

Energy Safety DR-261 Data Request 1

Targets – In its 2023-2025 WMP, PacifiCorp describes initiative activity, “Fuels management - Pole clearing beyond PRC 4292” to have a target of “3126 poles brushed in LRA HFTD areas” in 2023. Regarding this target, provide the following:

Excel file exported from PacifiCorp’s vegetation management database of the total number of poles brushed in LRA HFTD areas beyond PRC 4292 in 2023. For each pole include pole IDs, HFTD designation, LRA designation, PRC 4292 exemption status, the date each pole was inspected, any work prescribed to each pole during the inspection, and work completion dates for any prescribed work.

Response to Energy Safety DR-261 Data Request 1

1. Please refer to Attachment Energy Safety 1-1:
 - (a) Total poles worked under this initiative is in cell M2 (3,100 poles).
 - (b) Column I: Pole ID (Column title Pole Number).
 - (c) Column AL: High Fire Threat District (HFTD) designation.
 - (d) Column G: Local Responsibility Area (LRA) designation (Column title Work Code)
 - (e) Column A: Work Completion Date (Column title Treatment date).

2. Please refer to Attachment Energy Safety 1-2:
 - (a) This report provides information regarding poles where notification was recorded.
 - (b) Column K: PRC 4292 Exemption Status (Column title Maintenance Type).
 - (c) Column B: Inspection Date.
 - (d) Columns L, T, and U: Work prescription/description information.

Energy Safety DR-261 Data Request 2

Targets – In its 2023-2025 WMP, PacifiCorp describes initiative activity, “Detailed Inspection – Distribution” to have a target of 450 circuit miles inspected at the end of Q2, 700 circuit miles inspected at the end of Q3, and 829 miles inspected at the end of the year in 2023. Regarding these targets, provide the following:

Inspection records, project closeout documentation, and/or field verification showing PacifiCorp inspected 829 circuit miles in 2023 for detailed inspections - distribution. Include the dates of inspection completion.

Response to Energy Safety DR-261 Data Request 2

(a) Please refer to Attachment Energy Safety 2-1:

- i. Cell O2 of worksheet “Internal Tracker_DISTRIBUTION” provides total line miles inspected, equaling 829.87 miles.
- ii. “DNT” in cell O3 is an acronym for detailed inspection in support of distribution routine cycle maintenance.

(b) Please refer to Attachment Energy Safety 2-2:

- i. This report provides inspection results or work prescribed associated with the detail inspection of the 829.87 miles of distribution line, as well as dates of inspection in Column B.

Energy Safety DR-261 Data Request 3

Targets – In its 2023-2025 WMP, PacifiCorp describes initiative activity, “Detailed Inspection – Transmission” to have a target of 158 circuit miles inspected at the end of Q2, 211 circuit miles inspected at the end of Q3, and 264 miles inspected at the end of the year in 2023. Regarding these targets, provide the following:

Inspection records, project closeout documentation, and/or field verification showing PacifiCorp inspected 264-line miles in 2023 for detailed inspection - transmission. Include the dates of inspection completion.

Response to Energy Safety DR-261 Data Request 3

- (a) Please refer to the Company’s response to Energy Safety Data Request 2 specifically Attachment Energy Safety 2-1:
- i. The sum of cells Q2 and R2 of worksheet “Internal Tracker_TRANSMISSION” totaling 264.87 miles represents the total transmission detail inspection line miles.
 - ii. “TNT” in cell Q3 is an acronym for detailed inspection in support of local transmission routine maintenance.
 - iii. “MGI” in cell R3 is an acronym for detailed inspection in support of main grid transmission.
- (b) Please refer to Attachment Energy Safety 3 which provides inspection results or work prescribed associated with the detail inspection of the 264.87 miles of transmission line as well as the date of inspection in Column B.

Energy Safety DR-261 Data Request 4

Targets – In its 2023-2025 WMP, PacifiCorp describes initiative activity, “Patrol Inspection – Distribution” to have a target of 820 circuit miles inspected at the end of Q2, and 1,027 circuit miles inspected at the end of Q3 and at the end of the year in 2023. Regarding these targets, provide the following:

Inspection records, project closeout documentation, and/or field verification showing PacifiCorp inspected 1,027 circuit miles in 2023 for patrol inspection - distribution. Include the dates of inspection completion.

Response to Energy Safety DR-261 Data Request 4

(a) Please refer to Attachment Energy Safety 4-1:

- i. Cell Q2 of worksheet “Internal Tracker_F CODE” provides total line miles inspected, equaling 1,027.14 miles.
- ii. Column R of worksheet “Internal Tracker_F CODE” is filtered to show only distribution line miles by filtering by color (yellow).
- iii. “FIN” in cell Q3 is an acronym for patrol inspection.
- iv. “FMD” in cell R3 is an acronym for corrective work associated with patrol inspection.

(b) Please refer to Attachment Energy Safety 4-2 which provides inspection results or work prescribed associated with the patrol inspection of the 1,027.14 miles of distribution line, including inspection completion date in column B..

Energy Safety DR-261 Data Request 5

Targets – In its 2023-2025 WMP, PacifiCorp describes initiative activity, “Patrol Inspection – Transmission” to have a target of 296 circuit miles inspected at the end of Q2, and 329 circuit miles inspected at the end of Q3 and at the end of the year in 2023. Regarding these targets, provide the following:

Supporting documentation such as inspection records, project closeout documentation, and/or field verification showing PC inspected 329 line miles in 2023 for patrol inspection - transmission. Please include the dates of inspection completion.

Response to Energy Safety DR-261 Data Request 5

- (a) Please refer to Attachment Energy Safety 5-1, worksheet “Internal Tracker_F CODE”:
 - i. Cell Q2 provides total line miles inspected, equaling 329.03 miles.
 - ii. Column S is filtered to show only transmission line miles by filtering by color (yellow).
 - iii. “FIN” in cell Q3 is an acronym for patrol inspection.
 - iv. “FMT” in cell S3 is an acronym for corrective work associated with patrol inspection.
- (b) Please refer to Attachment Energy Safety 5-2 which provides inspection results or work prescribed associated with the patrol inspection of the 329.03 miles of transmission line including dates of completion in column B.

