Exhibit Number:	:	SED-40
CPUC Proceeding	:	H.25-07-005
Sponsor	:	SED
Witness	:	Ed Pike
Date Ident.	:	
Recd.	:	
Admin. Law Judge	:	Gerald F. Kelly

SAFETY ENFORCEMENT DIVISION
California Public Utilities Commission

PacifiCorp Responses CA 2021-WMPs SED Set 3 (1-14)

San Francisco, California
May 2026

PACIFIC POWER
A DIVISION OF PACIFICORP

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January 16, 2025

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Re: CA 2021-WMPs
CPUC SED Set 3 (1-14)

Please find enclosed PacifiCorp's responses to CPUC SED data requests 3.1-3.14 and Attachments.

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

Sincerely,

___/s/___
Pooja Kishore
Manager, Regulation

CPUC SED Data Request 3.1

Provide a table that includes, for all covered conductor segments originally scheduled for installation between 2019 and 2024, the information shown in Table 1.

Table 1: Covered Conductor Information

			Completion date			PacifiCorp WMP goals	
Circuit	**Segment**	**Length**	**Original**	**Actual**	**Source of Completion Date**	**Year(s) segment was included in WMP goals**	**Reference**
example 1							
example 2							
etc.							

Response to CPUC SED Data Request 3.1

Please refer to Attachment CPUC SED 3.1-1 which provides PacifiCorp's completed Table 1 (Covered Conductor Information). Please refer to Attachment CPUC SED 3.1-2 which provides supporting documents.

Please refer to the definitions provided below for some of the column headers in Attachment CPUC SED 3.1-1:

- Segment – The segment is provided as the Grid hardening ID (GhID).
- Length – Lengths of segments are provided in miles rounded to the nearest tenth of a mile.
- Completion dates:
  - Original completion – An appropriations request (APR) describes the high-level project scope, schedule, and budget. The original APR for each project is provided in Attachment CPUC SED 3.1-2 to document the original completion date.
  - Actual Completion date – Actual completion dates are listed for those with dates either from the quarterly data reports (QDR) or pulling section tracker.
  - Source of Completion Date – This lists the document used for completion date. Please refer to column O (Document and page number) which provides the specific reference.

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- Year(s) Segment was included in PacifiCorp wildfire mitigation plan (WMP) goals – This provides the years including the original completion date year. Projects that were not completed in the original plan year were assumed to be targeted in subsequent years unless there was a known permitting delay that moved target completion out multiple years.

- Reference PacifiCorp WMP goals – The APR for each project is provided documenting the original completion date.

- Notes – This provides notes on projects that were split for reporting purposes and projects delayed due to permitting.

- Pulling section tracker start date – The start date is listed as the earliest date on the pulling section tracker for the project as reported by the contractor. This is the date the first segment was energized and is generally many days after construction work has started for activities such as civil, setting poles, and pulling conductor.

- Pulling section tracker end date – The final date on the pulling section tracker for the project as reported by the contractor.

- QDR start date – The start date listed in the QDR for the segment.

- QDR end date – The end date listed in the QDR for the segment.

- Document and page number – Item 1 lists the pulling section tracker reference document. Item 2 lists the QDR reference document. These documents are provided in Attachment CPUC SED 3.1-2.

- Reason for discrepancy – This provides an explanation for the differences between pulling section tracker and QDR dates.

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CPUC SED Data Request 3.2

Provide a copy of PacifiCorp's presentation for the SED-PacifiCorp meeting regarding covered conductor on November 14, 2024.

Response to CPUC SED Data Request 3.2

Please refer to Attachment CPUC SED 3.2.

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CPUC SED Data Request 3.3

SED-02 Q5 requested that PacifiCorp explain why it did not identify any discussion of proposed corrective actions regarding Initiative 7.3.3.3 Covered Conductor Installation in PacifiCorp's 2021 Annual Report on Compliance (PacifiCorp's ARC) nor in PacifiCorp's 2021 Q4 QIU. PacifiCorp's response SED-02 Q5 did not address either of these two documents.

(a) Explain why PacifiCorp's 4th Quarter QIU and PacifiCorp's ARC did not address corrective action for this Initiative.

(b) Explain why PacifiCorp's response to SED-02 Q5 did not address PacifiCorp's 4th Quarter QIU and PacifiCorp's ARC and lack of reporting regarding this Initiative in these two documents.

Response to CPUC SED Data Request 3.3

(a) PacifiCorp's 2021 Q4 Quarterly Initiative Update (QIU) report and PacifiCorp's 2021 Annual Report on Compliance (ARC) addressed corrective actions for Initiative 7.3.3.3 (Covered Conductor Installation) by referencing the change order provided with the Company's response to CPUC SED Data Request 2, specifically Attachment CPUC SED 2.2.

