

**CalPA Data Request 17.1**

On June 14, 2022, PacifiCorp submitted its 1st Supplemental Response to Cal Advocates Data Request, CalAdvocates-PacifiCorp-2022WMP-06. In its response to Question 6.1, PacifiCorp submitted a privilege log with one entry including document “Memorandum Regarding Slater Fire Investigation” (Memorandum). The “Date” section of this entry provides no dates of the Memorandum and says, “Memorandum remains in draft form and all prior draft versions are incorporated”.

Please provide complete privilege log entries, including dates, of all withheld drafts of the Memorandum Regarding Slater Fire Investigation. This includes prior and current drafts.

**Response to CalPA Data Request 17.1**

The Company assumes that the reference to “1st Supplemental Response to Cal Advocates Data Request, CalAdvocates-PacifiCorp-2022WMP-06” and “Question 6.1” is intended to be reference to the Company’s 1<sup>st</sup> Supplemental response to CalPA Data Request 6.1. Based on the foregoing assumption, the Company responds as follows:

PacifiCorp maintains its prior objections based on the attorney-client privilege and the attorney work-product doctrine. Subject to and without waiving those objections, PacifiCorp provides the following additional information:

<b>Document Title</b>	<b>Author</b>	<b>From</b>	<b>To</b>	<b>Date</b>
Memorandum Regarding Slater Fire Investigation	Hueston Hennigan LLP	Derek Flores	PacifiCorp Office of General Counsel	November 2, 2020
Memorandum Regarding Slater Fire Investigation	Hueston Hennigan LLP	Derek Flores	PacifiCorp Office of General Counsel	November 13, 2020
Memorandum Regarding Slater Fire Investigation	Hueston Hennigan LLP	Derek Flores	PacifiCorp Office of General Counsel	November 20, 2020
Memorandum Regarding Slater Fire Investigation	Hueston Hennigan LLP	Derek Flores	PacifiCorp Office of General Counsel	December 14, 2020
Memorandum Regarding Slater Fire Investigation	Hueston Hennigan LLP	Derek Flores	PacifiCorp Office of General Counsel	January 4, 2021
Memorandum Regarding Slater Fire Investigation	Hueston Hennigan LLP	Derek Flores	PacifiCorp Office of General Counsel	February 22, 2021
Memorandum	Hueston Hennigan LLP	Derek Flores	PacifiCorp Office	April 26, 2021

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.

2022 WMPs/ PacifiCorp

August 3, 2022

CalAdvocates-PacifiCorp-2022WMP-17 – 17.1

<b>Document Title</b>	<b>Author</b>	<b>From</b>	<b>To</b>	<b>Date</b>
Regarding Slater Fire Investigation			of General Counsel	
Memorandum Regarding Slater Fire Investigation	Hueston Hennigan LLP	Derek Flores	PacifiCorp Office of General Counsel	August 27, 2021
Memorandum Regarding Slater Fire Investigation	Hueston Hennigan LLP	Mike Behrens and Derek Flores	PacifiCorp Office of General Counsel	November 1, 2021
Memorandum Regarding Slater Fire Investigation	Hueston Hennigan LLP	Derek Flores	PacifiCorp Office of General Counsel	June 9, 2022

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2022 WMPs/ PacifiCorp  
August 3, 2022  
CalAdvocates-PacifiCorp-2022WMP-17 – 17.2

### **CalPA Data Request 17.2**

If applicable, please provide complete privilege log entries for any other withheld materials (besides the Memorandum Regarding Slater Fire Investigation) responsive to data request CalAdvocates-PacifiCorp-2022WMP-06.

### **Response to CalPA Data Request 17.2**

The Company assumes that the reference to “data request CalAdvocates-PacifiCorp-2022WMP-06” is intended to be reference to CalPA Data Request Set 6 (1 to 4). Based on the foregoing assumption, the Company responds as follows:

PacifiCorp maintains its prior objections to CalPA Data Request Set 6 (1 to 4) based on the attorney-client privilege and the attorney work-product doctrine. Subject to and without waiving those objections, PacifiCorp provides the following response:

Not applicable.

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.

2022 WMPs/ PacifiCorp  
August 3, 2022  
CalAdvocates-PacifiCorp-2022WMP-17 – 17.3

### **CalPA Data Request 17.3**

If applicable, please provide complete privilege log entries for any other withheld materials (besides the Memorandum Regarding Slater Fire Investigation) responsive to data request CalAdvocates-PacifiCorp-2022WMP-11.

### **Response to CalPA Data Request 17.3**

The Company assumes that the reference to “data request CalAdvocates-PacifiCorp-2022WMP-11” is intended to be reference to CalPA Data Request Set 11 (1 to 8). Based on the foregoing assumption, the Company responds as follows:

PacifiCorp maintains its prior objections to CalPA Data Request Set 11 (1 to 8) based on the attorney-client privilege and the attorney work-product doctrine. Subject to and without waiving those objections, PacifiCorp provides the following response:

Not applicable.

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.