PACIFIC POWER
A DIVISION OF PACIFICORP

825 NE Multnomah Street, Suite 2000
Portland, Oregon 97232

December 31, 2025

VIA ELECTRONIC FILING

Public Utility Commission of Oregon
Attn: Filing Center
201 High Street SE, Suite 100
Salem, OR 97301-3398

Re: UM 2207(3)—PacifiCorp's 2026-2028 Wildfire Mitigation Plan

PacifiCorp d/b/a Pacific Power (PacifiCorp) submits for filing with the Public Utility Commission of Oregon its 2026-2028 Wildfire Mitigation Plan (WMP).

Due to its large size, the RSE Workbook was provided in Huddle for accessibility.

The 2026-2028 WMP and the WMP Data Templates include confidential information. PacifiCorp is filing both a confidential and redacted version of its 2026-2028 WMP and its WMP Data Template. Confidential information is provided subject to the terms of General Protective Order No. 23-132 in this proceeding.

PacifiCorp respectfully requests that all communications related to this filing be addressed to:

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825 NE Multnomah Street, Suite 2000
Portland, OR 97232
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825 NE Multnomah Street, Suite 2000
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Additionally, PacifiCorp requests that all formal information requests regarding this matter be addressed to:

By email (preferred): datarequest@pacificorp.com

By regular mail: Data Request Response Center
PacifiCorp
825 NE Multnomah St., Suite 2000
Portland, OR 97232

If you have any questions about this filing, please contact Amira Thompson, State Regulatory Affairs Manager, at (503) 260-4420.

Sincerely,

Robert Meredith
Director, Regulation

Enclosures

CERTIFICATE OF SERVICE

I certify that a true and correct copy of **PacifiCorp's 2026-2028 Wildfire Mitigation Plan – Confidential Version** was served on the parties listed below that have signed the protective order in this proceeding via electronic mail in compliance with OAR 860-001-0180.

Service List
UM 2207

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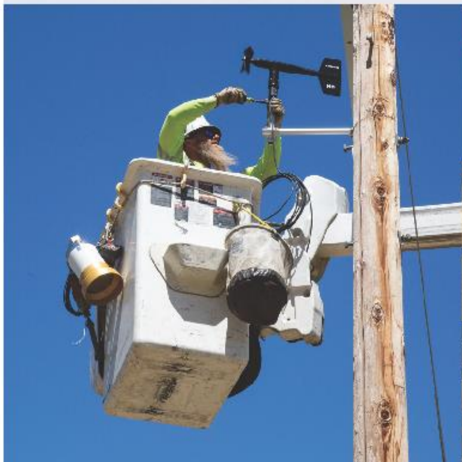
Dated this 31st day of December, 2025.

Carrie Meyer

Carrie Meyer
Manager, Discovery & Regulatory Operations



2026 - 2028

PacifiCorp Oregon Wildfire Mitigation Plan

Docket Name: 2026-2028 Electrical Corporation Wildfire Mitigation Plans

Docket Number: UM 2207

Date: December 31, 2025

PACIFICORP.

On the cover: Examples of PacifiCorp's system hardening, resiliency and situational awareness activities that help the Company address the growing threat of wildfire in the West.

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Abbreviations

Abbreviation	Definition
ADS	Atmospheric Data Solutions
AAC	Automatic Adjustment Clause
AFN	Access and Functional Needs
AI	Artificial Intelligence
ANSI	American National Standards Institute
ASL	American Sign Language
BCR	Benefit-Cost Ratio
BHE	Berkshire Hathaway Energy
BPA	Bonneville Power Administration
CBO	Community-based Organization
CFCI	Communicating Fault Current Indicators
CFSR	Climate Forecast System Reanalysis
CMI	Customer Minutes Impacted
COMTRADE	Common Format for Transient Data Exchange
CoRE	Consequence of risk event
CR	Conditional Risk
CRC	Community Resource Center
DMS	Distribution Management System
DOE	Department of Energy
ECC	Emergency Coordination Center
EDDI	Evaporative Demand Drought Index
EEI	Edison Electric Institute
EFD	Early Fault Detection
EFR	Elevated Fire Risk
EMS	Energy Management System
EPRI	Electric Power Research Institute
ER	Expected Risk
ERC	Energy Release Component
ERR	Energy Release Risk
ESA	European Space Agency
ESF	Emergency Support Function
ESS	Enhanced Safety Settings
FAC	Facility Compliance
FPI	Fire Potential Index
FPI	Facility Point Inspection
GACC	Geographic Area Coordination Center
GFS	Global Forecast System

Abbreviation	Definition
GIS	Geographical Information System
GISMO	Geographic Information Systems Maintenance Organizer
GMTED	Global Multi-resolution Terrain Elevation Data
GPS	Global Positioning System
GRIP	Grid Resilience and Innovation Partnerships
HD	High Definition
HDWI	Hot-Dry-Windy Index
HFRZ	High Fire Risk Zone
HPCC	High Performance Computing Clusters
HWW	High Wind Warning
ICE	Interruption Cost Estimate
IDE	Integrated Development Environment
IEEE	Institute of Electrical and Electronics Engineers
IOU	Investor-owned Utility
IR	Infrared
IRWIN	Integrated Reporting of Wildland-Fire Information
ISA	International Society of Arboriculture
IWRMC	International Wildfire Risk Mitigation Consortium
JIT	Joint Information Team
KPI	Key Performance Indicator
LoRE	Likelihood of risk event
MAVF	Multi Attribute Value Framework
MODIS	Moderate Resolution Imaging Spectroradiometer
MRLC	Multi-Resolution Land Characteristics
MVCD	Minimum Vegetation Clearance Distance
MYNN	Mellor-Yamada-Nakanishi-Niino
NASA	National Aeronautics and Space Administration
NCEP	National Center for Environmental Prediction
NDVI	Normalized Differential Vegetation Index
NERC	North American Electric Reliability Corporation
NESC	National Electrical Safety Code
NFDRS	National Fire Danger Rating System
NGO	Non-governmental Organization
NIFC	National Interagency Fire Center
NIFS	National Incident Feature Services
NIMS	National Incident Management System
NOAA	National Oceanic and Atmospheric Administration
NWS	National Weather Service
O&M	Operations and Maintenance

Abbreviation	Definition
OAR	Oregon Administrative Rule
OCCRI	Oregon Climate Change Research Institute
ODEM	Oregon Department of Emergency Management
ODF	Oregon Department of Forestry
ODOT	Oregon Department of Transportation
OERS	Oregon Emergency Response System Council
OH	Overhead
OHAZ	Oregon Hazards Lab
OPUC	Oregon Public Utility Commission
PAC	PacifiCorp
PBL	Planetary Boundary Layer
PG&E	Pacific Gas & Electrics
PGE	Portland General Electric
PIO	Public Information Officer
POF	Probability of Fault
POI	Probability of Ignition
PSP	Public Safety Partner
PSPS	Public Safety Power Shutoff
PTT	Pole Test and Treat
PVM	PacifiCorp Vegetation Management
QA/QC	Quality Assurance/Quality Control
RAIL	Risk Associated with Ignition Location
RAVE	Risk Associated with Value Exposure
RAWS	Remote Automated Weather Station
RBM	Regional Business Manager
READi	Climate Resilience and Adaptation Initiative
RF	Radio Frequency
RMS	Root Mean Square
RMWG	Risk Modeling Working Group
RSE	Risk-Spend Efficiency
RTG	Real-Time Global
SAP	Systems, Applications, and Products in Data Processing
SCADA	Supervisory Control and Data Acquisition
SCAN	Substation Control Advanced Network
SCE	Southern California Edison
SDG&E	San Diego Gas & Electric
SME	Subject Matter Expert
SMS	Short Message Service
SOM	Self-Organizing Map

Abbreviation	Definition
SOP	Standard Operating Procedure
SPoRT	Short-term Prediction Research and Transition
T&D	Transmission and Distribution
TTX	Tabletop Exercise
UG	Underground
US	United States
USDA	United States Department of Agriculture
USFS	United States Forest Service
USGS	United States Geological Survey
VA	Visual Assurance
VIIRS	Visible Infrared Imaging Radiometer Suite
VPD	Vapor Pressure Deficit
WECC	Western Electricity Coordinating Council
WEI	Western Energy Institute
WFA-E	Wildfire Analyst-Enterprise
WG	Working Group
WIC	Wildfire Intelligence Center
WMP	Wildfire Mitigation Plan
WRF	Weather Research and Forecasting
WRGC	Wildfire Risk Governance Committee
WSAB	Wildfire Safety Advisory Board
WSGC	Wildfire Scope Governance Committee
WSGC	Wildfire Scope Governance Committee
WUI	Wildland-Urban Interface
WUTC	Washington Utilities and Transportation Commission
ZOP	Zone of Protection

1. Executive Summary

Wildfires and extreme weather pose growing threats to the health, safety, and livelihoods of everyone in the West, including PacifiCorp's Oregon customers. The Oregon Climate Change Research Institute's (OCCRI) Seventh Oregon Climate Assessment describes growing risks associated with more frequent and severe droughts in Oregon, longer fire seasons, and higher anticipated health and economic consequences from extreme weather and catastrophic wildfires.[1] Further, wildfires can

[1] See Oregon Climate Change Research Institute: oregon-climate-assessment.pdf.

damage critical utility infrastructure and the financial health of the Company, jeopardizing PacifiCorp's ability to deliver safe, reliable power to the communities we serve.[2]

PacifiCorp's 2026–2028 Base Wildfire Mitigation Plan (WMP) outlines the Company's strategy to systematically address the growing risk of utility-related wildfires using both preventive and responsive strategies. The 2026–2028 WMP is designed to align with the requirements set forth in Oregon Administrative Rules Chapter 860 Division 300 Section 20 (OAR 860-300-0020) and be responsive to regulatory and stakeholder feedback.

The primary objective of the WMP is to reduce the likelihood and impact of wildfires associated with utility infrastructure, with a focus on safeguarding communities. As the largest private grid operator in the West, PacifiCorp draws upon industry standard approaches adapted to the Company's Oregon operations and territory-specific risk-based modeling and expert review. PacifiCorp identifies strategies that balance risk mitigation, service reliability, resiliency, and cost.

The WMP Overview summarizes the WMP's key components, strategic objectives, and continuous improvement framework. PacifiCorp's WMP includes five key pillars:

1. Long-term risk modeling
2. System strengthening and resilience
3. Situational awareness
4. Operational practices
5. Engagement

These five pillars support multiple coordinated and complementary frameworks of wildfire risk reduction, as shown below in Figure 1-1.

[2] See PNNL Presentation: Wildfire Risk Review of Utility Industry Trends_PNNL_July 2025.pdf.

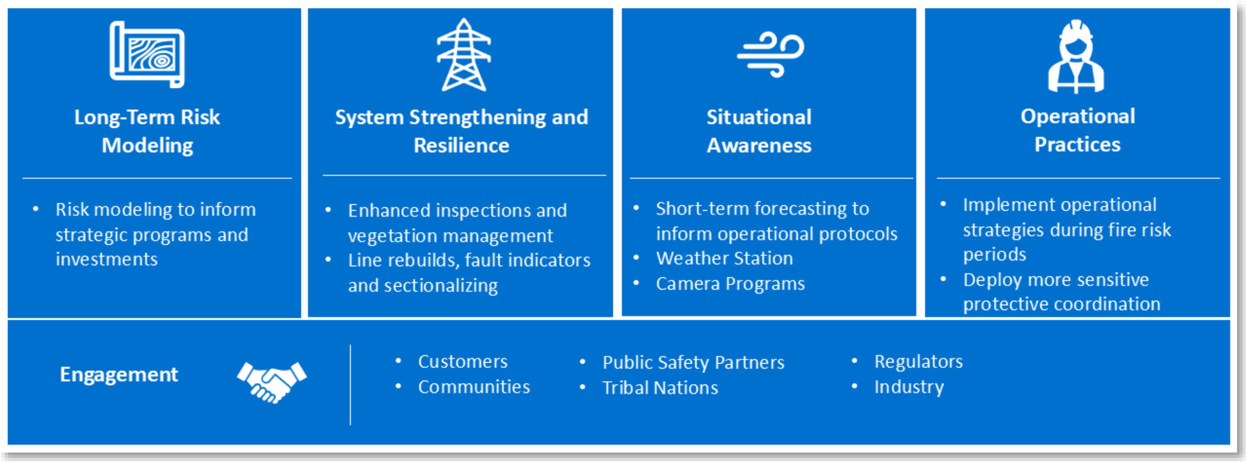


Figure 1-1: PacifiCorp's Pillars of Wildfire Risk Mitigation

Long-term risk modeling identifies key areas, including high fire risk zones (HFRZ), and utility facilities that pose the greatest risk of causing wildfire. The Company's risk modeling has growing capacity to inform targeted mitigation strategies that are responsive to different scenarios and magnitudes of risk.

System strengthening and resilience is informed by long-term risk modeling, which may include targeted investments such as replacing bare conductor with insulated covered conductor, undergrounding high-risk lines, or installing system automation devices designed to enhance fault detection and rapid responses to potential ignitions or outages. Intelligent locating of hardware, such as communicating fault current indicators (CFCIs) to detect precise locations of faults and reclosers to segment off and potentially de-energize portions of a circuit, allows the Company to more accurately sense faults and potential ignitions, and isolate responsive measures to tighter portions of its system. These capabilities are important to enabling key mitigation strategies while minimizing service disruptions. System strengthening and resilience investments are important to constructing, maintaining, and operating a safe, reliable, and adaptive system that can handle current and future risks, in addition to producing vital data to guide continuous improvement of the WMP.

System strengthening and resilience also includes performing enhanced vegetation management and asset inspections in areas identified as having elevated wildfire risk.

Situational awareness entails the use of augmented weather instruments, advanced simulations, and real-time camera surveillance to assess daily ignition and wildfire risk, which informs operational practices.

Responsive **operational practices** include changing employee work practices and/or adjusting the enhanced safety settings (ESS) of grid equipment to address higher anticipated near-term ignition risks, or even in extreme cases, implementing a public safety power shutoff (PSPS). Other, longer-term changes to operational practices include stringent facility inspections and rigorous vegetation management protocols for high-risk areas identified through long-term risk modeling.

Underlying each of these components is proactive **engagement** with customers, public safety partners, Tribal nations, the Oregon Public Utility Commission (OPUC), advocacy and community-based organizations, and utilities across the United States and Canada. This engagement can come in multiple forms: webinars and in-person meetings presenting PacifiCorp's WMP, bill messaging for customers, advertising in local media, or preparedness exercises with safety partners.

For the 2026–2028 WMP cycle, PacifiCorp's strategic objectives include building upon previous successes, addressing identified opportunities for improvement, and reinforcing strategies based on new data, lessons learned from the 2024–2025 WMP cycle, and maturing risk modeling.

Figure 1-2 below outlines achievements from the 2025 WMP through the third quarter and the Company's targets for ongoing development and improvements for the 2026–2028 WMP.

Figure 1-2: PacifiCorp WMP Accomplishments and Targets

While PacifiCorp's 2026–2028 WMP largely builds upon the foundational mitigation strategies of its 2024–2025 WMP, the 2026–2028 WMP highlights key advancements in program maturity.

The application of the Company's evolving risk-based modeling plays a growing role in PacifiCorp's risk mitigation strategy. The modeling identifies high fire risk zones (HFRZ), which have the highest combination of risk and consequence from a wildfire associated with utility infrastructure. This methodology informs where to prioritize mitigation efforts such as system hardening, enhanced equipment inspections and repair protocols, and vegetation management.

PacifiCorp examines the suite of options available to mitigate risks and identifies the most cost-effective solutions that are compatible with utility duties and operations in order to achieve a beneficial outcome for customers. As the Company's modeling continues to advance, mitigation strategies will become more targeted and informed by growing datasets, experience, best practices, and layering in modern techniques and technologies. Building up this precision and efficiency is essential to providing the best outcome for at-risk communities.

As new risks, technologies, and insights from risk-based modeling and industry best practices evolve, PacifiCorp is continuously evaluating opportunities to improve program delivery. The maturation of these programs is essential to balance evolving wildfire risks in Oregon while seeking to avoid adverse customer impacts. The WMP is scheduled for comprehensive updates every three years, with the next full review scheduled in 2028 for the 2029–2031 WMP cycle. Regular iteration will ensure that the WMP evolves according to new data, risk mitigation options, and stakeholder insights. Annual updates to the 2026–2028 plan will be submitted as required by OPUC.

2. Overview of the WMP

2.1 Goals and Objectives

The primary goal of PacifiCorp's WMP is to reduce the likelihood and impact of wildfires associated with utility infrastructure, with a focus on safeguarding at-risk communities.

Long-Term Risk Modeling

Goal: PacificCorp combines over 30 years of weather and fire history with advanced simulations to highlight areas of concern. This long-term risk modeling helps the Company understand the potential consequences to the surrounding area should an ignition occur. This view of risk modeling can inform where the areas of the highest fire risk are, which supports program strategy, such as where to focus system hardening, when to expedite facility inspections and corrections, and where to manage vegetation more frequently.

Objectives: Long-term risk modeling continues to be an area of development for PacifiCorp. Over the next three years, the Company will develop a grid hardening portfolio optimization model component to deploy the appropriate strategy and programs to mitigate the risk, as described in Section 5. PacifiCorp will also review the results of a climate change assessment to determine how it may affect long-term risk modeling.

System Resilience and Strengthening

Goal: Apply mitigations that address the long-term risk on a systematic basis, inclusive of grid hardening efforts to reduce the long-term risk of an ignition.

Objectives: Continue the regular programs of equipment inspection and accelerated correction of conditions that may cause an energy release or safety risk and enhanced vegetation management practices in areas of elevated risk as described in Sections 7 and 8.

In system hardening, continued work to build a resilient system through the line hardening program remains a top priority. PacifiCorp will continue to install fault detection, protection, and communication devices to make the system more sensitive to faults to reduce the risk of an ignition, sectionalize the system to create a smaller customer impact when a fault does occur, and quickly identify the area where the fault occurred to support timely restoration and mitigate customer impacts. System resiliency is discussed in greater detail in Sections 6.

Situational Awareness

Goal: Provide a daily risk forecast, supported by short-term risk modeling that examines wildfire risk and consequences over a five-day period. This regular analysis assesses weather and fuel conditions and evaluates the potential for wildfire. This near-term view informs PacificCorp's responsive operational practices.

Objectives: Continue developing short-term models and tools to provide detailed, timely forecasts with a high degree of confidence to support operational decision-making, such as adjusting work practices, enabling ESS as discussed in Section 10.2.1 or, as a last resort, implementing a PSPS as discussed in Section 11.5.1. Situational awareness initiatives and activities are discussed in Section 8.5.1.

Operational Practices

Goal: As fire risk escalates, so does the Company's response. These responses can range from deferring non-essential work in windy or other high-risk conditions to implementing ESS or PSPS.

Objectives: Apply risk-based operational practices to mitigate the risk of an ignition based on the forecasted conditions. These risk-based practices may include adjusting work practices as described in Section 10.2.3, adjusting ESS as discussed in Section 10.2.1 or, as a last resort, implementing a PSPS as discussed in Section 11.5.1. During the 2026–2028 WMP cycle, PacifiCorp will continue to refine ESS and PSPS operational practices, recognizing the disruptive effects these may have on customers. PacifiCorp continues to evaluate opportunities to increase public awareness of the impacts of its operational practices to better prepare communities for these unanticipated outages.

Engagement

Goal: Ensure that PacifiCorp's stakeholders—including customers, public safety partners, community-based organizations, Tribal nations, and OPUC—are informed of PacifiCorp's WMP and actions taken to reduce the risk of wildfire. By proactively engaging in advance with stakeholders throughout our service territory, communities are better equipped to manage the impacts of service interruptions from ESS, emergency de-energizations, or PSPS. Sharing these operational practices via webinars, workshops, functional needs surveys, and other informal communications with community leaders helps ensure resources are directed efficiently to vulnerable jurisdictions.

Objectives: Continue outreach to public safety partners, customers, communities, and Tribal nations in PacifiCorp's service area regarding wildfire mitigation and monitor program reach and effectiveness to relevant stakeholders. The central objective of this outreach is to identify new opportunities to educate stakeholders on the operational practices that the Company may take to reduce the risk of ignition and how they can stay informed and prepared. This is discussed in greater detail in Section 0.

2.2 Prior and Projected Expenditures

Table OPUC 2-1 below summarizes PacifiCorp's wildfire mitigation expenditures in each of the initiative categories. The "Prior WMP Spend" covers expenditures from 2022 through the third quarter of 2025. The costs of specific initiatives are discussed in subsequent sections.

Table OPUC 2-1: 2025 WMP Expenditure and 2026–2028 Projected WMP Expenditures in Thousands

Initiative Category	Prior WMP Spend (as of Q3 2025)		2026 Forecast		2027 Forecast		2028 Forecast		Total	
	Capital ($1,000)	O&M ($1,000)	Capital ($1,000)	O&M ($1,000)	Capital ($1,000)	O&M ($1,000)	Capital ($1,000)	O&M ($1,000)	Capital ($1,000)	O&M ($1,000)
Community Outreach and Public Awareness (COPA)	$ 2,021	$ 1,997	$ 0	$ 934	$ 0	$ 934	$ 0	$ 934	**$ 2,021**	**$ 4,798**
PSPS/Emergency Preparedness (PSPS)	$ 2,377	$ 4,735	$ 1,140	$ 3,820	$ 0	$ 3,646	$ 0	$ 3,747	**$ 3,517**	**$ 15,948**
Grid Design and System Hardening (GDSH)	$ 532,728	$ 2,405	$ 260,275	$ 1,365	$ 252,125	$ 1,520	$ 252,125	$ 1,567	**$ 1,297,253**	**$ 6,856**
Grid Operations and Protocols (GOP)	$ 4,267	$ 5,109	$ 18	$ 18	$ 18	$ 18	$ 18	$ 18	**$ 4,321**	**$ 5,163**
Industry Engagement (IE)	$ 0	$ 175	$ 0	$ 65	$ 0	$ 68	$ 0	$ 69	**$ 0**	**$ 377**
Inspect/Correct (IC)	$ 0	$ 7,444	$ 0	$ 7,574	$ 0	$ 7,410	$ 0	$ 7,771	**$ 0**	**$ 30,199**
Overview of the Service Territory (OST)	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0	**$ 0**	**$ 0**
Risk Methodology and Assessment (RMA)	$ 1,150	$ 3,205	$ 0	$ 874	$ 0	$ 894	$ 0	$ 915	**$ 1,150**	**$ 5,888**
Situational Awareness and Forecasting (SAF)	$ 5,130	$ 7,578	$ 428	$ 2,004	$ 200	$ 2,222	$ 14,703	$ 2,321	**$ 20,461**	**$ 14,125**
Vegetation Management (VM)	$ 0	$ 72,628	$ 0	$ 9,227	$ 0	$ 9,612	$ 0	$ 9,905	**$ 0**	**$ 101,372**
Wildfire Mitigation Strategy Development (WMSD)	$ 274	$ 3,025	$ 190	$ 966	$ 190	$ 985	$ 10,349	$ 787	**$ 11,003**	**$ 5,763**
Other	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0	**$ 0**	**$ 0**
Total	**$ 547,947**	**$ 108,301**	**$ 262,051**	**$ 26,845**	**$ 252,533**	**$ 27,308**	**$ 277,195**	**$ 28,034**	**$1 ,339,726**	**$ 190,488**

2.2.1 WMP Grants

Table OPUC 2-2 lists the grants that PacifiCorp has been awarded as of December 31, 2025.