PacifiCorp's 2021 Q4 2021 QIU included the following in cell AB7:

"Change Order Submitted to Re-Phase; Additional Contractor Resources added to move projects along faster".

PacifiCorp's 2021 ARC also references the Change Order on page 6:

Category: Grid Design and System Hardening					
Installation of Covered Conductor	7.3.3.3	Change to timeline / Increase in cost	Shift 56 miles from 2021 into Q1/Q2 of 2022 and increased funding based on 2021 experience	The proposed change reflects actual costs and more accurate forecasted values based on the actual costs experienced to date. While the total number of miles planned for completion has not changed, the proposed change also reflects more attainable targets for completion in 2021.	$44.7M increase to reflect more accurate forecasts and costs and shift 56 miles from 2021 to Q1/Q2 2022

(b) While PacifiCorp's 2021 Q4 QIU report and PacifiCorp's 2021 ARC did not provide any new information to what was provided in the Change Order, they should have been referenced as additional documents that had corrective action plan information.

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CPUC SED Data Request 3.4

PacifiCorp's response to SED-01 Q3 states that a fire occurred March 4, 2021, within one quarter mile of circuit 5G83 segment 8077663 due to "Contact from object, External Force." PacifiCorp's response to SED-02 Q4 states "According to the incident notes, a vehicle made contact with a conductor where it crossed the road. The vehicle contact caused the wire to come down, which then caused the ignition."

(a) State the latitude and longitude of the two poles of segment 8077663 closest to the ignition origin.

(b) State the distance of segment 8077663 from the ignition origin.

(c) Confirm that the section of segment 8077663 closest to the ignition was scheduled for replacement with the rest of segment 8077663. If not scheduled, explain why this location was not included in the segment 8077663 covered conductor installation.

Response to CPUC SED Data Request 3.4

(a) Please refer to the table below which provides the latitude and longitude information of the poles of segment 8077663 closest to the ignition origin:

Pole number	Latitude	Longitude	GhIDs	Approximate distance
06242005.0361462	41.442577528355	-122.379446725974	8003684 8003685	150’
06242005.0361401	41.4419254229258	-122.379451783595	8003684 8077663	110’

Please refer to the figure below which provides the location of the ignition origin relative to the circuit segments and poles referenced in the table provided above:

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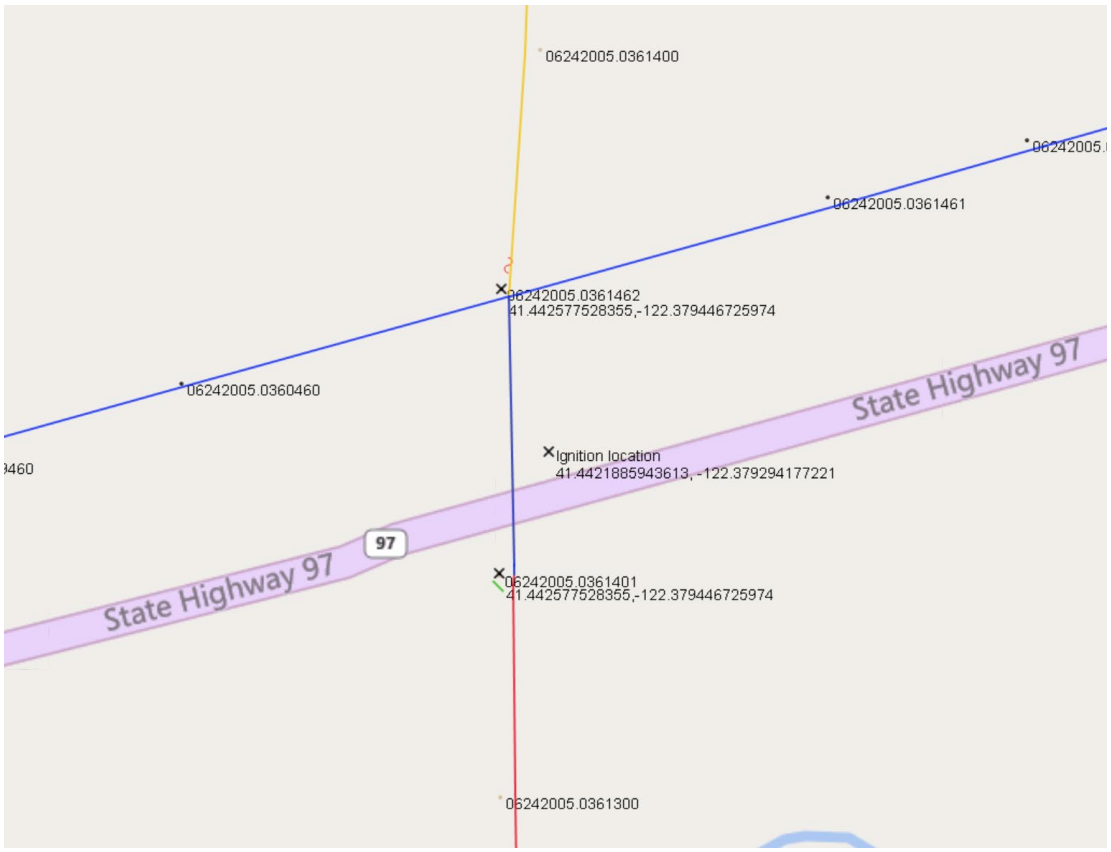

