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PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

SAFETY POLICY DIVISION

Resolution SPD-36

June 26, 2025

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R E S O L U T I O N

RESOLUTION SPD-36 Regarding Action of the Office of Energy Infrastructure Safety on PacifiCorp's 2025 Wildfire Mitigation Plan Update Pursuant to Public Utilities Code Section 8386.3(a).

This Resolution ratifies the attached Decision (Appendix A hereto) of the Office of Energy Infrastructure Safety (Energy Safety) approving PacifiCorp's (PacifiCorp, or electrical corporation) 2025 Wildfire Mitigation Plan (WMP) Update pursuant to Public Utilities Code (Pub. Util. Code) Section 8386.3(a).

This Resolution acts on the WMP submitted on July 8, 2024, and revised on September 20, 2024, pursuant to the Commission's obligations under Pub. Util. Code Section 8386.3(a). PacifiCorp's WMP responds to a list of 23 requirements set forth in Pub. Util. Code Section 8386(c). PacifiCorp submitted a comprehensive WMP in 2023 covering the three-year period 2023–2025. That WMP filing focused on measures the electrical corporation will take to reduce the risk of, and impact from, a catastrophic wildfire related to its electrical infrastructure and equipment. PacifiCorp's 2025 WMP Update provides information on PacifiCorp's progress over the past year as well as its 2024 and 2025 projections. Pursuant to Pub. Util. Code Section 8386(b), electrical corporations must annually prepare and submit a WMP to Energy Safety for review and approval. Furthermore, Energy Safety may allow the annual submissions to be updates to the last approved comprehensive wildfire mitigation plan. In 2024, each electrical corporation was required to provide an update (2025 WMP Update) to its approved 2023–2025 Base WMP. In addition, the 2025 WMP Update responds to any additional requirements and metrics approved by the Commission, pursuant to Pub. Util. Code Section 8389(d), in resolutions SPD-26 and SPD-27 as well as the 2025 WMP Update Guidelines adopted by Energy Safety.¹

¹ Energy Safety's 2025 Wildfire Mitigation Plan Update Guidelines (adopted Jan. 2024, published Feb. 2024):

<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56254&shareable=true>.

Pub. Util. Code Section 8386.3(a) provides that “After approval [of the 2025 WMP Update by Energy Safety,] the [C]ommission shall ratify the action of [Energy Safety].”

PROPOSED OUTCOME:

- Ratifies the attached Decision of Energy Safety to approve the 2025 WMP Update of PacifiCorp.
- Does not approve costs attributable to WMPs, as Pub. Util. Code Section 8386.4(b) requires electrical corporations to seek and prove the legitimacy of all expenditures in their general rate cases (GRC) or other applications for cost recovery.
- Does not establish a defense to any enforcement action for a violation of a Commission decision, order, or rule.

SAFETY CONSIDERATIONS:

Mitigation of catastrophic wildfires in California is among the most important safety challenges the Commission-regulated electrical corporations face. Comprehensive WMPs are essential to safety because the WMPs articulate an electrical corporation’s understanding of its utility-related wildfire risk and the proposed actions to reduce that risk and prevent catastrophic wildfires caused by utility infrastructure and equipment.

Utility-related catastrophic wildfire risk should be reduced over time by implementing measures such as vegetation management, system hardening (such as undergrounding power lines, covering conductors on overhead lines, and removing or upgrading equipment most likely to cause fire ignition), making grid topology improvements (such as installation and operation of electrical equipment to sectionalize or island portions of the grid), improving asset inspection and maintenance, situational awareness (such as cameras, weather stations, and use of data to predict areas of highest fire threat), improving community engagement and awareness, and other measures.

ESTIMATED COST:

- Costs are not considered in this Resolution, as Pub. Util. Code Section 8386.4(b) provides for Commission cost review in a utility GRC or separate application. Nothing in this Resolution should be construed as approval of the costs associated with the WMP mitigation efforts.

- For illustrative purposes, Table 1, below, contains PacifiCorp's actual costs for 2023 and 2024, and its projected costs for the implementation of wildfire mitigation efforts in its 2023–2025 WMP.

Table 1: PacifiCorp's 2023–2025 WMP Costs²

Costs by Year	Costs in \$USD
Actual 2023 costs	\$137,179
Actual 2024 costs	\$165,764
Proposed 2025 costs	\$148,287
Actual 2020–2022 WMP 3-year total costs	\$145,326
Difference between 2020–2022 actual and 2023–2025 actual/proposed costs (+/-)	-\$247,791
Proposed 2023–2025 WMP 3-year total costs	\$393,117

SUMMARY

This Resolution ratifies the attached Energy Safety Decision, issued on April 28, 2025, approving the 2025 WMP Update submitted by PacifiCorp on September 20, 2024, (Appendix A hereto).³ Pub. Util. Code Section 8386(c) requires that an electrical corporation's WMP contain 23 elements. Energy Safety's approval and the Commission's ratification do not relieve the electrical corporation from any otherwise applicable permitting, ratemaking, or other legal and regulatory obligations.

BACKGROUND

Since several catastrophic wildfires in the San Diego area in 2007, the equipment of electrical utilities the Commission regulates has been implicated in the most devastating wildfires in our state's history. The California Legislature enacted several measures requiring electrical corporations to submit, Energy Safety to review, approve, or otherwise act on, and the Commission to ratify, WMPs designed to reduce the risk of utility-related catastrophic wildfire. Catastrophic wildfires in 2017–2019 led the

² From Data Request response SPD_WSPS_PC_2025_001.

³ PacifiCorp's 2025 WMP Update can be found on the 2023–2025 Wildfire Mitigation Plan (2023–2025-WMPs) docket log at:

<https://efiling.energysafety.ca.gov/EFiling/DocketInformation.aspx?docketnumber=2023-2025-WMPs>.

California Legislature to pass Senate Bill 901⁴ in 2018 and its successor Assembly Bill (AB) 1054,⁵ as well as AB 111 in 2019.⁶

AB 1054 requires Energy Safety to review and approve or deny electrical corporations' WMPs, with Commission ratification of any approval to follow thereafter. Energy Safety oversees electrical corporations' compliance with the WMP.⁷ If Energy Safety determines an electrical corporation is not in compliance with its approved WMP, Energy Safety may recommend that the Commission pursue an enforcement action against the electrical corporation for noncompliance with its approved plan.⁸ The Commission may assess penalties on electrical corporations if they fail to substantially comply with their plans.⁹

2025 WMP Update Evaluation Process

The wildfire mitigation statute requires a three-year WMP and permits Energy Safety to require only a WMP update in the year following the three-year WMP period. Pursuant to Pub. Util. Code Section 8386(b),

Each electrical corporation shall annually prepare and submit a wildfire mitigation plan to the Wildfire Safety Division for review and approval. In calendar year 2020, and thereafter, the plan shall cover at least a three-year period. The division shall establish a schedule for the submission of subsequent comprehensive wildfire mitigation plans, which may allow for the staggering of compliance periods for each electrical corporation. In its discretion, the division may allow the annual submissions to be updates to the last approved comprehensive wildfire mitigation plan; provided, that each electrical corporation shall submit a comprehensive wildfire mitigation plan at least once every three years.

⁴ Stats. 2018, Ch. 626.

⁵ Stats. 2019, Ch. 79.

⁶ Stats. 2019, Ch. 81.

⁷ Pub. Util. Code Section 8386.3(c).

⁸ Pub. Util. Code Section 8389(g).

⁹ Pub. Util. Code Section 8386.1.

On January 26, 2024, Energy Safety issued a schedule allowing electrical corporations to submit updates to their WMPs in 2024, after requiring a comprehensive WMP for the preceding three-year periods.

On July 8, 2024, PacifiCorp submitted its 2025 WMP Update. PacifiCorp provided an overview of the WMP in a public workshop on July 31, 2024. Comments to Energy Safety on the 2025 WMP Update were due August 12, 2024, and reply comments were due August 22, 2024. Comments were submitted by California Department of Fish and Wildlife, Rural County Representatives of California, Green Power Institute, and the Public Advocates Office at the California Public Utilities Commission (Cal Advocates). On September 6, 2024, Energy Safety issued a rejection and ordered PacifiCorp to resubmit its 2025 WMP Update by September 3, 2024, in part because PacifiCorp failed to provide justification for several updates to targets, objectives, and expenditures. PacifiCorp resubmitted the 2025 WMP update on January 10, 2025. No comments were provided on PacifiCorp's resubmitted 2025 WMP update.

On February 11, 2025, Energy Safety published a draft Decision approving PacifiCorp's 2025 WMP Update for public comment.¹⁰ Comments on the draft Decision were due on March 17, 2025, and reply comments were due on March 27, 2025. Comments were provided to Energy Safety by Green Power Institute.

On April 28, 2025, Energy Safety issued its final Decision approving PacifiCorp's 2025 WMP Update.¹¹ Energy Safety identified 14 areas for continued improvement, in which PacifiCorp is required to demonstrate progress in its 2026-2028 Base WMP submittal.

In accordance with Pub. Util. Code Section 8386(d), notice of PacifiCorp's 2025 WMP Update was given by posting the WMP on Energy Safety's web page at [2025 Wildfire Mitigation Plan Updates | Office of Energy Infrastructure Safety \(ca.gov\)](https://www.energy.ca.gov/efiling/docketinformation.aspx?docketnumber=2023-2025-WMPs).¹²

¹⁰ Available on the 2023–2025 Wildfire Mitigation Plan (2023-2025-WMPs) docket log at: <https://efiling.energysafety.ca.gov/EFiling/DocketInformation.aspx?docketnumber=2023-2025-WMPs>.

¹¹ Available on the 2023–2025 Wildfire Mitigation Plan (2023-2025-WMPs) docket log at: <https://efiling.energysafety.ca.gov/EFiling/DocketInformation.aspx?docketnumber=2023-2025-WMPs>.

¹² Available on the 2023–2025 Wildfire Mitigation Plan (2023-2025-WMPs) docket log at: <https://efiling.energysafety.ca.gov/EFiling/DocketInformation.aspx?docketnumber=2023-2025-WMPs>.

Energy Safety Approval of 2025 WMP Update

The Pub. Util. Code requires Energy Safety to review, request revision of, and approve or deny a utility's WMP. Energy Safety approved the 2025 WMP Update for PacifiCorp pursuant to Pub. Util. Code Section 8386.3 and submitted it to the Commission for ratification. According to Energy Safety's Decision, attached hereto as Appendix A, Energy Safety reviewed the WMP and considered input from the California Department of Forestry and Fire Protection and stakeholders, responses to data requests, and responses to ongoing reporting required in connection with previous WMP submissions and decisions. Energy Safety also applied a "maturity model" to test whether electrical corporations are improving or "maturing" in their response to catastrophic wildfire over time.

We take official notice that Energy Safety approved PacifiCorp's 2025 WMP Update in its final Decision on PacifiCorp's 2025 WMP Update on April 28, 2025, pursuant to the Commission's Rules of Practice and Procedure 13.10 and California Evidence Code Section 452(c). Parties may address the propriety of taking such notice in comments on this draft Resolution.

DISCUSSION**Ratification**

The Commission has reviewed PacifiCorp's 2025 WMP Update, Energy Safety's evaluation of PacifiCorp's 2025 WMP Update, the Decision issued by Energy Safety pursuant to Pub. Util. Code Section 8386.3, stakeholder comments served on Energy Safety's 2025 WMP Update docket, and other public input. Pursuant to Pub. Util. Code Section 8386.3(a), the Commission ratifies Energy Safety's action approving PacifiCorp's 2025 WMP Update.

While the Commission is ratifying Energy Safety's action approving PacifiCorp's 2025 WMP Update, a Commission decision approving a GRC may authorize a revenue requirement for wildfire risk mitigation programs and activities for a year covered by the WMP that differ from those approved in this WMP. If the wildfire risk mitigation programs and activities in a utility's approved WMP differ from those authorized in a GRC, the utility may need to file with Energy Safety an appropriate request to address differences in the approved WMP and approved GRC.

Wildfire Mitigation Costs

Pursuant to statute, an electrical corporation's costs associated with wildfire mitigation activities are not approved as part of its WMP. The Commission has evaluated or will evaluate 2023–2025 wildfire mitigation costs in PacifiCorp's GRCs or in future applications.

Conclusion

Consistent with Pub. Util. Code Section 8386.3(a), the Commission ratifies Energy Safety's Decision (Appendix A hereto) approving PacifiCorp's 2025 WMP Update.

COMMENTS

Pub. Util. Code Section 311(g)(1) provides that resolutions must be served on all parties to a proceeding and subject to at least 30 days' public review. However, given that this Resolution was issued outside of a formal proceeding, interested stakeholders did not need party status in a Commission proceeding in order to submit comments. Comments were due 20 days from the mailing date of this Resolution. Replies were not accepted.

This Resolution was served on the service list of R.18-10-007 and the parties that submitted comments on the WMP to Energy Safety and placed on the Commission's agenda no earlier than 30 days from its mailing date.

Comments on the draft Resolution were due by June 12, 2025. The Green Power Institute (GPI) submitted comments indicating general support for Energy Safety's decision on PacifiCorp's 2025 WMP Update and the Commission's intent to ratify the action.

FINDINGS AND CONCLUSIONS

1. The Office of Energy Infrastructure Safety reviewed and approved PacifiCorp's 2025 Wildfire Mitigation Plan Update pursuant to Pub. Util. Code Section 8386.3(a) (Appendix A hereto).
2. Pub. Util. Code Section 8386.3(a) provides that "After approval [of the 2025 Wildfire Mitigation Plan by the Office of Energy Infrastructure Safety,] the [C]ommission shall ratify the action of [Energy Safety]."

THEREFORE, IT IS ORDERED THAT:

1. The Office of Energy Infrastructure Safety's Decision approving PacifiCorp's 2025 Wildfire Mitigation Plan Update is ratified.
2. Nothing in this Resolution should be construed as approval of the costs associated with the implementation of PacifiCorp's 2025 Wildfire Mitigation Plan Update.
3. The Commission takes official notice that the Office of Energy Infrastructure Safety approved PacifiCorp's 2025 Wildfire Mitigation Plan Update in its Decision on April 28, 2025, pursuant to the Commission's Rules of Practice and Procedure Rule 13.10 and California Evidence Code Section 452(c).
4. Nothing in this Resolution should be construed as a defense to any enforcement action for a violation of a Commission decision, order, or rule.

This Resolution is effective today.

The foregoing resolution was duly introduced, passed, and adopted at a conference of the Public Utilities Commission of the State of California held on June 26, 2025; the following Commissioners voting favorably thereon:

ALICE REYNOLDS
President

DARCIE L. HOUCK
JOHN REYNOLDS
KAREN DOUGLAS
MATTHEW BAKER

Commissioners

Dated June 26, 2025, at Sacramento, California

APPENDIX A

OFFICE OF ENERGY INFRASTRUCTURE SAFETY DECISION



April 28, 2025

To: Stakeholders for the PacifiCorp 2025 Wildfire Mitigation Plan Update

Enclosed is the Decision of the Office of Energy Infrastructure Safety (Energy Safety), approving the PacifiCorp 2025 Wildfire Mitigation Plan (WMP) Update.

On February 11, 2025, Energy Safety published a draft of this Decision for public review and comment.¹

Opening comments on the draft Decision were due on March 17, 2025, and reply comments were due on March 27, 2025.

Energy Safety considered the comments received in its final evaluation, leading to some changes to the Decision. A summary of these changes can be found in Appendix E. In addition to these changes, Energy Safety made non-substantive changes to correct typographical errors in the text.

If PacifiCorp seeks to change its approved 2025 mitigation initiative targets, it must submit a change order request within 10 business days of Energy Safety's issuance of this Decision for PacifiCorp's 2025 WMP Update. See Section 12 of Energy Safety's 2023-2025 WMP Process and Evaluation Guidelines² for further instructions and criteria for submitting a change order request.

Sincerely,

/s/ Tony Marino

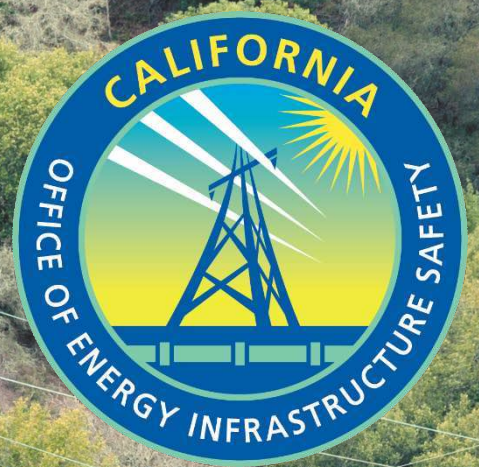
Tony Marino
Deputy Director | Electrical Infrastructure Directorate
Office of Energy Infrastructure Safety

¹ [Draft Decision for PacifiCorp 2025 WMP Update](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57969&shareable=true)

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57969&shareable=true>, accessed Apr. 4, 2025).

² [Energy Safety's 2023-2025 Wildfire Mitigation Plan Process and Evaluation Guidelines \(Revised\) \(adopted Jan. 2024, published Feb. 2024\)](#), Section 12 "Change Order Requests," pp. 22-28

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56255&shareable=true>, accessed May 6, 2024).



OFFICE OF ENERGY INFRASTRUCTURE SAFETY

DECISION

PACIFICORP

2025 WILDFIRE MITIGATION PLAN UPDATE

APRIL 2025

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1. Executive Summary

The Office of Energy Infrastructure Safety (Energy Safety) works to ensure electrical corporations take effective actions to reduce utility-related wildfire risk. This Decision approves PacifiCorp's 2025 Wildfire Mitigation Plan (WMP) Update, resubmitted January 17, 2025, pursuant to a Notice on Errata.

In rendering this Decision Energy Safety incorporated comments from stakeholders and members of the public.

PacifiCorp provided a total of 67 reportable updates in its 2025 WMP Update. These include two updates to risk models; 30 changes to approved targets, objectives, and projected expenditures; 15 quarterly inspection targets for 2025; two new or discontinued programs; and 18 reports of progress on areas for continued improvement.

The above-listed updates encompass seven initiative categories. These include risk methodology and assessment; wildfire mitigation strategy development; grid design, operations, and maintenance; vegetation management and inspections; situational awareness and forecasting; emergency preparedness; and community outreach and engagement.

Energy Safety evaluated PacifiCorp's 2025 WMP Update and finds several strengths. For example, through implementation of its new risk model, PacifiCorp is now able to determine its top ignition-risk circuits and thereby quantify and understand where wildfire risk is highest throughout its system. Further, PacifiCorp's establishment of its High Fire Risk Area (HFRA) expands the area within its service territory that is subject to its wildfire mitigation scrutiny and therefore enables PacifiCorp to better inform its inspections and wildfire mitigation work. Also notable is PacifiCorp's doubling of its resources to support its covered conductor initiative. With these additional resources, PacifiCorp expects to achieve its covered conductor targets in 2024 and 2025.

PacifiCorp also has areas of its WMP that can be further developed and improved. Energy Safety identified 13 areas for continued improvement for which PacifiCorp is required to demonstrate progress in its 2026-2028 Base WMP submittal. These include describing how it plans to quantify and integrate Public Safety Power Shutoff (PSPS) risk into its overall risk assessment, providing a more detailed plan for implementing new procedures for reviewing and validating its wildfire risk models, and demonstrating that its quality assurance quality control (QA/QC) process and pass rate targets drive improvement in the quality of its inspections.

2. Introduction and Background

PacifiCorp submitted its 2023-2025 Wildfire Mitigation Plan (2023-2025 Base WMP) in 2023.¹ Energy Safety approved PacifiCorp's 2023-2025 Base WMP on February 12, 2024. On July 8, 2024, PacifiCorp submitted its 2025 Wildfire Mitigation Plan Update (2025 WMP Update) to its 2023-2025 Base WMP in accordance with Energy Safety's 2025 Wildfire Mitigation Plan Update Guidelines (2025 WMP Update Guidelines)² and Energy Safety's 2023-2025 Wildfire Mitigation Plan Process and Evaluation Guidelines (WMP Process Guidelines).³

On September 6, 2024, Energy Safety issued a Rejection and Order to Resubmit⁴ for PacifiCorp's 2025 WMP Update and received the resubmitted 2025 WMP Update⁵ on September 20, 2024, in accordance with Energy Safety's 2025 WMP Update Guidelines.

On January 10, 2025, Energy Safety issued a Notice on Errata for the PacifiCorp 2025 WMP Update⁶ and received the resubmitted 2025 WMP Update⁷ and revised 2023-2025 Base WMP⁸ on January 17, 2025, in accordance with Energy Safety's 2025 WMP Update Guidelines and the WMP Process Guidelines.

Pursuant to Public Utilities Code section 8386.3(a), this Decision approves PacifiCorp's 2025 WMP Update to its 2023-2025 Base WMP.

¹ In accordance with [Energy Safety's 2023-2025 Wildfire Mitigation Plan Technical Guidelines](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53286&shareable=true), (Dec. 6, 2022) (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53286&shareable=true, accessed Apr. 9, 2024).

² [Energy Safety 2025 Wildfire Mitigation Plan Update Guidelines](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56254&shareable=true) (adopted Jan. 2024, published Feb. 2024) (hereafter 2025 WMP Update Guidelines) (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56254&shareable=true, accessed May 6, 2024).

³ [Energy Safety 2023-2025 Wildfire Mitigation Plan Process and Evaluation Guidelines \(Revised\)](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56255&shareable=true) (adopted Jan. 2024, published Feb. 2024) (hereafter Revised WMP Process Guidelines) (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56255&shareable=true, accessed May 6, 2024).

⁴ [Energy Safety Rejection and Order to Resubmit for PacifiCorp 2025 WMP Update](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57324&shareable=true) (Sep. 20, 2024) (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57324&shareable=true, accessed Oct. 3, 2024).

⁵ [PacifiCorp 2023-2025 Base WMP R5](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57393&shareable=true) (clean) (Sep. 20, 2024) (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57393&shareable=true, accessed Oct. 3, 2024).

⁶ [Energy Safety Notice on Errata for the PacifiCorp 2025 WMP Update](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57806&shareable=true) (Jan. 10, 2025) (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57806&shareable=true, accessed Jan. 15, 2025).

⁷ [PacifiCorp 2025 WMP Update R2](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57821&shareable=true) (clean) (Jan. 17, 2025) (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57821&shareable=true, accessed Jan. 21, 2025).

⁸ [PacifiCorp 2023-2025 Base WMP R6](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57823&shareable=true) (clean) (Jan. 17, 2025) (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57823&shareable=true, accessed Jan. 21, 2025).

2.1 Consultation with California Department of Forestry and Fire Protection

The Office of the State Fire Marshal is part of the California Department of Forestry and Fire Protection (CAL FIRE). Public Utilities Code section 8386.3(a) requires Energy Safety to consult with the Office of the State Fire Marshal in reviewing electrical corporations' WMPs and WMP Updates. The Office of the State Fire Marshal provided consultation and input into Energy Safety's evaluation, but this Decision is an action of Energy Safety and not the Office of the State Fire Marshal or CAL FIRE.

2.2 Stakeholder Comments

Energy Safety invited stakeholders and members of the public to provide comments on the electrical corporations' 2025 WMP Updates and Revision Notices. Opening comments on PacifiCorp's 2025 WMP Update were due on August 12, 2024, and reply comments were due on August 22, 2024.

Energy Safety also accepted stakeholder comments on PacifiCorp's resubmitted 2025 WMP Update. Opening comments were due on the resubmitted 2025 WMP Update on October 2, 2024, and reply comments were due October 7, 2024.

See Appendix D for lists of stakeholders and members of the public who submitted comments.

3. Energy Safety 2025 WMP Update Evaluation Process

Energy Safety issued the following guidelines for electrical corporations' 2025 WMP Updates:

- **2025 Wildfire Mitigation Plan Update Guidelines (January 2024)** (hereafter 2025 WMP Update Guidelines), which sets forth reportable updates and general instructions for each electrical corporation's 2025 WMP Update.
- **2023-2025 Wildfire Mitigation Plan Process and Evaluation Guidelines (Revised January 2024)** (hereafter WMP Process Guidelines), which outlines the process for Energy Safety's evaluation of WMPs, details the public participation process, and establishes submission requirements for the electrical corporations.
- **2023-2025 Electrical Corporation Wildfire Mitigation Maturity Model (Revised January 2024)** and **2023-2025 Electrical Corporation Wildfire Mitigation Maturity Survey (Revised February 2024)** (hereafter Maturity Model and Maturity Survey), which together provide a quantitative method for assessing electrical corporation wildfire risk mitigation capabilities and examining how electrical corporations continue to improve in key areas of their WMPs.^{9, 10}

3.1 Reportable Updates

Energy Safety's 2025 WMP Update Guidelines delineate the following five categories of updates that the electrical corporations are required to report:¹¹

1. Updates to risk models
2. Updates to approved targets, objectives, and projected expenditures¹²
3. Quarterly inspection targets for 2025 for vegetation management and asset inspections

⁹ [Energy Safety's 2023-2025 Electrical Corporation Wildfire Mitigation Maturity Model \(revised and adopted Jan. 2024, published Feb. 2024\) \(hereafter Maturity Model\)](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56256&shareable=true)

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56256&shareable=true>, accessed May 6, 2024).

¹⁰ [Energy Safety's 2023-2025 Electrical Corporation Wildfire Mitigation Maturity Survey \(adopted Jan. 2024, revised and published Feb. 2024\) \(hereafter Maturity Survey\)](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56306&shareable=true)

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56306&shareable=true>, accessed May 6, 2024).

¹¹ [2025 WMP Update Guidelines](#), "Reportable Updates," p. 3

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56254&shareable=true>, accessed May 6, 2024).

¹² Energy Safety's WMP evaluation and decision on a WMP is not an approval of, or agreement with, costs listed in the WMP.

4. New or discontinued programs
5. Progress on areas for continued improvement

The 2025 WMP Update Guidelines direct electrical corporations that they may not include any updates in their 2025 WMP Update that do not fall under one of these categories.¹³

The 2025 WMP Update Guidelines further direct that if an electrical corporation does not have any updates that fall within any of the above categories, it must affirm that it has no reportable updates for 2025 and that the information provided in its 2023-2025 Base WMP is current and accurate.¹⁴

3.2 Maturity Model and Survey

Energy Safety used the Maturity Model¹⁵ and the electrical corporations' 2023 and 2024 responses to the Maturity Survey¹⁶ to assess the maturity of each electrical corporation's wildfire risk mitigation program.¹⁷

The Maturity Model consists of 37 individual capabilities describing the ability of electrical corporations to mitigate wildfire risk and PSPS risk within their service territory.¹⁸ The 37 capabilities are aggregated into 7 categories.¹⁹ Maturity levels range from 0 (below minimum requirements) to 4 (beyond best practice). For each electrical corporation, Energy Safety calculated maturity levels for each capability, each category, five cross-category themes, and

¹³ [2025 WMP Update Guidelines](#), p. 3
(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56254&shareable=true>, accessed Mar. 29, 2024).

