

CalPA Data Request 22.1

The following questions pertain to PacifiCorp’s WMP Quarterly Initiative Update for the 2nd quarter (Q2) of 2022, filed with Energy Safety on August 22, 2022 (Excel spreadsheet named “PC_2022_Q2QIU_R0.XLSX”).

PacifiCorp reports, in cell S5, a total of 926 intrusive pole inspections that were completed as of Q2. PacifiCorp forecasted completing 2,380 intrusive pole inspections by the end of Q2.¹

- (a) Please explain why PacifiCorp has failed to achieve its Q2 target for this intrusive pole inspection initiative. Identify each factor that contributed to PacifiCorp’s missed target for this initiative in the first half of 2022.
- (b) Does PacifiCorp plan to conduct the remaining 1,454 intrusive pole inspections in Q3 of 2022?
- (c) If the answer to subpart (b) is “yes”, describe PacifiCorp’s plan to finish the uncompleted intrusive pole inspections.
- (d) If the answer to subpart (b) is “no”, explain why not.
- (e) Does PacifiCorp expect to be back on track with its Q3 target for intrusive pole inspections by the end of Q3?
- (f) If the answer to subpart (e) is “no”, explain why not.
- (g) State the specific date when PacifiCorp expects completion of its intrusive pole inspections to be back on track (consistent with the targets set in PacifiCorp’s 2022 WMP Update Revision).

Response to CalPA Data Request 22.1

- (a) PacifiCorp looks at its inspection plan from a yearly perspective not quarterly. Although there are monthly requirements for distribution, the Company’s inspectors often inspect multiple states and regions in one year. While PacifiCorp’s aim is to provide an accurate quarterly target months prior to the start of the planned inspection year, these targets are only projections based on data available at the time the plan is generated. There are several factors that can affect the data and result in the quarterly target being lower which include district management requests, personnel shortages/absences, and access issues (weather, fire, customers, etc.). Several of these factors occurred during the intrusive pole inspections to be completed in Q2 2022

¹ PacifiCorp’s Excel Spreadsheet, PC_2022_Q2QIU_R0.XLSX, Tab labelled Initiatives, Cell O5.

which resulted in the quarterly target not being met.

In addition to the above mentioned factors, the pole test and treat counts in this report include both transmission and distribution together which are inspected on different cycles and at different times. This is unlike the other inspection types, which are split and represented in different rows. This resulted in a higher quarterly target projection for Q2 2022 which also contributed in quarterly target not being met.

- (b) PacifiCorp has updated current pole test and treat counts as of August 29, 2022 at 8pm. Note: at the time of providing the information in the table below, there is still one month left in Q3 2022, but the Company is on target to finish all inspections.

Quarter	Count	Notes
2022-Q1	489	
2022-Q2	437	
2022-Q3	<u>1,506</u>	as of August 29, 2022, 8pm
	2,432	

- (c) Please refer to the Company's responses to subparts (a) and (b) above.
- (d) Please refer to the Company's responses to subparts (a) and (b) above.
- (e) Please refer to the Company's responses to subparts (a) and (b) above.
- (f) Please refer to the Company's responses to subparts (a) and (b) above.
- (g) Please refer to the Company's responses to subparts (a) and (b) above.

CalPA Data Request 22.2

The following questions pertain to PacifiCorp’s WMP Quarterly Initiative Update for the 2nd quarter (Q2) of 2022, filed with Energy Safety on August 22, 2022 (Excel spreadsheet named “PC_2022_Q2QIU_R0.XLSX”).

- (a) Please provide the number of intrusive pole inspections that have resulted in a pole rejection in the first half of 2022.
- (b) Please disaggregate the figure in subpart (a) by HFTD tier, as defined above in definitions O through S.
- (c) Please provide the number of rejected poles that have been replaced as a result of intrusive pole inspections in the first half of 2022
- (d) Please disaggregate the figure in subpart (c) by HFTD tier, as defined above in definitions O through S.
- (e) Please provide the number of rejected poles that have been reinforced as a result of intrusive pole inspections in the first half of 2022.
- (f) Please disaggregate the figure in subpart (e) by HFTD tier, as defined above in definitions O through S.

