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PAC_005



PacifiCorp 2020 SVM Audit Corrective Action Plan

9/23/22



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INTRODUCTION

In compliance with the Office of Energy Infrastructure Safety’s (OEIS) Audit Report on PacifiCorp’s Substantial Vegetation Management Work in 2020, PacifiCorp submits this Substantial Vegetation Management Audit Response and Corrective Action plan.

EXECUTIVE SUMMARY

OEIS deemed 11 (eleven) initiatives as noncompliant due to either initiative-specific discrepancies or insufficiencies identified by OEIS upon analysis of responses to data requests DR-096-SVM, DR-108-SVM, and DR-109-SVM. The 11 noncompliant conditions are presented as follows:

Table 1 : Summary of All Non-Compliances

Noncompliant Initiative	Findings	Corrective Action	PacifiCorp Response Summary
5.3.5.2	1i: PacifiCorp’s transition to a computerized tracking system in 2020 prevents PacifiCorp from being able to provide documentation to support commitments made in its 2020 WMP.	PacifiCorp shall detail the steps it is taking to ensure that its data management process allows PacifiCorp to readily verify and produce documentation showing its vegetation management programs are consistent with statements made in the WMP.	PacifiCorp plans to update work forms and is developing a program tracker, described in Section 6, that will support the validation of commitments made in future WMPs and to ensure that documentation showing its VM programs and processes are consistent with the statements made in future WMPs is produced.

Noncompliant Initiative	Findings	Corrective Action	PacifiCorp Response Summary
5.3.5.2	1ii: 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.	PacifiCorp shall detail the steps it is taking to ensure that it can readily verify and produce documentation showing its vegetation management programs are consistent with statements made in the WMP.	PacifiCorp is developing a program tracker, described in Section 6, to support the validation of all commitments made in the 2022 WMP and future WMPs and will work with SME's to Create and track actionable items, including updates to procedures as needed, to ensure that records can be readily produced and verified, and that operations align with statements made in the WMP.
5.3.5.2	1iii: PacifiCorp failed to provide documentation demonstrating that correction work is completed annually based on distribution inspections, including the identification of high-risk trees.	PacifiCorp shall a) provide an explanation of why PacifiCorp failed to complete all correction work identified in inspections in 2020, b) provide an explanation of why PacifiCorp failed to provide documentation supporting inspections identifying vegetation management work of high risk trees along a distribution circuit in 2020 as requested in DR-096-SVM-20220516, and c) provide the steps it is taking to ensure its vegetation management operations are consistent with the statements made in the WMP.	a) In the detailed response, PacifiCorp describes the resource shortage which impacted the ability to complete correction work. b) In 2020, while the system did not allow for the specific differentiation of high risk trees, it was a subset of the removed trees data. c) Please see response to initiative 5.3.5.2, finding 1ii.

Noncompliant Initiative	Findings	Corrective Action	PacifiCorp Response Summary
5.3.5.3	2i: PacifiCorp's transition to a computerized tracking system in 2020 prevents PacifiCorp from being able to provide documentation to support commitments made in its 2020 WMP.	PacifiCorp shall detail the steps it is taking to ensure that its data management process allows PacifiCorp to readily verify and produce documentation showing its vegetation management programs are consistent with statements made in the WMP.	Please see response to initiative 5.3.5.2, finding 1ii.
5.3.5.3	2ii: PacifiCorp failed to provide documentation demonstrating that inspectors were directed to conduct Level 1 and Level 2 assessments to identify high risk trees along transmission lines in 2020.	PacifiCorp shall detail the steps it is taking to ensure that it can readily verify and produce documentation showing its vegetation management programs are consistent with statements made in the WMP.	PacifiCorp is developing a program tracker, described in Section 6, to support the validation of all commitments made in the 2022 WMP, and future WMPs, and will work with SME's to create and track actionable items, including updates to procedures as needed, to ensure that records can be readily produced and verified, and that operations align with statements made in the WMP.
5.3.5.3	2iii: PacifiCorp failed to provide documentation demonstrating that correction work is completed annually based on transmission inspections.	PacifiCorp shall a) provide an explanation of why PacifiCorp failed to provide documentation showing that correction work is completed annually based on transmission inspections, and b) provide the steps it is taking to ensure its vegetation management operations are consistent with the statements made in the WMP.	In 2020, multiple forms were used depending on the type of work performed, and there was not the capability to link work identified and corrected. PacifiCorp plans to update work forms and develop a program tracker, described in Section 6, with action items to ensure that going forward, the Company can verify