Energy Safety DR-261 Data Request 6

Targets – In its 2023-2025 WMP, PacifiCorp describes initiative activity, “QA/QC Post-Audits Distribution (Patrol)” to have a target of 635 circuit miles inspected at the end of Q2, and 1,027 circuit miles inspected at the end of Q3 and at the end of the year in 2023. Regarding these targets, provide the following:

Supporting documentation, such as inspection records, project closeout documentation, and/or field verification showing PacifiCorp inspected 1,027 line miles in 2023 for QAQC post audits - distribution (patrol). Please include the dates of inspection completion.

Response to Energy Safety DR-261 Data Request 6

- (a) Please refer to Attachment Energy Safety 6-1, worksheet “Post Audit_F CODE_Summary”:
- i. Cell O2 provides total line miles inspected, equaling 1,026.8.
 - ii. Column O is filtered to show only distribution line miles.
 - iii. “FMD” in cell O4 is an acronym for corrective work associated with patrol inspection.
- (b) Please refer to Attachment Energy Safety 6-2 which provides audit results associated with the corrective maintenance conducted as a result of patrol inspection including dates of inspection in Column B.

Energy Safety DR-261 Data Request 7

Targets – In its 2023-2025 WMP, PacifiCorp describes initiative activity, “QA/QC Post-Audits Transmission (Patrol)” to have a target of 175 circuit miles inspected at the end of Q2, and 329 circuit miles inspected at the end of Q3 and at the end of the year in 2023. Regarding these targets, provide the following:

Supporting documentation, such as inspection records, project closeout documentation, and/or field verification showing PacifiCorp inspected 329 line miles in 2023 for QAQC Post Audits - Transmission (Patrol). Please include the dates of inspection completion.

Response to Energy Safety DR-261 Data Request 7

- (a) Please refer to Attachment Energy Safety 7-1, worksheet “Post Audit_F
CODE_Summary”:
 - i. Cell P2 provides total line miles inspected, equaling 329.
 - ii. Column P is filtered to show only transmission line miles.
 - iii. “FMT” in cell P4 is an acronym for corrective work associated with patrol inspection.
- (b) Please refer Attachment Energy Safety 7-2 which provides audit results associated with the corrective maintenance conducted as a result of patrol inspection, with date of inspection in column B.

Energy Safety DR-261 Data Request 8

Detailed inspections and management practices for vegetation clearances around distribution electrical lines and equipment - In its 2023-2025 WMP, PacifiCorp states, “Pacific Power develops a workplan identifying distribution circuits to be inspected each year based on the established cycle.” These WMP activities are tracked as VM-01 and VM-02 for distribution and VM-06 and VM-07 for transmission. Energy Safety recognizes that PacifiCorp repeats this phrase in other subsections. Regarding this statement, please provide the following for both detailed inspections around distribution (8.2.2.1) and transmission (8.2.2.2) electrical lines and equipment:

Supporting documentation of the workplan utilized in 2023 for the inspection of distribution and transmission circuits as well all the distribution and transmission circuits inspected based on the cycle in the workplan. Please include the dates of the inspections, their respective tracking ID’s, identify any vegetation conditions that were inconsistent with PacifiCorp’s Vegetation SOP, what corrections were made to minimize safety and reliability risks posed by vegetation, and the date of completion for the correction.

Response to Energy Safety DR-261 Data Request 8

- (a) Please refer to Attachment Energy Safety 8-1 which provides a copy of the work plan as an example of long-term planning showing when distribution circuits and transmission lines are scheduled for inspection. This is used to develop the annual work plans.
- (b) Please refer to the Company’s response to Energy Safety Data request 2, specifically Attachment Energy Safety 2-1, which provides a copy of the miles tracker which represents the annual work plan that is developed and contains the circuits and lines that are to be inspected and worked:
 - i. Worksheet “Internal Tracker_DISTRIBUTION” provides the annual work plan for detailed inspection (VM-01).
 - ii. Worksheet “Internal Tracker_TRANSMISSION” provides the annual work plan for detailed inspection (VM-02).
- (c) Please refer to the Company’s response to Energy Safety Data Request 2, specifically Attachment Energy Safety 2-2:
 - i. Tracking ID: VM-01.

- ii. Date when vegetation condition is not consistent with Vegetation Standard Operating Procedures: column B.

- (d) Please refer to the Company's response to Energy Safety Data Request 3, specifically Attachment Energy Safety 3:
 - i. Tracking ID: VM-02.
 - ii. Date when vegetation condition is not consistent with Vegetation Standard Operating Procedures: column B.

- (e) Please refer to Attachment Energy Safety 8-2:
 - i. Tracking ID: VM-06.
 - ii. Column G: "DST" is an acronym for routine distribution maintenance conducted as a result of detailed inspection.
 - iii. Description of work completed: column P.
 - iv. Date work completed: column B.

- (f) Please refer to Attachment Energy Safety 8-3:
 - i. Tracking ID: VM-07.
 - ii. Description of work completed: column P.
 - iii. Date of work completed: column B.

Energy Safety DR-261 Data Request 9

Detailed inspections and management practices for vegetation clearances around distribution electrical lines and equipment - In its 2023-2025 WMP, PacifiCorp states, “During inspection, where corrective actions are identified, landowners are notified of the needed vegetation management work and landowner approvals obtained.” Energy Safety recognizes that PacifiCorp repeats this phrase in other subsections. For this statement, please provide the following for both detailed inspections around distribution (8.2.2.1) and transmission (8.2.2.2) electrical lines and equipment:

All instances where landowners were notified about corrective actions needed because of PacifiCorp's inspection. Include the type of corrective action taken, the date of notification to the landowner, the type of notification, and the date of landowner's approval.

Response to Energy Safety DR-261 Data Request 9

- (a) Please refer to the Company’s response to Energy Safety Data Request 2, specifically Attachment Energy Safety 2-2:
 - i. Type of notification: column I.
 - ii. Description of corrective action needed: columns R and S.
 - iii. Date of notification: column B.

- (b) Please refer to the Company’s response to Energy Safety Data Request 3, specifically Attachment Energy Safety 3:
 - i. Type of notification: column I.
 - ii. Description of corrective action needed: columns R and S.
 - iii. Date of notification: column B.

- (c) Please refer to Attachment Energy Safety 9:
 - i. PacifiCorp seeks to obtain active consent from landowners with respect to tree removals; this attachment provides examples of consent received.