Response to CalPA Data Request 22.2

- (a) PacifiCorp has entered 102 conditions related to pole decay, reject, restore, replace, damage within the first half of 2022.
- (b) Please refer to the table provided below:

	CORRECTED	OPEN	TOTAL
2022-Q1	13	18	31
CA-NON-TIER	7	6	13
CA-TIER-2	5	12	17
CA-TIER-3	1		1
2022-Q2	8	63	71
CA-NON-TIER	6	17	23
CA-TIER-2	2	46	48
Grand Total	21	81	102

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

September 6, 2022

CalAdvocates-PacifiCorp-2022WMP-22 – 22.2

- (c) Please refer to the Company's response to subpart (b) above, specifically the "CORRECTED" column in the provided table.
- (d) Please refer to the Company's response to subpart (b) above.
- (e) Please refer to the Company's response to subpart (b) above.
- (f) Please refer to the Company's response to subpart (b) above.

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.

CalPA Data Request 22.3

The following questions pertain to PacifiCorp’s WMP Quarterly Initiative Update for the 2nd quarter (Q2) of 2022, filed with Energy Safety on August 22, 2022 (Excel spreadsheet named “PC_2022_Q2QIU_R0.XLSX”).

PacifiCorp reports, in cell S13, a total expenditure of \$14,279 for circuit breaker maintenance, repair, and replacement work as of Q2. PacifiCorp forecasted an expenditure of \$197,179 by the end of Q2.¹

- (a) Please explain why PacifiCorp has failed to achieve its Q2 cost target for this circuit breaker maintenance, repair, and replacement initiative. Identify each factor that contributed to PacifiCorp’s missed cost target for this initiative in the first half of 2022.
- (b) Does PacifiCorp expect to be on track with its Q3 cost forecast for circuit breaker maintenance, repair, and replacement by the end of Q3?
- (c) If the answer to subpart (b) is “yes,” describe PacifiCorp’s plan to meet its cost forecast for Q3.
- (d) State the specific date when PacifiCorp expects completion of circuit breaker maintenance, repair, and replacement work to be back on track (consistent with the targets set in PacifiCorp’s 2022 WMP Update Revision).
- (e) How did PacifiCorp arrive at the cost estimate of \$402,000 by the end of Q4²?
- (f) How did PacifiCorp arrive at the cost estimate of \$197,179 by the end of Q2³?

Response to CalPA Data Request 22.3

- (a) The financial target for the circuit breaker maintenance, repair, and replacement initiative is based on historical spending for breaker work in California and not inclusive of specific targeted units unless there is a known future item that has been identified at the time the capital plan is created. This year, PacifiCorp has not experienced circuit breaker (CB) maintenance activity at a level that is keeping pace with the historical trend.
- (b) Due to the explanation provided in the Company’s response to subpart (a) above on how PacifiCorp estimates the target along with the maintenance activity experienced

¹ PacifiCorp’s Excel Spreadsheet, PC_2022_Q2QIU_R0.XLSX, Tab labelled Initiatives, Cell O13.

² PacifiCorp’s Excel Spreadsheet, PC_2022_Q2QIU_R0.XLSX, Tab labelled Initiatives, Cell M13.

³ PacifiCorp’s Excel Spreadsheet, PC_2022_Q2QIU_R0.XLSX, Tab labelled Initiatives, Cell O13.

so far this year, the Company will only know if the initiative will be on track by the end of Q3 2022.

- (c) Not applicable.
- (d) PacifiCorp expects to meet the annual target for this initiative on December 31, 2022.
- (e) PacifiCorp used historical spending in California to estimate the Q4 2022 target.
- (f) PacifiCorp used historical spending in California to estimate the Q2 2022 target.

CalPA Data Request 22.4

The following questions pertain to PacifiCorp’s WMP Quarterly Initiative Update for the 2nd quarter (Q2) of 2022, filed with Energy Safety on August 22, 2022 (Excel spreadsheet named “PC_2022_Q2QIU_R0.XLSX”).

- (a) Please provide the number of circuit breakers that have been maintained, repaired, or replaced in the first half of 2022.
- (b) Please disaggregate the figure in subpart (a) by HFTD tier, as defined above in definitions O through S.

Response to CalPA Data Request 22.4

- (a) PacifiCorp currently tracks and reports only a financial target for the circuit breaker (CB) maintenance, repair, and replacement initiative. The Q1 2022-Q2 2022 expenditure for CB maintenance and repair is associated with work on 19 CBs. The Q1 2022-Q2 2022 expenditure for CB replacements is associated with work on two CBs.
- (b) As mentioned in PacifiCorp’s 2022 Wildfire Mitigation Plan (WMP) Update, the CB maintenance, repair, and replacement initiative is included as part of the maintenance programs as defined on Sections 7.3.4.15; please refer to item 3 of aforementioned section for more information on prioritization. Disaggregated figures are provided below:

CB maintenance and repair:

- Tier 2: 3 (three) circuit breakers
- Non-High-Fire Threat District (HFTD): 16 CBs

CB replacements:

- Non-HFTD: two CBs

CalPA Data Request 22.5

The following questions pertain to PacifiCorp’s WMP Quarterly Initiative Update for the 2nd quarter (Q2) of 2022, filed with Energy Safety on August 22, 2022 (Excel spreadsheet named “PC_2022_Q2QIU_R0.XLSX”).