Noncompliant Initiative	Findings	Corrective Action	PacifiCorp Response Summary
			and produce documentation showing its VM programs and processes are consistent with the statements made in the 2022 WMP and future WMPs.
5.3.5.3	2iv: PacifiCorp targeted inspecting 345 miles of transmission lines, but provided documentation showing inspection of 322.65 miles, 22.35 miles short of the target	PacifiCorp shall a) explain why it failed to reach its target of miles of transmission line inspected in 2020, and b) provide the steps it is taking to ensure its vegetation management operations are consistent with the targets set in the WMP.	PacifiCorp resource limitations led to missed targets. Additionally, PacifiCorp plans to provide a program tracker, described in Section 6, with action items to ensure that going forward, the Company can verify and produce documentation showing its VM programs and processes are consistent with the statements made in the WMPs.
5.3.5.4	3: PacifiCorp failed to provide documentation showing vegetation management along electrical equipment was a subset of PacifiCorp's general emergency response plans and response to urgent conditions or red flag warning in 2020.	PacifiCorp shall a) provide an explanation of why PacifiCorp was unable to provide documentation showing that vegetation management along electrical equipment was a subset of PacifiCorp's general emergency response plans and response to urgent conditions or red flag warnings in 2020, and b) provide the steps it is taking to ensure its vegetation management	Vegetation management practices, as part of the general emergency response, are not explicitly stated in emergency response plans, therefore the Company plans to update documentation to explicitly include this information going forward. Additionally, PacifiCorp is developing a program

Noncompliant Initiative	Findings	Corrective Action	PacifiCorp Response Summary
		<p>emergency response operations are consistent with the statements made in the WMP.</p>	<p>tracker, described in Section 6, to record and track action items and ensure that going forward, the Company can verify and produce documentation showing its VM programs and processes are consistent with the statements made in the WMP.</p>
5.3.5.20	<p>4i: PacifiCorp failed to provide documentation demonstrating it targeted areas of high density of vegetation for increased removal.</p>	<p>PacifiCorp shall</p> <ul style="list-style-type: none"> a) provide an explanation for why it failed to provide a plan for implementing a program for increased removal of high-risk trees in areas high density vegetation, b) if available, provide an example of the plan for the program implementation, and c) detail the steps it is taking to ensure vegetation management operations are consistent with statements made in the WMP. 	<p>Pacificorp currently has not developed a standalone plan detailing increased removal of high-risk trees in areas of high density. PacifiCorp plans to develop a program tracker, described in Section 6, with action items to ensure that going forward, the Company can verify and produce documentation showing its VM programs and processes are consistent with the statements made in the 2022 WMP and future WMPs.</p>
5.3.5.20	<p>4ii: PacifiCorp failed to provide sufficient documentation demonstrating the completion of 3,195 miles treated.</p>	<p>PacifiCorp shall</p> <ul style="list-style-type: none"> a) provide Energy Safety an Excel file or other form of documentation that is an output of PacifiCorp's data management system that shows PacifiCorp completed 3,195 miles treated under this initiative or b) if PacifiCorp cannot 	<p>PacifiCorp plans to develop a program tracker, described in Section 6, with action items to ensure that going forward, the Company can verify and produce documentation showing its VM</p>

Noncompliant Initiative	Findings	Corrective Action	PacifiCorp Response Summary
		provide the supporting documentation, explain why	programs and processes are consistent with the statements made in the 2022 WMP and future WMPs. PacifiCorp cannot provide supporting documentation due to the use of 2019 actuals as an estimate to forecast future work. The miles referenced in the 2020 plan were estimates and do not reflect actuals that were tracked at the time.
5.3.5.21	5: PacifiCorp failed to clear 2,768 LRA poles as targeted, only clearing 2,164 LRA poles in 2020.	PacifiCorp shall a) provide an explanation of why it failed to clear 604 LRA poles in 2020, and b) detail the steps it is taking to ensure the vegetation management operations are consistent with statements made in the WMP.	The target for LRA poles to be cleared was an estimate based on a timeline of November to November of the following year and, as it was the first year of the project, and the total annual number reported was not the full scope of the work completed during project timeline. PacifiCorp plans to develop a program tracker, described in Section 6, with action items to ensure that going forward, the Company can verify and produce documentation showing its VM programs and processes are consistent with the

Noncompliant Initiative	Findings	Corrective Action	PacifiCorp Response Summary
			statements made in the 2022 WMP and future WMPs.

