**CalAdvocates Data Request 3.9**

**PacifiCorp’s Asset Management and Inspections –** PacifiCorp states the following in its 2025 WMP update on p. 180:

“In response to PC 23-12, in 2024, to update the imminent threat condition code, procedures were developed to be able to capture the imminent threat conditions at the time of identification along with entering the data into the official system of record, Facility Point Inspection (FPI). All policies and procedures have been updated and training materials are currently being updated to reflect new policies. Starting in 2025, all level 1 conditions will be tracked separately from priority A conditions.”

1. Please provide the procedures PacifiCorp has developed to capture the imminent threat conditions.
2. Please explain why level 1 conditions will be tracked separately from priority A conditions.
3. Please specify how PacifiCorp will differentiate A priority conditions that are “imminent” from “non-imminent” threat conditions.

**Response to CalAdvocates Data Request 3.9**

1. PacifiCorp created a new priority code for imminent threat conditions. The new priority code is referenced as I-priority. This new priority code is in addition to PacifiCorp’s traditional A/B/C priority codes. Prior to this change, imminent threat conditions were recorded and documented as A-priorities, which captured both imminent threat conditions and other high-risk conditions that were not deemed an imminent threat. PacifiCorp’s Asset Management policy 192 was updated to reflect the new priority code, the Facility Point Inspection (FPI) system along with inspection mobile tools were modified such that inspectors can record the new priority code. PacifiCorp’s Procedure 069 was also modified to include descriptions, along with example photos of imminent threat conditions. Inspection training materials are also being updated to reflect the new priority code.
2. PacifiCorp separated Level 1 conditions from “A” priorities because not all “A” priorities are considered an imminent threat. Level 1 priorities will be documented as “I” priorities. Level 2 priorities will be documented as either “A” or “B” priorities. PacifiCorp will continue the use of “A” and “B” priorities for the intent of correcting some Level 2 conditions sooner than others. Please refer to PacifiCorp’s Asset Management Policy 192 for more details; a copy of which is provided with the Company’s response to CalAdvocates Data Request 3.8.
3. In accordance with the updated PacifiCorp Asset Management Policy 192, imminent threat will be differentiated from “A” priorities as follows:
* **Priority I** – Conditions where there’s an imminent threat to safety or reliability with a high probability of significant impact. “I” priorities align with General Order (GO) 95 Level 1 priority levels (GO95-18-B-1-a). These conditions pose a significant present threat to human life or property and corrective action shall be taken immediately, either by fully repairing or by temporarily repairing and reclassifying the condition to a lower priority.
* **Priority A** – Conditions where there’s moderate to high risk of potential impact to safety or reliability but are not imminent and do not require immediate repair. “A” priorities align with GO95 Level 2 priorities (GO95-18-B-1-a).