PacifiCorp reports, in cell S15, a total expenditure of \$224,847 for crossarm maintenance, repair, and replacement work as of Q2. PacifiCorp forecasted an expenditure of \$136,000 by the end of Q2.¹

- (a) Please explain why PacifiCorp has failed to achieve its Q2 cost target for this crossarm maintenance, repair, and replacement initiative. Identify each factor that contributed to PacifiCorp’s missed cost target for this initiative in the first half of 2022.
- (b) Does PacifiCorp expect to be on track with its Q3 cost forecast for crossarm maintenance, repair, and replacement by the end of Q3?
- (c) If the answer to subpart (b) is “yes”, describe PacifiCorp’s plan to meet its cost forecast.
- (d) State the specific date when PacifiCorp expects completion of its crossarm maintenance, repair, and replacement work to be back on track (consistent with the targets set in PacifiCorp’s 2022 WMP Update Revision).
- (e) How did PacifiCorp arrive at the cost estimate of \$272,000 by the end of Q4²?
- (f) How did PacifiCorp arrive at the cost estimate of \$136,000 by the end of Q2³?

Response to CalPA Data Request 22.5

- (a) As shown in cells S15 and O15 of file “PC_2022_Q2QIU_R0.XLSX”, PacifiCorp’s expenditure crossarm maintenance, repair, and replacement spend in Q1 2022-Q2 2022 exceeded the projected Q1 2022-Q2 2022 progress cost target. Cost targets are built utilizing historical activity of crossarm replacement. Often times, the need to maintain or replace a crossarm is the direct result of sudden, unexpected or emergent circumstances (weather related, car hits pole, tree through line, etc.) and therefore this category of work is subject to higher or lower than planned activity.

¹ PacifiCorp’s Excel Spreadsheet, PC_2022_Q2QIU_R0.XLSX, Tab labelled Initiatives, Cell O15.

² PacifiCorp’s Excel Spreadsheet, PC_2022_Q2QIU_R0.XLSX, Tab labelled Initiatives, Cell M15.

³ PacifiCorp’s Excel Spreadsheet, PC_2022_Q2QIU_R0.XLSX, Tab labelled Initiatives, Cell O15.

2022 WMPs/ PacifiCorp
 September 6, 2022
 CalAdvocates-PacifiCorp-2022WMP-22 – 22.5

	E	L	M	N	O	P	Q	R	S
1	WMPInitiativeActivity	QuantTarget Units	AnnualQuant Target	ProjectedQuantPro gressQ1	ProjectedQuantPro gressQ1-2	ProjectedQuantPro gressQ1-3	ProjectedQuantPro gressQ1-4	QuantActualProg ressQ1	QuantActualProg ressQ1-2
15	Crossarm maintenance, repair, and replace	Financial Reporting-\$	\$272,000	\$68,000	\$136,000	\$204,000	\$272,000	\$100,669	\$224,847

- (b) Not applicable.
- (c) Not applicable.
- (d) Not applicable.
- (e) Cost targets are built utilizing historical activity of crossarm replacement. Often times, the need to maintain or replace a crossarm is the direct result of sudden, unexpected or emergent circumstances (weather related, car hits pole, tree through line, etc.) and therefore this category of work is subject to higher or lower than planned activity.
- (f) Please refer to the Company’s response to subpart (e) above.

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.

CalPA Data Request 22.6

The following questions pertain to PacifiCorp’s WMP Quarterly Initiative Update for the 2nd quarter (Q2) of 2022, filed with Energy Safety on August 22, 2022 (Excel spreadsheet named “PC_2022_Q2QIU_R0.XLSX”).

- (a) Please provide the number of crossarms that have been maintained, repaired, or replaced in the first half of 2022.
- (b) Please disaggregate the figure in subpart (a) by HFTD tier, as defined above in definitions O through S.

Response to CalPA Data Request 22.6

- (a) PacifiCorp currently tracks and reports only a financial target for the maintenance, repair or replacement of crossarms initiative. The volume of crossarms represented by the financial number provided for Q1 2022-Q2 2022 is 38. Note: this figure does not include crossarms replaced during pole replacements, highway relocations, capital reliability projects, or any other crossarm replaced directly on a capital project.
- (b) As mentioned in the Company’s response to subpart (a) above, the target for the maintenance, repair or replacement of crossarms initiative that PacifiCorp uses in the quarterly initiative update is financial information. In addition, PacifiCorp does not require the high-fire threat district (HFTD) tier information from the field of the crossarm work and therefore it is not available for disaggregation.