Notes:

- Blue line is segment 8003684
- Yellow line is segment 8003685
- Red line is segment 8077663

(b) Please refer to the table provided in the Company's response to subpart (a) above.

(c) Please refer to the map provided in the Company's response to subpart (a) above. Segment 8003684 included the conductor closest to the reported ignition as well as replacement of both poles nearest to the ignition. Segment 8077663 included the conductor from pole 0624005.0361401 south to pole 06242005.0361300 and into the residential neighborhood to the south. Both segment 8003684 and segment 8077663 are fully within Tier 2. Segment 8003684 was set as a higher priority because it is the electrical source for the area served by segment 8077663 and generally had greater exposure to vegetation.

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CPUC SED Data Request 3.5

Provide the following regarding a November 10, 2022, ignition at 1811 Elk Ck Rd, Happy Camp. PacifiCorp stated that the ignition occurred within one-quarter mile of circuit 5G16 segment 8003682 due to a "3rd party."

(a) State the following:

i. The distance of the ignition origin from the closest part of segment 8003682.

ii. The name and location (latitude and longitude) of the two poles closest to the ignition and their distance from the ignition.

iii. Identify the 3rd party that caused this ignition and explain how they caused this ignition.

(b) Provide the following regarding covered conductor installation for this segment 8003682.

i. Provide the planned and actual completion date (date, month and year) of covered conductor installation.

ii. Provide all Documents that verify the actual completion date and specify relevant page numbers.

Response to CPUC SED Data Request 3.5

(a) Please refer to the Company's responses to subparts i. through iii. below:

i. Please refer to the table below which provides the latitude and longitude information of the poles of segment 8003682 closest to the ignition origin:

Pole number	Latitude	Longitude	GhID	Approximate distance (feet)
07116007.0142300	41.7753656633825	-123.379753907707	N/A	460'
07116007.0142301	41.7751987616912	-123.37995874139	8003682	520'
07116007.0142302	41.7759144557124	-123.380774282909	8003682	780'

Pole 07116007.014230 is a secondary pole and was not included in the scope of the covered conductor project. Based on this the nearest location on segment

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8003682 to the reported ignition location was pole 07116007.0142301 at 520 feet.

Please refer to the figure below which provides the location of the ignition origin relative to the circuit segments and poles referenced in the table provided above:

ii. Please refer to the Company's response to subpart (a)(i) above.

iii. PacifiCorp does not have the identification of the individual(s) or entity responsible for this ignition or the cause of the third-party ignition.

(b) Please refer to the Company's responses to subparts i. and ii. below:

i. Planned completion date for segment 8003682 was December 16, 2021. The project was verified complete on December 30, 2022.

ii. Please refer to Attachment CPUC SED 3.5, specifically file "Grid hardening log file 2022Q4", row 14, cells G and H which show the start date and end date for segment 8003682.

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CPUC SED Data Request 3.6

PacifiCorp incorrectly claimed in response to SED-01 Q2(e) that specific documents show completion of 13 covered conductor segment installation (see list below). The documents do not actually contain this information for the 13 segments. SED-02 Q7(a) requested that PacifiCorp explain the reason(s) for the errors but PacifiCorp did not provide such information.