¹⁴ [2025 WMP Update Guidelines](#), p. 3
(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56254&shareable=true>, accessed Mar. 29, 2024).

¹⁵ [Maturity Model](#) (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56256&shareable=true>, accessed May 6, 2024).

¹⁶ [Maturity Survey](#) (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56306&shareable=true>, accessed May 6, 2024).

¹⁷ Energy Safety revised the 2023-2025 Electrical Corporation Wildfire Mitigation Maturity Model and Maturity Survey in January 2024. The revisions did not result in any changes to Maturity Survey questions, therefore the responses from 2024 are directly comparable to the responses from 2023. See the Maturity Survey issued by Energy Safety to the electrical corporations in 2023: [Revised Final 2023 Electrical Corporation Wildfire Mitigation Maturity Survey \(Apr. 24, 2023\)](#)
(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53708&shareable=true>, accessed May 6, 2024).

¹⁸ [Maturity Model](#), Section 1, "Introduction," p. 1
(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56256&shareable=true>, accessed Apr. 9, 2024).

¹⁹ [Maturity Model](#), Section 3.1, "Capabilities and Categories," pp. 7-8
(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56256&shareable=true>, accessed Apr. 9, 2024).

the overall WMP, based on the electrical corporation's answers to Maturity Survey questions and the scoring system described in the Maturity Model.²⁰

Appendix F summarizes PacifiCorp's 2024 Maturity Survey results and changes in PacifiCorp's maturity compared to its 2023 Maturity Survey results.

3.3 Areas for Continued Improvement

Energy Safety's Decisions on the 2023-2025 Base WMPs focused on each electrical corporation's strategies for reducing the risk of utility-related ignitions. In those Decisions, Energy Safety identified areas where the electrical corporation must continue to improve its wildfire mitigation capabilities in future plans. For some areas, the electrical corporation was required to report its progress in its 2025 WMP Update. Energy Safety discusses the results of its evaluation of the electrical corporation's progress in each of those areas in Sections 5 through 9 of this Decision.

3.4 Errata

PacifiCorp submitted a revised 2023-2025 Base WMP incorporating non-substantive self-identified errata on August 19, 2024.²¹

Energy Safety issued PacifiCorp a Reject and Order to Resubmit on September 6, 2024,²² requesting that PacifiCorp submit a new version of its 2025 WMP Update and a revised 2023-2025 Base WMP incorporating corrections to non-substantive and substantive errata identified by Energy Safety. In response, PacifiCorp submitted corrected versions of its 2025 WMP Update and revised 2023-2025 Base WMP on September 20, 2024.^{23, 24} The corrected versions fixed errors in PacifiCorp's reportable updates regarding its objectives and discontinued programs.²⁵

²⁰ [Maturity Model](#), Section 4, "Maturity Level Determination," pp. 39-42 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56256&shareable=true, accessed Apr. 9, 2024).

²¹ [PacifiCorp 2023-2025 Base WMP Non-substantive errata \(redlined, Aug. 19, 2024\)](#) (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57218&shareable=true, accessed Oct. 4, 2024).

²² [Energy Safety Rejection and Order to Resubmit for PacifiCorp 2025 WMP Update](#) (Sep. 6, 2024) (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57324&shareable=true, accessed Nov. 18, 2024).

²³ [PacifiCorp 2025 WMP Update R1](#) (clean) (Sep. 20, 2024), (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57395&shareable=true, accessed Nov. 17, 2024).

²⁴ [PacifiCorp 2023-2025 Base WMP R5](#) (clean) (Sep. 20, 2024), (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57393&shareable=true, accessed Nov. 17, 2024).

²⁵ [Energy Safety Rejection and Order to Resubmit for PacifiCorp 2025 WMP Update](#) (Sep. 20, 2024) (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57324&shareable=true, accessed Nov. 13, 2024).

Energy Safety issued a Notice on Errata for PacifiCorp’s 2025 Wildfire Mitigation Plan Update on January 10, 2025,²⁶ requesting that PacifiCorp further incorporate corrections to non-substantive and substantive errata. In response, PacifiCorp submitted corrected versions of its 2025 WMP Update²⁷ and revised 2023-2025 Base WMP²⁸ on January 17, 2025.

Energy Safety considered PacifiCorp’s corrected versions of its 2025 WMP Update and revised 2023-2025 Base WMP in its evaluation.

3.5 Revision Notice

Public Utilities Code section 8386.3(a) states, “Before approval, [Energy Safety] may require modifications of the [WMP].” If Energy Safety requires modifications to a WMP, it does so by issuing a Revision Notice to an electrical corporation.²⁹

Energy Safety did not issue PacifiCorp a Revision Notice for its 2025 WMP Update.

3.6 Decision

In its evaluation of an electrical corporation’s 2025 WMP Update, Energy Safety considers the information provided by the electrical corporation regarding its reportable updates and the associated justifications. Energy Safety’s approval of a 2025 WMP Update constitutes collective approval of the reported items in the electrical corporation’s 2025 WMP Update. The approval therefore authorizes the updates to the electrical corporation’s 2023-2025 Base WMP, as shown in the “Redlined 2023-2025 Base WMP” and “Clean Updated 2023-2025 Base WMP” provided as part of the electrical corporation’s 2025 WMP Update submission.³⁰

PacifiCorp’s reported updates reduce risk, increase efficiencies, increase its available resources for wildfire mitigation work, and improve its risk assessment capabilities. Therefore, Energy Safety approves PacifiCorp’s 2025 WMP Update.

Energy Safety invited stakeholders and members of the public to provide comments on Energy Safety’s draft Decision for PacifiCorp’s 2025 WMP Update (published for comment on

²⁶ [Energy Safety Notice on Errata for the PacifiCorp 2025 WMP Update](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57806&shareable=true) (Jan. 10, 2025) (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57806&shareable=true, accessed Jan. 15, 2025).

²⁷ [PacifiCorp 2025 WMP Update R2](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57821&shareable=true) (clean) (Jan. 17, 2025) (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57821&shareable=true, accessed Jan. 21, 2025).

²⁸ [PacifiCorp 2023-2025 Base WMP R6](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57823&shareable=true) (clean) (Jan. 17, 2025) (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57823&shareable=true, accessed Jan. 21, 2025).

²⁹ [Revised WMP Process Guidelines](#), Section 4.4, “Revision Notice,” pp. 6-8 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56255&shareable=true, accessed May 6, 2024).

³⁰ [2025 WMP Update Guidelines](#), pp. 3-4 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56254&shareable=true, accessed Mar. 29, 2024).

February 11, 2025). One stakeholder provided comments, as noted in Appendix E. Energy Safety considered all comments prior to issuing its Decision.

4. PacifiCorp 2025 WMP Update

In accordance with the 2025 WMP Update Guidelines,³¹ PacifiCorp provided the following for its 2025 WMP Update submission:

1. **2025 WMP Update:** A standalone 2025 WMP Update document that describes PacifiCorp's reportable updates, or confirmation of no updates to the approved 2023-2025 Base WMP.
2. **Redlined 2023-2025 Base WMP:** A redlined version of PacifiCorp's 2023-2025 Base WMP showing reportable updates to the approved 2023-2025 Base WMP.
3. **Clean Updated 2023-2025 Base WMP:** A clean, updated copy of PacifiCorp's 2023-2025 Base WMP (i.e., without any updates marked in redline) incorporating the reportable updates from PacifiCorp's 2025 WMP Update as demonstrated in the redlined version.

Specifically, in response to the five categories of reportable updates of the 2025 WMP Update Guidelines, PacifiCorp provided the required information for each category. Energy Safety discusses each reportable update under the relevant mitigation initiative in Sections 5 through 9 of this Decision.

³¹ [2025 WMP Update Guidelines](#), pp. 3-4

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56254&shareable=true>, accessed May 6, 2024).

5. Overview of the Service Territory

In its 2025 WMP Update, PacifiCorp provided one update related to the overview of the service territory section of its 2023-2025 Base WMP. Related to this section, PacifiCorp reported impacts resulting from its risk model updates.

5.1 2023 Areas for Continued Improvement

Energy Safety's Decision on PacifiCorp's 2023-2025 Base WMP³² did not require PacifiCorp to report progress on any areas for continued improvement in the overview of the service territory section in its 2025 WMP Update. Therefore, PacifiCorp has no reportable updates in this area.

5.2 New or Discontinued Programs

In its 2025 WMP Update, PacifiCorp did not report any new or discontinued programs related to the overview of the service territory section of its 2023-2025 Base WMP.

5.3 Targets, Objectives, and Projected Expenditures

In its 2025 WMP Update, PacifiCorp did not report any updates to approved targets, objectives, or projected expenditures related to the overview of the service territory section of its 2023-2025 Base WMP.

5.4 Other Resulting Impacts

5.4.1 Impacts from Risk Model Updates

PacifiCorp updated its social vulnerability index map (Figure 5-20) to include its newly defined HFRA.³³ Energy Safety finds that this update is consistent with the 2025 WMP Update Guidelines. See section 6.1 of this Decision for more information regarding PacifiCorp's newly defined HFRA.

³² [Decision on PacifiCorp 2023-2025 Base WMP](https://efiling.energy.ca.gov/eFiling/Getfile.aspx?fileid=56309&shareable=true) (Feb. 12, 2024), pp. 80-91 (https://efiling.energy.ca.gov/eFiling/Getfile.aspx?fileid=56309&shareable=true, accessed Oct. 16, 2024).

³³ [PacifiCorp 2023-2025 Base WMP R6](https://efiling.energy.ca.gov/eFiling/Getfile.aspx?fileid=57823&shareable=true) (clean) (Jan. 17, 2025), p. 58-59, 99 (https://efiling.energy.ca.gov/eFiling/Getfile.aspx?fileid=57823&shareable=true, accessed Jan 21, 2025).

6. Risk Methodology and Assessment

In its 2025 WMP Update, PacifiCorp reported significant risk model updates, as discussed below.³⁴

6.1 Risk Model Updates

PacifiCorp reported the following significant risk model updates:

- Implementation of a new risk model for determining ignition risk scores for overhead assets. The new risk model identifies risk by breaking it down into fuel-and-terrain-driven ignition risk, wind-driven ignition risk, and associated consequence risk.
- Introduction of 24-hour consequence modeling as an additional data type within its risk model, which allows the model to predict potential consequences during a 24-hour burn period in addition to the previously modeled 8-hour burn period.
- Establishment of its HFRA, which consists of 728 additional overhead line miles identified as having high fire risk outside of the High Fire Threat District (HFTD). Its HFRA included areas within the 85th to 100th percentile of highest wildfire risk based on PacifiCorp's newest risk model output.³⁵

Energy Safety finds that these updates meet the reportable update criteria set forth in the 2025 WMP Update Guidelines.³⁶

6.1.1 Energy Safety Evaluation

As a result of these significant risk model updates, PacifiCorp's wildfire mitigation prioritization has changed. Previously, PacifiCorp could not include a list of its top risk circuits in its 2023-2025 Base WMP as it was unable to calculate the highest risk circuits with its existing risk analysis tools. In its 2025 WMP Update, through the implementation of its new

³⁴ [2025 WMP Update Guidelines](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56254&shareable=true), Section 1, "Updates to Risk Models," p. 6 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56254&shareable=true, accessed May 6, 2024).

³⁵ "Wildfire risk" in this case meaning wind-driven or fuel/terrain-driven risk, which PacifiCorp uses to identify its areas of wildfire risk; [PacifiCorp 2025 WMP Update R2](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57821&shareable=true) (clean) (Jan. 17, 2025), p. 9 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57821&shareable=true, accessed Jan. 21, 2025).

³⁶ [2025 WMP Update Guidelines](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56254&shareable=true), "Reportable Updates," p. 3 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56254&shareable=true, accessed May 6, 2024).

risk model, PacifiCorp identified the 14 circuits that make up the top 5 percent of total ignition risk, based on circuit-mile-weighted ignition risk scores.³⁷

PacifiCorp's incorporation of a 24-hour burn model is also an improvement given that it increases PacifiCorp's understanding of wildfire risk by expanding upon modeling capabilities for longer burn periods. By previously only modeling for 8-hour burn periods, PacifiCorp may have been missing an understanding of risk more indicative of real-world situations where wildfires can still reach catastrophic levels of consequence past initial eight hour burn periods.

PacifiCorp's inclusion of its newly established HFRA based on its new risk model output greatly expands the area within its service territory that is subject to additional wildfire mitigation scrutiny. Previously, PacifiCorp had 1,092 miles within the HFTD and has now identified 1,763 miles within the HFTD and HFRA combined, the combined miles representing a 64 percent increase over the HFTD alone. PacifiCorp is using knowledge of its newly defined HFRA to inform additional asset and vegetation inspections,³⁸ thereby potentially reducing risk by inspecting more high-risk areas with additional scrutiny.

Energy Safety finds that PacifiCorp's new risk model is an improvement, allowing PacifiCorp to quantify where wildfire risk is highest throughout its system. However, PacifiCorp must continue to improve upon its risk modeling, including working to have its HFRA properly recognized by the CPUC, implementing PSPS risk analysis, and undergoing third-party validation, as described in Sections 6.1.2.1, 6.2.2, and 6.2.3.

6.1.2 Areas for Continued Improvement

PacifiCorp must continue to improve in the following areas and report its progress in its 2026-2028 Base WMP. Additionally, in its 2026-2028 Base WMP, PacifiCorp must report its progress on any existing areas for continued improvements specified in Energy Safety's Decision on PacifiCorp's 2023-2025 Base WMP.³⁹

6.1.2.1 Proposed Changes to the HFTD

PacifiCorp's inclusion of its newly established HFRA based on its new risk model output greatly expands the area within its service territory that is subject to additional wildfire mitigation scrutiny. Previously, PacifiCorp had 1,092 miles within the HFTD and has now

³⁷ [PacifiCorp 2025 WMP Update R2](#) (clean) (Jan. 17, 2025), Table 1-1 Summary of Top Ignition Risk Circuits, Segment, or Spans, pp. 11-12 (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57821&shareable=true>, accessed Jan. 21, 2025).

³⁸ [PacifiCorp 2025 WMP Update R2](#) (clean) (Jan. 17, 2025), p. 14 (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57821&shareable=true>, accessed Jan. 21, 2025).

³⁹ [Decision on PacifiCorp 2023-2025 Base WMP](#) (Feb. 12, 2024), pp. 80-82 (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56309&shareable=true>, accessed Dec. 17, 2024).

identified 1,763 miles within the HFTD and HFRA combined, the combined miles representing a 64 percent increase over the HFTD alone. PacifiCorp is using knowledge of its newly defined HFRA to inform additional asset and vegetation inspections,⁴⁰ thereby potentially reducing risk by inspecting more high-risk areas with additional scrutiny.

Energy Safety requires an electrical corporation to identify its HFRA as top risk areas within its service territory, compare these areas to CPUC's current HFTD, and discuss its plan to submit proposed changes of the HFTD to the CPUC for review.⁴¹

PacifiCorp finds that its newly defined HFRA presents increased wildfire risk and is prioritizing these areas for mitigation efforts. However, PacifiCorp indicated that it does not currently plan to submit proposed changes to the HFTD to the CPUC for review based on its newly defined HFRA.⁴² PacifiCorp did not provide a plan or process for how it would submit proposed changes of the HFTD to the CPUC, including how its HFRA compares to the HFTD, although PacifiCorp is proposing that an additional 728 overhead line miles be recognized within its HFRA on top of the current CPUC's HFTD.

Having an HFRA that is not defined by HFTD tiers under CPUC rulemaking R.15-05-006 leads to "disjointed, self-imposed, unreviewed, and unclear definition of fire risk area" and "unnecessarily complicates enforcement of fire safety regulations" for the CPUC.⁴³ Similar to the outcomes from the Southern California Edison (SCE) in Energy Safety's 2019 WMP evaluation and Pacific Gas and Electric Company (PG&E) in Energy Safety's 2021 WMP evaluation, PacifiCorp must provide a process outlining how it compares areas in its HFRA to the current HFTD, and provide its plan for submitting proposed changes for any identified high-risk areas to the HFTD to the CPUC.⁴⁴ Energy Safety recognizes that the process for petitions to modify the HFTD with the CPUC is not yet defined.⁴⁵ However, PacifiCorp must

⁴⁰ [PacifiCorp 2025 WMP Update R2](#) (clean) (Jan. 17, 2025), p. 14 (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57821&shareable=true>, accessed Jan. 21, 2025).

⁴¹ [Energy Safety's 2023-2025 Wildfire Mitigation Plan Technical Guidelines](#), (Dec. 6, 2022), Section 6.4.1, p. 50 (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53286&shareable=true>, accessed Jan. 8, 2025).

⁴² [PacifiCorp 2023-2025 Base WMP R6](#) (clean) (Jan. 17, 2025), p. 102 (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57823&shareable=true>, accessed Jan. 21, 2025).

⁴³ Rulemaking 18-10-007, Decision on Southern California Edison Company's 2019 Wildfire Mitigation Plan Pursuant to Senate Bill 901, p. 7.

⁴⁴ In SCE's 2019 WMP review process, it was ordered to submit a "process for bringing its 'High Fire Risk Areas' into conformity with the Commission's High Fire-Threat District area maps or discuss in more detail why it should not be required to do so." (D.19-05-038, p. 53) As a result, in August 2019 SCE submitted a petition to modify D.17-12-024 to recognize SCE-identified HFRA as HFTD Tier 2 areas.

⁴⁵ Per D.25-01-037: "[the] Commission intends to initiate a new rulemaking to consider modifications to the High Fire-Threat District boundaries."

still outline its plan to begin its process of communicating with the CPUC about its proposed changes to the HFTD.

Section 11 provides all areas for continued improvement for PacifiCorp, including the specific required progress that PacifiCorp must address in its 2026-2028 Base WMP.

6.2 2023 Areas for Continued Improvement

PacifiCorp reported its progress on five areas for continued improvement in the risk methodology and assessment section in its 2025 WMP Update.

6.2.1 PC-23B-01.⁴⁶ Cross-Utility Collaboration on Risk Model Development

In its Decision on PacifiCorp's 2023-2025 Base WMP, Energy Safety found that PacifiCorp and other investor-owned utilities (IOUs)⁴⁷ must continue participating in the Energy Safety-led risk modeling working group, as established by the 2021 WMP Action Statements.⁴⁸

In response, PacifiCorp discussed its continued participation in the risk modeling working group meetings and noted that it has found its participation to be beneficial as the meetings provide additional perspectives from other experts on risk modeling.⁴⁹

6.2.1.1 Energy Safety Evaluation

PacifiCorp sufficiently responded to this area for continued improvement; no further reporting is required on this area for continued improvement in PacifiCorp's 2026-2028 Base WMP.

⁴⁶ Energy Safety is instituting a new naming convention for its areas for continued improvement. Moving forward, areas for continued improvement identified in Energy Safety's evaluation of Base WMPs will be designated with a "B" and areas for continued improvement identified in Energy Safety's evaluation of WMP Updates will be designated with a "U." Accordingly, areas for continued improvement that were identified in Energy Safety's evaluation of 2023-2025 Base WMPs are retitled "23B" and new areas for continued improvement identified in Energy Safety's evaluation of 2025 Update WMPs herein are titled "25U."

⁴⁷ The IOUs include Pacific Gas and Electric Company (PG&E), Southern California Edison Company (SCE), San Diego Gas and Electric Company (SDG&E), Bear Valley Electric Service (BVES), Liberty Utilities (Liberty), and PacifiCorp.

⁴⁸ [Revised Final Action Statement on PacifiCorp 2021 WMP Update](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=51672&shareable=true) (Jul. 20, 2021), p. 30 (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=51672&shareable=true>, accessed Nov. 10, 2024).

⁴⁹ [PacifiCorp 2025 WMP Update R2](#) (clean) (Jan. 17, 2025), pp. 26-27 (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57821&shareable=true>, accessed Jan. 21, 2025).

6.2.2 PC-23B-02. Calculating Risk Scores Using 95th Percentile Values

In its Decision on PacifiCorp's 2023-2025 Base WMP, Energy Safety found that PacifiCorp's methodology using 95th percentile values for calculating risk scores, as opposed to probability distributions, leads to sub-optimal prioritization by aggregating extreme risk scores.⁵⁰ As a result, Energy Safety required PacifiCorp to either provide a plan in its 2025 WMP Update with milestones for transitioning from 95th percentile values to probability distributions, or an explanation with an alternative strategy as to why PacifiCorp is unable to transition to using probability distributions.⁵¹

In response, PacifiCorp provided a brief statement that it is working with its risk model vendor to develop a plan and timeline to transition from 95th percentile values to probability distributions.⁵² PacifiCorp stated that it will provide a plan and timeline in its 2026-2028 Base WMP.⁵³

6.2.2.1 Energy Safety Evaluation

PacifiCorp did not provide a plan to transition to using probability distributions or an alternative strategy in its 2025 WMP Update, as required. However, given that PacifiCorp has undertaken many risk modeling improvements since its 2023-2025 Base WMP, Energy Safety finds that PacifiCorp continues to demonstrate forward-looking growth despite not yet fully developing its plan to transition to probability distributions. PacifiCorp must continue to improve in this area and report how it has made additional progress in its 2026-2028 Base WMP.

Section 11 provides all areas for continued improvement for PacifiCorp, including the specific required progress that PacifiCorp must address in its 2026-2028 Base WMP.

6.2.3 PC-23B-03. PSPS and Wildfire Risk Trade-Off Transparency

In its Decision on PacifiCorp's 2023-2025 Base WMP, Energy Safety found that PacifiCorp did not provide adequate transparency of its analysis of trade-offs between PSPS risk and wildfire

⁵⁰ [Decision on PacifiCorp's 2023-2025 Base WMP](https://efiling.energy.ca.gov/eFiling/Getfile.aspx?fileid=56309&shareable=true) (Feb. 12, 2024), pp. 80-81 (https://efiling.energy.ca.gov/eFiling/Getfile.aspx?fileid=56309&shareable=true, accessed Nov. 7, 2024).

⁵¹ [Decision on PacifiCorp's 2023-2025 Base WMP](https://efiling.energy.ca.gov/eFiling/Getfile.aspx?fileid=56309&shareable=true) (Feb. 12, 2024), pp. 80-81 (https://efiling.energy.ca.gov/eFiling/Getfile.aspx?fileid=56309&shareable=true, accessed Nov. 7, 2024).

⁵² [PacifiCorp 2025 WMP Update R2](https://efiling.energy.ca.gov/eFiling/Getfile.aspx?fileid=57821&shareable=true) (clean) (Jan. 17, 2025), p. 28 (https://efiling.energy.ca.gov/eFiling/Getfile.aspx?fileid=57821&shareable=true, accessed Jan. 21, 2025).

⁵³ [PacifiCorp Response to Data Request OEIS-P-WMP 2024-PC-06](https://efiling.energy.ca.gov/eFiling/Getfile.aspx?fileid=57483&shareable=true), Question 4 (https://efiling.energy.ca.gov/eFiling/Getfile.aspx?fileid=57483&shareable=true, accessed Nov. 10, 2024).

risk.⁵⁴ As a result, Energy Safety required PacifiCorp to provide information in its 2025 WMP Update on how it prioritizes PSPS risk compared to wildfire risk.

Energy Safety also required PacifiCorp to compare the rank order of its planned mitigation initiatives, including the influence from PSPS risk, to initiatives ranked by risk buy-down.⁵⁵

In response, PacifiCorp stated that it will use the following three processes to evaluate PSPS risk that will inform prioritization of mitigation initiatives.⁵⁶

1. Developing a PSPS risk assessment solution to quantify PSPS risk, which it is unable to do currently;⁵⁷
2. Using PSPS risk as an input into its annual mitigation selection planning process; and
3. Considering PSPS risk as part of its risk spend efficiency (RSE) calculations.⁵⁸

Once these processes are implemented, PacifiCorp states that it will be able to quantify PSPS risk values and will use those risk values to consider PSPS risk in its decision making on where to prioritize initiative activities and which initiative activities to select at those locations.⁵⁹ PacifiCorp plans to have these processes in place by its 2026-2028 Base WMP submission.⁶⁰

6.2.3.1 Energy Safety Evaluation

Currently, PacifiCorp does not have a PSPS risk model to quantify PSPS risk. Therefore, PacifiCorp is unable to determine how PSPS risk impacts its risk rankings and associated prioritizations. While working to develop a PSPS risk model, PacifiCorp states that it is developing and implementing a PSPS risk assessment solution to meet the requirements of PC-23B-03, including developing a plan to implement the three processes listed above.⁶¹

⁵⁴ [Decision on PacifiCorp 2023-2025 Base WMP](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56309&shareable=true) (Feb. 12, 2024), pp. 27-28 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56309&shareable=true, accessed Dec. 17, 2024).

⁵⁵ [Decision on PacifiCorp 2023-2025 Base WMP](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56309&shareable=true) (Feb. 12, 2024), p. 81 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56309&shareable=true, accessed Dec. 17, 2024).

⁵⁶ [PacifiCorp 2025 WMP Update R2](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57821&shareable=true) (clean) (Jan. 17, 2025), p. 28 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57821&shareable=true, accessed Jan. 21, 2025).

⁵⁷ [PacifiCorp 2025 WMP Update R2](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57821&shareable=true) (clean) (Jan. 17, 2025), p. 12 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57821&shareable=true, accessed Jan. 21, 2025).

⁵⁸ [PacifiCorp 2025 WMP Update R2](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57821&shareable=true) (clean) (Jan. 17, 2025), p. 29 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57821&shareable=true, accessed Jan. 21, 2025).

⁵⁹ [PacifiCorp 2025 WMP Update R2](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57821&shareable=true) (clean) (Jan. 17, 2025), p. 28 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57821&shareable=true, accessed Jan. 21, 2025).

⁶⁰ [PacifiCorp 2025 WMP Update R2](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57821&shareable=true) (clean) (Jan. 17, 2025), p. 28 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57821&shareable=true, accessed Jan. 21, 2025).

⁶¹ [PacifiCorp 2025 WMP Update R2](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57821&shareable=true) (clean) (Jan. 17, 2025), pp. 11-12 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57821&shareable=true, accessed Jan. 21, 2025).

PacifiCorp must provide more information on how it plans to quantify and integrate PSPS risk into its system-wide risk assessment. Once PacifiCorp can quantify PSPS risk, it must provide an analysis on how PSPS risk impacts its overall risk ranking and prioritization of initiative activities, including where and which initiative activities to prioritize.

Energy Safety has modified the area for continued improvement to provide additional guidance for PacifiCorp. PacifiCorp must respond to this revised area for continued improvement in its 2026-2028 Base WMP.

Section 11 provides all areas for continued improvement for PacifiCorp, including the specific required progress that PacifiCorp must address in its 2026-2028 Base WMP.

