

OEIS Data Request 3.1

Covered Conductor Implementation (follow-up questions)

- (a) In Data Request 002, Q02, Energy Safety requested PacifiCorp to explain, “How does PC plan to achieve its overall covered conductor target in 2022 (e.g., 112 miles in 2022)?” In response to this question, PacifiCorp provided information on its plans to contract with a Construction Management Partner early 2023. PacifiCorp also provided a graphical representation (figure 1) of the planned schedule for this work.
- i. In figure 1, construction of the 112 circuit miles targeted for 2022 is shown to be completed between January 7, 2022, and May 26, 2022. Has this work been completed? Was this work completed by this milestone? If the work was not completed by May 26 this year, explain why it was not completed.
 - ii. If the targeted 112 circuit miles of covered conductor was not completed by May 26, 2022, will it be completed by the end of this year? If this work will not be completed by the end of this year, explain why not.

Response to OEIS Data Request 3.1

The Company assumes that the reference to “Data Request 002, Q02” is intended to be a reference to OEIS Data Request 2.2. Based on the foregoing assumption, the Company responds as follows:

- i. The graphical representation was to describe a typical project timeline and was not specific to any one of the 2022 covered conductor projects. The Q2 2022 quarterly initiative update states that 31 miles were planned to be completed by May 26, 2022, but 26 miles were actually completed. The Company did not complete five miles on time, however, the Company continues to work on the 2022 scope which will through December 31, 2022. PacifiCorp was impacted by material shortages, damages, and evacuations due to recent fires, delays in permitting, as well as construction firms which are also facing resources constraints. PacifiCorp is currently assessing the impact on project schedules and evaluating alternatives to bring the project back on track.
- ii. As stated in the Q2 2022 quarterly initiative update, PacifiCorp was planning to complete 31 miles of covered conductor by Q2 2022, and to complete the 112 line miles by end of calendar year. At this time, due to the reasons mentioned in the Company’s response to subpart (i) above, PacifiCorp anticipates completing the full planned 112 miles by Q2 2023.

OEIS Data Request 3.2

Pole Replacement Implementation

- (a) PacifiCorp has set the target of replacing 2,020 poles by the end of this year. Will PacifiCorp be able to accomplish this goal by the end of 2022? What is the status of this program? How many poles have been replaced to date and when will the remaining poles be replaced?

Response to OEIS Data Request 3.2

- (a) As of June 30, 2022, PacifiCorp has completed 612 pole replacements as reported on the Q2 2022 quarterly initiative update. PacifiCorp will continue to work on the pole replacement project through to the end of the year, and expects the 2,020 pole replacements to be completed by Q2 2023.

OEIS Data Request 3.3

Provide RSE Values

- (a) During a weekly call with PacifiCorp and Energy Safety, that took place on June 1, 2022, the following information was provided, “Last year we believed our LRAM would turn into a RSE generating machine, then in late 2021/early 2022 the company pivoted on what risk modeling looks like for us. We decided to change our approach to be in line with what the other utilities were doing using the Technosylva tools... Our goal now is to bring on Technosylva, we’re working on a contract for the WRRM model”.

Provide an update on the status of your plan to acquire new modeling tools that will provide you with the ability to calculate RSE values.

- (b) During this same call, PacifiCorp stated something along the lines that it “could probably provide qualitative risk reduction estimate with what we have now, but it wouldn’t be a meaningful and sustainable number (i.e., qualitative)”.

Provide these risk reduction estimates for wildfire initiatives as best as possible. At a minimum, this should include covered conductor and undergrounding. If more time is required, provide an explanation and timeline for when PacifiCorp thinks it will be able to provide such estimates.

Response to OEIS Data Request 3.3

- (a) PacifiCorp has completed procurement of Technosylva Wildfire Risk Reduction Model (WRRM) with planned release to operations and use for risk modeling and preliminary Risk-Spend Efficiency (RSE) calculations beginning in Q1 2023. PacifiCorp will continue to mature its RSE methodology based on these initial results and lessons learned from other utilities during working group meetings and benchmarking discussions.
- (b) Please refer to the table provided below. As discussed in the Company’s response to subpart (a) above, PacifiCorp is currently updating its risk assessment and mitigation effectiveness methodologies. The information presented below is historical and subject to change as part of overall changes to RSE calculations used by PacifiCorp for project planning and prioritization:

Initiative	Average RSE	None	Tier 2	Tier 3	Territory
Covered conductor	4.32	2.36	4.27	7.45	3.20
Undergrounding	1.45	0.94	1.45	2.26	1.16