Table OPUC 2-2: WMP Grant Overview

Grant Name	WMP Project/ Initiative	Awarding Agency	Awarded Amount ($1,000)	Timeline	Status	Comment	Report Reference Section
PacifiCorp's Equity-aware Enhancement of Grid Resiliency (Project PEER)	OR-GH-01: Covered Conductor Installation (Tree Wire) OR-GH-02: Distribution Pole Replacement	Grid Resilience and Innovation Partnerships (GRIP) Program – United States Department of Energy (DOE)	$ 1,000	Implementation commenced in October 2024; scheduled for completion by September 2028	In Progress	Project PEER is aimed at reducing the impact of extreme weather events, particularly wildfires, on the electric grid that serves rural communities and Tribal lands. The project focuses on deploying innovative asset hardening solutions using critical fire-resistant and fire prevention technologies to effectively reduce or eliminate ignition risks caused by overhead utility assets in the area and to significantly improve electrical system resiliency.	
Resiliency Enhancement for Fire Mitigation and Operational Risk Management (Project REFORM)	OR-SA-08: Installation of SCAN OR-SA-11: Situational Awareness Modeling and Tools	GRIP Program – DOE	$ 50,000	Implementation commenced in October 2024; scheduled for completion by September 2029	In Progress	Project REFORM is a comprehensive initiative aimed at reducing the occurrence and severity of wildfire across rural and urban areas in the Western United States. This includes advanced weather forecasting models, wildfire detection network with AI-enabled cameras, and innovative smart grid technologies such as microprocessor control relays and substation controls. The project aims to reduce the likelihood and consequences of wildfires through advanced detection and prevention technologies.	
Oregon 40101(d)	OR-GH-01: Covered Conductor Installation (Tree Wire) OR-GH-02: Distribution Pole Replacement	Oregon Department of Energy (ODOE)	$ 4,100	Awaiting final contract closure; implementation scheduled for 2025–2030	Awaiting final contract closure	This project involves reconductoring 10 miles of distribution lines, installing 65 fire-resistant poles, and inspecting 200 poles in rural communities northwest of Grants Pass. Resilience objectives are twofold: minimize the ignition risk and ensure a more resilient system with fewer outages. Outage frequency and duration are expected to be significantly reduced as a result of the project.	
Total Under Contract			$ 51,000				
Grant Total			**$ 55,100**				

All the grants require PacifiCorp to first pay project costs and then demonstrate that the costs match commitments and appropriate milestones are met. All project costs are allocated into PacifiCorp's internal accounting system based on the project-specific work breakdown structure and task-related work orders, in compliance with both Company and federally approved budgets for the project scope. Additionally, the costs are aligned with the federally-approved breakdown of project costs between PacifiCorp's cost share and grant funds. These costs are then reviewed by cost type to determine eligibility for federal reimbursement. Once this review is completed, a formal reimbursement request is submitted to the funding agency. Following funding agency approvals and receipt of the reimbursement, the grant funds are applied to project costs.

Subsequent impacts of these grants on customer rates are through the annual filing of the Oregon WMP automatic adjustment clause (AAC) mechanisms. Each year, costs are trued up to actual incurred expenses in the reporting fiscal year most recently concluded. Annual WMP AAC updates also reflect true-ups of capital investment levels to most recently available actual in-service balances. Any grant received that reduces expenses or net capital in-service balances will be reflected in the true-up calculation of costs in the WMP AAC in the next annual filing for the reporting period covered.[3] Customers will see the impact of the grants on customer rates after OPUC approval of the AAC as a net impact on the requested change.

2.3 WMP Program Delivery

Table OPUC 2-3 below presents PacifiCorp's forecast for asset unit delivery. PacifiCorp is able to provide planned and actuals from 2021 through the third quarter of 2025 but does not have information on 2020 planned and actual equipment upgrades. PacifiCorp did not have specific targets for tree wire and spacer cable between 2020 and 2024, and the tree wire row reflects the total planned and actual upgrades for both equipment types.

[3] Please see Advice 25-0122 Schedule 190 Wildfire Mitigation Plan Cost Recovery Adjustment, filed July 1, 2025.

Table OPUC 2-3: Asset Unit Delivery

Mitigation Asset	2020-2023 Planned	2020-2023 Actual	2024 Planned	2024 Actual	2025 Planned	2025 Actual	2026 Planned	2026 Actual	2027 Planned	2027 Actual	2028 Planned	2028 Actual
Covered Conductor-Tree Wire (line miles)	159	86	125	87	150	148	170		165		165	
Covered Conductor-Spacer Cable (line miles)	0	0	0	0	10	0	0		0		0	
Distribution Pole Replacements	1,784	1,255	2,500	1,230	3,850	3,700	3,440		2,400		2,400	
Underground Distribution	0	0	0	0	0	0	2		0		0	
Distribution Relays	67	43	35	7	23	12	31		35		77	
Reclosers	102	119	36	41	38	39	24		25		0	
Transmission (line miles)	0	0	0	10	10	0.4	0.4		15		15	
Transmission Poles	47	0	50	4	180	5	160		240		240	
Transmission Relays	26	11	10	2	6	8	0		2		0	
Communicating Fault Current Indicators	1,579	1,504	300	341	745	733	0		0		0	
Non-Expulsion Fuses	14,133	8,292	8,967	9,063	8,000	5,298	8,000		0		0	
Cameras	0	7	5	5	0	0	3		0		0	
Weather Stations	155	137	25	25	12	8	10		10		0	

2.3.1 WMP Program Delivery Target Updates

As of the third quarter of 2025, PacifiCorp is on track to meet its targets for 2025. Please see the specific sections of the WMP for detailed results.

3. Overview of the Service Territory

3.1 Service Territory

In Oregon, PacifiCorp provides electricity to 636,106 customers, via 17,241 line miles of overhead transmission and distribution lines and 5,809 underground line miles across 21,328 square miles of territory, with approximately 16% of the service territory in an HFRZ. Table OPUC 3-1 below summarizes the Company's service territory components.

Table OPUC 3-1: Service Territory Components

Characteristic	HFRZ	Non-HFRZ	Total
Area Served (sq. mi.)	2,962	18,366	21,328
Number of Customers	79,012	557,391	636,106
Overhead Transmission Circuit Miles	641	2,465	3,106
Overhead Distribution Circuit Miles	3,019	11,116	14,135
Underground Transmission Circuit Miles	0	0.2	0.2
Underground Distribution Circuit Miles	1,293	4,516	5,809
Substations	50	243	293
Poles/Structures	81,265	333,406	414,671

Figure 3-1 below presents PacifiCorp's service territory overlaid with population density. Appendix D provides maps of PacifiCorp's HFRZs.

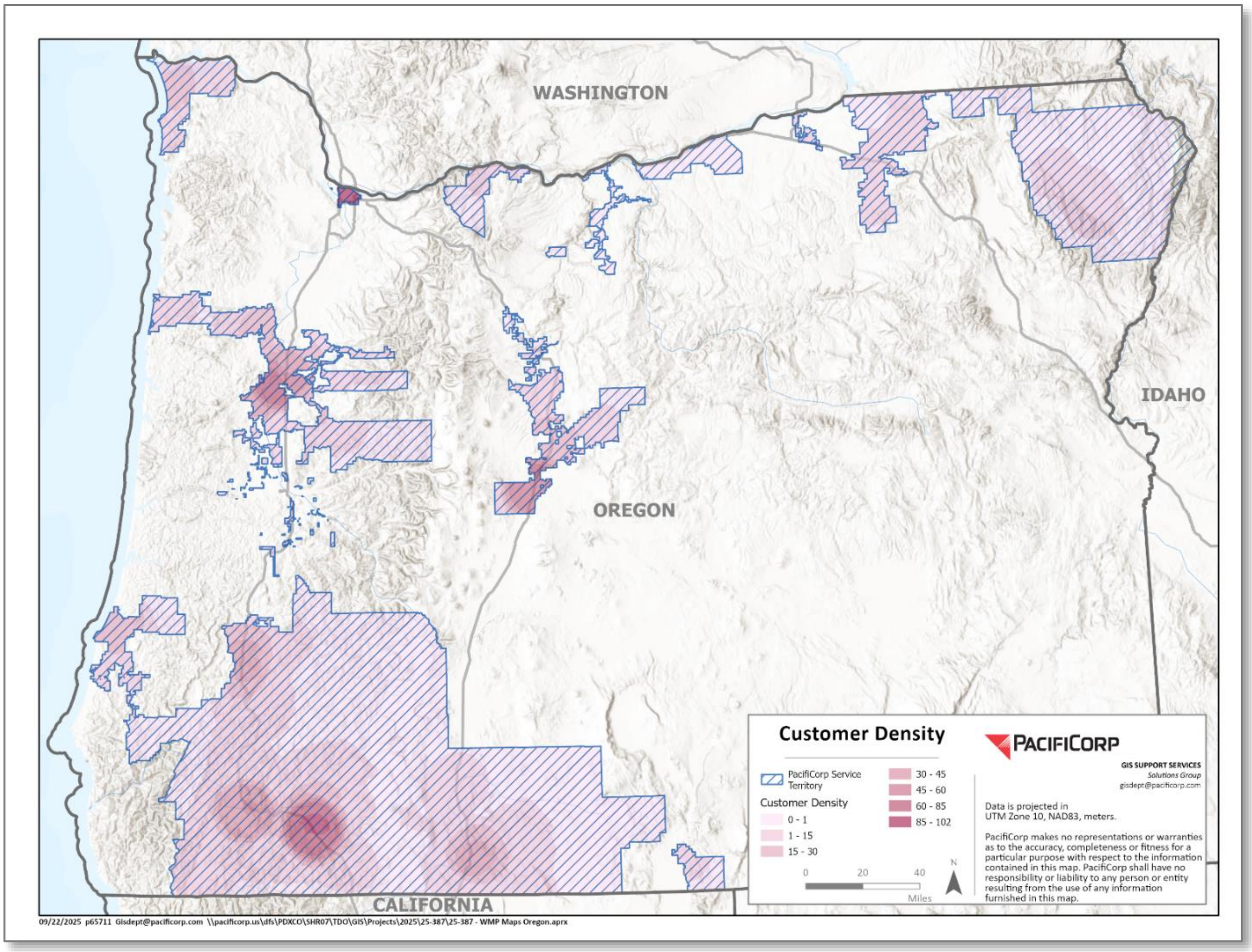


Figure 3-1: Service Territory and Customer Distribution

Geography

PacifiCorp's electrical infrastructure extends across remote regions, crossing steep and complex terrain, often with limited points of access. These diverse geographic settings present a portfolio of fire risks, which the Company must analyze, communicate, and prioritize. This portfolio includes a host of variables, including different fuels, topography, atmospheric conditions, weather patterns, and fire potential and consequences. The importance of these features is discussed in greater detail under Section 4.

Customer Distribution

PacifiCorp averages 29 customers per square mile in its Oregon service territory. Some areas within PacifiCorp's territory are relatively population dense, such as Portland, Bend, and Medford. PacifiCorp's Oregon territory consists primarily of rural, agricultural communities, which pose a different set of considerations. Overall, PacifiCorp's number of customers per circuit mile is low, which means the Company has considerable infrastructure to monitor and maintain relative to the number of customers in the area.

Customer Awareness of Wildfire Risk

PacifiCorp conducts annual surveys to evaluate customer awareness and understanding of wildfire preparedness messaging and PSPS protocols. The survey aims to measure recall of key messages, assess communication effectiveness, identify key communications channels, and identify actions customers are taking to reduce wildfire risk. Between September 30 and October 13, 2025, a total of 2,606 surveys were completed, including responses from 86 critical customers. Surveys were offered online and by phone in English and Spanish, and the questionnaire was refined to include access and functional needs (AFN) self-identification, emergency de-energization questions, and updated communication topics.

These findings reveal continued progress in wildfire safety awareness. Nearly 69% of customers reported awareness of wildfire safety communications, up from 57% in April 2025, with the highest awareness in Central Oregon, Hood River, and Southern Oregon. The Company website remains the most trusted source of information, followed by email and television news. While 47% of customers know they can contact PacifiCorp for wildfire information, only 4% have done so. Awareness of PSPS protocols also showed improvement, with 62% stating they understood that power may be shut off during high-risk conditions, compared with 53% earlier in the year. Awareness of potential de-energization actions is high at 78%. Recommendations based on the survey results can be found in Section 13.

3.2 Electrical Infrastructure

Table OPUC 3-2 below presents PacifiCorp's Oregon electrical infrastructure.

Table OPUC 3-2: PacifiCorp's Oregon Service Territory Electrical Infrastructure

Asset	Overhead Circuit Miles	Overhead Poles/ Structures	Underground Circuit Miles	Total Circuit Miles	% Overhead Circuit Miles
2.40 kV Distribution	3.9	105.0	0.1	4.0	98%
4.16 kV Distribution	84.4	2,395.0	27.0	111.4	76%
7.21 kV Distribution	0.8	21.0	1.4	2.3	36%
11.70 kV Distribution	9.8	435.0	62.9	72.7	13%
12.00 kV Distribution	2,421.5	51,342.0	484.5	2,906.0	83%
12.47 kV Distribution	6,422.2	149,836.0	3,522.6	9,944.9	65%
20.78 kV Distribution	5,057.1	111,956.0	1,678.1	6,735.2	75%
34.50 kV Distribution	133.6	2,186.0	19.4	153.0	87%
0 kV Transmission	11.2	437.0	0.0	11.2	100%
57 kV Transmission	20.3	307.0	0.0	20.3	100%
69 kV Transmission	923.7	15,526.0	0.0	923.7	100%
115 kV Transmission	1,004.9	11,482.0	0.2	1,005.1	100%
230 kV Transmission	608.0	4,614.0	0.0	608.0	100%
500 kV Transmission	517.3	2,305.0	0.0	517.3	100%
Total Distribution	**14,133.3**	**318,276.0**	**5,796.1**	**19,929.4**	**71%**
Total Transmission	**3,085.4**	**34,671.0**	**0.2**	**3,085.6**	**100%**

3.3 Wildfire Environment

Oregon and the Pacific Northwest are seeing an increasingly complex and evolving wildfire environment, with many of the state's largest fires having occurred in recent years. Warmer temperatures, prolonged drought conditions, and increasing fuel loads in wildlands have driven a shift toward larger, more intense, and more frequent fires. These variables present growing risks to communities, the natural environment, and public health. This also highlights the need for adaptive wildfire mitigation strategies, effective vegetation management practices, and collaborative efforts to develop and implement measures that effectively mitigate risks and ensure public safety.

In the past 10 years, wildfires such as the Bootleg, Chetco Bar, Klondike, and Labor Day Fires of 2020 have signaled a significant change in the environmental conditions of wildlands adjacent to PacifiCorp infrastructure. Figure 3-2 shows the number of fires and acres burned from wildland fires in Oregon from 2015 through 2024.[4]

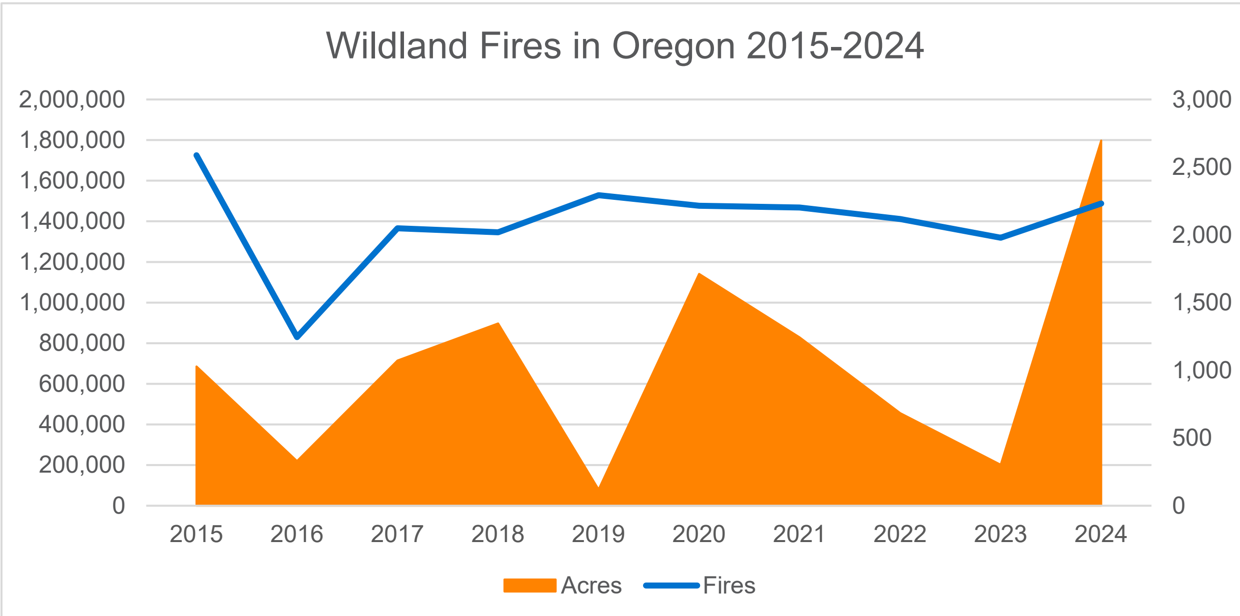


Figure 3-2: Oregon Wildland Fires 2015–2024

Fire history and fire activity are inputs to PacifiCorp's risk modeling. The conditions under which a fire starts and how a fire behaves due to the weather, fuels, and terrain all inform the risk modeling that supports identification of baseline risk described in Section 4. Situational awareness tools described in Sections 9.2.1 and 9.2.2 also use fire history to understand the risk of wildfire and what may happen should there be an ignition.

[4] National Interagency Fire Center (NIFC): https://www.nifc.gov/fire-information/statistics. Sourced October 24, 2025.

4. Risk Methodology and Assessment

4.1 Overview

PacifiCorp's long-term risk model, which examines the long-term wildfire risk associated with utility infrastructure and the risk reduction associated with select system hardening mitigations, continues to evolve. Furthermore, the Company's long-term risk model now feeds into a risk-spend efficiency (RSE) component that is used in the Company's mitigation selection process. In this section, PacifiCorp describes its current long-term risk and RSE model framework, the results of this modeling, and future model improvement plans.

4.1.1 Purpose

The purpose of PacifiCorp's long-term risk and RSE modeling is to inform targeted wildfire mitigation strategies and help estimate the value of wildfire mitigation work. Currently, PacifiCorp's risk and RSE modeling produces three key wildfire mitigation strategy development tools:

1. Delineation of an HFRZ
2. A ranking of circuit segments according to wildfire risk
3. Monetized RSE analyses of mitigation options for the circuit segments

The Company discusses how it uses modeling to inform targeted mitigation strategies in Section 5 and throughout the WMP. Generally, the HFRZ is used to identify where the Company applies enhanced asset inspection and vegetation management protocols, which are discussed in Sections 7 and 8, and where to prioritize dispersed system hardening work, such as installing ESS devices and fault indicators as discussed in Section 6. The ranking of circuit segments according to wildfire risk is used in conjunction with the HFRZ to prioritize circuits for system hardening projects, such as line rebuilds. The monetized RSE analyses are also used for line rebuild strategy development as an assessment of which line rebuild option may be most cost-effective. Using these tools enables the

Company to target mitigations to where they will be most impactful considering risk buy-down per dollar spent.

4.2 Framework and Results for PacifiCorp's Risk and RSE Model

4.2.1 HFRZ Analysis

The HFRZ delineates the areas within the Company's service territory and rights-of-way for transmission assets with the highest risk of utility-associated wildfires. PacifiCorp's methodology for delineating the HFRZ has not changed since its 2024 WMP filing. The outputs of Planning Model Version 1 were used to delineate the boundaries of the HFRZ; specifically, locations where the Wind-Driven or Fuel/Terrain-Driven risk score was ≥0.85 were included in the HFRZ. A summary of PacifiCorp's HFRZ methodology can be found in Appendix H. As discussed in Sections 4.7 and 4.8, the current HFRZ methodology will be updated in 2026.

4.2.2 HFRZ Results

Figure 4-1 shows PacifiCorp's HFRZ in its Oregon service territory. Fourteen percent of the Company's service territory and 12% of its customers are in the HFRZ. The majority of the HFRZ is in southern Oregon, with some smaller areas in the Columbia River Gorge and northeastern Oregon. As described in Section 4.2.1, PacifiCorp has made no changes to its HFRZ since 2024. For detailed maps of PacifiCorp's HFRZs in northeast, northwest, and southern Oregon, see Appendix D.

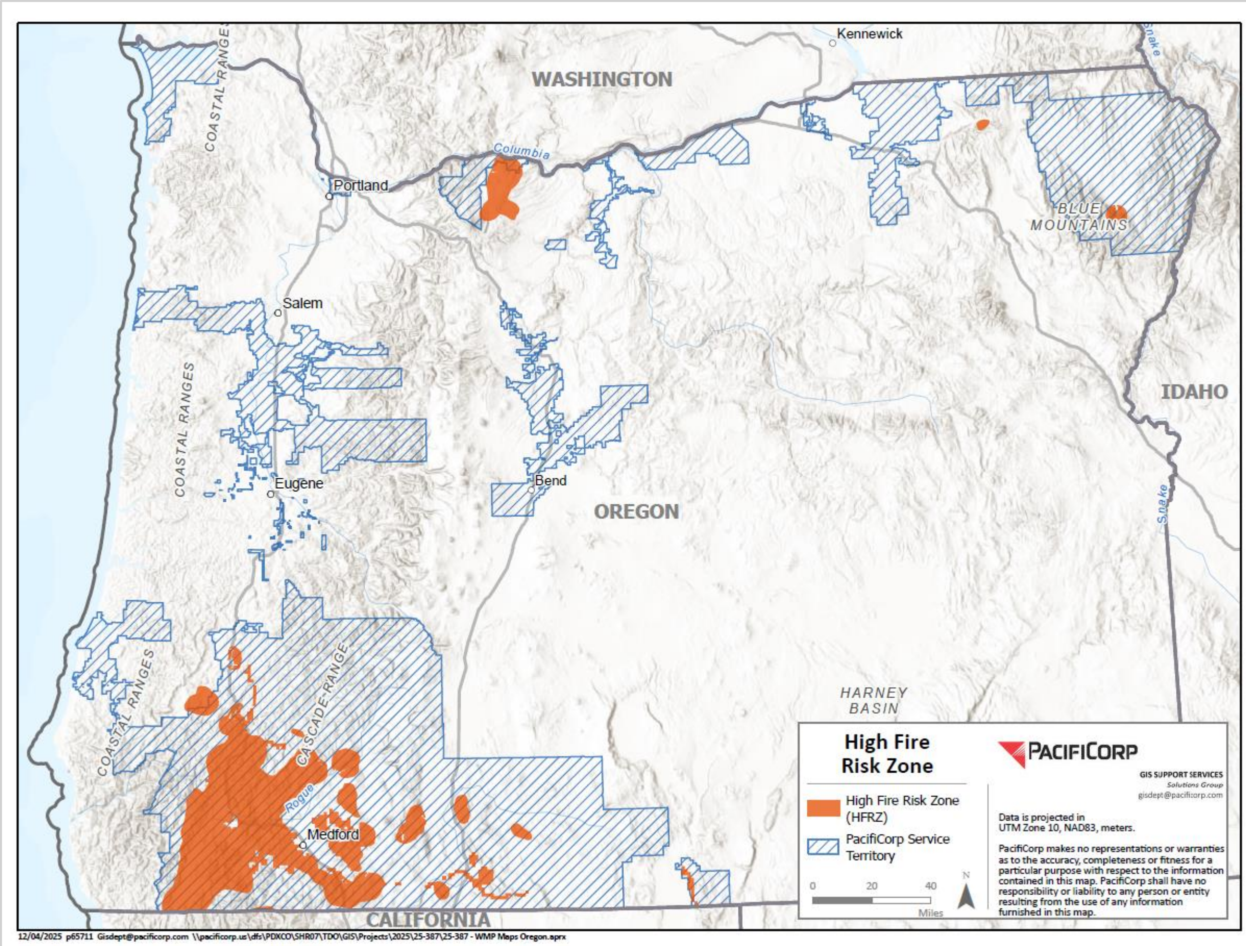


Figure 4-1: PacifiCorp Service Territory in Oregon with High Fire Risk Zones

4.2.3 Circuit Segments Ranking According to Wildfire Risk Analysis

This section describes the methods and execution of PacifiCorp's grid hardening planning model, which is referred to as Planning Model Version 2, and how it informs the Company's circuit segment ranking according to wildfire risk. This updated model was designed to estimate wildfire risk, risk reduction from mitigations, and RSE using monetary units, specifically U.S. dollars. Planning Model Version 2 is also used for the Company's monetized RSE calculations, which are described in Section 4.2.4.

