

EXHIBIT: PacifiCorp PAC_195
CPUC PROCEEDING: H.25-07-005
SPONSOR/WITNESS: PacifiCorp/Carrie Laird
DESCRIPTION: Response to CPUC SED Data
Request 1.6 – 1st Revised (SED-01-PacifiCorp
2020 WMP)
DATE IDENT. 6/9/2026 RECD. _____
ALJ: GERALD F. KELLY

PAC_195

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 “CaliforniaTierIIITierIIITracker_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.

PAC_195.02

OEIS Data Request 11.14

PacifiCorp's 2020 Wildfire Mitigation Plan - 2021 Substantial Vegetation Management (SVM) Audit

7.3.5.2 Detailed Inspections of Vegetation Around Distribution Electric Lines and Equipment – In its 2021 WMP, PacifiCorp states, “PacifiCorp conducts inspections of vegetation around distribution lines and equipment to identify imminent threats or hazards and vegetation conditions that do not comply PacifiCorp’s program standards/specifications. These pre-work inspections are typically conducted within weeks to 1-2 months by contractors prior to the scheduled program work. Inspectors/pre-listers utilize tablets to record vegetation conditions to be corrected....In 2021, PacifiCorp expects to inspect over 1,500 miles of distribution line associated with routine vegetation management.”¹ Regarding these statements, provide the following:

- (a) An Excel file with the following columns: distribution grid or distribution circuit name, program name, inspection date, miles inspected, vegetation management work date from 2021.
 - (i) If the total miles inspected under the routine program is less than 1,500 miles, explain why.
 - (ii) If there are instances of deviations between the inspection date and the vegetation management work date greater than 2 months, provide an explanation for why.
- (b) Examples of imminent vegetation threats or vegetation hazards identified during the routine inspection of distribution lines in 2021. Include the date the hazards were found, location, a description of the hazards, and the dates the hazards were remediated.
- (c) Provide the training or tailgate agenda showing inspectors utilized tablets to record vegetation conditions to be corrected in 2021.

Response to OEIS Data Request 11.14

- (a) Please refer to Attachment OEIS 11.14, specifically Attachment 1 - WE01012022_Contractor Miles Tracker_Distribution, which provides the total miles inspected in calendar year 2021 for distribution circuits scheduled to be worked (tab “Internal Tracker – Dist Program”, cell G13). Work code “DNT” represents inspection associated with the detailed inspection program.

¹ PacifiCorp’s 2021 WMP, page 159.

- (i) The total number of miles represented as inspected as part of the detailed inspection program in calendar year 2021 (cell G13) is 1,376 miles. Each year, circuits planned for work are inspected during Q4 of the previous year to allow vegetation management work to commence early in the year. Circuits 5G41, 5G45, 5G83 and 5R194 were inspected in calendar year 2020 and totaled approximately 95 miles. Adding this to the total inspected in calendar year 2021 equals 1,471 miles. The total of 1,500 miles was an estimate provided in PacifiCorp's 2021 Wildfire Mitigation Plan (WMP). As the vegetation management work plan continued to be refined, the planned miles to be completed was 1,476 (cell F13). There is a difference of five miles between actual miles completed (1,471 miles inspected) compared to plan (1,476 miles), reflecting five miles on Circuit 5R152 that was not completed in 2021 (cell G46). Those five miles on Circuit 5R152 were then rolled over into calendar year 2022 and completed in calendar year 2022.
- (ii) PacifiCorp generally targets up to two months from the date the inventory is conducted (work is identified) to when the work is completed. On average, PacifiCorp addressed areas identified during inventory within 40 calendar days. Please refer to Attachment OEIS 11.14, specifically Attachment 2 - PpWorkComplete_CA_2021_Distribution. Column D indicates the duration between inspection and correction date. There are several reasons why work may not be completed within two months of the inventory; including weather, customer refusals, specialized equipment needs, land managing agency requirements, environmental restrictions, and so forth. These factors are always present and may result in managed deviations from the targeted two-month timeframe.
- (b) PacifiCorp does not have documentation to provide regarding imminent vegetation threats or vegetation hazards. If such conditions are identified, they are generally communicated by telephone calls to dispatch tree crews to address the condition identified. PacifiCorp does not have a separate tracking system for imminent threat conditions. Records of the corrective work related to these conditions are embedded within the general vegetation management inventory and work complete documentation.
- (c) Please refer to Attachment OEIS 11.14, specifically Attachment 3 – PacifiCorp-Tree's LLC Meeting_01272021, which provides a copy of the meeting agenda with Trees LLC. Agenda items include discussion and use of tablets relative to the vegetation management program.

