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Exhibit A



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Portland, Oregon 97232

September 17, 2025

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Re: CA 2020-WMPs
SED-01-PacifiCorp 2020 WMP

As previewed in PacifiCorp's Request for Hearing on July 3, 2025, in response to the Safety and Enforcement Division's ("SED") Proposed Administrative Enforcement Order, dated June 3, 2025, PacifiCorp respectfully submits revised responses to certain data requests served by SED regarding PacifiCorp's 2020 Wildfire Mitigation Plan ("WMP").

Please find enclosed PacifiCorp's 1st Revised Responses to CPUC SED Data Requests (CPUC SED 1.3 and 1.4 1st REVISED). Also provided is Attachment CPUC SED 1.4 1st REVISED.

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

Sincerely,

 /s/
Pooja Kishore
Manager, Regulation

CPUC SED Data Request 1.3

Energy Safety found that PacifiCorp replaced 29 poles against a target of 189 poles from the 2020 WMP initiative 5.3.3.6 Targeted Pole Replacements meaning that 160 poles should have been replaced but were not.

- (a) State the budget amount allocated in Your 2020 WMP for the 160 poles were not replaced. Provide all Documents Related to Your answer and state the page number(s) of the relevant section(s) of such Documents.
- (b) State whether any fire(s) occurred in 2020 or 2021 at the 160 locations where such poles were not replaced. Provide all Documents Related to Your answer and state the page number(s) of the relevant section(s) of such Documents.
- (c) State whether PacifiCorp self-reported any non-compliance for the 160 poles that were not replaced; and if so whether such reporting was voluntary or mandatory. Provide all Documents Related to Your answer and state the page number(s) of the relevant section(s) of such Documents.
- (d) State whether PacifiCorp took corrective actions to complete installation of the 160 poles that were not replaced.
 - i. If yes, state the date(s) when PacifiCorp installed such poles.
 - ii. If yes, show whether installation of these covered conductors was required by any commitment in a future WMP or other regulation or requirement. Provide all Documents Related to Your answer and state the page number(s) of the relevant section(s) of such Documents.
 - iii. If no, state the reason why PacifiCorp did not take corrective action.

1st Revised Response to CPUC SED Data Request 1.3

Further to the Company's response to CPUC SED Data Request 1.3 dated February 5, 2024, the Company provides the following revised response to subpart (c):

- (c) PacifiCorp reported in its mandatory Q4 2020 Quarterly Initiative Update (QIU) that it had replaced 29 poles versus the target of 189 poles, and it stated that the initiative was "in progress". PacifiCorp did not reference "non-compliance", "self-reporting" or similar phrasing in its Q4 2020 QIU or elsewhere. Please refer to the Company's response to CPUC SED Data Request 1.2, Attachment CPUC SED 1.2, file "PacifiCorp_2020 Q4 QIU_20210401", cells M9 ("AnnualQuantTarget" = 189), Q9 ("ProjectedQuantProgressQ1-4" = 29), AA9 ("Status" = "In Progress"). To the extent that California Public Utilities Commission (CPUC) Safety and Enforcement

2020-WMPs / PacifiCorp

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SED-01-PacifiCorp 2020 WMP - CPUC SED Data Request 1.3 – 1st Revised

Division (SED) determines that PacifiCorp's spending is relevant to an assessment of compliance, PacifiCorp also stated in its mandatory 2020 Annual Report on Compliance that it had not spent the planned amount for the category of Grid Design and System Hardening initiatives—the category that includes initiative 5.3.3.6—but PacifiCorp did not state the number of poles it had replaced in connection with this initiative or that it had missed its target. Please refer to the Company's response to CPUC SED Data Request 1.2, specifically Attachment CPUC SED 1.2, file "PacifiCorp 2020 WMP Annual Report on Compliance - 033121_FINAL.pdf", specifically page 6.

Despite PacifiCorp's diligent efforts, certain information protected from disclosure by the attorney-client privilege or other applicable privileges or law may have been included in its responses to these data requests. PacifiCorp did not intend to waive any applicable privileges or rights by the inadvertent disclosure of protected information, and PacifiCorp reserves its right to request the return or destruction of any privileged or protected materials that may have been inadvertently disclosed. Please inform PacifiCorp immediately if you become aware of any inadvertently disclosed information.

CPUC SED Data Request 1.4

Energy Safety found that PacifiCorp installed two weather stations instead of a target of 10 from 2020 WMP initiative 5.3.2.1 – Installation of Weather Stations.

- (a) State the budget amount allocated in Your 2020 WMP for the eight weather stations that were not installed. Provide all Documents Related to Your answer and state the page number(s) of the relevant section(s) of such Documents.
- (b) State whether PacifiCorp self-reported any non-compliance with the WMP initiative 5.3.2.1 target; and if so whether such reporting was voluntary or mandatory. Provide all Documents Related to Your answer and state the page number(s) of the relevant section(s) of such Documents.
- (c) State whether PacifiCorp took corrective action to complete installation of the additional eight weather stations.
 - i. If yes, state the date(s) when PacifiCorp installed such weather stations.
 - ii. If yes, show whether installation of these weather stations was required by any commitment in a future WMP or other regulation or requirement. Provide all Documents Related to Your answer and state the page number(s) of the relevant section(s) of such Documents.
 - iii. If no, state the reason why PacifiCorp did not take corrective action.

1st Revised Response to CPUC SED Data Request 1.4

Further to the Company's response to CPUC SED Data Request 1.4 dated February 5, 2024, the Company provides the following revised response to subparts (b) and (c)(ii):

- (b) PacifiCorp reported in its mandatory Q4 2020 Quarterly Initiative Update (QIU) that it had installed two weather stations versus the target of 10. PacifiCorp did not reference "non-compliance", "self-reporting" or similar phrasing in its Q4 2020 QIU or elsewhere. Please refer to the Company's response to CPUC SED Data Request 1.2, Attachment CPUC SED 1.2, file "PacifiCorp_2020 Q4 QIU_20210401", cells M3 ("AnnualQuantTarget" = 10) and Q3 ("ProjectedQuantProgressQ1-4" = 2).

To the extent that the California Public Utilities Commission (CPUC) Safety and Enforcement Division (SED) determines that PacifiCorp's spending is relevant to an assessment of compliance, PacifiCorp's mandatory 2020 Annual Report on Compliance (Please see attachment CPUC SED 1.4 1st REVISED) stated that it was "[r]amping up weather station installation and calibration program; Iterative process

at first to site and ensure data is captured properly”. However, PacifiCorp’s Annual Report did not state the number of weather stations it had installed or that it had missed its target. Please refer to the Company’s response to CPUC SED Data Request 1.2, specifically Attachment CPUC SED 1.2, file “PacifiCorp 2020 WMP Annual Report on Compliance - 033121_FINAL.pdf”, specifically page 6.

(c) Please refer to the Company’s response to subpart (ii) below:

- ii. PacifiCorp’s 2021 Wildfire Mitigation Plan (WMP), page 115, stated that it would install a total of 20 weather stations in 2021. This target included the eight non-completed weather stations remaining from the 2020 WMP. Please refer to PacifiCorp’s 2021 WMP, page 125 (“PacifiCorp intends to complete the installations of the 2020 stations in addition to another 12 stations during 2021”).

Please note that there was a discrepancy in the target number of weather stations within the 2021 WMP. In a table on page 98 of PacifiCorp’s 2021 WMP, PacifiCorp stated that it would complete 22 weather stations by the end of 2021. In Energy Safety’s Annual Report on Compliance, Energy Safety noted the discrepancy but determined that the WMP target was “likely 20 stations”, which was later amended to 21 weather stations via a change order. Energy Safety ARC, Appendix C, page 10 n.11.



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Re: CA 2020-WMPs
SED-02-PacifiCorp 2020 WMP

As previewed in PacifiCorp's Request for Hearing on July 3, 2025, in response to the Safety and Enforcement Division's ("SED") Proposed Administrative Enforcement Order, dated June 3, 2025, PacifiCorp respectfully submits revised responses, attached hereto as Exhibit A, to certain data requests served by SED regarding PacifiCorp's 2020 Wildfire Mitigation Plan ("WMP").

Please find enclosed PacifiCorp's 1st Revised Responses to CPUC SED Data Requests (CPUC SED 2.10 and 2.14 1st REVISED).

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

Sincerely,

 /s/
Pooja Kishore
Manager, Regulation

CPUC SED Data Request 2.10

SED-01 Q4(c) requested information on corrective actions undertaken by PacifiCorp to complete the installation of eight weather stations that were due in 2020 but not installed on time. PacifiCorp's response stated that these eight weather stations were included in the Company's 2021 WMP and installed with the final installation occurring on May 5, 2021.

- (a) Provide the number of weather stations committed in PacifiCorp's 2021 and 2022 WMPs. Provide all Documents Related to Your answer and state the page number(s) of the relevant section(s) of such Documents.
- (b) State whether PacifiCorp's 2021 WMP targets included installing weather stations included in PacifiCorp's 2020 WMP but not installed in 2020. Explain why or why not. Provide all Documents Related to Your answer and state the page number(s) of the relevant section(s) of such Documents.

1st Revised Response to CPUC SED Data Request 2.10

Further to the Company's response to CPUC SED Data Request 2.10 dated May 1, 2024, the Company provides the following revised response which replaces, in its entirety, the original response:

- (a) 2021 – The target for weather stations was inconsistent in PacifiCorp's 2021 Wildfire Mitigation Plan (WMP). PacifiCorp's 2021 WMP, page 115, stated that it would install a total of 20 weather stations in 2021. In a table on page 98 of PacifiCorp's 2021 WMP, PacifiCorp stated that it would complete 22 weather stations by the end of 2021. In Energy Safety's Annual Report on Compliance, Energy Safety noted the discrepancy but determined that the WMP target was "likely 20 stations," which was later amended to 21 weather stations via a change order. Energy Safety ARC, Appendix C, page 10 n.11.

2022 – 50 weather stations – please refer to section 5.2, page 115 of PacifiCorp's 2022 WMP (Revised July 15, 2022).

- (b) PacifiCorp's 2021 WMP targets for installing weather stations included 2020 WMP installations planned but not installed in 2020, as explained in section 7.3.2.4, page 125 of PacifiCorp's 2021 WMP ("PacifiCorp intends to complete the installations of the 2020 stations in addition to another 12 stations during 2021.").

CPUC SED Data Request 2.14

PacifiCorp stated in response to SED-01 Q8(c) regarding 2020 WMP Initiative 5.3.5.20 that, "PacifiCorp mandatorily self-reported the non-compliance in section C page 6 of the Company's 2020 Annual Report on Compliance. Please refer to the Company's response to CPUC SED Data Request 1.2, specifically Attachment CPUC SED 1.2, file "PacifiCorp 2020 WMP Annual Report on Compliance - 033121_FINAL."

- (a) Quote any section of the Company's 2020 Annual Report on Compliance that states that PacifiCorp did not comply with the 2020 WMP Initiative 5.3.5.20 target of 3,195 miles completed.
- (b) If such document does not report non-compliance with the 2020 WMP Initiative 5.3.5.20 target of 3,195 miles completed, explain the basis for PacifiCorp's response to SED-01 Q8(c).

1st Revised Response to CPUC SED Data Request 2.14

Further to the Company's response to CPUC SED Data Request 2.14 dated May 15, 2024, the Company provides the following revised response to subpart (a) as follows:

- (a) PacifiCorp's 2020 Annual Report on Compliance was incorrectly referenced in the Company's response to CPUC SED Date Request 1.2. PacifiCorp did not specifically report in the annual report on compliance that initiative 5.3.2.5.20: Vegetation management to achieve clearances arounds electric lines and equipment was incomplete.



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September 17, 2025

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Re: CA 2020-WMPs
SED-03-PacifiCorp 2020 WMP

As previewed in PacifiCorp's Request for Hearing on July 3, 2025, in response to the Safety and Enforcement Division's ("SED") Proposed Administrative Enforcement Order, dated June 3, 2025, PacifiCorp respectfully submits revised responses, attached hereto as Exhibit A, to certain data requests served by SED regarding PacifiCorp's 2020 Wildfire Mitigation Plan ("WMP").

Please find enclosed PacifiCorp's 1st Revised Responses to CPUC SED Data Requests (CPUC SED 3.4 and 3.5 1st REVISED).

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

Sincerely,

 /s/
Pooja Kishore
Manager, Regulation

CPUC SED Data Request 3.4

Provide a copy of the results of the two most recent Detailed Inspections prior to September 18, 2020, that PacifiCorp conducted on Circuit 5G41. Provide all relevant documents and state the page number(s) of the relevant section(s) of such Documents.

1st Revised Response to CPUC SED Data Request 3.4

Further to the Company's response to CPUC SED Data Request 3.4 dated July 1, 2024, the Company provides the following revised response to provide further clarification to its original response:

PacifiCorp assumes that this data request refers to Initiative 5.3.4.1, asset management detailed inspections of distribution electric lines and equipment, not Initiative 5.3.5.2, vegetation management detailed inspections of distribution electric lines and equipment. With respect to asset management inspections, PacifiCorp does not inspect distribution facility points by circuit; rather PacifiCorp inspects by a one square mile grid known as a "section." A section is 1/36 of a mapstring or township. Both together are known as a mapstring-section. Circuit 5G41 covers five mapstrings or 48 mapstring-sections. Based on the foregoing clarification, the Company responds as follows:

The entire circuit would have been inspected on different cycles over the years. For example, portions of 5G41 could each be on a separate Detail Inspections (DETAIL), Pole, Test and Treat (PTT) or visual assurance (VA) cycle.

Please refer to Attachment CPUC SED 3.4 and specifically tab "STRUCTURES," which provides a list of all structures on circuit 5G41. Note: a "detailed" inspection can be either DETAIL or PTT. On the far right of the worksheet, there are two columns, column P, "Detailed 1" and column Q, "Detailed 2." "Detailed 1" will show the first detailed inspection date prior to September 18, 2020. "Detailed 2" will show the second detailed inspection date prior to September 18, 2020. Please refer to Attachment CPUC SED 3.4 and specifically tab, "CONDITIONS" which provides all conditions found on a given facility point on the exact inspection date noted in the columns "Detailed 1" or "Detailed 2" in tab, "STRUCTURES."

CPUC SED Data Request 3.5

Provide a copy of the results of the two most recent Patrol Inspections prior to September 18, 2020, that PacifiCorp conducted on Circuit 5G41. Provide all relevant documents and state the page number(s) of the relevant section(s) of such Documents.

1st Revised Response to CPUC SED Data Request 3.5

Further to the Company's response to CPUC SED Data Request 3.5 dated July 1, 2024, the Company provides the following revised response to provide further clarification to the original response:

PacifiCorp assumes that this data request refers to Initiative 5.3.4.11, asset management patrol inspections of distribution electric lines and equipment, not Initiative 5.3.5.11, vegetation management patrol inspections of distribution electric lines and equipment. Based on the foregoing clarification, the Company responds as follows:

Please refer to Attachment CPUC SED 3.5 which provides a list of all structures on circuit 5G41. On the far right of the worksheet, there are two columns "Patrol 1" and "Patrol 2." "Patrol 1" will show the first visual assurance inspection date prior to September 18, 2020. "Patrol 2" will show the second visual assurance inspection date prior to September 18, 2020. There were no conditions found via visual assurance inspections during this time.

October 3, 2025

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Re: CA 2020-WMPs
SED-01-PacifiCorp 2020 WMP

As previewed in PacifiCorp's Request for Hearing on July 3, 2025, in response to the Safety and Enforcement Division's ("SED") Proposed Administrative Enforcement Order, dated June 3, 2025, PacifiCorp respectfully submits revised responses to certain data requests served by SED regarding PacifiCorp's 2020 Wildfire Mitigation Plan ("WMP").

Please find enclosed PacifiCorp's 1st Revised Responses to CPUC SED Data Requests 1.2, and 1.5-1.8. Also included are Attachments CPUC SED 1.6-1, 1.6-2 and 1.7 1st Revised.

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

Sincerely,

 /s/
Pooja Kishore
Manager, Regulation

CPUC SED Data Request 1.2

Energy Safety found that PacifiCorp installed 1.4 miles of covered conductor instead of a 2020 WMP Initiative 5.3.3.3 target of 38-line miles.