A major overhaul of PacifiCorp's planning model occurred throughout 2025. Based on industry best practices, technical workshops, and joint investor-owned utility (IOU) collaborative meetings, PacifiCorp updated from Planning Model Version 1 to Planning Model Version 2. The current HFRZ is informed by Planning Model Version 1, as detailed in Section 4.2.1 and Appendix H. Planning Model Version 2 incorporates features such as RSE, monetized risk values with calculated risk reduction, a mitigation selection framework, and a portfolio of recommended mitigations. These features were absent from Planning Model Version 1 and represent the next phase of PacifiCorp's risk modeling maturity. Notably, Planning Model Version 2 incorporates a reproducible development environment that integrates software development best practices such as version control and cloud-based data resources. See Appendix I for additional details about the risk model development environment of Planning Model Version 2 and a schematic of the risk assessment component of the new planning model.

PacifiCorp's Planning Model Version 2 divides grid infrastructure into circuit segments according to the momentary zone of protection (ZOP) and measures wildfire, PSPS, and ESS risk in monetary units to identify and recommend wildfire mitigations, considering risk reduction and cost efficiency.

Planning Model Version 2 builds upon the successes and lessons learned from the implementation of Planning Model Version 1. The model evaluates risk reduction based on grid hardening mitigations of undergrounding and covered conductor for distribution assets only.

Input Data

The following sections describe the data transformations, from source to output, in Planning Model Version 2. Planning Model Version 2 leverages data from a variety of internal and external sources. Internal data sources are maintained by various teams within PacifiCorp and include geospatial asset data consisting of circuits, conductors, structures, and other devices. This data is used in the construction of the geographical information system (GIS) network, which is critical for the risk aggregation process described later in this section. Additional GIS boundary data is accessed to outline risk details over PacifiCorp's service area as well as to aggregate risk based on HFRZs. Vendor-contracted data includes the Technosylva FireSight models Risk Associated with Ignition Location

(RAIL) and Risk Associated with Value Exposure (RAVE) outputs, detailed in Appendix H. This data serves as the primary wildfire risk component of Planning Model Version 2 and incorporates PacifiCorp's internal asset and outage data. Additional vendor data includes vegetation strike data as well as data used to monetize risk. These data sources contribute to the individual model subcomponents that are used in the segment-level monetized risk and RSE scores. A complete list of Planning Model Version 2 inputs can be found in Appendix H, specifically Tables H-2 and H-4.

Risk Units

A fundamental change in PacifiCorp's risk methodology is the standardization of risk units. Prior to Planning Model Version 2, risk was viewed on a macro scale at the circuit level and on a miniature scale at the ignition point level. While this multi-tiered view of risk is useful for comparing relative risk between assets at each level, it becomes less effective when expressed in monetary terms. To accurately capture an assumed project size, PacifiCorp adopted circuit segments for its risk units. The Company defines a circuit segment as the circuit miles within a momentary ZOP, generally between devices that typically have reclosing capabilities, such as dynamic protective devices. The resulting circuit segments typically range less than 5 miles in length. See Figure 4-2 for a distribution of circuit segment lengths.

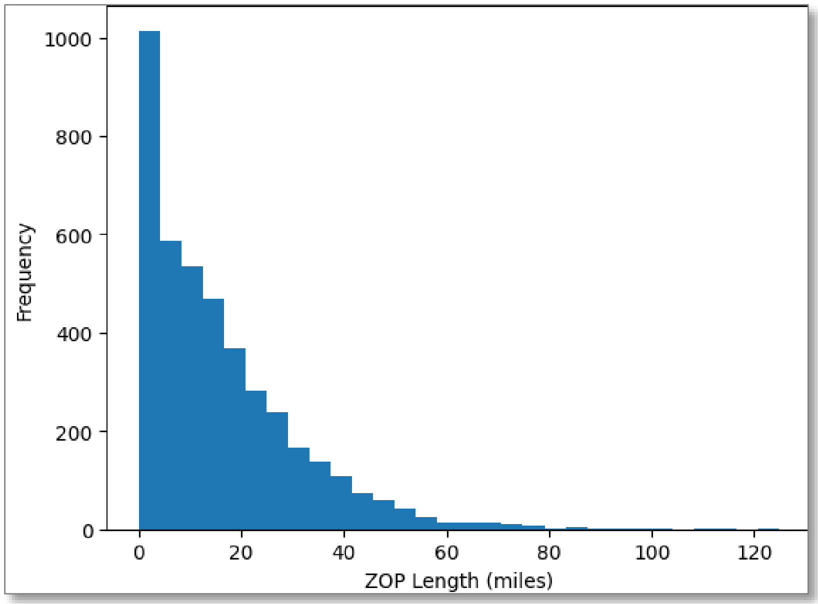


Figure 4-2: Frequency of Circuit Segment Lengths

Figure 4-3 is a map of circuit segments around O'Brien, Oregon.

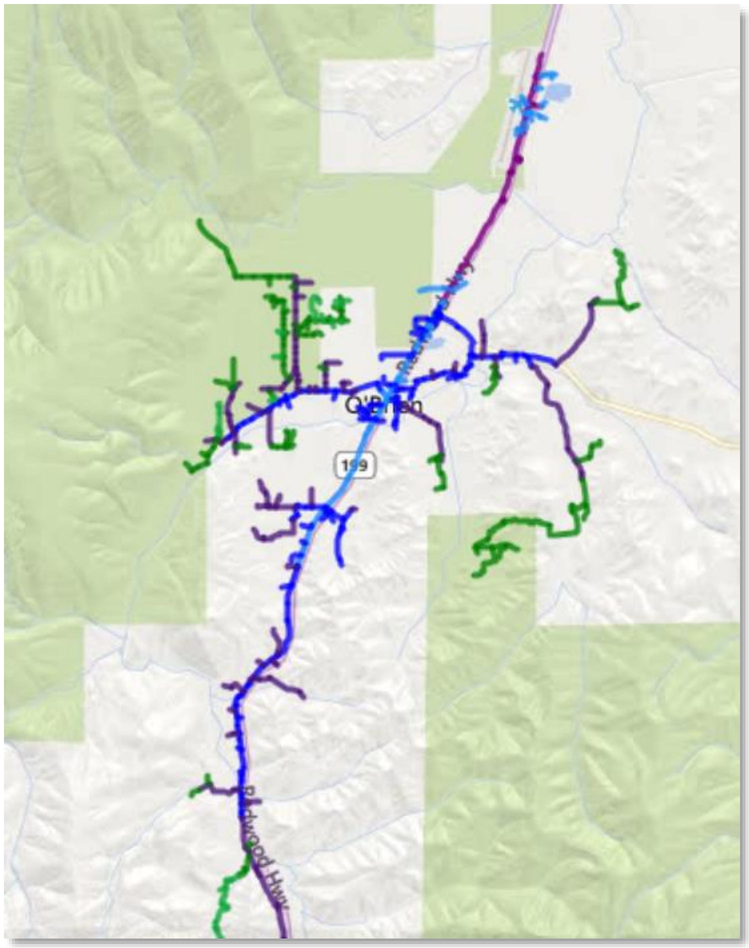


Figure 4-3: Example of Circuit Segments Delineated by Color in and around O'Brien, OR

Overall Risk

PacifiCorp's overall risk computation includes three main risk components: wildfire risk, PSPS risk, and ESS risk. Wildfire risk measures the likelihood and consequence of potential wildfire events. PSPS is an operational mitigation program; however, there is a certain amount of risk associated with PSPS events in the form of reliability and potential safety impacts. Understanding benefits from reducing PSPS impacts is critical to optimizing the intelligence of the grid hardening mitigation decision process. Similar to PSPS, ESS is an operational mitigation that has the potential for both reliability and safety risk associated with its implementation.

To obtain an overall risk score, the monetized effects of each risk component are totaled per circuit segment for a comprehensive understanding of risk based on safety, financial, and reliability impacts. Viewing each risk model's results in units of U.S. dollars is essential to the Company's understanding of the interplay between risk components. Wildfire risk is quantified in the traditional risk modeling method as the product of wildfire consequence of risk event (CoRE) and wildfire likelihood of risk event (LoRE). Wildfire CoRE is obtained via the FireSight wildfire simulation output through conditional risk scores. Conditional risk is used to understand the effects of a wildfire across high fire weather days assuming there is an ignition that starts a wildfire. Wildfire LoRE, or likelihood, is applied to the conditional risk to understand the likelihood of a wildfire occurring per circuit segment on an annual basis. The combination of wildfire LoRE and wildfire CoRE is obtained via the expected risk output, which is informed by the expected risk attributes in the FireSight model. The expected risk attributes of average acres burned and average buildings destroyed are used as the basis to quantify the impact of wildfire per circuit segment.

Wildfire Consequence of Risk Event (CoRE)

The wildfire CoRE subcomponent of wildfire risk is provided in the FireSight model output as conditional risk. Conditional risk is assessed at linear distances of 100 meters or less to obtain a detailed view of impacts from simulated utility-caused wildfires. These 100-meter linear wildfire simulation units will be referred to as simulation units for the remainder of this document. A variety of informative attributes are provided in the FireSight model conditional risk output. These attributes are listed below:

- Conditional acres burned
- Conditional buildings threatened
- Conditional buildings destroyed
- Conditional fire behavior index
- Conditional flame length
- Conditional population impacted

- Conditional rate of spread

Conditional risk is based on the potential impacts of the wildfire simulations per ignition point in the FireSight model.

Wildfire Likelihood of Risk Event (LoRE)

The difference between FireSight's conditional risk and expected risk is that expected risk includes a LoRE metric that measures the likelihood that a risk event will occur at each ignition point. PacifiCorp's wildfire LoRE is based on the expected risk components of probability of fault (POF) and probability of ignition (POI).

Expected Risk

As stated earlier in this section, FireSight's expected risk model is used as the basis for PacifiCorp's risk calculation. Expected risk is a combination of POF, POI, and conditional risk per fire weather day per simulation unit modeled. This calculation combines three variables to identify the relative distribution of wildfire risk across the simulation units. While POF and POI are included in the FireSight output, the intricate way in which POF, POI, and conditional risk are combined per weather day does not lend itself to a simple analysis where the POF × POI × conditional risk will equal the expected risk.

Probability of Fault (POF)

The POF assesses the probability that assets associated with an ignition point will experience a fault. The POF is based on five years of PacifiCorp's outage history. This model uses a hierarchical Bayesian statistical modeling approach, which allows for an inherent measure of uncertainty and variation at different levels of asset aggregation. The POF model is calculated at the circuit level and then evenly distributed across the simulation units within the circuit to provide an approximate assessment of POF per simulation unit.

Probability of Ignition (POI)

The POI model evaluates environmental conditions, such as fuel availability and dryness, to assess the probability of a wildfire resulting from an ignition. The POI model is used in the absence of statistically significant utility-caused wildfire incident data. The source of the POI model includes the ignition component from the National Fire Danger Rating System (NFDRS).

Fire Weather Days

Technosylva's FireSight platform employs a data-driven process for selecting representative fire weather days to support wildfire risk modeling and simulations. Rather than focusing exclusively on the most extreme fire weather events, the methodology captures a balanced distribution of conditions across the medium-to-high risk spectrum. This approach ensures that modeled outcomes reflect the full variability of wildfire risk—not only catastrophic days, but also those moderate or less obvious conditions under which destructive fires have historically occurred.

To characterize fire weather severity, Technosylva combines several meteorological indicators correlated with fire activity and outage potential: vapor pressure deficit (VPD), hot-dry-windy index (HDWI), and maximum wind gusts. For each location, these parameters are converted to percentile ranks and weighted by the length of overhead line segments experiencing such conditions to create composite exposure metrics. The product of these metrics represents the daily exposure of assets to severe fire weather and serves as a basis for ranking and selecting candidate days.

Technosylva filters weather days to exclude periods with low fire potential (below 50th percentile - VPD, HDWI, and wind gusts). Next, they cluster weather days by similarity in exposure characteristics within each National Weather Service Predictive Service Area to capture regional climatic differences. From each cluster, Technosylva performs stratified sampling, guaranteeing inclusion of the 50 highest-exposure days while also selecting additional representative days across the exposure spectrum. The result is a final set of weather days that reflect both the extreme and medium-to-high risk conditions across the service territory, forming a robust basis for wildfire simulation and risk analysis.

Annual Risk

Technosylva's FireSight modeling framework provides estimates of the POF and POI under a set of representative fire weather days. Each modeled day corresponds to a specific combination of meteorological and fuel conditions, allowing monetized wildfire risk to be calculated for that day. Because these modeled outputs represent expected risk under an average weather day rather than a full annual distribution, annualizing the results for integration into risk–benefit and cost-effectiveness analyses requires an additional step.

To derive an annualized risk metric, PacifiCorp analyzed the long-term WRF (Weather Research and Forecasting) reanalysis dataset (1991–2021) across its service territory to determine how often conditions similar to Technosylva's fire weather days occur in its service territory. The WRF reanalysis is a 30-year, 2-km gridded weather dataset produced by running the WRF mesoscale model with historical observations to re-create past atmospheric conditions. Using the same meteorological indicators employed by Technosylva—VPD, HDWI, and maximum wind gust—PacifiCorp identified days where these variables exceeded their 50th percentile thresholds at each WRF grid cell. Based on subject matter expert (SME) guidance, the Company also included the energy release component as a fuel dryness criterion, with a higher threshold of the 70th percentile to better reflect consequential fire potential. PacifiCorp computed thresholds using daily maximum values to capture each day's most fire-conducive period.

The Company limited the analysis to WRF pixels intersecting PacifiCorp's assets and aggregated results to a state-level average to represent typical conditions across the Oregon service territory. A WRF pixel refers to a single grid cell in the WRF model, representing a discrete unit of space where atmospheric variables are calculated. As it pertains to PacifiCorp's methodology, a WRF pixel is a 2-km × 2-km square. For each pixel, PacifiCorp calculated the number of days per year meeting all threshold criteria. The Company then used the mean count across all pixels as the representative frequency of fire weather days for Oregon. To reflect the increasing prevalence of high-risk fire weather under a warming climate, the most recent decade (2011–2021) was used to compute the average frequency while the Company used the full 30-year record for establishing robust percentile thresholds.

Finally, the expected daily monetized risk described below was multiplied by the average number of qualifying fire weather days per year to obtain an annualized monetized wildfire risk. This method maintains consistency with Technosylva's modeling framework while scaling results to an annual timeframe that reflects observed fire weather frequencies under contemporary climate conditions.

Monetized Risk Methodology

The first step in the monetized wildfire risk methodology is to develop an estimate of the impact of a wildfire event. The FireSight expected risk attributes of average acres burned and average buildings destroyed were used as the basis to assess monetized cost. To assess monetized cost, the selected attributes were multiplied by the costs per unit as assessed via a third-party study referenced under "Monetized Impact Assessment" below. The monetized impacts are categorized as safety, financial, or reliability. To assess financial impact, the average acres burned per simulation unit is multiplied by the constant values associated with fire suppression, economic loss specific to land use type, and restoration of damaged areas. Also included in the financial impact is the average buildings destroyed per simulation unit multiplied by the constant value for structures destroyed. The safety impact is based on an assumption of deaths, serious injuries, and minor injuries per building destroyed. The multiplier used to assess deaths per event is 0.0044 deaths per structure destroyed or one death per 227 structures destroyed. The United States Department of Transportation guidance provides a constant value of a statistical life for the entire country, which is currently set at $13.7 million. To assess the impact of injuries, a rate of 0.025 per fatality was used for serious injuries and 0.0003 per fatality for minor injuries.

Monetized Impact Assessment

In 2025, PacifiCorp partnered with a vendor to assess the economic impact of risk events in the Company's service territory. Using the precedent set by other utilities and related industries, the vendor researched monetized risk impact values leveraging publicly sourced data and research to develop monetized risk values for each state in PacifiCorp's service territory. Data sources for this research include the American Community Survey, the United States Department of Transportation, the Environmental Protection Agency, the Organization for Economic Co-operation and Development, the National Institute of Standards and Technology, and others. A complete list of sources can be found in Table H-4 in Appendix H. The key results of their research are displayed in Table 4-1 and Table 4-2 below.

Table 4-1: Monetized Impact Assessment Results by State

State	Fatalities	Injury	Structures	Suppression Cost	Commercial Acres
California	$13.7M/fatality	$3.425 M/serious injury $0.04 M/minor injury	Residential (Res): $478,784 Commercial (Comm): $908,492	$1,106/acre	Agricultural (Ag): $17,330/acre Pasture: $3,930/acre Timber: $3,400/acre
Washington	$13.7M/fatality	$3.425 M/serious injury $0.04 M/minor injury	Res: $575,091 Comm: $1.14 M	$872/acre	Ag: $3,410/acre Pasture: $940/acre Timber: $3,400/acre
Oregon	$13.7M/fatality	$3.425 M/serious injury $0.04M /minor injury	Res: $504,271 Comm: $988,591	$856/acre	Ag: $4,530/acre Pasture: $1,050/acre Timber: $3,400/acre

Table 4-2: Additional Monetized Impact Assessment Results by State

State	Fatalities per Structure	Restoration Cost per Acre	Direct Evacuation Cost per Person per Day	Dollar per CMI (24-hour Duration)	Dollar per CMI (12-hour Duration)
California	0.0044	$1,350	$158	Res: $0.04 Non-res: $4.3 All: $0.97	Res: $0.04 Non-res: $5.37 All: $1.21
Washington	0.0044	$1,350	$145	Res: $0.04 Non-res: $7.90 All:$1.4	Res: $0.04 Non-res: $9.88 All:$1.76
Oregon	0.0044	$1,350	$129	Res: $0.03 Non-res: $8.02 All: $1.15	Res: $0.04 Non-res: $10.03 All: $1.44

Risk Aggregation

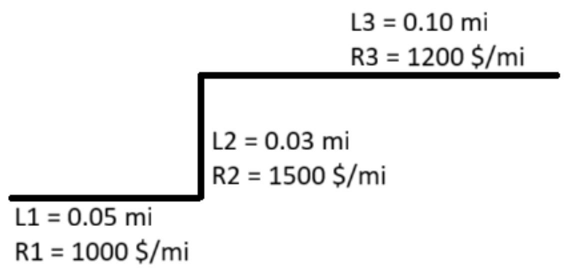
Following risk monetization, the process moves to risk aggregation where the monetized values from each simulation unit are systematically combined to ensure accurate results at the circuit segment level. As noted earlier, the risk quantification units have been standardized at the circuit segment using momentary ZOPs to delineate each circuit segment. A circuit can contain one or many circuit segments, and each circuit segment can contain one or many overhead conductor records. The length of an overhead conductor record is not multiplied by the number of phases in each span but rather consists of the length from one node to the other. Within an overhead conductor record, there can be one or many simulation units. These cardinal relationships are important for understanding how each risk component is aggregated from the simulation unit to the circuit segment.

Simulation Unit to Primary Overhead Conductor

The first stage of the aggregation process is the roll up of expected risk values from simulation units to primary overhead conductor records. The primary overhead conductor geospatial information system (GIS) records at PacifiCorp are delineated using line end vertices of electrical devices. Typically, primary overhead conductor records are longer than simulation units, meaning many simulation units are within one primary overhead conductor record. To aggregate exposure risk values from the simulation unit level to the primary overhead conductor level, the monetized expected risk values for each simulation unit are weighted according to their length within the primary overhead conductor and combined. This method avoids duplication of risk values from geographically close simulation units.

Primary Overhead Conductor to Circuit Segment

The second stage of the risk roll up process involves the aggregation of the primary overhead conductor risk values to the circuit segment level. The cardinal relationship between primary overhead conductor records to circuit segments is many-to-one, where many primary overhead conductor segments combine to make one circuit segment. To aggregate primary overhead conductor risk to circuit segment risk, the sum of the monetized, length-weighted expected risk of each primary overhead conductor record is totaled per segment. Figure 4-4 below shows the simulated circuit segment aggregation process, where multiple primary overhead conductor records are combined into an illustrative circuit segment wildfire risk score.



$$Aggregate\ Risk = L_1R_1 + L_2R_2 + L_3R_3$$

$$= \left(0.05mi * \frac{\$1000}{mi}\right) + \left(0.03mi * \frac{\$1500}{mi}\right) + \left(0.10mi * \frac{\$1200}{mi}\right)$$

$$= \$50 + \$45 + \$120$$

$$= \$215$$

Figure 4-4: Simulated Circuit Segment Aggregation Process

Risk Profile

The final step of the risk calculation process is to rank the segments using an ascending sequence from highest risk to lowest risk. The segment with the highest risk value is ranked No. 1 and so on until the lowest risk (with 1,123 circuit segments considered, the lowest risk segment would be ranked No. 1,123). The resulting risk profile provides the basis for the RSE calculation.

Mitigation Estimated Effectiveness

Mitigation program projected or estimated efficacy is currently based on subject matter expertise and is consistent with accepted parameters used by other utilities. PacifiCorp uses an approach to mitigation effectiveness designed to appropriately identify the right mitigation for the right situation. For instance, the RSE calculation may identify the most cost-effective mitigation for a circuit segment as covered conductor; however, if extreme trunk fall-in risk exists in the segment, it would be counterproductive for the model to recommend covered conductor as the chosen mitigation. As such, PacifiCorp has integrated variable efficacy rates based on conditions in the field that could make mitigations less effective.

Variable Covered Conductor Estimated Effectiveness PacifiCorp SMEs have identified the estimated effectiveness of covered conductor to be 65% in ideal conditions where failure modes such as wire slap and vegetation contact (non-trunk failure) are issues. Planning Model Version 2 accounts for the risk of potential tree trunk failures by varying the efficacy of covered conductor based on a vendor model that identifies vegetation contact risk. This model is based on vegetation height, canopy cover, and slope and identifies the severity of vegetation contact risk on a scale of 1-10, with 1 signifying no vegetation contact risk and 10 identifying the most severe vegetation contact risk. Also available in the output are useful attributes such as slope-adjusted tree canopy height, which can be compared to the average height of distribution lines to understand the risk of potential trunk failure. If the slope-adjusted vegetation height is greater than the line height, this may indicate a higher potential for trunk failure into an overhead line. For conductors identified as at-risk for trunk failure, the RSE uses a lower estimated effectiveness (50%), as shown in Table 4-3.

Table 4-3: Mitigation Program Estimated Efficacy Values

Mitigation Program	Efficacy – Upper Limit	Efficacy – Lower Limit
Undergrounding	98%	98%
Covered Conductor	65%	50%

Each conductor has a vulnerability to fall-in risk, estimated primarily by the relative height of trees to the pole height. With a high vulnerability to fall-in risk, there are higher risks of the kinds of faults that covered conductor has not been shown to be effective against, leading to a downgrading of the mitigatable risk. For a circuit segment, its constituent conductors can have different tree fall-in vulnerability, so the downgraded risk mitigation is calculated at the conductor level and then aggregated to the circuit segment by summing the mitigable risk for each conductor.