CalPA Data Request 22.7

The following questions pertain to PacifiCorp’s WMP Quarterly Initiative Update for the 2nd quarter (Q2) of 2022, filed with Energy Safety on August 22, 2022 (Excel spreadsheet named “PC_2022_Q2QIU_R0.XLSX”).

PacifiCorp reports, in cell S36, a total expenditure of \$4,636,947 for vegetation cycle clearing, pruning, and corrective work as of Q2. PacifiCorp forecasted an expenditure of \$3,000,000 by the end of Q2.¹

- (a) Please explain why PacifiCorp has failed to meet its Q2 cost target for this vegetation cycle clearing, pruning, and corrective work initiative. Identify each factor that contributed to PacifiCorp’s missed cost target for this initiative in the first half of 2022.
- (b) Does PacifiCorp expect to be on track with its Q3 cost forecast for vegetation cycle clearing, pruning, and corrective work by the end of Q3?
- (c) If the answer to subpart (b) is “yes,” describe PacifiCorp’s plan to meet its cost forecast.
- (d) State the specific date when PacifiCorp expects completion of vegetation cycle clearing, pruning, and corrective work to be back on track (consistent with the targets set in PacifiCorp’s 2022 WMP Update Revision).
- (e) How did PacifiCorp arrive at the cost estimate of \$5,171,000 by the end of Q4²?
- (f) How did PacifiCorp arrive at the cost estimate of \$3,000,000 by the end of Q2³?

Response to CalPA Data Request 22.7

- (a) PacifiCorp exceeded the Q2 2022 cost target due to the tree work being completed faster than originally anticipated for the majority of the quarter.
- (b) No, the Company is already ahead of the forecast.
- (c) Not applicable.
- (d) December 31, 2022.
- (e) PacifiCorp utilized past actuals to inform the forecast. The forecast is based on actual

¹ PacifiCorp’s Excel Spreadsheet, PC_2022_Q2QIU_R0.XLSX, Tab labelled Initiatives, Cell O36.

² PacifiCorp’s Excel Spreadsheet, PC_2022_Q2QIU_R0.XLSX, Tab labelled Initiatives, Cell M36.

³ PacifiCorp’s Excel Spreadsheet, PC_2022_Q2QIU_R0.XLSX, Tab labelled Initiatives, Cell O36.

2022 WMPs/ PacifiCorp
September 6, 2022
CalAdvocates-PacifiCorp-2022WMP-22 – 22.7

cost per mile by work specification.

(f) PacifiCorp front-loaded the spend distribution based on risk prioritization.

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.

CalPA Data Request 22.8

The following questions pertain to PacifiCorp’s WMP Quarterly Initiative Update for the 2nd quarter (Q2) of 2022, filed with Energy Safety on August 22, 2022 (Excel spreadsheet named “PC_2022_Q2QIU_R0.XLSX”).

PacifiCorp reports, in cell S35, a total of 562 line-miles of vegetation QA/QC work as of Q2. PacifiCorp forecasted a total of 1,169 line-miles by the end of Q2.¹

- (a) Please explain why PacifiCorp has failed to meet its Q2 target for this vegetation QA/QC work initiative. Identify each factor that contributed to PacifiCorp’s missed target for this initiative in the first half of 2022.
- (b) Does PacifiCorp plan to conduct the remaining 562 line-miles of vegetation QA/QC work in Q3 of 2022?
- (c) If the answer to subpart (b) is “yes,” describe PacifiCorp’s plan to finish the remaining 562 line-miles of vegetation QA/QC work.
- (d) If the answer to subpart (b) is “no,” explain why not.
- (e) Does PacifiCorp expect to be on track with its Q3 cost forecast for vegetation QA/QC work by the end of Q3?
- (f) If the answer to subpart (e) is “yes,” describe PacifiCorp’s plan to meet its cost forecast.
- (g) State the specific date when PacifiCorp expects completion of vegetation QA/QC work to be back on track (consistent with the targets set in PacifiCorp’s 2022 WMP Update Revision).
- (h) How did PacifiCorp arrive at the forecast of 1,169 line-miles by the end of Q4²?
- (i) How did PacifiCorp arrive at the forecast of 1,169 line-miles by the end of Q2³?