PAC_195.03

OEIS Data Request 11.14

PacifiCorp's 2020 Wildfire Mitigation Plan - 2021 Substantial Vegetation Management (SVM) Audit

7.3.5.2 Detailed Inspections of Vegetation Around Distribution Electric Lines and Equipment – In its 2021 WMP, PacifiCorp states, “PacifiCorp conducts inspections of vegetation around distribution lines and equipment to identify imminent threats or hazards and vegetation conditions that do not comply PacifiCorp’s program standards/specifications. These pre-work inspections are typically conducted within weeks to 1-2 months by contractors prior to the scheduled program work. Inspectors/pre-listers utilize tablets to record vegetation conditions to be corrected....In 2021, PacifiCorp expects to inspect over 1,500 miles of distribution line associated with routine vegetation management.”¹ Regarding these statements, provide the following:

- (a) An Excel file with the following columns: distribution grid or distribution circuit name, program name, inspection date, miles inspected, vegetation management work date from 2021.
 - (i) If the total miles inspected under the routine program is less than 1,500 miles, explain why.
 - (ii) If there are instances of deviations between the inspection date and the vegetation management work date greater than 2 months, provide an explanation for why.
- (b) Examples of imminent vegetation threats or vegetation hazards identified during the routine inspection of distribution lines in 2021. Include the date the hazards were found, location, a description of the hazards, and the dates the hazards were remediated.
- (c) Provide the training or tailgate agenda showing inspectors utilized tablets to record vegetation conditions to be corrected in 2021.

Response to OEIS Data Request 11.14

- (a) Please refer to Attachment OEIS 11.14, specifically Attachment 1 - WE01012022_Contractor Miles Tracker_Distribution, which provides the total miles inspected in calendar year 2021 for distribution circuits scheduled to be worked (tab “Internal Tracker – Dist Program”, cell G13). Work code “DNT” represents inspection associated with the detailed inspection program.

¹ PacifiCorp’s 2021 WMP, page 159.

- (i) The total number of miles represented as inspected as part of the detailed inspection program in calendar year 2021 (cell G13) is 1,376 miles. Each year, circuits planned for work are inspected during Q4 of the previous year to allow vegetation management work to commence early in the year. Circuits 5G41, 5G45, 5G83 and 5R194 were inspected in calendar year 2020 and totaled approximately 95 miles. Adding this to the total inspected in calendar year 2021 equals 1,471 miles. The total of 1,500 miles was an estimate provided in PacifiCorp's 2021 Wildfire Mitigation Plan (WMP). As the vegetation management work plan continued to be refined, the planned miles to be completed was 1,476 (cell F13). There is a difference of five miles between actual miles completed (1,471 miles inspected) compared to plan (1,476 miles), reflecting five miles on Circuit 5R152 that was not completed in 2021 (cell G46). Those five miles on Circuit 5R152 were then rolled over into calendar year 2022 and completed in calendar year 2022.
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- (c) Please refer to Attachment OEIS 11.14, specifically Attachment 3 – PacifiCorp-Tree's LLC Meeting_01272021, which provides a copy of the meeting agenda with Trees LLC. Agenda items include discussion and use of tablets relative to the vegetation management program.