Energy Safety DR-261 Data Request 10

Detailed inspections and management practices for vegetation clearances around distribution electrical lines and equipment - In its 2023-2025 WMP, PacifiCorp states, "Inspection on a transmission line is generally initiated 1-6 weeks prior to the vegetation management corrective maintenance taking place. As the inspection is completed, the work is released to the vegetation management contractor to conduct the corrective maintenance." Energy Safety recognizes that PacifiCorp repeats this phrase in other subsections. For this statement, please provide the following for both detailed inspections around distribution (8.2.2.1) and transmission (8.2.2.2) electrical lines and equipment:

Supporting documentation (i.e. Excel file) of inspections on transmission and distribution lines prior to the vegetation management corrective maintenance. Indicate the dates of the inspections and dates of work completed.

Response to Energy Safety DR-261 Data Request 10

- (a) Please refer to the Company's response to Energy Safety Data Request 2, specifically Attachment Energy Safety 2-2:
 - i. Inspection Date: column B.
- (b) Please refer to the Company's response to Energy Safety Data Request 3, specifically Attachment Energy Safety 3:
 - i. Inspection Date: column B.
- (c) Please refer to the Company's response to Energy Safety Data Request 8, specifically Attachment Energy Safety 8-2:
 - i. Date of work completed: column B.
- (d) Please refer to the Company's response to Energy Safety Data Request 8, specifically Attachment Energy Safety 8-3:
 - i. Date of work completed: column B.

Energy Safety DR-261 Data Request 11

Detailed inspections and management practices for vegetation clearances around transmission electrical lines and equipment - In its 2023-2025 WMP, PacifiCorp states, “Detailed inspections of transmission lines are generally scheduled as follows:

- Main Grid Transmission: Annually
 - Pacific Power linemen conduct annual inspection of main grid transmission lines in compliance with R4 of NERC Standard FAC-003. Pacific Power vegetation management detailed inspections supplement lineman inspections.
- Local Transmission: At a minimum once every three years, in conjunction with the distribution detailed inspection”.

Regarding these statements, provide the following: A schedule or similar supporting documentation that demonstrates detailed inspections of transmission lines scheduled Annually for Main Grid Transmissions and a minimum once every three years for Local Transmission.

Response to Energy Safety DR-261 Data Request 11

Please refer to Attachment Energy Safety 11, PacifiCorp’s Transmission and Distribution Vegetation Management Standard Operating Procedures:

- i. Section 6.3.1 Inspection Frequency, on page 48, states that Main Grid inspection takes place at least annually and Local Transmission inspection takes place with distribution cycle work. Distribution maintenance is conducted on a three-year cycle; local transmission is therefore inspected at least once every three years.

Energy Safety DR-261 Data Request 12

Detailed inspections and management practices for vegetation clearances around transmission electrical lines and equipment – In its 2023-2025 WMP, PacifiCorp states, “Additionally, limited inspections may be conducted/triggered associated with customer requests, agencies, and Pacific Power T&D Operations requests based on observed conditions and/or reliability metrics. Weather events or conditions may also trigger additional limited inspections.” Energy Safety recognizes that PacifiCorp utilizes this phrase in other subsections. For this statement, please provide the following for both detailed and patrol inspections around distribution and transmission electrical lines and equipment:

An Excel file of inspections that were conducted/triggered in association with customer request, agencies, and Pacific Power T&D Operations requests. Include the conditions observed and/or reliability metrics, and weather events or conditions if applicable.

Response to Energy Safety DR-261 Data Request 12

No ticket work was recorded associated with transmission in 2023.

- (a) Please refer to Attachment Energy Safety 12-1 which provides examples of customer requests or “tickets” that are responded to by PacifiCorp vegetation management. Tickets are inspected and vegetation conditions corrected as warranted.
- (b) Please refer to Attachment Energy Safety 12-2:
 - i. “DTK” is an acronym for ticket work on distribution lines, which includes customer requests, agency requests, and internal operations’ requests.
 - ii. Work conducted is summarized in column P.

Energy Safety DR-261 Data Request 13

Patrol inspections of vegetation around distribution electric lines and equipment -

In its 2023-2025 WMP, PacifiCorp states, “To further reduce wildfire risk in the HFTD, Pacific Power conducts annual vegetation patrol inspections, generally of distribution lines that are off cycle and of those lines where the detailed inspection is not completed prior to the height of the fire season. This WMP activity is tracked with Tracking ID# VM-03.” Regarding this statement, provide the following:

Provide documentation showing annual vegetation patrol inspections conducted in 2023. Include whether the inspection was off cycle and/or not completed prior to the height of fire season, the dates of inspection, and the tracking ID. Identify any vegetation conditions that were inconsistent with PacifiCorp’s Vegetation SOP (from any inspections under subsection 8.2.2.3), what corrections were made to minimize safety and reliability risks posed by vegetation, and the date of completion for the correction.

Response to Energy Safety DR-261 Data Request 13

- (a) Please refer to the Company’s responses to Energy Safety Data Request 4, specifically Attachment Energy Safety 4-1:
 - 1. Worksheet “Internal Tracker_F CODE.”
 - 2. “FIN” in cell Q3 is an acronym for patrol inspection and represents annual patrols conducted off-cycle associated with VM-03.
 - 3. Column R is filtered to show only distribution lines.
- (b) Please refer to the Company’s responses to Energy Safety Data Request 4, specifically Attachment Energy Safety 4-2:
 - 1. Date of inspection: column B.
 - 2. Description of vegetation conditions/work required: columns R and S.
- (c) Please refer to Attachment Energy Safety 13:
 - 1. Date of work completed: column B.
 - 2. Description of vegetation conditions/work conducted: column P

Energy Safety DR-261 Data Request 14

Patrol inspections of vegetation around distribution electric lines and equipment -

In its 2023-2025 WMP, PacifiCorp states, “Pacific Power develops a workplan identifying distribution circuits to be inspected each year (off cycle circuits).”

Regarding these statements, provide the following:

Supporting documentation of the workplan utilized in 2023 for the inspection of off cycle distribution circuits as well as all the distribution circuits inspected based off the plan. Please include the dates of the inspections and their respective tracking ID’s. To condense documentation, this information can be included in the same documentation utilized to answer question 8.