6.2.4 PC-23B-04. Collaboration Between Vendor and Utility Risk Teams

In its Decision on PacifiCorp's 2023-2025 Base WMP, Energy Safety found that PacifiCorp did not properly demonstrate how its internal team and risk model vendor share risk modeling and mitigation related duties.⁶² As a result, Energy Safety required PacifiCorp, in its 2025 WMP Update, to:

1. Demonstrate how it differentiates activities completed by internal staff versus vendor staff;⁶³
2. Demonstrate how it identifies activities that require vendor discretion and whether PacifiCorp provides final approval;⁶⁴ and
3. Indicate its data sources, and whether the data is generated internally or by a vendor.⁶⁵

In its 2025 WMP Update, PacifiCorp:

1. Detailed its delineation of work between internal staff and vendor staff and described that its third-party vendor calculates values for model attributes, while PacifiCorp

⁶² [Decision on PacifiCorp 2023-2025 Base WMP](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56309&shareable=true) (Feb. 12, 2024), p. 28 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56309&shareable=true, accessed Dec. 17, 2024).

⁶³ [Decision on PacifiCorp 2023-2025 Base WMP](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56309&shareable=true) (Feb. 12, 2024), p. 81 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56309&shareable=true, accessed Dec. 17, 2024).

⁶⁴ [Decision on PacifiCorp 2023-2025 Base WMP](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56309&shareable=true) (Feb. 12, 2024), p. 82 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56309&shareable=true, accessed Dec. 17, 2024).

⁶⁵ [Decision on PacifiCorp 2023-2025 Base WMP](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56309&shareable=true) (Feb. 12, 2024), p. 82 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56309&shareable=true, accessed Dec. 17, 2024).

internally selects which attributes, percentiles, and weightings are used for determining risk calculations, and performs the composite risk calculations;⁶⁶

2. Showed how it differentiates activities completed by internal staff versus vendor staff by including a schematic demonstrating the various percentiles and weightings PacifiCorp has chosen for various attributes under the fuel and terrain risk, wind risk, and consequence risk; and
3. Modified its 2023-2025 Base WMP to better clarify when it generates its data sources as opposed to relying on the vendor.⁶⁷

6.2.4.1 Energy Safety Evaluation

As required in the 2023 Decision, PacifiCorp delineated where it uses vendor input versus internal staff input for its risk modeling data and analysis, including a breakdown of the various attributes PacifiCorp has selected. By providing a description and schematic, PacifiCorp showed that it ultimately determines the weightings for model attributes and performs the composite risk calculations. Lastly, PacifiCorp provided its data sources to verify the information listed above, where applicable. By providing the required information, PacifiCorp sufficiently responded to this area for continued improvement; no further reporting is required on this area for continued improvement in PacifiCorp's 2026-2028 Base WMP.

6.2.5 PC-23B-05. Independent Review Plan Transparency

In its Decision on PacifiCorp's 2023-2025 Base WMP, Energy Safety found that PacifiCorp's risk models are not independently reviewed.⁶⁸ As a result, Energy Safety required PacifiCorp to provide a plan in its 2025 WMP Update with specific, actionable tasks to meet independent review requirements by its 2026-2028 Base WMP submission.⁶⁹ Energy Safety required that this plan include a chronological list of tasks with expected completion dates, potential complicating factors that may arise and how those factors will be addressed, and procedures

⁶⁶ [PacifiCorp 2025 WMP Update R2](https://efiling.energy.ca.gov/eFiling/Getfile.aspx?fileid=57821&shareable=true) (clean) (Jan. 17, 2025), p. 29 (https://efiling.energy.ca.gov/eFiling/Getfile.aspx?fileid=57821&shareable=true, accessed Jan. 21, 2025).

⁶⁷ [PacifiCorp 2025 WMP Update R2](https://efiling.energy.ca.gov/eFiling/Getfile.aspx?fileid=57821&shareable=true) (clean) (Jan. 17, 2025), Figure 5: Attributes, Percentiles and Weightings Selected for Risk Calculations, p. 30 (https://efiling.energy.ca.gov/eFiling/Getfile.aspx?fileid=57821&shareable=true, accessed Jan. 21, 2025).

⁶⁸ [Decision on PacifiCorp 2023-2025 Base WMP](https://efiling.energy.ca.gov/eFiling/Getfile.aspx?fileid=56309&shareable=true) (Feb. 12, 2024), p. 29 (https://efiling.energy.ca.gov/eFiling/Getfile.aspx?fileid=56309&shareable=true, accessed Dec. 17, 2024).

⁶⁹ [Decision on PacifiCorp 2023-2025 Base WMP](https://efiling.energy.ca.gov/eFiling/Getfile.aspx?fileid=56309&shareable=true) (Feb. 12, 2024), p. 82 (https://efiling.energy.ca.gov/eFiling/Getfile.aspx?fileid=56309&shareable=true, accessed Dec. 17, 2024).

for PacifiCorp to oversee activities including independent review, additional review triggers, and a routine review schedule.⁷⁰

In response, PacifiCorp stated that it has started two internal projects to meet these requirements, including developing policy and procedures for review of internal planning models and having a third-party perform an independent review of its planning risk models.⁷¹ PacifiCorp provided high level timeframes and key milestones for both projects.

6.2.5.1 Energy Safety Evaluation

PacifiCorp's two internal projects began to address Energy Safety's concern that PacifiCorp does not independently review its risk models. However, while PacifiCorp included brief descriptions, high-level timeframes, and key milestones of these two internal projects, PacifiCorp failed to include an analysis of potential complicating factors and failed to include specific tasks and dates relating to the implementation of these projects.

Given the timeframe and milestones provided, PacifiCorp will likely complete its two internal projects before it submits its 2026-2028 Base WMP. Therefore, in its 2026-2028 Base WMP, PacifiCorp must demonstrate that it is implementing its policy and procedures for review of internal planning models. This includes having a third-party perform an independent review to ensure that PacifiCorp's risk model is providing valid and accurate assessments of wildfire risk.

Energy Safety has modified the area for continued improvement to provide additional guidance for PacifiCorp. PacifiCorp must respond to this revised area for continued improvement in its 2026-2028 Base WMP.

Section 11 provides all areas for continued improvement for PacifiCorp, including the specific required progress that PacifiCorp must address in its 2026-2028 Base WMP.

⁷⁰ [Decision on PacifiCorp 2023-2025 Base WMP](https://efiling.energy.ca.gov/eFiling/Getfile.aspx?fileid=56309&shareable=true) (Feb. 12, 2024), p. 82 (https://efiling.energy.ca.gov/eFiling/Getfile.aspx?fileid=56309&shareable=true, accessed Dec. 17, 2024).

⁷¹ [PacifiCorp 2025 WMP Update R2](https://efiling.energy.ca.gov/eFiling/Getfile.aspx?fileid=57821&shareable=true) (clean) (Jan. 17, 2025), pp. 30-31 (https://efiling.energy.ca.gov/eFiling/Getfile.aspx?fileid=57821&shareable=true, accessed Jan. 21, 2025).

7. Wildfire Mitigation Strategy Development

In its 2025 WMP Update, PacifiCorp provided four total updates related to the wildfire mitigation strategy development section of its 2023-2025 Base WMP. The updates PacifiCorp provided related to this section included reporting required progress on two areas for continued improvement and two projected expenditures.

7.1 2023 Areas for Continued Improvement

PacifiCorp reported its progress on two areas for continued improvement in the wildfire mitigation strategy development section in its 2025 WMP Update.

7.1.1 PC-23B-06. Vendor Fire Risk Model Implementation Milestones and Dates

In its Decision on PacifiCorp's 2023-2025 Base WMP, Energy Safety found that PacifiCorp did not provide a clearly defined schedule for implementing its new risk modeling platform.⁷² As a result, Energy Safety required PacifiCorp, in its 2025 WMP Update, to provide a description of how PacifiCorp is using its new vendor risk modeling software to improve its operation and/or planning risk analysis, including a plan with milestones and dates for achieving those improvements.⁷³

In its 2025 WMP Update, PacifiCorp stated that it implemented the Wildfire Analyst-Enterprise (WFA-E) model in 2022.⁷⁴ PacifiCorp also discussed transitioning to a vendor risk planning model that it implemented in 2023. PacifiCorp used the data gathered from that planning model to define its HFRA as well as to inform its prioritization of grid planning and mitigation

⁷² [Decision on PacifiCorp 2023-2025 Base WMP](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56309&shareable=true) (Feb. 12, 2024), p. 31 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56309&shareable=true, accessed Oct. 16, 2024).

⁷³ [Decision on PacifiCorp 2023-2025 Base WMP](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56309&shareable=true) (Feb. 12, 2024), pp. 82-83 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56309&shareable=true, accessed Oct. 16, 2024).

⁷⁴ [PacifiCorp 2025 WMP Update R2](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57821&shareable=true) (clean) (Jan. 17, 2025), pp. 31-32 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57821&shareable=true, accessed Jan. 21, 2025).

initiatives.⁷⁵ PacifiCorp expects to continue to evolve its risk assessment process and models as it increases usage of its newly adopted WFA-E model.⁷⁶

In its revised 2023-2025 Base WMP, PacifiCorp further described its implementation of the WFA-E model and other vendor model, including the milestones and dates for the parts of the model already implemented and the expected milestones and dates for the parts of the model it will implement.⁷⁷ PacifiCorp provided a timeline and milestones for its risk assessment improvement plan in Table 6-7.⁷⁸ The timeline includes various steps to improve its risk modeling, such as steps to improve data analysis, storage, and collection; and steps to implement an annual review of its risk model and its mitigation selection planning process.⁷⁹ These steps span from 2023 to 2026 and include the quarterly steps.⁸⁰

7.1.1.1 Energy Safety Evaluation

While PacifiCorp provided a high-level summary of its various workstreams and associated dates related to risk modeling, PacifiCorp must provide a more organized and specific list of steps related to the implementation of its WFA-E risk model. While Table 6-7 is a first step, it also appears to include information that is not relevant to PacifiCorp's risk modeling implementation. For example, Table 6-7 includes potentially less relevant categories such as PSPS and Design, in addition to relevant categories such as Risk Event Tracking and Risk Assessment and Methodology.⁸¹ Additionally, because PacifiCorp stated that it will continue to implement the WFA-E model and other vendor risk planning model in 2025 and 2026, PacifiCorp must provide an update on its progress in implementing its risk model.⁸²

⁷⁵ [PacifiCorp 2025 WMP Update R2](#) (clean) (Jan. 17, 2025), pp. 31-32 (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57821&shareable=true>, accessed Jan. 21, 2025).

⁷⁶ "PacifiCorp recently implemented WFA-E to begin to quantify its utility risk and expects to continue to learn and evolve its risk assessment process and models as WFA-E is used more and additional solutions are brought online. Table 6-7 highlights the known improvements." [PacifiCorp 2023-2025 Base WMP R6 \(clean\)](#) (Jan. 17, 2025), p. 109 (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57823&shareable=true>, accessed Jan. 21, 2025).

⁷⁷ [PacifiCorp 2023-2025 Base WMP R6](#) (clean) (Jan. 17, 2025), Table 6-7, pp. 110-111 (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57823&shareable=true>, accessed Jan. 21, 2025).

⁷⁸ [PacifiCorp 2023-2025 Base WMP R6](#) (clean) (Jan. 17, 2025), Table 6-7, pp. 110-111 (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57823&shareable=true>, accessed Jan. 21, 2025).

⁷⁹ [PacifiCorp 2023-2025 Base WMP R6](#) (clean) (Jan. 17, 2025), Table 6-7, pp. 110-111 (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57823&shareable=true>, accessed Jan. 21, 2025).

⁸⁰ [PacifiCorp 2023-2025 Base WMP R6](#) (clean) (Jan. 17, 2025), Table 6-7, pp. 110-111 (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57823&shareable=true>, accessed Jan. 21, 2025).

⁸¹ [PacifiCorp 2023-2025 Base WMP R6](#) (clean) (Jan. 17, 2025), Table 6-7, pp. 110-111 (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57823&shareable=true>, accessed Jan. 21, 2025).

⁸² [PacifiCorp 2023-2025 Base WMP R6](#) (clean) (Jan. 17, 2025), Table 6-7, pp. 110-111 (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57823&shareable=true>, accessed Jan. 21, 2025).

Accordingly, PacifiCorp must provide an update on its implementation of its risk model improvements in its 2026-2028 Base WMP, as stated in its risk assessment improvement plan (Table 6-7).⁸³

Energy Safety has modified the area for continued improvement to provide additional guidance for PacifiCorp. PacifiCorp must respond to this revised area for continued improvement in its 2026-2028 Base WMP.

Section 11 provides all areas for continued improvement for PacifiCorp, including the specific required progress that PacifiCorp must address in its 2026-2028 Base WMP.

7.1.2 PC-23B-07. Cross-Utility Collaboration on Best Practices for Inclusion of Climate Change Forecasts in Consequence Modeling, Inclusion of Community Vulnerability in Consequence Modeling, and Utility Vegetation Management for Wildfire Safety

In its Decision on PacifiCorp's 2023-2025 Base WMP, Energy Safety found that PacifiCorp did not make substantive efforts to collaborate with other IOUs in the areas of climate change forecasts in consequence modeling, community vulnerability in consequence modeling, and utility vegetation management for wildfire safety.⁸⁴

Accordingly, Energy Safety required PacifiCorp to participate in all Energy Safety-organized activities related to best practices for:⁸⁵

- Inclusion of climate change forecasts in consequence modeling.
- Inclusion of community vulnerability in consequence modeling.
- Utility vegetation management for wildfire safety.

Energy Safety also required PacifiCorp to collaborate with the other IOUs on the above-mentioned best practices.⁸⁶ Energy Safety required PacifiCorp to provide a status update on

⁸³ [PacifiCorp 2023-2025 Base WMP R6](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57823&shareable=true) (clean) (Jan. 17, 2025), Table 6-7, pp. 110-111 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57823&shareable=true, accessed Jan. 21, 2025).

⁸⁴ [Decision on PacifiCorp 2023-2025 Base WMP](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56309&shareable=true) (Feb. 12, 2024), pp. 32-33 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56309&shareable=true, accessed Oct. 16, 2024).

⁸⁵ [Decision on PacifiCorp 2023-2025 Base WMP](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56309&shareable=true) (Feb. 12, 2024), p. 83 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56309&shareable=true, accessed Oct. 16, 2024).

⁸⁶ [Decision on PacifiCorp 2023-2025 Base WMP](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56309&shareable=true) (Feb. 12, 2024), p. 83 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56309&shareable=true, accessed Oct. 16, 2024).

any cross-utility collaboration on the topics listed above, including a list of any resulting updates to its WMP since its 2023-2025 Base WMP.⁸⁷

In its 2025 WMP Update, PacifiCorp stated it collaborates with other utilities through venues such as Energy Safety’s risk modeling working group meetings⁸⁸ and the May 23, 2023, Community Vulnerability in Wildfire Mitigation Planning scoping meeting.⁸⁹ PacifiCorp also stated that it participates in cross-utility best practice sharing through forums such as the Covered Conductor Joint Utility Working Group⁹⁰ and the International Wildfire Risk Mitigation Consortium.⁹¹ PacifiCorp stated that it expects to participate in future Energy Safety-led scoping meetings,⁹² but has no plans to sponsor collaboration meetings with the other California IOUs on the topics listed above.⁹³ PacifiCorp also stated that it has not broadly collaborated with the other California IOUs since filing its Base WMP in 2023.⁹⁴

7.1.2.1 Energy Safety Evaluation

The area for continued improvement directed all IOUs to collaborate. PacifiCorp demonstrated the first step by participating in forums such as the Covered Conductor Joint Utility Working Group, the International Wildfire Risk Mitigation Consortium, and the Covered Conductor Joint Utility Working Group. However, these are not new examples of collaboration since the 2023-2025 Base WMP submission but rather are examples of PacifiCorp’s continued collaboration efforts. PacifiCorp has not made efforts to collaborate outside of these forums and has no additional plans to further collaborate with the other California IOUs, which does not satisfy the area for continued improvement.

⁸⁷ [Decision on PacifiCorp 2023-2025 Base WMP](#) (Feb. 12, 2024), p. 83 (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56309&shareable=true>, accessed Oct. 16, 2024).

⁸⁸ [PacifiCorp 2025 WMP Update R2](#) (clean) (Jan. 17, 2025), p. 32 (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57821&shareable=true>, accessed Jan. 21, 2025).

⁸⁹ [PacifiCorp 2025 WMP Update R2](#) (clean) (Jan. 17, 2025), p. 33 (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57821&shareable=true>, accessed Jan. 21, 2025).

⁹⁰ [PacifiCorp 2025 WMP Update R2](#) (clean) (Jan. 17, 2025), p. 32 (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57821&shareable=true>, accessed Jan. 21, 2025).

⁹¹ [PacifiCorp 2023-2025 Base WMP R6](#) (clean) (Jan. 17, 2025), p. 311 (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57823&shareable=true>, accessed Jan. 21, 2025).

⁹² [PacifiCorp 2025 WMP Update R2](#) (clean) (Jan. 17, 2025), pp. 32-33 (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57821&shareable=true>, accessed Jan. 21, 2025).

⁹³ [PacifiCorp Response to Data Request OEIS-P-WMP 2024-PC-02](#), Question 3, p. 7 (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57193&shareable=true>, accessed Oct. 17, 2024).

⁹⁴ [PacifiCorp Response to Data Request OEIS-P-WMP 2024-PC-02](#), Question 3, p. 8 (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57193&shareable=true>, accessed Oct. 17, 2024).

Given that PacifiCorp has not made efforts to collaborate with the other California IOUs since its 2023-2025 WMP submission,⁹⁵ in its 2026-2028 Base WMP, PacifiCorp must document and report on its WMP-related collaboration efforts with the five other California IOUs where relevant and appropriate to each IOU's interests.

Energy Safety has modified the area for continued improvement to provide additional guidance for PacifiCorp. PacifiCorp must respond to this revised area for continued improvement in its 2026-2028 Base WMP.

Section 11 provides all areas for continued improvement for PacifiCorp, including the specific required progress that PacifiCorp must address in its 2026-2028 Base WMP.

7.2 New or Discontinued Programs

In its 2025 WMP Update, PacifiCorp did not report any new or discontinued programs related to the wildfire mitigation strategy development section of its 2023-2025 Base WMP.

7.3 Targets, Objectives, and Projected Expenditures

In its 2025 WMP Update, PacifiCorp provided updates to projected expenditures related to the wildfire mitigation strategy development section of its 2023-2025 Base WMP. Energy Safety finds that these reportable updates meet the requirements set forth in the 2025 WMP Update Guidelines.

Specifically, PacifiCorp reported updates to its projected expenditures for two initiatives: wildfire mitigation strategy development (WP-01) and identifying and evaluating mitigation (WP-02) initiatives.⁹⁶

For the wildfire mitigation strategy development initiative (WP-01), PacifiCorp reported an increase of 55 percent in its projected expenditures due to including the cost of an

⁹⁵ [Decision on PacifiCorp 2023-2025 Base WMP](https://efiling.energy.ca.gov/eFiling/Getfile.aspx?fileid=56309&shareable=true) (Feb. 12, 2024), pp. 32-33 (https://efiling.energy.ca.gov/eFiling/Getfile.aspx?fileid=56309&shareable=true, accessed Oct. 16, 2024).

⁹⁶ [PacifiCorp 2025 WMP Update R2](https://efiling.energy.ca.gov/eFiling/Getfile.aspx?fileid=57821&shareable=true) (clean) (Jan. 17, 2025), p. 20 (https://efiling.energy.ca.gov/eFiling/Getfile.aspx?fileid=57821&shareable=true, accessed Jan. 21, 2025).

independent evaluator, which PacifiCorp stated it did not previously include in the scope of this initiative.⁹⁷ PacifiCorp is statutorily required to engage an independent evaluator.^{98, 99}

For the identifying and evaluating mitigation initiative (WP-02), PacifiCorp reported a 180 percent increase for pursuing grant opportunities.¹⁰⁰ While PacifiCorp included grant writing in its 2023-2025 Base WMP,¹⁰¹ PacifiCorp clarified that its projected expenditure increase is driven by studies it must complete for two Grid Resilience and Innovation Partnerships (GRIP) grants.¹⁰²

7.3.1 Energy Safety Evaluation

PacifiCorp reported increased spending on the wildfire mitigation strategy development initiative in accordance with the 2025 WMP Update Guidelines.¹⁰³ This increased spending is due to the addition of PacifiCorp's Independent Evaluator costs, which were not previously included in this initiative.¹⁰⁴

PacifiCorp also reported increased spending on the identifying and evaluating mitigation initiative in accordance with the 2025 WMP Update Guidelines.¹⁰⁵ The cost increase is reflective of studies tied to grant opportunities that PacifiCorp reported in its 2023-2025 Base WMP.¹⁰⁶

⁹⁷ [PacifiCorp 2025 WMP Update R2](#) (clean) (Jan. 17, 2025), p. 22
(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57821&shareable=true>, accessed Jan. 21, 2025).

⁹⁸ [Public Utilities Code § 8386.3](#) (c)(2)(B)(i)
(https://leginfo.legislature.ca.gov/faces/codes_displaySection.xhtml?sectionNum=8386.3.&lawCode=PUC, accessed Jan. 3, 2025).

⁹⁹ [PacifiCorp Response to Data Request OEIS-P-WMP 2024-PC-02](#), Question 3, p. 3
(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57193&shareable=true>, accessed Oct. 17, 2024).

¹⁰⁰ [PacifiCorp 2025 WMP Update R2](#) (clean) (Jan. 17, 2025), p. 20
(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57821&shareable=true>, accessed Jan. 21, 2025).

¹⁰¹ [PacifiCorp Reponse to Data Request OEIS-P-WMP 2024-PC-02](#), Question 3, p. 5
(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57193&shareable=true>, accessed Oct. 17, 2024).

¹⁰² [PacifiCorp Reponse to Data Request OEIS-P-WMP 2024-PC-02](#), Question 3, p. 6
(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57193&shareable=true>, accessed Oct. 17, 2024).

¹⁰³ [2025 WMP Update Guidelines](#), Section 2 “Changes to Approved Targets, Objectives, and Expenditures,” p. 13
(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56254&shareable=true>, accessed Nov. 26, 2024).

¹⁰⁴ [PacifiCorp 2025 WMP Update R2](#) (clean) (Jan. 17, 2025), p. 22
(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57821&shareable=true>, accessed Jan. 21, 2025).

¹⁰⁵ [2025 WMP Update Guidelines](#), Section 2 “Changes to Approved Targets, Objectives, and Expenditures,” p. 13
(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56254&shareable=true>, accessed Nov. 26, 2024).

¹⁰⁶ [PacifiCorp Response to Data Request OEIS-P-WMP 2024-PC-02](#), Question 3, p. 5
(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57193&shareable=true>, accessed Oct. 17, 2024).

7.3.2 Areas for Continued Improvement

Energy Safety has no new areas for continued improvement for PacifiCorp in wildfire mitigation strategy development. In its 2026-2028 Base WMP, PacifiCorp must report its progress on any existing areas for continued improvement specified in Energy Safety's Decision on PacifiCorp's 2023-2025 Base WMP.¹⁰⁷

¹⁰⁷ [Decision on PacifiCorp 2023-2025 Base WMP](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56309&shareable=true) (Feb. 12, 2024), pp. 80-91 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56309&shareable=true, accessed Oct. 16, 2024).

8. Wildfire Mitigation Initiatives

This section provides Energy Safety's evaluation of PacifiCorp's reportable updates related to the following wildfire mitigation initiatives:

- Grid design, operations, and maintenance, including grid design and system hardening, asset inspections, equipment maintenance and repair, and grid operations and procedures
- Vegetation management and inspections
- Situational awareness and forecasting
- Emergency preparedness
- Community outreach and engagement

Energy Safety discusses its evaluation of PacifiCorp's reportable updates related to PSPS in Section 9. Energy Safety includes discussion of any reportable updates affecting PacifiCorp's process for continuous improvement in Section 10.

8.1 Grid Design, Operations, and Maintenance

In its 2025 WMP Update, PacifiCorp provided 27 total updates related to the grid design, operations, and maintenance section of its 2023-2025 Base WMP. The updates PacifiCorp provided related to this section included reporting required progress on 8 areas for continued improvement, reporting 1 new program, and reporting updates to 6 approved targets and 5 projected expenditures. PacifiCorp reported quarterly inspection targets for 9 asset inspection initiatives.

8.1.1 Grid Design and System Hardening

8.1.1.1 2023 Areas for Continued Improvement

PacifiCorp reported its progress on one area for continued improvement in the grid design and system hardening section in its 2025 WMP Update.

PC-23B-08. Covered Conductor Installation Progress

In its Decision on PacifiCorp's 2023-2025 Base WMP, Energy Safety found that PacifiCorp historically failed to meet covered conductor targets and was not on pace to reach its 2023 target.¹⁰⁸ Energy Safety noted that PacifiCorp's 2023-2025 Base WMP did not demonstrate

¹⁰⁸ [Decision on PacifiCorp 2023-2025 Base WMP](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56309&shareable=true) (Feb. 12, 2024), pp. 83-84 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56309&shareable=true, accessed Oct. 16, 2024).

that its covered conductor targets were feasible, nor that PacifiCorp had addressed past implementation barriers.¹⁰⁹

Energy Safety required PacifiCorp to discuss the progress made meeting past and future covered conductor installation targets in its 2025 WMP Update, including how it changed its resource and labor availability as well its assessment of third-party contractors.¹¹⁰

Additionally, Energy Safety required PacifiCorp to provide a spreadsheet with the covered conductor locations and mileage completed in 2023 and scoped for 2024 and 2025, a list of historical constraints that prevented PacifiCorp from reaching its covered conductor targets, and a plan to address each constraint.¹¹¹

In its response, PacifiCorp provided an attachment demonstrating it installed 101 miles of a targeted 130 miles of covered conductor in 2023.¹¹² The attachment listed the planned covered conductor locations for 2024 (80 miles) and 2025 (135 miles).

PacifiCorp identified three constraints that have historically prevented it from reaching covered conductor targets: resources, permitting, and material.¹¹³ To address the resource constraints, PacifiCorp stated it onboarded a contractor to assist in the areas identified above.¹¹⁴ To address the permitting and material constraints, PacifiCorp stated it plans to identify and begin the permitting process earlier and order additional material.¹¹⁵

PacifiCorp stated that it hired a contractor to support covered conductor installations, which doubled the available project management resources, increased construction staff by 50 percent, and provided 15 additional engineering staff.¹¹⁶ PacifiCorp reported that the

¹⁰⁹ [Decision on PacifiCorp 2023-2025 Base WMP](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56309&shareable=true) (Feb. 12, 2024), pp. 83-84 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56309&shareable=true, accessed Oct. 16, 2024).

¹¹⁰ [Decision on PacifiCorp 2023-2025 Base WMP](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56309&shareable=true) (Feb. 12, 2024), pp. 83-84 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56309&shareable=true, accessed Oct. 16, 2024).

¹¹¹ [Decision on PacifiCorp 2023-2025 Base WMP](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56309&shareable=true) (Feb. 12, 2024), pp. 83-84 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56309&shareable=true, accessed Oct. 16, 2024).