Response to CalPA Data Request 22.8

- (a) PacifiCorp overestimated its capacity to complete post audits as the tree work was completed. Competing factors such as customer interaction, contractor oversight, increased dieback (slowing down post audits and tree work in Q2 2022) decreased

¹ PacifiCorp’s Excel Spreadsheet, PC_2022_Q2QIU_R0.XLSX, Tab labelled Initiatives, Cell O35.

² PacifiCorp’s Excel Spreadsheet, PC_2022_Q2QIU_R0.XLSX, Tab labelled Initiatives, Cell M35.

³ PacifiCorp’s Excel Spreadsheet, PC_2022_Q2QIU_R0.XLSX, Tab labelled Initiatives, Cell O35.

- capacity of internal staff to conduct post audit activities. Wildfire response efforts have also impacted tree work and post audit actions recently. In addition, the Company filled quality assurance (QA) / quality control (QC) positions to increase post-audit capacity later in the year than anticipated.
- (b) Yes.
 - (c) Currently, all tree work associated with this initiative is complete and available for post-audit. Adjusted forecast is to complete post-audit of remaining line miles by end of Q3 2022. As stated in the Company's response to subpart (a) above, PacifiCorp has hired additional staff to support post-audit activities and increase capacity to conduct post audits by internal staff. PacifiCorp plans to redirect resources to focus on remaining line miles as part of this initiative. A utility forester and two newly hired associate utility forester positions (referenced in the Company's response to subpart (a) above), will be focused on conducting post-audits. If needed, PacifiCorp will also utilize third party contractor resources to ensure post-audit activities associated with this initiative are completed.
 - (d) Not applicable.
 - (e) PacifiCorp has not forecasted costs by quarter associated with the QA/QC program, however, PacifiCorp will be on track with respect to miles post-audited by end of Q3 2022, as stated in the Company's response to subpart (c) above.
 - (f) Please refer to the Company's response to subpart (c) above.
 - (g) The remaining miles are anticipated to be post-audited by end of Q3 2022.
 - (h) PacifiCorp anticipated that post-audits would be completed prior to Q4 2022 based on previous actuals and increase in QA/QC staff.
 - (i) PacifiCorp anticipated the additional QA/QC positions would have been filled earlier in the year to facilitate an increase in post-audit capacity, however the hiring process to find qualified candidates took longer than anticipated. PacifiCorp target tree work to be completed in Q2 2022 and therefore targeted the post-audit to be completed in Q2 2022 as well, which was an aggressive forecast based on an anticipated increase in post-audit capacity through hiring additional staff.

CalPA Data Request 22.9

The following questions pertain to PacifiCorp’s WMP Quarterly Initiative Update for the 2nd quarter (Q2) of 2022, filed with Energy Safety on August 22, 2022 (Excel spreadsheet named “PC_2022_Q2QIU_R0.XLSX”).

Regarding PacifiCorp’s 2022 vegetation QA/QC initiative referenced in question (8):

- (a) How many vegetation QA/QC audits were conducted in the first half of 2022?
- (b) Please disaggregate the figure in subpart (a) by HFTD tier, as defined above in definitions O through S.
- (c) Were HFTD areas prioritized over other areas for vegetation QA/QC audits in the first half of 2022?
- (d) How many vegetation QA/QC audits in the first half of 2022 found that a corrective action was needed?
- (e) How many supplemental tree trimming jobs occurred in the first half of 2022 as a result of a vegetation QA/QC audit?
- (f) How many supplemental tree removal jobs occurred in the first half of 2022 as a result of a vegetation QA/QC audit?

Response to CalPA Data Request 22.9

The Company assumes that the reference to “question (8)” is intended to be a reference to CalPa Data Request 22.8. Based on the foregoing assumption, the Company responds as follows:

- (a) A distribution circuit or transmission line may be audited over the course of several weeks or months, consisting of several post-audit field visits as the tree work is completed. At the end of Q2 2022, PacifiCorp had completed post-audit activities associated with 17 lines (distribution and transmission lines) and six lines were in process of being audited.
- (b) Of the 17 lines where post-audits were completed (i.e., all line miles post audited), all 17 lines are categorized as Tier 2 lines by PacifiCorp. Of the six lines where post-audits were still underway, one line is categorized as Tier 3, and the remaining five lines categorized as Tier 2.

2022 WMPs/ PacifiCorp

September 6, 2022

CalAdvocates-PacifiCorp-2022WMP-22 – 22.9

- (c) Yes, areas in the high-fire threat district (HFTD) were prioritized in the first half of 2022 for vegetation quality assurance (QA) / quality control (QC) audits.
- (d) Of the post-audits conducted or underway, corrective actions were identified on 16 lines.
- (e) 292 prunes.
- (f) 604 removals.

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.