

2023WMP-10 / PacifiCorp
June 15, 2023
CalAdvocates Data Request 10.1

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PacifiCorp's Quarterly Data Report for the 1st quarter of 2023, filed with Energy Safety on May 6, 2023 (Excel spreadsheet named "PC_2023_Q1_Tables1-15_R0.xlsx") (hereinafter Q1 2023 QDR).

According to "Table 5," PacifiCorp reports a total of 52 unplanned distribution outages in Q1 2023 due to contact with vegetation.⁴ This total of 52 represents approximately 40 percent of the total unplanned outages from 2022, surpassing the quarterly average of 33 outages from the same year. Please provide an explanation for the observed rise in vegetation-related outages during the first quarter of 2023.

Response to CalAdvocates Data Request 10.1

Of the 52 unplanned distribution outages in Q1 2023 due to contact vegetation, only two were preventable. 25 of the outages occurred during a major weather event in Q1 2023 and only one of the 25 were preventable.

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.

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PacifiCorp's Quarterly Data Report for the 1st quarter of 2023, filed with Energy Safety on May 6, 2023 (Excel spreadsheet named "PC_2023_Q1_Tables1-15_R0.xlsx") (hereinafter Q1 2023 QDR).

According to "Table 6," PacifiCorp reports in Q1 2023, a total of 2 ignitions, due to contact with vegetation, which amounts to roughly 66 percent of all distribution ignitions in 2022. Please provide an explanation for why there was an increase in vegetation-related ignitions in the first quarter of 2023 compared to 2022.

Response to CalAdvocates Data Request 10.2

Due to a major weather event that occurred in Q1 2023, there was an increase in vegetation related incidents.

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CalAdvocates Data Request 10.3

This question pertains to PacifiCorp’s 2023 WMP, Table 8-17, p. 185. PacifiCorp states, “At the time of this filing, Pacific Power is unable to provide Vegetation Management and Inspection Performance Metrics.” Yet, PacifiCorp provides this same information in its Q1 2023 QDR.

- (a) Please provide an explanation why PacifiCorp is able to report this information in its QDR but not in the 2023 WMP, Table 8-17.
- (b) Please provide a revised Table 8-17 with the correct data for vegetation management and inspection performance metrics.

Response to CalAdvocates Data Request 10.3

- (a) PacifiCorp did not provide these numbers in the 2023 wildfire mitigation plan (WMP) due to miscommunication and a lapse in the data gathering process. PacifiCorp is currently developing a tool to streamline this process by tracking and gathering this information. Efforts are also underway to develop additional quality assurance and quality control processes to ensure data is consistent in all of the Company’s filings by Q3 of 2023.
- (b) Please refer to the table provided below:

Performance Metrics	2020	2021	2022	2023 Projected	2024 Projected	2025 Projected	Method of Verification (e.g., third-party evaluation, quarterly data report (QDR))
Vegetation-caused ignitions	5	4	3	5	5	5	Q1 2023 QDR
Vegetation-caused outages	90	140	135	138	138	138	Q1 2023 QDR

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CalAdvocates Data Request 10.4

This question refers to PacifiCorp's response to data request CalAdvocates-PacifiCorp-2023WMP-06, question 5(d) and 5(e). PacifiCorp states, "Out of the 79 distribution and transmission lines audited, 58 lines were found with corrective actions identified."

- (a) In the context of the quote above, how does PacifiCorp define a "line"?
- (b) Does the statement above imply that only 21 lines (26.6%) passed the audit? Please explain your response.

Response to CalAdvocates Data Request 10.4

On June 8, 2023, the California Public Advocates Office (CalAdvocates) advised that the reference to "question 6(d) and 6(e)" should have been references to "question 5(d) and 5(e)". With that clarification, the Company assumes that the reference to "data request CalAdvocates-PacifiCorp-2023WMP-06, question 5(d) and 5(e)" is intended to be a reference to CalAdvocates Data Request 6.5 subparts (d) and (e). Based on the foregoing assumption, the Company responds as follows:

- (a) In the context of the Company's response to CalAdvocates Data Request 6.5, PacifiCorp defines a "line" as the distribution or transmission line that is scheduled for vegetation management by work activity (annual and/or routine), which generally refers to the entire length of the line.
- (b) No. PacifiCorp does not define a pass or fail with respect to post-audits but rather targets to conduct an audit of work completed and corrects any conditions identified.

CalAdvocates Data Request 10.5

This question refers to PacifiCorp’s response to data request CalAdvocates-PacifiCorp-2023WMP-06, question 5(d) and 5(e). PacifiCorp states, “Out of the 79 distribution and transmission lines audited, 58 lines were found with corrective actions identified.” Additionally, PacifiCorp states, “[a]s a result of post-audits, 5,542 corrective actions were identified. Corrective actions include both pruning and removal and include actions requested by PacifiCorp that are not indicative of contractor performance (e.g., a tree that started to decline between work completion and post-audit).”

