

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**

Order Instituting Rulemaking to Implement Electric
Utility Wildfire Mitigation Plans Pursuant to Senate
Bill 901 (2018).

Rulemaking 18-10-007
(Filed October 25, 2018)

**PACIFICORP'S (U 901 E) RESPONSE TO ADMINISTRATIVE LAW JUDGE'S
RULING SEEKING ADDITIONAL INFORMATION ON WILDFIRE MITIGATION
PLANS AND NOTICE REGARDING THE LOCATION OF DOCUMENTS
REFERENCED IN PACIFICORP'S WILDFIRE MITIGATION PLAN**

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February 26, 2019

Attorney for PacifiCorp

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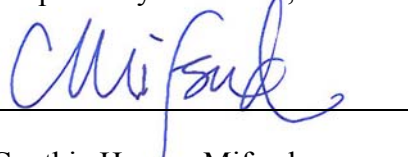
In accordance with the February 21, 2019 Administrative Law Judge’s Ruling Seeking Additional Information on Wildfire Mitigation Plans (Ruling), PacifiCorp, d.b.a. Pacific Power (“PacifiCorp”), submits its response to the applicable questions in the Ruling.

In addition, as required under Paragraph 4 of the February 19, 2019 E-Mail Ruling Regarding Discovery/Data Requests and Other Supporting Information, PacifiCorp provides notice that the documents referenced in PacifiCorp’s Wildfire Mitigation Plan filed February 6, 2019, are located and available for review at the following website:

www.pacificorp.com/wildfire-plans.

Dated: February 26, 2019

Respectfully submitted,



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ALJ-SRT Data Request 7

Categorize the risk/resilience programs in Table 3 (page 16), outage category/ignition sources in Table 4 (page 25) and any other applicable risks and drivers according to the risk/driver categories included in Plan Element III(B) of the January 17, 2019 ruling template (*i.e.*, (1) Design and Construction, (2) Inspection and Maintenance, (3) Operational Practices, (4) Situational/Conditional Awareness, and (5) Response and Recovery).

Response to ALJ-SRT Data Request 7

Please refer to Attachment ALJ-SRT 7 for a table showing the requested categories for the risk/resiliency programs that were included in PacifiCorp’s general rate case application (A.) 18-04-002. Please note that many programs address more than one fire risk and fall in more than one category. Also, a few programs address non-fire risks as noted on the attachment.

The outage category/ignition sources included in Table 4 on page 25 were developed based on PacifiCorp’s knowledge of historic and potential causes of fires in CA. As included in Table 6 on page 28 in Section III.D.2, these outage categories/ignition sources were used to inform PacifiCorp’s specific wildfire mitigation programs where each outage category/ignition source may inform multiple risk/driver categories as included in Plan Element III(B) of the January 17, 2019 ruling. However, where applicable, PacifiCorp further mapped these outage categories/ignition sources to the risk/driver categories included in Plan Element III(B) of the January 17, 2019 ruling in. See table below.

Outage Category/Potential Ignition Source	Fire Risk Ranking	Do Legacy Programs Exist Included in GRC?	Need for Change or Expansion	Proposed Additional Mitigation Programs	Equivalent Risk/Driver
EQUIPMENT DETERIORATION/FAILURE	HIGH	YES	YES	- Enhanced Inspect/Correct Programs - Asset Health Indexing and risk based decision making	Inspection and Maintenance
NOT CLASSIFIABLE	HIGH	YES	YES	- Asset Hardening: Structural - Operational Programs	Design and Construction; Operational Practices
WEATHER/WIND	HIGH	YES	YES	- Public Safety Power Shut-Off (PSPS)	Operational Practices; Situational Awareness/ Conditional Awareness
ANIMALS	HIGH	YES	YES	- Asset Hardening: Enhanced Wildlife Protection Plan	Design and Construction;
TREE-NONPREVENTABLE	MIN	NO	YES	- Asset Hardening: Structural - Operational Programs	Design and Construction; Operational Practices

