

EXHIBIT: PacifiCorp PAC\_145  
CPUC PROCEEDING: H.25-07-005  
SPONSOR/WITNESS: PacifiCorp/Brian King  
DESCRIPTION: SED\_Set\_3\_CA R.18-10-007  
WSD Compliance Set 2 (1-4) 6-16-21\_v1.pdf  
DATE IDENT. 6/9/2026 RECD. \_\_\_\_\_  
ALJ: GERALD F. KELLY

**PAC\_145**



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June 16, 2021

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Re: CA R.18-10-007  
2021 WSD Compliance Set 2 (1-4)

Please find enclosed PacifiCorp's Responses to WSD 2<sup>nd</sup> Set Data Requests 2.1-2.4. Also provided are Attachments WSD 2.1 –(1-2) 2.2, and 2.3.

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

Sincerely,

          /s/            
Pooja Kishore  
Manager, Regulation

## WSD Data Request 2.1

**5.3.5.2: Detailed inspections of vegetation around distribution electric lines and equipment** In its 2021 WMP Update, PacifiCorp stated that in 2020 it had conducted inspection and corrective work of 909 miles of distribution line that were scheduled for routine cycle and interim maintenance within its service territory in California, which resulted in pruning over 19,000 trees and removal of over 2,800 trees, as it pertains to PacifiCorp's 2020 WMP initiative 5.3.5.2: Detailed inspections of vegetation around distribution electric lines and equipment (initiative 7.3.5.2 in PacifiCorp's 2021 WMP Update).

- (a) Provide the raw data in Microsoft Excel format supporting the completion of 909 miles of distribution line that were scheduled for routine cycle and interim maintenance in 2020 for 2020 WMP initiative 5.3.5.2. Additionally, provide the raw data in Microsoft Excel format supporting the completion of over 19,000 trees and removal of over 2,800 trees.
- (b) Provide a list of all data inputs used to calculate initiative completion and the source of such data.
- (c) Explain what steps PacifiCorp took to validate the data identified in response to 2(b).
- (d) Explain the methodology, including any formulas and assumptions, PacifiCorp used to calculate initiative completion from the data inputs identified in response to 2(b).

## Response to WSD Data Request 2.1

The Company assumes that the references to “identified in response to 2(b)” is intended to be a reference to the data identified in the Company's responses to subpart (b) of this request, WSD Data Request 2.1. Based on the foregoing assumption, the Company responds as follows:

- (a) Please refer to Attachment WSD 2.1-1, which provides information regarding the inspection and correction mileage accomplished in calendar year 2020 for distribution cycle and interim routine vegetation maintenance. Distribution circuits scheduled for cycle maintenance (DST) that have a status of “Working” at the end of the calendar year, were pushed into Q1 2021 and completed. Please refer to Attachment WSD 2.1-2, which provides the recorded production data, including total number of trees pruned (sum of column K) and total number of trees removed (sum of columns N, O, and P), excluding brush removal.
- (b) Scheduled work is identified in an Aggregated Work Plan. Vegetation management contractors provide progress updates (miles completed) relative to target in Microsoft Excel format which was used to update status in the

Aggregated Work Plan. Production data (number of trees pruned and removed) is provided by the vegetation management contractors at the time of invoicing via a flat file that is uploaded to PacifiCorp's vegetation management database.

- (c) PacifiCorp's Senior Utility Forestry Arborists and Utility Forestry Arborists create the work plan/schedule, receive status updates from the vegetation management contractors, and conduct audits of the completed work to verify what is reported.
- (d) Determining initiative completion or substantially complete status, was determined through taking the sum of the miles reported as completed to get total miles completed within calendar year 2020.

## WSD Data Request 2.2

**5.3.5.5: Fuel management and reduction of “slash” from vegetation management activities** In PacifiCorp’s 2021 WMP update, PacifiCorp stated that in 2020 it had conducted vegetation clearing of 2,164 poles outside of SRA (Cal Fire state regulated areas), which is incremental to mandated pole clearing activity, as it pertains to PacifiCorp’s 2020 WMP initiative 5.3.5.5: Fuel management and reduction of “slash” from vegetation management activities (initiative 7.3.5.5 in PacifiCorp’s 2021 WMP Update).2. PacifiCorp also stated that it had implemented slash management in accordance with the company’s Vegetation SOP and through expanded pole clearing.