- (a) State the budget amount allocated in Your 2020 WMP for installation of the 36.6 miles of covered conductors that were not installed in 2020. Provide all Documents Related to Your answer and state the page number(s) of the relevant section(s) of such Documents.
- (b) State whether PacifiCorp self-reported any non-compliance with the 2020 WMP Initiative 5.3.3.3 target of installing 38-line miles of covered conductors; and if so whether such reporting was voluntary or mandatory. Provide all Documents Related to Your answer and state the page number(s) of the relevant section(s) of such Documents.
- (c) Energy Safety found that "PacifiCorp failed to install covered conductor as planned for the 'Dunsmuir Tie Taps' project, which later experienced an ignition on or near that exact location in 2020." State whether installation of covered conductor in 2020 at this location could have prevented this ignition. Provide all Documents Related to Your answer and state the page number(s) of the relevant section(s) of such Documents.
- (d) Energy Safety found that "PacifiCorp had an ignition (caused by a lightning arrester) in a Tier 3 HFTD area in a location in which it planned to install covered conductor but failed to do so." State whether this lightning arrester would have been replaced as part of the 36.6 miles of covered conductor project that were included in 2020 WMP Initiative 5.3.3.3 but not installed in 2020. Provide all Documents Related to Your answer and state the page number(s) of the relevant section(s) of such Documents.
- (e) State whether PacifiCorp took corrective actions to complete the installation of 38 miles of covered conductors.
 - i. If yes, list the date(s) when PacifiCorp completed the installation of the additional 36.6 miles of covered conductors.
 - ii. If yes, show whether installation of these covered conductors was required by any commitment in a future WMP or other regulation or requirement. Provide all Documents Related to Your answer and state the page number(s) of the relevant section(s) of such Documents.
 - iii. If no, state the reason why PacifiCorp did not take corrective actions to install the remaining 36.6 miles of covered conductor.

1st Revised Response to CPUC SED Data Request 1.2

Further to the Company’s response to CPUC SED Data Request 1.2 dated February 5, 2024, the Company provides the following revised responses to (b) and (e)(i):

- (b) PacifiCorp reported in its mandatory Q4 2020 Quarterly Initiative Update (QIU) that it had completed 1.4 line-miles of construction of covered conductor versus the target of 38 line-miles. PacifiCorp did not reference “non-compliance,” “self-reporting,” or similar phrasing in its Q4 2020 QIU or elsewhere. Please refer to the Company’s original response to CPUC SED Data Request 1.2, Attachment CPUC SED 1.2, file “PacifiCorp_2020 Q4 QIU_20210401,” cells M7 (“AnnualQuantTarget” = 38) and Q7 (“ProjectedQuantProgressQ1-4” = 1.4).

In section C of PacifiCorp’s mandatory Annual Report on Compliance (ARC), PacifiCorp stated that it was “[b]ehind schedule regarding implementation of covered conductor,” but it did not specifically state that it had missed the wildfire mitigation plan (WMP) target. Please refer to the Company’s original response to CPUC SED Data Request 1.2, Attachment CPUC SED 1.2, file “PacifiCorp 2020 WMP Annual Report on Compliance - 033121_FINAL,” page 6.

- (e) To date, PacifiCorp has taken corrective action to complete the installation of 34.23 circuit-miles of the 36.6 circuit-miles of covered conductor planned to be installed in the 2020 WMP that were incomplete at the end of 2020 (38 circuit miles targeted minus 1.4 circuit miles constructed in 2020). Please refer to the Company’s responses to subparts i through iii below:
 - i. PacifiCorp has subsequently constructed 34.23 miles of the 36.6 miles incomplete at the end of 2020. Some of the information provided in the following chart is different from the information provided in PacifiCorp’s original response to CPUC SED Data Request 1.2. The inconsistencies in the data were the result of inconsistencies in the data sources relied on by the author of the original response to CPUC SED Data Request 1.2, as well as some misjudgments about which data to pull from. In revising this response, the Company has relied on what, in its view, are the most definitive data sources for its covered conductor projects: data from its Quarterly Data Reports (QDR) and its Construction Management Software (CMS).

| GhID | Line Miles | Completion Quarter |
|---------|------------|--------------------|
| 6771705 | 1 | 2021 Q2 |

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| GhID | Line Miles | Completion Quarter |
|--------------|--------------|--------------------|
| 8052057 | 0.9 | 2021 Q3 |
| 6771707 | 1.9 | 2021 Q3 |
| 8094878 | 2.4 | 2021 Q4 |
| 8142422 | 0.1 | 2022 Q2 |
| 8179571 | 2.9 | 2022 Q1 |
| 6810400 | 0.4 | 2022 Q4 |
| 8143344 | 0.4 | 2021 Q4 |
| 6810389 | 0.3 | 2022 Q2 |
| 8228947 | 2.9 | 2022 Q2 |
| 6771765 | 1.2 | 2021 Q2 |
| 8052055 | 0.5 | 2021 Q2 |
| 6993791 | 2 | 2023 Q3 |
| 6810404 | 3.1 | 2021 Q4 |
| 8094476 | 1.1 | 2021 Q3 |
| 8143347 | 2.3 | 2021 Q4 |
| 8184056 | 2.6 | 2022 Q1 |
| 8234846 | 0.7 | 2022 Q2 |
| 8228974 | 1.8 | 2022 Q2 |
| 8283736 | 1.5 | 2022 Q3 |
| 6810408 | 0.2 | 2022 Q4 |
| 8116061 | 1.9 | 2022 Q1 |
| 8003687 | 0.7 | 2022 Q2 |
| 6810394 | 0.03 | 2022 Q4 |
| 6811768 | 1.4 | 2023 Q4 |
| Total | 34.23 | |

Despite PacifiCorp's diligent efforts, certain information protected from disclosure by the attorney-client privilege or other applicable privileges or law may have been included in its responses to these data requests. PacifiCorp did not intend to waive any applicable privileges or rights by the inadvertent disclosure of protected information, and PacifiCorp reserves its right to request the return or destruction of any privileged or protected materials that may have been inadvertently disclosed. Please inform PacifiCorp immediately if you become aware of any inadvertently disclosed information.

CPUC SED Data Request 1.5

Energy Safety found that PacifiCorp performed expanded clearing for 2,164 poles in Local Responsibility Areas (LRA) instead of a 2020 WMP initiative 5.3.5.21 – Expanded Pole Clearing target of 2,768 poles in LRA.

- (a) State the budget amount allocated in the 2020 WMP for expanded clearing of the 604 remaining LRA poles that were included in initiative 5.3.5.21 but where expanded clearing was not completed in 2020. Provide all Documents Related to Your answer and state the page number(s) of the relevant section(s) of such Documents.
- (b) State whether any fire(s) occurred in 2020 or 2021 at the location(s) of any of the 2,768 LRA poles where expanded clearing did not occur 2020, and if so identify such location(s). Provide all Documents Related to Your answer and state the page number(s) of the relevant section(s) of such Documents.
- (c) State whether PacifiCorp self-reported any non-compliance with the 2020 WMP Initiative 5.3.5.21; and if so whether such reporting was voluntary or mandatory. Provide all Documents Related to Your answer and state the page number(s) of the relevant section(s) of such Documents.

1st Revised Response to CPUC SED Data Request 1.5

Further to the Company's response to CPUC SED Data Request 1.5 dated February 16, 2024, the Company provides the following revised responses to subparts (a) and (c):

- (a) In 2020, the budget was not allocated in a manner that would allow for amount allocated information to be provided.
- (c) PacifiCorp did not self-report non-compliance with this initiative. PacifiCorp reported in its mandatory Q4 2020 Quarterly Initiative Update (QIU) that it had cleared 2,164 poles, but it erroneously reported the Wildfire Mitigation Plan (WMP) target as 2,164 poles instead of the actual target of 2,768 poles. Please refer to the Company's response to CPUC SED Data Request 1.2, Attachment CPUC SED 1.2, file "PacifiCorp_2020 Q4 QIU_20210401," cells M21 ("AnnualQuantTarget" = 2,164) and Q21 ("ProjectedQuantProgressQ1-4" = 2,164).

CPUC SED Data Request 1.6

PacifiCorp's 2020 WMP committed to a target of completing 825 miles for the 2020 WMP Initiative 5.3.5.2 Distribution Vegetation Detailed Inspection. Energy Safety's SMV audit found this Initiative to be noncompliant in part because PacifiCorp did not annually complete correction work based on the inspection results. Provide responses to the following requests:

- (a) State the number of high-risk trees that PacifiCorp identified during inspections but did not remove from these 825 distribution line miles. Document and explain all assumptions You use to identify the number of such tree. Provide all Documents Related to Your answer and state the page number(s) of the relevant section(s) of such Documents.
- (b) State the number of distribution line miles inspected for the 2020 WMP Initiative 5.2.5.2 in 2020 including the completion of all vegetation clearance work. Provide all Documents Related to Your answer and state the page number(s) of the relevant section(s) of such Documents.
- (c) State the budget amount allocated for all miles of distribution line vegetation detailed inspection that were included in the 2020 WMP Initiative 5.3.5.2 but where work was not completed in 2020. Provide all Documents Related to Your answer and state the page number(s) of the relevant section(s) of such Documents.
- (d) State whether PacifiCorp self-reported any non-compliance with the 2020 WMP Initiative 5.3.5.2; and if so whether such reporting was voluntary or mandatory. Provide all Documents Related to Your answer and state the page number(s) of the relevant section(s) of such Documents.
- (e) State whether PacifiCorp took corrective actions to complete all Distribution Vegetation Detailed Inspection miles that were included in the 2020 WMP initiative 5.3.5.2 but not completed in 2020.
 - i. If yes, list the date(s) when PacifiCorp conducted such corrective actions.
 - ii. If yes, show whether such completion of such work was required by any commitment in a future WMP or other regulation or requirement. Provide all Documents Related to Your answer and state the page number(s) of the relevant section(s) of such Documents.
 - iii. If no, state the reason why PacifiCorp did not take corrective action.
- (f) State PacifiCorp's target for 2021 WMP's Distribution Vegetation Detailed Inspections.

- i. List the date(s) when the inspections were completed.
- ii. State the number of miles actually completed in 2021. Provide all Documents Related to Your answer and state the page number(s) of the relevant section(s) of such Documents and the relevant rows or columns of any spreadsheets. Explain all acronyms, abbreviations and technical terms used in such documents.
- iii. State whether the 2021 WMP target includes corrective action for work included in the 2020 WMP. If so, state how many miles in the 2021 WMP are due to corrective action for work that was included in the 2020 WMP but not completed in 2020. Provide all Documents Related to Your answer and state the page number(s) of the relevant section(s) of such Documents and the rows or columns of any spreadsheets. Explain all acronyms, abbreviations and technical terms used in such documents.

1st Revised Response to CPUC SED Data Request 1.6

Further to the Company's response to CPUC SED Data Request 1.6 dated February 16, 2024, the Company provides the following revised responses to subparts (b), (d), (e), and (f)(iii):

- (b) PacifiCorp's 2020 Wildfire Mitigation Plan (WMP) Initiative 5.3.5.2 Distribution Vegetation Detailed Inspection encompassed its detailed inspections of vegetation around distribution lines and equipment—meaning routine maintenance inspections—and patrol inspections of vegetation around distribution lines and equipment—meaning activities which are incremental to routine maintenance inspections. *See* PacifiCorp's 2020 WMP, pages 217-19 (describing PacifiCorp's "regular[]" inspections of its lines and facilities and additional inspections), 233 (stating that "PacifiCorp's description of patrol inspections of vegetation around distribution electric lines and equipment is included in the company's description of detailed inspections of vegetation around distribution lines and equipment").

Detailed Inspections: The quantitative target for this initiative covered only inspection work, not associated correction work. PacifiCorp did not centrally track inspections. PacifiCorp completed 909 line-miles of detailed inspection and correction work related to this initiative, which means 909 line-miles were necessarily inspected. Please refer to Attachment CPUC SED 1.6 REVISED DetailedInspCorrect_CA_2020. The total "Tree Work Miles Complete" in column H reflects the full amount of vegetation management corrective work performed on distribution line-miles in association with detailed inspections. This total of 909 line-miles exceeds PacifiCorp's target for this initiative.

Please refer to Attachment CPUC SED 1.6 REVISED, DetailedInspCorrect_CA_2020, which shows certain distribution circuits have a status of “Working” in column G. “Working” status indicates that there was additional remaining correction work to be completed on that circuit—on top of the inspection and correction work that was already completed in 2020. For example, on row 11, the entry establishes that grid 5G41 (column C, “Grid Name”) has a total circuit length of 88.17 miles (column D, “Miles”), and that PacifiCorp completed 65 miles of tree work on that grid (circuit) (column H, “Tree Work Miles Complete”) in 2020. That 65 miles represents 74 percent of the total miles on that circuit ($65/88 = \sim 74$ percent, as shown in column I, “Tree Work % Complete”). Because there was still ~ 23 miles of tree work remaining on the ~ 88 -mile segment, the distribution circuit was labeled “Working” (column G, “Status”). For grids (circuits) where PacifiCorp had completed 100 percent of the tree work in 2020 (meaning, it had completed tree work for the entire length of the circuit), the distribution circuit is listed as “Complete” column G.

Patrol Inspections: PacifiCorp completed 1,015 miles of patrol inspections of vegetation around distribution lines and equipment. Please refer to Attachment CPUC SED 1.6, specifically file “CaliforniaTierIIITracker_CY_2020_Distribution” and sum column M to calculate total miles completed.

PacifiCorp’s Q4 2020 Quarterly Initiative Update (QIU) reported that 784 line-miles of patrol inspections of vegetation around distribution lines and equipment were completed, rather than 1,015 line-miles. Please refer to Q4 2020 QIU, cell Q22. PacifiCorp has not been able to replicate the 784 line-mile number based on its tracking, and at present, cannot explain why this number was inaccurately reported.

Corrective Work: For more information on the corrective work completed for detailed and patrol inspections on distribution lines and equipment, please refer to Attachment CPUC SED 1.6, specifically Statistic_History_Report_-_for_Excel – CA_2020, particularly the second sheet in the spreadsheet titled “Summary by Work Cd & Work ID.” This spreadsheet shows the number of trees removed in connection with PacifiCorp’s detailed and patrol inspections of distribution lines in 2020. The spreadsheet is organized as follows:

- Column B: year corresponds to calendar year 2020.
- The “year” column in the spreadsheet lists 2021 because one of PacifiCorp’s internal data systems is based on fiscal year, not calendar year, and the fiscal year in this data system corresponds to the prior calendar year (i.e., the spreadsheet lists 2021 as the year, but it refers to calendar year 2020).

- Column F: work code (work activity), filtered as follows:
 - FMD: Fire Mitigation Distribution (incremental correction work completed as a result of patrol inspections, done on circuits that were not scheduled for detailed inspections).
 - FPD: Fire Patrol Distribution (incremental correction work completed as a result of patrol inspections, done on circuits that were scheduled for later detailed inspections).
 - DST: Distribution Cycle Maintenance (corrective work as a result of detailed inspections).
 - DHS: Distribution Interim Maintenance (corrective work as a result of detailed inspections).
- Column K: total miles:
 - The spreadsheet does not include data for the column K, Total Miles because the spreadsheet is not used to track miles completed. The data inputted into this spreadsheet is based on invoices and PacifiCorp's invoices do not include miles completed. Miles completed are tracked separately.
- Column L: number of trees pruned.
- Column M: total number of trees removed including brush equivalent.
- Columns O, P and Q: number of trees removed by size class.

Attachment CPUC SED 1.6, Statistic_History_Report_-_for_Excel – CA_2020 can be cross-referenced against Attachment CPUC SED 1.6 REVISED, DetailedInspCorrect_CA_2020 and Attachment CPUC SED 1.6, CaliforniaTierIITierIIITracker_CY_2020_Distribution to show the corrective work completed on distribution circuits.

