



*Public Advocates Office*  
*California Public Utilities Commission*

505 Van Ness Avenue  
San Francisco, CA 94102  
Phone: (415) 703-2544  
Fax: (415) 703-2057

<http://publicadvocates.cpuc.ca.gov>

**PUBLIC ADVOCATES OFFICE DATA REQUEST**

**No. CalAdvocates-PacifiCorp-2021WMP-02**  
**Proceeding: 2021 Wildfire Mitigation Plans**

Date of issuance: March 25, 2021  
Response requested: March 30, 2021

To: **Betsy Watkins**  
PacifiCorp

Email: [Betsy.Watkins@PacifiCorp.com](mailto:Betsy.Watkins@PacifiCorp.com)

**Tim Clark**  
PacifiCorp

Email: [Tim.Clark@pacificorp.com](mailto:Tim.Clark@pacificorp.com)

**Data Request Response Center**  
PacifiCorp

Email: [datarequest@pacificorp.com](mailto:datarequest@pacificorp.com)

**Regulatory Relations**  
PacifiCorp

Email: [regrelcpucases@pge.com](mailto:regrelcpucases@pge.com)

From: **Matthew Yunge**  
Senior Utilities Engineer  
Public Advocates Office

Phone: (415) 703-1667  
Email: [Matthew.Yunge@cpuc.ca.gov](mailto:Matthew.Yunge@cpuc.ca.gov)

**Matthew Karle**  
Regulatory Analyst  
Public Advocates Office

Phone: (415) 703-1850  
Email: [Matthew.Karle@cpuc.ca.gov](mailto:Matthew.Karle@cpuc.ca.gov)

**Carolyn Chen**  
Attorney  
Public Advocates Office

Phone: (415) 703-1980  
Email: [Carolyn.Chen@cpuc.ca.gov](mailto:Carolyn.Chen@cpuc.ca.gov)

## INSTRUCTIONS

You are instructed to answer the following Data Requests in the above-captioned proceeding, with written, verified responses per Public Utilities Code §§ 309.5(e) and 314, and Rules 1.1 and 10.1 of the California Public Utilities Commission's Rules of Practice and Procedure. Restate the text of each request prior to providing the response. Identify the person providing the answer to each data request and his/her contact information.

Please send your response to the Originator and e-copies to the following Public Advocates Office representatives:

Henry.Burton@cpuc.ca.gov

Provide your response as it becomes available, but no later than the due date noted above. If you are unable to provide a response by this date, notify the Originator **at least** 1 day before the data request is due and provide a written explanation as to why the response date cannot be met and a best estimate of when the information can be provided. Please identify the person who will be providing the response and his/her phone number and email address.

Responses should be provided in the original electronic format, if available, and if not, in hard copy. (If available in Word format, send the Word document and do not send the information as 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 refer to or reflect calculations, provide a copy of the supporting electronic files that were used to derive such calculations, such as Excel-compatible spreadsheets or computer programs, with data and formulas intact and functioning. Documents produced in response to the data requests should be Bates-numbered and, if voluminous, indexed. Responses to data requests that refer to or incorporate documents should identify the particular documents referenced by Bates-numbers or Bates-range.

For any questions, email the Public Advocates Office contact(s) above with a copy to the Public Advocates Office attorney. If you are unable to answer a question completely, accurately, and with the specificity requested, notify the Public Advocates Office as soon as possible. In your written response to the question, explain why you are unable to answer in full and describe the limitations of your response.

## DEFINITIONS

- A. As used herein, the terms "you," "your(s)," "Company," and "PacifiCorp" 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 these Data Requests 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 these Data Requests 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 these data requests
- 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 these Data Requests.
- H. “Identify”:
  - i. When used in reference to a person, includes stating his or her full name, his or her most recent known business address and telephone number, and his or her present title or position;
  - ii. When used in reference to documents, includes stating the nature of the document (e.g., letter, memorandum), the date (if any), the title of the document, the identity of the author and/or the document, the location of the document, the identity of the person having possession, control or custody of the document, and the general subject matter of the document.

- I. When requested to “state the basis” for any analysis (including studies and workpapers), proposal, assertion, assumption, description, quantification, or conclusion, please describe every fact, statistic, inference, supposition, estimate, consideration, conclusion, study, and analysis known to you which you believe to support the analysis, proposal, assertion, assumption, description, quantification, or conclusion, or which you contend to be evidence of the truth or accuracy thereof.
- J. HFTD means High Fire-Threat District.

## **DATA REQUESTS**

The following questions relate to PacifiCorp’s 2021 Wildfire Mitigation Plan (WMP)

### **Question 1**

Provide a list of the contractors that PacifiCorp works with to conduct vegetation management. For each contractor, state whether the contractor performs pre-inspection, trimming and removal, or work verification.

### **Question 2**

Provide a list of all instances in which PacifiCorp’s audits of vegetation management work identified missed trees<sup>1</sup> or other vegetation work that did not pass quality control in 2020. For each instance provide the date, location, description of the issue and solution, and name of the contractor firm.