- (a) Provide the raw data in Microsoft Excel format supporting the completion of 2,164 poles cleared for vegetation outside of SRA in 2020, for 2020 WMP initiative 5.3.5.5.
- (b) Provide a list of all data inputs used to calculate initiative completion and the source of such data.
- (c) Explain what steps PacifiCorp took to validate the data identified in response to 3(b).
- (d) Explain the methodology, including any formulas and assumptions, PacifiCorp used to calculate initiative completion from the data inputs identified in response to 3(b).
- (e) Additionally provide data supporting implementation of slash management in accordance with the company’s Vegetation SOP and through expanded pole clearing

## Response to WSD Data Request 2.2

The Company assumes that the references to “identified in response to 3(b)” is intended to be a reference to the data identified in the Company’s responses to subpart (b) of this request, WSD Data Request 2.2. Based on the foregoing assumption, the Company responds as follows:

- (a) Please refer to Attachment WSD 2.2, which provides the recorded number of poles cleared by circuit, incremental to regulatory mandated state regulated areas (SRA) pole clearing activities.
- (b) Circuits where pole clearing activities are to be completed are identified and provided to the vegetation management contractor. The vegetation management contractors provide progress updates relative to target in Microsoft Excel format and as part of the invoice process. The vegetation management contractors provide a flat file with production data, in this case, number of poles cleared, which is then uploaded to PacifiCorp’s vegetation management database.

- (c) Foresters review invoices to confirm work completed. No additional reviews were completed in 2020 specific to pole clearing activities, however during post auditing tree pruning work pole clearing activities would receive a cursory review without documentation. PacifiCorp is incorporating a process to conduct desktop reviews of work complete photos in 2021 with respect to pole clearing activities.
- (d) Determining initiative completion or substantially complete status, was determined through taking the sum of the poles reported as cleared within calendar year 2020. The total number of poles cleared is based on information provided by the vegetation management contractors at time of invoicing. The total number of subject poles that are identified for clearing vary from year-to-year due to ongoing maintenance actions and new equipment installation. It is assumed, however that a similar number of poles will be cleared from one year to the next.
- (e) PacifiCorp does not have a system in place to efficiently track routine slash management activities and how slash was managed at each work location. Slash is managed by the vegetation management contractor in accordance with PacifiCorp's Standard Operating Procedures (SOP) and in accordance with any agreements with landowners or land managing agencies. PacifiCorp Senior Utility Forestry Arborists and the Utility Forestry Arborists would also note any non-conformance issues during post audits of completed work.

### WSD Data Request 2.3

**5.3.5.11: Patrol inspections of vegetation around distribution electric lines and equipment** In PacifiCorp’s 2021 WMP update, PacifiCorp stated that “In 2020, PacifiCorp inspected 1,059 miles of distribution line in HFTD,” as it pertains to PacifiCorp’s 2020 WMP initiative 5.3.5.11: Patrol inspections of vegetation around distribution electric lines and equipment (initiative 7.3.5.11 in PacifiCorp’s 2021 WMP Update).<sup>3</sup> PacifiCorp’s Q4 2020 Quarterly Initiative Update (QIU) states a total of 784 distribution line-miles have been patrolled.

- (a) Explain the difference in miles reported as completed between the 2021 WMP Update and Q4 2020 Quarterly Initiative Update (QIU).
- (b) Provide the raw data for the accurate mileage reference (either reported in WMP Update or Q4 QIU) in Microsoft Excel format supporting the completion of PacifiCorp’s distribution line-miles patrolled for 2020 WMP initiative 5.3.5.11.
- (c) Provide a list of all data inputs used to calculate initiative completion and the source of such data.
- (d) Explain what steps PacifiCorp took to validate the data identified in response to 4(b).
- (e) Explain the methodology, including any formulas and assumptions, PacifiCorp used to calculate initiative completion from the data inputs identified in response to 4(b).

### Response to WSD Data Request 2.3

The Company assumes that the references to “identified in response to 4(b)” is intended to be a reference to the data identified in the Company’s responses to subpart (b) of this request, WSD Data Request 2.3. Based on the foregoing assumption, the Company responds as follows:

- (a) Upon further review of the data provided, PacifiCorp identified that it has significantly under reported the completed work. Additionally, PacifiCorp has scrutinized the data recorded and identified further updates to more accurately represent the work completed in calendar year 2020 associated with patrols and corrections. During implementation of this work in 2020, PacifiCorp modified its approach to include patrols and correction work of on-cycle circuits (circuits scheduled for routine maintenance) in addition to off-cycle circuits. This modification resulted in complications in tracking completed work and the subsequent reporting errors regarding mileage completed as expressed in the Wildfire Mitigation Plan (WMP) updates. PacifiCorp has identified this as an area of improvement. Historically, tracking of work completed has been decentralized, however in 2021, PacifiCorp is implementing a process to gather information centrally to minimize

potential for error, which includes the vegetation management contractors reporting updates directly to PacifiCorp's work planning department rather than this information being reported on various spreadsheets at the forester level. PacifiCorp is also exploring the opportunity to include a miles completed reporting function within its vegetation management mobile data management software.