In particular, cross-referencing these spreadsheets shows that PacifiCorp did complete corrective work on distribution circuits labeled “Working.” For instance, circuit 5G41 is labeled “Working” in DetailedInspCorrect_CA_2020. Row 224, column M of Statistic_History_Report_-_for_Excel – CA_2020 shows that 889 total trees were removed (including brush equivalent) in association with detailed inspections completed on circuit 5G41.

- (d) PacifiCorp completed the quantitative target for this initiative and therefore did not self-report any non-compliance. PacifiCorp reported in its mandatory Q4 2020 QIU that it had completed 909 line-miles in connection with this initiative, but it erroneously also reported the WMP target as 909 line-miles (rather than 825 line-miles). Please refer to PacifiCorp’s response to CPUC SED Data Request 1.2, Attachment CPUC SED 1.2, file “PacifiCorp_2020 Q4 QIU_20210401,” cells Q19, M19. The Q4 2020 QIU also reported the number of patrol inspections of vegetation around distribution lines and equipment completed as a separate entry (for 5.3.5.11), even though there was no separate target for those inspections in the 2020 WMP. The QIU erroneously reported that PacifiCorp completed 784 line-miles of patrol inspections of vegetation around distribution lines and equipment, rather than 1,015 line-miles. See id. cell Q22.

To the extent that SED determines that PacifiCorp was non-compliant with other aspects of this initiative, PacifiCorp did not self-report that non-compliance.

- (e) PacifiCorp surpassed the target of 825 line miles indicated in the 2020 WMP by completing 909 line-miles of detailed inspections and 1,015 line-miles of patrol inspections. Please refer to the Company’s response to subpart (d) above.
- (f) In PacifiCorp’s 2021 WMP, PacifiCorp separated detailed inspections of vegetation around distribution lines and equipment and patrol inspections of vegetation around distribution lines and equipment, into two separate initiatives: 7.3.5.2 and 7.3.5.11.

PacifiCorp now recognizes that its target in the 2021 WMP for initiative 7.3.5.2 (distribution detailed vegetation inspections) was ambiguous and unclear, making it difficult to articulate a single number as the target. The narrative of the WMP stated that the target was “over 1,500” line-miles. Please refer to PacifiCorp 2021 WMP, page 159. However, Table 12 of the Q4 2020 quarterly data report (QDR), submitted with the 2021 WMP, stated a target of 1,380 line-miles. See Table 12, cell Z52. In response to Energy Safety Data Request 11.14(a)(i), PacifiCorp stated that the original target of over 1,500 line-miles was an estimate, and that PacifiCorp had later “refined” “the planned miles to be completed” to 1,476 line-miles. Please refer to the Company’s response to 2021 OEIS Energy Safety DR 11.14(a)(i), which is provided as attachment CPUC SED 1.6-2 REVISED.

- (iii) As noted in PacifiCorp’s response to subpart (d) above, PacifiCorp met the 2020 WMP quantitative target for initiative 5.3.5.2.

The 2021 WMP target of “over 1,500” line-miles (and later, the “refined” target of 1,476 line-miles) for distribution vegetation detailed inspections included some line-miles (incremental to the WMP target) that PacifiCorp anticipated completing but was unable to. The target for 2021, without accounting for the miles that were rolled over, was 1,380 line-miles.

CPUC SED Data Request 1.7

Provide the following responses regarding PacifiCorp's 2020 WMP Initiative 5.3.5.3 Transmission Vegetation Detailed Inspection target of 345 miles.

- (a) State the number of miles actually completed. Provide all Documents Related to Your answer and state the page number(s) of the relevant section(s) of such Documents and the relevant rows or columns of any spreadsheets. Explain all acronyms, abbreviations and technical terms used in such documents.
- (b) State the budget amount allocated for all miles of transmission vegetation detailed inspection that were included in 2020 WMP Initiative 5.3.5.3 but where work was not completed in 2020. Provide all Documents Related to Your answer and state the page number(s) of the relevant section(s) of such Documents.
- (c) State whether PacifiCorp self-reported any non-compliance with the 2020 WMP Initiative 5.3.5.3; and if so whether such reporting was voluntary or mandatory. Provide all Documents Related to Your answer and state the page number(s) of the relevant section(s) of such Documents.
- (d) State whether PacifiCorp took corrective action to complete all Transmission Vegetation Detailed Inspection miles that were included in the 2020 WMP Initiative 5.3.5.2 but not completed in 2020.
 - i. If yes, state when PacifiCorp conducted such corrective action.
 - ii. If yes, show whether such Transmission Vegetation Detailed Inspection was required by any commitment in a future WMP or other regulation or requirement. Provide all Documents Related to Your answer and state the page number(s) of the relevant section(s) of such Documents.
 - iii. If no, state the reason why PacifiCorp did not take corrective action.

1st Revised Response to CPUC SED Data Request 1.7

Further to the Company's response to CPUC SED Data Request 1.7 dated February 16, 2024, the Company provides the following revised responses to subparts (a) and (c):

- (a) PacifiCorp's 2020 Wildfire Mitigation Plan (WMP) Initiative 5.3.5.3 Transmission Vegetation Detailed Inspection encompassed its detailed inspections of vegetation around transmission lines and equipment—meaning its routine maintenance inspections—and patrol inspections of vegetation around transmission lines and equipment—meaning activities incremental to routine maintenance inspections. Please refer to PacifiCorp's 2020 WMP, pages 220-22 (describing PacifiCorp's

“regular[.]” inspections of its lines and facilities and additional inspections), 234 (stating that “PacifiCorp’s description of patrol inspections of vegetation around transmission electric lines and equipment is included in the company’s description of detailed inspections of vegetation around transmission lines and equipment”).

Detailed Inspections: In 2020, PacifiCorp completed at least 185 line-miles of detailed inspections associated with this initiative. The quantitative target for this initiative covered only inspection work, not associated correction work. PacifiCorp’s detailed inspections are divided between its local transmission lines and its main grid transmission lines.

For local transmission lines, PacifiCorp generally tracked only corrective work; it did not separately track inspections in all cases. Attachment CPUC SED 1.7 REVISED, “Veg Local Trans Progress 12-31-20 MASTER,” documents 57 line-miles of local transmission corrective work as a result of detailed inspections. See Attachment CPUC SED 1.7, “Veg Local Trans Progress 12-31-20 MASTER,” Sheet: California, cells D19 (documenting 6 miles), I19 (documenting 51 miles). Since corrective work cannot occur without prior inspection, PacifiCorp considers these 57 line-miles to have been necessarily inspected. This figure represents a conservative estimate of the number of local transmission lines PacifiCorp inspected in 2020 because PacifiCorp does not have documentation of separate inspections. In addition, in many cases, local transmission lines have distribution under-build and are therefore inspected during distribution detailed inspection and distribution patrol inspections as well.

For main grid transmission lines, PacifiCorp separately tracked inspections on its main grid transmission lines, so it is able to provide the number of line-miles inspected (rather than the number of line-miles for which correction work was completed). See Attachment CPUC SED 1.7 REVISED, “Veg Main Grid Trans Inspection Progress 12-31-20 MASTER,” Sheet: California, cell E13, which shows 129 line-miles of main grid transmission detailed inspections.

Patrol Inspections: PacifiCorp completed 348 line-miles of patrol inspections associated with this initiative. Please refer to Attachment CPUC SED 1.7, file “CaliforniaTierIIITierIIITracker_CY_2020_Transmission.” Column G is filtered to work code FMT, Fire Mitigation Transmission, which corresponds with the correction work incremental to routine maintenance. Summing column M yields 348 line-miles. In review of the data, it has been noted that the entry in cell M225 (25.3 miles complete) was entered as text. Converting that entry to number format and then summing column M results in a total of 348 line-miles completed, rather than the 323 previously reported.

The data can be further corroborated by filtering column G to show only entries for FIN, Fire Inspection, which represents inspection incremental to routine maintenance, and summing cells K223, K226, K227, K229, K231, K233, K235, K237, K239,

K241, K243, K245, K247, K249, K251, K253, and K255, the total comes to 348 miles inspected. Note, the entry in cell K226 needs to be formatted from a text to a number in order to be included in the sum accurately.

- (c) If patrol inspections of transmission lines are included in assessing whether PacifiCorp met the quantitative target for this initiative, PacifiCorp met that target. If patrol inspections are not included, PacifiCorp did not self-report its non-compliance. PacifiCorp reported in its mandatory Q4 2020 Quarterly Initiative Update (QIU) that it had completed 185 line-miles of detailed inspections in connection with this initiative, but it erroneously reported the WMP target as 185 miles (rather than 345 miles). Please refer to PacifiCorp’s response to CPUC SED Data Request 1.2, Attachment CPUC SED 1.2, file “PacifiCorp_2020 Q4 QIU_20210401,” cells Q20, M20. The Q4 2020 QIU also reported the number of completed line-miles of patrol inspections of vegetation around transmission lines and equipment as a separate entry (for 5.3.5.12), even though there was no separate target for those inspections in the 2020 WMP. The QIU erroneously reported that PacifiCorp completed 323 line-miles of patrol inspections of vegetation around transmission lines and equipment, rather than 348, because of the error noted in the Company’s response to subpart (a) above. *See id.* Cell Q23.

To the extent that SED determines that PacifiCorp was noncompliant with other aspects of the initiative, PacifiCorp did not self-report that non-compliance.

CPUC SED Data Request 1.8

Energy Safety found that in 2020, PacifiCorp only completed 2,201 miles of Vegetation Cycle Clearing instead of the 2020 WMP Initiative 5.3.5.20 target of 3,195 miles.

- (a) State whether any fire ignitions occurred in areas where vegetation cycle clearing was included in 2020 WMP Initiative 5.3.5.20 but not performed in 2020. Provide a table stating the location (i.e. circuit and pole number; and town and nearest address or other landmark) and reason for each such ignition.
- (b) State the budget amount allocated for all miles of vegetation cycle clearing that was included in 2020 WMP Initiative 5.3.5.20 but where work was not performed in 2020. Provide all Documents Related to Your answer and state the page number(s) of the relevant section(s) of such Documents.
- (c) State whether PacifiCorp self-reported any non-compliance with the 2020 WMP Initiative 5.3.5.20; and if so whether such reporting was voluntary or mandatory. Provide all Documents Related to Your answer and state the page number(s) of the relevant section(s) of such Documents.
- (d) State whether PacifiCorp took corrective action to complete all Vegetation Cycle Clearing miles that were included in the 2020 WMP Initiative 5.3.5.2 but not completed in 2020.
 - i. If yes, state when PacifiCorp conducted such corrective action.
 - ii. If yes, show whether such Transmission Vegetation Detailed Inspections were required by any commitment in a future WMP or other regulation or requirement. Provide all Documents Related to Your answer and state the page number(s) of the relevant section(s) of such Documents.
 - iii. If no, state the reason why PacifiCorp did not take corrective action.

1st Revised Response to CPUC SED Data Request 1.8

Further to the Company's response to CPUC SED Data Request 1.8 dated February 16, 2024, the Company provides the following revised responses to subparts (a), (c) and (d):

- (a) The following table identifies fire ignitions that occurred on circuits where some routine cycle maintenance was performed, but the work was not recorded as complete within calendar year 2020. In 2020, circuits 5G83 and 5G41 were also scheduled for patrol inspections (incremental to routine cycle maintenance). This incremental inspection and corrective work was completed in calendar year 2020 prior to routine maintenance being initiated. The general vicinity of the location where vegetation

contact occurred on circuit 5G41 was inspected and worked by vegetation management prior to the November 2020 ignition date.

| Date | Time | Lat | Long | City | HFTD | Suspected Cause | Facility ID | Circuit |
|-----------|-------|---------|-----------|------------|--------|---|------------------|---------|
| 4/24/2020 | 19:11 | 41.4184 | -122.4031 | Weed | Tier 2 | Contamination | 06241005.0110000 | 5G83 |
| 9/18/2020 | 12:21 | 41.5623 | -122.9308 | Fort Jones | Tier 2 | Object contact – Vegetation | 06243009.0192400 | 5G41 |
| 11/1/2020 | 13:33 | 41.4311 | -122.3748 | Weed | Tier 2 | Equipment failure – Insulator and Bushing | 06241005.0013641 | 5G83 |
| 3/4/2021 | 10:21 | 41.4422 | -122.3793 | Weed | Tier 2 | Object contact – Vehicle | 06242005.0361401 | 5G83 |

- (c) PacifiCorp did not self-report noncompliance with this initiative. PacifiCorp’s Q4 2020 Quarterly Initiative Update (QIU) erroneously reported the target for this initiative as \$6,699,302, rather than 3,195 line-miles. Please refer to PacifiCorp’s response to CPUC SED Data Request 1.2, Attachment CPUC SED 1.2, file “PacifiCorp_2020 Q4 QIU_20210401,” cell M25.

To the extent that SED determines that PacifiCorp was non-compliant with other aspects of this initiative, PacifiCorp did not self-report that non-compliance.

- (d) Please refer to the Company’s responses to subparts i. through iii. below:

- i. PacifiCorp interprets this question as asking whether the company took corrective action to complete all Vegetation Cycle Clearing miles that were included in 2020 WMP initiative 5.3.5.20, not initiative 5.3.5.2. Certain corrective work that was not completed as part of distribution routine maintenance was “rolled over” and completed in 2021, as explained in the Company’s 1st Revised response to CPUC SED Data Request 1.6 subpart (f)(iii). No other miles were rolled over.
- ii. PacifiCorp interprets this question as asking whether the company took corrective action to complete all Vegetation Cycle Clearing miles, not Transmission Vegetation Detailed Inspections, that were included in the 2020 WMP initiative 5.3.5.20. The corrective work that was rolled over was included in the 2021 WMP target for initiative 5.3.5.2, as explained in the Company’s 1st Revised response to CPUC SED Data Request 1.6 subpart (f)(iii). PacifiCorp’s 2021 WMP did not include a quantitative target for initiative 5.3.5.20.

- iii. PacifiCorp interprets this question as asking whether the company took corrective action to complete all Vegetation Cycle Clearing miles, not Transmission Vegetation Detailed Inspections, that were included in the 2020 WMP initiative 5.3.5.20. PacifiCorp did not understand itself to be legally required to roll over all uncompleted work whenever there was a shortfall in the preceding year. In this case some of the uncompleted work was not carried forward.

October 3, 2025

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Re: CA 2020-WMPs
SED-02-PacifiCorp 2020 WMP

As previewed in PacifiCorp's Request for Hearing on July 3, 2025, in response to the Safety and Enforcement Division's ("SED") Proposed Administrative Enforcement Order, dated June 3, 2025, PacifiCorp respectfully submits revised responses to certain data requests served by SED regarding PacifiCorp's 2020 Wildfire Mitigation Plan ("WMP").

Please find enclosed PacifiCorp's 1st Revised Responses to CPUC SED Data Requests 2.5, 2.6 and 2.11, as well as Attachments CPUC SED 2.5 and 2.11 1st Revised.

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

Sincerely,

 /s/
Pooja Kishore
Manager, Regulation

CPUC SED Data Request 2.5

For each of the following 2020 WMP initiatives, state whether any work was due in 2020 but not completed as of February 25, 2021, at the location where the Fort Jones fire ignited on that date:

- (a) Initiative 5.3.5.20 Vegetation Cycle Clearing;
- (b) Initiative 5.3.5.2 Distribution Vegetation Detailed Inspection;
- (c) Initiative 5.3.5.3 Transmission Vegetation Detailed Inspection;
- (d) Initiative 5.3.5.21 Expanded Pole Clearing; and
- (e) Initiative 5.3.3.3 Covered Conductor Installation.

1st Revised Response to CPUC SED Data Request 2.5

Further to the Company's response to CPUC SED Data Request 2.5 dated May 15, 2024, the Company provides the following revised response to subpart (a):

- (a) The Fort Jones fire occurred on circuit 5G41. Patrol inspection and correction work was conducted on circuit 5G41 in 2020. In addition, the majority of the line miles on the circuit received a detailed inspection, and the majority of the resulting corrective work was completed within calendar year 2020. The remaining work associated with the detailed inspection was rolled over to 2021 and completed prior to February 25, 2021.

Please refer to Attachment CPUC SED 2.5 1st REVISED, specifically file "Work ID Dates_5G41" which shows the week-ending dates when invoices were received. These dates correspond with the timeframe the inspection and maintenance activities occurred. Invoices are received weekly. The "FPD" work code represents the patrol inspection and maintenance activity. The "DNT" and "DST" work codes represent the detailed inspection and maintenance activities, respectively.