¹¹² PacifiCorp 2025 Update R2 (clean) (Jan. 17, 2025), Attachment [PC CA Line Rebuild Data 2023-2025](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57824&shareable=true) (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57824&shareable=true, accessed Jan. 21, 2025).

¹¹³ [PacifiCorp 2023-2025 Update R2](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57821&shareable=true) (clean) (Jan. 17, 2025) pp. 33-34 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57821&shareable=true, accessed Jan 21, 2025).

¹¹⁴ [PacifiCorp 2023-2025 Update R2](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57821&shareable=true) (clean) (Jan. 17, 2025) pp. 33-34 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57821&shareable=true, accessed Jan 21, 2025).

¹¹⁵ [PacifiCorp 2023-2025 Update R2](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57821&shareable=true) (clean) (Jan. 17, 2025) pp. 33-34 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57821&shareable=true, accessed Jan 21, 2025).

¹¹⁶ [PacifiCorp 2023-2025 Update R2](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57821&shareable=true) (clean) (Jan. 17, 2025) pp. 33-34 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57821&shareable=true, accessed Jan 21, 2025).

contractor will provide project management, project controls, project reporting, engineering, estimating, permitting, surveying, material management, and construction support.¹¹⁷

In its 2025 WMP Update, PacifiCorp increased its 2025 covered conductor installation target from 80 to 120 miles¹¹⁸ and provided an attachment listing covered conductor project locations, circuits, lines miles, completion year, and project status to support the reported increase.¹¹⁹

Energy Safety Evaluation

PacifiCorp provided an update on the progress it made on covered conductor projects through January 1, 2024, and the outcome of its third-party contractor assessment, which resulted in onboarding a contractor to support its covered conductor installation. Given PacifiCorp's doubling of its project management resources and 50 percent increase in construction staff, Energy Safety finds PacifiCorp's covered conductor targets of 80 miles in 2024 and its reported increase to 120 miles in 2025 to be feasible given its plan to address its resource, permitting, and material constraints.

PacifiCorp sufficiently responded to this area for continued improvement; no further reporting is required on this area for continued improvement in PacifiCorp's 2026-2028 Base WMP.

8.1.1.2 New or Discontinued Programs

In its 2025 WMP Update, PacifiCorp reported creating one new program related to the grid design and system hardening section of its 2023-2025 Base WMP. Energy Safety finds that this update meets the reportable update criteria set forth in the 2025 WMP Update Guidelines.

In its 2025 WMP Update, PacifiCorp reported its plan to add a microgrid initiative. PacifiCorp is targeting the completion of a microgrid feasibility study in 2025.¹²⁰ PacifiCorp stated the feasibility studies performed in 2024 and 2025 will be used to identify areas where microgrids could be utilized.¹²¹

¹¹⁷ [PacifiCorp 2023-2025 Update R2](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57821&shareable=true) (clean) (Jan. 17, 2025) pp. 33-34 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57821&shareable=true, accessed Jan 21, 2025).

¹¹⁸ [PacifiCorp 2023-2025 Update R2](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57821&shareable=true) (clean) (Jan. 17, 2025) p. 15 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57821&shareable=true, accessed Jan 21, 2025).

¹¹⁹ PacifiCorp 2025 Update R2 (clean) (Jan. 17, 2025), Attachment [PC CA Line Rebuild Data 2023-2025](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57824&shareable=true) (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57824&shareable=true, accessed Jan. 21, 2025).

¹²⁰ [PacifiCorp 2023-2025 Base WMP R6](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57823&shareable=true) (clean) (Jan. 17, 2025), p. 159 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57823&shareable=true, accessed Jan 21, 2025).

¹²¹ [PacifiCorp 2023-2025 Update R2](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57821&shareable=true) (clean) (Jan. 17, 2025) p. 25 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57821&shareable=true, accessed Jan 21, 2025).

Energy Safety Evaluation

In response to PacifiCorp's reported new program, as summarized above, Energy Safety finds that performing microgrid feasibility studies may increase PacifiCorp's wildfire mitigation portfolio by identifying areas in its service territory where microgrids are feasible. Comparing the feasibility, effectiveness, and cost-benefit of multiple mitigation options is a critical component of efficient risk mitigation decision-making. Energy Safety expects to review the results of PacifiCorp's 2024 microgrid feasibility study during the evaluation of PacifiCorp's 2026-2028 Base WMP.

Areas for Continued Improvement

Energy Safety has no new areas for continued improvement for PacifiCorp's new or discontinued programs in grid design and system hardening.

8.1.1.3 Targets, Objectives, and Projected Expenditures

In its 2025 WMP Update, PacifiCorp provided updates to approved targets and projected expenditures related to the grid design and system hardening section of its 2023-2025 Base WMP. Energy Safety finds that these reportable updates meet the requirements set forth in the 2025 WMP Update Guidelines.

Specifically, PacifiCorp provided updates to its targets for covered conductor installation (GH-01), distribution pole replacements (GH-02), and transmission pole/tower replacements (GH-03) initiatives. PacifiCorp additionally updated its projected expenditure for covered conductor installation.

PacifiCorp reported an increase to its target for covered conductor installation from 80 to 120 line miles due to onboarding a contractor to supplement the resourcing and installation of covered conductor.¹²² PacifiCorp stated that because it performs pole replacements during covered conductor installation,¹²³ its targets for pole replacements increased from 1,600 poles to 2,400 poles for distribution, and 160 poles to 240 poles for transmission.

PacifiCorp increased its projected expenditure for covered conductor installation from \$62,000,000 to \$120,000,000 due to increasing the target by 40 miles and hiring a contractor to manage the construction.¹²⁴

¹²² [PacifiCorp 2023-2025 Update R2](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57821&shareable=true) (clean) (Jan. 17, 2025) pp. 33-34 (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57821&shareable=true>, accessed Jan 21, 2025).

¹²³ [PacifiCorp 2023-2025 Update R2](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57821&shareable=true) (clean) (Jan. 17, 2025) pp. 33-34 (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57821&shareable=true>, accessed Jan 21, 2025).

¹²⁴ [PacifiCorp 2023-2025 Update R2](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57821&shareable=true) (clean) (Jan. 17, 2025) pp. 33-34 (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57821&shareable=true>, accessed Jan 21, 2025).

Energy Safety Evaluation

In its approved 2023-2025 Base WMP, PacifiCorp targeted completing 130 miles of covered conductor in 2023, 80 miles in 2024, and 80 miles in 2025 for a total of 290 miles. However, PacifiCorp stated that in 2023 it only completed 101 of its targeted 130 miles.¹²⁵ Given the 101 miles that PacifiCorp stated it completed in 2023, the 80 miles it targeted for completion in 2024, and the target increase PacifiCorp provided in its 2025 WMP Update to 120 miles for 2025, the scoped work for the 2023-2025 Base WMP cycle increased from 290 to 301 miles. Energy Safety finds that PacifiCorp's target increases for covered conductor installation and associated pole replacements may reduce additional wildfire risk through hardening eleven additional miles.

PacifiCorp's 2025 projected expenditure increase for covered conductor installation is \$120,000,000 for the targeted 120 miles. Energy Safety finds that PacifiCorp reported the projected expenditure in accordance with the 2025 WMP Update Guidelines.¹²⁶ The projected expenditure increase is due to PacifiCorp's increase of its target by 40 miles and its engagement of a third-party contractor.

Areas for Continued Improvement

Energy Safety has no new areas for continued improvement for PacifiCorp in grid design and system hardening.

8.1.2 Asset Inspections

8.1.2.1 2023 Areas for Continued Improvement

PacifiCorp reported its progress on five areas for continued improvement in the asset inspections section in its 2025 WMP Update.

PC-23B-09. QA/QC Pass Rate Targets for Rural Areas

In its Decision on PacifiCorp's 2023-2025 Base WMP, Energy Safety found that PacifiCorp's pass rate targets for detailed and intrusive pole inspections were significantly lower than the actual pass rates it achieved in 2022.¹²⁷ Energy Safety required PacifiCorp to set QA/QC pass

¹²⁵ PacifiCorp 2025 Update R2 (clean) (Jan. 17, 2025), Attachment [PC CA Line Rebuild Data 2023-2025](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57824&shareable=true) (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57824&shareable=true, accessed Jan. 21, 2025).

¹²⁶ [2025 WMP Update Guidelines](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56254&shareable=true), Section 2 "Changes to Approved Targets, Objectives, and Expenditures," p. 13 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56254&shareable=true, accessed Nov. 26, 2024).

¹²⁷ [Decision on PacifiCorp 2023-2025 Base WMP](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56309&shareable=true) (Feb. 12, 2024), p. 84 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56309&shareable=true, accessed Oct. 16, 2024).

rate targets that align with its actual 2022 pass rates of 97 percent and the California industry standard of 95 to 100 percent.¹²⁸

In its 2025 WMP Update, PacifiCorp stated that it will consider updating its QA/QC pass rate targets¹²⁹ and that its QA/QC targets in Table 8-7 of its 2023-2025 Base WMP reflect the contractual obligations of its contractors that perform the detailed and intrusive pole inspections.¹³⁰ PacifiCorp stated it will explore amending the current QA/QC contractual requirements with its contractors and evaluate if QA/QC processes and pass rates, separate from those used by contractors, would be appropriate for WMP reporting. PacifiCorp expressed concern that higher QA/QC pass rate targets could deter improvements to the QA/QC process itself.¹³¹ PacifiCorp also stated that a more thorough QA/QC process could improve inspection quality more than a less thorough process, even if the pass rate is lower.¹³²

Energy Safety Evaluation

PacifiCorp committed to re-evaluating its QA/QC pass rate targets and the QA/QC process used in WMP reporting. While PacifiCorp's concern that higher QA/QC targets could deter improvements to the QA/QC process bears consideration, Energy Safety finds that the mechanism of QA/QC process improvement must be independent from the mechanism of QA/QC pass rate improvement. QA/QC pass rates are not a means to gauge the effectiveness of a QA/QC process, but rather a metric to evaluate the quality of inspection or construction activities and whether established processes are being followed.

In its 2026-2028 Base WMP, PacifiCorp must report on the outcome of its contract negotiations regarding QA/QC pass rate requirements and its evaluation of separate QA/QC processes. PacifiCorp must explain why its pass rate targets for 2026-2028 are appropriate and how the pass rate targets drive improvement in inspection quality.

Also, if PacifiCorp does not increase its pass rate targets for 2026-2028, PacifiCorp must provide in its 2026-2028 Base WMP its actual 2023 and 2024 pass rates, the factors resulting in inspections failing QA/QC, tabular information on all inspections that failed QA/QC, and an

¹²⁸ [Decision on PacifiCorp 2023-2025 Base WMP](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56309&shareable=true) (Feb. 12, 2024), p. 84 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56309&shareable=true, accessed Oct. 16, 2024).

¹²⁹ [PacifiCorp 2023-2025 Update R2](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57821&shareable=true) (clean) (Jan. 17, 2025) pp. 34-35 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57821&shareable=true, accessed Jan 21, 2025).

¹³⁰ [PacifiCorp 2023-2025 Update R2](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57821&shareable=true) (clean) (Jan. 17, 2025) pp. 34-35 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57821&shareable=true, accessed Jan 21, 2025).

¹³¹ [PacifiCorp 2023-2025 Update R2](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57821&shareable=true) (clean) (Jan. 17, 2025) pp. 34-35 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57821&shareable=true, accessed Jan 21, 2025).

¹³² [PacifiCorp 2023-2025 Update R2](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57821&shareable=true) (clean) (Jan. 17, 2025) pp. 34-35 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57821&shareable=true, accessed Jan 21, 2025).

analysis demonstrating that its 2026-2028 pass rate targets drive improvement in the quality of its inspections.

Energy Safety has modified the area for continued improvement to provide additional guidance for PacifiCorp. PacifiCorp must respond to this revised area for continued improvement in its 2026-2028 Base WMP.

Section 11 provides all areas for continued improvement for PacifiCorp, including the specific required progress that PacifiCorp must address in its 2026-2028 Base WMP.

PC-23B-10. Covered Conductor Inspections and Maintenance

In its Decision on PacifiCorp's 2023-2025 Base WMP, Energy Safety found that PacifiCorp's inspection programs do not include checks that address failure modes specific to covered conductor.¹³³ Energy Safety required PacifiCorp to discuss how failure modes such as water intrusion, splice covers, and surface damage would be accounted for in its inspections.¹³⁴ If PacifiCorp elected not to change its inspection procedures, Energy Safety required PacifiCorp to discuss how its current inspection and maintenance processes adequately address covered conductor failure modes.¹³⁵

In its 2025 WMP Update, PacifiCorp stated that its Procedure 069 includes inspection condition codes specific to covered conductor failure modes, and inspection condition codes that identify the symptoms of potential covered conductor failures.¹³⁶ Procedure 069 contains inspection condition codes for frayed covered conductor, loose covered conductor, and "other" covered conductor conditions,¹³⁷ as well as inspection condition codes for distribution and transmission conductor sag.¹³⁸

Energy Safety Evaluation

PacifiCorp's Procedure 069 lists inspection condition codes specific to covered conductor use, and condition codes that address broader concerns such as transmission and

¹³³ [Decision on PacifiCorp 2023-2025 Base WMP](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56309&shareable=true) (Feb. 12, 2024), pp. 44-45 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56309&shareable=true, accessed Oct. 16, 2024).

¹³⁴ [Decision on PacifiCorp 2023-2025 Base WMP](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56309&shareable=true) (Feb. 12, 2024), p. 85 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56309&shareable=true, accessed Oct. 16, 2024).

¹³⁵ [Decision on PacifiCorp 2023-2025 Base WMP](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56309&shareable=true) (Feb. 12, 2024), pp. 44-45 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56309&shareable=true, accessed Oct. 16, 2024).

¹³⁶ [PacifiCorp 2023-2025 Base WMP R6](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57823&shareable=true) (clean) (Jan. 17, 2025), p. 163 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57823&shareable=true, accessed Jan 21, 2025).

¹³⁷ [PacifiCorp Response to Data Request OEIS-P-WMP-PC-08](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57598&shareable=true), Question 5, Attach 8.5 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57598&shareable=true, accessed Nov. 8, 2024).

¹³⁸ [PacifiCorp Response to OEIS-P-WMP-PC-08](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57598&shareable=true), Question 5, Attach 8.5 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57598&shareable=true, accessed Nov. 8, 2024).

distribution sag, all of which represent various failure modes. These inspection condition codes will allow PacifiCorp to identify and flag surface damage, missing splice covers, and water intrusion for remediation. PacifiCorp sufficiently responded to this area for continued improvement; no further reporting is required on this area for continued improvement in PacifiCorp's 2026-2028 Base WMP.

PC-23B-11. Distribution Detailed Inspection Frequency

In its Decision on PacifiCorp's 2023-2025 Base WMP, Energy Safety found that PacifiCorp performed the minimum detailed inspection frequency required by General Order (GO) 95 and GO 165, which require that assets undergo a detailed inspection every five years.^{139, 140} Energy Safety required PacifiCorp to strive to exceed the minimum GO requirements by adopting a risk-based detailed inspection approach and increasing the frequency of asset inspections on its highest risk circuits.¹⁴¹ Energy Safety also required PacifiCorp to outline a plan to update its detailed inspection process in high-risk areas. The plan was required to include an analysis for determining an appropriate inspection frequency, prioritization of higher risk areas, updates to inspection checklists for equipment and configurations posing higher wildfire risk, and a plan to obtain the required workforce.¹⁴² If PacifiCorp elected not to provide a plan to update its detailed inspection frequencies, it was required to demonstrate that its existing inspection program adequately addresses wildfire risk.¹⁴³

In its 2025 WMP Update, PacifiCorp provided an analysis comparing Level 1 (highest risk) conditions found through detailed inspections to conditions found during patrols. PacifiCorp found that detailed inspections resulted in more Level 1 findings than patrols.¹⁴⁴ For 2025, PacifiCorp committed to performing detailed inspections on all assets in the HFTD Tier 3 and evaluating the results to determine if inspection frequency should be updated for HFTD Tier 3 and Tier 2 locations.¹⁴⁵

¹³⁹ [General Order 165](https://docs.cpuc.ca.gov/PUBLISHED/GENERAL_ORDER/159182.htm), Table 1 (https://docs.cpuc.ca.gov/PUBLISHED/GENERAL_ORDER/159182.htm, accessed Nov. 10, 2024).

¹⁴⁰ [Decision on PacifiCorp's 2023-2025 Base WMP](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56309&shareable=true) (Feb. 12, 2024), p. 85 (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56309&shareable=true>, accessed Nov. 7, 2024).

¹⁴¹ [Decision on PacifiCorp's 2023-2025 Base WMP](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56309&shareable=true) (Feb. 12, 2024), p. 85 (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56309&shareable=true>, accessed Nov. 7, 2024).

¹⁴² [Decision on PacifiCorp's 2023-2025 Base WMP](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56309&shareable=true) (Feb. 12, 2024), p. 85 (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56309&shareable=true>, accessed Nov. 7, 2024).

¹⁴³ [Decision on PacifiCorp's 2023-2025 Base WMP](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56309&shareable=true) (Feb. 12, 2024), p. 85 (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56309&shareable=true>, accessed Nov. 7, 2024).

¹⁴⁴ [PacifiCorp 2023-2025 Update R2](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57821&shareable=true) (clean) (Jan. 17, 2025) pp. 36 (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57821&shareable=true>, accessed Jan 21, 2025).

¹⁴⁵ [PacifiCorp 2023-2025 Update R2](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57821&shareable=true) (clean) (Jan. 17, 2025) p. 36 (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57821&shareable=true>, accessed Jan 21, 2025).

Energy Safety Evaluation

Though PacifiCorp did not update its inspection checklists for equipment and configurations posing higher wildfire risk, it committed to increasing the frequency of inspections in the HFTD Tier 3.¹⁴⁶

PacifiCorp did not provide a plan to obtain additional workforce to meet the increased inspection commitment; however, PacifiCorp stated it met its annual detailed distribution target for 2023 and exceeded its 2024 third quarter cumulative target by over 1,400 inspections.¹⁴⁷ Energy Safety finds it likely that PacifiCorp's existing workforce will be sufficient to perform the additional inspections, and that PacifiCorp's decision to perform detailed inspections in 2025 on all HFTD Tier 3 assets may mitigate more risk than adhering to the minimum required frequency established by GO 95 and GO 165. PacifiCorp sufficiently responded to this area for continued improvement; no further reporting is required on this area for continued improvement in PacifiCorp's 2026-2028 Base WMP.

PC-23B-12. Priority A/Level 1 Remediation and Imminent Threat Designation

In its Decision on PacifiCorp's 2023-2025 Base WMP, Energy Safety found that PacifiCorp did not demonstrate that it consistently or properly identified Level 1¹⁴⁸ conditions as imminent threats; did not demonstrate that it can reliably track conditions identified as imminent threats; and did not demonstrate that its remediation timeframe for conditions not classified as imminent threats effectively mitigates risk.¹⁴⁹ Energy Safety required PacifiCorp to provide a plan to engage a third party to audit all Level 1 conditions PacifiCorp identified from 2020 to 2023 and determine if the conditions should have been classified as an imminent threat, if the assigned remediation timeframe was appropriate, and if the actual time taken to remediate was appropriate.¹⁵⁰ Energy Safety also required PacifiCorp to create and implement a record

¹⁴⁶ [PacifiCorp 2023-2025 Update R2](#) (clean) (Jan. 17, 2025) p. 37 (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57821&shareable=true>, accessed Jan 21, 2025).

¹⁴⁷ [PacifiCorp 2024 QDR, Q3](#), Tables 1-15 (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57563&shareable=true>, accessed Dec. 12, 2024).

¹⁴⁸ In response to [Cal Advocates Data Request 8.2](#), PacifiCorp stated that Level 1 conditions as defined by GO 95 are designated as "Priority A" conditions internally. (https://www.pacificorp.com/content/dam/pcorp/documents/en/pacificorp/wildfire-mitigation/responses-issued/PacifiCorp_Response_CalAdvocates-PacifiCorp-2023WMP-8.2.pdf, accessed Nov. 8, 2024).

¹⁴⁹ [Decision on PacifiCorp's 2023-2025 Base WMP](#) (Feb. 12, 2024), p. 86 (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56309&shareable=true>, accessed Nov. 7, 2024).

¹⁵⁰ [Decision on PacifiCorp's 2023-2025 Base WMP](#) (Feb. 12, 2024), p. 86 (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56309&shareable=true>, accessed Nov. 7, 2024).

keeping category to track conditions identified as imminent threats, and to update its asset management procedures to reflect the new record keeping category.¹⁵¹

In its 2025 WMP Update, PacifiCorp stated that it updated its imminent threat inspection condition code¹⁵² and that it established procedures to record imminent threat conditions at the time of identification and enter the data into its system of record.¹⁵³ PacifiCorp stated that it is updating training materials, and in 2025 all Level 1 conditions will be tracked separately from Priority A conditions.¹⁵⁴

PacifiCorp stated it will create a new internal priority level, “I-priority,” to track imminent threat conditions.¹⁵⁵ PacifiCorp stated that:

- Priority “I” conditions will correspond to GO 95 Level 1 conditions;
- Priority A conditions will correspond GO 95 Level 2 conditions that PacifiCorp considers higher risk; and
- Priority B conditions will correspond to GO 95 Level 2 conditions that PacifiCorp considers lower risk.¹⁵⁶

Energy Safety Evaluation

By committing to establishing a trackable imminent threat inspection condition code by 2025, PacifiCorp has adequately responded to part of this area for continued improvement.

However, PacifiCorp did not provide a plan to engage a third party to audit all Level 1 conditions identified from 2020 to 2023 as required by Energy Safety’s 2023 Decision. Energy Safety has modified the area for continued improvement to provide additional guidance for PacifiCorp. PacifiCorp must respond to this revised area for continued improvement in its 2026-2028 Base WMP.

¹⁵¹ [Decision on PacifiCorp 2023-2025 Base WMP](#) (Feb. 12, 2024), p. 86 (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56309&shareable=true>, accessed Oct. 16, 2024).

¹⁵² [PacifiCorp 2023-2025 Base WMP R6](#) (clean) (Jan. 17, 2025), p. 179 (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57823&shareable=true>, accessed Jan 21, 2025).

¹⁵³ [PacifiCorp 2023-2025 Base WMP R6](#) (clean) (Jan. 17, 2025), p. 179 (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57823&shareable=true>, accessed Jan 21, 2025).

¹⁵⁴ [PacifiCorp 2023-2025 Base WMP R6](#) (clean) (Jan. 17, 2025), p. 179 (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57823&shareable=true>, accessed Jan 21, 2025).

¹⁵⁵ PacifiCorp response to [Cal Advocates Data Request 3.9](#) (https://www.pacificorp.com/content/dam/pcorp/documents/en/pacificorp/wildfire-mitigation/responses-issued/CalAdvocates_3.9.docx, accessed Nov. 7, 2024).

¹⁵⁶ PacifiCorp response to [Cal Advocates Data Request 3.9](#) (https://www.pacificorp.com/content/dam/pcorp/documents/en/pacificorp/wildfire-mitigation/responses-issued/CalAdvocates_3.9.docx, accessed Nov. 7, 2024).

Section 11 provides all areas for continued improvement for PacifiCorp, including the specific required progress that PacifiCorp must address in its 2026-2028 Base WMP.

PC-23B-13. Priority A/Level 1 Condition Remediation Delays

In its Decision on PacifiCorp's 2023-2025 Base WMP, Energy Safety found that PacifiCorp did not discuss in sufficient detail how it would mitigate delays in addressing Level 1 conditions caused by access, material, permitting, and resource constraints.¹⁵⁷ Energy Safety required PacifiCorp to provide the tools and process changes it planned to implement to address each constraint.¹⁵⁸

In its response, PacifiCorp stated that access delays were mostly due to weather conditions such as snow and wet or muddy access roads.¹⁵⁹

PacifiCorp stated that material for special order items that cannot be stocked in inventory continues to impact a small number of conditions on its transmission system.¹⁶⁰

PacifiCorp stated that it is mitigating permitting delays by conducting the permitting process in parallel with project design,¹⁶¹ allowing it to secure permits as soon as possible.¹⁶²

Energy Safety Evaluation

PacifiCorp discussed how it would mitigate delays associated with three of the four constraints. PacifiCorp did not discuss how it would mitigate delays associated with resources and thus did not address all requirements of PC-23B-13.

Energy Safety created PC-23B-13 with the understanding that PacifiCorp's Priority A conditions corresponded directly with GO 95 Level 1 conditions, as stated in response to a Cal

¹⁵⁷ [Decision on PacifiCorp 2023-2025 Base WMP](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56309&shareable=true) (Feb. 12, 2024), pp. 86-87 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56309&shareable=true, accessed Oct. 16, 2024).

¹⁵⁸ [Decision on PacifiCorp 2023-2025 Base WMP](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56309&shareable=true) (Feb. 12, 2024), pp. 86-87 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56309&shareable=true, accessed Oct. 16, 2024).

¹⁵⁹ [PacifiCorp 2023-2025 Update R2](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57821&shareable=true) (clean) (Jan. 17, 2025) p. 38 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57821&shareable=true, accessed Jan 21, 2025).

¹⁶⁰ [PacifiCorp 2023-2025 Update R2](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57821&shareable=true) (clean) (Jan. 17, 2025) p. 38 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57821&shareable=true, accessed Jan 21, 2025).

¹⁶¹ [PacifiCorp 2023-2025 Update R2](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57821&shareable=true) (clean) (Jan. 17, 2025) p. 38 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57821&shareable=true, accessed Jan 21, 2025).

¹⁶² [PacifiCorp 2023-2025 Update R2](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57821&shareable=true) (clean) (Jan. 17, 2025) p. 38 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57821&shareable=true, accessed Jan 21, 2025).

Advocates 2023 data request.¹⁶³ However, in its response to a 2024 data request, PacifiCorp implied that Priority A conditions include both GO 95 Level 1 conditions and some GO 95 Level 2 conditions.¹⁶⁴ This conflicts with Energy Safety’s understanding of the correlation between PacifiCorp’s condition codes and GO 95 based on PacifiCorp’s 2023-2025 Base WMP¹⁶⁵ and its response to Cal Advocates’ 2023 data request 8.2.¹⁶⁶

Energy Safety will revisit PCB-23B-13 after PacifiCorp completes the third-party audit of its Priority A remediation timeframes, required by PC-23B-12 and continued in PC-25U-07. Energy Safety will additionally consider the remediation timeframes of PacifiCorp’s newly established I-priority conditions from January 1, 2025, to December 31, 2025. No further reporting is required on this area for continued improvement in PacifiCorp’s 2026-2028 Base WMP.

Section 11 provides all areas for continued improvement for PacifiCorp, including the specific required progress that PacifiCorp must address in its 2026-2028 Base WMP.

