

CalPA Data Request 11.1

2022 WMP Update submission, and to the attached Follow-up Accident Report submitted to the CPUC regarding the Slater Fire (the “Accident Report”), dated October, 16, 2020.¹ If the responses include privileged information or legal analysis or conclusions as well as technical and policy conclusions, please provide a version with the privileged and legal analysis/conclusions redacted.

The Accident Report states that “Pacific Power is conducting a full investigation of the cause and origin of the fire”.

- (a) What kinds of investigations has PacifiCorp conducted into the cause and origin of the Slater Fire?
- (b) Has PacifiCorp conducted a root cause analysis of the Slater Fire?
- (c) Please include all documentation relating to technical and policy conclusions from the analyses and investigations discussed in parts (a) and (b) above. If the responsive documents include legal analysis or conclusions as well as technical and policy conclusions, please provide a version with the legal analysis/conclusions redacted.

Response to CalPA Data Request 11.1

PacifiCorp objects; PacifiCorp’s investigation of the cause and origin of the Slater Fire is protected by the attorney-client privilege and the attorney work product doctrine; there is pending litigation related to the Slater Fire. Subject to objections, PacifiCorp responds as follows: on September 8, 2020, PacifiCorp’s Office of General Counsel initiated a confidential and privileged investigation regarding the cause and origin of the Slater Fire. The privileged investigation was initiated and conducted to aid PacifiCorp’s counsel with the provision of legal advice in connection with current and/or anticipated litigation and to prepare for trial, and is, therefore, conducted under the attorney-client privilege and protected by the attorney work product doctrine. PacifiCorp employees operating under the supervision and direction of counsel, including PacifiCorp engineers, foresters, and line personnel, have confidentially assisted PacifiCorp’s Office of General Counsel and PacifiCorp’s outside litigation counsel with the privileged investigation. PacifiCorp’s Office of General Counsel and PacifiCorp’s outside litigation counsel have also consulted with retained experts. PacifiCorp’s outside counsel, in-house counsel, claims investigators, and subject matter experts have spent considerable time and expense conducting PacifiCorp’s investigation into the cause and origin of the Slater Fire. Litigation regarding the Slater Fire is ongoing, and the privileged investigation continues to this day. PacifiCorp’s legal team is not typically involved in PacifiCorp’s investigations into the cause and origin of powerline-adjacent fires unless litigation is

¹ “Follow-Up Accident Report to the California Public Utilities Commission,” Pacific Power, October 16, 2020.

expected. When litigation is expected, as here, a primary purpose of the investigation is to assist counsel in preparing for trial. The only analysis of the cause and origin of the Slater Fire that PacifiCorp has conducted has been through its privileged investigation. For certain incidents, PacifiCorp employees may be involved in an analysis to determine whether electric facilities were involved in any fire ignition. Because of the immediate threat of litigation with respect to the Slater Fire, however, this type of analysis did not occur with respect to the Slater Fire. Instead, PacifiCorp's Office of General Counsel immediately initiated the investigation in anticipation of litigation. Providing responses to the above questions would reveal information regarding PacifiCorp's privileged investigation. PacifiCorp also objects that these questions are duplicative of CalPA Data Request Set 6. PacifiCorp intends to provide supplemental responses to CalPA Data Request Set 6, questions 1 through 4 which overlap substantively with these questions.

CalPA Data Request 11.2

2022 WMP Update submission, and to the attached Follow-up Accident Report submitted to the CPUC regarding the Slater Fire (the “Accident Report”), dated October, 16, 2020.¹ If the responses include privileged information or legal analysis or conclusions as well as technical and policy conclusions, please provide a version with the privileged and legal analysis/conclusions redacted.

- (a) Did PacifiCorp personnel (such as a trouble-person) respond to the ignition of the Slater Fire by visiting the scene of this incident within 48 hours of the ignition?
- (b) If the answer to part (a) is yes, please identify the job title(s) of each person who responded to the incident.
- (c) If the answer to part (a) is yes, what did the PacifiCorp personnel who responded conclude about how and where the fire ignited?
- (d) If the answer to part (a) is no, please explain why not.