The last maintenance action associated with these work codes occurred during the week of February 27, 2021. While that date is after February 25, 2021, the invoiced work occurred earlier. Please refer to Attachment CPUC SED 2.5 1st REVISED, specifically file "PpWorkComplete_2021_5G41", rows 118 through 125, which aligns with rows 25 through 28 of file "Work ID Dates_5G41" and represents the work conducted that was invoiced for. File "PpWorkComplete_2021_5G41" shows that the work was finished on February 23, 2021.

CPUC SED Data Request 2.6

PacifiCorp stated in response to SED-01 Q2(e)(i) that PacifiCorp has now completed 32.8 of the 36.6 miles of Initiative 5.3.3.3 Covered Conductor Installation that were due by the end of 2020 but was not completed at that time.

- (a) PacifiCorp's response included a table that listed the "GhID" but not the circuit where such installations were completed. Provide this table with the addition of the circuit name for each segment of circuit that was completed in 2021, 2022 or 2023.
- (b) State whether any of the 32.8 miles completed after 2020 were included in targets for PacifiCorp's WMP for 2021 (see for instance Figure 4.5-16 showing future plans for installing covered conductor), 2022 or 2023. Provide all Documents that show PacifiCorp completed such overdue work and state the page number(s) of the relevant section(s) of such Documents.
- (c) State whether PacifiCorp requested additional budget for completion of these miles in any WMP after 2020. If so:
 - (1) Explain why. Provide all Documents Related to Your answer and state the page number(s) of the relevant section(s) of such Documents.
 - (2) State whether funding was reallocation from other work and/or if PacifiCorp submitted an application for additional funding (including but not limited to a General Rate Case request). Provide all Documents Related to Your answer and state the page number(s) of the relevant section(s) of such Documents.
- (d) Explain how PacifiCorp tracks completion of overdue 2020 work. Provide all documents that show PacifiCorp completed such overdue work and state the page number(s) of the relevant section(s) of such Documents.

1st Revised Response to CPUC SED Data Request 2.6

Further to the Company's response to CPUC SED Data Request 2.6 dated May 1, 2024, the Company provides the following revised responses to subparts (a) and (b):

- (a) Please refer to the table provided below:

| GhID | Circuit | Line Miles | Completion Quarter |
|---------|---------|------------|--------------------|
| 6771705 | 5G79 | 1 | 2021 Q2 |
| 8052057 | 5G79 | 0.9 | 2021 Q3 |
| 6771707 | 5G69 | 1.9 | 2021 Q3 |
| 8094878 | 5G69 | 2.4 | 2021 Q4 |

Despite PacifiCorp's diligent efforts, certain information protected from disclosure by the attorney-client privilege or other applicable privileges or law may have been included in its responses to these data requests. PacifiCorp did not intend to waive any applicable privileges or rights by the inadvertent disclosure of protected information, and PacifiCorp reserves its right to request the return or destruction of any privileged or protected materials that may have been inadvertently disclosed. Please inform PacifiCorp immediately if you become aware of any inadvertently disclosed information.

| GhID | Circuit | Line Miles | Completion Quarter |
|--------------|---------------|--------------|--------------------|
| 8142422 | 5G69 | 0.1 | 2022 Q2 |
| 8179571 | 5G69 | 2.9 | 2022 Q1 |
| 6810400 | 5G69 | 0.4 | 2022 Q4 |
| 8143344 | 5G69 | 0.4 | 2021 Q4 |
| 6810389 | 5G69 | 0.3 | 2022 Q2 |
| 8228947 | 7G71 and 7G73 | 2.9 | 2022 Q2 |
| 6771765 | 5G76 | 1.2 | 2021 Q2 |
| 8052055 | 5G76 | 0.5 | 2021 Q2 |
| 6993791 | 5R106 | 2 | 2023 Q3 |
| 6810404 | 6G101 | 3.1 | 2021 Q4 |
| 8094476 | 6G101 | 1.1 | 2021 Q3 |
| 8143347 | 5G69 | 2.3 | 2021 Q4 |
| 8184056 | 7G71 and 7G73 | 2.6 | 2022 Q1 |
| 8234846 | 7G71 and 7G73 | 0.7 | 2022 Q2 |
| 8228974 | 7G75 | 1.8 | 2022 Q2 |
| 8283736 | 7G75 | 1.5 | 2022 Q3 |
| 6810408 | 7G75 | 0.2 | 2022 Q4 |
| 8116061 | 5G45 | 1.9 | 2022 Q1 |
| 8003687 | 5G45 | 0.7 | 2022 Q2 |
| 6810394 | 7G71 and 7G73 | 0.03 | 2022 Q4 |
| 6811768 | 5G76 | 1.4 | 2023 Q4 |
| Total | | 34.23 | |

- (b) The circuits included in the table provided in the Company's response to subpart (a) above are included in the circuits highlighted in Figure 4.5-16 from PacifiCorp's 2021 Wildfire Mitigation Plan (WMP). Any circuits listed in the table above for which covered conductor work had not been completed by the end of 2020, 2021 or 2022 were included in the covered conductor circuit-mile target in the 2021, 2022 or 2023 WMP, respectively; however, the 2021, 2022 and 2023 WMPs did not identify individual circuits included within the line-mile targets listed for this initiative.

2020-WMPs / PacifiCorp

October 3, 2025

SED-02-PacifiCorp 2020 WMP - CPUC SED Data Request 2.11 – 1st REVISED

CPUC SED Data Request 2.11

Provide verification that inspections required by PacifiCorp's 2020 WMP initiative 5.3.5.20 Vegetation Cycle Clearing were completed for each circuit included in this initiative. Provide all Documents that show the type of inspection completed, the specific locations inspected, date of such inspection. State the page number(s) of the relevant section(s) of such Documents.

1st REVISED Response to CPUC SED Data Request 2.11

Further to the Company's response to CPUC SED Data Request 2.11 dated May 15, 2024, the Company provides the following additional response:

Please refer to Attachment CPUC SED 2.11 1st Revised which provides revised versions of files "SED_11_CA_Distribution_Work_Plan_12262020" and "SED_11_2021_Miles_Tracker".

Despite PacifiCorp's diligent efforts, certain information protected from disclosure by the attorney-client privilege or other applicable privileges or law may have been included in its responses to these data requests. PacifiCorp did not intend to waive any applicable privileges or rights by the inadvertent disclosure of protected information, and PacifiCorp reserves its right to request the return or destruction of any privileged or protected materials that may have been inadvertently disclosed. Please inform PacifiCorp immediately if you become aware of any inadvertently disclosed information.

October 3, 2025

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Re: CA 2020-WMPs
SED-04-PacifiCorp 2020 WMP

As previewed in PacifiCorp's Request for Hearing on July 3, 2025, in response to the Safety and Enforcement Division's ("SED") Proposed Administrative Enforcement Order, dated June 3, 2025, PacifiCorp respectfully submits revised responses to certain data requests served by SED regarding PacifiCorp's 2020 Wildfire Mitigation Plan ("WMP").

Please find enclosed PacifiCorp's 1st Revised Responses to CPUC SED Data Requests 4.3 and 4.7, as well Attachment CPUC SED 4.3 1st Revised.

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

Sincerely,

 /s/
Pooja Kishore
Manager, Regulation

CPUC SED Data Request 4.3

State whether any PacifiCorp policy, contractor instructions, or other Document in effect at any time on or after January 1, 2020, until July 31, 2024, specifically requires that PacifiCorp staff and/or contractors conduct ANSI A300 Part 9 Level 1 and/or Level 2 assessments for PacifiCorp distribution circuits.

(a) If so, provide such Documents, including attachments and/or appendixes and state the page number(s) of the relevant section(s) of such Document.

(b) If so, state when each such Document was in effect.

1st Revised Response to CPUC SED Data Request 4.3

Further to the Company’s response to CPUC SED Data Request 4.3 dated September 11, 2024, the Company provides the following revised response, which replaces the original response in its entirety:

(a) PacifiCorp’s Transmission & Distribution Vegetation Management Program Standard Operating Procedures (SOP) state that ANSI A300 (Part 9) Tree Risk Assessment standards and best practices “should be followed”. Please refer to the Company’s response to CPUC SED 4.2, specifically Attachment CPUC SED 4.2, file “Veg_Manag_Standard_Operating_Procedures” at 1-2. PacifiCorp believes that, in context, this language required contractors to follow those standards, but it does not specify whether to conduct Level 1 or Level 2 assessments specifically.

ANSI A300 (Part 9) states that the level of inspection “shall be specified” in the scope of work, and it provides standards for each level of assessment. The following work releases, provided in CPUC SED 4.3 REVISED, also reference and require contractors to conduct Level 1 and Level 2 assessments. These attachments are provided as example documents in effect during the specified timeframe that require contractors to conduct ANSI A300 Part 9 Level 1 assessments and Level 2 assessment as necessary.

| | | |
|---|---|---|
| <ol style="list-style-type: none">5G35 FIN ACRT closed WR 2024.pdf and 5G39 FIN ACRT closed WR 2024.pdf (Attachment 4.3 REVISED)5L73 DNT Trees completed work release 2024.pdf and 5L82 DNT Trees completed work release 2024.pdf (Attachment 4.3 REVISED) | <ol style="list-style-type: none">Page 1Page 1 | Contractors are instructed to conduct Level 1 visual assessment and where necessary, a Level 2 assessment consistent with ANSI A300 part 9. |
|---|---|---|

(b) The Transmission & Distribution Vegetation Management Program SOP were in effect as of August 19, 2019. The version of the work release referenced in the

2020-WMPs / PacifiCorp

October 3, 2025

SED-04-PacifiCorp 2020 WMP - CPUC SED Data Request 4.3 – 1st Revised

Company response to subpart (a) above was created in May 2023, and it was subsequently made available to foresters.

Despite PacifiCorp's diligent efforts, certain information protected from disclosure by the attorney-client privilege or other applicable privileges or law may have been included in its responses to these data requests. PacifiCorp did not intend to waive any applicable privileges or rights by the inadvertent disclosure of protected information, and PacifiCorp reserves its right to request the return or destruction of any privileged or protected materials that may have been inadvertently disclosed. Please inform PacifiCorp immediately if you become aware of any inadvertently disclosed information.

CPUC SED Data Request 4.7

PacifiCorp stated that two sections of circuit 5G79 - "GhID" 6771705 (1 line mile) and "GhID" 8052057 (0.8 line miles) - were scheduled for covered conductor installation under the 2020 WMP. Such conductor was not installed until 2022 Q2 and 2021 Q3, respectively.

(a) Provide a map showing the location of the following:

- pole 06240004.0216262;
- circuit 5G79 section "GhID" 6771705;
- circuit 5G79 section "GhID" 8052057; and
- any other section of circuit 5G79 where PacifiCorp planned to install covered conductor from January 1, 2020, to July 31, 2024.

(b) Label each section of circuit 5G79 related to section (a) above with the originally planned installation date and the actual installation date.

1st Revised Response to CPUC SED Data Request 4.7

Further to the Company’s prior responses to CPUC SED Data Request 4.7, the Company provides the following revised response:

Segment 6771705 was not included in the original file as it is no longer part of circuit 5G79. This layer was added to the Company’s 1st Supplemental response to CPUC SED Data Request 4.7, specifically Attachment CPUC SED 4.7 1st Supplemental. The current open point and approximate 2021 open point are marked on the map with yellow tack icons. Please refer to the table below, which shows the segments on the original circuit 5G79, their general location, and their actual or most recent forecasted completion date.

| Segment | Circuit | GPS Coordinates | Geographic Location | Original Planned Date of Installation | Date of Actual Installation/Updated Forecasted Installation Date |
|---------|-------------|---|------------------------------|---------------------------------------|--|
| 6771705 | 5G79 (5G77) | Refer to Attach CPUC SED 4.7 1 st SUPP | Washington Drive | Complete by December 2020 | Completed Q2 2021 |
| 8052057 | 5G79 | Refer to Attach CPUC SED 4.7 1 st SUPP | Ream, Palmer, and Washington | Complete by December 2020 | Completed Q3 2021 |
| 8318443 | 5G79 | Refer to Attach CPUC SED 4.7 1 st SUPP | S. Old Stage Road | Complete by December 2021 | Completed Q4 2022 |
| 8077835 | 5G79 | Refer to Attach CPUC SED 4.7 1 st SUPP | W. A. Barr Road | Complete by December 2022 | Completed Q1 2023 |

Despite PacifiCorp's diligent efforts, certain information protected from disclosure by the attorney-client privilege or other applicable privileges or law may have been included in its responses to these data requests. PacifiCorp did not intend to waive any applicable privileges or rights by the inadvertent disclosure of protected information, and PacifiCorp reserves its right to request the return or destruction of any privileged or protected materials that may have been inadvertently disclosed. Please inform PacifiCorp immediately if you become aware of any inadvertently disclosed information.

2020-WMPs / PacifiCorp

October 3, 2025

SED-04-PacifiCorp 2020 WMP - CPUC SED Data Request 4.7 – 1st Revised

| Segment | Circuit | GPS Coordinates | Geographic Location | Original Planned Date of Installation | Date of Actual Installation/Updated Forecasted Installation Date |
|---------|---------|---|---|---------------------------------------|--|
| 8170425 | 5G79 | Refer to Attach CPUC SED 4.7 1 st SUPP | Old McCloud Rd. (Shasta Trinity NF section) | Complete by December 2022 | Completed Q3 2023 |
| 8077837 | 5G79 | Refer to Attach CPUC SED 4.7 1 st SUPP | S. Mt Shasta Blvd, Bear Springs Rd, and Old McCloud Rd. | Complete by December 2022 | Completed Q3 2023 |
| 8286040 | 5G79 | Refer to Attach CPUC SED 4.7 1 st SUPP | Gray Butte | Complete by December 2022 | Completed Q2 2023 |
| 8231409 | 5G79 | Refer to Attach CPUC SED 4.7 1 st SUPP | Taps off S. Mt Shasta Blvd | Complete by December 2023 | In progress as of July 2024. |
| 8077834 | 5G79 | Refer to Attach CPUC SED 4.7 1 st SUPP | Shasta Ranch Road and W. A. Barr Rd. | Complete by December 2022 | Completed Q4 2024 |
| 8077847 | 5G79 | Refer to Attach CPUC SED 4.7 1 st SUPP | Big Canyon Dr. S. Old Stage Rd., and taps | Complete by December 2022 | Completed Q4 2024 |
| 8077838 | 5G79 | Refer to Attach CPUC SED 4.7 1 st SUPP | Old McCloud Rd. and Forest Service Road 31 | Complete by December 2022 | Pending United States Forest Service permitting |

Despite PacifiCorp's diligent efforts, certain information protected from disclosure by the attorney-client privilege or other applicable privileges or law may have been included in its responses to these data requests. PacifiCorp did not intend to waive any applicable privileges or rights by the inadvertent disclosure of protected information, and PacifiCorp reserves its right to request the return or destruction of any privileged or protected materials that may have been inadvertently disclosed. Please inform PacifiCorp immediately if you become aware of any inadvertently disclosed information.

October 14, 2025

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Re: CA 2020-WMPs
SED-02-PacifiCorp 2020 WMP

As previewed in PacifiCorp's Request for Hearing on July 3, 2025, in response to the Safety and Enforcement Division's ("SED") Proposed Administrative Enforcement Order, dated June 3, 2025, PacifiCorp respectfully submits revised responses to certain data requests served by SED regarding PacifiCorp's 2020 Wildfire Mitigation Plan ("WMP").

Please find enclosed PacifiCorp's 1st Revised Response to CPUC SED Data Request 2.12.