1 CORRECTIVE ACTIONS: INITIATIVE 5.3.5.2

Table 2 : Summary of Initiative 5.3.5.2 Corrective Action Plan

Corrective Action #	Description / Deliverables	Milestone / Due Date
<p>1i. PacifiCorp shall detail the steps it is taking to ensure that its data management process allows PacifiCorp to readily verify and produce documentation showing its vegetation management programs are consistent with statements made in the WMP.</p>	<p>Deliverable(s): Update Work Forms</p> <p>Description(s): PacifiCorp will update its inventory and work complete forms to include work codes, which will allow for detailed inspections and patrol inspections to be differentiated.</p>	<p>✓ 01/01/22: Complete work forms update and implement COMPLETED</p>
<p>1ii. PacifiCorp shall detail the steps it is taking to ensure that it can readily verify and produce documentation showing its vegetation management programs are consistent with statements made in the WMP.</p>	<p>Deliverable(s): (1) Create 2020 SVM audit program tracker, (2) Update work release</p> <p>Description(s): (1) Plan with all commitments made in the WMP and work with SME's to create and track actionable items to ensure that records can be readily produced and verified, and that operations align with statements made in the WMP. (2) Include text to explicitly align with the statement made in the 2020 WMP.</p>	<p>(1) 10/14/2022 : Complete 2020 SVM Audit program tracker (2) 01/01/23 : Update Work Release</p>
<p>1iii. PacifiCorp shall a) provide an explanation of why PacifiCorp failed to complete all correction work identified in inspections in 2020, b) provide an explanation of why PacifiCorp failed to provide documentation supporting inspections identifying vegetation management work of high-risk trees along a distribution circuit in 2020 as requested in DR-096-SVM-20220516, and c) provide the steps it is taking to ensure its vegetation management operations are consistent with the statements made in the WMP.</p>	<p>a) No deliverable required, explanation provided in detailed below. b) No deliverable required, explanation provided in detailed below.</p> <p>c) Deliverable(s): (1) Create 2020 SVM audit program tracker, (2) Update Work Forms</p> <p>Description(s): (1) Plan with all commitments made in the WMP and work with SME's to create and track actionable items to ensure that records can be readily produced and verified, and that operations align with statements made in the WMP. (2) PacifiCorp will update its inventory and work complete forms to allow for differentiation between hazard tree (high risk tree) removals and other removals.</p>	<p>c) (1) 10/14/2022 : Complete 2020 SVM Audit program tracker ✓ 01/01/22: Complete work forms update and implement COMPLETED</p>

1.1 RESPONSE TO 1i

Within the PacifiCorp 2020 Substantial Vegetation Management Audit report, OEIS describes that during the audit process to verify statements: “prior to the height of fire season, a vegetation inspection is conducted in the HFTD,” and “[b]eginning in 2019, PacifiCorp implemented an additional vegetation management inspection of all overhead lines in HFTD areas in California.”, PacifiCorp was not able to provide records with designation of HFTD or program descriptions such as “detailed inspection” and “patrol inspection”.¹ Therefore the PacifiCorp data management process did not allow for documentation verifying compliance with the aforementioned statements and PacifiCorp received finding 1i, as noted in Table 3.

By cross-referencing existing records, including a list of circuits in the HFTD, PacifiCorp has documentation of the completion of all annual vegetation inspections in the HFTD. PacifiCorp will, however, take steps to improve the accessibility of the related documentation. In response to finding and corrective action 1i, as noted in Table 3, PacifiCorp has made improvements to its mobile data management software through coordination with its third-party vendor to update data collection forms, which allows for more accurate tracking of the types of inspections conducted, consistent with PacifiCorp's 2020 Wildfire Mitigation Plan. These updates record work code (detailed or patrol inspections) inspection data.

While PacifiCorp could not provide a specific record with data columns for HFTD designation and program description type, PacifiCorp can provide supplemental documentation that circuits electrically connected to the HFTD did have patrol inspections completed prior to fire season. In 2020, PacifiCorp conducted patrol inspections prior to the height of the fire season, however in the attachment provided (DR-096-SVM, response to question 3), the data associated with these patrol inspections are combined with routine detailed inspection data, which were also conducted, resulting in the impression that patrol inspections were conducted throughout the calendar year. Detailed inspections are conducted throughout the calendar year as part of PacifiCorp's routine maintenance program, while patrol inspections are targeted prior to the height of the fire season. PacifiCorp provides attachment Work_ID_Dates_5G79, which is an example of a circuit specific report that identifies work that has been conducted on the circuit through time (on a week ending basis). The information in the example report provided for Tier 3 circuit 5G79, is filtered by the 2020 calendar year and work code (FIN, which represents patrol inspections). Patrol inspections were initiated on this circuit in March of 2020 and completed at the end of July 2020 (week ending August 1st).

PacifiCorp acknowledges the value of data collection improvements and, as stated, has since implemented the software improvement, to capture inspection description type.

¹ PacifiCorp understand “detailed inspection” and “patrol inspection” as used in this context to mean “detailed inspections of vegetation” and “patrol inspections of vegetation” as used in the 2020 WMP in Sections 5.3.5.2 and 5.3.5.11.

These updates, however, are not retroactive and are being implemented moving forward. Regarding HFTD Tier designation, PacifiCorp will cross reference patrol inspection activities with Tier 2 or Tier 3 designations to confirm patrol inspections were conducted on all overhead lines in HFTD. PacifiCorp is continually identifying opportunities to improve its data collection processes and capabilities to meet its obligations.

1.2 RESPONSE TO 1ii

For the non-compliance related to 1ii, OEIS found that PacifiCorp was unable to provide documentation that inspectors were directed to conduct Level 1 and Level 2 assessments to identify high risk trees along distribution lines in 2020.