R.18-10-007/ PacifiCorp

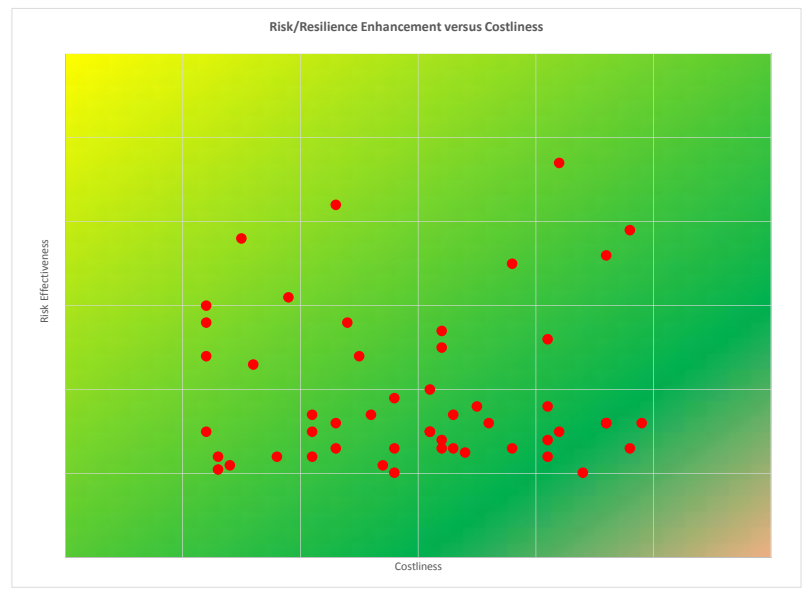
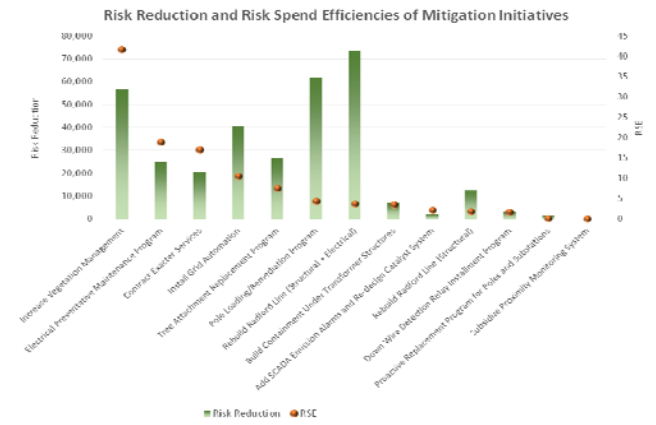
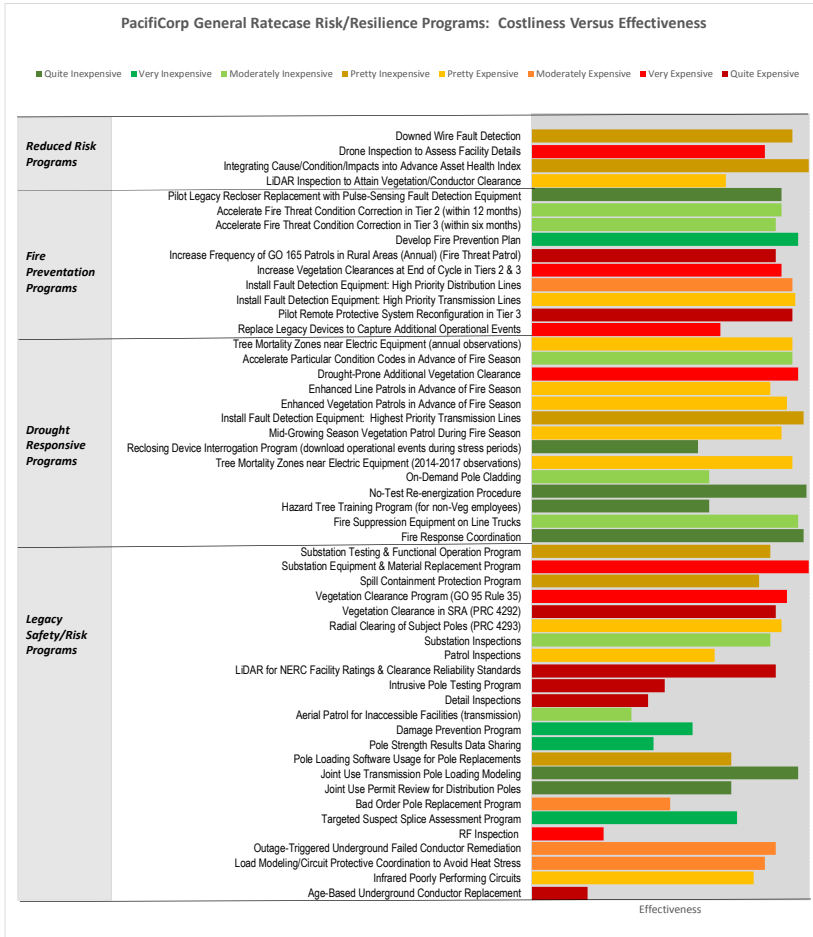
February 26, 2019