8.1.2.2 New or Discontinued Programs

In its 2025 WMP Update, PacifiCorp did not report any new or discontinued programs related to the asset inspections section of its 2023-2025 Base WMP.

8.1.2.3 Targets, Objectives, and Projected Expenditures

In its 2025 WMP Update, PacifiCorp provided quarterly targets (end of Q2 and end of Q3) for nine of its 2025 asset inspection programs, as required by the 2025 WMP Update Guidelines.¹⁶⁷

Additionally, PacifiCorp provided updates to approved targets and projected expenditures related to the asset inspections section of its 2023-2025 Base WMP. Energy Safety finds that these reportable updates meet the requirements set forth in the 2025 WMP Update Guidelines.

¹⁶³ PacifiCorp response to [Cal Advocates Data Request 8.2](#)

(https://www.pacificorp.com/content/dam/pcorp/documents/en/pacificorp/wildfire-mitigation/responses-issued/PacifiCorp_Response_CalAdvocates-PacifiCorp-2023WMP-8.2.pdf, accessed Nov. 7, 2024).

¹⁶⁴ PacifiCorp response to [Cal Advocates Data Request 3.9](#)

(https://www.pacificorp.com/content/dam/pcorp/documents/en/pacificorp/wildfire-mitigation/responses-issued/CalAdvocates_3.9.docx, accessed Nov. 7, 2024).

¹⁶⁵ [PacifiCorp 2023-2025 Base WMP](#) (clean) (Oct. 12, 2023), p 164

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55773&shareable=true>, accessed Oct. 16, 2024).

¹⁶⁶ PacifiCorp response to [Cal Advocates Data Request 8.2](#)

(https://www.pacificorp.com/content/dam/pcorp/documents/en/pacificorp/wildfire-mitigation/responses-issued/PacifiCorp_Response_CalAdvocates-PacifiCorp-2023WMP-8.2.pdf, accessed Nov. 7, 2024).

¹⁶⁷ [2025 WMP Update Guidelines](#), Section 3, “Quarterly Inspection Targets for 2025,” p. 15

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56254&shareable=true>, accessed Apr. 9, 2023).

Specifically, PacifiCorp provided updates to its approved quarterly targets for transmission intrusive pole inspections (AI-05) and inspection quality QA/QC (AI-12), and to its projected expenditures for transmission detailed inspections (AI-03), transmission intrusive pole inspections (AI-05), and distribution intrusive pole inspections (AI-06) initiatives.¹⁶⁸

In its 2025 WMP Update, PacifiCorp reported an increase to its target for transmission intrusive pole inspections from 960 to 1,257 inspections and reported a newly established asset inspection QA/QC target of 756 inspections.¹⁶⁹

PacifiCorp reduced its projected expenditures for transmission detailed inspections by 85 percent (from \$137,000 to \$20,000) and transmission intrusive pole inspections by 63 percent (from \$171,000 to \$64,000).¹⁷⁰

PacifiCorp increased its projected expenditure for distribution intrusive pole inspections by 94 percent (from \$90,000 to \$175,000). PacifiCorp stated that this expenditure increase is due its 2023-2025 Base WMP submitted in 2023 containing an error in the inspection cost figure for transmission intrusive pole inspections, transmission detailed inspections, and distribution intrusive pole inspections. PacifiCorp corrected the error in its 2025 WMP Update.¹⁷¹

Energy Safety Evaluation

PacifiCorp's reported target increase for transmission intrusive pole inspections may result in additional poles being checked for decay and wear, potentially resulting in the repair or replacement of poles that may have otherwise failed. Energy Safety finds that the increased number of inspections may mitigate additional wildfire risk.

Energy Safety finds that PacifiCorp's newly established asset inspection QA/QC target increases its QA/QC scope, which may help PacifiCorp better understand the quality of its inspections, in turn possibly reducing wildfire risk by driving improvements to its inspections.

Per the 2025 WMP Update Guidelines,¹⁷² PacifiCorp appropriately reported projected expenditure reductions of 85 percent for transmission detailed inspections and 63 percent for

¹⁶⁸ [PacifiCorp 2023-2025 Update R2](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57821&shareable=true) (clean) (Jan. 17, 2025) pp. 15-20 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57821&shareable=true, accessed Jan 21, 2025).

¹⁶⁹ [PacifiCorp 2023-2025 Update R2](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57821&shareable=true) (clean) (Jan. 17, 2025) p. 15 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57821&shareable=true, accessed Jan 21, 2025).

¹⁷⁰ [PacifiCorp 2023-2025 Update R2](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57821&shareable=true) (clean) (Jan. 17, 2025) p. 20 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57821&shareable=true, accessed Jan 21, 2025).

¹⁷¹ [PacifiCorp Response to Data Request OEIS-P-WMP_2024-PC-08](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57599&shareable=true), Question 1 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57599&shareable=true, accessed Nov. 10, 2024).

¹⁷² [2025 WMP Update Guidelines](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56254&shareable=true), Section 2 "Changes to Approved Targets, Objectives, and Expenditures," p. 13 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56254&shareable=true, accessed Nov. 9, 2024).

transmission intrusive pole inspections, and a projected expenditure increase of 94 percent for distribution intrusive pole inspections. The updated projected expenditures amount to \$37 per detailed transmission inspection, \$51 per transmission intrusive pole inspection, and \$55 per distribution intrusive pole inspection.

PacifiCorp explained that its inspection target changes do not align with its projected expenditure changes because of an error in its original projected expenditures.

PacifiCorp's quarterly targets for its 2025 asset inspections are consistent with quarterly targets for 2023 and 2024 and meet the requirements of the 2025 WMP Update Guidelines.

Areas for Continued Improvement

Energy Safety has no new areas for continued improvement for PacifiCorp in asset inspections. In its 2026-2028 Base WMP, PacifiCorp must report its progress on any existing areas for continued improvement specified in Energy Safety's Decision on PacifiCorp's 2023-2025 Base WMP.¹⁷³

8.1.3 Equipment Maintenance and Repair

8.1.3.1 2023 Areas for Continued Improvement

PacifiCorp reported its progress on one area for continued improvement in the equipment maintenance and repair section in its 2025 WMP Update.

PC-23B-14. Asset Management and Enterprise Systems

In its Decision on PacifiCorp's 2023-2025 Base WMP, Energy Safety found that PacifiCorp did not have a consolidated asset management and enterprise system.¹⁷⁴ Energy Safety required PacifiCorp to provide an analysis demonstrating that its combination of legacy and enterprise systems comprehensively and efficiently cover its asset inventory and its inspections and maintenance work.¹⁷⁵ For systems with asset inventory data, Energy Safety required the analysis to discuss how inspections are generated and tracked, how inspection findings are tracked, if the work order systems are capable of associating pictures and inspector

¹⁷³ [Decision on PacifiCorp 2023-2025 Base WMP](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56309&shareable=true) (Feb. 12, 2024), pp. 83-88 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56309&shareable=true, accessed Nov. 7, 2024).

¹⁷⁴ [Decision on PacifiCorp 2023-2025 Base WMP](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56309&shareable=true) (Feb. 12, 2024), p. 87 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56309&shareable=true, accessed Oct. 16, 2024).

¹⁷⁵ [Decision on PacifiCorp 2023-2025 Base WMP](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56309&shareable=true) (Feb. 12, 2024), p. 87 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56309&shareable=true, accessed Oct. 16, 2024).

comments with findings, and how asset inventory systems are updated to reflect asset changes due to hardening work.¹⁷⁶

In its 2025 WMP Update, PacifiCorp stated that it uses the IBM Maximo software application suite for substation asset and location data¹⁷⁷ and that Maximo also generates PacifiCorp's substation inspection and work orders.¹⁷⁸

PacifiCorp stated that distribution circuits and transmission lines are represented in Systems Applications and Products in Data Processing (SAP).¹⁷⁹ SAP generates inspection work orders for distribution zones and transmission lines based on the associated inspection frequency, with transmission lines inspected as line segments and distribution circuits as part of a grid.¹⁸⁰ PacifiCorp stated that it tracks individual distribution and transmission asset inventory (such as poles, transformers, and secondary boxes) in the mainframe system Facility Point Inspection (FPI).¹⁸¹

PacifiCorp stated that it uses FPI to track conditions identified during inspections of transmission and distribution assets, and that maintenance personnel can extract existing conditions in a specified area using the Geographic Information Systems Maintenance Organizer (GISMO) tool.¹⁸² PacifiCorp stated that inspector comments associated with conditions can also be viewed in GISMO.¹⁸³ PacifiCorp stated that it also uses PowerMap, a tool to visualize geographic locations that contains pictures of the conditions and surrounding area.¹⁸⁴

¹⁷⁶ [Decision on PacifiCorp 2023-2025 Base WMP](#) (Feb. 12, 2024), p. 87 (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56309&shareable=true>, accessed Oct. 16, 2024).

¹⁷⁷ [PacifiCorp 2023-2025 Update R2](#) (clean) (Jan. 17, 2025) pp. 39-40 (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57821&shareable=true>, accessed Jan 21, 2025).

¹⁷⁸ [PacifiCorp 2023-2025 Update R2](#) (clean) (Jan. 17, 2025) pp. 39-40 (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57821&shareable=true>, accessed Jan 21, 2025).

¹⁷⁹ [PacifiCorp 2023-2025 Update R2](#) (clean) (Jan. 17, 2025) pp. 39-40 (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57821&shareable=true>, accessed Jan 21, 2025).

¹⁸⁰ [PacifiCorp 2023-2025 Update R2](#) (clean) (Jan. 17, 2025) pp. 39-40 (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57821&shareable=true>, accessed Jan 21, 2025).

¹⁸¹ [PacifiCorp 2023-2025 Update R2](#) (clean) (Jan. 17, 2025) pp. 39-40 (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57821&shareable=true>, accessed Jan 21, 2025).

¹⁸² [PacifiCorp 2023-2025 Update R2](#) (clean) (Jan. 17, 2025) pp. 39-40 (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57821&shareable=true>, accessed Jan 21, 2025).

¹⁸³ [PacifiCorp 2023-2025 Update R2](#) (clean) (Jan. 17, 2025) pp. 39-40 (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57821&shareable=true>, accessed Jan 21, 2025).

¹⁸⁴ [PacifiCorp 2023-2025 Update R2](#) (clean) (Jan. 17, 2025) pp. 39-40 (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57821&shareable=true>, accessed Jan 21, 2025).

PacifiCorp is in the process of replacing FPI with Maximo and plans to have all substation, transmission, and distribution assets and locations in the same enterprise asset management software. PacifiCorp plans to retire FPI.¹⁸⁵

Energy Safety Evaluation

PacifiCorp provided descriptions of its asset inventory, inspection, and maintenance systems for its substations, distribution lines, and transmission lines. PacifiCorp discussed how inspections are generated and tracked, how maintenance work orders are generated and tracked, and how pictures are associated with inspection findings.

PacifiCorp stated that it is in the process of replacing its legacy mainframe systems and consolidating its inventory, inspection, and maintenance data.

PacifiCorp did not discuss how its asset inventory systems are updated to reflect system hardening work, its ability to migrate data across systems and ensure accuracy, or indicate its processes to ensure data integrity.

Energy Safety has modified the area for continued improvement to provide additional guidance for PacifiCorp. PacifiCorp must respond to this revised area for continued improvement in its 2026-2028 Base WMP.

8.1.3.2 New or Discontinued Programs

In its 2025 WMP Update, PacifiCorp did not report any new or discontinued programs related to the equipment maintenance and repair section of its 2023-2025 Base WMP.

8.1.3.3 Targets, Objectives, and Projected Expenditures

In its 2025 WMP Update, PacifiCorp provided updates to one approved target and one projected expenditure related to the equipment maintenance and repair section of its 2023-2025 Base WMP. Energy Safety finds that these reportable updates meet the requirements set forth in the 2025 WMP Update Guidelines.

Specifically, PacifiCorp provided updates to its expulsion fuse replacement initiative (GH-05) target and projected expenditure. PacifiCorp increased its expulsion fuse replacement target from zero to 500 fuse locations¹⁸⁶ and increased its projected expenditure from 0 to \$1,000,000.¹⁸⁷ PacifiCorp stated the outputs from its risk model updates and the

¹⁸⁵ [PacifiCorp 2023-2025 Update R2](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57821&shareable=true) (clean) (Jan. 17, 2025) pp. 39-40 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57821&shareable=true, accessed Jan 21, 2025).

¹⁸⁶ [PacifiCorp 2023-2025 Update R2](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57821&shareable=true) (clean) (Jan. 17, 2025) p. 15 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57821&shareable=true, accessed Jan 21, 2025).

¹⁸⁷ [PacifiCorp 2023-2025 Update R2](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57821&shareable=true) (clean) (Jan. 17, 2025) p. 20 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57821&shareable=true, accessed Jan 21, 2025).

establishment of its HFRA resulted in the identification of additional expulsion fuses for replacement.¹⁸⁸

PacifiCorp stated that this initiative (GH-05) replaces non-exempt expulsion fuses with CAL FIRE exempt alternatives.¹⁸⁹

Energy Safety Evaluation

PacifiCorp provided an update to its expulsion fuse replacement target and projected expenditure in accordance with the 2025 WMP Update Guidelines.¹⁹⁰ The design and operation of CAL FIRE exempt equipment is reviewed and tested by both professional third-party electrical engineers and the CAL FIRE Wildfire Planning and Engineering Division to ensure arcs, sparks, and hot particles are not created during operation.¹⁹¹ By expanding the scope of its expulsion fuse replacement, PacifiCorp may further reduce wildfire risk. PacifiCorp's ability to achieve its target of 500 expulsion fuses is supported by its reported replacement of 4,147 fuses in 2023.¹⁹²

Areas for Continued Improvement

Energy Safety has no new areas for continued improvement for PacifiCorp in equipment maintenance and repair.

8.1.4 Grid Operations and Procedures

8.1.4.1 2023 Areas for Continued Improvement

PacifiCorp reported its progress on one area for continued improvement in the grid operations and procedures section in its 2025 WMP Update.

¹⁸⁸ [PacifiCorp 2023-2025 Update R2](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57821&shareable=true) (clean) (Jan. 17, 2025) p. 17 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57821&shareable=true, accessed Jan 21, 2025).

¹⁸⁹ [PacifiCorp 2023-2025 Base WMP R6](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57823&shareable=true) (clean) (Jan. 17, 2025), p. 175 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57823&shareable=true, accessed Jan 21, 2025).

¹⁹⁰ [2025 WMP Update Guidelines](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56254&shareable=true), Section 2 "Changes to Approved Targets, Objectives, and Expenditures," p. 13 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56254&shareable=true, accessed Nov. 26, 2024).

¹⁹¹ [California Power Line Fire Prevention Field Guide](https://34c031f8-c9fd-4018-8c5a-4159cdf6b0d-cdn-endpoint.azureedge.net/-/media/osfm-website/what-we-do/community-wildfire-preparedness-and-mitigation/prevention-field-guides/2021-power-line-fire-prevention-field-guide-ada-final_jf_20210125.pdf) 2021 Edition, pp. 23-24 (https://34c031f8-c9fd-4018-8c5a-4159cdf6b0d-cdn-endpoint.azureedge.net/-/media/osfm-website/what-we-do/community-wildfire-preparedness-and-mitigation/prevention-field-guides/2021-power-line-fire-prevention-field-guide-ada-final_jf_20210125.pdf, accessed Nov. 4, 2024).

¹⁹² [PacifiCorp's 2023 QDR, Q4, Tables 1-15](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56519&shareable=true) (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56519&shareable=true, accessed Dec. 12, 2024).

PC-23B-15. Continued Monitoring of Enhanced Fire Risk (EFR) Settings

In its Decision for PacifiCorp's 2023-2025 Base WMP, Energy Safety required PacifiCorp to provide quantitative data to assess the effectiveness and impact of EFR settings, as PacifiCorp had yet to present this data.¹⁹³ Energy Safety instructed PacifiCorp to provide, in its 2025 WMP Update, data regarding EFR settings enablement, including the number of outages, duration of outages, outage frequency per circuit, number of customers impacted, and response times.¹⁹⁴ Additionally, Energy Safety required PacifiCorp to provide: an updated action plan to reduce reliability and safety impacts based on this data, an evaluation of EFR settings' effectiveness, and a summary of consultations with other electrical corporations to learn best practices regarding settings, thresholds, and impact reductions.¹⁹⁵

In its response, PacifiCorp included an attachment that provides data on the number, duration, and frequency of outages per circuit; number of customers impacted; and response times for circuits with EFR settings enabled.¹⁹⁶ PacifiCorp noted that EFR settings do not directly cause outages, emphasizing that outages can stem from various external factors, such as weather conditions, which could impact conclusions drawn from the data alone.¹⁹⁷ PacifiCorp stated that it has initiated an annual evaluation of circuits utilizing EFR settings to identify and implement targeted short-term mitigation projects, such as upgrading equipment. The annual evaluation will include reliability impacts.¹⁹⁸

PacifiCorp stated that it does not have a quantitative assessment of the effectiveness of its EFR settings,¹⁹⁹ but that it continues to work with peer electrical corporations to explore ways to measure impacts of EFR settings on wildfire risk reduction. PacifiCorp stated it engages with other electrical corporations through joint IOU meetings to share knowledge on

¹⁹³ [Decision on PacifiCorp 2023-2025 Base WMP](#) (Feb. 12, 2024), pp. 87-88 (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56309&shareable=true>, accessed Oct. 16, 2024).

¹⁹⁴ [Decision on PacifiCorp 2023-2025 Base WMP](#) (Feb. 12, 2024), pp. 87-88 (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56309&shareable=true>, accessed Oct. 16, 2024).

¹⁹⁵ [Decision on PacifiCorp 2023-2025 Base WMP](#) (Feb. 12, 2024), pp. 87-88 (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56309&shareable=true>, accessed Oct. 16, 2024).

¹⁹⁶ PacifiCorp 2025 Update R2 (Jan. 17, 2025), [EFR Outage Summary and Data Attachment](#) (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57825&shareable=true>, accessed Jan. 17, 2025).

¹⁹⁷ [PacifiCorp 2025 WMP Update R2](#) (clean) (Jan. 17, 2025), p.41 (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57821&shareable=true>, accessed Jan. 21, 2025).

¹⁹⁸ [PacifiCorp 2025 WMP Update R2](#) (clean) (Jan. 17, 2025), p. 42 (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57821&shareable=true>, accessed Jan. 21, 2025).

¹⁹⁹ [PacifiCorp 2025 WMP Update R2](#) (clean) (Jan. 17, 2025), p. 42 (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57821&shareable=true>, accessed Jan. 21, 2025).

implementation of EFR settings and strategies, and that it attends events such as the Center for Energy Advancement through Technological Innovation (CEATI) meeting in 2024.²⁰⁰

Energy Safety Evaluation

By providing relevant data on outages and demonstrated efforts to evaluate and mitigate reliability impacts, PacifiCorp only partially met the requirements of the area for continued improvement. PacifiCorp did not provide an evaluation or quantitative data to assess the effectiveness of EFR settings, an updated action plan to reduce reliability and safety impacts, or a summary of consultations with other electrical corporations, as required. Instead, PacifiCorp initiated an annual evaluation of its circuits utilizing EFR settings.

After analyzing PacifiCorp's data, Energy Safety finds that the average number of customers impacted and response times during outages were higher from 2021 to 2023 when EFR settings were enabled,²⁰¹ which may be due to higher sensitivity settings and longer line clearing times. PacifiCorp must continue to provide outage data relating to when EFR settings are enabled.

Energy Safety has modified the requirement to provide a plan of action. PacifiCorp must provide the latest progress of its annual evaluation of circuits placed into EFR settings and a description of any short-term mitigation project identified from this evaluation. This annual evaluation will help PacifiCorp with providing an action plan for future WMP filings.

Furthermore, Energy Safety finds that while PacifiCorp's selective application criteria for enabling EFR settings, which are based on specific daily risk assessments, may be an effective procedure, PacifiCorp must have an effectiveness evaluation to complement its current processes. PacifiCorp must consider the number of devices, weather, and environmental factors when performing a quantitative assessment of the effectiveness of its EFR settings.²⁰²

Energy Safety has modified the area for continued improvement to provide additional guidance for PacifiCorp. PacifiCorp must respond to this revised area for continued improvement in its 2026-2028 Base WMP.

Section 11 provides all areas for continued improvement for PacifiCorp, including the specific required progress that PacifiCorp must address in its 2026-2028 Base WMP.

²⁰⁰ [PacifiCorp 2025 WMP Update R2](#) (clean) (Jan. 17, 2025), p. 42 (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57821&shareable=true>, accessed Jan. 21, 2025).

²⁰¹ [EFR Outage Summary and Data Attachment](#), "2023 EFR Outages" sheet, "2022 EFR Outages" sheet, "2021 EFR Outages" sheet, Columns D "Customers Interrupted" and G "Outage Response Time" (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57825&shareable=true>, accessed Jan. 21, 2025).

²⁰² [PacifiCorp 2025 WMP Update R2](#) (clean) (Jan. 17, 2025), p. 41 (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57821&shareable=true>, accessed Jan. 21, 2025).

8.1.4.2 New or Discontinued Programs

In its 2025 WMP Update, PacifiCorp did not report any new or discontinued programs related to the grid operations and procedures section of its 2023-2025 Base WMP.

8.1.4.3 Targets, Objectives, and Projected Expenditures

In its 2025 WMP Update, PacifiCorp did not report any updates to approved targets, objectives, or projected expenditures related to the grid operations and procedures section of its 2023-2025 Base WMP.

8.2 Vegetation Management and Inspections

In its 2025 WMP Update, PacifiCorp provided 14 updates related to the vegetation management and inspections section of its 2023-2025 Base WMP. The updates PacifiCorp provided related to this section included reporting progress on 4 updates to end-of-year 2025 targets, 2 updates to objective completion dates, 2 updates to projected expenditures, and 6 quarterly targets for 2025 vegetation management inspection programs. PacifiCorp also stated that it will report on area for continued improvement PC-23B-16 in its 2026-2028 Base WMP.²⁰³

8.2.1 2023 Areas for Continued Improvement

PacifiCorp reported its progress on one area for continued improvement in the vegetation management and inspections section in its 2025 WMP Update.

8.2.1.1 PC-23B-16. Vegetation Management Priority Tagging

In its Decision on PacifiCorp's 2023-2025 Base WMP, Energy Safety required PacifiCorp to develop and present risk-based criteria for determining and assigning priority to work locations, including remediation timelines for each priority level, and to present a plan to operationalize these criteria in its 2026-2028 Base WMP.²⁰⁴

PacifiCorp elected to report in its 2025 WMP Update that it will provide an update on its progress toward developing risk-based criteria and a plan to operationalize those criteria in its 2026-2028 Base WMP.²⁰⁵ PacifiCorp must respond to this area for continued improvement in its 2026-2028 Base WMP.

²⁰³ [PacifiCorp 2025 WMP Update R2](#) (clean) (Jan. 17, 2025), p. 43
(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57821&shareable=true>, accessed Jan. 21, 2025).

²⁰⁴ [Decision on PacifiCorp 2023-2025 Base WMP](#) (Feb. 12, 2024), p. 89
(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56309&shareable=true>, accessed Oct. 16, 2024).

²⁰⁵ [PacifiCorp 2025 WMP Update R2](#) (clean) (Jan. 17, 2025), p. 43
(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57821&shareable=true>, accessed Jan. 21, 2025).

8.2.2 New or Discontinued Programs

In its 2025 WMP Update, PacifiCorp did not report any new or discontinued programs related to the vegetation management and inspections section of its 2023-2025 Base WMP.

8.2.3 Targets, Objectives, and Projected Expenditures

In its 2025 WMP Update, PacifiCorp provided quarterly targets (end of Q2 and end of Q3) for its four 2025 vegetation management inspection programs, as required by the 2025 WMP Update Guidelines, and two quarterly targets for its 2025 vegetation management QA/QC program.²⁰⁶

Additionally, PacifiCorp provided updates to four end-of-year 2025 targets, two objective completion dates, and two projected expenditures related to the vegetation management and inspections section of its 2023-2025 Base WMP. Energy Safety finds that these reportable updates meet the requirements set forth in the 2025 WMP Update Guidelines.

Specifically, PacifiCorp provided updates to increase four 2025 targets to include its newly-defined HFRA,²⁰⁷ push the completion date for two objectives associated with its QA/QC initiative program (VM-11) from December 2024 to December 2025,²⁰⁸ and increase projected expenditures for pole clearing (VM-05) and vegetation clearance – transmission (VM-07) approximately 42 and 78 percent, respectively.²⁰⁹

8.2.3.1 Energy Safety Evaluation

Quarterly Targets

PacifiCorp's quarterly targets for its 2025 vegetation management inspections are consistent with its quarterly targets for 2023 and 2024 and meet the requirements of the 2025 WMP Update Guidelines.²¹⁰

²⁰⁶ [2025 WMP Update Guidelines](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56254&shareable=true), Section 3 “Quarterly Inspection Targets for 2025,” p. 15 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56254&shareable=true, accessed Apr. 9, 2024).

²⁰⁷ [PacifiCorp 2025 WMP Update R2](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57821&shareable=true) (clean) (Jan. 17, 2025), p. 3 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57821&shareable=true, accessed Jan. 21, 2025).

²⁰⁸ [PacifiCorp 2025 WMP Update R2](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57821&shareable=true) (clean) (Jan. 17, 2025), p. 18 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57821&shareable=true, accessed Jan. 21, 2025).

²⁰⁹ [PacifiCorp 2025 WMP Update R2](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57821&shareable=true) (clean) (Jan. 17, 2025), p. 20 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57821&shareable=true, accessed Jan. 21, 2025).

²¹⁰ [2025 WMP Update Guidelines](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56254&shareable=true), Section 2 “Changes to Approved Targets, Objectives, and Expenditures,” p. 13 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56254&shareable=true, accessed Nov. 26, 2024).

Target Changes

Previously, patrol inspections and post-audit patrol inspections occurred only in the HFTD. In 2025, PacifiCorp will expand these inspections into its newly defined HFRA, leading to a 25 to 30 percent increase in end-of-year target line miles.²¹¹ Energy Safety finds that these updates are consistent with PacifiCorp’s work to mature its risk modeling (i.e., defining the HFRA), and may reduce wildfire risk.

In its 2025 WMP Update, PacifiCorp delayed the completion dates for two objectives for post-audit patrol inspections from December 2024 to Q4 2025.²¹² These objectives are, “Create SME process & procedure for VM database review four times a year” and “Develop audits to provide understanding of the data collection process.”²¹³

The completion of these objectives is dependent on PacifiCorp’s vegetation management database. PacifiCorp is currently developing a new work management system, the GeoDigital database, which will house data from vegetation management work.²¹⁴ The database is expected to be rolled out in early 2025.²¹⁵ PacifiCorp stated that after rolling out the GeoDigital database it “will need to gain experience using the new tool to identify opportunities for improving data integrity and then develop a process to review data collected to minimize error.”²¹⁶ As such, PacifiCorp updated the completion of these objectives from December 2024 to Q4 2025.²¹⁷ Energy Safety finds that PacifiCorp’s updated objective completion dates are supported by the explanation provided.

