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Re: CA R.18-10-007
CalAdvocates-PacifiCorp-2020WMP-01

Please find enclosed PacifiCorp's response to CalPA data requests 1-3.

If you have any questions, please call me at (503) 813-7314.

Sincerely,

____/s/____

Pooja Kishore
Manager, Regulation

CalPA Data Request 1

Please clarify how PacifiCorp uses the terms “ignition” and “near miss” in PacifiCorp’s 2020 Wildfire Mitigation Plan (and all associated data and metrics submitted to the Commission’s Wildfire Safety Division).

- a. Does PacifiCorp use the term “ignition” as synonymous with “CPUC-Reportable Event”?¹
- b. If the answers to question 1a is no, please provide PacifiCorp’s definition of “ignition” as used in PacifiCorp’s 2020 Wildfire Mitigation Plan (and all associated data and metrics submitted to the Commission’s Wildfire Safety Division).

Response to CalPA Data Request 1

- a. No.
- b. Ignition, as otherwise used in PacifiCorp’s WMP relates to a heat source serving as a sufficient input to the fire triangle (fuel/oxygen/heat) to result in a realized fire. A figure demonstrating the concept used by PacifiCorp is shown in Figure 1 on page 39 of the 2020 WMP. Generally ignition could be the result of a variety of causes, as recorded in databases such as those databases maintained by CalFIRE and other fire management organizations.

Respondent: Heide Caswell

¹ D. 14-02-015, *Decision Adopting Regulations to Reduce the Fire Hazards Associated with Overhead Electric Utility Facilities and Aerial Communications Facilities*, issued February 5, 2014 in R.08-11-005, p. C-3:

“CPUC-Reportable Event” means “any event where utility facilities are associated with the following conditions: (a) A self-propagating fire of material other than electrical and/or communication facilities, and (b) The resulting fire traveled greater than one linear meter from the ignition point, and (c) The utility has knowledge that the fire occurred.

Ignition Point is the location, excluding utilities facilities, where a rapid, exothermic reaction was initiated that propagated and caused the material involved to undergo change, producing temperatures greatly in excess of ambient temperature.”

CalPA Data Request 2

Please clarify how PacifiCorp uses the term “near miss” in PacifiCorp’s 2020 Wildfire Mitigation Plan (and all associated data and metrics submitted to the Commission’s Wildfire Safety Division),

- a. Does PacifiCorp use “near miss” as defined in the December 16, 2019 WMP Guidelines?¹
- b. If the answer to question 2a is yes, please explain how PacifiCorp determines whether an event entails “significant probability of ignition.”
- c. If the answer to question 2a is no, please provide PacifiCorp’s definition of “near miss” as used in PacifiCorp’s 2020 Wildfire Mitigation Plan (and all associated data and metrics submitted to the Commission’s Wildfire Safety Division).

Response to CalPA Data Request 2

- a. Yes; the company applied this definition when compiling data in support of its 2020 Wildfire Mitigation Plan data.
- b. The company interpreted forced outages where fault current could be generated to act as a proxy for the near miss classification. For an outage which was intentional (such as when construction was underway) or when an upstream system was out of service (like from a loss of supply event), no fault current is generated, thus no heat source exists that could support ignition.
- c. Not applicable.

Respondent: Heide Caswell

¹ *Administrative Law Judge’s Ruling on Wildfire Mitigation Plan Templates and Related Material and Allowing Comment*, R.18-10-007 December 16, 2019, Attachment 1, WMP Guidelines, (December 16, 2019 WMP Guidelines) p. 11.

“Near miss” means “An event with significant probability of ignition, including wires down, contacts with objects, line slap, events with evidence of significant heat generation, and other events that cause sparking or have the potential to cause ignition.”

CalPA Data Request 3

Please explain how PacifiCorp distinguishes between an ignition and a Near Miss.

Response to CalPA Data Request 3

These two concepts are distinguished explicitly in PacifiCorp's 2020 California Wildfire Mitigation Plan (WMP) as follows. A near miss was interpreted to be an outage which could generate fault current. Generally, in its WMP, PacifiCorp identifies all ignitions as those which are contained in databases maintained by fire management organizations, such as CalFIRE, or within utilities' fire reporting databases. One exception was Table 2, metric #10, which defined an ignition as events that are CPUC-reportable.

Respondent: Heide Caswell