyond their scope.
- E. The term “communications” includes all verbal and written communications of every kind, including but not limited to telephone calls, conferences, notes, correspondence, and all memoranda concerning the requested communications. Where communications are not in writing, provide copies of all memoranda and documents made relating to the requested communication and describe in full the substance of the communication to the extent that the substance is not reflected in the memoranda and documents provided.
- F. The terms “document,” “documents,” or “documentary material” include, without limitation, the following items, whether in electronic form, printed, recorded, or written or reproduced by hand: reports, studies, statistics, projections, forecasts, decisions, orders, intra-office and interoffice communications, correspondence, memoranda, financial data, summaries or records of conversations or interviews, statements, returns, diaries, calendars, work papers, graphs, notebooks, notes, charts, computations, plans, drawings, sketches, computer printouts, summaries or records of meetings or conferences, summaries or reports of investigations or negotiations, opinions or reports of consultants, photographs, bulletins, records or representations or publications of any kind (including microfilm, videotape, and records however produced or reproduced), electronic or mechanical or electrical records of any kind (including, without limitation, tapes, tape cassettes, discs, emails, and records), other data compilations (including, without limitation, input/output files, source codes, object codes, program documentation, computer programs, computer printouts, cards, tapes, and discs and recordings used in automated data processing, together with the programming instructions and other material necessary to translate, understand, or use the same), and other documents or tangible things of whatever description which constitute or contain information within the scope of this Data Request.
- G. “Relate to,” “concern,” and similar terms and phrases shall mean to consist of, refer to, reflect, comprise, discuss, underlie, comment upon, form the basis for, analyze, mention, or be connected with, in any way, the subject of this Data Request.
- H. “Identify”:
 - i. When used in reference to a Company employee, “identify” includes stating their full name and title.

- ii. When used in reference to a consultant or contractor for the Company, “identify” includes stating the person’s name, title, and employer, and the name and title of the Company employee who is directly responsible for the work of the consultant.
 - iii. When used in reference to a person who is not a current Company employee, consultant or contractor, “identify” includes stating the person’s name; most recent title and supervisor at the Company; and most recent known employer, title/position, and business address.
 - iv. When used in reference to documents, “identify” includes stating the nature of the document (e.g., letter, memorandum, study), the date (if any), the title of the document, the identity of the author, and the general subject matter of the document. For documents not publicly available, please also provide the location of the document, and identify the person having possession, control or custody of the document.
- I. When requested to “state the basis” for any statement (i.e., any analysis, workpaper, study, proposal, assertion, assumption, description, quantification, or conclusion), please describe every fact, statistic, inference, supposition, estimate, consideration, conclusion, study, report, and analysis available to you which you believe to support the statement, or which you contend to be evidence of the truth or accuracy thereof.
 - J. “CPUC” and “Commission” mean the California Public Utilities Commission.
 - K. “Cal Advocates” means the Public Advocates Office at the California Public Utilities Commission.
 - L. “Energy Safety” and “OEIS” mean the California Office of Energy Infrastructure Safety.
 - M. “WMP” means wildfire mitigation plan. Unless otherwise specified, this refers to the 2023-2025 WMP.
 - N. “GIS” means Geographic Information System.
 - O. “HFTD” means High Fire-Threat District as defined in CPUC General Order 95, Section II, item 21.2(D), and CPUC Decision 17.01.009 (pp. 39-40; Ordering Paragraphs 1 and 1(mm)) (“Fire Map 2”).³ This term encompasses three areas:
 - a. Tree Mortality High Hazard Zone (HHZ) 1 on the U.S. Forest Service - CAL FIRE joint map of Tree Mortality HHZs (see D.17-01-009, pp. 39-40);
 - b. HFTD Tier 2, the elevated wildfire risk area included in Shape C map of the CPUC Fire-Threat Map (“Fire Map 2”) that was adopted in D.17.01.009, pp. 39-40; and

³ As modified by Commission Decision 20-12-030.