- 8318408 (missing from Attach 2-7)
- 8318443 (missing from Attach 2-7)
- 8283736 (missing from Attach 2-6)
- 8278398 (missing from Attach 2-6)
- 8283496 (missing from Attach 2-6)
- 8280147 (missing from Attach 2-6)
- 6810394 ("in progress" see Attach 2-7)
- 8003682 (missing from Attach 2-7)
- 8003679 ("In progress" see Attach 2-9 row 7)
- 6810408 ("In progress" see Attach 2-9 row 2)
- 7047081 (missing from Attach 2-9)
- 8304727 (missing from Attach 2-9)
- 8003685 (missing see Attach 2-9)

(a) Explain why PacifiCorp's response to SED-02 Q7(a) was not responsive to SED's request that PacifiCorp provide the reasons for PacifiCorp's incorrect response to SED-01 Q2(e).

(b) As requested by SED-02 Q7(a), explain why PacifiCorp's response to SED-01 Q2(e) contains the 13 incorrect claims noted above.

(c) Describe PacifiCorp policies and procedures for ensuring that responses to SED data requests are accurate. Provide all Related Documents and state all relevant page numbers.

Response to CPUC SED Data Request 3.6

(a) PacifiCorp objects that the request is argumentative. The Company believes that the response to CPUC SED Data Request 2.7 subpart (a) adequately addressed the question by providing the correct information to the original question (CPUC SED Data Request 1.2 subpart (e)).

(b) The error in the Company's response to CPUC SED 1.2 subpart (e) was a clerical error.

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(c) PacifiCorp objects that the request is argumentative. Substantial resources are dedicated to delivering accurate responses to all data requests, including those made by SED. When a data request is received, the request is typically assigned to a subject matter expert with particular knowledge or expertise relevant to the subject of the request. The subject matter expert is primarily responsible for preparing the response and will review the response for accuracy throughout the process of drafting the response. In preparing the response, the subject matter expert may refer to company business records kept in the normal course and may consult, as needed, with other employees in the company with related information or expertise. When a data request extends beyond a request for data kept in the normal course of business, the company typically endeavors to respond, by referring to data maintained by the company. When the subject matter expert has to create a new compilation or other work product to provide a substantive response, the subject matter expert continues to check for accuracy, but there is, however, a greater chance for error when new work product is created.

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CPUC SED Data Request 3.7

PacifiCorp stated in response to SED-02 Q7 that "The dates within [the Pulling Section Tracker] can vary from the reported progress communicated to PacifiCorp during periodic construction meetings that was used to determine the start and end dates as reported in the quarterly data reports."

(a) Provide the following information for any segments of covered conductor where the Pulling Section Tracker dates vary from the start and end dates as reported in the quarterly data reports. Also provide all Related Documents and state relevant page numbers:

- Segment;
- Actual start and end date; and
- Start and end date reported in quarterly data reports.

(b) Explain, for any such segments described in response to SED-02 (a), the reason for the discrepancy between the start and/or end dates reported in PacifiCorp QIUs and the actual dates as reported in the Pulling Section Tracker.

Response to CPUC SED Data Request 3.7

(a) Please refer to the Company's response to CPUC SED 3.1, specifically Attachment CPUC SED 3.1-1, tab "Table 1" and the columns referenced below:

- Segment: column C
- Actual start and end date; and: columns K and L provided pulling section reported start and end dates.
- Start and end date reported in quarterly data reports: columns M and N provide reported start and end dates from quarterly data reports (QDR).

column Q provides the refence document for pulling section tracker and QDR related to the segment.

(b) Please refer to Attachment CPUC SED 3.1-1, specifically tab "Table 1", column P includes the reasons for differences between pulling section tracker dates and QDR dates.

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CPUC SED Data Request 3.8

PacifiCorp stated in response to SED-02 Q9(b) that in 2021, PacifiCorp reviewed pole clearing activities in conjunction with WMP initiative post-audits that did not focus on pole clearing; and that PacifiCorp implemented a separate pole clearing audit process in 2022.

(a) Describe PacifiCorp procedures implemented in 2021 for QA/QC of pole clearing. Provide all Related Documents and sate relevant page numbers.

(b) Describe and provide all Documents that show that PacifiCorp implemented QA/QC for pole clearing in 2021. State relevant page numbers.

(c) Describe PacifiCorp procedures implemented in 2022 for QA/QC of pole clearing. Provide all Related Documents and state relevant page numbers.

(d) Describe and provide any Documents that show that PacifiCorp implemented QA/QC for pole clearing in 2022 and state relevant page numbers.

(e) Describe PacifiCorp procedures in 2022 for QA/QC of contractor work regarding equipment installation and maintenance. Provide all Related Documents and state relevant page numbers.

Response to CPUC SED Data Request 3.8

(a) During quality assurance (QA) / quality control (QC) of tree work conducted (tree work resulting from detailed and patrol inspections), PacifiCorp auditors included cursory review of poles that were cleared at the time of the field audit. If the auditor identified any significant work quality issues, the auditor would communicate this to the pole clearing contractor for review and correction. Note: specific pole clearing procedures or audit targets were not developed or tracked in 2021.