### **Question 3**

In its 2020 WMP, PacifiCorp forecasted that it would install 38 miles of covered conductor in 2020 and 52 miles in 2021. In its 2021 WMP, PacifiCorp stated that it installed only 1.4 miles of covered conductor in 2020 and would install 81.22 miles in 2021.

- a) What specific factors prevented PacifiCorp from installing the forecasted amount of covered conductor in 2020?
- b) What changes did PacifiCorp make or does PacifiCorp plan to implement to address the factors from question 3(a) above and accelerate the pace of covered conductor installation in 2021? Please be specific.
- c) In Table 12 of its performance metrics tables, PacifiCorp uses line miles to describe the amount of covered conductor that it installed or plans to install. What definitions does PacifiCorp use for the terms “line mile” and “circuit mile”?

### **Question 4**

During the March 23, 2021 technical workshop, PacifiCorp stated that the change in pole replacement/reinforcement forecasts between its 2020 WMP and its 2021 WMP was due to a change in philosophy in implementing this mitigation in higher risk areas. Please explain in detail

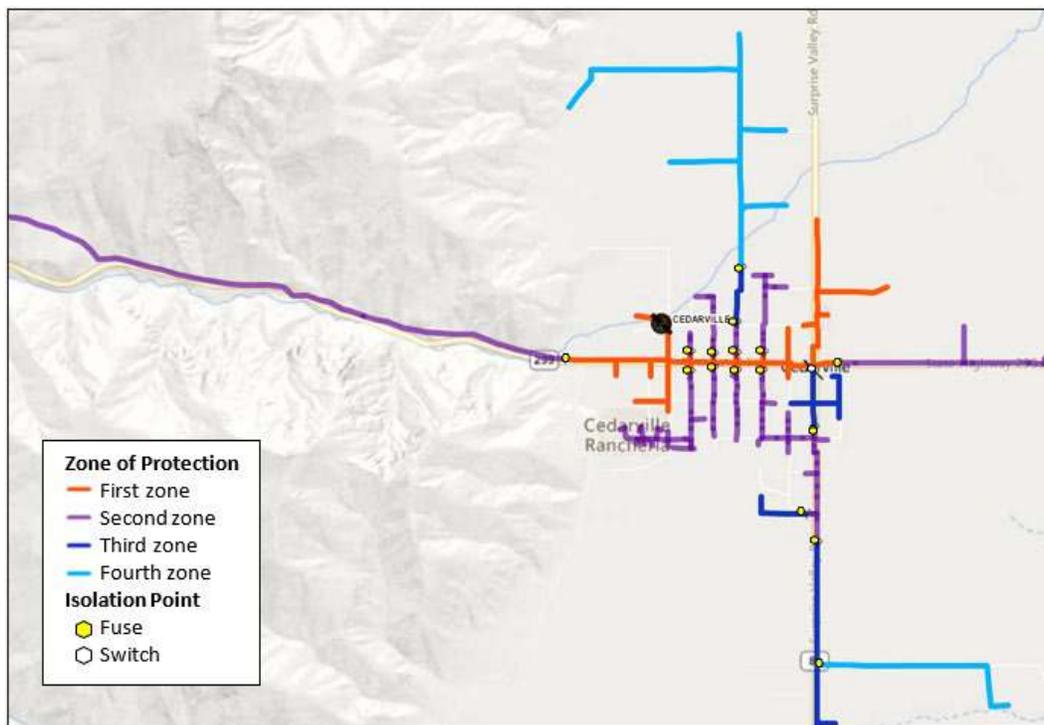
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<sup>1</sup> Trees that should have been identified for trimming or removal but were missed by vegetation management inspectors.

all the factors that PacifiCorp considered in its decision to reduce the forecasted pole replacement/reinforcement workload for 2020, 2021, and 2022 and increase the forecasted workload for 2023.

### **Question 5**

Regarding Zones of Protection (ZOP), PacifiCorp provided a map (provided below) that illustrated how PacifiCorp models ZOPs on page 57 of its 2021 WMP. For calculating wildfire risk, does PC calculate (a) one risk score for each of the 17 distinct segments between isolation points as shown on the map, or (b) one risk score for each of the four ZOP categories (i.e., a risk score for First Zone, Second Zone, etc.), or (c) another way not listed above?



### **Question 6**

On page 144 of its 2021 WMP, PacifiCorp states that Fire Risk Conditions (defined as conditions that are designated under a particular Condition Code associated as a fire risk) are assigned a higher risk level than those outside of the HFTD. Table 7-5 of the WMP shows that PacifiCorp's correction timeframes for Priority B conditions depend on whether the condition is located in Tier 2 or Tier 3 HFTD.

Does PacifiCorp use different correction timeframes for Priority A (non-imminent) conditions that are also Fire Risk Conditions, than if they are not Fire Risk Conditions? If the answer is yes, explain such timeframes used in each HFTD tier.

**END OF REQUEST**