- c. HFTD Tier 3, the extreme wildfire risk area included in Shape C map of the CPUC Fire-Threat Map (“Fire Map 2”) that was adopted in D.17.01.009, pp. 39-40.
- P. “Non-HFTD” means areas that are not designated as HFTD according to the definition above.
- Q. “Tier 2” means HFTD Tier 2, as defined in D.17.01.009, pp. 25, 39-40 and Ordering Paragraph 1(v).
- R. “Tier 3” means HFTD Tier 3, as defined in D.17.01.009, pp. 25, 39-40 and Ordering Paragraph 1(v).
- S. “Other HFTD” means areas *outside of Tier 2 and Tier 3* that are designated as HFTD because they are included in Tree Mortality High Hazard Zone 1.

DATA REQUEST

Question 1

This question pertains to PacifiCorp’s Quarterly Data Report for the 1st quarter of 2023, filed with Energy Safety on May 2, 2023 (Excel spreadsheet named “PC_2023_Q1_Tables1-15_R0.xlsx”) (hereinafter Q1 2023 QDR).

This question also refers to PacifiCorp’s Quarterly Data Report for the 4th quarter of 2022, filed with Energy Safety on March 6, 2023 (Excel spreadsheet named “PC_2022_Q4_Tables1-15_R1.xlsx”) (hereinafter Q4 2022 QDR).

In the “Table 5” tab, PacifiCorp reports the quarterly number of risk events from Q1 2022 through Q1 2023. However, the values under the 2022 columns⁴ are exactly the same values PacifiCorp reported for 2021 in its Q4 2022 QDR⁵. (See attachment 1)

- a) Please provide a revised Q1 2023 QDR that contains the corrected values for risk events that occurred in each quarter of 2022.

Question 2

This question pertains to PacifiCorp’s Q1 2023 QDR.

In the “Table 2” tab of the Q1 2023 QDR, PacifiCorp reports the median hours for “Time between level 1 asset inspection and resulting maintenance activity” in its HFTD areas.⁶ The values are summarized in the table below.

Area	Hours	Days
HFTD Tier 3	696	29.0

⁴ PacifiCorp’s Q1 2023 QDR, “Table 5” tab, columns I through L.

⁵ PacifiCorp’s Q4 2022 QDR, “Table 5” tab, columns I through L.

⁶ PacifiCorp’s Q1 2023 QDR, “Table 2” tab, column X, row 84.

HFTD Tier 2	420	17.5
Non HFTD	336	14.0

According to General Order 95, utilities must “[t]ake action immediately, either by fully repairing the condition, or by temporarily repairing and reclassifying the condition to a lower priority.”⁷

- a) Please provide an explanation for the substantial amount of time it took PacifiCorp to address level 1 asset corrective findings in its HFTD Tier 3 areas.
- b) Please provide an explanation for the substantial amount of time it took PacifiCorp to address level 1 asset corrective findings in its HFTD Tier 2 areas.
- c) Please provide an explanation why HFTD Tier 3 level 1 asset findings take longer to complete than level 1 asset findings in Non-HFTD and Tier 2.

Question 3

This question pertains to PacifiCorp’s Q1 2023 QDR. In the “Table 2” tab of the Q1 2023 QDR, PacifiCorp reports the median hours for “Time between level 1 asset inspection and resulting maintenance activity” in its HFTD areas.⁸

- a) For level 1 asset corrective findings in HFTD Tier 3 areas in this quarter, the “resulting maintenance activity” occurred at a median of 696 hours after the inspection finding. Did PacifiCorp take interim actions prior to that maintenance to remediate the immediate safety hazards? Please explain your response.
- b) For level 1 asset corrective findings in HFTD Tier 2 areas in this quarter, the “resulting maintenance activity” occurred at a median of 420 hours after the inspection finding. Did PacifiCorp take interim actions prior to that maintenance to remediate the immediate safety hazards? Please explain your response.
- c) Please describe PacifiCorp’s internal standards or protocols for remediating level 1 findings in compliance with the General Order 95 requirement to “take action immediately.”