ALJ-SRT 7

NON-UTILITY CAUSE	MID	YES	YES	- Asset Hardening: Structural - Enhanced Emergency Response Plan	Design and Construction; Response and Recovery
ENVIRONMENT	MID	NO	YES	- Wildlife Assessment Program (not-protected species)	Design and Construction;
OPERATIONAL	MID	NO	YES	- Enhanced Operations Wildfire Mitigation Plan	Operational Practices
VEGETATION	MID	YES	YES	- Enhanced Vegetation Management	Design and Construction; Inspection and Maintenance
EQUIPMENT MIS-OPERATION	LOW	YES	YES	- Enhanced Inspect/Correct Programs	Inspection and Maintenance
LIGHTNING	LOW	YES	YES	- Lightning Detection for Situational Awareness - Lightning-Resilient Infrastructure Modifications	Design and Construction; Situational Awareness/ Conditional Awareness

Attachment ALJ-SRT 7

					Cost	Effectiveness	Inverse value	5	4.5	4	3.5	3	2.5	2	1.5
								4.5	4	3.5	3	2.5	2	1.5	1
								Quite Expensive	Very Expensive	Moderately Expensive	Pretty Expensive	Pretty Inexpensive	Moderately Inexpensive	Very Inexpensive	Quite Inexpensive
					Base Case Risk/Resilience Programs										
1.	2.	3.	4.	5.	Does not align with Fire Risk										
Design & Construction	Inspection & Maintenance	Operational Practices	Situational/ Conditional Awareness	Response & Recovery											
					x	Age-Based Underground Conductor Replacement	4.99	1.01	4.99	1.01					
	x	x	x	x		Infrared Poorly Performing Circuits	3.1	4	2			4			
x	x	x	x	x		Load Modeling/Circuit Protective Coordination to Avoid Heat Stress	3.5	4.2	1.8				4.2		
					x	Outage-Triggered Underground Failed Conductor Remediation	3.6	4.4	1.6			4.4			
						RF Inspection	4.2	1.3	4.7		1.3				
						Targeted Suspect Splice Assessment Program	1.6	3.7	2.3					3.7	
						Bad Order Pole Replacement Program	3.8	2.5	3.5			2.5			
						Joint Use Permit Review for Distribution Poles	1.2	3.6	2.4						3.6
x	x	x		x		Joint Use Transmission Pole Loading Modeling	1.3	4.8	1.2						4.8
x	x	x		x		Pole Loading Software Usage for Pole Replacements	2.5	3.6	2.4			3.6			
x	x	x		x		Pole Strength Results Data Sharing	1.5	2.2	3.8						2.2
						Damage Prevention Program	1.9	2.9	3.1						2.9
						Aerial Patrol for Inaccessible Facilities (transmission)	2.3	1.8	4.2				1.8		
						Detail Inspections	4.8	2.1	3.9	2.1					
x	x	x		x		Intrusive Pole Testing Program	4.6	2.4	3.6	2.4					
						LIDAR for NERC Facility Ratings & Clearance Reliability Standards	4.9	4.4	1.6	4.4					
						Patrol Inspections	3.2	3.3	2.7			3.3			
						Substation Inspections	2.1	4.3	1.7				4.3		
						Radial Clearing of Subject Poles (PRC 4293)	3.1	4.5	1.5			4.5			
						Vegetation Clearance in SRA (PRC 4292)	4.6	4.4	1.6	4.4					
						Vegetation Clearance Program (GO 95 Rule 35)	4.1	4.6	1.4		4.6				
						Spill Containment Protection Program	2.8	4.1	1.9			4.1			
						Substation Equipment & Material Replacement Program	4.4	4.99	1.01		4.99				
						Substation Testing & Functional Operation Program	2.6	4.3	1.7				4.3		
						Fire Response Coordination	1.4	4.9	1.1						4.9
						Fire Suppression Equipment on Line Trucks	2.1	4.8	1.2					4.8	
	x	x		x		Hazard Tree Training Program (for non-Veg employees)	1.2	3.2	2.8						3.2
						No-Test Re-energization Procedure	1.3	4.95	1.05						4.95
						On-Demand Pole Cladding	2.4	3.2	2.8					3.2	
						Tree Mortality Zones near Electric Equipment (2014-2017 observations)	3.2	4.7	1.3			4.7			
						Reclosing Device Interrogation Program (download operational events during stress periods)	1.2	3	3						3
						Mid-Growing Season Vegetation Patrol During Fire Season	3.1	4.5	1.5			4.5			
						Install Fault Detection Equipment: Highest Priority Transmission Lines	2.7	4.9	1.1				4.9		
						Enhanced Vegetation Patrols in Advance of Fire Season	3.2	4.6	1.4				4.6		
						Enhanced Line Patrols in Advance of Fire Season	3.3	4.3	1.7				4.3		
						Drought-Prone Additional Vegetation Clearance	4.1	4.8	1.2		4.8				
						Accelerate Particular Condition Codes in Advance of Fire Season	2.3	4.7	1.3					4.7	
						Tree Mortality Zones near Electric Equipment (annual observations)	3.3	4.7	1.3			4.7			
x	x	x		x		Replace Legacy Devices to Capture Additional Operational Events	4.1	3.4	2.6		3.4				
x	x	x		x		Pilot Remote Protective System Reconfiguration in Tier 3	4.8	4.7	1.3	4.7					
x	x	x		x		Install Fault Detection Equipment: High Priority Transmission Lines	3.4	4.75	1.25			4.75			
x	x	x		x		Install Fault Detection Equipment: High Priority Distribution Lines	3.8	4.7	1.3			4.7			
						Increase Vegetation Clearances at End of Cycle in Tiers 2 & 3	4.2	4.5	1.5		4.5				
						Increase Frequency of GO 165 Patrols in Rural Areas (Annual) (Fire Threat Patrol)	4.6	4.4	1.6	4.4					
						Develop Fire Prevention Plan	1.8	4.8	1.2						4.8
						Accelerate Fire Threat Condition Correction in Tier 3 (within six months)	2.3	4.4	1.6					4.4	
						Accelerate Fire Threat Condition Correction in Tier 2 (within 12 months)	2.1	4.5	1.5					4.5	
x						Pilot Legacy Recloser Replacement with Pulse-Sensing Fault Detection Equipment	1.2	4.5	1.5			3.5			4.5
						LIDAR Inspection to Attain Vegetation/Conductor Clearance	3.2	3.5	2.5						
						Integrating Cause/Condition/Impacts into Advance Asset Health Index	2.8	4.99	1.01				4.99		
						Drone Inspection to Assess Facility Details	4.1	4.2	1.8		4.2				
						Downed Wire Fault Detection	2.8	4.7	1.3				4.7		