Response to CalPA Data Request 11.2

- (a) PacifiCorp objects that the “scene of the incident” is ambiguous and not defined. PacifiCorp will interpret the “scene of the incident” to mean the area under investigation by the investigating agency, United States Forest Service (USFS), at the span between Pole Nos. 135300 and 136300 on Circuit 5G16. Subject to this interpretation, PacifiCorp responds as follows: PacifiCorp was not allowed to access the scene of the incident by USFS in the first 48 hours after the fire, though PacifiCorp notes that on the morning of September 8, 2020, PacifiCorp Serviceman Randy Zink responded to the fire by manually opening a fuse at Pole No. 143300 on the tap line referenced in the Company’s response to CalPA Data Request 11.4 subpart (a).
- (b) PacifiCorp Serviceman Randy Zink.
- (c) Not applicable as USFS restricted access to the scene of the incident.
- (d) USFS prohibited access to the scene of the incident until September 15, 2020, when PacifiCorp’s field operations was granted limited access to the area in order to conduct repairs.

¹ “Follow-Up Accident Report to the California Public Utilities Commission,” Pacific Power, October 16, 2020.

CalPA Data Request 11.3

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- (a) Did PacifiCorp perform an engineering analysis to determine the causes of the Slater Fire?
- (b) If the answer to part (a) is yes, what were the conclusions of this analysis?

Response to CalPA Data Request 11.3

Please refer to the Company’s response to CalPA Data Request 11.1.

¹ “Follow-Up Accident Report to the California Public Utilities Commission,” Pacific Power, October 16, 2020.

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.

CalPA Data Request 11.4

2022 WMP Update submission, and to the attached Follow-up Accident Report submitted to the CPUC regarding the Slater Fire (the “Accident Report”), dated October, 16, 2020.¹ If the responses include privileged information or legal analysis or conclusions as well as technical and policy conclusions, please provide a version with the privileged and legal analysis/conclusions redacted.

- (a) Please identify the circuit and circuit-segment nearest to the location where the Slater Fire started.
- (b) Please state when the above-identified circuit segment had been last subject to a vegetation management inspection prior to the Slater Fire.
- (c) Please provide any vegetation corrective notifications identified by as part of the most recent vegetation management inspections conducted prior to the Slater Fire.
- (d) Please state when you last performed vegetation management work (i.e., tree trimming or removal) on the above-identified circuit segment prior to the Slater Fire.
- (e) Please state when the above-identified circuit segment had been last subject to detailed asset inspections prior to the Slater Fire.
- (f) Please provide any asset maintenance corrective notifications identified as part of the most recent asset management inspections conducted prior to the Slater Fire.
- (g) At the time the ignition occurred, was the above-identified circuit segment scoped for inclusion in any system hardening programs in PacifiCorp’s 2020 Wildfire Mitigation Plan (for work to be performed during the 2020-2022 WMP cycle)?
- (h) If the answer to part (d) is yes, identify the type of system hardening project(s) that PacifiCorp planned to perform on this circuit segment in its 2020 Wildfire Mitigation Plan.

Response to CalPA Data Request 11.4

- (a) The precise location of the Slater Fire’s ignition remains under investigation. PacifiCorp understands that the United States Forest Service (USFS) focused its investigation on a tap line on Circuit 5G16 that terminates in the USFS Slater Butte lookout tower, and more specifically, the span between Pole Nos. 135300 and 136300.

¹ “Follow-Up Accident Report to the California Public Utilities Commission,” Pacific Power, October 16, 2020.

- (b) Based on a reasonable investigation, a vegetation management audit of the tap line was performed on or about September 3, 2020. Copies of the five most recent vegetation management patrol inspections conducted on Circuit 5G16 were produced to the California Public Utility Commission (CPUC) Safety and Enforcement Division (SED) with Bates numbers PC-SED-SLATER000000033 to PC-SED-SLATER000000313. Documents reflecting vegetation management records for Circuit 5G16 for the last five years were produced to the CPUC SED with Bates numbers PC-SED-SLATER000001243 to PC-SED-SLATER000001933.
- (c) PacifiCorp objects that the question is overbroad, unduly burdensome, and ambiguous as it is not limited to the subject span. To the extent information is requested regarding the subject span, please refer to the Company's response to subpart (b) above.
- (d) Based on a reasonable investigation, a PacifiCorp contractor completed vegetation management work at the tap line on or about July 1, 2020. Please also refer to the Company's response to subpart (b) above
- (e) Please refer to the Company's response below:
1. When an asset inspection associated with PacifiCorp's inspection and correction programs is performed on a PacifiCorp facility, an inspection record is created in the Facility Point Inspection (FPI) system, the PacifiCorp's system of record for overhead and underground facilities. PacifiCorp uses the following convention and meaning when creating inspection records of different types:
 - i. SAFETY: An inspection record indicative of performing a safety inspection, also referred to as a patrol or visual assurance inspection.
 - ii. DETAIL: An inspection record indicative of performing a SAFETY inspection as well as a DETAILED inspection.
 - iii. Pole Treat & Test (PTT): An inspection record indicative of performing a SAFETY inspection, DETAILED inspection, and a PTT inspection, also known as an intrusive test.
 2. Therefore, when reviewing PacifiCorp's inspection records, the presence of a DETAIL inspection record indicates that PacifiCorp or its contractors performed both a SAFETY and a DETAIL inspection. Similarly, the presence of a PTT inspection record indicates that PacifiCorp or its contractors performed a SAFETY, DETAIL, and PTT inspection. In addition to traditional inspection types and methods, PacifiCorp conducts ENHANCED inspections. Currently,

PacifiCorp's ENHANCED inspections are exclusive to PacifiCorp's 69 kilovolt (kV) distribution facilities.