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

Sincerely,

 /s/
Pooja Kishore
Manager, Regulation

CPUC SED Data Request 2.12

PacifiCorp stated in response to SED-01 Q8 regarding initiative 5.3.5.20 Vegetation Cycle Clearing that "Miles that were not completed as part of distribution routine maintenance were 'rolled over' and completed in 2021." Provide a table with the following information for each circuit that was not completed in 2020:

- (a) Circuit name and geographic location.
- (b) Total number of miles of such circuit.
- (c) Total number of miles of each such circuit included in the Initiative 5.3.5.20 targets. Provide all Documents Related to Your answer and state the page number(s) of the relevant section(s) of such Documents.
- (d) Total number of miles completed in 2020. Provide all Documents Related to Your answer and state the page number(s) of the relevant section(s) of such Documents.
- (e) For each circuit with uncompleted work in 2020, state the total number of circuit miles, number of miles completed in 2021, and whether such inspection and corrective work was required by PacifiCorp's 2021 WMP. Provide all Documents Related to Your answer and state the page number(s) of the relevant section(s) of such Documents.

1st Revised Response to CPUC SED Data Request 2.12

Further to the Company's response to CPUC SED Data Request 2.12 dated May 15, 2024, the Company provides the following revised response, which replaces the original response in its entirety:

PacifiCorp's 1st Revised response to CPUC SED Data Request 1.8 clarifies that PacifiCorp rolled over some distribution routine maintenance miles, but that it did not roll over all of the miles that were not completed in connection with initiative 5.3.5.20.

Please refer to the table provided below for information about distribution routine maintenance miles that were not completed and rolled over. Please also refer to the Company's 1st Revised response to CPUC SED Data Request 2.11, specifically Attachment CPUC SED 2.11 1st REVISED, which provides supporting documentation. PacifiCorp does not have a complete record of all miles that were not completed in connection with this initiative.

2020-WMPs / PacifiCorp

October 14, 2025

SED-02-PacifiCorp 2020 WMP - CPUC SED Data Request 2.12 – 1st Revised

| Circuit | Geographic Location | Total Circuit Miles | Miles Included in Initiative 5.3.5.20 | Miles Completed in 2020 (Corrective Work) | Miles Rolled Over and Completed in 2021 | Work Included in 2021 WMP (Y/N) |
|----------------|----------------------------|----------------------------|--|--|--|--|
| 5G41 | Etna/Fort Jones Area, CA | 88.17 | 88.17 | 65 | 23.17 | The miles were included in the target for 2021 WMP initiative 5.3.5.2, but not 5.3.5.20, as explained in 1st Revised response to CPUC SED Data Request 1.8(d)(ii). |
| 5G45 | South of Weed, CA | 8.27 | 8.27 | 5 | 3.27 | |
| 5R147 | Crescent City, CA | 13.98 | 13.98 | 12.42 | 1.56 | |
| 5G83 | Mt Shasta, CA | 80 | 80 | 30 | 50 | |
| 5R194 | Crescent City, CA | 18.55 | 18.55 | 0.18 | 18.37 | |

Despite PacifiCorp's diligent efforts, certain information protected from disclosure by the attorney-client privilege or other applicable privileges or law may have been included in its responses to these data requests. PacifiCorp did not intend to waive any applicable privileges or rights by the inadvertent disclosure of protected information, and PacifiCorp reserves its right to request the return or destruction of any privileged or protected materials that may have been inadvertently disclosed. Please inform PacifiCorp immediately if you become aware of any inadvertently disclosed information.

October 14, 2025

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Re: CA 2020-WMPs
SED-04-PacifiCorp 2020 WMP

As previewed in PacifiCorp's Request for Hearing on July 3, 2025, in response to the Safety and Enforcement Division's ("SED") Proposed Administrative Enforcement Order, dated June 3, 2025, PacifiCorp respectfully submits revised responses to certain data requests served by SED regarding PacifiCorp's 2020 Wildfire Mitigation Plan ("WMP").

Please find enclosed PacifiCorp's 1st Revised Response to CPUC SED Data Request 4.2 as well Attachment CPUC SED 4.2 1st Revised.

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

Sincerely,

 /s/
Pooja Kishore
Manager, Regulation

CPUC SED Data Request 4.2

State whether any PacifiCorp policy, contractor instructions, or other Document in effect at any time on or after January 1, 2020, until July 31, 2024, specifically requires that PacifiCorp staff and/or contractors conduct ANSI A300 Part 9 Level 1 and/or Level 2 assessments for PacifiCorp transmission circuits.

- (a) If so, provide such Documents, including attachments and/or appendixes and state the page number(s) of the relevant section(s) of such Document.
- (b) If so, state when each such Document was in effect.

1st Revised Response to CPUC SED Data Request 4.2

Further to the Company’s response to CPUC SED Data Request 4.2 dated September 11, 2024, the Company provides the following revised response to subpart (a):

- (a) PacifiCorp’s Transmission & Distribution Vegetation Management Program Standard Operating Procedures (SOP) states that American National Standards Institute (ANSI) A300 (Part 9) Tree Risk Assessment standards and best practices “should be followed.” Please refer to the Company’s original response to CPUC SED 4.2, specifically Attachment CPUC SED 4.2, file “Veg_Manag_Standard_Operating_Procedures” at 1-2. PacifiCorp believes that, in context, this language requires contractors to follow those standards, but it does not specify whether to conduct Level 1 or Level 2 assessments.

ANSI A300 (Part 9) states that the level of inspection “shall be specified” in the scope of work, and it provides standards for each level of assessment. The following work releases, provided in Attachment CPUC SED 4.2 1st REVISED, also reference and require contractors to conduct Level 1 and Level 2 assessments. These attachments are provided as sample documents in effect during the specified timeframe that requires contractors to conduct ANSI A300 Part 9 Level 1 and Level 2 assessments as necessary.

| | | |
|---|---|---|
| <ul style="list-style-type: none">1. ALT668036 FIT Trees completed work release 2024.pdf (Attachment CPUC SED 4.2_REVISED)2. KFC668059 MGI Trees completed wr.pdf Attachment CPUC SED 4.2_REVISED) | <ul style="list-style-type: none">1. Page 12. Page 1 | Contractors are instructed to conduct Level 1 visual assessment and where necessary, a Level 2 assessment consistent with ANSI A300 part 9. |
|---|---|---|

- (b) The Transmission & Distribution Vegetation Management Program SOP was in effect as of August 19, 2019 requiring staff and / or contractors to follow ANSI A300

2020-WMPs / PacifiCorp

October 14, 2025

SED-04-PacifiCorp 2020 WMP - CPUC SED Data Request 4.2 – 1st Revised

(Part 9). The version of the work release referenced in the Company response to subpart (a) above was created in May 2023, and it was subsequently made available to foresters.

Despite PacifiCorp's diligent efforts, certain information protected from disclosure by the attorney-client privilege or other applicable privileges or law may have been included in its responses to these data requests. PacifiCorp did not intend to waive any applicable privileges or rights by the inadvertent disclosure of protected information, and PacifiCorp reserves its right to request the return or destruction of any privileged or protected materials that may have been inadvertently disclosed. Please inform PacifiCorp immediately if you become aware of any inadvertently disclosed information.



825 NE Multnomah, Suite 2000
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January 23, 2026

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Martha Perez
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RE: CA H.25-07-005
SED-1-21AEO

Please find enclosed PacifiCorp's Responses to CPUC (SED) Data Requests 3-5, 13, 15-22, 24-25, 29-30, and 35-56. Also provided is Attachment CPUC (SED) 3. The remaining responses will be provided under a separate cover.

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

Sincerely,

_____/s/_____
Pooja Kishore
Manager, Regulation

CPUC (SED) Data Request 3

Energy Safety found that "In 2020, PacifiCorp's normalized ignitions increased by over 30% in Tier 2 HFTD areas, when compared to the five-year average from 2015 through 2019..."¹

- (a) Provide all Document(s) that support or undermine this finding by Energy Safety. State relevant page number(s).
- (b) Provide all internal PacifiCorp communications related to or discussing this finding.

Response to CPUC (SED) Data Request 3

PacifiCorp objects to this request as overbroad and unduly burdensome. PacifiCorp further objects to this data request to the extent it seeks information that is protected by the attorney-client and/or attorney work product privileges. Subject to and without waiving the foregoing objections, PacifiCorp responds as follows:

PacifiCorp provided the data related to Energy Safety's finding in connection with its 2020 Quarterly Data Report, Table 7.2. Please see Attachment CPUC (SED) 3, Table 7.2.

This request also significantly overlaps with and/or is also duplicative of CPUC SED Data Request 1.1 and CPUC SED Data Request 3.6 that were served as part of SED's review of the 2020 Wildfire Mitigation Plan (WMP). Please refer to PacifiCorp's responses to those data requests.

¹ Energy Safety final Annual Report on Compliance, February 2023, p. 32.

CPUC (SED) Data Request 4

Energy Safety found¹ that “PacifiCorp’s failures to effectively plan and execute its wildfire mitigation work were extensive, as evidenced by its overall lack of completion of many WMP initiative targets.”

- (a) Provide all Document(s) that support or undermine this finding by Energy Safety. State relevant page number(s).
- (b) Provide all internal PacifiCorp communications related to or discussing this finding.

Response to CPUC (SED) Data Request 4

PacifiCorp objects to this request as overbroad and unduly burdensome. PacifiCorp further objects to this data request to the extent it seeks information that is protected by the attorney-client and/or attorney work product privileges. Subject to and without waiving the foregoing objections, PacifiCorp responds as follows:

PacifiCorp addresses specific initiatives at issue in the Administrative Enforcement Order in its responses to other Data Requests within this set. Please refer to PacifiCorp’s responses to questions 15 through 21, 24, and 25.

This data request is also duplicative of requests SED has already served in its review of the 2020 Wildfire Mitigation Plan (WMP) and PacifiCorp has already responded to—among others, CPUC SED Data Request 1.2 through CPUC SED Data Request 1.8, CPUC SED Data Request 2.6, CPUC SED Data Request 2.9 through CPUC SED Data Request 2.12, CPUC SED Data Request 3.2, CPUC SED Data Request 3.4 and CPUC SED Data Request 3.10. Please refer to PacifiCorp’s responses to those data requests.

¹ Energy Safety final Annual Report on Compliance, February 2023, p. 55.

CPUC (SED) Data Request 5

Energy Safety found¹ that “Of the limited number of initiatives for which PacifiCorp reported progress in its Q4 2020 QIU that aligned with the targets in its 2020 WMP, on average, PacifiCorp succeeded in completing only about half of its WMP targets for those initiatives.”

- (a) Provide all Document(s) that support or undermine this finding by Energy Safety. State relevant page number(s).
- (b) Provide all internal PacifiCorp communications related to or discussing this finding.

Response to CPUC (SED) Data Request 5

PacifiCorp objects to this request as overbroad and unduly burdensome. PacifiCorp further objects to this data request to the extent it seeks information that is protected by the attorney-client and/or attorney work product privileges. Subject to and without waiving the foregoing objections, PacifiCorp responds as follows:

PacifiCorp addresses specific initiatives at issue in the Administrative Enforcement Order in its responses to other Data Requests within this set. Please refer to PacifiCorp’s responses to questions 15 through 21, 24, and 25.

This data request is also duplicative of requests SED has already served in its review of the 2020 Wildfire Mitigation Plan (WMP) and PacifiCorp has already responded to—among others, CPUC SED Data Request 1.2 through CPUC SED Data Request 1.8, CPUC SED Data Request 2.6, CPUC SED Data Request 2.9 through CPUC SED Data Request 2.12, CPUC SED Data Request 3.2, CPUC SED Data Request 3.4 and CPUC SED Data Request 3.10. Please refer to PacifiCorp’s responses to those data requests.

¹ Energy Safety final Annual Report on Compliance, February 2023, p. 55.

CPUC (SED) Data Request 13

Provide all Document(s) that show PacifiCorp action or inaction to monitor progress, detect any issue(s) that could prevent full compliance, and take effective and timely action to remedy any such issue(s) for each 2020 WMP initiative listed in Table 1 of Attachment B to the June 3, 2025 AEO.¹ State relevant page numbers. Your response should include but is not limited to:

- schedules of internal milestones to achieve timely WMP initiative implementation;
- internal policies and/or guidance issued by PacifiCorp regarding timely WMP initiative implementation;
- policies and work products intended to identify challenges to timely WMP initiative implementation and identify and implement potential solutions;
- periodic or ad hoc internal reports on WMP initiative implementation status, challenges, and potential solutions;
- internal QA/QC procedures for evaluating the effectiveness and timelines of WMP implementation, including the frequency of any such efforts; and
- direction provided by PC managers and/or supervisors in response to barriers (internal and/or external) with the potential to interfere with timely WMP implementation.

Response to CPUC (SED) Data Request 13

PacifiCorp objects to this request as overbroad and unduly burdensome. PacifiCorp further objects to this data request to the extent it seeks information that is protected by the attorney-client and/or attorney work product privileges. Subject to and without waiving the foregoing objections, PacifiCorp responds as follows:

The Company assumes that the reference to “PC managers and/or supervisors” intended to be a reference to PacifiCorp managers and/or supervisors. Based on the foregoing assumption, the Company responds as follows:

PacifiCorp addresses specific initiatives at issue in the Administrative Enforcement Order in its responses to other Data Requests within this set. Please refer to PacifiCorp’s responses to questions 15 through 21, 24, and 25.

¹ 5.3.3.3 Install Covered Conductor; 5.3.3.6 Targeted Pole Replacements; 5.3.2.1 Installation of Weather Stations; 5.3.5.21 Radial Pole Clearing; 5.3.5.2 Distribution Vegetation Detailed Inspection and 5.3.4.11 Distribution Patrol Inspections; 5.3.5.3 Transmission Vegetation Detailed Inspection and 5.3.4.12 Transmission Patrol Inspections; 5.3.5.20 Vegetation Management to Achieve Clearances Around Electric Lines and Equipment.

Despite PacifiCorp's diligent efforts, certain information protected from disclosure by the attorney-client privilege or other applicable privileges, or law may have been included in its responses to these data requests. PacifiCorp did not intend to waive any applicable privileges or rights by the inadvertent disclosure of protected information, and PacifiCorp reserves its right to request the return or destruction of any privileged or protected materials that may have been inadvertently disclosed. Please inform PacifiCorp immediately if you become aware of any inadvertently disclosed information.

CPUC (SED) Data Request 15

For Initiative 5.3.3.3 Installation of Covered Conductor, provide documentation showing all progress towards completing this initiative, including completion date.

Response to CPUC (SED) Data Request 15

PacifiCorp objects to this request as overbroad and unduly burdensome. PacifiCorp further objects to this data request to the extent it seeks information that is protected by the attorney-client and/or attorney work product privileges. Subject to and without waiving the foregoing objections, PacifiCorp responds as follows:

This data request significantly overlaps with and/or is duplicative of requests that SED has already served in its review of the Company's 2020 Wildfire Mitigation Plan (WMP) and PacifiCorp has responded to, including CPUC SED Data Request 1.2, CPUC SED Data Request 2.5 through CPUC SED Data Request 2.7, CPUC SED Data Request 3.8 and CPUC SED Data Request 4.7. Please refer to PacifiCorp's responses to those data requests.

CPUC (SED) Data Request 16

For Initiative 5.3.3.6 Targeted Pole Replacement, provide documentation showing all progress towards completing this initiative, including completion date.

Response to CPUC (SED) Data Request 16

PacifiCorp objects to this request as overbroad and unduly burdensome. PacifiCorp further objects to this data request to the extent it seeks information that is protected by the attorney-client and/or attorney work product privileges. Subject to and without waiving the foregoing objections, PacifiCorp responds as follows:

This data request significantly overlaps with and/or is duplicative of requests that SED has already served in its review of the 2020 Wildfire Mitigation Plan (WMP) and PacifiCorp has responded to, including CPUC SED Data Request 1.3 and CPUC SED Data Request 2.8. Please refer to PacifiCorp's responses to those data requests.

CPUC (SED) Data Request 17

For Initiative 5.3.5.21 Radial Pole Clearing, provide documentation showing all progress towards completing this initiative, including completion date.

Response to CPUC (SED) Data Request 17

PacifiCorp objects to this request as overbroad and unduly burdensome. PacifiCorp further objects to this data request to the extent it seeks information that is protected by the attorney-client and/or attorney work product privileges. Subject to and without waiving the foregoing objections, PacifiCorp responds as follows:

This data request significantly overlaps with and/or is duplicative of requests that SED has already served in its review of the Company's 2020 Wildfire Mitigation Plan (WMP) and PacifiCorp has responded to, including CPUC SED Data Request 1.5, CPUC SED Data Request 2.5 and CPUC SED Data Request 3.8. Please refer to PacifiCorp's responses to those data requests.

