

OEIS Data Request 10.1

Regarding lessons learned from past wildfires:

- (a) In Appendix D of its WMP, in response to a 2022 area for continued improvement regarding lessons learned from past wildfires (identified by Energy Safety in its Decision on PacifiCorp's 2022 WMP Update), PacifiCorp states that it is planning to implement fire incident tracking in Q2 2024. PacifiCorp further explains that after the implementation of fire incident tracking, it expects to design and integrate new processes to perform trend and root cause analysis for ignitions by the end of 2024.
- i. Is the fire incident tracking database the method PacifiCorp plans to use to investigate the cause(s) of PacifiCorp-ignited catastrophic wildfires and to identify associated lessons learned?
- (1) If not, does PacifiCorp currently use or plan to use any other methods for investigating the cause(s) of PacifiCorp-ignited catastrophic wildfires and identifying associated lessons learned?
- a) If so, please describe these other methods, including a timeline for implementation.
- (b) In Section 10 of its WMP, PacifiCorp does not provide a narrative detailing lessons learned from PacifiCorp-ignited catastrophic wildfires (as listed in Section 5.3.2). In addition, PacifiCorp does not detail specific mitigation measures implemented as a result of these lessons learned nor demonstrate how the mitigation measures are being integrated into PacifiCorp's wildfire mitigation strategy.
- i. Please confirm if this information was left out given PacifiCorp's response to PC-22-06 (as described above and in Appendix D) and given that PacifiCorp has not yet implemented fire incident tracking or integrated processes to perform trend and root cause analysis for ignitions.
- (1) If this is incorrect, please explain why this information was left out of Section 10 of PacifiCorp's WMP.

Response to OEIS Data Request 10.1

- (a) PacifiCorp objects to the extent the request calls for information protected by the attorney-client privilege and the attorney work-product doctrine, including without limitation in respect to ongoing cause and origin investigations being conducted by PacifiCorp's legal counsel in conjunction with pending litigation. Subject to these objections, PacifiCorp responds as follows: PacifiCorp denies that there are any "PacifiCorp-ignited catastrophic wildfires." If there is an allegation made that

PacifiCorp ignited a catastrophic fire, PacifiCorp’s legal counsel initiates and conduct a full and thorough cause and origin investigation with the assistance of external consulting experts.

- (b) PacifiCorp objects to the extent the request calls for information protected by the attorney-client privilege and the attorney work-product doctrine. Subject to these objections, PacifiCorp responds as follows: As stated in Section 5.3.2, Table 5-4 “Catastrophic Wildfires with Pacific Power’s Service Territory in California” identifies catastrophic fire incidents reported under certain regulatory requirements. PacifiCorp denies that listing an incident in this table means that there are any “PacifiCorp-ignited catastrophic wildfires.” The two incidents listed in Table-5-4 are the subject of pending litigation, and PacifiCorp’s legal counsel is conducting an ongoing cause and origin investigation with respect to each incident.