- i. ENHANCED: An inspection performed using additional tools and technology performed in addition to transition inspections and inspection methods – typically infrared (IR) technology.
3. Based on a reasonable investigation, PacifiCorp provides the following information for Pole No. 135300 and Pole No. 136300: Detail inspections were performed on or about 6/7/2017; Safety inspections were performed on or about 5/1/2020. PacifiCorp previously produced inspection records from the FPI system, PacifiCorp's system of record, to the CPUC SED at Bates numbers PC-SED-SLATER000000314 to PC-SED-SLATER000000316.
 - (f) PacifiCorp objects that the question is overbroad, unduly burdensome, and ambiguous as it is not limited to the subject span. To the extent information is requested regarding the subject span, based on a reasonable investigation, no conditions were identified for Pole No. 135300 and Pole No. 136300 based on the most recent Detail and Patrol inspections. PacifiCorp previously produced condition records from the FPI system, PacifiCorp's system of record, to the CPUC SED at Bates number PC-SED-SLATER000000024.
 - (g) Circuit 5G16 between Pole Nos. 135300 to 136300 was not scoped for inclusion in PacifiCorp's Wildfire Mitigation Plan (WMP) system hardening initiatives and system hardening work was not completed on that segment in 2020-2022. PacifiCorp does plan to include Circuit 5G16 in its Line Rebuild program for 2023, which includes covered conductor, pole replacement, and small copper diameter replacement.
 - (h) Please refer to the Company's response to subpart (g) above.

CalPA Data Request 11.5

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- (a) Based on PacifiCorp’s experience with the Slater Fire, what have PacifiCorp’s subject matter experts and engineers learned about safely operating PacifiCorp’s system?
- (b) Based on PacifiCorp’s experience with the Slater Fire, what have PacifiCorp’s managers and executives learned about safely operating PacifiCorp’s system?

Response to CalPA Data Request 11.5

Please refer to the Company’s response to CalPA Data Request 11.1.

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CalPA Data Request 11.6

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- (a) What PacifiCorp company policies were adopted as a result of the Slater Fire? Please list each policy and its rationale separately.
- (b) What PacifiCorp company policies were changed as a result of the Slater Fire? Please list each company policy, the change made, and the rationale for such change separately.
- (c) Did PacifiCorp change its wildfire mitigation priorities as a result of the Slater Fire? If so, please explain how. Please list each priority change and its rationale separately.

Response to CalPA Data Request 11.6

Please refer to the Company’s response to CalPA Data Request 11.1.

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CalPA Data Request 11.7

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How did the Slater Fire influence or change PacifiCorp’s practices in each of these WMP initiative categories:

- (a) Risk assessment and mapping.
- (b) Situational awareness and forecasting.
- (c) Grid design and system hardening.
- (d) Asset management and inspections.
- (e) Vegetation management and inspections.
- (f) Grid operations and protocols.
- (g) Data governance.
- (h) Resource allocation methodology.
- (i) Emergency planning and preparedness.
- (j) Stakeholder cooperation and community engagement.

Response to CalPA Data Request 11.7

Please refer to the Company’s response to CalPA Data Request 11.1.

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CalPA Data Request 11.8

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- (a) Did the Slater Fire influence PacifiCorp’s thresholds for Public Safety Power Shutoff (PSPS) events?
- (b) If the answer to part (a) is yes, please describe how PacifiCorp modified its thresholds for PSPS events as a result of the Slater Fire.
- (c) Aside from thresholds, did the Slater Fire influence or change PacifiCorp’s other practices regarding PSPS events (such as customer notification procedures, coordination with public safety partners, and initiatives to provide backup power options to vulnerable customers, among other things)?
- (d) If the answer to part (c) is yes, please describe how the Slater Fire influenced PacifiCorp’s PSPS practices aside from thresholds. Describe each change in these practices.

Response to CalPA Data Request 11.8

Please refer to the Company’s response to CalPA Data Request 11.1.

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