²¹¹ [PacifiCorp 2025 WMP Update R2](#) (clean) (Jan. 17, 2025), p. 23
(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57821&shareable=true>, accessed Jan. 21, 2025).

²¹² [PacifiCorp 2025 WMP Update R2](#) (clean) (Jan. 17, 2025), pp. 18-19
(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57821&shareable=true>, accessed Jan. 21, 2025).

²¹³ [PacifiCorp 2025 WMP Update R2](#) (clean) (Jan. 17, 2025), pp. 18-19
(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57821&shareable=true>, accessed Jan. 21, 2025).

²¹⁴ [PacifiCorp Response to Data Request OEIS-P-WMP 2024-PC-01](#), Question 1
(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57091&shareable=true>, accessed Aug. 15, 2024).

²¹⁵ [PacifiCorp Response to Data Request OEIS-P-WMP 2024-PC-01](#), Question 1
(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57091&shareable=true>, accessed Aug. 15, 2024).

²¹⁶ [PacifiCorp Response to Data Request OEIS-P-WMP 2024-PC-01](#), Question 1
(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57091&shareable=true>, accessed Aug. 15, 2024).

²¹⁷ [PacifiCorp Response to Data Request OEIS-P-WMP 2024-PC-01](#), Question 1
(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57091&shareable=true>, accessed Aug. 15, 2024).

Expenditure Changes

Energy Safety finds that PacifiCorp appropriately reported the updated projected expenditure pursuant to the 2025 WMP Update Guidelines.²¹⁸ PacifiCorp updated its 2025 projected expenditures for two vegetation management initiatives. PacifiCorp updated Pole clearing (VM-05) from \$374,000 to \$530,000, an increase of \$156,000 or approximately 42 percent.²¹⁹ Similarly, PacifiCorp updated vegetation clearance – transmission (VM-07) from \$1.42 million to \$2.52 million, an increase of \$1.10 million or approximately 78 percent.²²⁰ PacifiCorp attributes the increase in projected expenditures associated with pole clearing to increased labor costs, and the increase in projected expenditures associated with vegetation clearance – transmission to an increase in the number of circuit miles requiring clearing due to the expansion of this initiative activity to its HFRA.^{221, 222}

8.2.3.2 Areas for Continued Improvement

Energy Safety has no new areas for continued improvement for PacifiCorp in vegetation management and inspections. In its 2026-2028 Base WMP, PacifiCorp must report its progress on any existing areas for continued improvement specified in Energy Safety’s Decision on PacifiCorp’s 2023-2025 Base WMP.²²³

8.3 Situational Awareness and Forecasting

In its 2025 WMP Update, PacifiCorp provided six total updates related to the situational awareness and forecasting section of its 2023-2025 Base WMP. The updates PacifiCorp provided related to this section included reporting on one area for continued improvement, reporting one discontinued program, and reporting updates to one target, one objective and two projected expenditures.

²¹⁸ [2025 WMP Update Guidelines](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56254&shareable=true), Section 2 “Changes to Approved Targets, Objectives, and Expenditures,” pp. 13-14 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56254&shareable=true, accessed Nov. 22, 2024).

²¹⁹ [PacifiCorp 2025 WMP Update R2](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57821&shareable=true) (clean) (Jan. 17, 2025), p. 20 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57821&shareable=true, accessed Jan. 21, 2025).

²²⁰ [PacifiCorp 2025 WMP Update R2](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57821&shareable=true) (clean) (Jan. 17, 2025), p. 20 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57821&shareable=true, accessed Jan. 21, 2025).

²²¹ [PacifiCorp 2025 WMP Update R2](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57821&shareable=true) (clean) (Jan. 17, 2025), p. 22 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57821&shareable=true, accessed Jan. 21, 2025).

²²² [PacifiCorp Response to Data Request OEIS-P-WMP_2024-PC-01](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57091&shareable=true), Questions 2 and 3 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57091&shareable=true, accessed Aug. 15, 2024).

²²³ [Decision on PacifiCorp 2023-2025 Base WMP](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56309&shareable=true) (Feb. 12, 2024), pp. 80-91 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56309&shareable=true, accessed Oct. 16, 2024).

8.3.1 2023 Areas for Continued Improvement

PacifiCorp reported its progress on one area for continued improvement in the situational awareness and forecasting section in its 2025 WMP Update.

8.3.1.1 PC-23B-17. Weather Station Maintenance and Calibration

In its Decision on PacifiCorp's 2023-2025 Base WMP, Energy Safety required PacifiCorp to continue to maintain and keep a log of annual maintenance and calibration for each of its weather stations, including the station name, location, and conducted maintenance.²²⁴ Energy Safety required that the log also include the length of time from initiation of a repair ticket to completion, and the corrective maintenance performed to bring the station back into functioning condition.²²⁵

Energy Safety also required PacifiCorp to submit in its 2025 WMP Update documentation indicating the number of weather stations that received annual calibration, and the number of stations that were unable to undergo annual maintenance and/or calibration due to factors such as remote location, weather conditions, customer refusals, environmental concerns, and safety issues.²²⁶ Energy Safety required that the documentation include station name and location, the reason for the inability to conduct maintenance and/or calibration, the length of time since the maintenance and calibration, and the number of attempts made to complete the maintenance and calibration.²²⁷

In its 2025 WMP Update, PacifiCorp provided information detailing the annual calibrations of its weather stations for 2024. PacifiCorp sent this information in its Quarterly Data Report to Energy Safety under its maintenance: weather station initiative (MA-01).²²⁸ PacifiCorp also stated that since 2023 it conducted weather station maintenance on all stations, with no incomplete locations.²²⁹

²²⁴ [Decision on PacifiCorp 2023-2025 Base WMP](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56309&shareable=true) (Feb. 12, 2024), pp. 88-89 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56309&shareable=true, accessed Oct. 16, 2024).

²²⁵ [Decision on PacifiCorp 2023-2025 Base WMP](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56309&shareable=true) (Feb. 12, 2024), pp. 88-89 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56309&shareable=true, accessed Oct. 16, 2024).

²²⁶ [Decision on PacifiCorp 2023-2025 Base WMP](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56309&shareable=true) (Feb. 12, 2024), pp. 88-89 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56309&shareable=true, accessed Oct. 16, 2024).

²²⁷ [Decision on PacifiCorp 2023-2025 Base WMP](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56309&shareable=true) (Feb. 12, 2024), pp. 88-89 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56309&shareable=true, accessed Oct. 16, 2024).

²²⁸ PacifiCorp Response to Data Request OEIS-P-WMP_2024-PC-03, [Question 1](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57215&shareable=true) and [Attachment](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57216&shareable=true) (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57215&shareable=true and https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57216&shareable=true, accessed Nov. 10, 2024).

²²⁹ [PacifiCorp 2025 WMP Update R2](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57821&shareable=true) (clean) (Jan. 17, 2025), p. 44 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57821&shareable=true, accessed Jan. 21, 2025).

PacifiCorp provided complete documentation for maintenance, calibration records, and station photographs for 2023 and 2024, as well as a spreadsheet containing all required information, as detailed above, for 2024.²³⁰

Energy Safety Evaluation

PacifiCorp sufficiently responded to this area for continued improvement; no further reporting is required on this area for continued improvement in PacifiCorp's 2026-2028 Base WMP.

8.3.2 New or Discontinued Programs

In its 2025 WMP Update, PacifiCorp reported discontinuing one existing program related to the situational awareness and forecasting section of its 2023-2025 Base WMP. Energy Safety finds that this update meets the reportable update criteria set forth in the 2025 WMP Update Guidelines.

PacifiCorp reported in its 2025 WMP Update that it is discontinuing its smoke and air quality sensor program (SA-03) due to the technology still being in development and not yet at a stage that would support implementation.²³¹ The currently deployed sensors will be removed, and the program will not continue.²³²

8.3.2.1 Energy Safety Evaluation

PacifiCorp's discontinued smoke and air quality sensor program was a part of the Department of Homeland Security's Smart Cities Internet of Things (SCITI) Lab's wildland fire sensor program.²³³ Because the technology is still being developed and is not ready for implementation, PacifiCorp has chosen to remove the installed sensors and not continue the program further.²³⁴ Given that the sensors' performance is nascent, Energy Safety does not

²³⁰ PacifiCorp Response to Data Request OEIS-P-WMP_2024-PC-03, [Question 1](#) and [Attachment](#) (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57215&shareable=true> and <https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57216&shareable=true>, accessed Nov. 10, 2024).

²³¹ [PacifiCorp 2025 WMP Update R2](#) (clean) (Jan. 17, 2025), p. 25 (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57821&shareable=true>, accessed Jan. 21, 2025).

²³² [PacifiCorp 2025 WMP Update R2](#) (clean) (Jan. 17, 2025), p. 25 (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57821&shareable=true>, accessed Jan. 21, 2025).

²³³ [PacifiCorp 2023-2025 Base WMP R6](#) (clean) (Jan. 17, 2025), p. 241 (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57823&shareable=true>, accessed Jan. 21, 2025).

²³⁴ [PacifiCorp 2025 WMP Update R2](#) (clean) (Jan. 17, 2025), p. 25 (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57821&shareable=true>, accessed Jan. 21, 2025).

oppose the discontinuance of the program. The discontinued program is a reportable update pursuant to the 2025 WMP Update Guidelines.²³⁵

8.3.2.2 Areas for Continued Improvement

Energy Safety has no new areas for continued improvement for PacifiCorp in situational awareness and forecasting.

8.3.3 Targets, Objectives, and Projected Expenditures

In its 2025 WMP Update, PacifiCorp provided updates to one target, one objective, and two projected expenditures related to the situational awareness and forecasting section of its 2023-2025 Base WMP. Energy Safety finds that these reportable updates meet the requirements set forth in the 2025 WMP Update Guidelines.

PacifiCorp provided an update to its 2025 weather forecasting initiative (SA-05) target due to increasing its High-Power Computer Cluster (HPPC) from one HPPC unit to five HPCC units and correspondingly increased the initiative's projected expenditure from \$115,000 to \$670,000 (a 483 percent increase)^{236, 237} This increase in computing capacity will allow PacifiCorp's meteorology team to decrease the time needed to perform analyses on the current and expected changes in weather and fuel conditions. The additional HPPCs will assist in the delivery speed of the weather researching and forecasting (WRF) forecast models as PacifiCorp transitions from a 4-day outlook to a 7-day outlook.²³⁸

PacifiCorp updated the objective completion date for its wildfire detection cameras installation initiative (SA-04).²³⁹ PacifiCorp reported that SA-04, originally forecasted to be completed in November 2025, will now be completed in December 2024.²⁴⁰

²³⁵ [2025 WMP Update Guidelines](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56254&shareable=true), Section 2 "Changes to Approved Targets, Objectives, and Expenditures," p. 13 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56254&shareable=true, accessed Nov. 26, 2024).

²³⁶ [PacifiCorp 2025 WMP Update R2](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57821&shareable=true) (clean) (Jan. 17, 2025), p. 16 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57821&shareable=true, accessed Jan. 21, 2025).

²³⁷ [PacifiCorp 2025 WMP Update R2](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57821&shareable=true) (clean) (Jan. 17, 2025), p. 20 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57821&shareable=true, accessed Jan. 21, 2025).

²³⁸ [PacifiCorp 2025 WMP Update R2](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57821&shareable=true) (clean) (Jan. 17, 2025), p. 17 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57821&shareable=true, accessed Jan. 21, 2025).

²³⁹ [PacifiCorp 2025 WMP Update R2](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57821&shareable=true) (clean) (Jan. 17, 2025), p. 18 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57821&shareable=true, accessed Jan. 21, 2025).

²⁴⁰ [PacifiCorp 2025 WMP Update R2](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57821&shareable=true) (clean) (Jan. 17, 2025), p.18 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57821&shareable=true, accessed Jan. 21, 2025).

PacifiCorp provided an update to its projected expenditure for its weather station maintenance initiative (MA-01).²⁴¹ The \$85,000 increase (26 percent) is due to the increase in material, data, and maintenance costs for preventative maintenance on the increased number of weather stations projected to be installed.²⁴² This annual maintenance ensures that weather stations can provide accurate and calibrated data for PacifiCorp's meteorology team.²⁴³

8.3.3.1 Energy Safety Evaluation

Energy Safety finds that PacifiCorp's reportable updates for increasing the target for its 2025 weather forecasting initiative and projected expenditure were provided in accordance with the 2025 WMP Update Guidelines.²⁴⁴ The increase from one HPCC unit to five units may increase the ability for PacifiCorp to gather, interpret, and translate data resulting in more informed decision-making. More HPCCs may increase PacifiCorp's weather modeling functionality and provide for greater public safety. The increase in the projected expenditure aligns with the increase of one HPCC unit to five.

PacifiCorp significantly reduced the time to complete its wildfire detection camera installation initiative by almost a year. This early completion of additional wildfire detection units online will likely lead to an increased level of situational awareness and public safety.

The increase in projected expenditure for its weather station maintenance initiative may allow for more accurate data collection from the over 100 weather stations utilized for critical decision making and weather modeling. The data provided by these devices is used by the HPCCs discussed in its weather forecasting initiative for greater situational awareness and more accurate modeling.

8.3.3.2 Areas for Continued Improvement

Energy Safety has no new areas for continued improvement for PacifiCorp in situational awareness and forecasting.

²⁴¹ [PacifiCorp 2025 WMP Update R2](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57821&shareable=true) (clean) (Jan. 17, 2025), p. 20 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57821&shareable=true, accessed Jan. 21, 2025).

²⁴² [PacifiCorp 2025 WMP Update R2](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57821&shareable=true) (clean) (Jan. 17, 2025), p. 22 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57821&shareable=true, accessed Jan. 21, 2025).

²⁴³ [PacifiCorp 2023-2025 Base WMP R6](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57823&shareable=true) (clean) (Jan. 17, 2025), p. 174 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57823&shareable=true, accessed Jan. 21, 2025).

²⁴⁴ [2025 WMP Update Guidelines](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56254&shareable=true), Section 2 "Changes to Approved Targets, Objectives, and Expenditures," p. 13 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56254&shareable=true, accessed Nov. 26, 2024).

8.4 Emergency Preparedness

In its 2025 WMP Update, PacifiCorp provided four total updates related to the emergency preparedness section of its 2023-2025 Base WMP. The updates PacifiCorp provided related to this section included reporting required progress on one area for continued improvement and reporting updates to three projected expenditures.

8.4.1 2023 Areas for Continued Improvement

PacifiCorp reported its progress on one area for continued improvement in the emergency preparedness section in its 2025 WMP Update.

8.4.1.1 PC-23B-18. Emergency Resources Availability

In its 2022 Decision on PacifiCorp's 2022 WMP Update, Energy Safety issued an area for continued improvement (PC-22-19) requiring PacifiCorp to provide, in its 2023-2025 Base WMP, an analysis of its response times regarding its emergency resources associated with recent PacifiCorp-reported catastrophic wildfires. This area for continued improvement also required an evaluation of PacifiCorp's deployment and storage of resources within California.²⁴⁵ In its Decision on PacifiCorp's 2023-2025 Base WMP, Energy Safety found that PacifiCorp did not sufficiently address the required progress and therefore required PacifiCorp to provide this analysis and evaluation of emergency resources in its 2025 WMP Update (PC-23B-18).²⁴⁶

In its 2025 WMP Update, PacifiCorp stated that it has fire suppression tools and equipment for use throughout its California service territory; however, these resources are not used for wildfire response but are instead used by field crews for wildfire risk mitigation during "elevated, significant, or extreme" conditions.²⁴⁷ PacifiCorp stated that its preventive mitigation measures and resources include assigning water trucks to accompany field crews during wildfire season; spraying work areas with water in locations with dry vegetation; and supplying crews with basic suppression equipment.²⁴⁸ PacifiCorp also stated that it does not

²⁴⁵ [Decision on PacifiCorp 2022 WMP Update](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53298&shareable=true), p. 95 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53298&shareable=true, accessed Nov. 15, 2024).

²⁴⁶ [Decision on PacifiCorp 2023-2025 Base WMP](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56309&shareable=true) (Feb. 12, 2024), pp. 89-90 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56309&shareable=true, accessed Oct. 16, 2024).

²⁴⁷ [PacifiCorp 2025 WMP Update R2](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57821&shareable=true) (clean) (Jan. 17, 2025), p. 45 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57821&shareable=true, accessed Jan. 21, 2025).

²⁴⁸ [PacifiCorp 2025 WMP Update R2](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57821&shareable=true) (clean) (Jan. 17, 2025), p. 45 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57821&shareable=true, accessed Jan. 21, 2025).

evaluate the deployment or storage of its California resources in relation to response times given that its resources are not used to respond to wildfires.²⁴⁹

Energy Safety Evaluation

While PacifiCorp's 2025 Update states that it does not use its resources for wildfire response, PacifiCorp acknowledged that it does use its resources for proactive and preventative wildfire risk mitigation.²⁵⁰

In its 2026-2028 Base WMP, PacifiCorp must provide an analysis demonstrating the adequacy of its resources for preventing and responding to faults and suppressing ignitions associated with its assets throughout its California service territory to demonstrate that its resources are sufficient for responding to faults or ignitions. PacifiCorp's analysis does not need to address wildfire response, but rather, fault and ignition response.

PacifiCorp must also provide a table similar to its Table 7.4 "List of firefighting equipment and locations"²⁵¹ from its 2022 WMP Update that lists the fire prevention, suppression, and/or firefighting equipment it has available for use in its California service territory. This table must provide equipment description and location information.

Energy Safety has modified the area for continued improvement to provide additional guidance for PacifiCorp. PacifiCorp must respond to this revised area for continued improvement in its 2026-2028 Base WMP.

Section 11 provides all areas for continued improvement for PacifiCorp, including the specific required progress that PacifiCorp must address in its 2026-2028 Base WMP.

8.4.2 New or Discontinued Programs

In its 2025 WMP Update, PacifiCorp did not report any new or discontinued programs related to the emergency preparedness section of its 2023-2025 Base WMP.

8.4.3 Targets, Objectives, and Projected Expenditures

In its 2025 WMP Update, PacifiCorp provided updates to projected expenditures related to the emergency preparedness section of its 2023-2025 Base WMP. Energy Safety finds that these reportable updates meet the requirements set forth in the 2025 WMP Update Guidelines.

²⁴⁹ [PacifiCorp 2025 WMP Update R2](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57821&shareable=true) (clean) (Jan. 17, 2025), p. 45 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57821&shareable=true, accessed Jan. 21, 2025).

²⁵⁰ [PacifiCorp 2025 WMP Update R2](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57821&shareable=true) (clean) (Jan. 17, 2025), p. 45 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57821&shareable=true, accessed Jan. 21, 2025).

²⁵¹ [PacifiCorp 2022 WMP Update \(redlined\) \(July 2022\)](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=52700&shareable=true), p. 223 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=52700&shareable=true, accessed Nov. 1, 2024).

Specifically, PacifiCorp provided updates to projected expenditures for its emergency preparedness plan (EP-01), external collaboration and coordination (EP-02), and customer support in wildfire and PSPS emergencies (EP-05) initiatives.²⁵²

PacifiCorp increased its projected expenditures for its emergency preparedness plan from \$50,000 to \$320,000 due to re-forecasting expenditures to account for its entire emergency management team where previously only a “partial employee” was forecasted.²⁵³ PacifiCorp listed nine emergency management employees that fall under its forecasted expenditures for its emergency preparedness plan.²⁵⁴

PacifiCorp decreased its projected expenditures for its external collaboration and coordination initiative from \$30,000 to \$10,000 after learning the actual expenditures used in performing this initiative were less than originally anticipated.²⁵⁵

PacifiCorp increased its projected expenditures for its customer support in wildfire and PSPS emergencies initiative from \$0 to \$281,000 to manage the increase in customer interactions on its free portable battery and generator rebate programs.²⁵⁶

8.4.3.1 Energy Safety Evaluation

PacifiCorp’s justifications of these updates align its projected 2025 budget with past actuals and reflect an increase in emergency management personnel and expected customer interactions. An increase in personnel and customer engagement should better prepare PacifiCorp for emergency situations. Energy Safety finds PacifiCorp’s provided updates to projected expenditures are appropriate and in accordance with the 2025 WMP Update Guidelines.

8.4.3.2 Areas for Continued Improvement

Energy Safety has no new areas for continued improvement for PacifiCorp in emergency preparedness. In its 2026-2028 Base WMP, PacifiCorp must report its progress on any existing

²⁵² [PacifiCorp 2025 WMP Update R2](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57821&shareable=true) (clean) (Jan. 17, 2025), p. 19 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57821&shareable=true, accessed Jan. 21, 2025).

²⁵³ [PacifiCorp 2025 WMP Update R2](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57821&shareable=true) (clean) (Jan. 17, 2025), p. 20 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57821&shareable=true, accessed Jan. 21, 2025).

²⁵⁴ [PacifiCorp Response to Data Request OEIS-P-WMP 2024-PC-08](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57597&shareable=true), Question 2 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57597&shareable=true, accessed Nov. 8, 2024).

²⁵⁵ [PacifiCorp 2025 WMP Update R2](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57821&shareable=true) (clean) (Jan. 17, 2025), pp. 20-21 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57821&shareable=true, accessed Jan. 21, 2025).

²⁵⁶ [PacifiCorp 2025 WMP Update R2](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57821&shareable=true) (clean) (Jan. 17, 2025), p. 21 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57821&shareable=true, accessed Jan. 21, 2025).

areas for continued improvement specified in Energy Safety's Decision on PacifiCorp's 2023-2025 Base WMP.²⁵⁷

8.5 Community Outreach and Engagement

In its 2025 WMP Update, PacifiCorp provided one total update related to the community outreach and engagement section of its 2023-2025 Base WMP. Related to this section, PacifiCorp reported an update to one projected expenditure.

8.5.1 2023 Areas for Continued Improvement

Energy Safety's Decision on PacifiCorp's 2023-2025 Base WMP²⁵⁸ did not require PacifiCorp to report progress on any areas for continued improvement in the community outreach and engagement section in its 2025 WMP Update. Therefore, PacifiCorp has no reportable updates in this area.

8.5.2 New or Discontinued Programs

In its 2025 WMP Update, PacifiCorp did not report any new or discontinued programs related to the community outreach and engagement section of its 2023-2025 Base WMP.

8.5.3 Targets, Objectives, and Projected Expenditures

In its 2025 WMP Update, PacifiCorp provided an update to one projected expenditure related to the community outreach and engagement section of its 2023-2025 Base WMP. Energy Safety finds that this reportable update meets the requirements set forth in the 2025 WMP Update Guidelines.

Specifically, PacifiCorp provided an update to its engagement with access and functional needs (AFN) populations initiative (CO-02), increasing projected expenditures from \$0 to \$4,000.²⁵⁹ PacifiCorp stated that the increase is for targeted outreach to inform AFN customers of programs available to them as well as eligibility requirements.²⁶⁰ PacifiCorp further explained that this targeted engagement includes outreach to customers enrolled in

²⁵⁷ [Decision on PacifiCorp 2023-2025 Base WMP](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56309&shareable=true) (Feb. 12, 2024), pp. 80-91 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56309&shareable=true, accessed Oct. 16, 2024).

²⁵⁸ [Decision on PacifiCorp 2023-2025 Base WMP](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56309&shareable=true) (Feb. 12, 2024), pp. 80-91 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56309&shareable=true, accessed Oct. 16, 2024).

²⁵⁹ [PacifiCorp 2025 WMP Update R2](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57821&shareable=true) (clean) (Jan. 17, 2025), p. 19 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57821&shareable=true, accessed Jan. 21, 2025).

²⁶⁰ [PacifiCorp 2025 WMP Update R2](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57821&shareable=true) (clean) (Jan. 17, 2025), p. 20 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57821&shareable=true, accessed Jan. 21, 2025).

its California Alternate Rates for Energy (CARE), free portable battery, and generator rebate programs.²⁶¹

8.5.3.1 Energy Safety Evaluation

Energy Safety finds PacifiCorp's update to the projected expenditure meets the reportable update criteria set forth in the 2025 WMP Update Guidelines.²⁶² The increased projected expenditures may also help foster more tailored outreach to PacifiCorp's AFN customers.

8.5.3.2 Areas for Continued Improvement

Energy Safety has no new areas for continued improvement for PacifiCorp in community outreach and engagement.

²⁶¹ [PacifiCorp Response to Data Request OEIS-P-WMP 2024-PC-08](https://efiling.energy.ca.gov/eFiling/Getfile.aspx?fileid=57597&shareable=true), Question 3 (https://efiling.energy.ca.gov/eFiling/Getfile.aspx?fileid=57597&shareable=true, accessed Nov. 8, 2024).

²⁶² [2025 WMP Update Guidelines](https://efiling.energy.ca.gov/eFiling/Getfile.aspx?fileid=56254&shareable=true), pp. 13-14 (https://efiling.energy.ca.gov/eFiling/Getfile.aspx?fileid=56254&shareable=true, accessed May 6, 2024).

9. Public Safety Power Shutoff

In its 2025 WMP Update, PacifiCorp did not report any updates to the Public Safety Power Shutoff section of its 2023-2025 Base WMP.

10. PacifiCorp's Process for Continuous Improvement

PacifiCorp did not indicate any substantive changes to the corrective action program sections of its 2023-2025 Base WMP.

In its 2025 WMP Update, PacifiCorp provided an update to one area for continued improvement related to the Lessons Learned section of its 2023-2025 Base WMP. Energy Safety finds that this reportable update met the requirements set forth in the 2025 WMP Update Guidelines. PacifiCorp also stated that it will report on another area for continued improvement related to the Lessons Learned section, PC-23B-20, in its 2026-2028 Base WMP.

10.1 2023 Areas for Continued Improvement

PacifiCorp reported its progress on one area for continued improvement in the lessons learned section in its 2025 WMP Update.

10.1.1 PC-23B-19. Lessons Learned Narratives

In its Decision on PacifiCorp's 2023-2025 Base WMP, Energy Safety required PacifiCorp to provide all information on its lessons learned in both tabular and narrative form, as required by Section 10 of the WMP Technical Guidelines, "Lessons Learned."^{263, 264} It provided the tabular form in its 2023-2025 Base WMP.²⁶⁵

In response, PacifiCorp provided the missing narrative on its lessons learned.

10.1.1.1 Energy Safety Evaluation

PacifiCorp provided the required narrative on its lessons learned in a thorough and categorical manner²⁶⁶ and has thus met the requirements of the WMP Technical Guidelines, "Lessons Learned," and met the requirements of PC-23B-19.

²⁶³ [Energy Safety 2023-2025 Wildfire Mitigation Plan Technical Guidelines](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53286&shareable=true), (Dec. 6, 2022), Section 10, pp. 207-209 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53286&shareable=true, accessed Nov. 17, 2024).