Program Cost

The estimated cost per mitigation program in PacifiCorp's service territory is listed in Table 4-4 below. Program costs are based on subject matter expertise from scoping engineers and operations personnel for undergrounding and covered conductor. Although actual costs may vary substantially from project to project, the values represent overall averages used for modeling and mitigation cost-efficiency calculations. The capital investments were adjusted to reflect the revenue requirements over each program's service life and discounted to present-day value. Assumptions for depreciation and rate of return are based on current approved rates.

Table 4-4: Estimated Cost per Mitigation Program

Mitigation Program	Cost per Mile (Millions)	Net Present Value of Revenue Requirement (Million)
Undergrounding	[redacted]	
Covered Conductor		

PSPS Risk

PacifiCorp includes in its cost-risk analysis the risk impact of the operational programs PSPS and ESS. PSPS risk is assessed to understand the costs associated with proactive shutoff of assets during high fire weather risk situations. To gauge the benefits and costs associated with grid hardening projects compared to PSPS operations, PSPS risk is quantified in U.S. dollars and added to the risk profile of each circuit segment. Similar to wildfire risk, PSPS risk is composed of two main risk factors: CoRE and LoRE.

PSPS CoRE

PSPS consequence is quantified in terms of reliability impacts. The reliability impacts include the number of customers affected per segment multiplied by customer minutes impacted (CMI) based on a 12-hour outage duration. Similar to the methodology observed in California, the vendor study quantified the cost per CMI per state that PacifiCorp serves based on Lawrence Berkeley National

Laboratory's Interruption Cost Estimate (ICE) calculator, version 2.0. The ICE calculator contains default input values per state served by PacifiCorp, which allows for a targeted dollar per CMI calculation. Given the customization capabilities of the ICE calculator, the vendor adjusted the default values using PacifiCorp-specific inputs where available to generate the most accurate assessment of cost per CMI possible.

PSPS LoRE

PSPS LoRE assesses the likelihood that a PSPS risk event will occur on an annual basis. The limited availability of past PSPS event data does not lend itself to a viable historical PSPS analysis. In the absence of statistically viable historic PSPS event data, PacifiCorp identified the thresholds that best indicate the conditions for a potential PSPS. Using these thresholds, a study of WRF reanalysis data was conducted to estimate the number of past potential PSPS events per segment that would have occurred given those thresholds. Using this analysis, a PSPS likelihood per circuit segment was derived by multiplying the number of days that a segment was in PSPS conditions by the average number of hours (12) per PSPS event.

ESS Risk

In addition to PSPS risk, PacifiCorp's outage program risk mitigations include ESS. Similar to PSPS, ESS is a mitigation that, while reducing wildfire risk, includes reliability and potential safety issues associated with the impacts from de-energization. Understanding the risk associated with ESS within the context of the larger wildfire mitigation program is important for maximizing overall risk reduction when considering grid hardening mitigations. Consistent with wildfire and PSPS risk, ESS risk is composed of LoRE and CoRE components. Unlike PSPS, PacifiCorp has sufficient historical ESS outage data to calculate an ESS consequence and likelihood.

ESS CoRE

PacifiCorp calculates the consequence of ESS in the same monetary units as wildfire and PSPS risk. The reliability aspect of ESS consequence is calculated based on CMI multiplied by the duration of ESS event per segment. Each ESS device's outage history is queried and used to determine its annual ESS outage rate and average ESS outage duration, which when multiplied together give an expected number of minutes that the device is out when ESS is activated per year. For each primary overhead conductor downstream of that ESS device, PacifiCorp can say it also goes out that same number of expected minutes per year. This single primary overhead conductor may be downstream of multiple ESS devices, and so a single primary overhead conductor's annual expected minutes is the sum of the annual expected minutes of all ESS devices above it. To get CMI, the Company multiplies by the number of accounts connected to that line. To get the total number of CMI for a circuit segment, PacifiCorp sums the CMI of all primary overhead conductors in the segment. The ESS outage duration per year is multiplied by CMI based on a six-hour duration using the ICE calculator values also used for PSPS consequence.

ESS LoRE

ESS likelihood is assessed per circuit segment by multiplying the historic ESS outages per segment by annual ESS outage minutes. Historic ESS events are tracked in PacifiCorp's reliability database through a Boolean column that indicates whether a device was in ESS settings during the time of the outage.

4.2.4 Monetized RSE Analysis

In 2025, PacifiCorp developed an RSE framework (Figure 4-5) based on benefit-cost ratios as a replacement for the earlier unitless risk score calculations. Benefit-cost ratios are useful for showing the cost effectiveness per mitigation program.

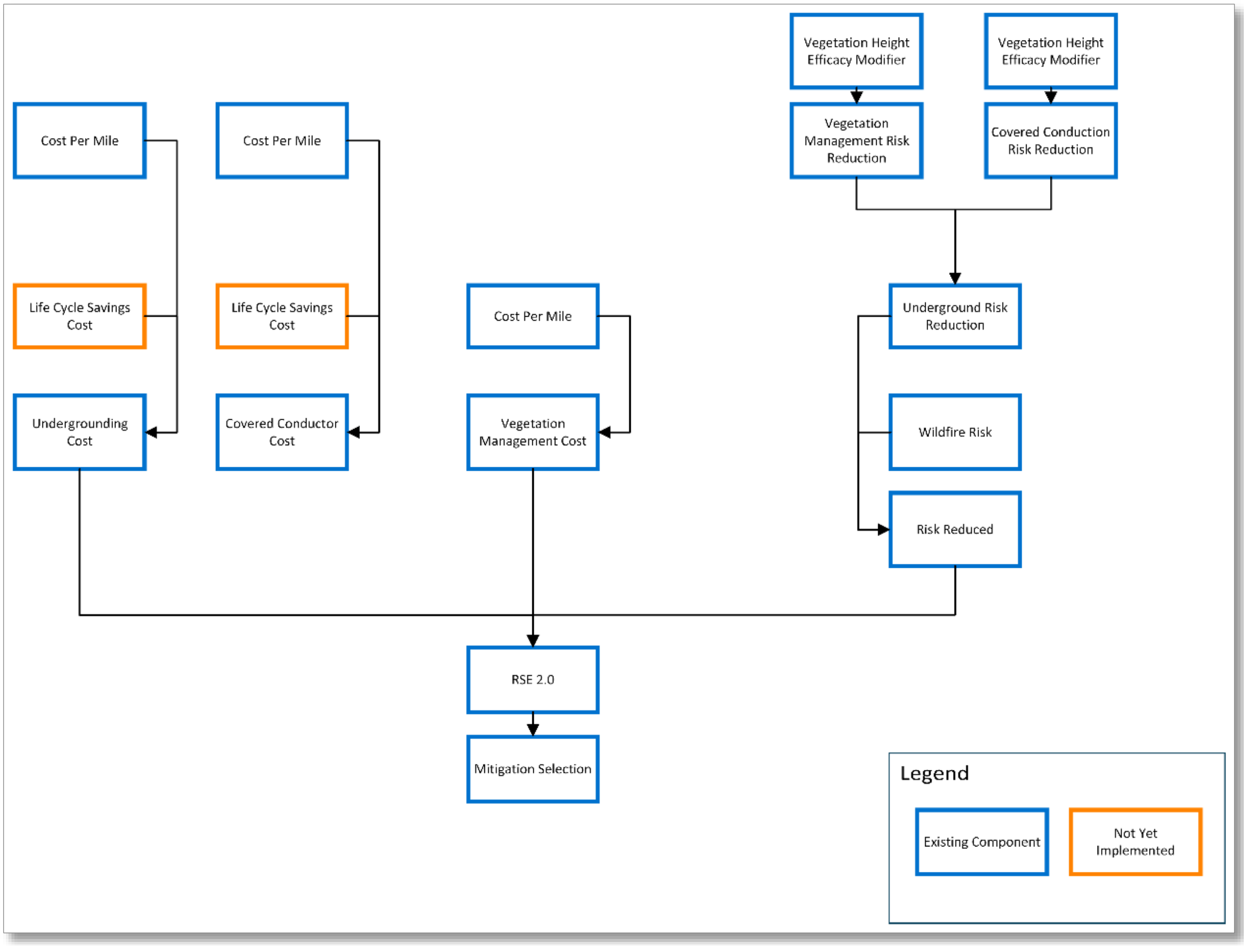


Figure 4-5: PacifiCorp's Risk Spend Efficiency (RSE) Framework

The first step in the process is to take the monetized total risk per segment and calculate a risk reduction per mitigation program. As described in Section 4.2.3, each program has a cost and mitigation efficacy associated with the work to be performed. For every segment, risk reduction is calculated considering undergrounding and covered conductor. See Variable Covered Conductor Estimated Effectiveness in Section 4.2.3 for details regarding the variation of covered conductor effectiveness. Based on the efficacy per program, the risk reduction is calculated. Likewise, the cost per mitigation project is calculated per segment by multiplying the mileage of each segment by its program cost per mile. See Program Cost in Section 4.2.3 for the cost of each mitigation program considered in the RSE calculation.

Lifecycle Benefits

Lifecycle cost savings for undergrounding are included in the RSE. The Company's assumption for the lifespan of grid hardening mitigations of undergrounding and covered conductor is 50 years.

Lifecycle benefits for the undergrounding mitigation program include operations and maintenance (O&M) savings, vegetation management savings, and savings associated with PSPS and ESS operations. Over the lifetime of underground assets, PacifiCorp's RSE calculations assume vegetation management will not be needed because vegetation-related faults are mitigated with undergrounded assets. The RSE calculations further assume PSPS and ESS benefits are achieved with undergrounding assets as wildfire risk due to wind-related incidents is drastically reduced with undergrounding. PSPS and ESS benefits are contingent on network alignment and the undergrounding of related circuit segments. An added benefit of undergrounding assets is the reduction of O&M costs compared with overhead assets. The O&M costs data comes from analyzing PacifiCorp work orders that are associated with overhead and underground preventive maintenance, corrective maintenance, and operating maintenance. Overhead and underground O&M costs were assessed per state and applied to the lifecycle savings of undergrounding.

RSE is calculated as a ratio to the benefits of a given hardening mitigation to the cost of that mitigation. The benefits are the expected wildfire risk reduction over the expected lifespan of the hardened asset. In addition, hardening methods that can reduce lifecycle costs, such as removing the need for vegetation management, reducing ongoing O&M costs, and allowing sectionalizing devices to remain in normal settings are included as co-benefits to the wildfire risk reduction. A program is considered cost-efficient if its RSE is greater than or equal to one, which indicates equal or more value received from the program's implementation compared to cost.

RSE Equation

$$\text{Benefit-Cost Ratio (BCR)} = \frac{\textbf{Total Present Value of Benefits}}{\textbf{Total Present Value of Costs}}$$

Total Present Value of Benefits = Asset Life Wildfire Risk Reduction + Asset Life Lifecycle Cost Savings

Total Present Value of Costs = Cost per Program

Mitigation Selection Framework

Planning Model Version 2 includes a mitigation selection framework. PacifiCorp's mitigation framework starts with an assumption that the least costly mitigation will mitigate sufficient risk. In this manner, the selection process will apply the least costly mitigation per segment that has passed the RSE threshold. Risk reduction is subsequently calculated, which is followed by another RSE assessment of the next costliest mitigation on the remaining risk. If the RSE threshold is met for that mitigation, the risk reduction is calculated, which is followed by another RSE calculation for the highest cost mitigation on the remaining risk. Should the highest cost mitigation pass the RSE threshold, it is proposed as the mitigation recommendation. This process ensures that the costliest mitigations are only proposed where the risk is not adequately mitigated by lower-cost programs and provides a mechanism for the streamlined inclusion of other mitigation programs. This process is known as "reserve tree mitigation selection."

Mitigation Selection Process

1. Implement covered conductor where new RSE for covered conductor is ≥1.
   a. Calculate new monetized total risk after covered conductor mitigation is applied.
   b. Recalculate undergrounding RSEs using the reduced monetized total.
2. Implement undergrounding where new undergrounding RSE is ≥1.

Validation

The changes made to PacifiCorp's risk quantification methodology in 2025 span monetization, RSE incorporation, and a mitigation recommendation framework. Considering the magnitude of these changes, validation steps have been incorporated to evaluate the model results. To understand how the risk output changed between model versions, a comparison of the relative risk from PacifiCorp's original model (Planning Model Version 1) to Planning Model Version 2 was conducted. The results are shown in the maps below (Figure 4-6 and Figure 4-7). The maps symbolize each dataset based on a six-quantile view of the data. The result is that each dataset is separated into six categorical symbols based on the distribution of each dataset. This symbology provides a view of risk alignment and deviation given the difficulty of comparing datasets with diverse risk scaling. As a final calibration step, risk scores were modified based on the intersection of primary overhead conductor with the low-risk polygons identified by the PacifiCorp Meteorology team.

Model verification is accomplished via Python development environment controls and protocols. Current practice requires that changes to release models undergo at least one review by a member of the model development team. This step involves the evaluation of new logic as well as a code review to ensure that both theoretical assumptions and the new code reflect the intended updates.

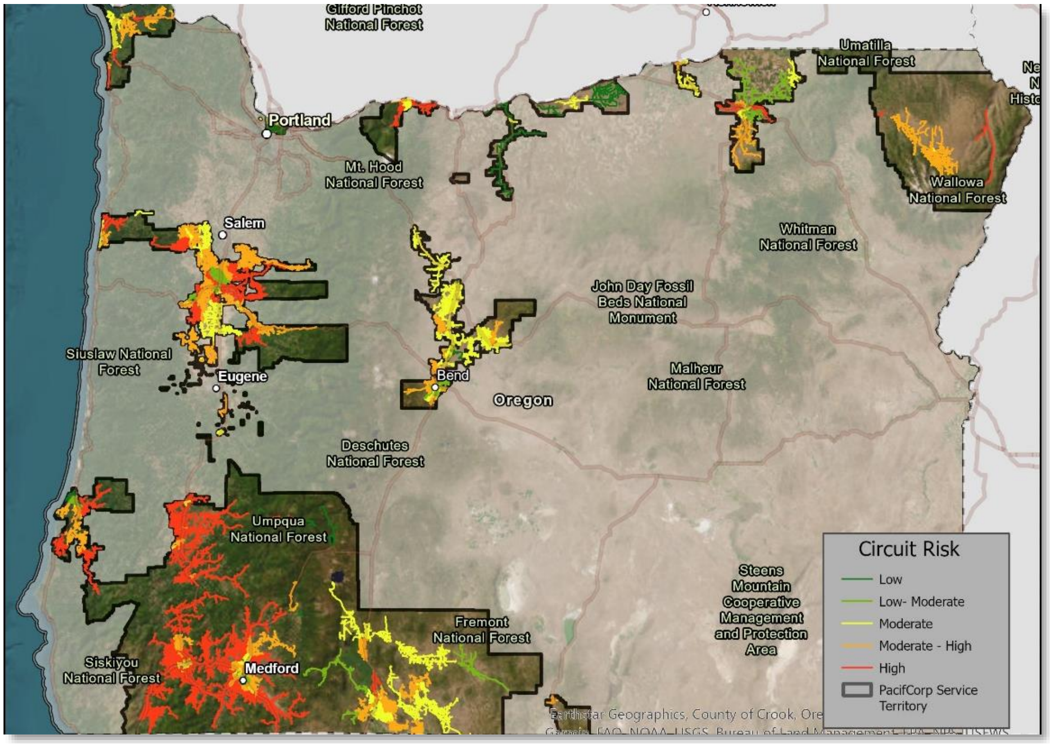


Figure 4-6: Relative Wildfire Risk across PacifiCorp's Oregon Service Territory Based on Planning Model Version 1

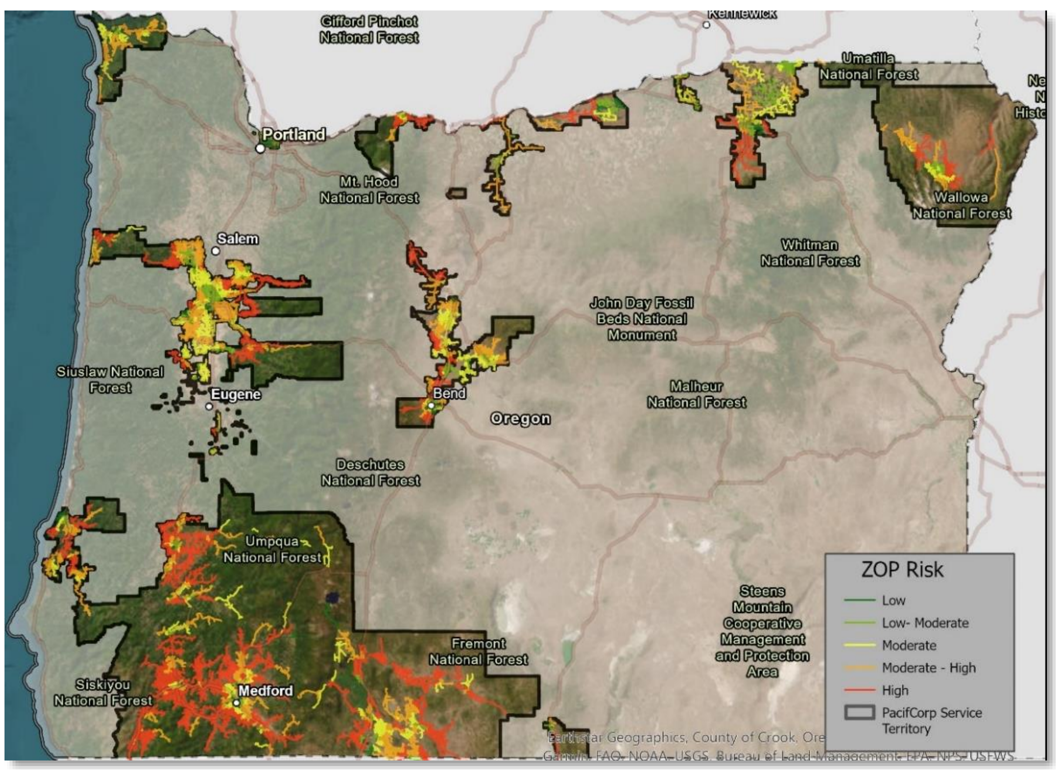


Figure 4-7: Relative Wildfire Risk across PacifiCorp's Oregon Service Territory Based on Planning Model Version 2

4.3 Outage Risk Driver Analysis and Results

Ignition risk drivers are directly mapped to the Company's outage cause categories. PacifiCorp has actively participated in workshops with other IOUs to discuss ignition risk driver mapping and will continue to engage in these sessions, making adjustments where appropriate. The association between ignition risk drivers and outage cause categories is shown in Table 4-5 below. PacifiCorp applies the same association in its data template submissions.

Table 4-5: Ignition Risk Drivers and Associated Outage Cause Categories

Oregon Risk/Ignition Event Type	Oregon Risk Event Driver (Subcategory)	PacifiCorp Direct Cause	PacifiCorp Direct Cause Category
Contamination	Contamination	Contamination	Environment
Contamination	Contamination	Pole Fire	Fire
Equipment	Degradation (including Structural Elements, Line Elements, Protective/Control Device, Voltage Control, Other, and Unknown)	Deterioration or Rotting	Equipment Failure
Equipment	Equipment Error (including Structural Elements, Line Elements, Protective/Control Device, Voltage Control, Other, and Unknown)	Broken Equipment	Equipment Failure
Equipment	Equipment Error – Voltage Control	Overload	Equipment Failure
Equipment	Environmental (including Structural Elements, Line Elements, Protective/Control Device, and Voltage Control)	Condensation Moisture	Environment
Equipment	Environmental – Other	Wind	Weather
Equipment	Environmental – Other	Flooding	Environment
Equipment	Environmental – Other	Freezing & Frost	Weather
Equipment	Environmental – Other	Ice	Weather
Equipment	Environmental – Other	Snow, Sleet, and Blizzard	Weather
Equipment	Other (including Structural Elements, Line Elements, Control Device, Voltage Control, Protective/Control Device, Other, and Unknown)	Other, Known Cause	Other
Fire	Fire	Fire/Smoke (Not Due to Faults)	Environment
Lightning	Direct Strike	Lightning	Weather
Lightning	Lightning	Lightning	Weather
Public Contact	Dig-in	Dig-in (Non-PacifiCorp Personnel)	Interference
Public Contact	Fire/Police		

Oregon Risk/Ignition Event Type	Oregon Risk Event Driver (Subcategory)	PacifiCorp Direct Cause	PacifiCorp Direct Cause Category
Public Contact	Foreign Contact – Third-party Contact	Other Utility/Contractor	Interference
Public Contact	Foreign Contact – Aircraft Vehicle Contact	Vehicle Accident	Interference
Public Contact	Foreign Contact – Balloon Contact	Other Interfering Object	Interference
Public Contact	Foreign Contact – Land Vehicle Contact	Vehicle Accident	Interference
Public Contact	Foreign Contact – Vandalism/Theft	Vandalism or Theft	Interference
Public Contact	Other	Other Interfering Object	Interference
Wildlife Contact	Bird	Bird Mortality (Non-Protected Species)	Animals
Wildlife Contact	Bird	Bird Mortality (Protected Species) (BMTS)	Animals
Wildlife Contact	Bird	Bird Nest (BMTS)	Animals
Wildlife Contact	Bird	Bird Suspected, No Mortality	Animals
Wildlife Contact	Mammal, Reptile/Amphibian, Other/Unknown	Animals	Animals
Other	Utility Error/Other	PacifiCorp Employee – Dispatch	Operational
Other	Utility Error/Other	PacifiCorp Employee – Field	Operational
Other	Utility Error/Other	PacifiCorp Employee – Sub	Operational
Other	Utility Error/Other	Internal Contractor	Operational
Other	Utility Error/Other	Internal Tree Contractor	Operational
Other	Utility Error/Other	Switching Error	Operational
Other	Utility Error/Other	Improper Protective Coordination	Operational
Other	Utility Error/Other	Faulty Install	Operational
Other	Utility Error/Other	Testing/Startup Error	Operational
Other	Utility Error/Other	Incorrect Records	Operational
Unknown	Unknown	Unknown	Other
Vegetation	Outside Clearance Zone	Tree – Non-Preventable	Trees
Vegetation	Within Clearance Zone	Tree – Trimmable	Trees
Vegetation	Other	Tree – Felled by Logger	Trees
Wire Down	Wire Down		
Wire-to-Wire Contact	Wire-to-Wire Contact		

Text mining techniques are used to identify wire down, wire-to-wire, and balloon contact events. Wire down events are flagged when the word "down" appears in outage comments, followed by manual review to confirm whether it relates to a downed wire interruption. For wire-to-wire contact, keywords such as “wire to wire,” “sag,” “slack,” “slap,” “gallop,” “together,” and “wrap” are used to identify potential events. Balloon contact events are flagged using the keyword “ballo.”

4.4 Asset Risk Driver Analysis and Results

PacifiCorp uses outage data in the POF calculation of its wildfire risk likelihood component or LoRE as described in Section 4.2.3. The Company will continue to evolve its approach in accordance with industry best practices and the plans described in Sections 4.7 and Section 4.8.

4.5 Qualitative Analysis and Results

PacifiCorp does not have a qualitative ignition risk adjustment for its risk model and RSE calculations.

