

CalPA Data Request 23.1

This question pertains to PacifiCorp’s WMP Quarterly Initiative Update (QIU) for the 1st quarter of 2022, filed with Energy Safety on April 15, 2022 (Excel spreadsheet named “2022-04-15_PC_2022_Q1-QIU_R0.XLSX”) (hereinafter Q1 2022 QIU).

In the “Initiatives” tab of the Q1 2022 QIU, PacifiCorp reports the progress of 12 out of 35 initiatives with financial values instead of units of work completed (e.g., # of line miles inspected or # of QA/QC audits).¹

Please provide a revised 1st quarter initiative update that contains non-financial units for initiative targets, quarterly projections, and actual work completed for each of the following:²

- (a) Quality assurance / quality control of inspections;
- (b) Centralized repository for data;
- (c) Circuit breaker maintenance and installation to de-energize lines upon detecting a fault;
- (d) Crossarm maintenance, repair, and replacement;
- (e) Mitigation of impact on customers and other residents affected during PSPS event;
- (f) A summarized risk map that shows the overall ignition probability and estimated wildfire consequence along the electric lines and equipment;
- (g) Forecast of a fire risk index, fire potential index, or similar;
- (h) Personnel monitoring areas of electric lines and equipment in elevated fire risk conditions;
- (i) Community engagement;
- (j) LiDAR inspections of vegetation around distribution electric lines and equipment;
- (k) LiDAR inspections of vegetation around transmission electric lines and equipment;
and

¹ PacifiCorp’s Q1 2022 QIU, “Initiative” tab, filtering column L for “Financial Reporting-\$\$” values.

² PacifiCorp’s Q1 2022 QIU, “Initiative” tab, columns M through R.

- (l) Vegetation management to achieve clearances around electric lines and equipment.

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The wildfire mitigation plan (WMP) guidelines do not require non-financial units for initiative targets, quarterly projections and actual work completed, and for many of the initiatives non-financial units are not formally tracked in a record system.

- (a) The PacifiCorp quality assurance (QA) / quality control (QC) of inspections program is not planned on a quarterly timeline. At the beginning of the year, field inspection support (FIS) identifies the work to be performed in each district. From that point, PacifiCorp FIS knows how many facility points will be inspected within the year, as well as how many facility points the inspection contractor and FIS team needs to complete to meet the requirements set for the inspections. To support the completion of annual targets, there is a bi-weekly call held to monitor status and progression of the inspections and the QA/QC.
- (b) At PacifiCorp, the spend associated with the centralized repository for data initiative is for the resources to start development of the centralized share point site for all filings, to support consistent and clarity of the data provided for field audits and desktop verifications. The resource's tasks are largely responsive to filings and data requests, therefore there are no units of work completed for the centralized repository for data initiative.
- (c) PacifiCorp's narrative for the circuit breaker maintenance and installation to de-energize lines upon detecting a fault initiative describes the standard maintenance of circuit breakers performed, similarly to San Diego Gas and Electric (SDG&E), Southern California Edison (SCE) and Pacific Gas and Electric (PG&E) narratives, as part of other inspection programs. The work for this program is completed as part of other initiatives and not separately tracked.
- (d) Similar to other utilities such as SDG&E, SCE, PG&E, Bear Valley Electric Service, Inc. (BVES), Liberty Utilities, PacifiCorp does not track units for this type of work. Crossarm replacement is completed: immediately for A-imminent threats, within 30 days for priority As, as the need is identified through maintenance. Until the maintenance work is completed, it is unknown the exact number of crossarms needing to be replaced.
- (e) The mitigation of impact on customers and other residents affected during public safety power shutoff (PSPS) event initiative has two different programs: (1) the alternative power rebate program, and (2) the free portable battery program.
 - (1) For the rebate program, it is not possible to predict the number of customers in a given quarter who will request a rebate. The spend associated with this program is

for the software maintenance of the program, where the payment is upfront for the program to run throughout the year. There are no planned units of work completed.

(2) For the free portable battery program, PacifiCorp planned the following:

	Q1 Plan	Q1 Actuals	Q2 Plan	Q2 Actuals
Batteries Delivered	0	0	31	31
Customers Reached	0	0	50	48