(b) As stated in the Company's response to subpart (a) above, pole clearing audits were not formalized in 2021, therefore, documentation explicitly indicating review of pole clearing is not readily available. Any findings regarding pole clearing deficiencies typically would have been communicated to contractors via conversations or conference call meetings at the time.

(c) In 2022, PacifiCorp implemented a process to conduct a sample audit of the pole clearing program associated with PacifiCorp's 2021 Wildfire Mitigation Plan (WMP), initiative 7.3.5.5.1 (Expanded Pole Clearing). PacifiCorp set a target of 20 poles or 10 percent, whichever is greater, per circuit where poles were cleared associated with this WMP initiative. Please refer to Attachment CPUC SED 3.8-1 which provides correspondence documenting the establishment of the process. Please refer to

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Attachment CPUC SED 3.8-2 which provides a copy of the pole clearing audit tracker for 2022 referred to in Attachment CPUC SED 3.8-1.

(d) Please refer to Attachment CPUC SED 3.8-2 which provides a copy of the pole clearing audit tracker for 2022. In addition, please refer to Attachment CPUC SED 3.8-3 which provides an example of an audit report containing findings of expanded pole clearing conducted in 2022. Note: refer to column H for a description of audit exception type.

(e) PacifiCorp requires contractors to follow documented industry standards, and the installation specifications set forth in PacifiCorp's construction standards.

Covered Conductor:

In Q1 2022 and Q2 2022, PacifiCorp had an informal QA / QC process for covered conductor projects. The informal QA / QC process included spot checks by the project manager, operations manager, field engineer or other local staff.

The covered conductor manufacturer completed a post-construction inspection as the final check. Please refer to Attachment CPUC SED 3.8-4 which provides an example of an inspection report.

Starting in July 2022, PacifiCorp added full-time construction inspectors to support covered conductor projects. These inspectors used a standard form for each pulling section. Please refer to Attachment CPUC SED 3.8-5 which provides a sample form.

System Automation:

System Automation projects in 2022 included post-installation commissioning forms. Please refer to Attachment CPUC SED 3.8-6 through Attachment CPUC SED 3.8-8 which provide examples of post-installation commissioning forms.

Expulsion Fuse Replacements:

Expulsion fuses replaced while completing line rebuild projects were inspected as part of those installations as outlined above.

Expulsion fuses replaced separate from line rebuild projects in 2022 had only informal QA / QC processes. The processes included spot checks by the project manager, operations manager, field engineer or other local staff. Post-construction inspections were added in 2023.

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CPUC SED Data Request 3.9

PacifiCorp's response to SED-02 Q10(c) regarding distribution circuit vegetation management states "5G40 DHS Trees PpWorkCompleted_2021 .. shows that [t]he corrective maintenance was conducted June to November 2021." PacifiCorp also stated in response to SED-02 Q10(c) that "PacifiCorp counted the detailed inspections of circuits … 5G40 as part of initiative 7.3.5.2".

(a) State the beginning and end of the high fire threat season for Circuit 5G40 in 2021 (if multiple dates apply to the circuit, state each along with the corresponding area). Provide all Related Documents and state relevant page numbers.

(b) State whether PacifiCorp completed all vegetation corrective work for 5G40 prior to the height of the fire season. If not, explain why not. Provide all Related Documents and state relevant page numbers.

(c) State whether any PacifiCorp policies and/or procedures effective in 2021 required the completion of vegetation management work in High Fire Threat Districts (HFTD) (in response to issues noted during distribution circuit inspections) prior to the beginning of the high fire threat season. If so, provide all Related Document(s) and state relevant page numbers.

(d) If PacifiCorp did not adopt such policies and/or procedures identified in SED-02 Q9(c), explain why not.

(e) State whether any PacifiCorp policies and/or procedures effective in 2024 require the completion of vegetation management work in HFTD (in response to issues noted during distribution circuit inspections) prior to the beginning of the high fire threat season. If so, provide all Related Document(s) and state relevant page numbers.