- (b) Based on the additional scrutiny and review of the data collected and reported from vegetation management contractors in calendar year 2020, as indicated in the Company's response to subpart (a) above, the miles of patrol inspections and correction work conducted in calendar year 2020 has been further revised and is 1,016 miles. Please refer to Attachment WSD 2.3, which provides the recorded number of miles inspected and corrected by circuit.
- (c) Scheduled work is identified in an Aggregated Work Plan. Vegetation management contractors provide progress updates (miles completed) relative to target in Microsoft Excel format which was used to update status provided in Attachment WSD 2.3. Production data (number of trees pruned and removed) is provided by the vegetation management contractors at the time of invoicing via a flat file that is uploaded to PacifiCorp's vegetation management database.
- (d) PacifiCorp's Senior Utility Forestry Arborists and Utility Forestry Arborists create the work plan/schedule, receive status updates from the vegetation management contractors, and conduct audits of the completed work to verify what is reported.
- (e) Total mileage for patrols and corrective work is calculated by filtering the columns in Attachment WSD 2.3 and then summing miles completed in column M as follows:
  - (1) Filter column H for "FPD" and "FMD" only ("FPD" is the work code used for patrols and correction work for on cycle circuits, and "FMD" is the work code used for patrols and correction work for off-cycle circuits).
  - (2) Filter column I for blank cells only (deselect "DST" and "DHS").
  - (3) Sum miles completed in column M (1,1015.63 or 1,016 miles rounded up).

## WSD Data Request 2.4

**5.3.5.12: Patrol inspections of vegetation around transmission electric lines and equipment** In PacifiCorp’s 2021 WMP update, PacifiCorp stated that “In 2020, PacifiCorp inspected 323 miles of distribution line in HFTD,” as it pertains to PacifiCorp’s 2020 WMP initiative 5.3.5.12: Patrol inspections of vegetation around transmission electric lines and equipment (initiative 7.3.5.12 in PacifiCorp’s 2021 WMP Update).<sup>4</sup> PacifiCorp’s Q4 2020 Quarterly Initiative Update (QIU) additionally states a total of 323 transmission line-miles have been patrolled.

- (a) Provide the raw data in Microsoft Excel format supporting the completion of 323 transmission line-miles patrolled, for 2020 WMP initiative 5.3.5.12.
- (b) Provide a list of all data inputs used to calculate initiative completion and the source of such data.
- (c) Explain what steps PacifiCorp took to validate the data identified in response to 5(b).
- (d) Explain the methodology, including any formulas and assumptions, PacifiCorp used to calculate initiative completion from the data inputs identified in response to 5(b).

## Response to WSD Data Request 2.4

The Company assumes that the references to “identified in response to 5(b)” is intended to be a reference to the data identified in the Company’s responses to subpart (b) of this request, WSD Data Request 2.4. Based on the foregoing assumption, the Company responds as follows:

- (a) Please refer to the Company’s response to WSD Data Request 2.3, specifically Attachment WSD 2.3, which provides the recorded number of miles inspected and corrected by transmission line.
- (b) Scheduled work is identified in an Aggregated Work Plan. Vegetation management contractors provide progress updates (miles completed) relative to target in Microsoft Excel format which was used to update status in Attachment WSD 2.3. Production data (number of trees pruned and removed) is provided by the vegetation management contractors at the time of invoicing via a flat file that is uploaded to PacifiCorp’s vegetation management database.
- (c) PacifiCorp’s Senior Utility Forestry Arborists and Utility Forestry Arborists create the work plan/schedule, receive status updates from the vegetation management contractors, and conduct audits of the completed work to verify what is reported.

(d) Total mileage for patrols and corrective work for transmission is calculated by filtering the columns in Attachment WSD 2.3 and then summing miles completed in column M as follows:

- (1) Filter column H for “FMT” only (“FMT” is the work code used for patrols and correction work for transmission).
- (2) Sum miles completed in column M (322.65 or 323 miles rounded up).