Response to Energy Safety DR-261 Data Request 14

- (a) Please refer to the Company’s response to Energy Safety Data Request 8, specifically Attachment Energy Safety 8-1:
- i. This work plan is an example of long-term planning when distribution circuits and transmission lines are scheduled for inspection. This is used to develop the annual work plans.
 - ii. Off-cycle work is represented by column headers with “F-code.”
- (b) Please refer to the Company’s response to Energy Safety Data Request 4, specifically Attachment Energy Safety 4-1:
- i. An example of an annual work plan associated with VM-03.
 - ii. Worksheet “Internal Tracker_F CODE” provides a list of distribution circuits where an off-cycle patrol was conducted.
 - iii. Column R is filtered to show only distribution line miles.
 - iv. “FIN” in cell Q3 is an acronym for patrol inspection.
 - v. “FMD” in cell R3 is an acronym for corrective work associated with patrol inspection.
- (c) Please refer to the Company’s response to Energy Safety Data Request 4, specifically Attachment Energy Safety 4-2:

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- i. This report provides inspection results or work prescribed associated with the patrol inspection of distribution lines as part of VM-03.

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.

Energy Safety DR-261 Data Request 15

Patrol inspections of vegetation around distribution electric lines and equipment -

In its 2023-2025 WMP, PacifiCorp states, “Ground inspection is initiated by the inspection contractor, who identifies vegetation conditions in accordance with Pacific Power specifications, which are consistent with applicable regulations (required clearance distances).” Energy Safety recognizes this statement is repeated in other subsections. Regarding this statement, provide the following for all detailed and patrol ground inspections of transmission and distribution lines:

An Excel file listing the results from the ground patrol inspections completed in 2023. Include the date of each ground inspection, location, and if conditions met (or failed) required clearance distances.

Response to Energy Safety DR-261 Data Request 15

PacifiCorp does not record whether a vegetation condition met or failed required clearance distances but rather identifies vegetation conditions based on specifications set forth within its standard operating procedures and work releases.

- (a) Please refer to the Company’s response to Energy Safety Data Request 2, specifically Attachment Energy Safety 2-2:
 - i. Date of inspection: column B.
 - ii. Location: columns AM and AN.
- (b) Please refer to the Company’s response to Energy Safety Data Request 3, specifically Attachment Energy Safety 3:
 - i. Date of inspection: column B.
 - ii. Location: columns AZ and BA.
- (c) Please refer to the Company’s response to Energy Safety Data Request 4, specifically Attachment Energy Safety 4-2:
 - i. Date of inspection: column B.
 - ii. Location: columns AM and AN.
- (d) Please refer to the Company’s response to Energy Safety Data Request 5, specifically Attachment Energy Safety 5-2:

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- i. Date of inspection: column B.
- ii. Location: columns AZ and BA.

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Energy Safety DR-261 Data Request 16

Patrol inspections of vegetation around distribution electric lines and equipment -

In its 2023-2025 WMP, PacifiCorp states, “Patrol inspections or “readiness patrols” are conducted annually on the entire length of circuits where they are either completely within or only a portion thereof is within HFTD where detailed inspections and associated corrective actions have not been completed or are not scheduled.” Regarding this statement, provide the following:

Provide documentation showing that PacifiCorp completed patrol inspections in 2023 on the entire length of circuits within the HFTD. Include the inspection date, number of circuit miles inspected, location, HFTD tier, and corrective actions identified.

Response to Energy Safety DR-261 Data Request 16

- (a) Please refer to the Company’s response to Energy Safety Data request 4, specifically Attachment Energy Safety 4-1:
 - 1. Worksheet “Internal Tracker_F CODE.”
 - 2. Column R is filtered to show only distribution line miles.
 - 3. Column J presents the total length of each circuit, column K presents the length of each circuit scheduled, column O presents the length of each circuit within a high fire threat district (HFTD), and column Q presents the length of each circuit where a patrol inspection was completed.
 - 4. “FIN” in cell Q3 is an acronym for patrol inspection.
 - 5. “FMD” in cell R3 is an acronym for corrective work associated with patrol inspection.
- (b) Please refer to the Company’s response to Energy Safety Data request 4, specifically Attachment Energy Safety 4-2:
 - 1. This report provides inspection results or work prescribed associated with the patrol inspection.

Energy Safety DR-261 Data Request 17

Wood and Slash Management - In its 2023-2025 WMP, PacifiCorp states, “Pacific Power manages slash in developed areas by chipping or removing (recycles where practicable) it where accessible, unless the property owner indicates otherwise. In rural, off-road areas Pacific Power uses a lop and scatter and chipping (where accessible) practice to reduce the volume of available fuel within the right-of-way and adheres with land managing agency requirements.” Regarding this statement, provide the following:

Supporting documentation (e.g., work orders, photos, etc.) of all examples where PacifiCorp conducted fuel management through the removal of slash from the tree canopy, lop and scatter, chipping of debris, and removal of slash in developed areas. Include the dates, locations (identify those in rural off-road areas), type of work that was prescribed to manage the slash (e.g. mechanical, herbicide, lop and scatter, etc.).

Response to Energy Safety DR-261 Data Request 17

PacifiCorp does not record all actions regarding wood and slash management. For example, removing slash from the canopy is an expectation and not a recorded action every time it is conducted (i.e., every time a tree is pruned). Similarly, it is an expectation that when conducting work within developed areas, that slash is chipped and hauled off site and is not documented at each location where a tree was pruned. If these actions were not conducted, they would be identified as an audit exception during post-audit of the completed work.

(a) Please refer to Attachment Energy Safety 17-1:

- i. Description of slash management is provided in column R.
- ii. Examples of chipping brush are highlighted purple.
- iii. Examples of lop and scatter are highlighted orange.

(b) Please refer to Attachment Energy Safety 17-2:

- i. This report identifies the recorded number of loads of chips taken to off-site locations for disposal.
- ii. This report does not record the location from which the chips originated, however, if chips were left in an urban setting without approval, it would be identified during the post-audit.

Energy Safety DR-261 Data Request 18

Pole Clearing - In its 2023-2025 WMP, PacifiCorp states, “Consistent with California Public Resource Code (PRC) § 4292, Pacific Power conducts pole clearing activities involving removal of all vegetation within a 10-foot radius cylinder (up to 8 feet vertically) of clear space around a subject pole, removal of dead vegetation from 8 feet to the highest point of the conductor, and applying herbicides and/or soil sterilant to prevent any vegetation regrowth (unless prohibited by law or the property owner). This WMP tracking activity is tracked with Tracking ID# VM-05.” Regarding these statements, provide the following:

Supporting documentation showing pole clearing activities involving removal of all vegetation within a 10-foot radius cylinder (up to 8 feet vertically) of clear space around a subject pole, removal of dead vegetation from 8 feet to the highest point of the conductor, and any instances in which herbicides and/or soil sterilant was applied. Include dates, type of work, and tracking ID.