Table OPUC 4-1: PacifiCorp’s Oregon Service Territory Electrical Infrastructure

Risk Adjustment	Applicable Situations	Initial Scoring	Adjustment Factor	Final Scoring
NA	NA	NA	NA	NA

4.6 Circuit Segment Risk Results

The results of PacifiCorp’s circuit segments risk analysis as described in Section 4.2.3 are provided in Table 4-6 below. These circuit segments represent the top 5% of risk in the Company’s service territory. Circuit segments that are highlighted in orange are part of circuits that were ranked the highest risk circuits in the 2025 WMP Update.[5] Circuit segments that are highlighted in green are part of circuits planned where mitigation is planned in the 2026–2028 WMP cycle. Circuit segments highlighted in blue are part of circuits that were ranked the highest risk circuits in the 2025 WMP Update and that have mitigation planned in the 2026–2028 WMP cycle.

[5] PacifiCorp. 2025 Wildfire Mitigation Update. Revision 1. Page 38.

Table 4-6: Ranking of the Circuit Segments with the Top 5% of Risk

Wildfire Risk Rank	ZOP	Circuit	District	Wildfire Risk	ESS Risk	PSPS Risk	Overall Risk
1	ARL_CB5K25	5K25	Hermiston	4,622,032	567	7.85	4,622,607
2	RC_310410_991510143	5K70	Hood River	3,600,952	487	0.75	3,601,441
3	CHH_CB5D142	5D142	Bend	3,550,380	3,178	-	3,553,559
4	RC_338705_1710536103	4U81	Roseburg	3,191,886	5,563	2.78	3,197,452
5	RC_315504_408010367	5L55	Klamath Falls	2,952,188	3,584	13.32	2,955,785
6	RC_152100_1740836653	4R33	Grants Pass	2,819,139	48,918	12.83	2,868,070
7	RC_132000_1620246784	4M134	Corvallis	2,536,131	509	12.1	2,536,652
8	RC_289861_1742098737	5R53	Grants Pass	2,279,905	400	4.27	2,280,309
9	RC_284701_251540202	4M209	Junction City	2,027,858	492	1.74	2,028,352
10	RC_190702_1711286849	5U84	Roseburg	2,010,053	9,851	4.14	2,019,908
11	RC_046660__3384623	5L37	Klamath Falls	1,749,974	1,029	3.56	1,751,007
12	RC_100600__4502238	4R33	Grants Pass	1,739,329	28,955	20.17	1,768,303
13	RC_223901_1603872320	4D131	Redmond	1,681,672	6,515	0.39	1,688,187
14	RC_115900_267480159	4M37	Lebanon	1,678,426	4,234	1.75	1,682,662
15	MLN_CB5R234	5R234	Grants Pass	1,610,819	3,362	11.89	1,614,193
16	NLY_CB4M120	4M120	Stayton	1,592,923	-	2.94	1,592,926
17	RC_152441_176580340	4U39	Roseburg	1,591,097	3,273	1.89	1,594,372
18	RC_072201_802520342	5W202	Pendleton	1,576,490	152	3.88	1,576,646
19	RC_162800_1740836648	4R34	Grants Pass	1,447,610	5,937	7.81	1,453,555
20	RC_153402_1711090569	4U22	Roseburg	1,443,566	330	7.15	1,443,903
21	PRO_CB5W406	5W406	Pendleton	1,432,445	2,993	2.72	1,435,440
22	RC_174901_798500266	4D68	Madras	1,432,137	4,399	3.53	1,436,539
23	RC_303500_1740010885	5R63	Grants Pass	1,402,214	10,264	3.49	1,412,482
24	RC_276900_1221219697	5R103	Medford	1,360,283	1,475	27.9	1,361,786
25	RC_131502__8305108	5R67	Grants Pass	1,347,962	52,855	7.4	1,400,825
26	ALA_CB5R245	5R245	Medford	1,346,172	2,819	2.26	1,348,994
27	RC_293000__3492922	5L36	Klamath Falls	1,332,534	4,689	0.35	1,337,223
28	RC_248921_1605993842	5D144	Bend	1,329,268	3,456	-	1,332,724
29	RC_369116_408010368	5L55	Klamath Falls	1,319,548	11,752	6.17	1,331,307
30	SIO_CB5M126	5M126	Stayton	1,253,084	421	1.02	1,253,506
31	RC_067602__3838462	4M117	Albany	1,231,466	1,205	3.54	1,232,674
32	WIN_CB5U17	5U17	Roseburg	1,227,228	258	0.04	1,227,486
33	HMK_CB5L55	5L55	Klamath Falls	1,221,711	572	3.36	1,222,286

Wildfire Risk Rank	ZOP	Circuit	District	Wildfire Risk	ESS Risk	PSPS Risk	Overall Risk
34	RC_200402_1710567122	4U81	Roseburg	1,206,221	1,542	1.86	1,207,765
35	RC_216301_1742098841	5R53	Grants Pass	1,173,043	263	6.02	1,173,312
36	RC_358901_380610373	5L57	Klamath Falls	1,167,103	3,279	4.85	1,170,387
37	RC_202900__6029884	5R248	Grants Pass	1,141,779	9,178	3.72	1,150,961
38	RC_028902_1741874040	5R52	Grants Pass	1,134,855	475	6.15	1,135,336
39	RC_161302_1742099573	5R259	Grants Pass	1,122,580	4,344	8.15	1,126,932
40	SPR_CB5L8	5L8	Klamath Falls	1,098,337	407	8.2	1,098,753
41	TAK_CB4R9	4R9	Medford	1,087,284	2,365	32.79	1,089,682
42	RC_024302_1221219329	5R206	Medford	1,055,800	2,087	11	1,057,898
43	RC_165304__6946415	5R259	Grants Pass	1,040,061	5,015	6.79	1,045,083
44	PVT_CB5R67	5R67	Grants Pass	1,029,123	3,518	5.28	1,032,647
45	RC_104700_372690147	5R68	Medford	1,020,582	4,000	12.13	1,024,594
46	CLO_CB4U38	4U38	Roseburg	1,016,846	5,104	8.61	1,021,959
47	RC_201402_1711251707	5U19	Roseburg	1,016,159	243	0.73	1,016,403
48	RC_292501_1752722724	5R284	Medford	1,015,296	4,415	8.46	1,019,719
49	FS_175420__10144888	5D120	Bend	1,006,776	108	-	1,006,884
50	RC_064561_1741633985	5R62	Grants Pass	1,003,603	1,741	5.21	1,005,349
51	MLN_CB5R251	5R251	Grants Pass	982,489	647	5.44	983,141
52	RC_099902_1750010418	5R182	Medford	942,574	513	9.33	943,096
53	PCT_CB5R40	5R40	Medford	935,231	1,250	9.71	936,491
54	FS_323000__4884315	4M238	Dallas	922,307	1,469	2.26	923,778
55	FCR_CB4R34	4R34	Grants Pass	913,746	4,903	11	918,661
56	RC_260100_1753704599	5R238	Medford	901,925	23,953	3.24	925,881
57	RC_241404_1711074134	5U2	Roseburg	893,825	38,850	10.48	932,685
58	RC_260710_1742231013	5R334	Grants Pass	885,201	4,830	28.28	890,059
59	APP_CB5R278	5R278	Grants Pass	884,063	2,926	2.24	886,991

High-risk circuit in the 2025 WMP Update	High-risk circuit in 2025 WMP Update; mitigation planned in the 2026–2028 WMP cycle	Mitigation planned in the 2026–2028 WMP cycle

Risk Output

PacifiCorp's highest wildfire risk circuit segments span many districts throughout the state; however, they typically exist in areas with adequate fuel and within close proximity to customers. As shown in

Figure 4-8, Figure 4-9, and Figure 4-10 below, the top three wildfire risk records all intersect the Oregon Department of Forestry (ODF) wildland-urban interface (WUI) area.

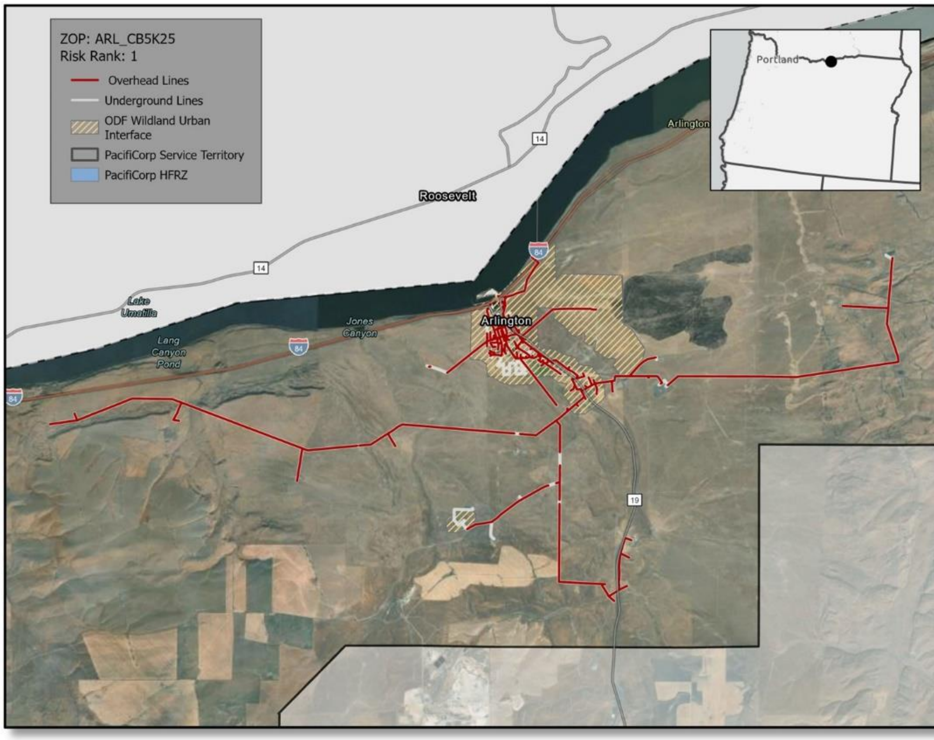


Figure 4-8: Circuit Segment with Risk Rank 1 and ODF Wildland-urban Interface Near Arlington, Oregon

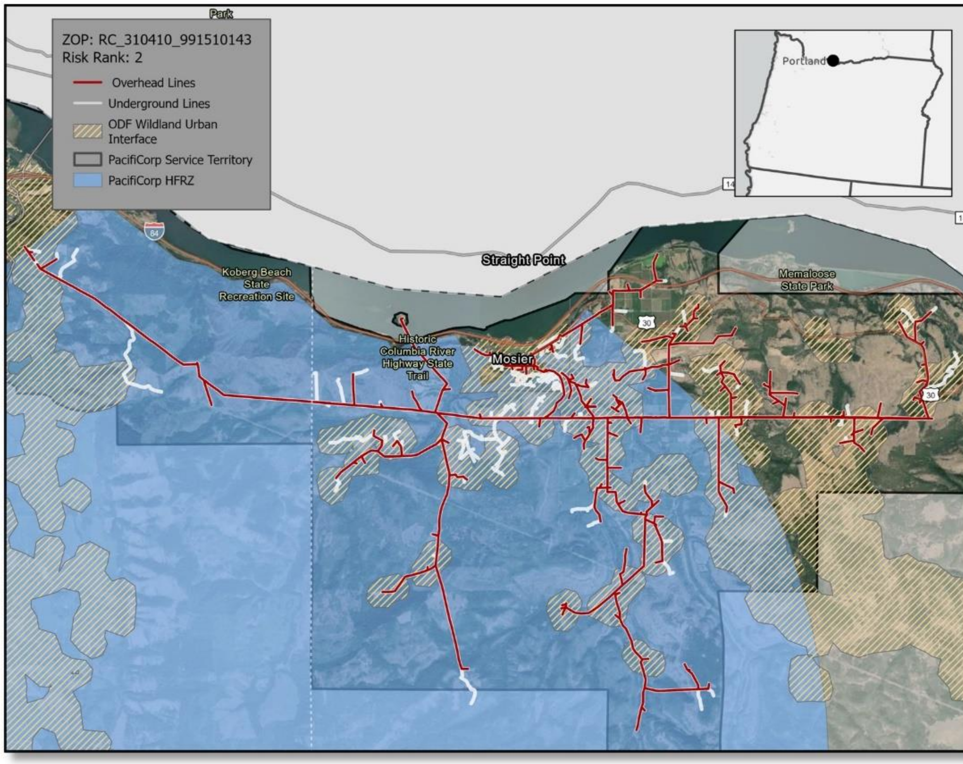


Figure 4-9: Circuit Segment with Risk Rank 2 and ODF Wildland-urban Interface Near Mosier, Oregon

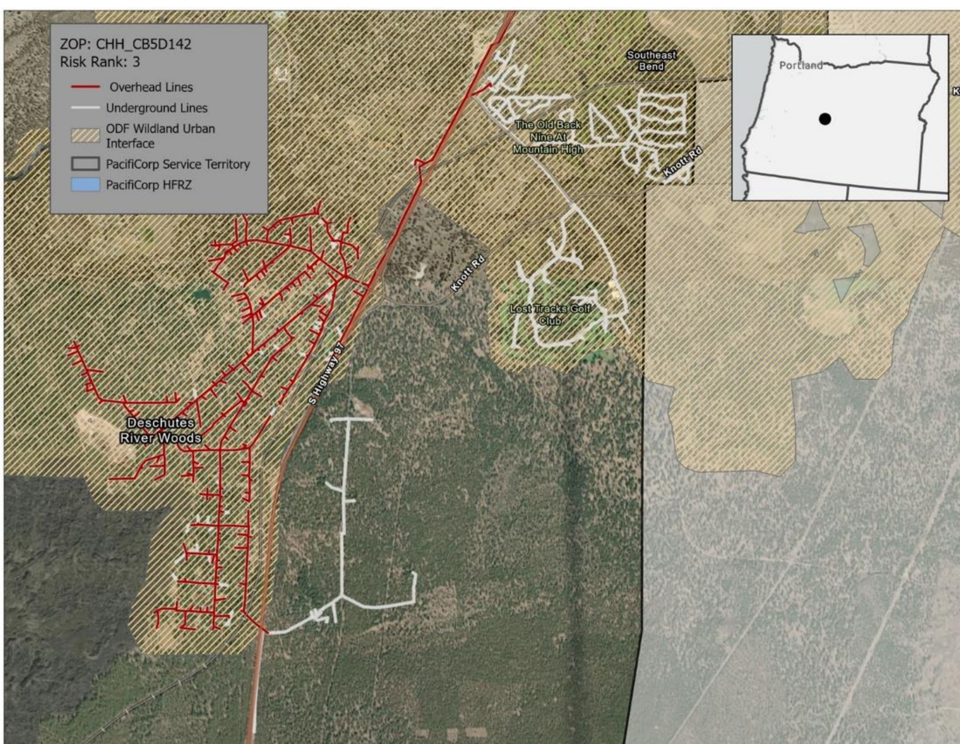


Figure 4-10: Circuit Segment with Risk Rank 3 and ODF Wildland-urban Interface Near Bend, Oregon

The results of PacifiCorp's monetized RSE analysis for the circuit segments that represent the top 5% of risk, applying the methodology described in Section 4.2.4, are provided in Table 4-7.

Table 4-7: Mitigation Recommendation and RSE Calculation for the Riskiest Circuit Segments

Wildfire Risk Rank	ZOP	Circuit	District	Recommended Mitigation	RSE
1	ARL_CB5K25	5K25	Hermiston	Covered Conductor	2.63
2	RC_310410_991510143	5K70	Hood River	Underground	1.40
3	CHH_CB5D142	5D142	Bend	Underground	1.27
4	RC_338705_1710536103	4U81	Roseburg	Underground	1.10
5	RC_315504_408010367	5L55	Klamath Falls	Covered Conductor	1.28
6	RC_152100_1740836653	4R33	Grants Pass	Underground	1.08
7	RC_132000_1620246784	4M134	Corvallis	Underground	1.32
8	RC_289861_1742098737	5R53	Grants Pass	Underground	1.44
9	RC_284701_251540202	4M209	Junction City	Covered Conductor	1.72
10	RC_190702_1711286849	5U84	Roseburg	Covered Conductor	1.03
11	RC_046660__3384623	5L37	Klamath Falls	Underground	1.75
12	RC_100600__4502238	4R33	Grants Pass	Underground	1.58
13	RC_223901_1603872320	4D131	Redmond	No Line Rebuild Recommended	RSE < 1
14	RC_115900_267480159	4M37	Lebanon	No Line Rebuild Recommended	RSE < 1
15	MLN_CB5R234	5R234	Grants Pass	No Line Rebuild Recommended	RSE < 1
16	NLY_CB4M120	4M120	Stayton	No Line Rebuild Recommended	RSE < 1
17	RC_152441_176580340	4U39	Roseburg	Covered Conductor	1.24
18	RC_072201_802520342	5W202	Pendleton	Underground	1.60
19	RC_162800_1740836648	4R34	Grants Pass	Underground	1.07
20	RC_153402_1711090569	4U22	Roseburg	Covered Conductor	1.33
21	PRO_CB5W406	5W406	Pendleton	No Line Rebuild Recommended	RSE < 1
22	RC_174901_798500266	4D68	Madras	No Line Rebuild Recommended	RSE < 1
23	RC_303500_1740010885	5R63	Grants Pass	No Line Rebuild Recommended	RSE < 1
24	RC_276900_1221219697	5R103	Medford	Underground	1.15
25	RC_131502__8305108	5R67	Grants Pass	No Line Rebuild Recommended	RSE < 1
26	ALA_CB5R245	5R245	Medford	No Line Rebuild Recommended	RSE < 1

Wildfire Risk Rank	ZOP	Circuit	District	Recommended Mitigation	RSE
27	RC_293000__3492922	5L36	Klamath Falls	Covered Conductor	1.10
28	RC_248921_1605993842	5D144	Bend	No Line Rebuild Recommended	RSE < 1
29	RC_369116_408010368	5L55	Klamath Falls	Covered Conductor	1.23
30	SIO_CB5M126	5M126	Stayton	No Line Rebuild Recommended	RSE < 1
31	RC_067602__3838462	4M117	Albany	No Line Rebuild Recommended	RSE < 1
32	WIN_CB5U17	5U17	Roseburg	Covered Conductor	1.51
33	HMK_CB5L55	5L55	Klamath Falls	Covered Conductor	1.20
34	RC_200402_1710567122	4U81	Roseburg	Covered Conductor	1.38
35	RC_216301_1742098841	5R53	Grants Pass	Underground	1.08
36	RC_358901_380610373	5L57	Klamath Falls	No Line Rebuild Recommended	RSE < 1
37	RC_202900__6029884	5R248	Grants Pass	No Line Rebuild Recommended	RSE < 1
38	RC_028902_1741874040	5R52	Grants Pass	No Line Rebuild Recommended	RSE < 1
39	RC_161302_1742099573	5R259	Grants Pass	Underground	1.12
40	SPR_CB5L8	5L8	Klamath Falls	No Line Rebuild Recommended	RSE < 1
41	TAK_CB4R9	4R9	Medford	No Line Rebuild Recommended	RSE < 1
42	RC_024302_1221219329	5R206	Medford	No Line Rebuild Recommended	RSE < 1
43	RC_165304__6946415	5R259	Grants Pass	Underground	1.61
44	PVT_CB5R67	5R67	Grants Pass	No Line Rebuild Recommended	RSE < 1
45	RC_104700_372690147	5R68	Medford	No Line Rebuild Recommended	RSE < 1
46	CLO_CB4U38	4U38	Roseburg	No Line Rebuild Recommended	RSE < 1
47	RC_201402_1711251707	5U19	Roseburg	Covered Conductor	1.78
48	RC_292501_1752722724	5R284	Medford	No Line Rebuild Recommended	RSE < 1
49	FS_175420__10144888	5D120	Bend	Underground	1.47
50	RC_064561_1741633985	5R62	Grants Pass	No Line Rebuild Recommended	RSE < 1
51	MLN_CB5R251	5R251	Grants Pass	No Line Rebuild Recommended	RSE < 1
52	RC_099902_1750010418	5R182	Medford	Covered Conductor	1.53
53	PCT_CB5R40	5R40	Medford	Underground	1.02

Wildfire Risk Rank	ZOP	Circuit	District	Recommended Mitigation	RSE
54	FS_323000__4884315	4M238	Dallas	Covered Conductor	1.21
55	FCR_CB4R34	4R34	Grants Pass	No Line Rebuild Recommended	RSE < 1
56	RC_260100_1753704599	5R238	Medford	No Line Rebuild Recommended	RSE < 1
57	RC_241404_1711074134	5U2	Roseburg	No Line Rebuild Recommended	RSE < 1
58	RC_260710_1742231013	5R334	Grants Pass	Underground	1.26
59	APP_CB5R278	5R278	Grants Pass	No Line Rebuild Recommended	RSE < 1

The OPUC RSE Workbook

In accordance with OPUC guidance, the Company discusses the OPUC RSE Workbook in Appendix J Table OPUC 4-2 below is structurally aligned with the OPUC RSE Workbook and not PacifiCorp's Planning Model Version 2. Planning Model Version 2 does not produce risk scores associated with the subcategories HFRZ, outage risk driver, asset risk driver, and qualitative risk. The Company provides the results of its risk modeling and RSE calculation in Table 4-7 above rather than in Table OPUC 4-2. The Company provides inputs for Table OPUC 4-2 using the OPUC RSE Workbook in Appendix J

Table OPUC 4-2: Riskiest Circuit Segment Scores

Circuit Segment ID	Geographical Designated Area (ID and Name)	HFRZ Score	Outage Risk Driver Score	Asset Risk Driver Score	Qualitative Risk Score	Combined Risk Score
N/A	N/A	N/A	N/A	N/A	N/A	N/A

4.7 Initiatives and Targets

In this section, PacifiCorp presents its initiatives and targets for the 2026–2028 WMP cycle. Discussion of the initiatives is in Section 4.8.

4.7.1 Initiative Summary Table

In Table OPUC 4-3, PacifiCorp presents its 2026–2028 initiatives and targets in Wildfire Mitigation Strategy Development, which are described further below.

Table OPUC 4-3: Risk Methodology Initiative Cost Summary in Thousands

Initiative Activity	Tracking ID	Target Unit	2026 Target	2026 Forecast ($1,000)	2027 Target	2027 Forecast ($1,000)	2028 Target	2028 Forecast ($1,000)	Three-Year Total ($1,000)	Section
Model Validation and Verification	OR-RA-05	Qualitative	Verification module that will track model changes from version to version implemented	[redacted]	N/A	[redacted]	N/A	[redacted]	[redacted]	4.8
Climate Change Planning Model Component	OR-RA-06	Qualitative	N/A	[redacted]	Adjust wildfire risk scores based on climate change assessments.	[redacted]	N/A	[redacted]	[redacted]	4.8
Third-Party Review of Modeling	OR-RA-07	Qualitative	Complete third-party review	[redacted]	N/A	[redacted]	N/A	[redacted]	[redacted]	4.8
HFRZ Update	OR-RA-08	Qualitative	Update HFRZ	[redacted]	Evaluation of further changes to HFRZ	[redacted]	Evaluation of further changes to HFRZ	[redacted]	[redacted]	4.8
Portfolio Optimization	OR-RA-09	Qualitative	Provide a framework for model-based mitigation recommendations that can be used to plan grid hardening projects.	[redacted]	N/A	[redacted]	N/A	[redacted]	[redacted]	4.8
Data Science Team	OR-RA-10	N/A	N/A	[redacted]	N/A	[redacted]	N/A	[redacted]	[redacted]	

Initiatives OR-RA-05, OR-RA-06, and OR-RA-09 are developed in-house by PacifiCorp's Data Science team; the costs for these initiatives and the Data Science team's time are reflected in OR-RA-10.

4.8 Continuous Improvement

The initiatives listed in Table OPUC 4-3 are intended to improve PacifiCorp's long-term risk modeling and portfolio optimization. They are summarized below.