Inspectors are obligated to conduct Level 1 and Level 2 assessments, as appropriate, under the controlling contracts with contractors providing vegetation management services. In response to finding and corrective action 1ii, as noted above in Table 3, PacifiCorp will create additional documentation. PacifiCorp will review the WMP and identify qualitative commitments and verifiable statements to develop a WMP program tracker. This plan will then be used to help align and track program improvements and implementation against initiative completion.

Specifically, for this initiative, 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.

1.3 RESPONSE TO 1iii

For the Detailed Inspections of Vegetation Around Distribution Electric Lines and Equipment initiative, OEIS also stated that PacifiCorp failed to provide documentation demonstrating that correction work is completed annually based on distributions inspections, including the identification of high-risk trees.

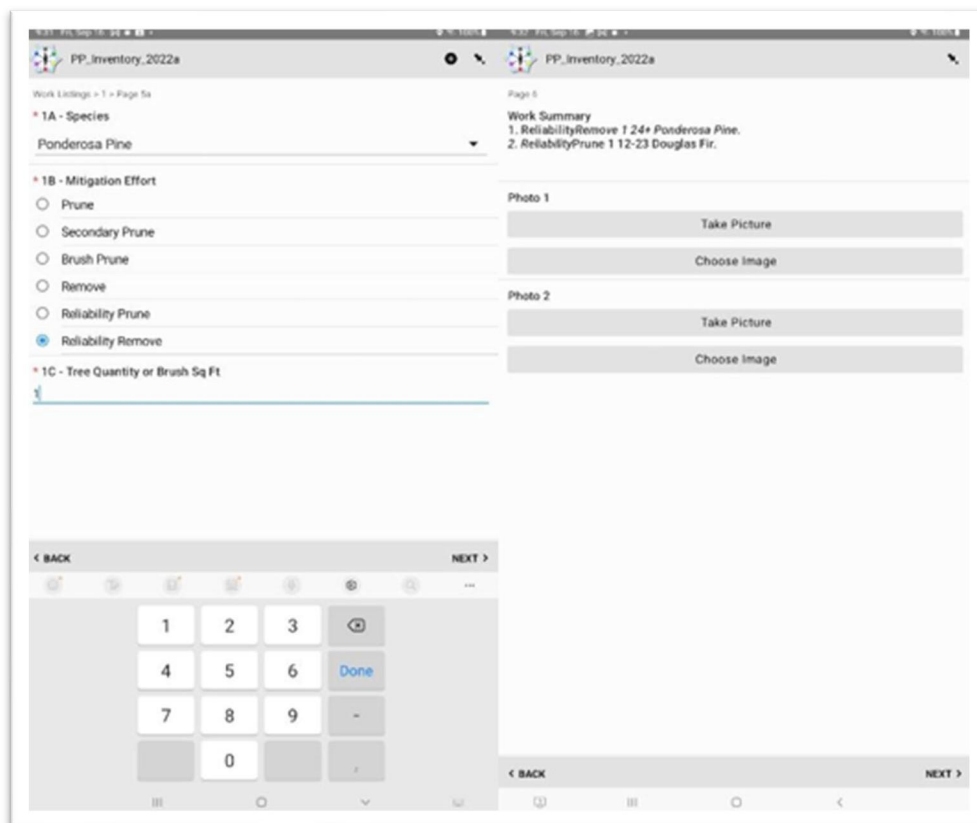
In response to finding and corrective action 1iii, as noted in Table 3, PacifiCorp provides the following:

- a) Due to resource constraints and contracting, PacifiCorp was not able to complete all correction work within the 2020 calendar year and “rolled” over remaining correction work into Q1 of 2021.
- b) In 2020, PacifiCorp transitioned to using a mobile data management software. Within this program, hazard tree removals (high-risk trees) were not differentiated between other tree removals. PacifiCorp provides attachment *PAC-DR096 – 5.3.5.2_QUESTION 5_A_5G23 WORK RELEASE_2020*, which was provided as part of the response to data request DR-096-SVM. This attachment is a distribution work release for circuit 5G23, which identifies danger trees (hazard trees and imminent conditions) to be addressed

during corrective work by the vegetation management contractor.

- c) As stated in response to finding 1ii above, PacifiCorp is developing a program tracker with all commitments made in the 2022 WMP and future WMPs, and will work with SME's to create and track actionable items to ensure that operations are consistent with statements made in the WMP. PacifiCorp is also making improvements to its mobile data management software through coordination with its third-party vendor to update data collection forms, which allows for more accurate tracking of hazard tree (high risk tree) related vegetation management activities and is developing a report, which ties together the inventory (inspection and identification of hazard trees and other work) to the work completed on that circuit (mitigation of hazard trees and other work). Updates to the inventory and work complete form have been completed, allowing for differentiation between hazard trees and other tree removals. Please refer to the screenshot below of the form interface where hazard tree (reliability removal) information is collected. The report connecting the inventory and work complete information at a work location is in beta testing and will be completed by 12/31/2022.