- (a) How many corrective actions were identified in 2022 in Tier 3 areas as a result of these audits?
- (b) What is PacifiCorp’s target timeframe for completing such corrective actions in Tier 3 areas?
- (c) Have all corrective actions identified in 2022 in Tier 3 areas been completed?
- (d) If the answer to (b) is “no”, please explain why not.
- (e) How many corrective actions were identified in 2022 in Tier 2 areas as a result of these audits?
- (f) What is PacifiCorp’s target timeframe for completing such corrective actions in Tier 2 areas?
- (g) Have all corrective actions identified in 2022 in Tier 2 areas been completed?
- (h) If the answer to (e) is “no”, please explain why not.

Response to CalAdvocates Data Request 10.5

On June 8, 2023, the California Public Advocates Office (CalAdvocates) advised that the reference to “question 6(d) and 6(e)” should have been references to “question 5(d) and 5(e)”. With that clarification, the Company assumes that the reference to “data request CalAdvocates-PacifiCorp-2023WMP-06, question 5(d) and 5(e)” is intended to be a reference to CalAdvocates Data Request 6.5 subparts (d) and (e). Based on the foregoing assumption, the Company responds as follows:

- (a) In 2022, 388 corrective actions were identified in Tier 3 areas.
- (b) In general, PacifiCorp attempts to conduct post-audits while the tree crews are in the vicinity, to facilitate prompt and efficient correction of any identified conditions. Exceptions may be prioritized based on the type of vegetation condition identified,

- such as imminent conditions or an impending weather event. All exceptions are targeted to be addressed within the calendar year.
- (c) Yes
 - (d) Not Applicable.
 - (e) In 2022, 4,509 corrective actions were identified in Tier 2 areas.
 - (f) In general, PacifiCorp attempts to conduct post-audits while the tree crews are in the vicinity, to facilitate prompt and efficient correction of any identified conditions. Exceptions may be prioritized based on the type of vegetation condition identified, such as imminent conditions or impending weather event. All exceptions are targeted to be addressed within the calendar year.
 - (g) Yes.
 - (h) Not Applicable.

CalAdvocates Data Request 10.6

This question refers to PacifiCorp's 2023 WMP, Table 8-19, pp. 205-206.

In 2022, PacifiCorp has reported that it audited 72% of all miles for detailed vegetation inspection for distribution and only 83% of all miles for detailed vegetation inspection for transmission. The 2022 goal for both detailed vegetation inspection programs was 100%.

- (a) Please explain why PacifiCorp was unable to complete audits for the remaining 28% of detailed vegetation inspections for distribution in 2022.
- (b) Please explain why PacifiCorp was unable to conduct audits for the remaining 17% of detailed vegetation inspections for transmission in 2022.
- (c) How did PacifiCorp set its targets of 100% in 2022 for both distribution and transmission?
- (d) Did any adverse consequences arise as a result of PacifiCorp's failure to achieve its 2022 targets in this area? Please explain your response.
- (e) Does PacifiCorp's 2022 performance in this area demonstrate prudent management? Why or why not?

Response to CalAdvocates Data Request 10.6

- (a) The remaining line miles were distribution circuits that were inspected, worked, and post-audited as part of the annual patrol inspection program. The remaining line miles were scheduled for routine maintenance work associated with detailed inspections later in the calendar year. As the work was completed later in the year and scheduled to be inspected again in 2023, coupled with weather events that impacted ability to conduct post audits, PacifiCorp elected to move forward with 2023 program rather than conducting post-audits in 2023 of 2022 work and then shortly thereafter reinspecting the line miles for 2023 work. From a risk management perspective, the line miles were audited as part of the annual patrol inspection program.
- (b) Similar to the Company's response to subpart (a) above, the remaining transmission was completed later in the year, weather impacted ability to conduct ground-based post audits and work/inspection was scheduled again in 2023. PacifiCorp did conduct multiple aerial inspections/flights post-work where vegetation conditions were reviewed by PacifiCorp foresters; however, PacifiCorp did not count these reviews/audits in the total line miles audited.
- (c) As a risk management strategy, PacifiCorp identified a target of 100 percent post-audits.

- (d) The Company is not aware of any adverse consequences.

- (e) Yes, PacifiCorp's 2022 performance in this area demonstrates prudent management. PacifiCorp targets 100 percent post-audit of work conducted based on detailed and annual patrol inspections. Although 100 percent ground-based audit was not achieved in 2022, PacifiCorp did have "eyes on" all lines during the calendar year through a combination of ground-based post-audits and aerial reviews to identify work that may have been missed, not conducted to specification, or work needed per PacifiCorp's discretion. All lines were audited or reviewed as a risk management strategy during the calendar year, however not all types of work were audited (in some cases both annual patrol and detail inspection and correction work was conducted on the same line).