CPUC (SED) Data Request 18

For Initiative 5.3.5.2 Distribution Vegetation Detailed Inspections, provide documentation showing all progress towards completing this initiative, including completion date.

Response to CPUC (SED) Data Request 18

PacifiCorp objects to this request as overbroad and unduly burdensome. PacifiCorp further objects to this data request to the extent it seeks information that is protected by the attorney-client and/or attorney work product privileges. Subject to and without waiving the foregoing objections, PacifiCorp responds as follows:

This data request significantly overlaps with and/or is duplicative of requests that SED has already served in its review of the Company's 2020 Wildfire Mitigation Plan (WMP) and PacifiCorp has responded to, including CPUC SED Data Request 1.6, CPUC SED Data Request 2.5, CPUC SED Data Request 3.2, CPUC SED Data Request 3.8, CPUC SED Data Request 4.3 and CPUC SED Data Request 4.5. Please refer to PacifiCorp's responses to those data requests.

CPUC (SED) Data Request 19

For Initiative 5.3.5.11 Distribution Patrol Inspections, provide documentation showing all progress towards completing this initiative, including completion date.

Response to CPUC (SED) Data Request 19

PacifiCorp objects to this request as overbroad and unduly burdensome. PacifiCorp further objects to this data request to the extent it seeks information that is protected by the attorney-client and/or attorney work product privileges. Subject to and without waiving the foregoing objections, PacifiCorp responds as follows:

This data request significantly overlaps with and/or is duplicative of requests that SED has already served in its review of the Company's 2020 Wildfire Mitigation Plan (WMP) and PacifiCorp has responded to, including CPUC SED Data Requests 1.6. Please refer to PacifiCorp's responses to that data request.

CPUC (SED) Data Request 20

For Initiative 5.3.5.3 Transmission Vegetation Detailed Inspections, provide documentation showing all progress towards completing this initiative, including completion date.

Response to CPUC (SED) Data Request 20

PacifiCorp objects to this request as overbroad and unduly burdensome. PacifiCorp further objects to this data request to the extent it seeks information that is protected by the attorney-client and/or attorney work product privileges. Subject to and without waiving the foregoing objections, PacifiCorp responds as follows:

This data request significantly overlaps with and/or is duplicative of requests that SED has already served in its review of the Company's 2020 Wildfire Mitigation Plan (WMP) and PacifiCorp has responded to, including CPUC SED Data Request 1.7, CPUC SED Data Request 2.5, CPUC SED Data Request 3.2, CPUC SED Data Request 3.8 and CPUC SED Data Request 4.4. Please refer to PacifiCorp's responses to those data requests.

CPUC (SED) Data Request 21

For Initiative 5.3.5.20 Vegetation Management to Achieve Clearances Around Electric Lines and Equipment, provide documentation showing all progress towards completing this initiative, including completion date.

Response to CPUC (SED) Data Request 21

PacifiCorp objects to this request as overbroad and unduly burdensome. PacifiCorp further objects to this data request to the extent it seeks information that is protected by the attorney-client and/or attorney work product privileges. Subject to and without waiving the foregoing objections, PacifiCorp responds as follows:

This data request significantly overlaps with and/or is duplicative of requests that SED has already served in its review of the Company's 2020 Wildfire Mitigation Plan (WMP) and PacifiCorp has responded to, including CPUC SED Data Request 1.8, CPUC SED Data Request 2.5, CPUC SED Data Request 2.11, CPUC SED Data Request 2.12 and CPUC SED Data Request 3.8. Please refer to PacifiCorp's responses to those data requests.

CPUC (SED) Data Request 22

PacifiCorp committed to revising a contractor form by January 1, 2023, to explicitly require Level 1 and (where necessary) Level 2 ANSI 300 inspections for high-risk trees as corrective action for its failure to direct inspectors to conduct such inspection.¹ PacifiCorp did not release the revised form until May 5, 2023.²

- (a) Provide all documentation related to PacifiCorp's implementation of Level 1 and Level 2 ANSI 300 inspections.
- (b) Provide all PacifiCorp communications related to or discussing implementation of Level 1 and/or Level 2 ANSI 300 inspections, including communications between PacifiCorp and its contractors.
- (c) For all PacifiCorp staff responsible for correction of this form, including all managers with responsibility for ensuring completion of this work, state their name, position, and role.

Response to CPUC (SED) Data Request 22

PacifiCorp objects to this request as overbroad and unduly burdensome. PacifiCorp further objects to this data request to the extent it seeks information that is protected by the attorney-client and/or attorney work product privileges. Subject to and without waiving the foregoing objections, PacifiCorp responds as follows:

This request significantly overlaps with and/or is duplicative of requests that SED has already served in its review of the Company's 2020 Wildfire Mitigation Plan (WMP) and PacifiCorp has responded to including CPUC SED Data Request 4.2 through CPUC SED Data Request 4.5. Please refer to PacifiCorp's responses to those data requests.

¹ Item 1.ii on page 5 of PacifiCorp's 2020 SVM Audit Corrective Action Plan dated September 23, 2022, states that PacifiCorp is developing a program tracker to address the finding that PacifiCorp failed to provide documentation demonstrating that inspectors were directed to conduct Level 1 and Level 2 assessments to identify high risk trees along distribution lines in 2020. Page 13 of the Corrective Action Plan states "PacifiCorp plans to update work release documents to explicitly instruct inspectors to conduct Level 1 and if warranted, Level 2 assessments, to identify high risk trees along the distribution lines." Page 11 states that the deadline is January 1, 2023.

² PacifiCorp issued a work release form that contains the requirement to conduct Level 1, and where warranted Level 2, assessments on May 5, 2023. See PacifiCorp's September 11, 2024, response to SED-04 Q3 regarding distribution circuits and attachment "FIN DIST WORK RELEASE_ALL STATES.pdf", which states "Contractor shall conduct a Level 1 visual assessment and where necessary, a Level 2 assessment consistent with ANSI A300 (part 9) and PacifiCorp's Standard Operating Procedures to identify all high-risk trees (hazard trees) for removal"; and attachment "CA_DNT WORK RELEASE.pdf."

CPUC (SED) Data Request 24

The “Request of PacifiCorp (U 901 E) for Hearing on Proposed Administrative Enforcement Order” (page 24) states, “Similarly, SED notes that PacifiCorp’s statements that it completed 345 miles of inspection and corrective work for initiative 5.3.5.3 (transmission detailed vegetation inspections) conflict with prior statements that it completed 184 miles”. The “Request of PacifiCorp” (footnote 74) cites in part page 38 of the SED investigation report. Provide all documents that support or undermine the quoted finding by SED.

Response to CPUC (SED) Data Request 24

PacifiCorp objects to this request as overbroad and unduly burdensome. PacifiCorp further objects to this data request to the extent it seeks information that is protected by the attorney-client and/or attorney work product privileges. Subject to and without waiving the foregoing objections, PacifiCorp responds as follows:

Please refer to PacifiCorp’s revised response to CPUC SED Data Request 1.7 that was served in SED’s review of the Company’s 2020 Wildfire Mitigation Plan (WMP).

CPUC (SED) Data Request 25

The “REQUEST OF PACIFICORP“ (p. 24) states “...PacifiCorp’s statement that it completed 345 miles of work referred to its transmission patrol vegetation inspections, and its statement that it completed 184 miles of work referred to its transmission detailed vegetation inspections.” PacifiCorp’s hearing request (p. 24 footnote 74) cites in part to p. 16 of the SED investigation report.

SED’s investigation report refers (p. 16, footnotes 46 and 49) to “PacifiCorp’s February 16, 2024, response to SED-01 Q7(a)” which states in part, “PacifiCorp completed 347 line miles associated with this initiative ... [t]he Company’s 2020 Wildfire Mitigation Plan (WMP), Initiative 5.3.5.3 Transmission Vegetation Detailed Inspection ...”

Provide all Document(s) that substantiate that PacifiCorp’s response to SED-01 Q7(a) referred to transmission patrols. State relevant page number(s).

Response to CPUC (SED) Data Request 25

PacifiCorp objects to this request as overbroad and unduly burdensome. PacifiCorp further objects to this data request to the extent it seeks information that is protected by the attorney-client and/or attorney work product privileges. Subject to and without waiving the foregoing objections, PacifiCorp responds as follows:

Please refer to PacifiCorp’s revised response to CPUC SED Data Request 1.7 that was served in SED’s review of the Company’s 2020 Wildfire Mitigation Plan (WMP).

CPUC (SED) Data Request 29

PacifiCorp claimed that “competition was primarily manifested in labor shortages throughout 2020, as all of California’s electrical IOUs sought qualified linemen to complete WMP projects.” Provide any and all Document(s) showing that any California IOU other than PacifiCorp failed to secure sufficient line-workers to complete their WMP covered conductor installation goals. State relevant page number(s).

Response to CPUC (SED) Data Request 29

PacifiCorp objects to this data request to the extent it seeks information that is protected by the attorney-client and/or attorney work product privileges. Subject to and without waiving the foregoing objection, the Company responds as follows:

The requested information is not within PacifiCorp’s possession, custody, or control.

CPUC (SED) Data Request 30

Provide all documentation between PacifiCorp employees related to or concerning PacifiCorp's obligations to comply with the 2020 WMP.

Response to CPUC (SED) Data Request 30

PacifiCorp objects to this request as overbroad and unduly burdensome. PacifiCorp further objects to this data request to the extent it seeks information that is protected by the attorney-client and/or attorney work product privileges. Subject to and without waiving the foregoing objections, PacifiCorp responds as follows:

PacifiCorp addresses specific initiatives at issue in the Administrative Enforcement Order in its responses to other Data Requests within this set. Please refer to PacifiCorp's responses to questions 15 through 21, 24, and 25.

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CPUC (SED) Data Request 35

Provide all documents reviewed by or relied upon by any expert witness PacifiCorp intends to call as a witness at the evidentiary hearing.

Response to CPUC (SED) Data Request 35

PacifiCorp objects to this data request to the extent it seeks information that is protected by the attorney-client and/or attorney work product privileges. Subject to and without waiving the foregoing objection, the Company responds as follows:

PacifiCorp will produce any documents reviewed by or relied upon by any expert witness.

Despite PacifiCorp's diligent efforts, certain information protected from disclosure by the attorney-client privilege or other applicable privileges, or law may have been included in its responses to these data requests. PacifiCorp did not intend to waive any applicable privileges or rights by the inadvertent disclosure of protected information, and PacifiCorp reserves its right to request the return or destruction of any privileged or protected materials that may have been inadvertently disclosed. Please inform PacifiCorp immediately if you become aware of any inadvertently disclosed information.

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CPUC (SED) Data Request 36

Provide all documents not already provided that PacifiCorp intends to use during the evidentiary hearing.

Response to CPUC (SED) Data Request 36

PacifiCorp objects to this data request to the extent it seeks information that is protected by the attorney-client and/or attorney work product privileges. Subject to and without waiving the foregoing objection, the Company responds as follows:

PacifiCorp will produce all documents it intends to rely on during the evidentiary hearing.

Despite PacifiCorp's diligent efforts, certain information protected from disclosure by the attorney-client privilege or other applicable privileges, or law may have been included in its responses to these data requests. PacifiCorp did not intend to waive any applicable privileges or rights by the inadvertent disclosure of protected information, and PacifiCorp reserves its right to request the return or destruction of any privileged or protected materials that may have been inadvertently disclosed. Please inform PacifiCorp immediately if you become aware of any inadvertently disclosed information.



825 NE Multnomah, Suite 2000
Portland, Oregon 97232

January 28, 2026

Nicholas Vangrin
Legal Counsel
Safety and Enforcement Division
California Public Utilities Commission
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Legal Counsel
Legal Division
California Public Utilities Commission
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RE: CA H.25-07-005
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Please find enclosed PacifiCorp's Remaining Responses to CPUC (SED) Data Requests 1-2, 6-12, 14, 23, 26-28, and 31-34. Provided via Kiteworks are Attachments CPUC (SED) 7-1, 7-2, 7-3, 7-4, 8, 9, 23, 32-1, 32-2, 32-3, 32-4, 32-5, 32-6, 32-7, 32-8, 32-9, 33-1, 33-2, 33-3, 33-4, 33-5, and 33-6, as well as Confidential Attachment CPUC (SED) 33-7. Confidential information is provided to the Safety Enforcement Division of the California Public Utilities Commission pursuant to California Public Utilities Code § 583 and General Order 66-D.

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

Sincerely,

 /s/
Pooja Kishore
Manager, Regulation

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CPUC (SED) Data Request 1

Provide all Document(s) showing how work specified in PacifiCorp's 2020 WMP Initiatives but not performed in 2020 would have reduced wildfire risk.

Response to CPUC (SED) Data Request 1

PacifiCorp objects to this request as overbroad and unduly burdensome. PacifiCorp further objects to the extent that this question calls for material protected by the attorney-client privilege or attorney-work product protection. Subject to and without waiving these objections, PacificCorp responds as follows:

Following a reasonably diligent search, PacifiCorp has not identified any documents that "show[] how work specified in PacifiCorp's 2020 WMP Initiatives but not performed in 2020 would have reduced wildfire risk."

Despite PacifiCorp's diligent efforts, certain information protected from disclosure by the attorney-client privilege or other applicable privileges, or law may have been included in its responses to these data requests. PacifiCorp did not intend to waive any applicable privileges or rights by the inadvertent disclosure of protected information, and PacifiCorp reserves its right to request the return or destruction of any privileged or protected materials that may have been inadvertently disclosed. Please inform PacifiCorp immediately if you become aware of any inadvertently disclosed information.

CPUC (SED) Data Request 2

Energy Safety found that “PacifiCorp failed to meet the key purpose behind the WMP, which is to reduce ignitions and wildfire risk.”

- (a) Provide all Document(s) that support or undermine this finding by Energy Safety. State relevant page number(s).
- (b) Provide all internal PacifiCorp communications related to or discussing this finding.

Response to CPUC (SED) Data Request 2

PacifiCorp objects to this request as overbroad and unduly burdensome. PacifiCorp further objects to the extent that this question calls for material protected by the attorney-client privilege or attorney-work product protection. Subject to and without waiving these objections, PacifiCorp responds as follows:

This request significantly overlaps with and/or is duplicative of question 3 in this set, as well as SED Data Request 1.1 and SED Data Request 3.6 that were served as part of SED’s review of the 2020 Wildfire Mitigation Plan (WMP). Please refer to PacifiCorp’s responses to those data requests.

CPUC (SED) Data Request 6

PacifiCorp claimed that “PacifiCorp worked throughout the compliance period to further develop its risk modeling capabilities in response to feedback...”¹ Identify any Document(s) that verify that PacifiCorp developed its wildfire risk modeling capacities in 2020 and/or show that PacifiCorp used any such capacities to further 2020 WMP initiative implementation.

Response to CPUC (SED) Data Request 6

PacifiCorp objects to this request as overbroad and unduly burdensome. PacifiCorp further objects to the extent that this question calls for material protected by the attorney-client privilege or attorney-work product protection. Subject to and without waiving these objections, PacifiCorp responds as follows:

PacifiCorp will produce the documents that it intends to rely on at the hearing related to its risk modeling efforts in 2020.

¹ REQUEST OF PACIFICORP (U 901 E) FOR HEARING ON PROPOSED ADMINISTRATIVE ENFORCEMENT ORDER, July 3, 2025, p. 21.

CPUC (SED) Data Request 7

On October 14, 2025, PacifiCorp filed a Petition for Modification of Decision 06-09-032 in CPUC Application 05-07-010. In the Petition, PacifiCorp Vice President Ryan Weems declared that PacifiCorp has been subject to “significant wildfire liability-related costs” related to “a number of lawsuits relating to wildfires that occurred since 2020.”

- (a) Provide a list of all wildfire lawsuits referenced by Ryan Weems. Include in this list the case name, jurisdiction, court docket number, and outcome of the case whether by negotiated settlement or court proceeding.
- (b) Provide a copy of the complaint for each lawsuit.
- (c) Provide a copy of PacifiCorp’s Complaint Responses to each complaint.
- (d) Provide documents which state the cause of all fires.