²⁶⁴ [Decision on PacifiCorp 2023-2025 Base WMP](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56309&shareable=true) (Feb. 12, 2024), p. 90 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56309&shareable=true, accessed Nov. 17, 2024).

²⁶⁵ [PacifiCorp 2023-2025 Base WMP R2](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56336&shareable=true), pp. 326-328 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56336&shareable=true, accessed Dec. 12, 2024).

²⁶⁶ [PacifiCorp 2023-2025 Base WMP R6](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57823&shareable=true) (clean) (Jan. 17, 2025), pp. 336-341 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57823&shareable=true, accessed Jan 21, 2025).

PacifiCorp sufficiently responded to this area for continued improvement; no further reporting is required on this area for continued improvement in PacifiCorp's 2026-2028 Base WMP.

10.1.2 PC-23B-20. Lessons Learned from Past Wildfires

In its Decision on PacifiCorp's 2023-2025 Base WMP, Energy Safety required PacifiCorp to provide an update in its 2026-2028 Base WMP on its fire incident tracking database that is used for its analysis of the root causes of its ignitions and PacifiCorp-reported catastrophic wildfires, as well as associated lessons learned.²⁶⁷ Energy Safety required that the update provide information on, and a response to, all required progress listed in Energy Safety's 2022 area for continued improvement PC-22-06.²⁶⁸

PacifiCorp elected to report in its 2025 WMP Update that it will provide an update on its progress on its fire incident tracking database in its 2026-2028 Base WMP.²⁶⁹ PacifiCorp must respond to this area for continued improvement in its 2026-2028 Base WMP.

10.2 Lessons Learned

PacifiCorp reported that one of its updates described in Sections 5 through 9 was informed by the following lesson learned:²⁷⁰

- In its emergency preparedness external collaboration and coordination initiative (EP-02), PacifiCorp reduced its projected expenditure after learning its actual expenditures were 67 percent less than anticipated.²⁷¹ This initiative is used to collaborate and coordinate with public safety partners through one functional exercise, one tabletop exercise, and one workshop to coordinate, collaborate, and prepare for emergencies and PSPS events.²⁷²

²⁶⁷ [Decision on PacifiCorp 2023-2025 Base WMP](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56309&shareable=true) (Feb. 12, 2024), pp. 97-98 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56309&shareable=true, accessed Dec. 15, 2024).

²⁶⁸ [Decision on PacifiCorp 2023-2025 Base WMP](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56309&shareable=true) (Feb. 12, 2024), pp. 97-98 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56309&shareable=true, accessed Dec. 15, 2024).

²⁶⁹ [PacifiCorp 2025 WMP Update R2](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57821&shareable=true) (clean) (Jan. 17, 2025), p. 49 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57821&shareable=true, accessed Jan. 21, 2025).

²⁷⁰ PacifiCorp Response to Data Request OEIS-P-WMP_2024-PC-07, [Question 8](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57522&shareable=true) and [Attachment 3](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57525&shareable=true) (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57522&shareable=true, accessed Nov. 8, 2024; and https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57525&shareable=true, accessed Nov. 8, 2024).

²⁷¹ [PacifiCorp 2025 WMP Update R2](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57821&shareable=true) (clean) (Jan. 17, 2025), p. 22 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57821&shareable=true, accessed Jan. 23, 2025).

²⁷² [PacifiCorp 2023-2025 Base WMP R5](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57393&shareable=true) (clean) (Sep. 20, 2024), pp. 267, 269 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57393&shareable=true, accessed Oct. 3, 2024).

10.3 2024 Maturity Survey Results

PacifiCorp’s response to the 2024 Maturity Survey showed lower projected maturity in numerous sub-capabilities for 2025 and 2026 compared to its response to the same survey in 2023.²⁷³ Energy Safety issued three data requests to PacifiCorp requiring PacifiCorp to explain why it changed its responses from “yes” to “no” in each of these sub-capabilities for the years in question.²⁷⁴ While PacifiCorp did not provide clarity for all changes to its projected maturity, the majority of its lower projected maturity in its 2024 Maturity Survey responses appear result from PacifiCorp:

1. Providing updated responses to reflect the absence of a documented plan to complete the maturity survey milestones;
2. Using a more stringent interpretation of Maturity Survey questions in 2024 than in 2023; or
3. Using more current information.

For the majority of the changed responses, PacifiCorp provided the first reason listed above as its rationale for the change.²⁷⁵ For this rationale, PacifiCorp stated that “it will provide ‘Yes’ responses [to Maturity Survey questions] when it is able to support a ‘Yes’ response with documentation, approved project or program plans, or other materials that provide evidence of the actual or planned completion of the maturity survey milestone.”²⁷⁶

PacifiCorp did not clarify its prior year’s process for responding to the Maturity Survey. It also remains unclear what PacifiCorp’s exact current process is for responding to the Maturity Survey. Based on PacifiCorp’s statements, it appears that PacifiCorp’s reported lower projected maturity for 2025 and 2026 are in part due to a change in PacifiCorp’s internal process for responding to survey questions. PacifiCorp stated that it “expects its approach to

²⁷³ See Appendix F, Figure A-2, p. A-18.

²⁷⁴ Energy Safety Data Requests OEIS-P-WMP_2024-PC-07 Q01-07 (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57529&shareable=true>, accessed Jan. 28, 2025); OEIS-P-WMP_2024-PC-09 Q1-7 Q12 Q14 (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57732&shareable=true>, accessed Jan. 28, 2025); OEIS-P-WMP_2024-PC-09 Q8-Q11, Q13, Q15-Q22 (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57696&shareable=true>, accessed Jan. 28, 2025); OEIS-P-WMP_2024-PC-12 Q01 (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57830&shareable=true>, accessed Jan. 28, 2025); and OEIS-P-WMP_2024-PC-12 Q02-04 (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57818&shareable=true>, accessed Jan. 28, 2025).

²⁷⁵ PacifiCorp Response to Data Request OEIS-P-WMP_2024-PC-12, [Attachment OEIS 12.1-1](#) (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57831&shareable=true>, accessed Jan. 24, 2025).

²⁷⁶ PacifiCorp Response to Data Request OEIS-P-WMP_2024-PC-12, [Attachment OEIS 12.1-1](#) (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57831&shareable=true>, accessed Jan. 24, 2025).

the 2025 Maturity Survey to be similar to its approach to the 2024 survey under which a ‘Yes’ response indicates that the maturity survey milestone is or will be achieved and that supporting documentation or evidence is or will be available to demonstrate completion[.]”²⁷⁷ However, PacifiCorp did not identify the actions that it will take, in light of its lower projected maturity, to ensure that its wildfire risk mitigation capabilities will continue to mature in the future.

10.4 Areas for Continued Improvement

PacifiCorp must continue to improve in the following area and report its progress in its 2026-2028 Base WMP. Additionally, in its 2026-2028 Base WMP, PacifiCorp must report its progress on any existing areas for continued improvements specified in Energy Safety’s Decision on PacifiCorp’s 2023-2025 Base WMP.

10.4.1 Actions Resulting from Reduced Projected Maturity

PacifiCorp’s response to the 2024 Maturity Survey showed lower projected maturity in numerous sub-capabilities for 2025 and 2026 compared to its response to the same survey in 2023. In its 2026-2028 Base WMP, PacifiCorp must describe the actions it has implemented and the actions it plans to implement to ensure that its wildfire risk mitigation capabilities continue to mature.

Section 11 provides all areas for continued improvement for PacifiCorp, including the specific required progress that PacifiCorp must address in its 2026-2028 Base WMP.

²⁷⁷ [PacifiCorp Response to Data Request OEIS-P-WMP_2024-PC-12](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57818&shareable=true), Question 3 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57818&shareable=true, accessed Jan. 31, 2025).

11. Required Areas for Continued Improvement

Energy Safety's WMP evaluations focus on each electrical corporations' strategies for reducing the risk of utility-related ignitions. The list below comprises all of PacifiCorp's areas for continued improvement and the required progress that PacifiCorp must address in its 2026-2028 Base WMP. This includes areas for continued improvement from Energy Safety's Decision on PacifiCorp's 2023-2025 Base WMP.

11.1 Risk Methodology and Assessment

- **PC-25U-01. Proposed Changes to the HFTD**

- Description: PacifiCorp has not demonstrated the differences in risk between its HFRA and HFTD, nor undergone the formal process of getting additional high-risk areas recognized beyond the CPUC-established HFTD.
- Required Progress: In its 2026-2028 Base WMP, PacifiCorp must provide:
 - A process outlining how it compares areas in its HFRA to the current HFTD; and
 - Its plan for submitting a proposed change to the CPUC to modify the CPUC-defined HFTD for any areas that PacifiCorp finds should be prioritized for mitigation efforts and considered for recognition.
- Discussed in Section 6, "Risk Methodology and Assessment."

- **PC-23B-02. Calculating Risk Scores Using 95th Percentile Values**

- Description: PacifiCorp's use of 95th percentile values, as opposed to probability distributions, to aggregate risk scores is not aligned with fundamental mathematical standards and could lead to suboptimal mitigation prioritization decisions.
- Required Progress: In its 2026-2028 Base WMP, PacifiCorp must:
 - Provide a plan with milestones for transitioning from using 95th percentile values to probability distributions in its 2026-2028 Base WMP when aggregating risk scores for the following:
 - Mitigation evaluation.
 - Cost/benefit calculations.
 - Risk ranking.

- If PacifiCorp is unable to transition to using probability distributions, it must:
 - Propose an alternative strategy or demonstrate that its current methodologies are providing accurate outputs for calculating known risk. PacifiCorp must provide concrete validations, including estimations for usage of percentiles and probability distributions where possible. Explain why or how it is unable to move toward the use of probability distributions when calculating and aggregating risk scores. This must include discussion of any existing limitations or potential weaknesses.
 - Provide an explanation for each calculation of risk scores where PacifiCorp is calculating or aggregating risk scores in which percentiles were used.
 - Describe any steps PacifiCorp is taking to explore the use of probability distributions in the future.
- Discussed in Section 6, “Risk Methodology and Assessment.”
- **PC-25U-02. PSPS and Wildfire Risk Trade-Off Transparency**
 - Description: PacifiCorp has not yet developed its PSPS risk assessment within its risk modeling, which is necessary for quantifying and understanding PSPS risk along its system in comparison to wildfire risk.
 - Required Progress: In its 2026-2028 Base WMP, PacifiCorp must:
 - Provide a description of how it plans to quantify and integrate PSPS risk into its overall risk assessment. The plan must demonstrate how PacifiCorp will analyze the trade-offs between PSPS risk and wildfire risk.
 - Provide a plan, timeline, and milestones for implementing PSPS risk calculations into its risk modeling tools. These must include a description of where specifically PSPS risk impacts PacifiCorp’s:
 - Decision making framework.
 - Process for mitigation selection.
 - Prioritization of mitigation initiatives.
 - Discussed in Section 6, “Risk Methodology and Assessment.”

- **PC-25U-03. Independent Review Transparency**

- Description: In response to PC-23B-05, PacifiCorp did not provide a detailed plan for implementing review procedures and contracting with an independent third-party reviewer for its risk model, which is necessary for model validation.
- Required Progress: In its 2026-2028 Base WMP, PacifiCorp must:
 - Provide a detailed plan for implementing new procedures relating to reviewing and validating its wildfire risk models. This plan must be more detailed than the plan PacifiCorp provided in its 2025 WMP Update, and must include:
 - Attachments of any associated procedures.
 - All discrete tasks related to review and validation of PacifiCorp's risk models.
 - Provide a status update regarding PacifiCorp's plan to obtain an independent third-party to review its risk models, including discrete dates for when PacifiCorp will obtain a third-party contractor and when the third-party review will be completed.
 - Provide a plan, timeline, and milestones (include target completion dates) for incorporating any changes to its risk model based on the third-party review. The plan must include a description of any potential complicating factors relating to implementation.
- Discussed in Section 6, "Risk Methodology and Assessment."

11.2 Wildfire Mitigation Strategy Development

- **PC-25U-04. Vendor Fire Risk Model Implementation Milestones and Dates**

- Description: In response to PC-23B-06, PacifiCorp marked some parts of its model implementation as deferred, and other parts of its model implementation as scheduled for 2025 and 2026. Due to these deferrals and timing, PacifiCorp must continue to report updates for its risk modeling implementation, including any associated delays.
- Required Progress: In its 2026-2028 Base WMP, PacifiCorp must:
 - Provide its most recent plan and timeline for risk model implementation, including milestones and associated target completion dates, a detailed breakdown of the components and objectives required to complete a given task, and steps taken while implementation is in progress.
 - Provide an update on any deferred steps listed in Table 6-7 including the reason for any further deferrals.

- Discussed in Section 7, “Wildfire Mitigation Strategy Development.”
- **PC-25U-05. Cross-Utility Collaboration on Best Practices for Inclusion of Climate Change Forecasts in Consequence Modeling, Inclusion of Community Vulnerability in Consequence Modeling, and Utility Vegetation Management for Wildfire Safety**
 - Description: PacifiCorp participated in past Energy Safety-led working groups on these topics and continued to participate in forums mentioned in its 2023 WMP Filing. However, PacifiCorp has not reported on any additional WMP-related collaboration with the other California IOUs as of its 2025 WMP Update filing.
 - Required Progress: In its 2026-2028 Base WMP, PacifiCorp must continue its existing collaboration efforts and demonstrate that it has made efforts to specifically collaborate with PG&E, SDG&E, SCE, BVES, and Liberty, where appropriate and relevant to each IOU’s interests. PacifiCorp must also document how its collaboration efforts with the other California IOUs impacted the WMP initiatives presented in its 2026-2028 Base WMP.

PacifiCorp must also continue to participate in all Energy Safety Safety-organized activities related to best practices for:

 - Inclusion of climate change forecasts in consequence modeling.
 - Inclusion of community vulnerability in consequence modeling.
 - Utility vegetation management for wildfire safety.
 - Discussed in Section 7, “Wildfire Mitigation Strategy Development.”

11.3 Grid Design, Operations, and Maintenance

- **PC-25U-06. QA/QC Pass Rate Targets**
 - Description: In response to PC-23B-09 PacifiCorp did not set QA/QC pass rate targets for detailed and intrusive inspections between 95 and 100 percent, in alignment with its current maturity and the California industry standard due to its contractual QA/QC pass rate requirement established with contracted inspectors.
 - Required Progress: In its 2026-2028 Base WMP, PacifiCorp must:
 - Discuss the outcome of its contract negotiations regarding its QA/QC requirements to reflect appropriate safety outcomes and industry standards.
 - Provide its evaluation of new QA/QC processes.

- Provide a narrative explanation of why PacifiCorp’s 2026-2028 pass rate targets are appropriate given its current maturity and how the pass rates are designed to achieve appropriate safety outcomes.

If PacifiCorp does not increase its pass rate targets for 2026-2028, PacifiCorp must provide:

- Its actual pass rates for each QA/QC program in 2023 and 2024.
 - A list and description of all criteria that result in an inspection failing to pass QA/QC.
 - A table of all inspections in 2023 and 2024 that failed QA/QC containing the following information:
 - Inspection type (detailed, intrusive pole, etc.).
 - Inspection identifier.
 - Inspection date.
 - QA/QC failure reason(s).
 - An analysis demonstrating that PacifiCorp’s 2026-2028 QA/QC process and pass rate targets drive improvement in the quality of its inspections.
- Discussed in 8.1.2, “Asset Inspections.”

- **PC-25U-07. Priority A/Level 1 Remediation and Imminent Threat Designation**

- Description: In response to PC-23B-12, PacifiCorp did not provide a plan to engage a third party to audit all Priority A conditions identified from 2020 to 2023.
- Required Progress: In its 2026-2028 Base WMP, PacifiCorp must:
 - Provide a plan and timeline for a third-party audit, including milestones on all Priority A conditions identified in the HFTD from 2020 to 2023. For each condition, the audit must evaluate:
 - If the condition should have been classified as an imminent threat.
 - If the initially assigned remediation timeframe was appropriate given the condition.
 - If the actual remediation timeframe was appropriate given the condition.
- Discussed in 8.1.2, “Asset Inspections.”

- **PC-25U-08. Asset Management and Enterprise Systems**

- Description: In response to PC-23B-14, PacifiCorp did not discuss how it would migrate data from its legacy mainframe to its new enterprise asset management software suite, nor how it would update the software suite to reflect hardening or repair work.
- Required Progress: In its 2026-2028 Base WMP, PacifiCorp must demonstrate its ability to migrate its asset inventory, inspection, and maintenance data from its legacy mainframe to its new enterprise asset management software suite. PacifiCorp must discuss:
 - Its process to migrate data across systems.
 - Its process to maintain data integrity.
 - Its quality control to confirm migration is complete and accurate.
 - Its process to update the new enterprise asset management system to reflect assets that have changed due to hardening or repair work.
- Discussed in 8.1.3, “Equipment Maintenance and Repair.”

- **PC-25U-09. Continued Monitoring of Enhanced Fire Risk (EFR) Settings**

- Description: In response to PC-23B-15, PacifiCorp stated that it does not currently have a quantitative assessment on the effectiveness or impact of its EFR settings.
- Required Progress: In its 2026-2028 Base WMP, PacifiCorp must provide:
 - The following 2024 data when EFR settings were enabled:
 - Number of outages.
 - Duration of outages.
 - Frequency of outages per circuit.
 - Number of customers impacted.
 - Response time for outages.
 - The most recent annual evaluation of circuits utilizing EFR settings including an evaluation of the impact on reliability, and a description of any short-term mitigation projects identified from the evaluation.
 - A quantitative assessment of the effectiveness and fire risk reduction due to PacifiCorp’s implementation of EFR settings, which considers the number, duration, and frequency of outages; the number of customers impacted; the response time for outages; the number of EFR enabled devices; weather conditions; and other environmental factors.

- A description of how PacifiCorp has implemented best practices from peer IOUs including relay thresholds and settings used by the IOUs to increase reliability while reducing fire risk.
- Discussed in Section 8.1.4, “Grid Operations and Procedures.”

11.4 Vegetation Management and Inspections

• PC-23B-16. Vegetation Management Priority Tagging

- Description: While PacifiCorp sequences its inspections based on risk-related criteria (HFTD tier, last scheduled work, predominant species, etc.), its Red Dot priority tagging system does not adequately communicate varying degrees of priority of work identified during inspections.
- Required Progress: In its 2026-2028 Base WMP, PacifiCorp must provide:
 - Risk-based criteria for determining and assigning priority to work locations, including remediation timelines for each priority level. GO 95, Rule 18(A)(2), and Liberty’s “Work Priority Levels”²⁷⁸ should serve as examples.
 - A plan to operationalize risk-based criteria that includes specific, measurable, relevant, and timebound milestones.
- Discussed in Section 8.2 of Energy Safety’s Decision on PacifiCorp’s 2023-2025 Base WMP.²⁷⁹

11.5 Emergency Preparedness

• PC-25U-10. Emergency Resources for Responding to Faults and Ignitions

- Description: In response to PC-23B-18, PacifiCorp stated that it does not use its emergency resources for wildfire response. As such, PacifiCorp did not provide an analysis of its response times in relation to its emergency resources, nor did PacifiCorp provide an evaluation of the deployment and storage of its emergency resources within California.

However, PacifiCorp acknowledged that it invests in and stages fire suppression tools and equipment for use throughout its California service

²⁷⁸ [Liberty 2023-2025 WMP R2](https://efiling.energy.ca.gov/eFiling/Getfile.aspx?fileid=55765&shareable=true) (Oct. 26, 2023), pp. 231-232 (https://efiling.energy.ca.gov/eFiling/Getfile.aspx?fileid=55765&shareable=true, accessed Nov. 17, 2024).

²⁷⁹ [Decision on PacifiCorp’s 2023-2025 Base WMP](https://efiling.energy.ca.gov/eFiling/Getfile.aspx?fileid=56309&shareable=true) (Feb. 12, 2024), p. 62 (https://efiling.energy.ca.gov/eFiling/Getfile.aspx?fileid=56309&shareable=true, accessed Nov. 7, 2024).

territory for proactive and preventative wildfire risk mitigation.²⁸⁰ While PacifiCorp does not evaluate its resources for wildfire response, it should evaluate its resources for fault and ignition response.

- Required Progress: In its 2026-2028 Base WMP, PacifiCorp must provide:
 - An analysis of its prevention and suppression resources throughout its California service territory. This analysis must demonstrate the adequacy of its resources for preventing and responding to faults and suppressing ignitions associated with its assets.
 - This analysis must cite to and provide PacifiCorp’s internal prevention and suppression written procedure for its field personnel.
 - A table (similar to Table 7.4 “List of firefighting equipment and locations” from PacifiCorp’s 2022 WMP Update)²⁸¹ that lists the fire prevention, suppression, and/or firefighting equipment it has available for use in its California service territory for fault and ignition response. This table must provide equipment description and location information.
- Discussed in Section 8.4, “Emergency Preparedness.”

11.6 Lessons Learned

• PC-23B-20. Lessons Learned from Past Wildfires

- Description: In response to a 2022 area for continued improvement (PC-22-06), PacifiCorp states that it is planning to implement fire incident tracking and expects to perform trend and root cause analysis for ignitions by the end of 2024. Given this timeline, PacifiCorp has not yet investigated the causes of its ignitions or PacifiCorp-reported wildfires and does not provide any associated lessons learned within its WMP.
- Required Progress: In its 2026-2028 Base WMP, PacifiCorp must provide an update on its fire incident tracking database as it relates to PacifiCorp’s analysis of the root causes of its ignitions and PacifiCorp-reported catastrophic wildfires as well as associated lessons learned. This update must provide

²⁸⁰ [PacifiCorp 2025 WMP Update R2](https://efiling.energy.ca.gov/eFiling/Getfile.aspx?fileid=57821&shareable=true) (clean) (Jan. 17, 2025), p. 45 (https://efiling.energy.ca.gov/eFiling/Getfile.aspx?fileid=57821&shareable=true, accessed Jan. 21, 2025).

²⁸¹ [PacifiCorp 2022 WMP Update](https://efiling.energy.ca.gov/eFiling/Getfile.aspx?fileid=56804&shareable=true) (Jul. 18, 2022), p. 229 (https://efiling.energy.ca.gov/eFiling/Getfile.aspx?fileid=56804&shareable=true, accessed Nov. 1, 2024).

information on and a response to all required progress listed in Energy Safety's 2022 area for continued improvement PC-22-06.²⁸²

- Discussed in Section 10.1 of Energy Safety's Decision on PacifiCorp's 2023-2025 Base WMP.²⁸³

11.7 Maturity Survey Responses

- **PC-25U-11. Actions Resulting from Reduced Projected Maturity**

- Description: PacifiCorp's response to the 2024 Maturity Survey showed lower projected maturity in numerous sub-capabilities for 2025 and 2026 compared to its response to the same survey in 2023.
- Required Progress: In its 2026-2028 Base WMP, PacifiCorp must describe the actions it has implemented and the actions it plans to implement to ensure that its wildfire risk mitigation capabilities continue to mature throughout the 2026-2028 WMP cycle, based on lessons learned from the lower projected maturity in its 2024 Maturity Survey response.
- Discussed in Section 10.4.1, "Actions Resulting from Reduced Projected Maturity."

²⁸² [Decision on PacifiCorp's 2022 WMP Update](https://efiling.energy.ca.gov/eFiling/Getfile.aspx?fileid=53298&shareable=true) (Dec. 9, 2022), pp. 88-89 (https://efiling.energy.ca.gov/eFiling/Getfile.aspx?fileid=53298&shareable=true, accessed Nov. 6, 2024).

²⁸³ [Decision on PacifiCorp's 2023-2025 Base WMP](https://efiling.energy.ca.gov/eFiling/Getfile.aspx?fileid=56309&shareable=true) (Feb. 12, 2024), pp. 77-78 (https://efiling.energy.ca.gov/eFiling/Getfile.aspx?fileid=56309&shareable=true, accessed Nov. 7, 2024).

12. Conclusion

PacifiCorp's 2025 WMP Update is approved.

Catastrophic wildfires remain a serious threat to the health and safety of Californians. Electrical corporations, including PacifiCorp, must continue to make progress toward reducing utility-related ignition risk.

Energy Safety expects PacifiCorp to effectively implement its wildfire mitigation activities to reduce the risk of utility-related ignitions and the potential catastrophic consequences if an ignition occurs, as well as to reduce the scale, scope, and frequency of PSPS events.

PacifiCorp must meet the commitments in its WMP and fully address the areas for continued improvement identified within this Decision to ensure it meaningfully reduces utility-related ignition and PSPS risk within its service territory over the plan cycle.

DATA DRIVEN FORWARD-THINKING INNOVATIVE SAFETY FOCUSED



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APPENDICES

APPENDICES

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Appendix A.

Glossary of Terms

Term	Definition
AFN	Access and functional needs
BVES	Bear Valley Electric Service
CAISO	California Independent System Operator
Cal Advocates	The Public Advocates Office at the California Public Utilities Commission
CAL FIRE	California Department of Forestry and Fire Protection
Cal OES	California Governor's Office of Emergency Services
CAP	Corrective action program
CBO	Community-based organization
CDFW	California Department of Fish and Wildlife
CEC	California Energy Commission
CEJA	California Environmental Justice Alliance
CNRA	California Natural Resources Agency
CPUC	California Public Utilities Commission
D.	Prefix to a proceeding number designating a CPUC decision
DR	Data request
DWR	California Department of Water Resources
EBMUD	East Bay Municipal Utility District
EFD	Early fault detection

Term	Definition
EPUC	Energy Producers and Users Coalition
EVM	Enhanced vegetation management
FERC	Federal Energy Regulatory Commission
FPI	Fire potential index
FWI	Fire weather index
GFN	Ground-fault neutralizers
GIS	Geographic information systems
GO	General order
GPI	Green Power Institute
GRC	General rate case
HD	High definition
HFRA	High Fire Risk Area
HFTD	High fire threat district
HWT or Horizon West	Horizon West Transmission
I.	Prefix to a proceeding number designating a CPUC Order Instituting Investigation (OII)
ICS	Incident command system or structure
IOU	Investor-owned utility
IR	Infrared
ISA	International Society of Arboriculture
ITO	Independent transmission owner
kV	Kilovolt

Term	Definition
Liberty	Liberty Utilities
LiDAR	Light detection and ranging
Maturity Model	Electrical Corporation Wildfire Mitigation Maturity Model
Maturity Survey	Electrical Corporation Wildfire Mitigation Maturity Survey
MAVF	Multi-attribute value function
MBL	Medical Baseline
MGRA	Mussey Grade Road Alliance
ML	Machine learning
NDVI	Normalized difference vegetation index
NERC	North American Electric Reliability Corporation
NFDRS	National Fire Danger Rating System
NOD	Notice of defect
NOV	Notice of violation
OCM	Overhead circuit miles
OEIS or Energy Safety	Office of Energy Infrastructure Safety
PG&E	Pacific Gas and Electric Company
PoF	Probability of failure
PoI	Probability of ignition
PRC	Public Resources Code
PSPS	Public Safety Power Shutoff

Term	Definition
Pub. Util. Code or PU Code	Public Utilities Code
QA	Quality assurance
QC	Quality control
QDR	Quarterly Data Report
R.	Prefix to a proceeding number designating a CPUC rulemaking
RAMP	Risk Assessment and Mitigation Phase
RCRC	Rural County Representatives of California
REFCL	Rapid earth fault current limiter
RFW	Red Flag Warning
RSE	Risk-spend efficiency
SAWTI	Santa Ana Wildfire Threat Index
SCADA	Supervisory control and data acquisition
SCE	Southern California Edison Company
SDG&E	San Diego Gas & Electric Company
S-MAP	Safety Model Assessment Proceeding, now the Risk-Based Decision-Making Framework Proceeding
SMJU	Small and multijurisdictional utilities
TAT	Tree Assessment Tool
TBC	Trans Bay Cable
TURN	The Utility Reform Network
USFS	United States Forest Service
VM	Vegetation management

Term	Definition
VRI	Vegetation risk index
WMP	Wildfire Mitigation Plan
WRRM	Wildfire Risk Reduction Model
WSAB	Wildfire Safety Advisory Board
WUI	Wildland-urban interface

Appendix B.

