

CalAdvocates Data Request 17.1

The following questions pertain to PacifiCorp's 2023 Revised Wildfire Mitigation Plan submitted on October 11, 2023.

Referring to Section 8.2.5, Table 8-19, of PacifiCorp's 2023 Revised Wildfire Mitigation Plan, PacifiCorp provides updated Vegetation Management QA/QC target pass rates.

Under the "Audit Results of 2022" column, for "Routine Cycle Maintenance (identified during detailed inspections) – Distribution," PacifiCorp reports "72% of all miles audited with a pass rate of 94%."

- (a) Please explain the precise meaning of "72% of all miles audited with a pass rate of 94%." Among other things, define the numerator and denominator of each percentage, and provide the raw numbers for each numerator and each denominator.
- (b) Does the "72% of all miles audited" imply that only a portion of the total miles targeted for 2022 were audited?
- (c) What was your target pass rate for 2022?
- (d) What is the total number of target miles that were supposed to be audited in 2022?
- (e) Does the 94% pass rate apply to the 72% of audited miles or to the total target miles?
- (f) What is your plan for auditing the 28% of miles that were not audited?

Response to CalAdvocates Data Request 17.1

- (a) 72 percent of the line miles completed as part of the routine cycle maintenance were post-audited. Of the line miles post audited, the pass rate was 94%.
 - 72 percent calculation:
(390.26 miles post audited / 545.69 miles of cycle maintenance completed) * 100
 - 94 percent pass rate calculation = 1 – fail rate percent:
1 – (137 non-billable audit exceptions / 2,469 work locations identified during initial inspection)
- (b) In 2022, 72 percent of the targeted routine cycle maintenance line miles to audit were audited.
- (c) Target pass rate for routine cycle maintenance in 2022 was not identified.

- (d) PacifiCorp interprets this question as referring to the miles targeted for routine cycle maintenance, consistent with the preceding questions in subparts (b) and (c). Based on the foregoing interpretation, the Company responds as follows:

Total number of target miles: 545.69.

- (e) The 94 percent pass rate applies to the 72 percent of audited miles.
- (f) The remaining line miles associated with routine cycle maintenance that were not audited are primarily from three distribution circuits. In 2022, PacifiCorp conducted patrol inspection and corrective work on these circuits and also completed post-audit of that work. All audit exceptions were then completed prior to the circuits being reinspected as part of routine cycle maintenance. All high risk conditions were identified and addressed as part of the patrol inspection and correction activity, which was subsequently post-audited. Considering this as well as routine cycle maintenance being completed late in the calendar year for these circuits, post-audit of the routine cycle maintenance activity was not completed in 2022. In addition, weather conditions hindered completion of the routine cycle maintenance post-audit. To address this, PacifiCorp scheduled these circuits for planned work in early 2023 to be reinspected. Any conditions would then be identified during inspection and subsequent post-audit in 2023.

CalAdvocates Data Request 17.2

The following questions pertain to PacifiCorp's 2023 Revised Wildfire Mitigation Plan submitted on October 11, 2023.

Referring to Section 8.2.5, Table 8-19, of PacifiCorp's 2023 Revised Wildfire Mitigation Plan, PacifiCorp provides updated Vegetation Management QA/QC target pass rates.

Under the "Audit Results of 2022" column, for "Pole Clearing (Beyond PRC 4292 requirements)," PacifiCorp reports "17% of all poles audited with a pass rate of 99%."

- (a) Please explain the precise meaning of "17% of all poles audited with a pass rate of 99%." Among other things, define the numerator and denominator of each percentage, and provide the raw numbers for each numerator and each denominator.
- (b) Does the "17% of all poles audited" imply that only a portion of the total poles targeted for 2022 were audited?
- (c) What was your target pass rate for 2022?
- (d) What is the total number of target poles that were supposed to be audited in 2022?
- (e) Does the 99% pass rate apply to the 17% of audited poles or to the total target poles?
- (f) What is your plan for auditing the 83% of poles that were not audited?
- (g) Please explain why the percentage of audited poles was changed from 100% in PacifiCorp's original WMP to 17% in PacifiCorp's revised WMP.

Response to CalAdvocates Data Request 17.2

- (a) 17 percent of the total number of poles worked as part of the pole clearing effort were post-audited. Of the poles audited, the pass rate was 99 percent.
 - 17 percent calculation:
 $(518 \text{ poles audited} / 3,080 \text{ poles worked}) * 100$
 - 99 percent pass rate calculation = 1 – fail rate percent:
 $1 - (5 \text{ non-billable audit exceptions} / 3,080 \text{ poles worked})$
- (b) No. The targeted total poles for 2022 was 10 percent of poles worked. The target was exceeded.

- (c) Target pass rate for pole clearing in 2022 was not identified.
- (d) 308 poles.
- (e) The 99 percent pass rate applies to the 17 percent of audited poles.
- (f) Auditing 100 percent of poles cleared was not the target. PacifiCorp targeted 10 percent of poles for post-audit and exceeded this target.
- (g) PacifiCorp's target for post-audit has always been 10 percent. PacifiCorp misinterpreted the target goal originally by stating 100 percent of the targeted sample size would be post-audited.

CalAdvocates Data Request 17.3

The following questions pertain to PacifiCorp's 2023 Revised Wildfire Mitigation Plan submitted on October 11, 2023.

Referring to Section 8.2.5, Table 8-19, of PacifiCorp's 2023 Revised Wildfire Mitigation Plan, PacifiCorp provides updated Vegetation Management QA/QC target pass rates.

Under the "Audit Results of 2022" column, for "Routine Maintenance (identified during detailed inspections) - Transmission," PacifiCorp reports "83% of all miles audited with a pass rate of 99%."

- (a) Please explain the precise meaning of "83% of all poles audited with a pass rate of 99%." Among other things, define the numerator and denominator of each percentage, and provide the raw numbers for each numerator and each denominator.
- (b) Does the "83% of all miles audited" imply that only a portion of the total miles targeted for 2022 were audited?
- (c) What was your target pass rate for 2022?
- (d) What is the total number of target miles that were supposed to be audited in 2022.
- (e) Does the 99% pass rate apply to the 83% of audited miles or to the total target miles?
- (f) What is your plan for auditing the 17% of miles that were not audited?

Response to CalAdvocates Data Request 17.3

- (a) 83 percent of the line miles completed as part of the routine maintenance were post-audited. Of the line miles post audited, the pass rate was 99 percent.
 - 83 percent calculation:
(254.65 miles post audited / 307.2 miles of routine maintenance completed) * 100
 - 99 percent pass rate calculation = 1 – fail rate percent:
1 – (3 non-billable audit exceptions / 547 work locations identified during initial inspection)
- (b) In 2022, 83 percent of the targeted routine maintenance line miles to audit were audited.
- (c) Target pass rate for routine cycle maintenance in 2022 was not identified.

- (d) Total number of target miles: 307.2.
- (e) The 99 percent pass rate applies to the 83 percent of audited miles.
- (f) Through traditional ground post audits and aerial inspections/audits, these transmission lines are inspected/audited by PacifiCorp frequently, in some cases multiple times a year. Vegetation conditions are reviewed by PacifiCorp foresters and line patrolman. The remaining line miles (17 percent) were either reviewed via aerial flights, in areas of recent wildfires and subsequently addressed through wildfire response workflow management, or all areas where work was conducted were reviewed. In addition, since end of 2022, these lines have been reinspected and conditions worked.