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RE: CA 2025-WMPs
OEIS-P-WMP_2025-PC-12

Please find enclosed PacifiCorp's Responses to OEIS Data Requests 12.1-12.2.

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

Sincerely,

 /s/
Pooja Kishore
Manager, Regulation

OEIS Data Request 12.1

Regarding Wood and Slash Management Tracking - On page 292 of its 2026-2028 Base WMP, PacifiCorp states that “PacifiCorp’s wood and slash/debris management practices are part of the base vegetation management program. PacifiCorp manages or disposes of debris typically less than six inches in diameter, through the following typical methods, chipping and hauling offsite, chipping and broadcast onsite, and lop and scatter in accordance with industry best management practices.”¹

(a) Does PacifiCorp document and track the management of wood and slash/debris that is a byproduct of vegetation management work?

i. If yes:

1. Describe the documentation and record-keeping methods PacifiCorp uses.
2. List the data fields that PacifiCorp uses as a part of the wood and slash/debris management tracking process.
3. Describe any limitations to PacifiCorp’s wood and slash/debris management documentation and record-keeping that prevents PacifiCorp from documenting and tracking all wood and slash/debris that is a byproduct of vegetation management work.

ii. If no, explain:

1. How PacifiCorp ensures it completes wood and slash/debris management in all vegetation management treatment areas according to the procedures outlined in Section 9.5 of its 2026-2028 Base WMP.
2. If PacifiCorp can verify wood and slash/debris management only in some vegetation management treatment areas, specify which wood and slash/debris management activities it can and cannot ensure are completed.

Response to OEIS Data Request 12.1

a.

i. Yes

1. PacifiCorp currently records limited information regarding the management of wood and slash/debris using its mobile data management software. High-level

¹ PacifiCorp, 2026-2028 Base Wildfire Mitigation Plan, Published July 11, 2025, URL:(<https://efiling.energy.ca.gov/eFiling/Getfile.aspx?fileid=58907&shareable=true>).

Despite PacifiCorp's diligent efforts, certain information protected from disclosure by the attorney-client privilege or other applicable privileges or law may have been included in its responses to these data requests. PacifiCorp did not intend to waive any applicable privileges or rights by the inadvertent disclosure of protected information, and PacifiCorp reserves its right to request the return or destruction of any privileged or protected materials that may have been inadvertently disclosed. Please inform PacifiCorp immediately if you become aware of any inadvertently disclosed information.

information regarding management of wood and slash/debris management may be recorded by personnel conducting the inspection. Inspection personnel also may record how wood and slash/debris will be managed with respect to tree removals when obtaining consent from the landowner.

2. Data fields that may be used to record information regarding wood and slash/debris management include the following:

- Inventory form: At their discretion, inspectors may record applicable information in the Work Description field of the inventory form.
- Property Owner Permission form (permission form): Inspectors may record agreed upon measures regarding wood and slash/debris with respect to removals in the Notes field of the permission form.

3. The mobile data management software is not set up to explicitly record completed wood and slash/debris management actions within the mobile data management software.

ii.

1. Not applicable. Please see response to a.(i).

2. Not applicable. Please see response to a.(i).

OEIS Data Request 12.2

Regarding PacifiCorp's Substation Defensible Space Management Program

On page 222 of its 2023-2025 Base WMP R6, in reference to substation defensible space inspections, PacifiCorp stated that it “performs substation inspections for vegetation to remove overhang limbs or climbable vegetation and remove weeds. As part of the detailed and patrol inspections, hazard trees are identified and mitigated to address fall-in risk.”¹

On page 295 of its 2026-2028 Base WMP, in reference to PacifiCorp's Substation Defensible Space (VM-13) target, PacifiCorp states that it “is developing a process to address hazard trees that are outside of the substation property.” The 2026–2028 Base WMP does not indicate that detailed and patrol inspections will continue to identify and mitigate fall-in risk to substation facilities as the previous Base WMP did.

- (a) Explain why PacifiCorp omitted from its 2026–2028 Base WMP the description that detailed and patrol inspections identify and mitigate hazard trees to address fall-in risk to substations, as included in its 2023–2025 Base WMP.
- (b) When developing its VM-13 target for its 2026-2028 Base WMP, explain how PacifiCorp considered:
 - i. The risk of hazard trees located within substation properties.
 - ii. The inspection and mitigation of hazard trees located outside of substation properties.

Response to OEIS Data Request 12.2

a.

The language on page 222 of the 2023-2025 Base WMP R6 quoted in OEIS Data Request 12.2 describes two activities. The first sentence describes the substation journeyman inspection for climbable vegetation and overhanging limbs, completed by a substation journeymen who inspects the area within five feet of the substation perimeter fence. The second sentence describes the inspection performed by Vegetation Management for hazard trees around substations which may have a fall-in risk.

The referenced language on page 295 of the 2026-2028 Base WMP was not intended to contradict the description of these activities in the 2023-2025 Base Wildfire Mitigation Plan (WMP). PacifiCorp Vegetation Management continues to inspect for hazard trees with fall-in risk as part of its normal detail and patrol inspections. Such language was

¹ PacifiCorp, 2023-2025 Base Wildfire Mitigation Plan Revision 6, Published January 17, 2025, URL:(<https://efiling.energy.ca.gov/eFiling/Getfile.aspx?fileid=57823&shareable=true>).

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merely intended to indicate that PacifiCorp continues to advance data management capabilities within its vegetation management activities and, specifically, to further document a vegetation condition identified by a substation journeyman which is communicated to Vegetation Management for corrective work.

b.

i. There are no trees within a substation perimeter fence, so Initiative VM-13 was developed expressly focused on trees outside of the Substation property.

ii. Please see the response to subsection (i).