Question 4

Please provide a list of all Q1 2023, HFTD Tier 3, level 1, asset corrective work orders in a spreadsheet that lists each work order as a row and has the following columns.

- a) Work Order Number
- b) Work Order Description
- c) Equipment Type

⁷ General Order 95, Section “I”, Chapter 18.A.2.(i).

⁸ PacifiCorp’s Q1 2023 QDR, “Table 2” tab, column X, row 84.

- d) Circuit ID number
- e) Line Type (Distribution or Transmission)
- f) Date of Asset Inspection
- g) Date the work order was originally opened
- h) Due Date of the original work order
- i) Geographic latitude of the work order in decimal degrees, truncated to seven decimal places
- j) Geographic longitude of the work order in decimal degrees, truncated to seven decimal places
- k) Date(s) the work order was reinspected or modified (if applicable)
- l) Due date of the work order after it was reinspected or modified (if applicable)
- m) Priority of the work order after it was reinspected or modified (if applicable)
- n) Reason for reinspection (if applicable)
- o) Date the work order (original or reclassified) was completed.

Question 5

This question pertains to PacifiCorp’s Q1 2023 QDR.

In the “Table 3” tab of the Q1 2023 QDR, PacifiCorp reports the total number of “Wire down risks” and “Wire down trends.”⁹ The values are summarized in the table below.

Performance Metric	Count in Q1 2023
Wire Down Risks	59
Wire Down Trends	34

- a) Please provide a definition for “Wire Down Risks.”
- b) How is this metric different than the total number “Wire Down Events” provided in “Table 5”?¹⁰
- c) “Wire Down Risks” refers to “downed conductor during fire season.”¹¹ For this purpose, how is PacifiCorp defining fire season?
- d) Please provide a definition for “Wire Down Trends.”

⁹ PacifiCorp’s Q1 2023 QDR, “Table 3” tab, column M, rows 14 – 15.

¹⁰ PacifiCorp’s Q1 2023 QDR, “Table 5” tab, summation of column M, with column B filter for “Wire down events.”

¹¹ PacifiCorp’s Q1 2023 QDR, “Table 3” tab, cell G14.

- e) “Wire Down Trends” refers to the “[r]eduction in quantity of wire down events, year over year, during the designated fire season period.”¹² For this purpose, how is PacifiCorp defining fire season?
- f) Given that the Q1 2023 QDR states that both “Wire Down Risks” and “Wire Down Trends” address issues during fire season, why does PacifiCorp report non-zero values in the first quarter of the year (which is not normally considered fire season)?

Question 6

This question pertains to PacifiCorp’s 2023 WMP, Table 8-5, p. 136.

PacifiCorp has provided wire down, outage, inspection count, and work order information in its Q1 2023 QDR. However, this information is missing in Table 8-5.

PacifiCorp explains that “[a]t the time of this filing, Pacific Power is unable to provide performance metrics for Grid Design, Operations, and Maintenance.

- a) Please provide an explanation for reporting the aforementioned data in PacifiCorp’s Q1 2023 QDR but not in PacifiCorp’s 2023 WMP.
- b) Please describe PacifiCorp’s Quality Assurance and Quality Control procedures for ensuring accurate and consistent information is provided in both QDRs and its WMP.

Question 7

- a) Is PacifiCorp aware of any errors or omissions in its Q1 2023 QDR, aside from the issues noted in question 1 above?
- b) If the answer to the previous part is yes, please identify and correct each such error.

Question 8

At this time, does PacifiCorp intend to submit errata or a corrected version of its Q1 2023 QDR?

END OF REQUEST

¹² PacifiCorp’s Q1 2023 QDR, “Table 3” tab, cell G15.