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	A	B	C	D	E	F	G	H	I
1	State	District	Grid Name	Miles	Work Type	Work Code Description	Status	Tree Work Miles Complete	Tree Work % Complete
2	California	Yreka	4G1	25.79	DST	Dist CYCLE Trim	Complete	25.79	100%
3	California	Yreka	5G1	53.67	DST	Dist CYCLE Trim	Complete	53.67	100%
4	California	Yreka	5G14	4.55	DST	Dist CYCLE Trim	Complete	4.55	100%
5	California	Yreka	5G149	54.01	DST	Dist CYCLE Trim	Complete	54.01	100%
6	California	Yreka	5G151	9.73	DHS	Dist INTERIM Trim	Complete	9.73	100%
7	California	Yreka	5G16	36.85	DHS	Dist INTERIM Trim	Complete	36.85	100%
8	California	Yreka	5G163	11.33	DHS	Dist INTERIM Trim	Complete	11.33	100%
9	California	Yreka	5G23	96.79	DHS	Dist INTERIM Trim	Complete	96.79	100%
10	California	Yreka	5G39	24.67	DHS	Dist INTERIM Trim	Complete	24.67	100%
11	California	Yreka	5G41	88.17	DST	Dist CYCLE Trim	Working	65	74%
12	California	MtShasta	5G45	8.27	DST	Dist CYCLE Trim	Working	5	60%
13	California	Yreka	5G5	10.37	DST	Dist CYCLE Trim	Complete	10.37	100%
14	California	MtShasta	5G69	11.66	DST	Dist CYCLE Trim	Working	11.5	99%
15	California	Yreka	5G7	66.36	DHS	Dist INTERIM Trim	Complete	66.36	100%
16	California	MtShasta	5G83	80.00	DHS	Dist INTERIM Trim	Working	30	38%
17	California	Alturas	5L97	18.60	DST	Dist CYCLE Trim	Complete	18.60	100%
18	California	Tulelake	5L20(A)	24.59	DST	Dist CYCLE Trim	Complete	24.59	100%
19	California	Tulelake	5L62	57.30	DST	Dist CYCLE Trim	Complete	57.30	100%
20	California	Tulelake	5L63	37.62	DST	Dist CYCLE Trim	Complete	37.62	100%
21	California	Tulelake	5L73	26.51	DHS	Dist INTERIM Trim	Complete	26.51	100%
22	California	Tulelake	5L78	79.72	DST	Dist CYCLE Trim	Complete	79.72	100%
23	California	CrescentCity	5R106C	3.40	DST	Dist CYCLE Trim	Complete	3.40	100%
24	California	CrescentCity	5R170	18.43	DST	Dist CYCLE Trim	Complete	18.43	100%
25	California	CrescentCity	5R147	13.98	DST	Dist CYCLE Trim	Working	12.42	89%
26	California	CrescentCity	5R160	11.50	DST	Dist CYCLE Trim	Complete	11.50	100%
27	California	CrescentCity	5R171	20.09	DST	Dist CYCLE Trim	Complete	20.09	100%
28	California	CrescentCity	5R194	18.55	DHS	Dist INTERIM Trim	Working	0.18	1%
29	California	MtShasta	6G101	4.16	DHS	Dist INTERIM Trim	Complete	4.16	100%
30	California	CrescentCity	6R3	7.00	DST	Dist CYCLE Trim	Complete	7.00	100%
31	California	MtShasta	7G71	4.02	DST	Dist CYCLE Trim	Complete	4.02	100%
32	California	MtShasta	7G73	2.01	DST	Dist CYCLE Trim	Complete	2.01	100%
33	California	MtShasta	7G75	3.54	DST	Dist CYCLE Trim	Complete	3.54	100%
34	California	Yreka	8G25	52.39	DST	Dist CYCLE Trim	Complete	52.39	100%
35	California	Yreka	8G27	5.00	DST	Dist CYCLE Trim	Complete	5.00	100%
36	California	MtShasta	8G40	0.12	DST	Dist CYCLE Trim	Complete	0.12	100%
37	California	MtShasta	8G65	5.99	DST	Dist CYCLE Trim	Complete	5.99	100%
38	California	MtShasta	8G95	8.43	DST	Dist CYCLE Trim	Complete	8.43	100%
39	TOTAL							909	