Response to Energy Safety DR-261 Data Request 18

- (a) Please refer to the Company’s response to Energy Safety Data Request 1, specifically Attachment Energy Safety 1-1:
 - i. Dates of work: column A (Treatment Date).
 - ii. Herbicide application information: column N (number of poles), and columns U through AK.
- (b) Please refer to Attachment Energy Safety 18-1:
 - i. Dates of work: column A.
 - ii. Herbicide application information: column N, and columns U through AK.
- (c) Please refer to Attachment Energy Safety 18-2 which provides examples of after photos indicating vegetation clearances as a result of pole clearing activities.

Energy Safety DR-261 Data Request 19

Pole Clearing - In its 2023-2025 WMP, PacifiCorp states “In addition to state required pole clearing activities, Pacific Power addresses vegetation adjacent to “subject” poles in local responsibility areas to further reduce wildfire ignition risks and increase wildfire resiliency.” Energy Safety recognizes this statement is similar to a target mentioned in subsection 8.2.1.2 Targets. This information can be included in the same documentation utilized to answer question 1. Regarding this statement, provide the following:

Excel file exported from PacifiCorp’s vegetation management database of all the work addressing vegetation adjacent to “subject” poles in the LRA to further reduce wildfire ignition risks and increase wildfire resiliency. Include HFTD designation, LRA designation, and work completion dates for any prescribed work.

Response to Energy Safety DR-261 Data Request 19

Please refer to the Company’s response to Energy Safety Data Request 1, specifically Attachment Energy Safety 1-1:

- i. Dates of work: column A (Treatment Date).
- ii. LRA designation: column G (Work Code).
- iii. HFTD Designation: column AL

Energy Safety DR-261 Data Request 20

Clearance - In its 2023-2025 WMP, PacifiCorp states, “Pacific Power conducts cycle-based maintenance coupled with annual patrol and corrective maintenance (incremental to routine maintenance) to maintain required minimum clearance distances as identified in Table 1 of GO 95.” Regarding this statement, provide the following:

Supporting documentation showing cycle-based maintenance coupled with annual patrol and corrective maintenance was conducted to maintain required minimum clearance distances. Include the date of maintenance, location of maintenance, tracking ID, and the clearance distance achieved.

Response to Energy Safety DR-261 Data Request 20

PacifiCorp establishes post-work clearance distances in its standard operating procedures. PacifiCorp does not record clearance distances achieved at the time of pruning. If clearance distances were not achieved, they would be identified as an audit exception during post-audit where warranted.

- (a) Please refer to the Company’s response to Energy Safety Data Request 11, specifically Attachment Energy Safety 11, PacifiCorp’s Transmission and Distribution Vegetation Management Program Standard Operating Procedures:
 - i. Table 5.2 on page 37, presents post-work clearance distances associated with cycle maintenance.
- (b) Please refer to Attachment Energy Safety 20:
 - i. This report presents distribution cycle maintenance and annual patrol corrective maintenance, represented by work codes DST and FMD, respectively (work codes are in column H).
 - ii. Tracking ID: column A.
 - iii. Date of work: column C.
 - iv. Location of work: columns AI and AJ.
- (c) Please refer to the Company’s response to Energy Safety Data Request 6, specifically Attachment Energy Safety 6-2:
 - i. This report provides examples of audit findings. To see a few examples of audit findings addressing clearance distances that have not been achieved to PacifiCorp

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specifications, filter column H by color (green). Description of audit findings in column R (“Pts” is an acronym for “Prune to Specification” distances).

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.

Energy Safety DR-261 Data Request 21

Clearance - In its 2023-2025 WMP, PacifiCorp states, “Pacific Power also prunes vegetation beyond minimum required clearances in multiple ways as presented in the Vegetation SOP. First, Pacific Power uses increased clearance distances on distribution lines for certain species of trees, depending on tree growth rate. Pacific Power separates vegetation into three categories: (a) slow-growing; (b) moderate growing; and (c) fast growing. In all cases, Pacific Power applies the 12-foot minimum post-work clearance for slow-growing species. In certain cases, Pacific Power applies an increased clearance for moderate growing and fast-growing species.” To condense documentation, this information can be included in PacifiCorp’s response to question 32. Regarding these statements, provide the following:

Supporting documentation (i.e., Excel file) showing all instances where PacifiCorp pruned vegetation beyond minimum required clearances. Identify distribution or transmission lines, rate of growth, species, type of clearance used (increased or minimum), and indicate the tracking ID and initiative activity.

Response to Energy Safety DR-261 Data Request 21

- (a) Please refer to the Company’s response to Energy Safety Data Request 20, specifically Attachment Energy Safety 20:
 - i. Tracking ID: column A.
 - ii. Species: column Q.

- (b) Please refer to Attachment Energy Safety 21:
 - i. Tracking ID: column A
 - ii. Species: column Q

PacifiCorp does not record growth rates nor clearance distance achieved at time of pruning. PacifiCorp contractors achieve post work clearance distances based on their professional judgement and understanding of growth rates that they observe in the field. Post-work clearances are then field reviewed during PacifiCorp’s post-audit.

Energy Safety DR-261 Data Request 22

Clearance - In its 2023-2025 WMP, PacifiCorp states, “Third, as a practical matter, Pacific Power will often prune beyond the minimum required distances because of the physical structure of the tree. Pacific Power uses natural target pruning”. Regarding these statements, provide the following:

All examples where PacifiCorp used natural target pruning in 2023. Include the date, location, tree species, tracking ID, initiative activity, and the distance cleared.

Response to Energy Safety DR-261 Data Request 22

PacifiCorp may identify improperly pruned trees during post-audits; however, PacifiCorp does not track post work clearance distances achieved nor the use of natural target pruning techniques as metrics. Not all industry best practices are tracked. Where pruning takes place, it is expected that PacifiCorp’s contractors will utilize industry best pruning practices, including natural target pruning.