Response to CPUC (SED) Data Request 7

- (a) Please see Attachment CPUC (SED) 7-1.
- (b) Please see Attachment CPUC (SED) 7-2.
- (c) Please see Attachment CPUC (SED) 7-3.
- (d) PacifiCorp objects to the form of the question, which presumes that the cause of a fire is known. PacifiCorp objects to the extent that the request seeks information protected by attorney-client privilege and attorney work product. Subject to these objections, and without waiving these or other objections, PacifiCorp responds as follows: without conceding the accuracy of such reports, PacifiCorp will produce the investigation reports completed by fire investigators for the Slater Fire and the McKinney Fire. Please see Attachment CPUC (SED) 7-4.

CPUC (SED) Data Request 8

On July 29, 2022, PacifiCorp equipment was involved in a fire near McKinney Creek in Siskiyou County, California, known as the McKinney Fire. Provide all Document(s) related to PacifiCorp's investigation into this fire.

Response to CPUC (SED) Data Request 8

PacifiCorp objects to this request because its investigation of the McKinney Fire is protected by attorney-client privilege and the attorney work-product doctrine. PacifiCorp additionally objects to the requests for "all document(s)" as overbroad and unduly burdensome. Subject to and without waiving the objections, PacifiCorp responds as follows:

PacifiCorp has responded to 96 data requests from SED in connection with SED's investigation into the McKinney Fire. Please refer to Attachment SED 8 which provides copies of PacifiCorp's data request responses.

CPUC (SED) Data Request 9

On June 27, 2021, PacifiCorp equipment on circuit 5G149 was involved in a fire in the city of Yreka, California, at latitude 41.7325 and longitude -122.621. In response to SED Data Request SED-01 Q5(b), PacifiCorp stated “on fire occurred within a LRA at a facility where PacifiCorp does not have a record of pole clearing taking place in 2020”.

- (a) Provide all records related to PacifiCorp’s investigation into this fire.
- (b) Provide all records related to vegetation management that took place in 2021 at the facility where the fire occurred.

Response to CPUC (SED) Data Request 9

PacifiCorp objects to this request as overly broad and unduly burdensome. PacifiCorp further objects to this data request to the extent it seeks information that is protected by the attorney-client and/or attorney work product privileges. Subject to and without waiving the foregoing objection, the Company responds as follows:

- (a) See Attachment CPUC (SED) 9 for records regarding the fire in the city of Yreka, California. Further, no claims were made to PacifiCorp related to the fire.
- (b) Circuit 5G149 was scheduled for vegetation patrol inspection in 2021, which was completed in February and early March 2021. The inspector inspected the entire circuit and identified necessary corrective work near certain poles on the circuit, but the inspector did not identify any corrective work necessary at latitude 41.7325 and longitude -122.621. Please see Attachment CPUC SED 9.

CPUC (SED) Data Request 10

Provide in table format the names and current contact information, if known, of all persons or entities employed by the Utility, from the year 2019 to present, who engaged with, enacted, performed, or worked on any activity that relates to any Initiative.

- (a) If the activity involved a crew of persons, only provide the information for the foreman and/or crew supervisor and above.
- (b) If the activity was performed by a third-party contractor, provide the contractor’s name and contact information.
- (c) Include in the table the employee’s title and job description. Include the work performed by the employee as it relates to any Initiative.

Response to CPUC (SED) Data Request 10

PacifiCorp objects to this request as overbroad and unduly burdensome. Subject to and without waiving these objections, PacifiCorp responds as follows:

PacifiCorp’s 2020 Wildfire Mitigation Plan (WMP), page 16, identified the role at PacifiCorp that is responsible for each of PacifiCorp’s mitigation programs. The following is the name of the employee that worked in that role in 2020 and their contact information, if they are a current employee:

| Program | Person Responsible | Role | Status and Contact Information |
|---------------------------------------|--------------------|---|---|
| 2020 WMP | David Lucas | Vice President, T&D Operations | Former Employee |
| Risk Assessment and Mapping | Heide Caswell | Director, Asset Performance and Wildfire Mitigation | Former Employee |
| Grid Design and System Hardening | Cary Ann Bailey | Wildfire Mitigation Delivery Director | Former Employee |
| Asset Management and Inspections | Amy McCluskey | Director, Asset Management | Former Employee |
| Vegetation Management and Inspections | Brian King | Director, Environmental and Vegetation Management | Current Employee Brian.King@pacificorp.com |
| Grid Operations and Protocols | Erik Brookhouse | Vice President, System Operations | Current Employee |

Despite PacifiCorp's diligent efforts, certain information protected from disclosure by the attorney-client privilege or other applicable privileges, or law may have been included in its responses to these data requests. PacifiCorp did not intend to waive any applicable privileges or rights by the inadvertent disclosure of protected information, and PacifiCorp reserves its right to request the return or destruction of any privileged or protected materials that may have been inadvertently disclosed. Please inform PacifiCorp immediately if you become aware of any inadvertently disclosed information.

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| Program | Person Responsible | Role | Status and Contact Information |
|--|---------------------------|---|---|
| | | | Erik.Brookhouse@pacificorp.com |
| Data Governance | Heide Caswell | Director, Asset Performance and Wildfire Mitigation | Former Employee |
| Resource Allocation and Methodology | Amy McCluskey | Director, Asset Management | Former Employee |
| Emergency Planning and Preparedness | Jeff Bolton | Manager, Disaster/ Risk Planning | Former Employee |
| Stakeholder Cooperation / Community Engagement | Alan Meyer | Director, Commercial Accounts and Community Relations | Current Employee Alan.Meyer@pacificorp.com |

Despite PacifiCorp's diligent efforts, certain information protected from disclosure by the attorney-client privilege or other applicable privileges, or law may have been included in its responses to these data requests. PacifiCorp did not intend to waive any applicable privileges or rights by the inadvertent disclosure of protected information, and PacifiCorp reserves its right to request the return or destruction of any privileged or protected materials that may have been inadvertently disclosed. Please inform PacifiCorp immediately if you become aware of any inadvertently disclosed information.

CPUC (SED) Data Request 11

For any current or former employee whose job duties included preparing PacifiCorp’s 2020 Wildfire Mitigation Plan, 2020 4th QIU Advice Letter, and 2020 WMP ARC or giving direction to staff preparing such documents, provide the following: the name, title, current contact information, and a summary of their role related to this question.

Response to CPUC (SED) Data Request 11

PacifiCorp objects to this request as overbroad and unduly burdensome. Subject to and without waiving these objections, PacifiCorp responds as follows:

Following a reasonably diligent investigation, PacifiCorp has identified the following employees whose job duties would have included a role in preparing the 2020 Wildfire Mitigation Plan (WMP), Q4 2020 Quarterly Initiative Update (QIU), or 2020 WMP Annual Report on Compliance (ARC). The following is the name of each employee, their job title, and their contact information, if they are a current employee:

| Name | Role | Status and Contact Information |
|-----------------------|--|--|
| Alan Meyer | Director, Commercial Accounts and Community Relations | Current Employee Alan.Meyer@pacificorp.com |
| Amy McCluskey | Director, Asset Management | Former Employee |
| April Brewer | Renewable Resource Reporting Specialist | Former Employee |
| Brian King | Director, Environmental and Vegetation Management | Current Employee Brian.King@pacificorp.com |
| Brian Pagel | Senior Business Specialist | Current Employee Brian.Pagel@pacificorp.com |
| Cary Ann Bailey | Wildfire Mitigation Delivery Director | Former Employee |
| Chris Lautenberger | Consultant | Reax Consulting |
| David Lucas | Vice President, Transmission and Distribution Operations | Former Employee |
| Heide Caswell | Director, Asset Performance and Wildfire Mitigation | Former Employee |
| Hillary Klumpe-McKown | Business Specialist | Current Employee Hillary.Klumpe_McKown@PacifiCorp.com |
| Jeff Bolton | Manager, Disaster / Risk Planning | Former Employee |
| Jim Coppedge | Manager, Distribution | Former Employee |
| Jonathan Connelly | Manager, Engineering and Environmental | Current Employee Jonathan.Connelly@pacificorp.com |
| Juan Luna | GIS Business Analyst | Current Employee Juan.Luna@pacificorp.com |
| Kerry Favero | Vegetation Management Section Chief | Former Employee |
| Marlow Vass | Manager, Claims | Current Employee Marlow.Vass@pacificorp.com |
| Marshall Payne | Director of GIS, Mapping, and Data Management | Current Employee Marshall.Payne@pacificorp.com |

Despite PacifiCorp's diligent efforts, certain information protected from disclosure by the attorney-client privilege or other applicable privileges, or law may have been included in its responses to these data requests. PacifiCorp did not intend to waive any applicable privileges or rights by the inadvertent disclosure of protected information, and PacifiCorp reserves its right to request the return or destruction of any privileged or protected materials that may have been inadvertently disclosed. Please inform PacifiCorp immediately if you become aware of any inadvertently disclosed information.

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| Name | Role | Status and Contact Information |
|--------------------|--|--|
| Megan Buckner | Asset Planning Manager | Current Employee Megan.Buckner@pacificorp.com |
| Melissa Nottingham | Manager, Stakeholder Policy and Engagement | Former Employee |
| Monte Mendenhall | Regional Business Manager | Former Employee |
| Pavel Grechanuk | Data Scientist | Former Employee |
| Pooja Kishore | Regulatory Affairs Manager | Current Employee Pooja.Kishore@pacificorp.com |
| Scott Beyer | Transmission Expansion Planning Director | Current Employee Scott.Beyer@pacificorp.com |
| Steve Harkin | Director, Safety and Training | Former Employee |
| Tim Clark | Assistant General Counsel | Current Employee Tim.Clark@pacificorp.com |
| Tyler Jones | Principal Engineer | Former Employee |

Despite PacifiCorp's diligent efforts, certain information protected from disclosure by the attorney-client privilege or other applicable privileges, or law may have been included in its responses to these data requests. PacifiCorp did not intend to waive any applicable privileges or rights by the inadvertent disclosure of protected information, and PacifiCorp reserves its right to request the return or destruction of any privileged or protected materials that may have been inadvertently disclosed. Please inform PacifiCorp immediately if you become aware of any inadvertently disclosed information.

CPUC (SED) Data Request 12

Provide all document(s) containing direction from PacifiCorp management (supervisor level or above) to staff preparing the 2020 4th QIU Advice Letter, and 2020 WMP ARC regarding the content of such reports, direction on the type and quantity of resources to use for preparing such reports, and any QA/QC process for such reports.

Response to CPUC (SED) Data Request 12

PacifiCorp objects to this request as overbroad and unduly burdensome. PacifiCorp further objects to the extent that this question calls for material protected by the attorney-client privilege or attorney-work product protection. Subject to and without waiving the foregoing objection, PacifiCorp responds as follows:

PacifiCorp will conduct a reasonably diligent search for any programmatic guidance or instructions by supervisors to staff regarding how to prepare the 2020 4th Quarterly Initiative Update (QIU) and 2020 Wildfire Mitigation Plan (WMP) Annual Report on Compliance (ARC) and, to the extent responsive, non-privileged documents are found, PacifiCorp will produce them.

CPUC (SED) Data Request 14

Provide the name and current contact information for any current or former employee, whose job duties included preparing responses to data requests from SED related to the 2020 WMP.

Response to CPUC (SED) Data Request 14

PacifiCorp objects to this request as overbroad and unduly burdensome. Subject to and without waiving these objections, PacifiCorp responds as follows:

Following a reasonably diligent investigation, PacifiCorp has identified the following employees as involved in preparing the responses to data requests from SED related to the 2020 Wildfire Mitigation Plan. PacifiCorp has provided the contact information for current employees:

| Name | Status and Contact Information |
|-------------------|--|
| Alex Vaz | Current Employee Alex.Vaz@pacificorp.com |
| Brian King | Current Employee Brian.King@pacificorp.com |
| Brian Pagel | Current Employee Brian.Pagel@pacificorp.com |
| Bruce Dao | Current Employee Bruce.Dao@pacificorp.com |
| Jonathan Moulton | Current Employee Jonathan.Moulton@pacificorp.com |
| Josh Hooley | Current Employee Josh.Hooley@pacificorp.com |
| Kevin Benson | Current Employee Kevin.Benson@pacificorp.com |
| Kevin Schiedler | Current Employee Kevin.Schiedler@pacificorp.com |
| Marlow Vass | Current Employee Marlow.Vass@pacificorp.com |
| Megan Buckner | Current Employee Megan.Buckner@pacificorp.com |
| Melissa Swenson | Current Employee Melissa.Swenson@pacificorp.com |
| Michael Thames | Current Employee Michael.Thames@pacificorp.com |
| Patricia Backlund | Current Employee Patricia.Backlund@pacificorp.com |
| Tia Solis | Former Employee |
| Tim Clark | Current Employee Tim.Clark@pacificorp.com |

Despite PacifiCorp's diligent efforts, certain information protected from disclosure by the attorney-client privilege or other applicable privileges, or law may have been included in its responses to these data requests. PacifiCorp did not intend to waive any applicable privileges or rights by the inadvertent disclosure of protected information, and PacifiCorp reserves its right to request the return or destruction of any privileged or protected materials that may have been inadvertently disclosed. Please inform PacifiCorp immediately if you become aware of any inadvertently disclosed information.

CPUC (SED) Data Request 23

PacifiCorp claimed that one of its internal data repositories is set up based on a “fiscal year,” which corresponds to the prior calendar year (e.g., if a spreadsheet is generated from this system, it will list 2021 when it refers to data from calendar year 2020) (on page 23, note 69 of PacifiCorp’s Request for Hearing, July 3, 2025).

- (a) Provide all Document(s) related to PacifiCorp’s claim that the data repository will identify work completed in 2020 and completed in 2021, including technical documentation, instructions to staff, and/or other Document(s). State relevant page number(s).
- (b) Provide all Document(s) that verify the completion date of all work under Inspections that PacifiCorp claims was completed in 2020 based on the spreadsheet dated 2021. Such documents include but are not limited to dated field staff field notes or reports, contractor invoices with documentation of completed work and relevant date(s), dated audit reports by PacifiCorp staff and/or other(s). State relevant page number(s).

Response to CPUC (SED) Data Request 23

PacifiCorp objects to the requests for “all Document(s)” as overbroad and unduly burdensome. PacifiCorp further objects to this request to the extent it calls for material protected by the attorney-client privilege or attorney-work product protection. Subject to and without waiving these objections, PacifiCorp responds as follows:

- (a.) Please refer to Attachment CPUD (SED) 23. PacifiCorp provides the following documentation regarding its data repository (known as “PVM”):
 - Functional Overview of PVM
 - Section C.4 “Fiscal Year” on page 11 of this attachment provides information regarding Fiscal Year. The second figure on page 11 provides an illustrative example of how fiscal year is used. The example shows the fiscal year 2023, while the corresponding quarter start and end dates that comprise that fiscal year fall within calendar year 2022.
- (b.) This request significantly overlaps with and/or is duplicative of requests that SED has already served in connection with its investigation into the 2020 Wildfire Mitigation Plan and PacifiCorp has responded to, including Data Requests 1.5 and 1.6. Please refer to PacifiCorp’s responses to those requests.

CPUC (SED) Data Request 26

Identify each initiative target that PacifiCorp claims it could not complete due to COVID-19 and/or supply chain issues.

- (a) For each such initiative, provide the following:
 - i. Identify the initiative and specific COVID-19 and/or supply chain issue.
 - ii. Provide all documentation relating to the specific COVID-19 and/or supply chain issue.
 - iii. Provide all communications relating to the specific COVID-19 and/or supply chain issue.
- (b) For material and/or equipment related barriers claimed by PacifiCorp, provide all related Document(s) and state relevant page number(s). Related Document(s) include but are not limited to:
 - i. Document(s) verifying the cancellation of any contract(s) by a supplier;
 - ii. Document(s) or communication(s) identifying contractor deviation(s) from agreed-upon delivery schedules;
 - iii. Internal assessments of market availability for such materials and supplies;
 - iv. External assessments of market availability for such materials and supplies.
- (c) Provide all relevant Document(s) detailing and describing all steps that PacifiCorp took to avoid or respond to equipment and supplier unavailability.