Figure 1 : Updated Work Form



2 Corrective actions: Initiative 5.3.5.3

Table 3 : Summary of Initiative 5.3.5.3 Corrective Action Plan

Corrective Action #	Description / Deliverables	Milestone / Due Date
2i. PacifiCorp shall detail the steps it is taking to ensure that its data management process allows PacifiCorp to readily verify and produce documentation showing its vegetation management programs are consistent with statements made in the WMP.	This finding is the same for distribution and transmission, see response for 1i for description / deliverables.	See response for 1i for milestones / due date.
2ii. PacifiCorp shall detail the steps it is taking to ensure that it can readily verify and produce documentation showing its vegetation management programs are consistent with statements made in the WMP.	This finding is the same for distribution and transmission, see response for 1ii for description / deliverables.	See response for 1ii for milestones / due date.
2iii. PacifiCorp shall a) provide an explanation of why PacifiCorp failed to provide documentation showing that correction work is completed annually based on transmission inspections, and b) provide the steps it is taking to ensure its vegetation management operations are consistent with the statements made in the WMP	a) No deliverable required, explanation provided in detailed below. b) Deliverable(s): (1) Create 2020 SVM audit program tracker, (2) Updated Report Description(s): (1) Plan with all commitments made in the WMP and work with SME's to create and track actionable items to ensure that records can be readily produced and verified, and that operations align with statements made in the WMP. (2) PacifiCorp will create a report that clearly links the work identified at a location with the work completed at the location.	b) 10/14/2022 : Complete 2020 SVM Audit program tracker 12/31/22 : Complete report update. NOTE: this report may not be retroactive.
2iv. PacifiCorp shall a) explain why it failed to reach its target of miles of transmission line inspected in 2020, and b) provide the	a) No deliverable required, explanation provided in detailed below. b) Deliverable(s): Create 2020 SVM audit program tracker	b) 10/14/2022 : Complete 2020 SVM Audit program tracker

Corrective Action #	Description / Deliverables	Milestone / Due Date
steps it is taking to ensure its vegetation management operations are consistent with the targets set in the WMP.	Description(s): Plan with all commitments made in the WMP and work with SME's to create and track actionable items to ensure that records can be readily produced and verified, and that operations align with statements made in the WMP.	

2.1 RESPONSE TO 2i

Within the PacifiCorp 2020 Substantial Vegetation Management Audit report, OEIS describes that during the audit process to verify statements: “beginning in 2019, PacifiCorp implemented an additional vegetation management inspection for all overhead lines in HFTD areas in [California],” PacifiCorp was not able to provide records with designation of HFTD or program descriptions such as “detailed inspection” and “patrol inspection”. Therefore, OEIS found that the PacifiCorp data management process did not allow for documentation verifying compliance with the aforementioned statements and PacifiCorp received finding 2i, as noted in Table 1.

In response to finding and corrective action 2i, as noted in Table 4, PacifiCorp has made improvements to its mobile data management software through coordination with its third-party vendor to update data collection forms, which allows for more accurate tracking of the types of inspections conducted consistent with PacifiCorp's Wildfire Mitigation Plan. These updates will allow the dates of inspections by work code (detailed or patrol inspections) to be identified. In 2020, PacifiCorp conducted patrol inspections prior to the height of the fire season, however in the attachment provided (DR-096-SVM, response to question 6), these patrol inspections are combined with routine detailed inspections that were also conducted resulting in the impression that patrol inspections were conducted throughout the calendar year. Detailed inspections are conducted throughout the calendar year as part of PacifiCorp's routine maintenance program, while patrol inspections are targeted prior to the height of the fire season. PacifiCorp provides attachment Work_ID_Dates_YRE668010, which is an example transmission line specific report that identifies work that has been conducted on the transmission line through time (on a week ending basis). The information in the example report provided for Tier 2 transmission line YRE668010 (or Line 10), is filtered by the 2020 calendar year and work code (FIN, which represents patrol inspections). Patrol inspections were initiated on this transmission line in March of 2020 and completed in March 2020 over the course of approximately three weeks. PacifiCorp has acknowledged the need for data collection improvements and as stated, has since implemented these improvements. These updates, however, are not retroactive and are being implemented moving forward. Regarding HFTD Tier designation, moving forward. PacifiCorp will cross reference patrol inspection activities with Tier 2 or Tier 3 designations to confirm patrol inspections were conducted on all overhead lines in HFTD. PacifiCorp is continually identifying opportunities to

improve its data collection processes and capabilities to meet its obligations.

2.2 RESPONSE TO 2ii

This response is the same for distribution and transmission, see response for 1ii for details.

2.3 RESPONSE TO 2iii

For the Detailed Inspections of Vegetation Around Transmission Electric Lines and Equipment initiative, OEIS also stated that PacifiCorp failed to provide documentation demonstrating that correction work is completed annually based on distributions inspections, including the identification of high-risk trees.

