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Re: CA 2026-2028 WMPs
CPUC SPD Set 1 (1)

Please find enclosed PacifiCorp's response to CPUC SPD 1st Set data request 1.1 as well as attachment CPUC SPD 1.1-1.

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

Sincerely,

 /s/
Pooja Kishore
Manager, Regulation

CPUC SPD Data Request 1.1

WMP Clarifications - Clarify the difference between PacifiCorp's HFRA and HFTD map?

- (a) Provide GIS shapefiles of the HFRA and HFTD if they are different.
- (b) Provide a list of use cases for the HFRA and the HFTD and explain in each why one HFTD/HFRA is used over the other option.
- (c) Explain how the HFRA mapping methodology differs from the CPUC's HFTD methodology.

Response to CPUC SPD Data Request 1.1

The boundaries of the High Fire Threat District (HFTD) are set by the state-wide High Fire Threat District Map, which was developed at the direction of the California Public Utility Commission (CPUC) under R.15-05-006 and adopted as final in early 2018. The High Fire Risk Area (HFRA) was developed by PacifiCorp in 2023 and implemented in 2024. The mapped boundaries of the HFRA reflect areas of elevated fire risk identified through application of PacifiCorp's risk modeling that are *in addition to* the HFTD areas delineated on the state-wide map.

- a. Please see Attachment CPUC SPD 1.1-2 for the HFRA and HFTD maps.
- b. In the 2026-2028 Base Wildfire Mitigation Plan (WMP), the Company identified three initiatives that prioritize mitigations in the Tier 2 and Tier 3 HFTD over the HFRA.
 - Initiatives AI-03 and AI-04: Detailed Inspections of Transmission and Distribution Electric Lines and Equipment: As described on page 224 of the 2026-2028 Base WMP, PacifiCorp prioritizes HFTD Tier 2 and Tier 3 inspections in the first half of the year. As described on page 238 of the 2026-2028 Base WMP, the correction timeframe for conditions discovered in the HFTD Tier 2 or Tier 3 and the HFRA are the same. As a pilot, PacifiCorp is performing a detailed inspection on all HFTD Tier 3 locations in 2025. PacifiCorp will evaluate the pilot after year end to determine if the detailed inspection frequency should be updated within the HFTD Tier 3 or Tier 2 locations.
 - Initiative AI-12 Asset Inspection Quality Control and Quality Assurance (QA/QC): As described on page 224 of the 2026-2028 Base WMP, PacifiCorp prioritizes HFTD Tier 2 and Tier 3 detailed inspections of transmission and distribution electric lines and equipment (initiatives AI-03 and AI-04) in the

first half of the year, and the QA/QC of the HFTD Tier 2 and Tier 3 inspections are also prioritized. The quarterly desktop reviews described on page 224 of the 2026-2028 base WMP also prioritize HFTD Tier 2 and Tier 3 inspections.

- c. The HFRA mapping methodology is similar to the methodology which was used to generate the state-wide map and the HFTD, described in the Final Report of the Independent Review Team, dated November 21, 2017, in terms of the overarching goal to identify geographic areas with an elevated potential for fire ignition and spread. The primary difference in PacifiCorp's HFRA mapping methodology is that it is specific to PacifiCorp's service territory and is based on the output of the wildfire risk modeling that is described in Section 5 of the 2026-2028 Base WMP. This methodology uses the Wind-driven and Fuel/Terrain-driven risk scores at the circuit segment level. The segments that have a Wind-driven or a Fuel/Terrain driven risk score greater than or equal to 0.85 are labeled as HFRA segments. These new segments are then intersected with the one-mile by one-mile district grids which are then designated as HFRA. The new grids then undergo a verification process by subject matter experts within PacifiCorp. As discussed above, the HFRA is additive and its identification of additional areas of elevated fire risk may also reflect some change in the environmental conditions from 2017 to 2024.