4.8.1 HFRZ Update

Tracking ID: OR-RA-08

PacifiCorp's current HFRZ is based on utility-caused wildfire ignition risk and limited to only locations with existing PacifiCorp assets. Areas within the service territory but without PacifiCorp equipment are currently not identified as high-risk regardless of the risk at that location. Consistent with OAR 860-300-0020 requirements, PacifiCorp will develop and employ a new HFRZ methodology; the new HFRZ methodology will evaluate wildfire risk across PacifiCorp's service territory, taking into consideration vegetation, topography, and climatology among other factors. This will include areas where PacifiCorp does not currently have assets, decoupling the geographic assessment of wildfire risk from the utility asset-specific planning models.

An HFRZ based on underlying weather, environmental, and geographical risk factors complies with OAR 860-300-0020 requirements and provides a foundational assessment of wildfire risk to inform mitigation planning independent of the current location of utility assets. This supports consideration of wildfire risk in new construction design and an alternative risk assessment to compare to asset-based risk model results using FireSight outputs.

Consistent with OAR 860-300-0030(2), to the extent practicable, PacifiCorp will confer with appropriate state agencies regarding proposed changes to the HFRZ.

4.8.2 Model Validation and Verification

Tracking ID: OR-RA-05

PacifiCorp's wildfire modeling vendor, Technosylva, currently validates the underlying FireSight model; however, the derived risk scores do not have an automated validation and verification module.

In 2026, PacifiCorp will implement a verification module that will track model changes from version to version and report the extent of such changes upon the initiation of a pull request. PacifiCorp will also automate standard validation checks for each model release.

The verification tests will provide a list of changes observed in the model outputs between versions. This is useful for developers who need to understand the impact of their intended changes to ensure the updated model continues to provide actionable results.

4.8.3 Climate Change Planning Model Component

Tracking ID: OR-RA-06, OR-IE-02

PacifiCorp currently has not implemented a strategy to adjust circuit segment risk scores based on projected climate change impacts.

PacifiCorp participated in the three-year Electric Power Research Institute (EPRI) Climate Resilience and Adaptation Initiative (READi) and is actively working with Argonne National Laboratory Center for Resilience and Decision Science to assess climate change impacts within its service territory. In 2027, PacifiCorp will evaluate the outcomes of this engagement and adjust its model output appropriately. PacifiCorp expects this analysis to describe climate change impacts to extreme fire weather and seasonal average weather conditions in Oregon. These insights can then be evaluated for future inclusion in long-term wildfire risk planning models to identify circuits that will show increased risk and that can be prioritized for future grid hardening projects.

4.8.4 Third-Party Review of Models

Tracking ID: OR-RA-07

Industry best practices for utility wildfire risk analysis and mitigation planning models are still rapidly evolving with a variety of approaches that must reflect unique utility circumstances. Upon completion of its next risk model major update in 2026, PacifiCorp will engage with third-party consultants to review and evaluate its current modeling strategy compared to industry best practices, alternative risk analyses including state and federal risk modeling, and historical wildfire occurrences where available and appropriate. This improvement will identify strengths and weaknesses within the model framework and potential opportunities for future model enhancements.

4.8.5 Portfolio Optimization

Tracking ID: OR-RA-09

PacifiCorp's Planning Model 2 has a mitigation selection framework; however, this logic is expected to mature beyond its initial stages, described in Section 4.2.4. Coincident with the Company's continued efforts to define its risk reduction strategy, the logic for optimizing risk mitigation selections will evolve to accommodate increasingly complex decision criteria. This optimization will consider parameters such as risk reduction, cost, program efficacy, annual construction targets, and budget constraints.

The mitigation optimization framework will provide model-based mitigation recommendations that can be used by scoping engineers to plan grid hardening projects. The mitigation decisions will be adjustable to accommodate different constraints, such as budgets, annual construction target changes, or others.

5. Wildfire Mitigation Strategy Development

5.1 Overview

As described in Section 2, PacifiCorp's primary wildfire mitigation goal is to reduce the likelihood and impact of wildfire ignitions associated with utility infrastructure, with a focus on safeguarding communities. Broadly, PacifiCorp's wildfire mitigation strategy portfolio consists of five pillars: (1) long-term risk modeling, (2) system strengthening and resilience, (3) situational awareness, (4) operational practices, and (3) engagement. These pillars generally align with the foundational components pioneered by utilities with longer WMP histories in fire-prone regions.[6] A discussion of the five pillars and how they provide interlocking risk coverage can be found in Sections 1 and 2. PacifiCorp sets objectives and deploys specific programs within the five pillars according to its wildfire risk and regulatory requirements.

In this section, the Company discusses

- the core components of its strategy development processes,
- how it evaluates new wildfire mitigation programs or significant changes to existing programs,
- its use of long-term risk modeling and risk spend efficiency (RSE) calculations to guide key mitigation strategies, and
- its plans to evolve its strategy development process and measure results.

5.1.1 Steady Strategy Deployment in a Rapidly Maturing Sector

Since 2021, wildfire mitigation planning in Oregon has evolved rapidly, and PacifiCorp is advancing its risk modeling and strategy development processes to continuously enhance this essential work. The methodologies described in Sections 4 and 5 are a snapshot of the Company's latest progress in risk modeling and strategy development. It is important to note that for system hardening work in particular, there can be a lag between these mitigation planning developments and their impacts on the ground. As the Company discusses in Section 5.2.2.2, risk and RSE modeling serves as a foundation for PacifiCorp's system hardening strategy development, but additional optimization occurs thereafter over the course of implementing specific mitigation projects. For the Company to achieve timely, consistent progress deploying system hardening projects, it follows through on projects that are

[6] PG&E. Wildfire Mitigation Plans.
SDG&E Wildfire Mitigation Plan.
Southern California Edison. Wildfire Mitigation Plans.

already in the implementation process even though they were scoped and prioritized using a legacy modeling approach.

Several factors drive PacifiCorp to deploy timely and consistent mitigations while continuing to refine its risk-based modeling and WMP strategy development processes:

1. The rise in destructive wildfires and potentially severe consequences for utilities and their customers in the West drives the Company to make timely progress mitigating risks.
2. In addition to posing threats to human health, livelihoods, and the environment, utility-associated destructive wildfires can cause cascading effects that threaten the health and functionality of utilities.[7] Through timely wildfire mitigation work, the Company is addressing the concerns of customers in an atmosphere of higher perceived risk.
3. PacifiCorp has a large HFRZ, and portions of it lie in areas that are logistically difficult and costly to conduct system upgrades. Additionally, large portions of PacifiCorp's territory and HFRZ are rural, which means the Company has considerable infrastructure to monitor and maintain relative to the number of customers in the area. To effectively address utility-associated wildfire risk in its territory in a timely manner, the Company strives to make consistent and incremental progress at system hardening work.
4. The Company's HFRZ and riskiest circuit segments illustrate its best assessment of where the highest risks are on its system. This is distinct from a zone or list of circuits that encapsulate all the Company's wildfire risk. It is better to think of the HFRZ and riskiest circuits segments as the highest-priority items to address, rather than the only risks that need to be addressed. So even as the Company refines its risk modeling, potentially altering its HFRZ and/or riskiest circuit segments ranking, this should not necessarily devalue work being done in areas that may no longer be considered within the HFRZ or the top riskiest circuits in the future.

[7] Barlow, J., Powell, D., Kincaid, J., Abernethy-Cannella, K., & Boff, D. (2025). Wildfire Risk: Review of Utility Industry Trends. PNNL-SA-211619. Wildfire Risk Review of Utility Industry Trends_PNNL_July 2025.pdf.

5.2 Framework

5.2.1 Evaluating New Mitigation Programs or Expansions to Existing Ones

When PacifiCorp considers new wildfire mitigation programs or expansions to existing ones, the process begins with a structured intake evaluation. Proposals may be submitted through an intake form, presented at a Wildfire Risk Governance Committee (WRGC) meeting, or elevated through other executive-level reviews. Each proposal follows a standardized template designed to provide consistent, data-driven evaluation and clear presentation for decision-making. This template includes:

- **Program Summary and Objectives:** Defines the scope, estimated costs, and objectives, such as reducing wildfire likelihood, mitigating consequences, or minimizing PSPS impacts.
- **Cost-Benefit Analysis:** Outlines anticipated investment by program area and compares benefits realized through pilots or similar programs at other utilities.
- **Effectiveness Evaluation:** Provides a clear, data-supported statement of program effectiveness, ideally quantified by state and tied to outcomes such as reduced outages or improved system resilience.
- **Lessons Learned:** Summarizes insights from internal monitoring, cross-utility collaboration, and regulatory feedback, including any changes implemented or proposed based on these findings.
- **Peer Benchmarking:** Compares program design and eligibility criteria with other utilities (for example Pacific Gas & Electric (PG&E), Southern California Edison (SCE), San Diego Gas & Electric (SDG&E)) to identify best practices and gaps.
- **Program Update Recommendations:** Suggests adjustments such as eligibility refinements, scope changes, or expansions, supported by rationale and cost implications.
- **Timeline and Decision Points:** Establishes milestones for effectiveness calculations, program updates, and integration into PacifiCorp's WMP.

This process emphasizes clarity, regulatory alignment, and data-backed decisions while allowing flexibility for program-specific details. Submissions are reviewed for alignment with PacifiCorp's wildfire mitigation portfolio objectives. For smaller, repeatable tasks such as weather station installations or fuse replacements, proposals may be grouped by operating district or state to streamline tracking and reporting.

Evaluation focuses on how well each proposal supports wildfire mitigation objectives, the clarity of its scope, anticipated benefits, and cost-effectiveness. PacifiCorp also identifies and evaluates new strategies by examining industry practices and technologies, collaborating with other utilities, and comparing multiple options to achieve the best balance of risk reduction, cost, reliability, and regulatory compliance. When information is limited, pilot programs may be conducted before broader implementation, and a full summary of current pilots is provided in Section 5.6.

Role of the Wildfire Risk Governance Committee

The Wildfire Risk Governance Committee (WRGC) provides cross-functional oversight to maintain alignment and accountability across PacifiCorp's wildfire mitigation strategy. By bringing together leaders from engineering, operations, regulatory, risk management, and community engagement, the committee addresses two key questions: (1) Is this work wildfire mitigation, and (2) how should it be prioritized and scheduled to deliver the greatest risk reduction? This structured review process allows for discussion and review of ignition risk reduction, regulatory compliance, and cost-effectiveness while identifying overlaps, gaps, and dependencies between programs. The result is stronger governance, efficient resource allocation, and transparency that builds confidence that every dollar spent contributes meaningfully to reducing wildfire risk and protecting communities.

The WRGC is generally composed of senior leaders and advisors with diverse expertise and decision-making authority. Table 5-1 gives an example roster.

Table 5-1: Wildfire Risk Governance Committee Example Member Roster

Position	Committee Role
SVP, Power Delivery	Executive Sponsor
Managing Director, Delivery Assurance	Voting Member
VP, System Operations	Voting Member

Position	Committee Role
VP, Asset Management	Voting Member
VP, Engineering and T&D Standards	Voting Member
Assistant General Counsel	Voting Member
VP, Rocky Mountain Power Operations	Voting Member
VP, Project Delivery	Voting Member
VP, Pacific Power Operations	Voting Member
VP, Wildfire Mitigation and Emergency Management	Voting Member
Managing Director, Asset Risk and Performance	Advisor
Director, Meteorology	Advisor
Manager, Data Science	Advisor
Director, Emergency Management	Advisor
Director, Wildfire Mitigation Program Delivery	Advisor
Director, Real-Time Engineering	Advisor
Managing Director, T&D Grid Innovation and Strategy	Advisor
Director, Asset Management	Advisor
Directors, Wildfire Mitigation Program Delivery	Advisor
Director, Rocky Mountain Power Regulation	Advisor
Director, Pacific Power Regulation	Advisor
Senior Attorney	Advisor

5.2.2 Use of Long-term Risk Modeling

PacifiCorp's long-term risk and RSE modeling produces three strategy development tools:

1. Delineation of an HFRZ
2. A ranking of circuit segments according to wildfire risk
3. Monetized RSE analyses of line rebuild options for the riskiest circuit segments

As discussed in Sections 7 and 8, the Company uses the HFRZ to apply enhanced asset inspection and vegetation management protocols to higher-risk areas. The Company also uses the HFRZ to prioritize dispersed system hardening equipment, such as system automation devices, to support operational practices as discussed in Sections 6 and 10.

The Company uses the second and third strategy development tools to inform capital-intensive system hardening projects, including line rebuilds. A line rebuild for a high-risk circuit segment typically involves replacing bare overhead conductor with covered conductor, undergrounding overhead line, or a mixture of these mitigations over the circuit segment. PacifiCorp prioritized advancing its strategy development process for line rebuilds at this stage of WMP maturity because the work has particularly significant long-term implications to mitigate long-term wildfire risk. The Company's line rebuild strategy entails a six-phase process, which is described in the following subsection.

5.2.2.2 Prioritizing and Optimizing Line Rebuild Projects

PacifiCorp prioritizes and optimizes line rebuild projects according to the six-phase process depicted in Figure 5-1.

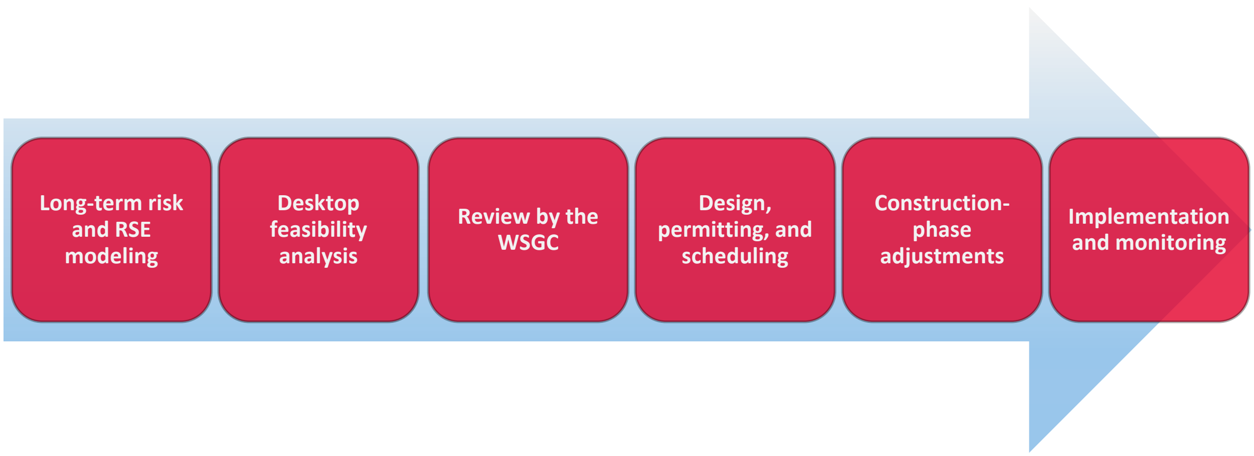
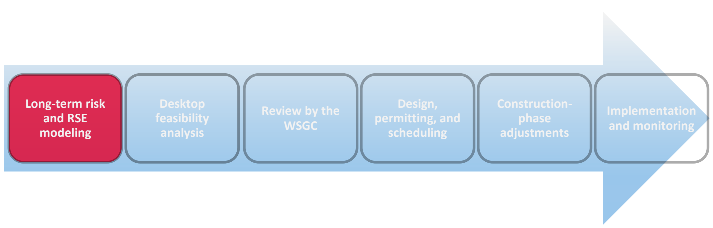


Figure 5-1: Line Rebuild Strategy Process

1. Long-term Risk and RSE Modeling



PacifiCorp calculates long-term risk and RSE modeling for system hardening projects according to the methodologies described in Sections 4.2.3 and 4.2.4. The outputs of these analyses, which are provided in Section 4.6, provide a ranking of the riskiest circuit segments and monetized RSE calculations for line rebuild options. The modeling also provides an initial, baseline assessment of which mitigation is recommended based on RSE calculations.

Altogether, the long-term risk and RSE modeling tools provide an initial sequence for line rebuild projects and assessment of which mitigation strategy to deploy. However, line rebuild work presents numerous and substantive project-specific considerations beyond what long-term modeling covers using statewide assumptions and estimates, and the Company continues to optimize line rebuild project scope, sequencing, and design during the ensuing phases.

PacifiCorp is continuously developing its risk and RSE modeling as described in Section 4, which can cause changes in the modeling outputs. When updated modeling affects the prioritization or mitigation recommendation of circuits with work already in progress, the Company will generally continue with projects that are already in design or later phases to avoid duplicating substantial investments in design and permitting. PacifiCorp aims to make steady, incremental progress in mitigating wildfire risk, and this requires planning and implementing mitigation work using the best available information, even as the Company continues to refine its long-term risk and RSE modeling. See Section 5.1.1 for additional discussion of PacifiCorp's approach to producing steady progress amidst rapid development in the wildfire mitigation sector.

Factors Considered After the Long-Term Risk and RSE Modeling

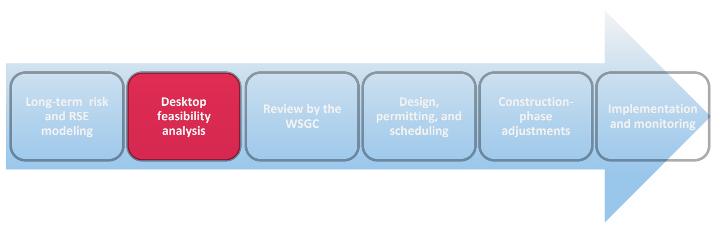
Table 5-2 describes several factors for line rebuilds that the Company considers beyond what is captured in long-term risk and RSE modeling. In the following subsections, the Company discusses how these factors can result in changes to line rebuild project scope, sequencing, sizing, and design.

Table 5-2: Factors Considered Beyond Long-term Risk and RSE Modeling

Factor	Description
Accessibility	Accessibility refers to the ability to get to and operate within the construction site. This can include considerations of transportation routes, traffic control, equipment access, and the ability to mobilize labor and materials efficiently.
Constructability	Constructability is the degree to which a project design can be easily and cost-effectively built. It takes into account the construction methods, available materials, labor, and the overall feasibility

Factor	Description
	of turning a design into a functioning utility system. If a design is not constructible, it could lead to delays or cost overruns.
Customer and Community Impacts	Utility infrastructure choices can impact customers and communities in various ways. For instance, re-routing lines can negatively impact future development plans or create new opportunities.
Environmental Impact	Environmental impact refers to the effects that construction has on the surrounding ecosystem and environmental remediation requirements post-construction. This includes air and water quality, noise, wildlife habitats, soil erosion, and potential pollution risks. Certain environments, such as wetlands, pose differential and sometimes substantially greater challenges to construction.
Geotechnical Factors	Geotechnical factors involve the study of groundwater, soil, and rock properties that affect the feasibility project designs.
Logistical and Operational Efficiency	Logistical and operational efficiency refers to the ability to manage the movement, storage, and use of materials, equipment, and construction crews so that the right resources are in the right place at the right time, supporting continuous workflow and minimizing idle time, rework, and costs. It can also refer to anticipating the logistical and operational efficiency of the grid infrastructure once completed, and designing utility infrastructure accordingly.
Permitting Dynamics	Permitting dynamics refers to the regulatory and legal processes involved in obtaining the necessary approvals, licenses, and permits to begin and complete construction.
Topographical Factors	Topographical factors include the terrain gradient, contours, and stability, and can be examined at broad or granular scales.

2. Desktop Feasibility Analysis



The desktop feasibility analysis reviews line rebuild work on a project-by-project basis and draws upon an intermediate level of detail relative to later phases. Additional project-specific details beyond what is captured in risk and RSE modeling are collected, assessed, and used to optimize the scope and prioritization of line rebuild projects. One objective of this phase is to generate additional project-specific information and analysis for the Wildfire Scope Governance Committee (WSGC) to review before the Company begins committing substantial resources to a project.

The desktop feasibility analysis typically involves an initial, high-level assessment of project accessibility, potential environmental impacts, logistical and operational efficiency, permitting dynamics, and topographical factors. Below, the Company discusses some ways in which these factors can impact project sequencing, design, and sizing at this phase.

Impacts to Project Sequencing

The long-term risk and RSE modeling provides an initial sequencing for line rebuild work as it provides a ranking of the riskiest circuit segments, and the Company seeks to mitigate the highest-ranked risks first. However, several factors examined during the desktop feasibility phase could impact that initial sequencing. For example, the Company examines what permits will likely be required for projects and assesses the complexity and time needed to obtain them, which may lead to re-sequencing. If a large number of complex permits from multiple agencies will be needed for a project, the Company may assume a longer period will be required to acquire the requisite permits and re-sequence the project to create that time.

The Company may also re-sequence projects to align diverse utility work and optimize logistical and operational efficiency. Where possible, the Company seeks to work on adjacent or co-located circuits concurrently, align line rebuild projects with other utility work in the same or nearby locations, or even align with other utilities, such as telecommunications providers, to capitalize on the opportunity to share costs at a joint location. These re-sequencing efforts seek to balance addressing the highest-risk circuit segments first and conducting utility operations in a feasible and cost-conscious manner. These efforts to optimize sequencing continue through the next two phases.

Impacts to Project Design

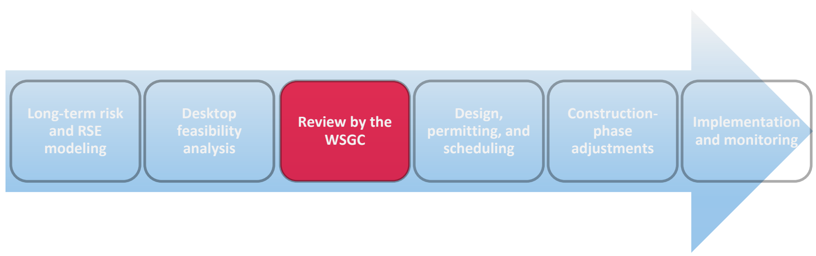
All the factors listed in Table 5-2 could potentially impact line rebuild design feasibility and design choice. For instance, undergrounding line on steep, rocky, or unstable terrain may be inadvisable due to the specialized equipment needed and the ability to safely operate the equipment in the terrain, driving the Company to consider covered conductor or other alternatives instead. Similarly, it may be clear at this stage that a large portion of a project runs through or near a wetland, which is likely to pose additional environmental impacts, permitting requirements, feasibility challenges, and costs for specific mitigation options, driving the Company to consider alternatives. Although more granular terrain issues and design specifics are primarily scrutinized at later phases, it is possible that the

Company would make adjustments based on broader feasibility issues with the mitigation option recommended by the long-term risk and RSE modeling at this stage.

Impacts to Project Sizing

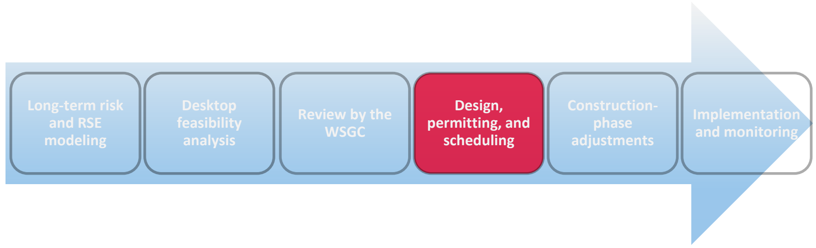
The long-term risk modeling applies a blanket approach to circuit segmentation using momentary ZOPs, as described in Section 4.2.3. When planning and designing actual mitigation projects, the Company considers whether to adjust the specific bounds of the segments delineated in long-term modeling to optimize risk reduction, feasibility, system operability, and service reliability. Again, factors listed in Table 5-2 could impact project sizing—if not at this phase, then in ensuing phases.