In response to finding and corrective action 2iii, as noted in Table 4, PacifiCorp provides the following:

- a) In 2020, PacifiCorp transitioned to using a mobile data management software. Within this program, separate forms are used to document work identified through inspection (inventory form) and to document tree work conducted by the vegetation management contractors (work complete form). In 2020, PacifiCorp's reporting functionality did not link the inventory form with the work complete form to show work identified and work conducted at each location. To view this information using data provided in 2020, the latitude and longitude could be used as a unique identifier to conduct an analysis to show the correlation between locations where work was identified, and work completed.
- b) As stated in response to finding 1ii above, PacifiCorp will develop a WMP program tracker with all commitments made in the WMP and work with SME's to create and track actionable items to ensure that operations are consistent with statements made in the WMP. As stated in response to finding 1iii above, PacifiCorp will also work with its vendor to develop a reporting function within its data management software to link inventories and work compete information to each location where work is identified. This will improve reporting functionality and provide a means to more clearly identify work conducted based on inventories conducted.

2.4 RESPONSE TO 2iv

In response to finding and corrective action 2iv, as noted in Table 4, PacifiCorp provides the following:

- a) In the 2020 WMP, PacifiCorp used the 2019 actuals as an estimate to forecast future work in subsequent years. The miles in the 2020 plan were estimates. The transmission

lines identified for inspection as part of this initiative were inspected, however the resulting miles were less than the estimated value in the 2020 WMP.

- b) As stated in response to finding 1ii above, PacifiCorp will review the WMP and identify qualitative commitments and verifiable statements to develop a WMP program tracker. This plan will then be used to help align and track program improvements and implementation against initiative completion.

3 CORRECTIVE ACTIONS: INITIATIVE 5.3.5.4

Table 4: Summary of Initiative 5.3.5.4 Corrective Action Plan

Corrective Action #	Description / Deliverables	Milestone / Due Date
3. PacifiCorp shall a) provide an explanation of why PacifiCorp was unable to provide documentation showing that vegetation management along electrical equipment was a subset of PacifiCorp’s general emergency response plans and response to urgent conditions or red flag warnings in 2020, and b) provide the steps it is taking to ensure its vegetation management emergency response operations are consistent with the statements made in the WMP.	<p>a) No deliverable required, explanation provided in detailed below.</p> <p>b) Deliverable(s): (1) Create 2020 SVM audit program tracker, (2) Update PSPS Playbook</p> <p>Description(s): (1) Plan with all commitments made in the WMP and work with SME’s to create and track actionable items to ensure that records can be readily produced and verified, and that operations align with statements made in the WMP.</p> <p>(2) Update to include vegetation management protocols/processes</p>	<p>b) 10/14/2022 : Complete 2020 SVM Audit program tracker</p> <p>2023 : Complete update PSPS playbook</p>

In response to finding and corrective action 3, as noted in Table 5, PacifiCorp provides the following:

- a) PacifiCorp’s emergency response plans did not explicitly identify vegetation management; however, vegetation management is part of emergency response actions where applicable. PacifiCorp conducted vegetation management actions in 2020 in response to urgent conditions. In many cases these vegetation management actions may have been incorporated into planned maintenance actions and therefore in some cases it is difficult to differentiate these actions from other planned maintenance actions. PacifiCorp has also charged emergency response actions to specific work orders. For example, please refer to the attached *Statistics_History_Report_WRK 17254854* excel document. This attachment provides an example report of vegetation management work conducted that was charged to work order 17254854, which is an

order associated with a PSPS related event in California in 2020. Vegetation management activities took place in support of this event, which exhibited urgent weather conditions.

- b) As stated in response to finding 1ii above, PacifiCorp will develop a WMP program tracker to help align and track program improvements and vegetation management program implementation against initiative completion. PacifiCorp has developed an internal document titled *PSPS Playbook*, which is intended to provide guidelines for PSPS implementation and includes reference to the Vegetation Management Coordinator. Companion to this playbook is the Vegetation Management Coordinator Checklist. PacifiCorp will update these documents to ensure vegetation management is adequately described regarding actions to be taken during PSPS events.

