



Public Advocates Office Data Request

No. CalAdvocates-PacifiCorp-2022WMP-09
Proceeding: 2022 Wildfire Mitigation Plans

Date of issuance: Wednesday, June 1, 2022
Responses due: Monday, June 6, 2022

To: **Data Request Center** Email: datarequest@pacificorp.com
PacifiCorp Email: ctdiscovery@pacificorp.com

Tim Clark Email: Tim.Clark@pacificorp.com
PacifiCorp

Megan Buckner Email: Megan.Buckner@pacificorp.com
PacifiCorp

Bruce Dao Email: Bruce.Dao@pacificorp.com
PacifiCorp

Pooja Kishore Email: Pooja.Kishore@PacifiCorp.com
PacifiCorp

From: **Matthew Karle** Phone: (415) 703-1850
Senior Analyst Email: Matthew.Karle@cpuc.ca.gov
Public Advocates Office

Charles Madison Phone: (530) 771-7023
Senior Utilities Engineer Email: Charles.Madison@cpuc.ca.gov
Public Advocates Office

Carolyn Chen Phone: (415) 703-1980
Attorney Email: Carolyn.Chen@cpuc.ca.gov
Public Advocates Office

Layla Labagh Phone: (415) 696-7372
Attorney Email: Layla.Labagh@cpuc.ca.gov
Public Advocates Office

Cal Advocates Wildfire Discovery Email: CalAdvocates.WildfireDiscovery@cpuc.ca.gov

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 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. Natalie.Monroe@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. Please submit your deadline extension request as soon as feasible. 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.

¹ Office of Energy Infrastructure Safety, *Final 2022 Wildfire Mitigation Plan (WMP) Update Guidelines*, December 15, 2021. See Attachment 5: Guidelines for Submission and Review of 2022 Wildfire Mitigation Plan Updates, pp. 10-11.

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. *At latest*, submit your objections and legal bases by the response deadline on the cover sheet.

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,” “PacifiCorp,” and “Pacific Power” mean PacifiCorp 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” 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.
- L. “Energy Safety” and “OEIS” mean the California Office of Energy Infrastructure Safety.
- M. “WMP” means wildfire mitigation plan.
- N. “GIS” means Geographic Information Systems.
- 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”).² 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
 - 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).

² As modified by Commission Decision 20-12-030.

- 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.
- T. “ECC” means PacifiCorp’s Emergency Coordination Center.

DATA REQUEST

The following questions relate to your 2022 WMP Update submission.

Question 1

Regarding WMP initiative #7.3.4.15 (Substation Inspections):

On Page 182, PacifiCorp states that “substations are inspected eight times per year. Over the course of 2022, the goal is to complete 444 inspections.” PacifiCorp reports performing two types of inspections on substations: Substation Inspection (including InfraRed) and Substation & Security Inspections. According to Table 8 (2021 non-spatial data file, columns AC, AD, AE, and AF), PacifiCorp has 67 substations.

- a) Please explain how all the substations are inspected at least eight times per year if only 438 inspections were completed in 2021.
- b) If some scheduled substation inspections were not completed in 2021, please explain why.
- c) Please explain the difference between Substation Inspections (including InfraRed) and Substation & Security Inspections.
- d) What is PacifiCorp’s normal frequency for Substation Inspections (including InfraRed)? If this varies by HFTD tier, please state the frequency for each HFTD tier.
- e) What is PacifiCorp’s normal frequency for Substation & Security Inspections? If this varies by HFTD tier, please state the frequency for each HFTD tier.
- f) Please provide a copy of five of the most recently completed Substation Inspections (including InfraRed).
- g) Please provide a copy of five of the most recently completed Substation & Security Inspections.

Question 2

Table 12 of the Non-Spatial Data File included with PacifiCorp’s 2022 WMP update refers to WMP initiative #7.3.4.14 (Quality Assurance and Quality Control of inspection). With this context in mind,

- a) Please provide a unit of measurement for the 11,485 in column AN.
- b) Please provide projected values for 2022 and 2023.

- c) Please provide a copy of the Quality Assurance/Quality Control procedure/program documentation related to asset management and inspections.

Question 3

Regarding PacifiCorp's response to Cal Advocates data request CalAdvocates-PacifiCorp-2022WMP-02, Question 1, "Audit Summary (CA) (2021)" excel file:

- a) Please define columns M through R of this excel sheet.
- b) Please explain what is required for an inspection to pass or fail, per column L "Fail / Pass".
- c) Please explain what subsequent action PacifiCorp takes when a value is filled in for Column M "Add".
- d) Please explain what subsequent action PacifiCorp takes when a value is filled in for Column N "Rem".
- e) Please explain what subsequent action PacifiCorp takes when a value is filled in for Column O "Pri".
- f) What follow-up actions were performed as a result of the audits listed in this excel file (e.g., a new work order was generated if a new deficiency was found, or a work order was modified if a deficiency was determined to be less of an impact, etc.)?