Response to CPUC SED Data Request 3.9

(a) Distribution circuit 5G40 is within PacifiCorp's Yreka district in California. PacifiCorp identified the start and end dates of the fire season for the Yreka district in 2021 as follows:

- Start date: June 11, 2021
- End date: October 8, 2021

(b) As stated in the Company's response to CPUC SED 2.10 subpart (c), corrective maintenance based on the inspection conducted on circuit 5G40 in 2021 was completed June 2021 through November 2021. Corrective maintenance was initiated after the inspection was concluded in June 2021. PacifiCorp's 2021 wildfire mitigation plan (WMP) initiative 7.3.5.11 refers to conducting patrols (visual

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inspection) of distribution lines within high fire threat districts prior to the height of the fire season. Based on this patrol, any imminent vegetation conditions that may pose significant ignition risk would be addressed in conjunction with the patrol taking place. With respect to circuit 5G40, the schedule was changed to replace with patrol with the detailed inspection that was scheduled for later in the year. The detailed inspection (cycle maintenance inspection) is a broader scope of work compared to a patrol, and it generally takes a longer duration to complete all corrective work identified. Any imminent conditions would have been addressed prior to the height of the fire season, however, not all work identified in accordance with the detailed inspection scope was completed prior to the height of the fire season. Please refer to the Company's response to CPUC SED Data Request 2.10, specifically Attachment CPUC SED 2.10, files "5G40_DNT_Trees_Inventory_2021" and "5G40 DHS Trees PpWorkCompleted_2021" which provide data on inspection and work competed.

(c) In accordance with the 2021 WMP, PacifiCorp conducted an inspection, or readiness patrol, prior to the height of the fire season. In the event the inspector identified any imminent conditions, they notified the applicable PacifiCorp forester, and a tree crew would be dispatched to address the condition.

(d) CPUC SED Data Request 2.9 does not have a subpart (c). Therefore, PacifiCorp is unable to respond to this question.

(e) In accordance with the 2023 WMP, which was effective in 2024, PacifiCorp conducted patrol inspection consistent with section 8.2.2.3 of the WMP. PacifiCorp identified patrol inspection mileage targets by quarter for distribution as presented in Table 8-16, page 186 of the 2023 WMP. In addition, PacifiCorp set targets for completion of quality assurance / quality control (QA / QC) post-audits by quarter as presented in Table 8-16, page 187. In order to complete post-audits, corrective maintenance actions must be completed in advance of the post-audit.

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CPUC SED Data Request 3.10

Provide the following information regarding any ignition in 2021 or 2022 within one quarter mile of circuit 5G40. Complete Table 2 below:

Table 2– Ignition information

Circuit	Conductor segment	Ignition GPS coordinates	Ignition Geographic location	Ignition date and time	Ignition cause	List any damages (injuries, fatalities, property damage)	Size (acres)	Did Fire Authority issue a report?
Example								
Example								

(a) If the fire authority issued a report, provide a copy of such report.

(b) If PacifiCorp reported the ignition to the Commission, provide a copy of such report.

Response to CPUC SED Data Request 3.10

PacifiCorp objects to the extent that the request calls for information protected by the attorney-client privilege and the attorney work product doctrine. PacifiCorp objects that the term "any ignition" is vague and ambiguous. There may be fire ignitions within a quarter mile of circuit 5G40 not involving electrical facilities of which PacifiCorp is not aware. There are also fire incidents involving unknown and disputed causes, which may or may not involve electrical facilities. In making this response, PacifiCorp assumes that "any ignition" correlates to the fire incidents which are already reported annually to the Commission under D.14-02-015 and the annual Fire Incident Data Collection Plan. These reported incidents include incidents where involvement of electrical facilities is alleged, and PacifiCorp denies causation is attributable to electrical facilities where the cause is unknown and under investigation. For reported incidents within one quarter mile of Circuit 5G40, please refer to the completed Table 2 (Ignition information) provided below:

Circuit	Conductor segment	Ignition GPS coordinates	Ignition Geographic location	Ignition date and time	Ignition cause	List any damages (injuries, fatalities, property damage)	Size (acres)	Did Fire Authority issue a report?
5G40	7011422	41.76, -123.01	28141 Scott River Rd.; Scott Bar, CA	07/30/2021 03:14 PM	Object Contact	None reported	.75	No
5G40	8262481	41.84, -122.87	Near 25421 Walker Rd.; Klamath River, CA	07/29/2022 03:21 PM	Unknown	185 structures, 4 fatalities	60,138	Yes
5G40	7011438	41.70,-123.05	Scott River Rd.; Scott Bar, CA	08/11/2022 1:00 PM	Vegetation Contact	None reported	15	No

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(a) Please refer to Attachment CPUC SED 3.10-1 and Attachment CPUC SED 3.10-2.

(b) Please refer to Attachment CPUC SED 3.10-3.