- (a) Please refer to the Company’s response to Energy Safety Data Request 20, specifically Attachments Energy Safety 20-1, and the Company’s response to Energy Safety Data Request 21, specifically Attachment Energy Safety 21-1, which provide information regarding locations of trees pruned.
- (b) Please refer to Attachment Energy Safety 22:
 - i. This report provides examples of audit findings where the auditor identified improper pruning as “stubs cuts” that the contractor was required to address.
 - ii. Audit finding description: column R

Energy Safety DR-261 Data Request 23

Clearance – In its 2023-2025 WMP, PacifiCorp states, “In order to maintain minimum required clearance distances through the cycle maintenance period, Pacific Power may also conduct additional mid-[cycle] inspection and correction activities (hotspot actions) to target cyclebusters, which are those trees that may not hold for an entire cycle (refer to Section 8.2.3.5 for addition discussion)”. Regarding these statements, provide the following:

Supporting documentation (i.e., Excel file) of all instances in which PacifiCorp conducted additional mid-cycle inspections to target cycle busters in 2023. Include tracking ID, initiative activity, the date of the inspection, location, conditions identified, and date of corrective action completion.

Response to Energy Safety DR-261 Data Request 23

PacifiCorp does not discretely track work conducted on cyclebusters as a separate work activity, however, ticket work, which includes mid-cycle hotspot work, may be conducted on cyclebusters.

(a) Please refer to Attachment Energy Safety 23-1:

- i. “DTK” is an acronym for ticket work on distribution lines, which includes customer requests, agency requests, and internal operations’ requests.
- ii. Inspection date: column B.
- iii. Location: columns AM and AN.
- iv. Conditions/description of work: columns R and S.
- v. This report contains examples of trees identified as cyclebusters in column T.

(b) Please refer to Attachment Energy Safety 23-2:

- i. This report presents the work completed at the example locations identified in Attachment Energy Safety 23-1.
- ii. Date of corrective action completed: column B

Energy Safety DR-261 Data Request 24

Fall-In Mitigation - In its 2023-2025 WMP, PacifiCorp states, “Pacific Power identifies and addresses fall-in risk, or hazard trees as part of routine maintenance (detailed inspections) and annual patrols (circuits within or partially within HFTD). Hazard trees identified during inspections are removed or pruned sufficiently to eliminate the hazard. In addition to inspections conducted by vegetation management contractors/personnel, Pacific Power district operations (through line inspections they conduct), customers, agencies, etc., may identify fall-in risk conditions that are vetted by vegetation management and mitigated as warranted”. Regarding these statements, provide the following:

Supporting documentation showing the total number of hazard trees identified, addressed, and removed during routine maintenance (detailed inspections) and annual patrols (circuits within or partially within HFTD) in 2023. Include dates of removal or pruned work that sufficiently eliminated the hazard. Additionally, identify any fall-in risk conditions that were vetted and mitigated as warranted by vegetation management.

Response to Energy Safety DR-261 Data Request 24

- (a) Please refer to the Company’s response to Energy Safety Data Request 20, specifically Attachment Energy Safety 20:
- i. Hazard trees:
 1. Removal Date: column C (Date Work Completed).
 2. Total number of hazard trees (reliability removals) addressed was 3,699:
 - a. Sum of cells AE2, AF2 and AG2.
 - ii. Fall-in risk (in addition to hazard trees), PacifiCorp identified reliability prunes, which typically include healthy trees with a dead limb within strike distance of conductor upon failure:
 1. Removal/prune Date: column C.
 2. Total number of reliability prunes addressed was 677:
 - a. Sum of cells AA2, AB2 and AC2.
- (b) Please refer to the Company’s response to Energy Safety Data Request 21, specifically Attachment Energy Safety 21:

- i. Hazard trees:
 1. Removal Date: column C.
 2. Total number of hazard trees (reliability removals) addressed was 1,396:
 - a. Sum of cells AH2, AI2 and AJ2.
- ii. Fall-in risk (in addition to hazard trees), PacifiCorp identified reliability prunes, which typically include healthy trees with a dead limb within strike distance of conductor upon failure:
 1. Removal/prune Date: column C.
 2. Total number of reliability prunes addressed was 67:
 - a. Sum of cells AD2, AE2 and AF2.

Energy Safety DR-261 Data Request 25

8.2.3.4 Substation Defensible Space - In its 2023-2025 WMP, PacifiCorp states, “Pacific Power 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.” Regarding this statement, provide the following:

An Excel file of all substation inspections performed in 2023 to remove vegetation. Include the date of the substation inspection, date of vegetation removal, and the corrective work conducted.

Response to Energy Safety DR-261 Data Request 25

PacifiCorp vegetation management does not discretely track inspection of substation perimeters as these inspections are part of inspections conducted of lines entering and exiting the substations, PacifiCorp however does discretely track inspections of substations conducted by Substation Operations. During these inspections any vegetation conditions identified would be communicated to the vegetation management department.

(a) Please refer to Attachment Energy Safety 25:

i. List of substation inspections.

(b) Any work that would have been conducted as a result of these inspections or vegetation management conducted inspections are not geospatially tied to the substation within PacifiCorp’s database.

Energy Safety DR-261 Data Request 26

8.2.3.5 At-Risk Species - In its 2023-2025 WMP, PacifiCorp states, “Within the HFTD, pruning is performed to prevent vegetation from breaching a 4-foot minimum clearance within one year. This may require additional pruning for at-risk species with very fast growth rates. Pre-listers also identify discretionary removals of at-risk species to eliminate ignition risk and need for cyclical pruning”. Regarding these statements, provide the following:

Supporting documentation of all pruning performed to prevent vegetation from breaching a 4-foot minimum clearance within one year in the HFTD. Include the date of work completed, HFTD tier, any additional pruning for at-risk species (please identify) with very fast growth rates, and any discretionary removals of at-risk species.

Response to Energy Safety DR-261 Data Request 26

PacifiCorp’s off-cycle patrol inspections are designed to identify vegetation that has encroached upon or will encroach upon the four-foot minimum clearance distance prior to the next scheduled work in a high fire threat district (HFTD) in addition to identification of hazard trees. In addition, routine maintenance as a result of detailed inspections support maintaining minimum clearance distance of four feet. Pruning or removal of at-risk species is not discretely tracked and is embedded within other work activities.

- (a) Please refer to the Company’s response to Energy Safety Data Request 13, specifically Attachment Energy Safety 13:
 - i. Date of Work: column B.
 - ii. Discretionary removals are categorized as non-hazard tree removals and are identified in columns V, W and X.

- (b) Please refer to the Company’s response to Energy Safety Data Request 20, specifically Attachment Energy Safety 20:
 - i. Date of Work: column B.
 - ii. Discretionary removals are categorized as non-hazard tree removals and are identified in columns V, W and X.