ALJ-SRT Data Request 8

Describe and quantify the effectiveness of the measures included in PacifiCorp’s Fire Prevention Plan (included as Attachment E to PacifiCorp’s Wildfire Mitigation Plan). To the greatest extent possible, use the same metrics proposed in Table 32 (page 80), and any other appropriate metrics that PacifiCorp tracks, for the past three years.

Response to ALJ-SRT Data Request 8

PacifiCorp did not propose measures in its 2018 GO 166 filing included as Attachment E to PacifiCorp’s Fire Prevention Plan. However, for purposes of responding to this request, PacifiCorp applies the effectiveness metrics proposed in PacifiCorp’s 2019 Wildfire Mitigation Plan (Table 32, page 80) to the three-year period between 2016 and 2018. PacifiCorp cautions that establishing the proper baseline from which to measure the effectiveness of the measures proposed in PacifiCorp’s Wildfire Mitigation Plan is important and it may be that the baselines is more properly established by reference to a historical period of time that is longer than three years.

Document Reference	Data Source	Specific Metric	Indicator	Measure of Effectiveness	2016	2017	2018
Section III.D.1- Fire History	Cal Fire Perimeter Data Set	Power Line Fires in PacifiCorp’s Service Territory	Sum of Acres Affected	No material increase	0	0	0
Section III.D.1- Fire History	PacifiCorp outage database	Events recorded with fire reference	Count of events	Reduction in general trend of events	3	4	16
Section III.D.1- Fire History	PacifiCorp outage database	Events recorded with fire reference: damage fire, equipment fire, pole fire	Count of events	Reduction in general trend of events	3	4	5
Section III.D.2– Fire Risk Assessment	PacifiCorp outage database	Potential ignition sources	Count of events	Reduction in general trend of events	370	548	502

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CERTIFICATE OF SERVICE

I hereby certify that I have this day served a copy of the **PACIFICORP'S (U 901 E) RESPONSE TO ADMINISTRATIVE LAW JUDGE'S RULING SEEKING ADDITIONAL INFORMATION ON WILDFIRE MITIGATION PLANS AND NOTICE REGARDING THE LOCATION OF DOCUMENTS REFERENCED IN PACIFICORP'S WILDFIRE MITIGATION PLAN** on all known parties to R.18-10-007 by transmitting an e-mail message, or by US Mail if an e-mail address has not been provided, with the document attached to each person named in the official service list.

(See the attached Service List R.18-10-007)

A hard copy of the filed documents were also overnighted to ALJ Peter V. Allen and ALJ Sarah R. Thomas.

Executed on **February 26, 2019**, at Portland, Oregon.



Katie Savarin
Coordinator, Regulatory Operations



California
Public Utilities
Commission



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CALIFORNIA PUBLIC UTILITIES COMMISSION

Service Lists

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FILER: CPUC
LIST NAME: LIST
LAST CHANGED: FEBRUARY 25, 2019

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