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CPUC SED Data Request 3.11

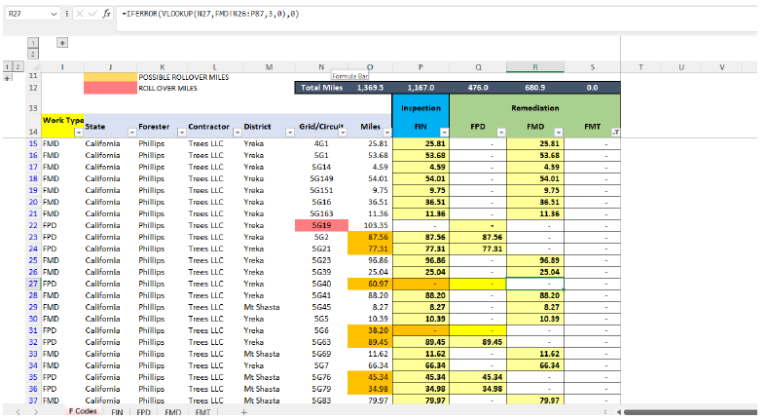
PacifiCorp provided "Attachment CPUC SED 10-1" in response to SED-01 Q10 (See Figure 1 below with a screenshot displaying part of the "F codes" tab). Add the following information to the "F codes" tab of the file and provide the updated file to SED:

(a) The start (add to column T) and end date (add to column U) of distribution detailed vegetation inspections.

(b) The start (add to column V) and end date (add to column W) of all vegetation corrective work based on such inspections.

(c) The start (add to column X) and end date (add to column Y) of any additional vegetation corrective work completed due to PacifiCorp audit of distribution circuit vegetation corrective work.

Figure 1 – Screen shot of Attach CPUC SED 10-1.xsls



R27 =IFERROR(VLOOKUP(N27,FMD!N26:P87,3,0),0)

POSSIBLE ROLLOVER MILES
ROLL OVER MILES

Total Miles	1,369.5	1,167.0	476.0	680.9	0.0

							Inspection	Remediation		
Work Type	State	Forester	Contractor	District	Grid/Circui*	Miles	FIN	FPD	FMD	FMT
FMD	California	Phillips	Trees LLC	Yreka	4G1	25.81	25.81	-	25.81	-
FMD	California	Phillips	Trees LLC	Yreka	5G1	53.68	53.68	-	53.68	-
FMD	California	Phillips	Trees LLC	Yreka	5G14	4.59	4.59	-	4.59	-
FMD	California	Phillips	Trees LLC	Yreka	5G149	54.01	54.01	-	54.01	-
FMD	California	Phillips	Trees LLC	Yreka	5G151	9.75	9.75	-	9.75	-
FMD	California	Phillips	Trees LLC	Yreka	5G16	36.51	36.51	-	36.51	-
FMD	California	Phillips	Trees LLC	Yreka	5G163	11.36	11.36	-	11.36	-
FPD	California	Phillips	Trees LLC	Yreka	5G19	103.35	-	-	-	-
FPD	California	Phillips	Trees LLC	Yreka	5G2	87.56	87.56	87.56	-	-
FPD	California	Phillips	Trees LLC	Yreka	5G21	77.31	77.31	77.31	-	-
FMD	California	Phillips	Trees LLC	Yreka	5G23	96.86	96.86	-	96.89	-
FMD	California	Phillips	Trees LLC	Yreka	5G39	25.04	25.04	-	25.04	-
FPD	California	Phillips	Trees LLC	Yreka	5G40	60.97	-	-	-	-
FMD	California	Phillips	Trees LLC	Yreka	5G41	88.20	88.20	-	88.20	-
FMD	California	Phillips	Trees LLC	Mt Shasta	5G45	8.27	8.27	-	8.27	-
FMD	California	Phillips	Trees LLC	Yreka	5G5	10.39	10.39	-	10.39	-
FPD	California	Phillips	Trees LLC	Yreka	5G6	38.29	-	-	-	-
FPD	California	Phillips	Trees LLC	Yreka	5G63	89.45	89.45	89.45	-	-
FMD	California	Phillips	Trees LLC	Mt Shasta	5G69	11.62	11.62	-	11.62	-
FMD	California	Phillips	Trees LLC	Yreka	5G7	66.34	66.34	-	66.34	-
FPD	California	Phillips	Trees LLC	Mt Shasta	5G76	45.34	45.34	45.34	-	-
FPD	California	Phillips	Trees LLC	Mt Shasta	5G79	34.98	34.98	34.98	-	-
FMD	California	Phillips	Trees LLC	Mt Shasta	5G83	79.97	79.97	-	79.97	-

F Codes | FIN | FPD | FMD | FMT

Response to CPUC SED Data Request 3.11

Please refer to Attachment CPUC SED 3.11-1, tab “F codes” , columns T through Y.