4 CORRECTIVE ACTIONS: INITIATIVE 5.3.5.20

Table 5: Summary of Initiative 5.3.5.20 Corrective Action Plan

Corrective Action #	Description / Deliverables	Milestone / Due Date
4i. PacifiCorp shall a) provide an explanation for why it failed to provide a plan for implementing a program for increased removal of high-risk trees in areas high density vegetation, b) if available, provide an example of the plan for the program implementation, and c) detail the steps it is taking to ensure vegetation management operations are consistent with statements made in the WMP	<p>a) No deliverable required, explanation provided in detailed below.</p> <p>b) No deliverable required, explanation provided in detailed below.</p> <p>c) Deliverable(s): (1) Create 2020 SVM audit program tracker Description(s): (1) Plan with all commitments made in the WMP and work with SME's to create and track actionable items to ensure that records can be readily produced and verified, and that operations align with statements made in the WMP.</p>	c) 10/14/2022 : Complete 2020 SVM Audit program tracker
4ii. PacifiCorp shall a) provide Energy Safety an Excel file or other form of documentation that is an output of PacifiCorp's data management system that shows PacifiCorp completed 3,195 miles treated under this initiative or b) if PacifiCorp cannot provide the supporting documentation, explain why.	<p>a) No deliverable required, explanation provided in detailed below.</p> <p>b) No deliverable required, explanation provided in detailed below.</p>	N/A

4.1 RESPONSE TO 4i

In the OEIS 2020 SVM Audit, OEIS found that PacifiCorp was unable to provide information consistent with the following information “is targeting particular areas of high density vegetation for increased removal of non-compatible tree species that have a potential to encroach on facilities.” PacifiCorp does not have a separate program or process for targeting high density vegetation. Instead, this statement in the WMP was intended to reference how vegetation management data was incorporated into LRAM and available to foresters.

In response to finding and corrective action 4i, as noted in Table 6, PacifiCorp provides the following:

- a) PacifiCorp currently has not developed a standalone plan detailing increased removal of high-risk trees in areas of high density. PacifiCorp recognizes the benefits and need

of targeted removal of high-risk trees and emphasizes this through discussion with PacifiCorp foresters and contractors. The Localized Risk Assessment Model (LRAM) provides information for PacifiCorp foresters' consideration when planning and implementing vegetation management actions.

- b) N/A, as a plan has not been created. Due to alternative programs and resource limitations, PacifiCorp does not plan to create this plan and will remove it from the next WMP.
- c) As stated in response to finding 1ii above, PacifiCorp will develop a WMP program tracker to help align and track program improvements and vegetation management program implementation against initiative completion.

4.2 RESPONSE TO 4ii

In response to finding and corrective action 4ii, as noted in Table 6, PacifiCorp provides the following:

- a) N/A
- b) In the 2020 WMP, PacifiCorp used the 2019 actuals as an estimate to forecast future work in subsequent years. The miles referenced in the 2020 plan were estimates and do not reflect actuals that were tracked at the time. In 2020, PacifiCorp completed 2,316 miles of corrective work in California as part of this initiative where miles completed were tracked and documented. This work included distribution and transmission routine maintenance and corrective work identified during patrol inspections. Please refer to attachments:
 - a. *Veg Dist Progress 12-31-2020 MASTER*
 - i. Worksheet "California," sum of cells D20 and I20 (909 miles completed).
 - b. *Veg Main Grid Trans Progress 12-31-2020 MASTER*
 - i. Worksheet "California," total in cell E13 (12 miles completed).
 - c. *Veg Local Trans Progress 12-31-2020 MASTER*
 - i. Worksheet "California," sum of cells D19 and J19 (57 miles completed).
 - d. *California Tracker_CY_2020*
 - i. Filtered column G for work codes associated with corrective work resulting from patrol inspections (FMD, FPD, FMT). Filtered column H to exclude non-related work codes (DST and DHS). Sum of column N (miles

1,338 completed).

5 CORRECTIVE ACTIONS: INITIATIVE 5.3.5.21

Table 6: Summary of Initiative 5.3.5.21 Corrective Action Plan

Corrective Action #	Description / Deliverables	Milestone / Due Date
<p>5. PacifiCorp shall a) provide an explanation of why it failed to clear 604 LRA poles in 2020, and b) detail the steps it is taking to ensure the vegetation management operations are consistent with statements made in the WMP.</p>	<p>a) No deliverable required, explanation provided in detailed below. b) Deliverable(s): (1) Create 2020 SVM audit program tracker Description(s): (1) Plan with all commitments made in the WMP and work with SME's to create and track actionable items to ensure that records can be readily produced and verified, and that operations align with statements made in the WMP.</p>	<p>b) 10/14/2022 : Complete 2020 SVM Audit program tracker</p>

In response to finding and corrective action 5, as noted in Table 7, PacifiCorp provides the following:

- a) The LRA pole clearing data included within the WMP were estimates. Pole clearing actuals may vary from the forecast as poles may be replaced, modified and become exempt, conditions change resulting in no work needed, landowners agree to maintain vegetation, etc., and due to the speed at which the contractors are able to clear poles. The pole clearing estimate provided in the 2020 WMP was based on the LRA pole clearing project, which is typically implemented from November to November of the following year. It was reported in this manner in the WMP to indicate the estimated inventory of LRA poles that would be anticipated to be completed. From November 2019 through November 2020, pole clearing activities took place at 2,790 LRA poles. In other words, the approximately 600 LRA poles that PacifiCorp was deemed deficient by, were worked in November and December of 2019. Refer to the attachment *Statistics_History_Report_LRA (Nov2019-Nov2020)*.
- b) As stated in response to finding 1ii above, PacifiCorp will develop a WMP program tracker to help align and track program improvements and vegetation management program implementation against initiative completion. In addition, in 2020, PacifiCorp transitioned to a mobile data management system, which has minimized the potential for user input error as poles cleared data is entered into the system as the work is

conducted.

