



825 NE Multnomah, Suite 2000
Portland, Oregon 97232

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Adam Barsch
adam.barsch@cpuc.ca.gov

Edwin Schmitt
edwin.schmitt@cpuc.ca.gov

Arnold Son
arnold.son@cpuc.ca.gov

Re: CA 2026-2028 WMPs
CPUC SPD Set 3 (1)

Please find enclosed PacifiCorp's response to CPUC SPD 3nd Set data request 3.1.

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

Sincerely,

 /s/
Pooja Kishore
Manager, Regulation

CPUC SPD Data Request 3.1

In PacifiCorp 2026–2028 Base WMP, at page 289, PacifiCorp states that the “Enhanced Overhang Reduction Pilot” has been completed, but does not provide the results of the pilot.

- (a) Provide the results of the pilot and any impact that the pilot will have on future vegetation management practices.
- (b) If a review or results of the pilot have not yet been finalized, provide any initial thoughts and findings regarding the pilot and an expected completion date.
 - i. Send final results once they are complete.

Response to CPUC SPD Data Request 3.1

- (a) Consistent with the 2023-2025 Base Wildfire Mitigation Plan (WMP), the Enhanced Overhang Reduction Pilot result will be reviewed and determinations made in Q4 2025.
- (b) Please refer to the information below which provides an overview of the pilot approach, initial findings, and the next steps to complete the pilot:

Approach: Vegetation management work for the overhang reduction pilot was completed in 2023 in five plot areas located within the Tier 3 High Fire Threat District (HFTD) on two circuits in Weed and Mount Shasta, California. The plot areas included a total of 3.27 miles and included various hardwood and coniferous species. Work was completed between May 5, 2023, and December 8, 2023, with 218 trees pruned for overhanging clearance and 127 trees removed. Trees were removed if they were in close proximity to conductors (typically at the edge of the right of way (ROW)) and if removing excessive foliage could lead to potential dieback. An audit of work was conducted on May 15, 2024, to determine if specifications were met. Three trees were returned to the contractor to perform additional overhang clearance and one location required return for further clean-up.

Initial Findings: On December 12, 2024, a post-work health assessment was conducted by a PacifiCorp forester utilizing American National Standards Institute (ANSI) A 300 Part 9 Level 1 Tree Risk Assessment. Trees were assessed for dieback; percent ratio decline, and other defects that could present risk to power lines. Three ponderosa pines showed initiation of dieback, one ponderosa pine had 50 percent dieback, and a white fir showed initiation of dieback.

A second post-tree work health assessment was conducted on June 10, 2025. Five trees that showed initial signs of dieback in December 2024 did not exhibit further

dieback. Two trees had significant pitching from upper overhang pruning cuts, which may require further follow-up on routine inspections.

Next Steps: As a final task in the pilot, outage data will be reviewed to determine whether there is discernable improvement or reduction of power outages in the five plot areas where work was performed. Determination on continuing the pilot includes review of International Society of Arboriculture (ISA) best management practices and whether additional crown removal has an overall impact on power outages or ignition risk reduction. Also taken into consideration is PacifiCorp's vegetation management processes that target overhanging limb defects including dead limbs, limbs with heavy weight distribution over conductors, poor taper, co-dominant stem structure, decay, and species more prone to decay or limb drop. An additional consideration is the continued line rebuild construction and conversion to covered conductor and determining if the increased overhang removal is necessary to reduce the risk of outages on circuits with covered conductor.

- i. PacifiCorp will provide its summary of findings upon completion and respectfully requests guidance from the California Public Utilities Commission (CPUC) Safety Policy Division (SPD) regarding how to provide the summary of the pilot findings.