3. Review by the Wildfire Scoping Governance Committee



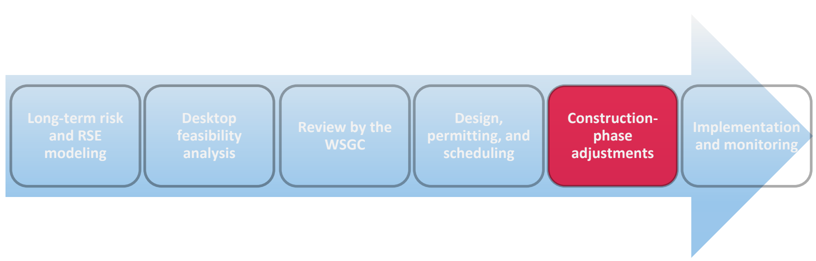
After proposed projects have gone through the initial desktop feasibility analysis, they undergo a review process overseen by the WSGC. The WSGC brings together experts and operational leaders from across the Company to review line rebuild projects for feasibility, risk reduction, budgeting, and compatibility with Company construction standards. Each project is evaluated, and the WSGC authorizes those projects deemed appropriate to proceed to detailed scoping, engineering design, and construction. Particular consideration is given to projects that extend beyond the HFRZ and to any significant changes in project priority or sequencing. Only approved projects move into the next phase.

4. Design, Permitting, and Scheduling



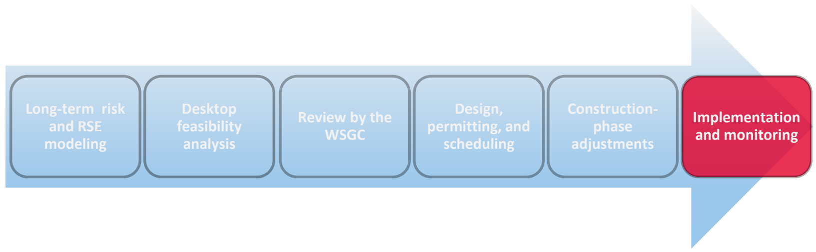
During this phase, the Company makes substantial investments in projects, including coordinating with property owners, customers, communities, and other utilities, such as telecommunications providers; developing detailed project designs; pursuing permits; provisioning and staging materials and scheduling labor for construction; and broadly allocating Company resources for projects. Responding to issues that arise as the Company completes the aforementioned tasks could cause it to make course adjustments that affect project scope, scheduling, sequencing, design, and sizing. While pursuing permits, it may become clear that scope or sizing changes would make projects more feasible, or that more or less time will be needed to acquire permits and that the project should be re-sequenced. Detailed construction designs or on-the-ground site surveys may provide more granular geotechnical or vegetation information that could affect project design. The Company may coordinate with property owners and customers about re-routing lines and adjust its designs accordingly. Similarly, the Company may need to adjust course based on its ability to maintain or acquire rights-of-way. Significant adjustments to projects may spur an additional round of review by the WSGC.

5. Construction-phase Adjustments



Issues encountered at the construction site, such as sub-surface rock or utility lines, could impact construction methods and project attributes. Where possible or when necessary, the Company is responsive to requests made by property owners and customers at this phase that enhance project feasibility and efficiency.

6. Implementation and Monitoring



After construction is complete and infrastructure is integrated into the Company's electrical grid system, monitoring of the mitigation for mitigation effectiveness analyses begins. This is described further in Section 5.2.3.

5.2.3 Wildfire Mitigation Strategy Development – Performance Monitoring

5.2.3.1 Performance Monitoring

Performance monitoring is the structured process of measuring, analyzing, and reporting progress toward defined objectives. It focuses on tracking key performance indicators to evaluate:

1. Effectiveness, and
2. Progress on targets.

By providing timely insights, performance monitoring supports informed decision-making and continuous improvement throughout the implementation cycle.

5.2.3.2 Performance Monitoring: Effectiveness

PacifiCorp began its preliminary evaluation of grid resiliency programs, specifically, covered conductor installations and undergrounding, using the Wildfire Mitigation Plan Effectiveness Guidelines approved by the WRGC. The goal was to understand how these mitigations perform against wildfire risk. For this first round of analysis, the Company focused on outage data tied to ignition risk drivers such as wire down events, faults, and vegetation-related contacts. Each outage record was examined for details, including the date, circuit, cause category, location, and other key metrics.

Because these programs span multiple years and often start as pilots, it takes time to identify the right data attributes and gather enough information for meaningful evaluation. Few mitigations have mature datasets, and in some cases, proving statistical significance could take decades. For now, PacifiCorp relies on qualitative reviews with SMEs rather than formal normalization methods. Future evaluations will incorporate systematic adjustments for weather and system changes to ensure comparability over time.

Effectiveness is measured against the core objectives of the wildfire mitigation portfolio: reducing wildfire likelihood and consequence, reducing the likelihood and scope of ESS or PSPS events, and general wildfire mitigation maturity progression. External factors such as weather and fuel conditions can influence wildfire frequency, so PacifiCorp focuses on what it can control: the ignition risk drivers. Historical outage records are mapped to potential ignition risks associated with operating equipment. Mitigations may not eliminate these risks entirely, but they aim to significantly reduce their frequency. For example, vegetation contact risk is addressed through multiple programs because there is no single solution. If mitigations work as intended, ignition risk drivers should decline over time, which may eventually reduce utility-caused wildfire ignitions. However, this lagging indicator can be misleading due to factors outside the Company's control, such as drought or changes in fuel management near rights-of-way.

Vegetation management illustrates this complexity. Removing overhanging vegetation reduces risk, but branches can still pose hazards during wind events. Covered conductor complements vegetation management, creating a layered approach that delivers greater benefit. This principle applies broadly: wildfire mitigation is not about one action but about combining tools to address multiple risk drivers. This concept is illustrated in Figure 5-2.

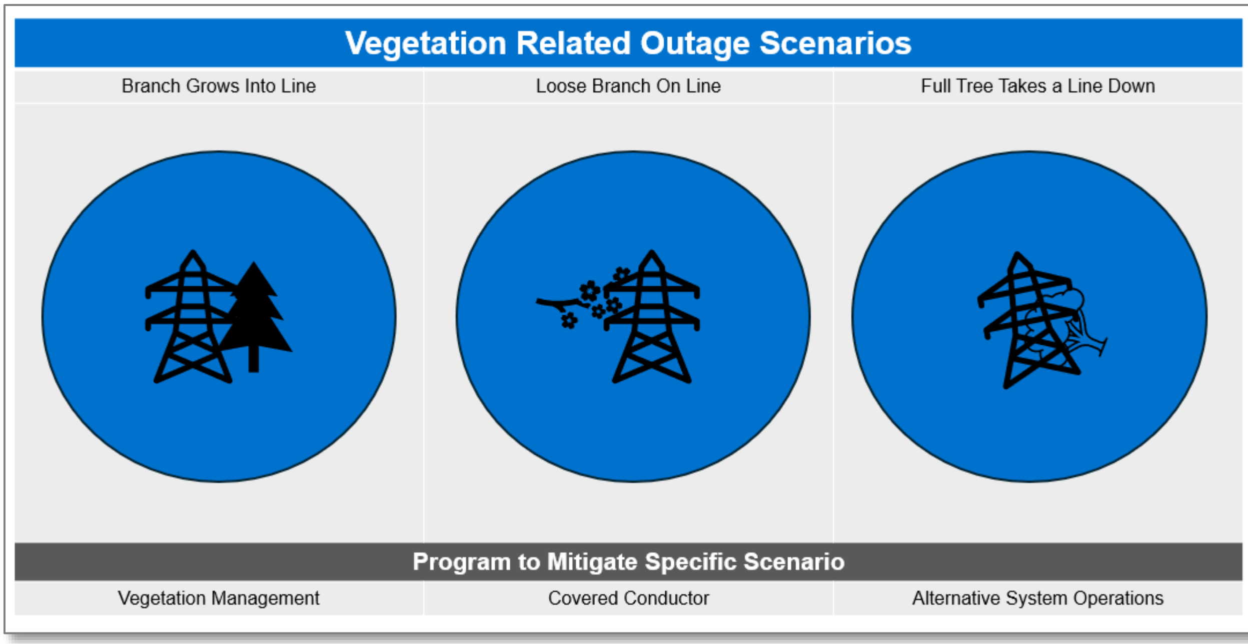


Figure 5-2: Vegetation-Related Outages Scenarios

Across the industry, utilities are grappling with how best to measure program effectiveness. There is no single favored approach, and the landscape is evolving. One promising method involves grouping metrics and evaluating similar programs to compare relative effectiveness and align cost-benefit decisions. PacifiCorp organizes its evaluations into three areas: reducing wildfire likelihood, reducing wildfire consequence, and reducing ESS and PSPS impacts with a variety of metrics.

Whenever possible, PacifiCorp evaluates individual mitigation applications. When isolation is not feasible, such as with broadly applied vegetation management, the Company documents other mitigations in place and their completion dates. Confounding variables such as weather, system changes, or ESS can influence results, so normalization methods are being explored.

5.2.3.3 Performance Monitoring: Progress on Targets

PacifiCorp already has a foundation for monitoring performance with the monthly business results process, where key targets are reported for executive and SME visibility. This existing framework is leveraged as a tool to track progress on critical wildfire mitigation initiatives. For example, the Company can monitor metrics such as line miles of covered conductor completed and the number of expulsion fuses replaced. By integrating these into the regular reporting cadence, the Company creates transparency and keeps leadership informed.

5.2.4 Wildfire Mitigation Strategy Development – Other

PacifiCorp discusses its risk models and how it uses them to inform wildfire mitigation strategy and decision-making, not just in Section 5, but throughout the WMP. Table 5-3 identifies the risk model(s) that support strategic decision-making for each of the items in OAR 860-300-0030(d) and provides locations where the items themselves are discussed in the WMP.

Table 5-3: Locations of Risk Model Descriptions and Applications

OAR Item	Risk Model	Narrative
(A) Public Safety Power Shutoffs	Near-term Model (Section 9.2.6)	Section 12
(B) Vegetation Management	Long-term Model (Sections 4.2.1 and 4.2.2)	Sections 5.2.1.2 and 8
(C) System Hardening	Long-term Model (Section 4.2)	Sections 5.2.1.2, 5.2.1.3, and 6
(D) Investment Decisions	Long-term (Sections 4)	Section 5 and Appendix E
(E) Operational Decisions	Near-term Model (9.2.6) and Long-term Model (Sections 4.2.1 and 4.2.2)	Sections 5.2.1.2, 7, and 10

5.3 Results

5.3.1 Results of the Effectiveness Study for Covered Conductor and Undergrounding

PacifiCorp evaluated the effectiveness of covered conductor and undergrounding projects using the Wildfire Mitigation Plan Effectiveness Guidelines. The study compared outage counts before and after mitigation on circuits where the majority of the line was rebuilt under the grid hardening program. The analysis focused on outages associated with ignition risk.

By systematically mapping outage data to risk event categories, PacifiCorp was able to identify reductions in ignition-related events following the installation of covered conductor and undergrounding. These measured effectiveness values were documented and presented to the WRGC for review and approval. Once approved, the results were reviewed with SMEs to inform estimated effectiveness values, aligned with how California IOUs incorporate data reviews into the effectiveness values selected by SMEs.

5.3.1.1 Covered Conductor

Covered conductor demonstrated benefits in reducing certain outage types, particularly those caused by animal contact and vegetation. These improvements reflect the insulating properties and durability of the covered conductor material. Effectiveness against tree-related outages was more limited where large limbs were present, and covered conductor showed only modest improvements of effectiveness against vehicle contact with equipment (e.g., car hit pole) showed only modest improvement. Overall, the results indicate that covered conductor is a strong mitigation for specific risk drivers but does not eliminate all outage causes.

5.3.1.2 Undergrounding

Undergrounding showed positive results in reducing outages linked to several ignition risk drivers, including animal contact, vegetation, contamination, and pole fires. However, some outages persisted due to secondary overhead segments that were not part of the undergrounding scope. While the data set was smaller, the findings provide initial insight that undergrounding is a high-impact mitigation for wildfire risk reduction, though it is not a complete solution.

5.3.2 Key Insights and Next Steps

Both mitigations indicated improvements, but opportunities remain for refinement, and the results are not statistically significant. Residual outages highlight the need for complementary strategies such as secondary overhead mitigation evaluation and enhanced monitoring tools. PacifiCorp will continue to supply these results to SMEs to validate assumptions and refine cost-effectiveness estimates. Ongoing monitoring and data quality improvements will support ensuring that future evaluations are consistent, auditable, and actionable.

5.4 Initiatives and Targets

In this section, PacifiCorp presents its initiatives and targets for the 2026–2028 WMP cycle.

5.4.1 Initiative Summary Table

In Table OPUC 5-1 PacifiCorp presents its 2026–2028 initiatives and targets in Wildfire Mitigation Strategy Development, which are described further below.

Table OPUC 5-1: Wildfire Mitigation Strategy Development Initiative Cost Summary in Thousands[8]

Initiative Activity	Tracking ID	Target Unit	2026 Target	2026 Forecast ($1,000)	2027 Target	2027 Forecast ($1,000)	2028 Target	2028 Forecast ($1,000)	Three-Year Total ($1,000)	Section Number
Wildfire Mitigation Plan Development and Delivery	OR-WS-01	Qualitative	Development and filing of 2027 WMP Update and 2026 results	[redacted]	Development and filing of 2028 WMP Update and	[redacted]	Development and filing of 2029-2031 WMP and 2028 results	[redacted]	[redacted]	5.4.2
Measured Effectiveness	OR-WS-02	Qualitative	Continued mitigation effectiveness assessments.	[redacted]	Continued mitigation effectiveness assessments.	[redacted]	Continued mitigation effectiveness assessments.	[redacted]	[redacted]	5.3.1, 5.4.4
Grant Study	OR-WS-03	Qualitative	Continue identifying grant opportunities	[redacted]	Continue identifying grant opportunities	[redacted]	Continue identifying grant opportunities	[redacted]	[redacted]	2.2.1, 5.4.5
Automation of WMP Data Collection	OR-ES-03	Qualitative	Automate data collection for Oregon data templates Begin automation for tracking of WMP initiatives, targets and metrics	[redacted]	Continue automation data collection for Oregon data templates Continue automation for tracking of WMP initiatives, targets and metrics	[redacted]	Complete automation of data collection for Oregon data templates Complete automation for tracking of WMP initiatives, targets and metrics	[redacted]	[redacted]	5.4.3, 5.5, 9.5.6

[8] All initiative forecasts and three-year totals include capital cost and operations and maintenance expenses.

5.4.2 Wildfire Mitigation Plan Development and Delivery

Tracking ID: OR-WS-01

The 2026–2028 WMP includes costs for the Wildfire Program Delivery team. This team is responsible for developing the WMP, including coordinating with PacifiCorp's internal departments such as asset risk, asset management, vegetation management, field operations, meteorology, and emergency management to develop the plan, initiatives, and targets. The Wildfire Program Delivery team is responsible for ensuring the elements of the plan meet the regulatory requirements, in accordance with OAR 860-300-0020. The team is also responsible for ensuring that all aspects of the plan are delivered and that results are reported to the OPUC, consistent with filing requirements.

5.4.3 Automation of WMP Data Collection

Tracking ID: OR-ES-03

In the 2026–2028 WMP cycle, PacifiCorp will automate collecting data used in the Oregon data template filing to ensure consistent repeatable processes into the Foundry platform. The Company will also begin automation to track WMP initiatives, targets, and metrics to ensure consistency in reporting and tracking results. Costs in Table OPUC 5-1 include costs for weather forecasting initiatives described in Section 9.5.

5.4.4 Measured Effectiveness

Tracking ID: OR-WS-02

In Section 5.3, PacifiCorp describes results of its effectiveness study for covered conductor (tree wire and spacer cable) and undergrounding. Mitigation effectiveness assessments that will utilize the Company's growing body of data and feedback about its wildfire mitigation work will continue in the 2026–2028 WMP cycle. The results of this work may be used to inform the Company's RSE calculations subject to data availability and statistical confidence in the results.

5.4.5 Grant Study

Tracking ID: OR-WS-03

As described in Section 2.2.1, PacifiCorp has received grants to create a safer, more resilient and reliable grid for its customers in the most cost-efficient way possible. PacifiCorp continues to identify and apply for grant opportunities, with customers receiving the benefits of the projects and programs and as a net impact on rates after OPUC approval of the AAC.

5.5 Continuous Improvement

PacifiCorp is improving its wildfire mitigation strategy by refining risk models, strengthening internal processes, and incorporating lessons learned from reviews and stakeholder feedback. Program enhancements are informed by benchmarking against industry best practices and insights gained through internal evaluations. These efforts also include improving data reporting and compliance processes to meet regulatory requirements and ensure transparency in mitigation effectiveness.

The Company's long-term risk modeling provides essential strategy development tools, including the HFRZ, ranking of riskiest circuits, and monetized RSE analyses of mitigation options. These tools support the targeted deployment of a wide array of wildfire mitigation work. As discussed in Sections 4.7 and 4.8, PacifiCorp has numerous initiatives to enhance its long-term risk modeling in the 2026–2028 timeframe. These initiatives will make the strategy development tools more robust and inclusive of additional factors relevant to wildfire risk assessment and mitigation RSE calculations. As the Company's long-term risk modeling evolves and improves, its strategy development processes will also evolve and improve.

Furthermore, as discussed in Sections 5.3 and 5.4, the Company is engaged in mitigation effectiveness assessments that will utilize the Company's growing body of data and feedback about its wildfire mitigation work. The results of this work may be used to inform the Company's RSE calculations, subject to data availability and statistical confidence in the results.

Automation of data collected for WMP reporting, including the Oregon data templates filed and the WMP, will ensure consistency in how data is collected, reported, and tracked. This supports improved monitoring of progress on initiative targets during the year and supports the ability to take earlier action to help an initiative get back on track to meet targets.

5.6 Pilot Technology Summary

In Table OPUC 5-2 below are a summary of three pilots PacifiCorp is undergoing.

Table OPUC 5-2: Pilot Technology Summary

Pilot / Initiative Name: Early Fault Detection (EFD)	**Tracking ID:** OR-SA-02
Details	Objectives of the pilot are to evaluate a novel distributed sensing and analytics platform that has the potential to detect and localize emergent defects in electrical equipment. PacifiCorp is in the process of baselining information from the EFD system and developing systems and procedures for data analysis and field inspections. Please see Section 6.2.3 for additional information.
Goals	Learning objectives from the pilot are to assess the technological maturity of the hardware and analytics platform, the accuracy of reported data, and the potential effectiveness of a scaled program to reduce wildfire ignition risks. Field inspections are also incorporating the use of handheld acoustic partial discharge cameras to confirm and localize emission sources. Pairing these two complementary technologies during the pilot will assist in developing additional guidance for field inspections.
Status	Field installations for the pilot completed in 2024. Installation of field hardware is functionally complete. The pilot is currently in an evaluation phase focused on evaluation of telemetered data, inspection of field alerts, and maintenance of field sensors.
Current penetration / saturation	19 of 20 planned EFD sensors, monitoring approximately 60 circuit miles of 69 kV sub-transmission between the Cave Junction Substation in Oregon and the Happy Camp, Seiad, Hamburg and Scott Bar Substations in California.
Application	Early detection, inspection, and corrective measures taken at the installation locations have the potential to prevent faults and associated ignition risks.
Milestones	Q4/2024: Field installations completed, sensing platform online and active Q1/2025: Field inspection Phase 1 (baseline) Q3/2025: Field inspection Phase 2 Q4/2025: Internal stakeholder update Q2/2026: Field Inspection Phase 3 Q4/2026: Internal stakeholder update Q2/2027: Field Inspection Phase 3 Q3/2027: Project closeout and internal stakeholder update
Forecast Capital ($1,000)	[redacted]
Forecast O&M ($1,000)	[redacted]
Actual Capital (as of Q3 2025) ($1,000)	[redacted]

Actual O&M (as of Q3 2025 ($1,000)	[redacted]
Implementation Timeframe	2024-2027
Pilot Lifespan	2024-2027
Pilot / Initiative Name:	Enhanced Infrared Inspections on Distribution Lines **Tracking ID:** OR-AI-08
Details	The distribution infrared inspection is a multiyear pilot inspection program. The infrared inspections will be performed simultaneously with the drone inspection pilot OR-AI-10. The inspections follow the detailed inspection schedule offset by three years. The drone inspection will be performed two years prior to the next scheduled detailed inspection. Please see Section 7.2.1.5 for more information.
Goals	The goal is to identify through infrared inspection potentially unique conditions that were not identifiable through drone imagery performed.
Status	Pilot inspections will begin in 2026.
Current penetration / saturation	Pilot area is distribution assets interconnected with the HFRZ.
Application	Application is for distribution asset inspections.
Milestones	2026: 16,285 facility points inspected 2027: 13,200 facility points inspected 2028: 19,252 facility points inspected
Forecast Capital ($1,000)	[redacted]
Forecast O&M ($1,000)	[redacted]
Actual Capital (as of Q3 2025) ($1,000)	[redacted]
Actual O&M (as of Q3 2025) ($1,000)	[redacted]
Implementation Timeframe	2026-2028
Pilot Lifespan	2026-2028
Pilot / Initiative Name:	Distribution Drone Inspections **Tracking ID:** OR-AI-10
Details	The drone inspections will be performed as a pilot inspection for all of PacifiCorp's distribution assets that are interconnected with the HFRZ. The inspections follow the detailed inspection schedule offset by three years. The drone inspection will be performed two years prior to the next scheduled detailed inspection. Please see Section 7.2.1.7 for more information.
Goals	Identify if drone inspections find more or different conditions than detailed ground inspections.
Status	Pilot inspections will begin in 2026.
Current penetration / saturation	Pilot area is distribution assets interconnected with the HFRZ.
Application	Application is for distribution asset inspections.
Milestones	2026: 16,285 facility points inspected

	2027: 13,200 facility points inspected 2028: 19,252 facility points inspected
Forecast Capital ($1,000)	[redacted]
Forecast O&M ($1,000)	
Actual Capital (as of Q3 2025) ($1,000)	
Actual O&M (as of Q3 2025) ($1,000)	
Implementation Timeframe	2026-2028
Pilot Lifespan	2026-2028

6. GRID DESIGN AND SYSTEM HARDENING

6.1 Overview

Grid design and system hardening is a key component of system strengthening and resilience. These targeted investments are essential to constructing, maintaining, and operating a safe, reliable, and adaptive system that can handle current and future risks. In this section, the Company discusses how it is designing its system to reduce overall wildfire risk.

6.2 Mitigations

In this section, PacifiCorp describes the grid design and system hardening mitigations performed to strengthen the system. These measures include installing covered conductor such as tree wire and spacer cable and more resilient poles to support the new covered conductor. Other measures include installing system automation equipment such as relays and reclosers to sectionalize the system to enable ESS during times of elevated fire risk and target ESS to minimize the number of customers impacted. System automation equipment such as CFCIs and other fault detection devices supports faster identification of a fault to ensure that the response can happen more quickly. The Company described mitigations below in more detail.

6.2.1 Covered Conductor Installation (Tree Wire)

Tracking ID: OR-GH-01

Overview of the activity: Historically, most medium-voltage power lines in the United States were installed with bare overhead conductor. As the name "bare" suggests, the wire surface is uninsulated and exposed to the elements. For purposes of wildfire mitigation, a new covered conductor design has emerged as an industry best practice, with some variations in products. Covered conductor is also called tree wire or aerial cable. Most of the projects in the line rebuild program will involve the installation of insulated covered conductor. Covered conductor is manufactured with a high-impact-resistant extruded exterior, forming an insulation around stranded hard-drawn conductor. Covered conductor is not insulated enough for direct handling of an energized high-voltage power line; rather, the insulation layers effectively reduce the risk of wildfire by minimizing the vegetation or ground contact compared to bare conductor.