6 NEW PROGRAM TRACKER FOR WMPs

A common theme throughout many OEIS corrective actions within the 2020 SVM Audit is to provide the steps the Company is taking to ensure its vegetation management operations are consistent with the targets and statements made in the WMP and that records can be produced to verify these targets and statements. PacifiCorp's response to these corrective actions is to develop a program tracker. Additionally, beginning 2022, PacifiCorp's Wildfire Program Delivery (WPD) group has invested time and resources to create a knowledge base where documentation related to program requirements and data requests received from and provided to OEIS, the Independent Evaluator, and CAL-Advocates are stored, managed, retrieved, utilized and delivered in a more efficient way. By doing this exercise, PacifiCorp identified gaps and learned that there is a need to improve consistency between internal processes and supporting documents that are used to explain and validate WMP narratives and targets.

To address this need, PacifiCorp began to develop a program tracker that will be used to monitor action items required to validate narratives in the 2022 WMP and future WMPs. Similarly, certain findings, recommendation or corrective actions reported by OEIS, the Independent Evaluator and CAL-Advocates, as well as corrective actions identified by the WPD group and SMEs will be included in the program tracker and benefit from the use of the same tracking system. Another important contribution is that the program tracker will document associated records (proof) that verifies and explains how PacifiCorp meets that narrative item or completed a corrective action. Due to the higher priority associated with the 2020 SVM Audit, the Company will make sure that the items associated with the corrective actions in this document are given precedence.

Each entry to the program tracker will be assigned to an owner with a designated priority and due date for completion of deliverables or milestones. Timelines will be monitored on a monthly basis to ensure that red flags are identified if a deadline is approaching. Overtime, the outcome of the program tracker in the form of verification records will feed the wildfire mitigation program knowledge base and help expedite and increase consistency of WMP narratives and responses to data requests.

Below is an example of how the program tracker is used to document commitments and statements. This example refers to a corrective action described in section 1.iii of this document.

- Identification of required item:

Program Requirement					
State	Requirement Category	Requirement Issue Date	Initiative	Scope (Original/Modified - see column changes for changes in scope)	Associated Records (Proof)
CA	2020 SVM Audit	8/24/2022	7.3.5.2 Detailed Inspections of Vegetation Around Distribution Electric Lines and Equipment	Energy Safety requested documentation supporting inspections identifying vegetation management work of high-risk trees along a distribution circuit in 2020. In its response, PacifiCorp referenced its response to a similar question for a transmission line. Though the response for the transmission line question did support PacifiCorp's inspection program identifying high-risk trees, the response was for transmission inspections, not distribution inspections. Therefore, Energy Safety's audit found that PacifiCorp could not produce information consistent with the statement in its 2020 WMP regarding annually completing correction work based on inspection results, including the prompt removal of high-risk trees, along distribution lines. Corrective action required by OEIS: 1111. PacifiCorp shall c) provide the steps it is taking to ensure its vegetation management operations are consistent with the statements made in the WMP.	What is expected: (2) Updated forms to allow for differentiation between hazard tree (high risk tree) removals and other removals.

- Action item tracking:

Action Items								
Priority (Low/Medium/High)	Requirement Status (Active/On Hold/Under Review/Archived/Complete/Duplicate - with note)	Action Items (Yes/No)	Action Item Description	Assigned To	Action Item Status (Active/On Hold/Canceled/Complete/Duplicate - with notes)	Milestones/ Deliverables	Start Date	Due Date
High	Active	Yes	Obtain associated record from Brian K. VidP	VidP	Active	On 01/01/22 PacifiCorp updated its inventory and VM work complete forms to allow for differentiation between hazard tree (high risk tree) removals and other removals. Need to collect and document proof.	8/16/2022	9/23/2022

Items included in the 2020 SVM program tracker to specifically address the findings in the SVM Audit CAP are:

- Updated vegetation management work forms and work release documents
- Action to create a program tracker annually for the WMP which includes an overall summary report with major issues identified to support mid plan corrective actions to ensure alignment with processes and targets
- Creation of a QA/QC report of 2022 corrective work to check alignment of records with statements made in the WMP
- New vegetation management report that clearly links the work identified at a location with the work completed at the location.
- Updated PSPS playbook
- Policy on QA/QC of QIU/QDR actuals reported

PacifiCorp acknowledges that the creation of an annual program tracker is the first step towards alignment between statements made in the WMP and the records available to prove them. As 2023 will be the first year working with this new process, PacifiCorp

anticipates there will be lessons learned and this process will evolve to continually improve.

