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PacifiCorp’s Q1 2023 QDR - In the “Table 2” tab of the Q1 2023 QDR, PacifiCorp reports the median hours for “Time between level 1 asset inspection and resulting maintenance activity” in its HFTD areas. The values are summarized in the table below.

| Area | Hours | Days |
|-------------|-------|------|
| HFTD Tier 3 | 696 | 29.0 |
| HFTD Tier 2 | 420 | 17.5 |
| Non HFTD | 336 | 14.0 |

According to General Order 95, utilities must “[t]ake action immediately, either by fully repairing the condition, or by temporarily repairing and reclassifying the condition to a lower priority.”

- (a) Please provide an explanation for the substantial amount of time it took PacifiCorp to address level 1 asset corrective findings in its HFTD Tier 3 areas.
- (b) Please provide an explanation for the substantial amount of time it took PacifiCorp to address level 1 asset corrective findings in its HFTD Tier 2 areas.
- (c) Please provide an explanation why HFTD Tier 3 level 1 asset findings take longer to complete than level 1 asset findings in Non-HFTD and Tier 2.

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The Company utilizes internal procedure (Procedure 069) that outlines the conditions being assessed during the inspection process. This procedure assigns a priority level to each condition being found. The Company designates level 1 Safety Hazards as specified by General Order (GO) 95 as A conditions. Depending on the severity of the A condition it can be defined as an imminent danger which has an imminent risk to safety or reliability. When a condition is found to be an imminent danger during inspection, local operations is notified immediately, and the inspector does not leave the site until the condition has been addressed. Based on the Company’s facility point inspection (FPI) mainframe limitations, these conditions get recorded as A conditions with correction timeframes within one day, however in reality the correction timeframes are much sooner.

The data provided in Table 2 of PacifiCorp’s Q1 2023 Quarterly Data Report (QDR) includes the correction time for all conditions that were designated as an A condition per Company Procedure 069. The Company’s internal Policy 192 requires A conditions that

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are imminent dangers to be corrected immediately. For any A conditions that are not imminent dangers, the policy allows for up to 30 days.

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.