Response to CPUC (SED) Data Request 26

PacifiCorp objects to this request as overbroad and unduly burdensome. Subject to and without waiving the foregoing objections, PacifiCorp will conduct a reasonably diligent search for documents sufficient to show the manner in which COVID-19 and/or supply chain issues impacted its ability to implement its initiatives.

a. CPUC (SED) Data Request 27

For each labor supply related issue claimed by PacifiCorp, provide the following Document(s) about whether such labor supply issue affected PacifiCorp's completion of 2020 WMP initiatives:

- (a) Identify the initiative(s) affected by such labor supply, the type of labor PacifiCorp did not procure, and the approximate shortfall (hours per calendar quarter) for each such labor type.
- (b) Provide a table summarizing all instances when PacifiCorp staff responsible for WMP implementation were unable to report to work due to COVID-19; including relevant initiative(s), position title, and date(s).
- (c) Provide all Document(s) related to contracts for external labor that were cancelled by a contractor due to COVID-19.
- (d) Provide all Documents related to whether PacifiCorp and/or contractor could not comply with agreements for contracted labor in full or in part due to COVID-19.
- (e) For each instance where a contractor failed to meet their contracted requirements, provide all Document(s) that demonstrate all steps that PacifiCorp took to (1) mitigate such labor shortage; (2) procure alternative sources of labor; and/or (3) identify alternative approaches to achieving compliance in the absence of such labor.

Response to CPUC (SED) Data Request 27

PacifiCorp objects to this request as overbroad and unduly burdensome. Subject to and without waiving the foregoing objections, PacifiCorp will conduct a reasonably diligent search for documents sufficient to show the impact of labor supply issues on PacifiCorp's completion of its 2020 WMP initiatives.

CPUC (SED) Data Request 28

PacifiCorp stated that “The complexity of the [covered conductor] project lengthened the time needed to complete the design and estimation phase and to source products...”¹

- (a) Provide all Document(s) that identify the complexity of the covered conductor project design and estimation phase and product sourcing prior to beginning 2020 WMP implementation.
- (b) Provide all internal and external communications related to the covered conductor project design, estimation, and equipment and supply sourcing phases of the project.
- (c) Provide all Document(s) identifying all resources available to PacifiCorp at the beginning of 2020 WMP implementation regarding project design and estimation and product sourcing, including but not limited to other California electrical corporations; other US electrical corporations; electrical corporations in other countries; covered conductor equipment suppliers and service providers.

Response to CPUC (SED) Data Request 28

PacifiCorp objects to this request as overbroad and unduly burdensome. PacifiCorp further objects to this request as vague. Subject to and without waiving the foregoing objections, PacifiCorp will conduct a reasonably diligent search for documents sufficient to show the complexity of covered conductor designs.

¹ REQUEST OF PACIFICORP (U 901 E) FOR HEARING ON PROPOSED ADMINISTRATIVE ENFORCEMENT ORDER, July 3, 2025, p. 18.

H.25-07-005 / PacifiCorp
January 28, 2026
CPUC (SED) Data Request SED-1-21AEO

CPUC (SED) Data Request 31

Provide all documentation between PacifiCorp employees related to PacifiCorp's reporting requirements for the 2020 WMP ARC and the 2020 4th QIU Advice Letter.

Response to CPUC (SED) Data Request 31

PacifiCorp objects to this request as overbroad and unduly burdensome. PacifiCorp further objects to the extent that this question calls for material protected by the attorney-client privilege or attorney-work product protection. Subject to and without waiving the foregoing objection, PacifiCorp responds as follows:

PacifiCorp will conduct a reasonably diligent search for any programmatic guidance or instructions by supervisors to staff regarding how to prepare for the 2020 4th Quarterly Initiative Update (QIU) and 2020 Wildfire Mitigation Plan (WMP) Annual Report on Compliance (ARC) and, to the extent responsive, non-privileged documents are found, PacifiCorp will produce them.

Despite PacifiCorp's diligent efforts, certain information protected from disclosure by the attorney-client privilege or other applicable privileges, or law may have been included in its responses to these data requests. PacifiCorp did not intend to waive any applicable privileges or rights by the inadvertent disclosure of protected information, and PacifiCorp reserves its right to request the return or destruction of any privileged or protected materials that may have been inadvertently disclosed. Please inform PacifiCorp immediately if you become aware of any inadvertently disclosed information.

CPUC (SED) Data Request 32

Provide all communications between PacifiCorp and the IE related to any Initiative cited in the AEO.

Response to CPUC (SED) Data Request 32

PacifiCorp objects to this request as overbroad and unduly burdensome. Subject to and without waiving the foregoing objections, PacifiCorp responds as follows:

In the attachments provided and listed below, PacifiCorp has provided the Company's responses to data requests issued by the Independent Evaluator (IE) related to the 2020 Wildfire Mitigation Plan (WMP):

- Attachment CPUC-SED 32-1 was submitted to the IE on May 21, 2021, in response to Data Request 1.
- Attachment CPUC-SED 32-2 was submitted to the IE on May 25, 2021, in response to Data Request 2.
- Attachment CPUC-SED 32-3 was submitted to the IE on May 26, 2021, in response to Data Request 3.
- Attachment CPUC-SED 32-4 was submitted to the IE on June 2, 2021, in response to Data Request 4, questions 1-5.
- Attachment CPUC-SED 32-5 was submitted to the IE on June 2, 2021, in response to Data Request 4, questions 6-7.
- Attachment CPUC-SED 32-6 was submitted to the IE on June 3, 2021, in response to Data Request 5.
- Attachment CPUC-SED 32-7 was submitted to the IE on June 7, 2021, in response to Data Request 6.
- Attachment CPUC-SED 32-8 was submitted to the IE on June 9, 2021, in response to Data Request 7.
- Attachment CPUC-SED 32-9 was submitted to the IE on June 14, 2021, in response to Data Request 8.

CPUC (SED) Data Request 33

Provide all communications between PacifiCorp and the Wildfire Safety Division related to completion of the utility's vegetation management requirements of the WMP and all such communications related to the completion of the utility's vegetation management requirements of the 2021 WMP.

Response to CPUC (SED) Data Request 33

PacifiCorp objects to this request as overbroad and unduly burdensome. PacifiCorp further objects to this request as irrelevant to the extent it seeks communications related to the 2021 Wildfire Mitigation Plan (WMP). Subject to and without waiving the foregoing objections, PacifiCorp responds as follows:

In the attachments provided and listed below, PacifiCorp has provided data requests from Energy Safety and PacifiCorp's responses related to the Substantial Vegetation Management (SVM) Audit for the 2020 WMP:

- Attachment CPUC-SED-33-1 includes the response for Data Request PC- DR29-SVM-20210602 as referenced in the 2020 SVM Audit.
- Attachment CPUC-SED-33-2 includes the response for Data Request DR-096-SVM-20220516 as referenced in the 2020 SVM Audit.
- Attachment CPUC-SED-33-3 includes the response for Data Request DR-108-SVM-20220713 as referenced in the 2020 SVM Audit.
- Attachment CPUC-SED-33-4 includes the response for Data Request DR-109-SVM-20220802 as referenced in the 2020 SVM Audit.
- Attachment CPUC-SED-33-5 includes the response for Data Request Energy Safety-DR-114.
- Attachment CPUC-SED-33-6 and Confidential Attachment CPUC-SED-33-7 includes the response for Data Request R.18-10-007 WSD Audit, question 5.1.

Confidential information is provided to the Safety Enforcement Division of the California Public Utilities Commission pursuant to California Public Utilities Code § 583 and General Order 66-D.

CPUC (SED) Data Request 34

PacifiCorp's April 1, 2021, mandatory QIU report stated, "Significantly delays due to start up efforts and onboarding contractors to support the design and estimating phase of the projects."¹ PacifiCorp previously claimed that "engineering standards were created to facilitate implementation of a variety of tactics including the use of covered conductor"² and that it completed engineering and scoping in 2019 for 38 line-miles planned in 2020.³

- (a) Provide all Document(s) explaining any and all efforts that PacifiCorp made to complete designs within a timeframe that would have resulted in compliance with this initiative target.
- (b) Provide all communications with other utilities in California or other jurisdictions; covered conductor suppliers; external engineering design firms; and/or other entities seeking to obtain or design such designs.
- (c) Complete Table 1 regarding procurement of contractor design and estimation for covered conductor projects.

Response to CPUC (SED) Data Request 34

PacifiCorp objects to this request as overbroad and unduly burdensome. PacifiCorp further objects to this request as vague because it does not include a Table 1. Subject to and without waiving the foregoing objection, PacifiCorp responds as follows:

PacifiCorp clarifies that an engineering standard is distinct from a project design. An engineering standard establishes standardized criteria and specifications for a project. To implement the covered conductor initiative, PacifiCorp worked with contractors to develop project-specific designs.

PacifiCorp will conduct a reasonably diligent search for documents sufficient to show the manner in which issues with design impacted the covered conductor initiative in 2020.

¹ See row 7 of file PacifiCorp's 2020 Q4 QIU and column "AB" "CorrectiveActionsIfDelayed."

² See page 4 of PacifiCorp (U 901E) 2019 Wildfire Mitigation Plan Compliance Report, May 6, 2020

³ See page 7 of PacifiCorp (U 901E) 2019 Wildfire Mitigation Plan Compliance Report, May 6, 2020.

March 6, 2026

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Re: CA 2020-WMPs
SED-01-PacifiCorp 2020 WMP

As previewed in PacifiCorp's Request for Hearing on July 3, 2025, in response to the Safety and Enforcement Division's ("SED") Proposed Administrative Enforcement Order, dated June 3, 2025, PacifiCorp respectfully submits revised responses to certain data requests served by SED regarding PacifiCorp's 2020 Wildfire Mitigation Plan ("WMP").

Please find enclosed PacifiCorp's 2nd Revised Response to CPUC SED Data Request 1.3.

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

Sincerely,

 /s/
Pooja Kishore
Manager, Regulation

CPUC SED Data Request 1.3

Energy Safety found that PacifiCorp replaced 29 poles against a target of 189 poles from the 2020 WMP initiative 5.3.3.6 Targeted Pole Replacements meaning that 160 poles should have been replaced but were not.

- (a) State the budget amount allocated in Your 2020 WMP for the 160 poles were not replaced. Provide all Documents Related to Your answer and state the page number(s) of the relevant section(s) of such Documents.
- (b) State whether any fire(s) occurred in 2020 or 2021 at the 160 locations where such poles were not replaced. Provide all Documents Related to Your answer and state the page number(s) of the relevant section(s) of such Documents.
- (c) State whether PacifiCorp self-reported any non-compliance for the 160 poles that were not replaced; and if so whether such reporting was voluntary or mandatory. Provide all Documents Related to Your answer and state the page number(s) of the relevant section(s) of such Documents.
- (d) State whether PacifiCorp took corrective actions to complete installation of the 160 poles that were not replaced.
 - i. If yes, state the date(s) when PacifiCorp installed such poles.
 - ii. If yes, show whether installation of these covered conductors was required by any commitment in a future WMP or other regulation or requirement. Provide all Documents Related to Your answer and state the page number(s) of the relevant section(s) of such Documents.
 - iii. If no, state the reason why PacifiCorp did not take corrective action.

2nd Revised Response to CPUC SED Data Request 1.3

Further to the Company's prior responses to CPUC SED Data Request 1.3, the Company provides the following 2nd Revised response to update subpart (d)(i):

- (d) i. In the change noticed filed on November 1, 2021, PacifiCorp updated the method of tracking pole replacements. Please refer to Attachment CPUC SED 1.3, specifically file "2021-WMPs Change Order Report 11-1-21", page 14 and 15. As of December 31, 2023, PacifiCorp has replaced or newly installed a total of 2,929 distribution pole replacements and 274 transmission poles within covered conductor projects in California.

April 7, 2026

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Re: CA 2020-WMPs
SED-01-PacifiCorp 2020 WMP

As previewed in PacifiCorp's Request for Hearing on July 3, 2025, in response to the Safety and Enforcement Division's ("SED") Proposed Administrative Enforcement Order, dated June 3, 2025, PacifiCorp respectfully submits revised responses to certain data requests served by SED regarding PacifiCorp's 2020 Wildfire Mitigation Plan ("WMP").

Please find enclosed PacifiCorp's 3rd Revised Response to CPUC SED Data Request 1.3.

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

Sincerely,

 /s/
Pooja Kishore
Manager, Regulation

CPUC SED Data Request 1.3

Energy Safety found that PacifiCorp replaced 29 poles against a target of 189 poles from the 2020 WMP initiative 5.3.3.6 Targeted Pole Replacements meaning that 160 poles should have been replaced but were not.

- (a) State the budget amount allocated in Your 2020 WMP for the 160 poles were not replaced. Provide all Documents Related to Your answer and state the page number(s) of the relevant section(s) of such Documents.
- (b) State whether any fire(s) occurred in 2020 or 2021 at the 160 locations where such poles were not replaced. Provide all Documents Related to Your answer and state the page number(s) of the relevant section(s) of such Documents.
- (c) State whether PacifiCorp self-reported any non-compliance for the 160 poles that were not replaced; and if so whether such reporting was voluntary or mandatory. Provide all Documents Related to Your answer and state the page number(s) of the relevant section(s) of such Documents.
- (d) State whether PacifiCorp took corrective actions to complete installation of the 160 poles that were not replaced.
 - i. If yes, state the date(s) when PacifiCorp installed such poles.
 - ii. If yes, show whether installation of these covered conductors was required by any commitment in a future WMP or other regulation or requirement. Provide all Documents Related to Your answer and state the page number(s) of the relevant section(s) of such Documents.
 - iii. If no, state the reason why PacifiCorp did not take corrective action.

3rd Revised Response to CPUC SED Data Request 1.3

Further to PacifiCorp's prior responses to CPUC SED Data Request 1.3, the Company provides the following revised response to subparts (a) and (c):

- (a) In PacifiCorp's 2020 Wildfire Mitigation Plan (WMP), initiative 5.3.3.6 included PacifiCorp's plans to replace and reinforce existing poles, as well as its plans to install new poles (see 2020 WMP, pages 145 and 146). PacifiCorp replaced, reinforced or installed a total of 29 poles in 2020 in connection with this initiative; it did not replace all 29 poles.

PacifiCorp's 2020 WMP had a stated budget of \$8,436 per distribution pole replacement with 39 planned and \$24,480 per transmission pole replacement with 150 planned (see 2020 WMP, page 169, Table 23, row 6 and row 6b). The 29 reported

complete poles were all distribution therefore the budget for incomplete poles is approximately \$84,000 for distribution and \$3.6 million for transmission (\$3.7 million combined).

- (c) PacifiCorp reported in its mandatory Q4 2020 Quarterly Initiative Update (QIU) that it had completed 29 poles versus the target of 189 poles, and it stated that the initiative was “in progress”. PacifiCorp did not reference “non-compliance”, “self-reporting” or similar phrasing in its Q4 2020 QIU or elsewhere. Please refer to PacifiCorp’s response to CPUC SED Data Request 1.2, Attachment CPUC SED 1.2, file “PacifiCorp_2020 Q4 QIU_20210401”, cells M9 (“AnnualQuantTarget” = 189), Q9 (“ProjectedQuantProgressQ1-4” = 29), AA9 (“Status” = “In Progress”). To the extent that California Public Utilities Commission (CPUC) Safety and Enforcement Division (SED) determines that PacifiCorp’s spending is relevant to an assessment of compliance, PacifiCorp also stated in its mandatory 2020 Annual Report on Compliance (ARC) that it had not spent the planned amount for the category of Grid Design and System Hardening initiatives—the category that includes initiative 5.3.3.6—but PacifiCorp did not state the number of poles it had completed in connection with this initiative or that it had missed its target. Please refer to PacifiCorp’s response to CPUC SED Data Request 1.2, specifically Attachment CPUC SED 1.2, file “PacifiCorp 2020 WMP Annual Report on Compliance - 033121_FINAL.pdf”, specifically page 6.