Question 5

Regarding PacifiCorp's response to Cal Advocates data request CalAdvocates-PacifiCorp-2022WMP-04, Question 1 response, "Audit Summary (CA)(2022Q1)" excel file:

What follow-up actions were performed because of the audits listed in this excel file (e.g., a new work order was generated if a new deficiency was found, or a work order was modified if a deficiency was determined to be less of an impact, etc.)?

Question 6

Regarding 7.3.4.2 (Detailed inspections of transmission electric lines and equipment):

- a) Please explain why the annual total cost of inspections, presented in Table 1 below, fluctuates during years 2021 – 2023 while the number of inspections performed increases each year.
- b) Please explain the decrease in the unit cost of inspections from the 2021 proposed figures to the 2021 actual figure.
- c) Please explain the expected decrease in the unit cost of inspections from 2021 actual figures to 2022 projections.

Table 1. Side-by-side of Detailed transmission inspections performed and associated costs. (Source: Table 12 of non-spatial data)		
Year	Number of Inspections	Costs
2021 (Proposed)	666	\$27,808
2021 (Actual)	1,439	\$27,000
2022 (Projected)	2,545	\$9,000
2023 (Projected)	2,738	\$18,000

Question 7

Table 12 of the Non-Spatial Data File included with PacifiCorp’s 2022 WMP update refers to WMP initiative #7.3.4.1 (Detailed inspections on electric distribution equipment and line).

- a) Please provide the actual number of circuit miles inspected in this initiative each year from 2019 – 2021.
- b) Provide PacifiCorp’s current forecast of the number of circuit miles to be inspected in 2022.
- c) Provide PacifiCorp’s current forecast of the number of circuit miles to be inspected in 2023.

Question 8

Table 12 of the Non-Spatial Data File included with PacifiCorp’s 2022 WMP update refers to WMP initiative #7.3.4.2 (Detailed inspections on electric transmission equipment and line).

- a) Please provide the actual number of circuit miles inspected in this initiative each year from 2019 – 2021.
- b) Provide PacifiCorp’s current forecast of the number of circuit miles to be inspected in 2022.
- c) Provide PacifiCorp’s current forecast of the number of circuit miles to be inspected in 2023.

Question 9

Table 12 of the Non-Spatial Data File included with PacifiCorp’s 2022 WMP update refers to WMP initiative #7.3.4.11 (Patrol inspections on electric distribution equipment and line).

- a) Please provide the actual number of circuit miles inspected in this initiative each year from 2019 – 2021.
- b) Provide PacifiCorp’s current forecast of the number of circuit miles to be inspected in 2022.
- c) Provide PacifiCorp’s current forecast of the number of circuit miles to be inspected in 2023.

Question 10

Table 12 of the Non-Spatial Data File included with PacifiCorp's 2022 WMP update refers to WMP initiative #7.3.4.12 (Patrol inspections on electric transmission equipment and line).

- a) Please provide the actual number of circuit miles inspected in this initiative each year from 2019 – 2021.
- b) Provide PacifiCorp's current forecast of the number of circuit miles to be inspected in 2022.
- c) Provide PacifiCorp's current forecast of the number of circuit miles to be inspected in 2023.

Question 11

Table 12 of the Non-Spatial Data File included with PacifiCorp's 2022 WMP update, refers to WMP initiative #7.3.4.5 (Infrared inspections of transmission electric lines and equipment). With that context in mind:

- a) Please explain why the actual cost of this initiative for 2021 is exactly \$80,000.
- b) Please explain why the actual output of this initiative for 2021 is exactly 700 circuit miles.
- c) Please explain why the projected cost estimated for both 2022 and 2023 is exactly \$80,000.
- d) Please explain why the projected output of this initiative for both 2022 and 2023 is exactly 700 circuit miles.

Question 12

On average, how many person-hours of labor does it take PacifiCorp to complete one asset inspection in each of the following initiatives:

- a) Detailed Inspections - Distribution
- b) Detailed Inspections - Transmission
- c) Patrol Inspections - Distribution
- d) Patrol Inspections - Transmission

Question 13

Please provide the results of all 2021 pole loading assessments that PacifiCorp performed in HFTD areas.

END OF REQUEST