- (f) In section 7.3.1.1 of PacifiCorp’s 2022 WMP Update, the Company has materially delivered phase 1 of Localized Risk Assessment Model (LRAM) and performs updates, as new and improved data elements are made available, PacifiCorp evaluates the elements for consideration to updates in the risk model. These updates cannot be tracked in units of work completed and, similarly, other utilities such as SCE’s and PG&E’s quarterly initiative updates do not report on planned units of work for the summarized risk map that shows the overall ignition probability and estimated wildfire consequence along the electric lines and equipment initiative.
- (g) At PacifiCorp, the initiative is to procure all the components needed to implement the full suite of Technosylva’s Wildfire Risk Analysis Enterprise by the year-end 2022. Progress for the forecast of a fire risk index, fire potential index, or similar initiative is not currently tracked or planned on a quarterly cycle.
- (h) In Section 7.3.2.5 of PacifiCorp’s 2022 WMP, “PacifiCorp trains and deploys personnel when there is elevated fire risk, activating “watches” or “activations” depending on how much fire climatology indicates elevated fire risk. These personnel go on readiness patrols and may modify system protection settings and monitor the network during the elevated fire risk period”. This work is largely reactive and not planned, thus there are no planned units of work to report for the personnel monitoring areas of electric lines and equipment in elevated fire risk conditions initiative.
- (i) The community engagement initiative describes communication outreach, there are no planned units of work to report for this initiative.
- (j) The Light Detection And Ranging (LiDAR) inspections of vegetation around distribution electric lines and equipment initiative is now referred to as “Remote Sensing Inspections – Distribution”, for the 685 line miles planned in the year, as is reflected in Table 12 of file “2022-05-02_PC_2022_Q1-QDR_R1”. As all of the spend was planned for Q3 2022, all of these line miles were planned for Q3 2022.

- (k) The LiDAR inspections of vegetation around transmission electric lines and equipment initiative is now referred to as “Remote Sensing Inspections – Transmission” for the 341 line miles planned in the year, as is reflected in Table 12 of file “2022-05-02_PC_2022_Q1-QDR_R1”. As all of the spend was planned for the Q3 2022, all of these line miles were planned for Q3 2022.

- (l) PacifiCorp plans to complete 1,169 line miles for the vegetation management to achieve clearances around electric lines and equipment initiative within the year. At this time, this work is not planned quarterly, therefore in the quarterly initiative update, the quarterly planned numbers were not included. PacifiCorp will review this program to provide quarterly planned units of work for the 2023 WMP quarterly initiative update.

CalPA Data Request 23.2

Questions 2 to 4 pertain to PacifiCorp’s WMP Quarterly Initiative Update for the 2nd quarter of 2022, filed with Energy Safety on August 22, 2022 (Excel spreadsheet named “PC_2022_Q2QIU_R0.xlsx”) (hereinafter Q2 2022 QIU).

In the “Initiatives” tab of the Q2 2022 QIU, PacifiCorp reports the progress of 12 out of 35 initiatives with financial values instead of units of work completed (e.g., # of line miles inspected or # of QA/QC audits).⁵

Please provide a revised 2nd quarter initiative update that contains non-financial units for initiative targets, quarterly projections, and actual work completed for each of the following:⁶

- (a) Quality assurance / quality control of inspections;
- (b) Centralized repository for data;
- (c) Circuit breaker maintenance and installation to de-energize lines upon detecting a fault;
- (d) Crossarm maintenance, repair, and replacement;
- (e) Mitigation of impact on customers and other residents affected during PSPS event;
- (f) A summarized risk map that shows the overall ignition probability and estimated wildfire consequence along the electric lines and equipment;
- (g) Forecast of a fire risk index, fire potential index, or similar;
- (h) Personnel monitoring areas of electric lines and equipment in elevated fire risk conditions;
- (i) Community engagement;
- (j) LiDAR inspections of vegetation around distribution electric lines and equipment;
- (k) LiDAR inspections of vegetation around transmission electric lines and equipment;
and
- (l) Vegetation management to achieve clearances around electric lines and equipment.

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Response to CalPA Data Request 23.2

Please refer to the Company's response to CalPA Data Request 23.1.

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 23.3

Questions 2 to 4 pertain to PacifiCorp’s WMP Quarterly Initiative Update for the 2nd quarter of 2022, filed with Energy Safety on August 22, 2022 (Excel spreadsheet named “PC_2022_Q2QIU_R0.xlsx”) (hereinafter Q2 2022 QIU).

In the “Initiatives” tab of the Q2 2022 QIU, PacifiCorp reports that 11 of 35 WMP initiatives fail to meet Q2 targets.^{7,8} According to the QIU template instructions, these initiatives should be reported as “Delayed,” and must include any corrective actions needed to get back on track.⁹

Please revise your 2nd quarter initiative update with the appropriate initiative status for the following initiatives:¹⁰

- (a) Intrusive pole inspections;
- (b) Centralized repository for data;
- (c) Circuit breaker maintenance and installation to de-energize lines upon detecting a fault;
- (d) Covered conductor installation;
- (e) Crossarm maintenance, repair, and replacement;
- (f) Mitigation of impact on customers and other residents affected during PSPS event;
- (g) A summarized risk map that shows the overall ignition probability and estimated wildfire consequence along the electric lines and equipment;
- (h) Forecast of a fire risk index, fire potential index, or similar;
- (i) Community engagement;
- (j) Quality assurance / quality control of vegetation inspections; and
- (k) Vegetation management to achieve clearances around electric lines and equipment.