Status of 2023 Areas for Continued Improvement

Energy Safety's 2023 Decision¹ for PacifiCorp identified areas for continued improvement and associated required progress. Areas for continued improvement are where PacifiCorp must continue to improve its wildfire mitigation capabilities. As part of the 2025 WMP Update evaluation process, Energy Safety reviewed the progress reported by PacifiCorp on areas for continued improvement that Energy Safety required progress on by the 2025 WMP Update. Energy Safety is satisfied that PacifiCorp has made sufficient progress in all the identified areas for continued improvement.

PacifiCorp's 2023 areas for continued improvement that Energy Safety required progress on by the 2025 WMP Update are listed in Table A-1. The status column indicates whether each has been fully addressed. If not, the column notes where to find more information in this Decision.

¹ [Decision on PacifiCorp 2023-2025 Base WMP](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56309&shareable=true) (Feb. 12, 2024), pp. 80-91
(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56309&shareable=true>, accessed Oct. 16, 2024).

Table A-1. PacifiCorp 2023 Areas for Continued Improvement

ID	Title	Status
PC-23B-01 (PC-23-01)	Cross-Utility Collaboration on Risk Model Development	PacifiCorp sufficiently addressed the required progress.
PC-23B-02 (PC-23-02)	Calculating Risk Scores Using 95th Percentile Values	PacifiCorp did not sufficiently address the required progress. For related areas for continued improvement, see Sections 6.2.2 and 11 of this Decision.
PC-23B-03 (PC-23-03)	PSPS and Wildfire Risk Trade-Off Transparency	PacifiCorp did not sufficiently address the required progress. For related areas for continued improvement, see Sections 6.2.2 and 11 of this Decision.
PC-23B-04 (PC-23-04)	Collaboration Between Vendor and Utility Risk Teams	PacifiCorp sufficiently addressed the required progress.
PC-23B-05 (PC-23-05)	Independent Review Plan Transparency	PacifiCorp did not sufficiently address the required progress. For related areas for continued improvement, see Sections 6.2.2 and 11 of this Decision.
PC-23B-06 (PC-23-06)	Vendor Fire Risk Model Implementation Milestones and Dates	PacifiCorp did not sufficiently address the required progress. For related areas for continued improvement, see Sections 7.1.1 and 11 of this Decision.

ID	Title	Status
PC-23B-07 (PC-23-07)	Cross-Utility Collaboration on Best Practices for Inclusion of Climate Change Forecasts in Consequence Modeling, Inclusion of Community Vulnerability in Consequence Modeling, and Utility Vegetation Management for Wildfire Safety	PacifiCorp did not sufficiently address the required progress. For related areas for continued improvement, see Sections 7.1.2 and 11 of this Decision.
PC-23B-08 (PC-23-08)	Covered Conductor Installation Progress	PacifiCorp sufficiently addressed the required progress.
PC-23B-09 (PC-23-09)	QA/QC Pass Rate targets for Rural Areas	PacifiCorp did not sufficiently address the required progress. For related areas for continued improvement, see Sections 8.1.2 and 11 of this Decision.
PC-23B-10 (PC-23-10)	Covered Conductor Inspections and Maintenance	PacifiCorp sufficiently addressed the required progress.
PC-23B-11 (PC-23-11)	Distribution Detailed Inspection Frequency	PacifiCorp sufficiently addressed the required progress.
PC-23B-12 (PC-23-12)	Priority A/Level 1 Remediation and Imminent Threat Designation	PacifiCorp did not sufficiently address the required progress. For related areas for continued improvement, see Sections 8.1.2 and 11 of this Decision.
PC-23B-13 (PC-23-13)	Priority A/Level 1 Condition Remediation Delays	PacifiCorp sufficiently addressed the required progress.

ID	Title	Status
PC-23B-14 (PC-23-14)	Asset Management and Enterprise Systems	PacifiCorp did not sufficiently address the required progress. For related areas for continued improvement, see Sections 8.1.3.1 and 11 of this Decision.
PC-23B-15 (PC-23-15)	Continued Monitoring of Enhanced Fire Risk (EFR) Settings	PacifiCorp did not sufficiently address the required progress. For related areas for continued improvement, see Sections 8.1.4.1 and 11 of this Decision.
PC-23B-17 (PC-23-17)	Weather Station Maintenance and Calibration	PacifiCorp sufficiently addressed the required progress.
PC-23B-18 (PC-23-18)	Emergency Resources Availability	PacifiCorp did not sufficiently address the required progress. For related areas for continued improvement, see Sections 8.4.1.1 and 11 of this Decision.
PC-23B-19 (PC-23-19)	Lessons Learned Narratives	PacifiCorp sufficiently addressed the required progress.

Appendix C.

Stakeholder Data Request Responses Used in WMP Evaluation

Energy Safety appreciates stakeholder involvement in the WMP evaluation process. The following stakeholder data requests and responses from electrical corporations were cited in this Decision.

CAL ADVOCATES DATA REQUEST:
2023WMP-08 (CAL ADVOCATES 8.2)²
PACIFICORP RESPONSE

Date Received: May 25, 2023
Date Submitted: May 31, 2023

QUESTION

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

² PacifiCorp response to [Cal Advocates Data Request 8.2](https://www.pacificorp.com/content/dam/pcorp/documents/en/pacificorp/wildfire-mitigation/responses-issued/PacifiCorp_Response_CalAdvocates-PacifiCorp-2023WMP-8.2.pdf)
(https://www.pacificorp.com/content/dam/pcorp/documents/en/pacificorp/wildfire-mitigation/responses-issued/PacifiCorp_Response_CalAdvocates-PacifiCorp-2023WMP-8.2.pdf, accessed Nov. 7, 2024).

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.

RESPONSE

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

CAL ADVOCATES DATA REQUEST:
2025WMP-03 (CAL ADVOCATES 3.9)³
PACIFICORP RESPONSE
Date Received: July 18, 2024
Date Submitted: July 23, 2024

QUESTION

PacifiCorp's Asset Management and Inspections – PacifiCorp states the following in its 2025 WMP update on p. 180:

“In response to PC 23-12, in 2024, to update the imminent threat condition code, procedures were developed to be able to capture the imminent threat conditions at the time of identification along with entering the data into the official system of record, Facility Point Inspection (FPI). All policies and procedures have been updated and training materials are currently being updated to reflect new policies. Starting in 2025, all level 1 conditions will be tracked separately from priority A conditions.”

- (a) Please provide the procedures PacifiCorp has developed to capture the imminent threat conditions.
- (b) Please explain why level 1 conditions will be tracked separately from priority A conditions.
- (c) Please specify how PacifiCorp will differentiate A priority conditions that are “imminent” from “non-imminent” threat conditions.

RESPONSE

- (a) PacifiCorp created a new priority code for imminent threat conditions. The new priority code is referenced as I-priority. This new priority code is in addition to PacifiCorp's traditional A/B/C priority codes. Prior to this change, imminent threat conditions were recorded and documented as A-priorities, which captured both imminent threat conditions and other high-risk conditions that were not deemed an imminent threat. PacifiCorp's Asset Management policy 192 was updated to reflect the new priority code, the Facility Point Inspection (FPI) system along with inspection mobile tools were modified such that inspectors can record the new priority code. PacifiCorp's Procedure 069 was also modified to include descriptions, along with example photos of imminent threat conditions. Inspection training materials are also being updated to reflect the new priority code.

³ PacifiCorp response to [Cal Advocates Data Request 3.9](https://www.pacificorp.com/content/dam/pcorp/documents/en/pacificorp/wildfire-mitigation/responses-issued/CalAdvocates_3.9.docx)
(https://www.pacificorp.com/content/dam/pcorp/documents/en/pacificorp/wildfire-mitigation/responses-issued/CalAdvocates_3.9.docx, accessed Nov. 7, 2024).

- (b) PacifiCorp separated Level 1 conditions from “A” priorities because not all “A” priorities are considered an imminent threat. Level 1 priorities will be documented as “I” priorities. Level 2 priorities will be documented as either “A” or “B” priorities. PacifiCorp will continue the use of “A” and “B” priorities for the intent of correcting some Level 2 conditions sooner than others. Please refer to PacifiCorp’s Asset Management Policy 192 for more details; a copy of which is provided with the Company’s response to CalAdvocates Data Request 3.8.
- (c) In accordance with the updated PacifiCorp Asset Management Policy 192, imminent threat will be differentiated from “A” priorities as follows:
- **Priority I** – Conditions where there’s an imminent threat to safety or reliability with a high probability of significant impact. “I” priorities align with General Order (GO) 95 Level 1 priority levels (GO95-18-B-1-a). These conditions pose a significant present threat to human life or property and corrective action shall be taken immediately, either by fully repairing or by temporarily repairing and reclassifying the condition to a lower priority.
 - **Priority A** – Conditions where there’s moderate to high risk of potential impact to safety or reliability but are not imminent and do not require immediate repair. “A” priorities align with GO95 Level 2 priorities (GO95-18-B-1-a).

Appendix D.

Stakeholder Comments on the 2025 WMP Updates

Energy Safety invited stakeholders, including members of the public, to provide comments on the electrical corporations' 2025 WMP Updates. Opening comments on Group 2 WMPs were due on August 12, 2024, and reply comments were due on August 22, 2024. Comments received on the 2025 WMP Updates can be viewed in the 2023-2025 Wildfire Mitigation Plan (2023-2025-WMPs) docket log.

The following individuals and organizations submitted comments that Energy Safety considered in this Decision:

- California Department of Fish and Wildlife (CDFW)
- Rural County Representatives of California (RCRC)
- The Green Power Institute (GPI)
- The Public Advocates Office at the California Public Utilities Commission (Cal Advocates)

Energy Safety also invited stakeholders, including members of the public, to provide comments on PacifiCorp's resubmitted 2025 WMP Update. Comments were due on October 2, 2024, and reply comments were due on October 7, 2024.

No comments were received on PacifiCorp's resubmitted 2025 WMP Update.

Energy Safety concurred with and incorporated the following stakeholder comments into Energy Safety's findings on PacifiCorp's 2025 WMP Update:

- Cal Advocates
 - Energy Safety should require PacifiCorp to provide a quantitative assessment of the effectiveness of EFR settings implementation that would consider the number of customers impacted.
- GPI
 - PacifiCorp's 2025 WMP Update filing package fails to meet reporting standards and must be revised for internal consistency, including corrected tables and figures, and revision numbers.
 - PacifiCorp must ensure comprehensive redlined changes in revised WMP filings. A resubmittal should be required of both its 2025 WMP and its 2023-2025 WMP filing to include all technical corrections with clear redlining.

- PacifiCorp should align its Update and 2023-2025 redlined Base WMP for its transmission intrusive pole inspection targets in Table 8-4.
- PacifiCorp must address gaps in its Vegetation Management QA/QC program (VM-11), including extending it to HFRA and must require PacifiCorp to include trackable completion date (in place of “deferred”).
- Update and re-issue PC-23B-02, Calculating Risk Scores Using 95th Percentile Values, to re-scope the required progress for completion and add the requirement to provide the vendor’s plan and timeline.
- For PC-23B-03, PSPS and Wildfire Risk Trade-Off Transparency, PacifiCorp should be continued to address delays in its PSPS risk model and provide a plan with milestones.
- For PC-23-05, Independent Review Plan Transparency, PacifiCorp should report on its progress for implementing policies and procedures for reviewing internal planning models and expedite its third-party planning risk model review timeline.
- For PC-23B-09, QA/QC Pass Rate Targets for Rural Areas, PacifiCorp should align QA/QC pass rates with industry standards and a contract re-negotiation to meet required standards.
- For PC-23B-12, Priority A/Level 1 Remediation and Imminent Threat Designation, PacifiCorp must revise its definitions and timelines for Level 1 priority remediation including third-party audit milestones.
- RCRC
 - PacifiCorp must optimize fast-trip settings to address high-outage circuits and reliability issues.

Appendix E.

Stakeholder Comments on the Draft Decision

Energy Safety invited stakeholders, including members of the public, to provide comments on Energy Safety's draft Decision for PacifiCorp's 2025 WMP Update, published on February 11, 2025. Opening comments on the draft Decision were due on March 17, 2025, and reply comments were due on March 27, 2025.

The following individuals and organizations submitted opening comments:

- Green Power Institute (GPI)

Energy Safety did not receive reply comments.

All comments received can be viewed in the 2023-2025 Wildfire Mitigation Plan (2023-2025-WMPs) docket log.

Energy Safety made the following changes to the draft Decision as a result of comments received from stakeholders:

1. GPI commented that PacifiCorp's wildfire risk model does not align with CPUC-approved HFTD update methods and urged revising PC-25U-01, directing PacifiCorp to coordinate with CPUC.
 - a. Energy Safety added language in Section 6.1.2.1, clarifying that the CPUC's process for considering an HFRA is not yet defined. Energy Safety referenced the latest CPUC decision and directed PacifiCorp to outline its plan to begin communicating with the CPUC about its proposed changes to the HFTD. The description of PC-25U-01 was also generalized to show the distinction between the two requirements.
2. GPI commented that unresolved asset management issues from area for continued improvement PC-23B-14 should remain tracked to ensure PacifiCorp reports on its 2023 and 2024 inspection QA/QC pass rate.
 - a. Energy Safety revised Section 8.1.3.1 to indicate that the area for continued improvement is modified rather than resolved.
 - b. Energy Safety added an area for continued improvement in Section 11, requiring PacifiCorp to report on its data migration and update of asset information.

Appendix F.

Maturity Survey Results

Energy Safety's 2023-2025 Electrical Corporation Wildfire Mitigation Maturity Model⁴ (Maturity Model) and Electrical Corporation Wildfire Mitigation Maturity Survey⁵ (Maturity Survey) together provided a quantitative method to assess the maturity of each electrical corporation's wildfire risk mitigation program.

The Maturity Model consists of 37 individual capabilities describing the ability of electrical corporations to mitigate wildfire risk within their service territory. The 37 capabilities are aggregated into seven categories. The seven mitigation categories are:

- A. Risk Assessment and Mitigation Selection
- B. Situational Awareness and Forecasting
- C. Grid Design, Inspections, and Maintenance
- D. Vegetation Management and Inspections
- E. Grid Operations and Protocols
- F. Emergency Preparedness
- G. Community Outreach and Engagement

Maturity levels range from 0 (below minimum requirements) to 4 (beyond best practice). Electrical corporations' responses to the Maturity Survey, listed by mitigation category, are depicted in the figures and tables below.

Figure A-1 displays PacifiCorp's 2024 response to the Maturity Survey across mitigation categories showing minimum and average values. Figure A-2 compares PacifiCorp's 2024 response to the Maturity Survey to its 2023 response to the Maturity Survey, depicting values that increased, decreased, or had no change (indicated by "NC").

⁴ [Energy Safety's 2023-2025 Electrical Corporation Wildfire Mitigation Maturity Model \(revised and adopted Jan. 2024, published Feb. 2024\)](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56256&shareable=true)

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56256&shareable=true>, accessed May 6, 2024).

⁵ [Energy Safety's 2023-2025 Electrical Corporation Wildfire Mitigation Maturity Survey \(adopted Jan. 2024, revised and published Feb. 2024\)](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56306&shareable=true)

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56306&shareable=true>, accessed May 6, 2024).

Figure A-1. PacifiCorp 2024 Response to the 2023-2025 Maturity Survey

		1. Capability				2. Capability				3. Capability				4. Capability				5. Capability				6. Capability			
		2023	2024	2025	2026	2023	2024	2025	2026	2023	2024	2025	2026	2023	2024	2025	2026	2023	2024	2025	2026	2023	2024	2025	2026
A. Risk Assessment and Mitigation Strategy		1. Statistical weather, climate, and wildfire modeling				2. Calculation of wildfire and PSPS risk exposure for societal values				3. Calculation of community vulnerability to wildfire and Public Safety Power Shutoffs (PSPS)				4. Calculation of risk and risk components				5. Risk event tracking and integration of lessons learned				6. Risk-informed wildfire mitigation strategy			
	Minimum of Sub-Cap.	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	
	Average of Sub-Cap.	0.8	0.8	0.8	0.7	1.0	0.9	1.0	0.9	1.6	0.6	1.0	1.0	0.9	0.4	0.7	0.7	0.7	0.9	1.1	1.1	0.1	0.3	0.6	0.6
B. Situational Awareness and Forecasting		7. Ignition likelihood estimation				8. Weather forecasting ability				9. Wildfire spread forecasting				10. Data collection for near-real-time conditions				11. Wildfire detection and alarm systems				12. Centralized monitoring of real-time conditions			
	Minimum of Sub-Cap.	0.0	0.0	1.0	1.0	0.0	0.0	0.0	0.0	0.0	1.0	1.0	1.0	0.0	1.0	2.0	2.0	0.0	1.0	1.0	2.0	0.0	1.0	2.0	4.0
	Average of Sub-Cap.	1.2	1.2	2.1	2.8	0.8	1.5	2.4	3.0	1.7	2.1	2.7	3.1	1.6	2.7	3.0	3.1	2.3	3.0	3.3	3.5	2.0	3.0	3.4	4.0
C. Grid Design, Inspections, and Maintenance		13. Asset inventory and condition database				14. Asset inspections				15. Asset maintenance and repair				16. Grid design and resiliency				17. Asset and grid personnel training and quality							
	Minimum of Sub-Cap.	0.0	0.0	0.0	0.0	1.0	1.0	1.0	1.0	1.0	1.0	1.0	1.0	0.0	0.0	1.0	1.0	0.0	1.0	1.0	1.0				
	Average of Sub-Cap.	1.3	2.0	2.0	2.0	2.3	2.3	2.3	2.3	1.3	1.3	1.3	1.3	0.8	1.2	1.8	2.2	0.5	2.3	2.3	2.8				
D. Vegetation Management and Inspections		18. Vegetation inventory and condition database				19. Vegetation inspections				20. Vegetation treatment				21. Vegetation personnel training and quality											
	Minimum of Sub-Cap.	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0								
	Average of Sub-Cap.	1.3	1.3	1.3	1.8	1.0	0.8	0.8	0.8	1.0	0.3	0.3	0.3	1.0	1.0	1.5	1.5								
E. Grid Operations and Protocols		22. Protective equipment and device settings				23. Incorporation of ignition risk factors in grid control				24. PSPS operating model				25. Protocols for PSPS re-energization				26. Ignition prevention and suppression							
	Minimum of Sub-Cap.	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	1.0	1.0	3.0	3.0	0.0	1.0	1.0	1.0	0.0	0.0	0.0	0.0				
	Average of Sub-Cap.	1.3	1.3	1.3	2.0	0.6	0.6	0.8	0.8	2.8	3.2	3.7	3.7	2.0	2.5	2.7	2.7	0.7	1.0	1.7	1.7				
F. Emergency Preparedness		27. Wildfire and PSPS emergency and disaster preparedness plan				28. Collaboration and coordination with public safety partners				29. Public emergency communication strategy				30. Preparedness and planning for service restoration				31. Customer support in wildfire and PSPS emergencies				32. Learning after wildfires and PSPS incidents			
	Minimum of Sub-Cap.	1.0	1.0	1.0	3.0	0.0	2.0	4.0	4.0	0.0	0.0	0.0	0.0	0.0	1.0	1.0	2.0	1.0	1.0	1.0	1.0	0.0	1.0	2.0	2.0
	Average of Sub-Cap.	1.8	1.8	3.0	3.8	1.0	2.5	4.0	4.0	1.3	1.7	2.5	2.7	1.5	2.2	2.3	3.0	1.0	1.0	1.0	1.0	0.5	1.0	2.0	2.0
G. Community Outreach and Engagement		33. Public outreach and education awareness				34. Public engagement in electrical corporation wildfire mitigation planning				35. Engagement with AFN and socially vulnerable populations				36. Collaboration on local wildfire mitigation planning				37. Cooperation and best practice sharing with other electrical corporations							
	Minimum of Sub-Cap.	2.0	2.0	3.0	3.0	1.0	1.0	4.0	4.0	0.0	1.0	1.0	1.0	1.0	1.0	1.0	1.0	0.0	0.0	2.0	3.0				
	Average of Sub-Cap.	3.0	3.0	3.5	3.5	2.0	2.7	4.0	4.0	1.0	1.7	2.0	2.3	2.0	2.5	2.5	2.5	1.0	1.3	2.7	3.3				

Figure A-2. PacifiCorp Maturity Survey Changes from 2023 to 2024

		1. Capability				2. Capability				3. Capability				4. Capability				5. Capability				6. Capability			
		2023	2024	2025	2026	2023	2024	2025	2026	2023	2024	2025	2026	2023	2024	2025	2026	2023	2024	2025	2026	2023	2024	2025	2026
A. Risk Assessment and Mitigation Strategy		1. Statistical weather, climate, and wildfire modeling				2. Calculation of wildfire and PSPS risk exposure for societal values				3. Calculation of community vulnerability to wildfire and Public Safety Power Shutoffs (PSPS)				4. Calculation of risk and risk components				5. Risk event tracking and integration of lessons learned				6. Risk-informed wildfire mitigation strategy			
	Minimum of Sub-Cap.	NC	NC	-1.0	-1.0	NC	NC	-2.0	-2.0	NC	NC	-1.0	-2.0	NC	NC	-2.0	-2.0	NC	NC	-1.0	-2.0	NC	NC	-2.0	-2.0
	Average of Sub-Cap.	NC	-0.7	-1.3	-2.0	NC	-0.5	-2.0	-2.8	NC	-1.0	-1.9	-2.4	NC	-0.9	-2.7	-2.8	NC	+0.14	-2.3	-2.4	NC	-0.3	-2.0	-2.8
B. Situational Awareness and Forecasting		7. Ignition likelihood estimation				8. Weather forecasting ability				9. Wildfire spread forecasting				10. Data collection for near-real-time conditions				11. Wildfire detection and alarm systems				12. Centralized monitoring of real-time conditions			
	Minimum of Sub-Cap.	NC	NC	NC	-1.0	NC	NC	-1.0	-2.0	NC	NC	-1.0	-2.0	NC	NC	NC	-1.0	NC	NC	NC	NC	NC	NC	NC	NC
	Average of Sub-Cap.	NC	NC	-0.1	-0.3	NC	NC	-0.1	-0.2	NC	NC	-0.3	-0.4	NC	NC	-0.3	-0.4	NC	NC	+0.33	+0.17	NC	NC	+0.4	+0.4
C. Grid Design, Inspections, and Maintenance		13. Asset inventory and condition database				14. Asset inspections				15. Asset maintenance and repair				16. Grid design and resiliency				17. Asset and grid personnel training and quality							
	Minimum of Sub-Cap.	NC	NC	-2.0	-3.0	NC	NC	-1.0	-1.0	NC	NC	-1.0	-1.0	NC	-1.0	-1.0	-1.0	NC	NC	-2.0	-2.0				
	Average of Sub-Cap.	NC	NC	-1.0	-1.8	NC	NC	-1.0	-1.0	NC	NC	-1.5	-1.8	NC	-1.0	-1.3	-1.3	NC	NC	-1.5	-1.0				
D. Vegetation Management and Inspections		18. Vegetation inventory and condition database				19. Vegetation inspections				20. Vegetation treatment				21. Vegetation personnel training and quality											
	Minimum of Sub-Cap.	NC	NC	-2.0	-3.0	NC	-1.0	-1.0	-2.0	NC	NC	-1.0	-2.0	NC	NC	-2.0	-2.0								
	Average of Sub-Cap.	NC	-0.3	-1.8	-1.8	NC	-0.5	-1.5	-2.5	NC	-1.3	-2.0	-3.0	NC	-0.8	-1.3	-1.8								
E. Grid Operations and Protocols		22. Protective equipment and device settings				23. Incorporation of ignition risk factors in grid control				24. PSPS operating model				25. Protocols for PSPS re-energization				26. Ignition prevention and suppression							
	Minimum of Sub-Cap.	NC	NC	-3.0	-3.0	NC	NC	-2.0	-2.0	NC	NC	NC	NC	NC	NC	NC	-1.0	NC	NC	-2.0	-2.0				
	Average of Sub-Cap.	NC	-1.3	-2.2	-1.5	NC	-0.2	-2.4	-2.8	NC	+0.17	-0.2	-0.2	NC	+0.33	-0.2	-0.8	NC	-0.3	-1.0	-1.0				
F. Emergency Preparedness		27. Wildfire and PSPS emergency and disaster preparedness plan				28. Collaboration and coordination with public safety partners				29. Public emergency communication strategy				30. Preparedness and planning for service restoration				31. Customer support in wildfire and PSPS emergencies				32. Learning after wildfires and PSPS incidents			
	Minimum of Sub-Cap.	NC	NC	-3.0	-1.0	NC	NC	+2	+1	NC	NC	-2.0	-2.0	NC	NC	NC	NC	NC	NC	-3.0	-3.0	NC	NC	NC	NC
	Average of Sub-Cap.	NC	NC	-1.0	-0.3	NC	NC	+1.5	+0.5	NC	-0.2	-0.5	-0.5	NC	+0.17	NC	-0.2	NC	NC	-3.0	-3.0	NC	NC	NC	NC
G. Community Outreach and Engagement		33. Public outreach and education awareness				34. Public engagement in electrical corporation wildfire mitigation planning				35. Engagement with AFN and socially vulnerable populations				36. Collaboration on local wildfire mitigation planning				37. Cooperation and best practice sharing with other electrical corporations							
	Minimum of Sub-Cap.	NC	NC	NC	NC	NC	NC	NC	NC	NC	NC	-1.0	-2.0	NC	NC	-3.0	-3.0	NC	-2.0	NC	-1.0				
	Average of Sub-Cap.	NC	NC	NC	NC	NC	+0.33	NC	NC	NC	-0.3	-1.0	-1.0	NC	NC	-1.5	-1.5	NC	-1.3	-0.7	-0.7				