**OEIS Data Request 1.4**

**PacifiCorp’s expansion of vegetation patrol inspections to the entire territory, including the newly defined HFRA:** In Table 3 of its 2025 WMP Update, PacifiCorp indicates 120 transmission line miles and 488 distribution lines miles are included in the newly defined HFRA. PacifiCorp’s 2023-2025 Base WMP redline indicates that patrol inspections (VM-03 and VM-04) will occur in the newly defined HFRA and in the non-HFTD/HFRA. However, the narrative discussion describes conducting patrol inspections only on the portion of the lines within the HFTD. Furthermore, 2025 end of year circuit mile targets are unchanged.

1. Clarify whether patrol inspections (VM-03 and VM-04) will occur in the HFRA and/or the non-HFTD/HFRA in 2025.  
   1. If patrol inspections will occur beyond the HFTD in 2025, explain why 2025 end of-year targets for VM-03 and VM-04 are unchanged.
   2. If patrol inspections will occur beyond the HFTD in 2025, explain why expenditures related to patrol inspections are unchanged.
   3. If patrol inspections will not occur beyond the HFTD in 2025, clarify the information provided in the unnamed table found on pp. 137-141 of PacifiCorp’s updated 2023-2025 WMP.
2. Populate the empty cells of the table below:

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| **Initiative** | **2025 Target**  **(Circuit Miles)** | **Circuit Miles**  **of 2025 Target in HFTD** | **Circuit Miles**  **of 2025 Target in HFRA** | **Circuit Miles of 2025**  **Target in Non- HFTD/HFRA** |
| **Patrol Inspections – Distribution (VM-03)** | 922 |  |  |  |
| **Patrol Inspections –**  **Transmission (VM- 04)** | 329 |  |  |  |

**Response to OEIS Data Request 1.4**

1. Patrol inspections in 2025 will take place in high fire threat districts (HFTD), high fire risk areas (HFRA), and non-HFTD/HFRA. PacifiCorp treats a circuit that may only have a portion of the line within a HFTD or HFRA as though the entire line is within a HFTD or HFRA (electrically connected concept).  
   1. PacifiCorp will provide updated targets in the Q2 2024 Quarterly Data Report (QDR) submittal. Targets were not updated with HFRA totals.
   2. Updated forecasted expenditures will be provided in the Q2 2024 QDR submittal. Forecasted expenditures were not flagged in the 2025 Wildfire Mitigation Plan (WMP) update as the change in forecasted expenditure did not meet the 20 percent change threshold for reporting. Also, as described in PacifiCorp’s 2025 WMP, if a portion of a distribution line is within a HFTD, the entire distribution line is treated as though it is in a HFTD and inspected under initiative VM-03. Therefore, line miles beyond HFTDs were included in the forecasted expenditures.
   3. Patrol inspections are currently planned to occur beyond HFTDs in 2025. In addition, tree work conducted as a result of patrol inspections that occur in HFRAs, will be targeted for post audit as part of initiative VM-11.
2. NOTE: Targets provided in the Company’s Wildfire Mitigation Plan were not finalized and will be updated in PacifiCorp’s Q2 2024 QDR submittal. Please refer to the below table, which is provided for reference:

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| **Initiative** | **2025 Target (Circuit Miles)** | **Circuit Miles of 2025 Target in HFTD** | **Circuit Miles of 2025 Target in HFRA** | **Circuit Miles of 2025 Target in Non-HFTD/HFRA** |
| **Patrol Inspections – Distribution (VM-03)** | 1,182 | 676 | 161 | 346 |
| **Patrol Inspections – Transmission (VM04)** | 417 | 299 | 6 | 111 |