Response to CalPA Data Request 23.3

Please refer to Attachment CalPA 23.3, file “2022-08-22_PC_2022_Q2-QIU_R0_CAL Advocates Data Request_20220912” which provides the Company’s responses to subparts (a) through (d), (g), (h) and (j).

- (a) The intrusive pole inspections initiative is 61 percent behind plan. PacifiCorp processes are to plan the number of inspections by year and then the breakout by quarter is an estimate based on historical numbers. There was not enough activity in the first half of the year to meet the Q1 2022-Q2 2022 target, however, the number of inspections performed in Q3 2022 is increasing, and PacifiCorp expects to meet the annual target.
- (b) The centralized repository for data initiative is 75 percent behind plan. The planned spending was comprised of resource time, however, activities associated with this initiative were paused after personnel allocated to perform work left the Company causing underspend. Although PacifiCorp has been trying to hire new resources as a corrective action, the Company currently projects an underspend for this category in 2022.
- (c) The circuit breaker maintenance and installation to de-energize lines upon detecting a fault initiative is 93 percent behind plan. 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 maintenance activity at a level that is keeping pace with the historical trend. PacifiCorp plans to report underspend in this category.
- (d) The covered conductor installation initiative is 17 percent behind plan. PacifiCorp covered conductor projects in California have been impacted by material shortages, damages and evacuations due to recent fires, delays in permitting, as well as construction firms are facing resources constraints. PacifiCorp is currently assessing the impact on project schedules and evaluating alternatives to bring the project back on track.
- (e) The crossarm maintenance, repair, and replacement initiative is 65 percent ahead of plan, not behind plan.
- (f) The mitigation of impact on customers and other residents affected during public safety power shutoff (PSPS) events initiative is 112 percent ahead of plan, not behind plan.
- (g) The summarized risk map that shows the overall ignition probability and estimated wildfire consequence along the electric lines and equipment initiative is 38 percent behind plan. The planned spending was comprised of resource time, however, activities associated with this initiative were paused after personnel allocated to perform work left the Company causing underspend. Although PacifiCorp has been trying to hire new resources as a corrective action, the Company currently projects an underspend for this category in 2022.

- (h) The forecast of a fire risk index, fire potential index, or similar initiative is 27 percent behind plan. Due to unexpected delays with procurement processes the spending per quarter shifted, however PacifiCorp expects to meet the annual target.
- (i) The community engagement initiative is 176 percent ahead of plan, not behind plan.
- (j) The quality assurance (QA) / quality control (QC) of vegetation inspections initiative is 52 percent behind plan. PacifiCorp fell short of the target of completing post audits by end of Q2 2022 as the Company overestimated how quickly the tree work would proceed and encountered factors that slowed the post audits such as increased dieback identified during audits, which in turn slowed the tree work efforts in Q2 2022 (i.e., all line miles were not available to be post audited by end of Q2 2022). In addition, PacifiCorp hired additional post-audit staff later in the year than anticipated as the hiring process was prolonged. These factors as well as other day-to-day job functions competed with the vegetation management's ability to conduct post audits within the timeframe originally anticipated. With respect to corrective actions to complete the post-audit of the remaining miles, in August 2022, PacifiCorp has hired additional post-audit staff that will be assisting existing staff. In total, six internal staff will participate in conducting post-audits and will be augmented by contractors if needed in order to complete the remaining miles to be post-audited by the end of Q3 2022.
- (k) The vegetation management to achieve clearances around electric lines and equipment initiative is 55 percent ahead of plan, not behind plan.

CalPA Data Request 23.4

Questions 2 to 4 pertain to PacifiCorp’s WMP Quarterly Initiative Update for the 2nd quarter of 2022, filed with Energy Safety on August 22, 2022 (Excel spreadsheet named “PC_2022_Q2QIU_R0.xlsx”) (hereinafter Q2 2022 QIU).

In the “Initiatives” tab of the Q2 2022 QIU, PacifiCorp reports that 11 of 35 WMP initiatives fail to meet Q2 targets.¹¹ For each of the following initiatives, please describe any corrective actions that PacifiCorp has taken or plans to take to ensure that the initiative meets targets in the 3rd and 4th quarters of 2022:

- (a) Intrusive pole inspections;
- (b) Centralized repository for data;
- (c) Circuit breaker maintenance and installation to de-energize lines upon detecting a fault;
- (d) Covered conductor installation;
- (e) Crossarm maintenance, repair, and replacement;
- (f) Mitigation of impact on customers and other residents affected during PSPS event;
- (g) A summarized risk map that shows the overall ignition probability and estimated wildfire consequence along the electric lines and equipment;
- (h) Forecast of a fire risk index, fire potential index, or similar;
- (i) Community engagement;
- (j) Quality assurance / quality control of vegetation inspections; and
- (k) Vegetation management to achieve clearances around electric lines and equipment

Response to CalPA Data Request 23.4

Please refer to the Company’s response to CalPA Data Request 23.3.