Energy Safety DR-261 Data Request 27

8.2.3.6 Fire Resilient Right-of-Ways - In its 2023-2025 WMP, PacifiCorp states, “Pacific Power utilizes integrated vegetation management (IVM) best practices to manage vegetation in which undesirable vegetation is identified and selected control(s) are implemented, consistent with the American National Standards Institute guidance.” Regarding this statement, provide the following:

Supporting documentation listing the IVM best practices as well as the vegetation management activities they assist in managing.

Response to Energy Safety DR-261 Data Request 27

Integrated Vegetation Management (IVM) is an industry best management practice defined by the American National Standards Institute (ANSI A300, Part 7) and referenced in the ANSI A300, Part 7 companion publication ([IVM Third Edition, Best Management Practices, 2021](#))¹ as “a system of managing plant communities in which compatible and incompatible vegetation are identified; action thresholds are determined; tolerance levels are established; and control methods are evaluated, selected, and applied to achieve management goals and maintenance objectives.” [ANSI A300, Tree Care Standards, 2023](#)² identifies practices to include:

- (a) Communications and stakeholder engagement.
- (b) Determination of tolerance and action levels.
- (c) Treatment methods:
 - i. Biological, chemical, cultural, prescribed fire, physical

The listed IVM practices are used to support achieving desired outcomes or management objectives, such as control of incompatible species, maintain right-of-way (ROW) access, identify and remove hazard trees, improve electric reliability, reduce wildfire ignition risk, and promote compatible species within the ROW. IVM practices and principles are applied where applicable and practicable during routine maintenance, annual patrol corrective actions, and transmission ROW projects, such as mechanical mowing and herbicide (chemical) applications.

¹ <https://www.isa-arbor.com/store/product/101/>

² <https://www.isa-arbor.com/store/product/4645>

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8.2.3.6 Fire Resilient Right-of-Ways - In its 2023-2025 WMP, PacifiCorp states, “In addition, Pacific Power promotes right tree in right place or small trees for small places concepts with customers coupled with our tree replacement voucher program. Tree replacement vouchers may be provided to customers on a case-by-case basis to offset removal of incompatible species within or adjacent to the right-of-way. Pacific Power provides information to customers regarding vegetation that is compatible with utility rights-of-way and coordinates with communities through Arbor Day functions or other educational outreach opportunities. Regarding these statements, provide the following:

Provide the total number of instances in which PacifiCorp gave customers tree replacement vouchers. Include all documentation provided to the customer regarding compatible trees with utility rights-of-way, the incompatible species on the customer’s property, and date of removal and replacement.

Response to Energy Safety DR-261 Data Request 28

Trees that are removed by PacifiCorp are generally deemed incompatible (hazard trees or discretionary removals). Please refer to the Company’s response to Energy Safety Data Request 24 which provides date of removal information. Replacement is tracked via issuance of tree coupons/vouchers. Please refer to the Company’s response subpart (b) below which provides date of voucher issuance. PacifiCorp does not track customer conducted replacements or plantings.

(a) Please refer to Attachment Energy Safety 28-1:

- i. This report lists tree coupons/vouchers that were provided to customers and stakeholders in 2023.
- ii. 66 vouchers were provided to customers.

(b) Example documentation available to customers includes the following:

- i. Please refer to Attachment Energy Safety 28-2.
- ii. Please refer to Attachment Energy Safety 28-3.

Energy Safety DR-261 Data Request 29

8.2.3.7 Emergency Response of Vegetation Management - In its 2023-2025 WMP, PacifiCorp states, “Pacific Power has developed daily weather briefings that provide weather forecast information as a tool for management/response-based decision making. Based on these weather forecasts and at times of elevated risk, vegetation management actions may be taken, including targeted patrols to identify and address potential ignition risks due to vegetation and inform decision making (including PSPS events). These patrols may be performed throughout the weather event and/or PSPS event and are initiated and prioritized based on risk and situational awareness.” Regarding these statements, provide the following:

Did PacifiCorp experience any PSPS or elevated weather events in 2023? If so, how many? Include supporting documentation of targeted patrols being utilized during the PSPS or elevated weather events, if applicable.

Response to Energy Safety DR-261 Data Request 29

PacifiCorp did not experience any public safety power shutoff (PSPS) events or weather conditions (elevated wildfire ignition risk conditions) in 2023 that triggered targeted patrols conducted by vegetation management.

Energy Safety DR-261 Data Request 30

8.2.3.7 Emergency Response of Vegetation – In its 2023-2025 WMP, PacifiCorp states, “Regarding response to wildfires, Pacific Power foresters and/or vegetation management contractors patrol wildfire-impacted areas adjacent to electrical infrastructure to identify trees impacted by fire within strike distance of electrical infrastructure, determine risk, and determine strategy for mitigating the identified risk. Trees that pose an imminent risk are topped or felled to eliminate the risk as soon as practicable. Depending on the risk identified and considering other factors such as land ownership and environmental concerns, other mitigation efforts to address remaining fire-impacted trees may occur.” Regarding this statement, provide the following:

Supporting documentation extracted from PacifiCorp’s vegetation management database listing all trees identified as posing an imminent risk in wildfire-impacted areas adjacent to electrical infrastructure. Include the date of patrol, wildfire-impacted area, risk, type of corrective action, and date of mitigation.

Response to Energy Safety DR-261 Data Request 30

In 2023, PacifiCorp conducted vegetation management actions, including inspection and mitigation of fire impacted trees in response to the following wildfires.

(a) Head Fire:

- i. Please refer to the responses below:
 1. Please refer to Attachment Energy Safety 30-1:
 - a. Date of patrol: column B.
 - b. Description of corrective action: column S.
 - c. Risk: column R:
 - i. P1: Priority 1.
 - ii. P2: Priority 2.
 2. Please refer to Attachment Energy Safety 30-2:
 - a. Date of patrol: column B.
 - b. Description of corrective action: column S.

3. Please refer to Attachment Energy Safety 30-3:

a. Date of mitigation: column B.

4. Please refer to Attachment Energy Safety 30-4:

a. Date of mitigation: column B.

(b) Smith River Complex Fire:

i. Transmission: PacifiCorp contracted the inspection and correction work along transmission and utilized the contractor's mobile data management software tools. The following attachment identifies the work locations identified by the contractor and mitigated.