Please refer to Attachment CPUC SED 3.11-2 which provides, where readily available, inventory reports, work complete reports, audit exception completion reports, and forester audit completion forms, used to identify dates entered into Attachment CPUC SED 3.11-1. Note: completion dates entered into Attachment CPUC SED 3.11-1 may not reflect the substantial completion date of the work as the date entered may reflect work locations that required additional planning, specialized equipment, permitting, or customer refusal resolution.

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- Inventory reports contain dates of when the first and last work locations were identified during the inspection.
- Work complete reports contain dates of when the first and last work locations were completed and identifies whether the work was completed associated with an audit exception.
- Audit exception completion reports dates of when the first and last audit locations were addressed/completed.

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CPUC SED Data Request 3.12

SED-02 Q11(b) requested that "If PacifiCorp failed to report progress on this measure [7.3.7.1 Data Governance - Develop a Data Governance Plan & Make Progress on Data Mapping] in its Annual Report on Progress and/or QIU, explain why." PacifiCorp's November 14, 2024, response to SED-02 Q11(b) claimed that the question was "Not applicable" while implicitly acknowledging[1] that it did not report on this initiative in a QIU.

Explain why PacifiCorp did not report the status of progress on this Initiative in its QIU for the 4th quarter of 2021.

Response to CPUC SED Data Request 3.12

The Company did not originally include in its response to CPUC SED Data Request 2.11 subpart (a) that tracking was also included in the Q4 2021 Quarterly Initiative Update (QIU) under initiative ID DG-1. PacifiCorp provided financial progress on this initiative in the QIU.

[1] SED-02 Q11(a) requested in part that PacifiCorp state whether it reported on this Initiative in its QIU, and if so to provide all Related Documents. PacifiCorp did not identify any QIU reporting in response to SED's request.

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 3.13

SED-02 Q13(b) asked "Explain why PacifiCorp's Annual Report on Compliance did not specifically address whether PacifiCorp achieved progress towards establishing effective risk assessment and mapping capabilities." However, PacifiCorp's November 14, 2024, response to SED-02 did not address whether PacifiCorp completed this deliverable or any tangible progress towards this deliverable.

Explain why PacifiCorp's ARC did not specifically address whether PacifiCorp achieved tangible progress towards accomplishing this goal.

Response to CPUC SED Data Request 3.13

Per the instructions and guidance on the 2021 Annual Report on Compliance (ARC) submissions, discussion of individual initiative progress and accomplishments was not a requirement; however, the Company generally discussed the overall progress of implementing all of its initiatives in Section A. Since risk assessment and mapping was not associated with a change order or a significant variance in planned and actual expenditures, the risk assessment and mapping progress would not be discussed in the 2021 ARC.

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 3.14

PacifiCorp committed to installing 22 devices under the Continuous Monitoring Sensors pilot (Initiative 7.3.2.3) but completed installation of only two.

(a) Explain why PacificCorp reduced the scope of this initiative from 22 devices in 2021 to two devices in 2021 and two in 2022 followed by a data gathering period.

(b) State the date that PacifiCorp installed each device under Initiative 7.3.2.3.

(c) State the date that PacifiCorp completed data collection and data analysis for Initiative 7.3.2.3.

(d) Explain whether Initiative 7.3.2.3 successfully evaluated the usefulness of continuous monitoring technology for wildfire detection and reliability.

(e) Provide all Documents that show the results of Initiative 7.3.2.3 and state all relevant page number(s).

Response to CPUC SED Data Request 3.14

(a) The original scope for Initiative 7.3.2.3 (Continuous Monitoring Sensors pilot) was to have four devices installed: two at the Weed substation and two at the Lassen substation, as stated on page 127 of PacifiCorp's 2021 Wildfire Mitigation Plan (WMP). The scope was reduced to two as the intended devices for Lassen were for a newly built substation and ongoing construction delayed the installation of those two devices to 2022. The target of 22 was a typographical error.

(b) Two devices at Weed substation – October 2, 2021. Two devices at Lassen substation – December 28, 2022.

(c) Data collection started on October 2, 2021 for the Weed substation devices, and March 3, 2023 for the Lassen substation devices. Devices continued communicating until the end of the pilot on December 31, 2024. Data analysis did not occur because reports did not provide data in a way to isolate where issues that needed resolution could be identified on the circuits.

(d) Please refer to the Company's response to subpart (c) above.

(e) Due to not being able to isolate the location of issues, no useful data analysis could be prepared and the Company does not have any relevant documentation to show the results of this initiative.

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