1. Please refer to Attachment Energy Safety 30-5:

a. Date of patrol: column E.

b. Description of corrective action: column L.

c. Risk: column H:

i. P1: Priority 1.

ii. P2: Priority 2.

d. Date of mitigation: column W.

ii. Please refer to the responses below:

1. Distribution:

a. Please refer to Attachment Energy Safety 30-6:

i. Date of patrol: column B.

ii. Description of corrective action: column S.

iii. Risk: column R (where noted):

1. P1: Priority 1.

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2. P2: Priority 2.
 - b. Please refer to Attachment Energy Safety 30-7:
 - i. Date of mitigation: column B.

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.

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8.2.4 Vegetation Management Enterprise System – In its 2023-2025 WMP, PacifiCorp states, “Pacific Power seeks opportunities to refine the MDMS data collection process through creating new forms or updating existing forms to capture additional data fields as data gaps are identified to allow for informed vegetation management program decision making. Pacific Power has updated several forms including the inventory, work complete, adder request, audit exception, tree coupon (voucher) and property owner refusal to enhance data collection and tracking capabilities”. Regarding these statements, provide the following:

Supporting documentation extracted from MDMS showing any data gaps that were identified and the specific improvements PacifiCorp made in response to these gaps.

Response to Energy Safety DR-261 Data Request 31

The following are examples of improvements to data collection processes that PacifiCorp implemented in 2023:

- (a) New Pole Clearing Notification and Pole Treatment Detail Forms were developed to improved data collection regarding exempt and non-exempt poles and pole clearing actions by work code (pole clearing program).
- (b) Please refer to the responses below:
 - i. Please refer to Attachment Energy Safety 31-1:
 - 1. Email correspondence documenting new form development.
 - ii. Please refer to Attachment Energy Safety 31-2:
 - 1. Example of the notification report developed and implemented; attachment provides the headers or data fields.
 - iii. Please refer to Attachment Energy Safety 31-3:
 - 1. Example of treatment detail report developed and implemented; attachment provides the headers or data fields

Energy Safety DR-261 Data Request 32

8.2.5 Quality Assurance and Quality Control - In its 2023-2025 WMP, PacifiCorp states, “Post-audits are completed annually and include review of routine maintenance (work identified during detailed inspections) and additional work completed annually within the HFTD (work identified during patrol inspections)”. Regarding this statement, provide the following:

All post-audit results for detailed and patrol inspections in 2023. Include the date of the audit, work identified, location, and corrective actions taken.

Response to Energy Safety DR-261 Data Request 32

Please refer to Attachment Energy Safety 32:

- i. Date of audit findings: column B.
- ii. Location: columns AN and AO.
- iii. Work identified and action to be taken: columns R and S.

Energy Safety DR-261 Data Request 33

8.2.5 Quality Assurance and Quality Control - In its 2023-2025 WMP, PacifiCorp states, “The staff conducting post-audits record work exceptions (inconsistencies with Pacific Power specifications or work missed) using the MDMS. The audit exceptions are then visible to the vegetation management contractor within the MDMS and assigned to that contractor, who remains responsible for the work, including any corrective action”. Regarding this statement, provide the following:

Supporting documentation extracted from MDMS showing that PacifiCorp recorded work exceptions. Include the corrective actions done by the vegetation management contractor once the audit exception was assigned to them.

Response to Energy Safety DR-261 Data Request 33

- (a) Please refer to the Company’s response to Energy Safety Data Request 32, specifically Attachment Energy Safety 32:
 - i. Documentation that PacifiCorp recorded work exceptions as part of its post-audit activity.

- (b) Please refer to Attachment Energy Safety 33-1:
 - i. Records work completed associated with audit exceptions in addition to work completed associated with detailed inspections and patrol inspections.
 - ii. Generally, the map object ID in the “PpAuditException” report (column AQ of Attachment 8.2.5_Q32_PpAuditException_2023) will correspond to the map object ID in the work complete report (column AK, cells highlighted blue), tying together the audit exception and corrective work conducted in response to the audit exception.

- (c) Please refer to Attachment Energy Safety 33-2:
 - i. Records work completed associated with audit exceptions in addition to work completed associated with detailed inspections and patrol inspections.
 - ii. Generally, the map object ID in the “PpAuditException” report (column AQ of Attachment 8.2.5_Q32_PpAuditException_2023) will correspond to the map object ID in the work complete report (column AN, cells highlighted blue), tying together the audit exception and corrective work conducted in response to the audit exception.

Energy Safety DR-261 Data Request 34

8.2.6 Open Work Orders - In its 2023-2025 WMP, PacifiCorp states, “In 2022, Pacific Power created a report that links forms (e.g., inventory and work complete) at a work location. In 2023, this report will be reviewed and modified to allow for tracking of open work locations (locations without a work complete form) to help drive completion of any open work locations prior to end of each calendar year.” Regarding these statements, provide the following:

The modified report used in 2023 extracted from PacifiCorp’s database MDMS showing the tracking of open work locations. Include the report used in 2022 for comparison.

Response to Energy Safety DR-261 Data Request 34

The following reports were run for the same arbitrary time period (January 1, 2023 through March 1, 2023) using Circuit 5G33 as an example.

(a) Please refer to Attachment Energy Safety 34-1:

- i. Version of report available for use in 2022.

(b) Please refer to Attachment Energy Safety 34-2:

- i. Version of the report available for use in 2023.
- ii. This report was formatted to be more user friendly and added conditional formatting to highlight discrepancies for further review.
- iii. This report is best run at the individual circuit level (inspection start date and tree work completion date is required).

Energy Safety DR-261 Data Request 35

8.2.7 Workforce Planning – In its 2023-2025 WMP, PacifiCorp states, “Pacific Power requires that its utility foresters are certified arborists and certified utility specialists by the International Society of Arboriculture (ISA). Pacific Power is not directly responsible for the training of the vegetation management workforce, who are employees of an independent contractor, however, does provide annual environmental awareness training and conducts audits and crew visits, which may lead to discussions and opportunities for improvement.”

An Excel file listing all PacifiCorp foresters along with their ISA certifications. Additionally, provide supporting documentation of PacifiCorp’s annual environmental awareness trainings (i.e. agendas, presentations, handouts, etc. dated for 2023).

Response to Energy Safety DR-261 Data Request 35

(a) Please refer to Attachment Energy Safety 35-1:

- i. List of foresters, the primary assigned state(s), and International Society of Arboriculture (ISA) certification status.

(b) Please refer to Attachment Energy Safety 35-2:

- i. Example of rosters documenting training event of contractors