Variations in covered conductor products have been used in the industry for decades. Due to many operating constraints, use of covered conductor tended to be limited to locations with extremely dense vegetation where traditional vegetation management was not feasible or efficient. Recent technological developments have improved covered conductor products, reducing the operating constraints historically associated with the design. These advances have improved the durability of the project and reduced the impact of conductor thermal constraints. There are still logistical challenges with covered conductor: for example, the wire is heavier, especially during heavy snow/ice loading, meaning that more and/or stronger poles may be required to support covered conductor.

Impact of the activity on wildfire risk: PacifiCorp has estimated the effectiveness of covered conductor, including tree wire, as a wildfire risk mitigation at 65%. As described in Section 4.2.3, the estimated effectiveness will vary based on the type of risk.

Impact of the activity on outage (ESS, PSPS) program risk: PacifiCorp has not quantified the estimated effectiveness of this mitigation on outage risk.

6.2.2 Distribution Pole Replacements and Reinforcements

Tracking ID: OR-GH-02, OR-GH-15

Overview of the activity: Traditionally, overhead distribution poles are replaced or reinforced within the service territory consistent with the National Electric Safety Code (NESC), PacifiCorp policies, and prudent utility practices. When a pole is identified for replacement, typically through routine inspections and testing, after major weather events, or as part of joint-use accommodation projects, a new pole suitable for the intended use and design is installed in its place. Engineering specifications typically reflect the use of wooden poles, which are considered safe and structurally sufficient to support overhead electrical facilities during standard operating conditions.

Alternative non-wooden construction, such as steel, can provide additional structural resilience in high-risk locations during wildfire events. In addition to installing non-wooden solutions as part of standard replacement programs or mechanisms in priority locations with increased risk, wooden poles might also be replaced during covered conductor installation as they may not be strong enough to accommodate the additional weight of the covered conductor.

Depending on the pole configuration and location, the Company might also install a fire-resistant wrap around both transmission and distribution wooden poles in areas of heightened wildfire risk. The wrap is applied to protect the poles from fire damage in the event of a wildfire but is not a structural reinforcement. PacifiCorp targets poles for fire wrap in locations where the risk of the maximum flame height falls in the 95th percentile of five feet, based on long-term risk model outputs. These locations are reviewed with local management to determine priorities based on feeder construction (radial or loop systems), critical customers, and potential access issues.

Impact of the activity on wildfire program risk: PacifiCorp has not quantified the estimated effectiveness of this mitigation activity on wildfire risk.

Impact of the activity on outage (ESS, PSPS) program risk: PacifiCorp has not quantified the estimated effectiveness of this mitigation on outage risk.

6.2.3 Emerging Grid Technology Installations and Pilots

Tracking ID: OR-SA-02

Overview of the activity: One emerging grid technology uses early fault detection (EFD) sensors, which detect high-frequency radio frequency (RF) emissions coupled to transmission lines. The locations of these RF sources are calculated as a distance from measurement points using precise global positioning system (GPS) timing, and potential correlations with Company assets are assessed by analyzing RF pulse intensity and occurrence patterns. In the frequency spectrum, monitored RF sources correlated to electrical equipment may be indicative of partial discharge activity related to the localized breakdown of insulators or other electrical equipment. Early detection, inspection, and corrective measures taken at these locations have the potential to prevent faults and associated ignition risks. Data and alerts from the platform are monitored by engineers, and high-detection sites are flagged for off-cycle inspection.

Site selection for the pilot prioritized a contiguous sub-transmission segment with HFRZ classifications, with additional metrics targeting difficult-to-patrol line segments with geographic and terrain-based obstacles.

Impact of the activity on wildfire program risk: PacifiCorp has not quantified the estimated effectiveness of this mitigation activity on wildfire risk.

Impact of the activity on outage (ESS, PSPS) program risk: PacifiCorp has not quantified the estimated effectiveness of this mitigation on outage risk.

6.2.4 Installation of System Automation Equipment

Tracking ID: OR-GH-04

Overview of the activity: Installation of system automation equipment involves the replacement and upgrade of electromechanical relays, reclosers, circuit breakers, and other protection and control devices, with modern microprocessor-based systems. These upgrades enhance the Company's ability to detect and isolate faults quickly, reducing the duration and magnitude of fault events, which lowers the risk of ignition and wildfire occurrence. System automation provides advanced functionality, such as faster response times, greater customization through programmable settings, and the ability to execute complex logic tailored to environmental conditions, particularly during periods of elevated wildfire risk.

PacifiCorp also installs Fusesavers, which are lightweight, pole-mounted devices that can very quickly interrupt faults and are used to protect overhead branch circuits. Fusesavers can be installed to sectionalize circuits so that devices upstream of the Fusesaver can be removed from ESS.

Improving the grid and ESS protocols involves replacing old electromechanical protection devices with new microprocessor-based devices. Protection device installations follow the high-level process outlined in Figure 6-1 below.

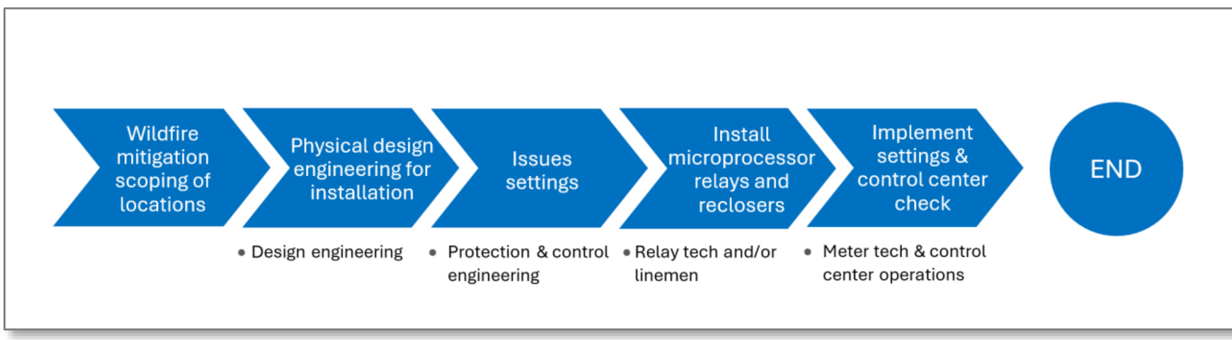


Figure 6-1: Protection Device Installation Process

By improving fault detection, isolation, and restoration capabilities, system automation supports the objectives of mitigating wildfire risks, enhancing grid reliability, and reducing service disruptions. The program also targets improved operational efficiency and safety by integrating advanced technology that reduces manual interventions and supports faster restoration times after outages.

Additionally, the activity impacts the likelihood and consequence of ignitions. For example, faster fault isolation reduces the duration and magnitude of fault energy, which in turn minimizes ignition potential.

Customizable settings allow for more refined operations during high-risk periods, further reducing the probability of ignition and enhancing safety in wildfire-prone regions.

Impact of the activity on wildfire program risk: PacifiCorp has not quantified the estimated effectiveness of this mitigation activity on wildfire risk.

Impact of the activity on outage (ESS, PSPS) program risk: PacifiCorp has not quantified the estimated effectiveness of this mitigation on outage risk.

6.2.5 Installation of System Monitoring Equipment (such as CFCI)

Tracking ID: OR-SA-02, OR-SA-07, OR-SA-08

Overview of the activity: Below, PacifiCorp describes the system monitoring equipment that the Company installs to support grid monitoring, as described in Section 9.2.3.

Communicating fault current indicators (CFCIs) are conductor-mounted sensors with embedded communications modules that monitor conductor current and electric field intensity and alarm on the detection of fault currents and loss of electric field-associated system outages. CFCI sensor fault event triggers are used to locate zone-based faults; their root mean square (RMS) fault current targets and oscillography records are used in fault locating with model-based short-circuit analysis. Oscillography records also provide the ability to assess protective device coordination.

CFCI installation sites are selected based on criteria in *Engineering Handbook Section 2D.5—Faulted Circuit Indicator Placement*. Circuit getaways with downstream HFRZ classifications are prioritized in site selection. Other metrics are also incorporated to ensure site compatibility with specific technologies, including cellular signal strength and construction type. Additional locations on circuits may be considered to facilitate zone-based fault locating, terrain, and other site-specific issues. Figure 6-2 shows the circuits where CFCIs are installed through the third quarter of 2025.

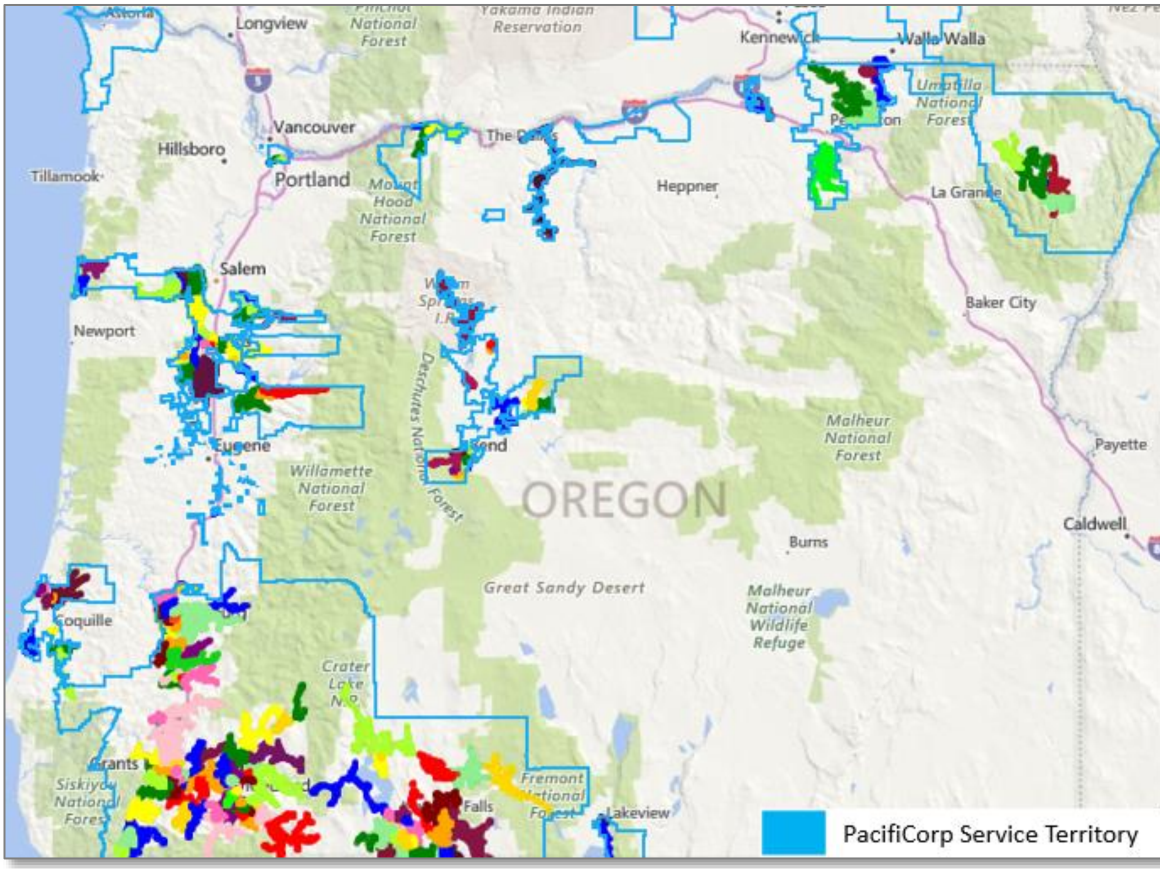


Figure 6-2: Location of Circuits with CFCI Installations through the End of the Third Quarter of 2025

Circuit breaker/recloser monitoring: PacifiCorp's substation control advanced network (SCAN) automatically retrieves and archives enriched event data from protective relays. The data collected includes sequence of event logs and common format for transient data exchange (COMTRADE) event files associated with breaker operations, overcurrent faults, and high-impedance faults. Files and logs collected by the system are generally available to control center engineers within a few minutes of an event occurring, enabling in-depth analysis including classification of fault types, fault magnitudes, and probable locations determined through analysis with impedance models. The data also can be used to assess performance of protective settings and provide early indication of high-impedance faults.

The Company is currently developing formal site selection criteria and prioritization criteria. Initial efforts have focused on distribution field reclosers with downstream HFRZ classifications. Other metrics are also incorporated to ensure site compatibility with specific technologies, including cellular signal strength, recloser types, and the presence of an existing Supervisory Control and Data Acquisition (SCADA) connection. Additional considerations related to distance from service center locations, frequency of device operation, downstream customer count/type and line miles, and availability of field/engineering resources to complete settings review and field installations are also considered.

Impact of the activity on wildfire program risk: PacifiCorp has not quantified the estimated effectiveness of this mitigation activity on wildfire risk.

Impact of the activity on outage (ESS, PSPS) program risk: PacifiCorp has not quantified the estimated effectiveness of this mitigation on outage risk.

6.2.6 Microgrids

Tracking ID: OR-GH-12

Overview of the activity: PacifiCorp performed feasibility studies for implementing utility interactive and islanded microgrid solutions at four remote sites, including three in California and one in Utah. The studies evaluated loading seasonality potential for onsite generation with photovoltaic and wind resources, evaluated energy storage, and identified potential energy deficits requiring the use of propane, natural gas, or diesel generators. Results from the studies and unit pricing are under evaluation and may be incorporated into future evaluation matrices.

Impact of the activity on wildfire risk: N/A

Impact of the activity on outage (ESS, PSPS) program risk: N/A

6.2.7 Other Grid Topology Improvements to Minimize Risk of Ignitions

Overview of the activity: At the time of this filing, PacifiCorp does not have programs for other grid topology improvements to minimize the risk of ignitions.

Impact of the activity on wildfire risk: N/A

Impact of the activity on outage (ESS, PSPS) program risk: N/A

6.2.8 Other Grid Topology Improvements to Mitigate or Reduce PSPS Events

Overview of the activity: At the time of this filing, PacifiCorp does not have programs for other grid topology improvements to minimize PSPS events.

Impact of the activity on wildfire risk: N/A

Impact of the activity on outage (ESS, PSPS) program risk: N/A

6.2.9 Spacer Cable Installation

Tracking ID: OR-GH-01

Overview of the activity: Spacer cable installation is a system hardening and reliability improvement measure involving the replacement or modification of conventional open-wire distribution systems with compact, covered conductor systems supported by spacers. The design uses a messenger cable that provides mechanical support for the phase conductors, which are insulated and arranged in close proximity using interphase spacers. The use of spacer cable helps reduce the potential for conductor-to-conductor contact and vegetation interference, and enhances electrical system resiliency during high wind and severe weather conditions. Utilities typically install spacer cable in locations with dense vegetation, elevated wildfire risk, narrow or constrained rights-of-way, or chronic reliability issues where traditional overhead construction underperforms and undergrounding is impractical or cost-prohibitive. The decision to install this technology is contingent on results stemming from wildfire risk modeling metrics, historical outage data, field inspections, and the engineering feasibility of the proposed project.

Impact of the activity on wildfire risk: PacifiCorp has estimated the effectiveness of covered conductor, including spacer cable, as a mitigation at 65%. As described in Section 4.2.3, the estimated effectiveness will vary based on the type of risk.

Impact of the activity on outage (ESS, PSPS) program risk: PacifiCorp has not quantified the estimated effectiveness of this mitigation on outage risk.

6.2.10 Traditional Overhead Hardening

Tracking ID: OR-GH-17

Overview of the activity: Traditional overhead system hardening involves strengthening existing infrastructure to improve resilience against environmental, mechanical, and electrical stresses that contribute to wildfire ignition and service interruption risks. This activity generally includes replacing and reinforcing poles, crossarms, insulators, and associated hardware with high-strength, fire-resistant, and longer-lasting materials. Traditional overhead hardening is a mitigation typically performed by PacifiCorp on overhead transmission lines.

Typical measures under traditional overhead hardening include

- Replacing support structures (poles) based on age or strength criteria
- Installing larger crossarms and insulators rated for higher voltage
- Increasing phase spacing to reduce contact risk
- Installing enhanced hardware and grounding to improve system stability and fault performance

Traditional overhead hardening can mitigate wildfire risk by reducing the likelihood of equipment failure or ignition under stress conditions such as high winds, vegetation contact, or pole failure. Selected replacement of poles and crossarms lowers the probability of structural failures, and updated materials and higher design loads increase resistance to wind and debris impacts. Upgraded insulators and increased phase spacing limit arcing from contact with vegetation or wildlife, while hardened components maintain performance standards for longer periods.

Traditional overhead hardening also improves system reliability and reduces outage risk, enhancing grid performance and safety. Hardened infrastructure is less likely to fail during storms, while stronger materials result in lower failure frequency for poles, crossarms, and insulators. Improved conductor spacing and resilient components can reduce vegetation and wildlife-related faults.

Impact of the activity on wildfire program risk: PacifiCorp has not quantified the estimated effectiveness of this mitigation activity on wildfire risk.

Impact of the activity on outage (ESS, PSPS) program risk: PacifiCorp has not quantified the estimated effectiveness of this mitigation on outage risk.

6.2.11 Transmission Pole Replacements and Reinforcements

Tracking ID: OR-GH-03, OR-GH-15

Overview of the activity: Traditionally, overhead transmission poles are replaced or reinforced within the service territory consistent with the NESC, PacifiCorp policies, and prudent utility practices. When a pole is identified for replacement, typically through routine inspections and testing, after major weather events, or as part of joint-use accommodation projects, a new pole suitable for the intended use and design is installed in its place. Engineering specifications typically reflect the use of wooden poles, as they are considered safe and structurally sufficient to support overhead electrical facilities during standard operating conditions.

Depending on the pole configuration and location, the Company may also install a fire-resistant mesh wrap around both transmission and distribution wooden poles in areas of heightened wildfire risk. The wrap is applied to protect the poles from fire damage in the event of a wildfire. Pole wraps may also be applied as an interim solution on poles scoped for replacement with steel poles.

PacifiCorp has also included the pole replacement program with the line rebuild installations as an efficient use of resources. That being said, exclusively poles and transmission structures replaced under the line rebuild program are counted in the WMP. In some cases, poles need to be replaced to accommodate the additional weight of covered conductor. Replacing wooden poles with stronger non-wooden solutions such as fiberglass or steel increases grid resiliency and eliminates the need to return later. This approach also ensures that pole replacements are prioritized effectively.

PacifiCorp plans to mitigate the risk associated with wooden poles and structures by working to replace them with fire-resilient materials on a case-by-case basis. Pole replacement and reinforcement reduce wildfire risk by enhancing the structural integrity and resilience of the electrical distribution system. These activities also ensure that poles can support the additional weight of covered conductors and other wildfire mitigation equipment, which further minimizes the risk of sparks or electrical faults that could lead to wildfires. Together, pole replacements and reinforcements play an important role in improving system resilience and protecting vulnerable areas from wildfire events.

Impact of the activity on wildfire program risk: PacifiCorp has not quantified the estimated effectiveness of this mitigation activity on wildfire risk.

Impact of the activity on outage (ESS, PSPS) program risk: PacifiCorp has not quantified the estimated effectiveness of this mitigation on outage risk.

6.2.12 Undergrounding of Electric Lines and/or Equipment

Tracking ID: OR-GH-16

Overview of the activity: Under the line rebuild program, PacifiCorp is also considering undergrounding. While an underground design does not eliminate every ignition potential (i.e., because of above-ground junctions), it is considered the most effective strategy for reducing the risk of any utility-related ignition. Unfortunately, the cost of underground construction often makes it difficult to apply widely. Therefore, the Company evaluates the potential to convert overhead lines to underground lines for rebuild projects on a project-by-project basis. Through the design process, each project is assessed to determine whether sections of the rebuild should be completed with underground construction.

Impact of the activity on wildfire risk: PacifiCorp has estimated the effectiveness of undergrounding distribution as a mitigation at 98%. Please see Section 4.2.3 for discussion of estimating effectiveness of this mitigation.

Impact of the activity on outage (ESS, PSPS) program risk: PacifiCorp has not quantified the estimated effectiveness of this mitigation on outage risk.

6.2.13 Grid Design and System Hardening – Performance Monitoring

Tracking ID: N/A

Overview of the activity:: As described in Section 5.3, the Company has established processes to measure the effectiveness of grid design and system hardening mitigations beginning with covered conductor (tree wire and spacer cable) and undergrounding. In Section 5.5, the Company describes its initiative to continue building processes to measure effectiveness of these mitigations.

Impact of the activity on wildfire risk: N/A

Impact of the activity on outage program risk:. N/A

6.2.14 Grid Design and System Hardening – Other

Tracking ID: OR-GH-05

Overview of the activity: PacifiCorp is proactively replacing expulsion fuses in high fire risk areas as part of a project to install new and approved non-expulsion fuses, including power fuses and current-limiting fuses, to replace existing expulsion fuse equipment. Replacements are planned to align with the line rebuilding program where feasible to optimize resource use and efficiency. Expedited replacement of expulsion fuses is prioritized for lines where covered conductor installations are planned but where the covered conductor installations are scheduled to occur more than 12 months in the future. Fuse replacements include lines located inside the HFRZ and those outside the HFRZ that are necessary for coordination on the circuit. Additionally, fuse replacements will encompass lines in high fire risk areas that are not part of the current line rebuild plans. Should PacifiCorp establish new high fire risk areas or identify additional areas requiring mitigation through enhanced fire detection and monitoring systems, the scope of this program may be adjusted or expanded in future implementation cycles.

This activity mitigates the risk of equipment failure associated with expulsion fuses by replacing them with upgraded, fire-resistant alternatives. The upgraded fuses are designed to prevent sparks and reduce the likelihood of ignition during fault conditions, particularly in high fire risk areas.

This activity directly impacts the likelihood and consequence of ignitions by addressing a key risk driver: the potential for sparks generated by expulsion fuses during fault events. By replacing these fuses, the likelihood of an ignition caused by equipment failure is significantly reduced. Furthermore, the consequence of an ignition is minimized due to the improved performance of upgraded fuses, which are less likely to produce sparks even under fault conditions. Together, these efforts strengthen wildfire mitigation strategies, enhance system resilience, and create safer operational practices in vulnerable areas.

PacifiCorp evaluates the hardened status of upstream circuits, segments, and spans to determine how the replacement of fuses impacts reliability risk. This evaluation considers the condition and design of upstream infrastructure to ensure the improvements achieved through fuse replacement are not offset by vulnerabilities in adjacent system components.

This activity impacts the likelihood and consequence of outage program events by reducing the occurrence of faults and interruptions caused by fuse failures. For example, areas currently subject to PSPS events may experience fewer outages as the upgraded fuses improve fault tolerance and reduce the likelihood of equipment-related risks triggering PSPS actions.

The activity also has a positive effect on overall reliability by decreasing the number of outages, shortening the duration of interruptions, and reducing the number of customers affected. Trend analysis of reliability data shows improvements over time in areas where fuse replacements have been implemented, with fewer fuse-related outages and faster restoration times. This demonstrates the effectiveness of the activity in mitigating outage risks and enhancing system performance in high-risk and high-priority areas.

Impact of the activity on wildfire program risk: PacifiCorp has not quantified the estimated effectiveness of this mitigation activity on wildfire risk.

Impact of the activity on outage (ESS, PSPS) program risk: PacifiCorp has not quantified the estimated effectiveness of this mitigation on outage risk.

6.2.15 Other Technologies and Systems Not Listed Above

Tracking ID: OR-GO-01

Overview of the activity: The ESS circuit hardening program includes identifying and prioritizing short-term mitigation projects for completion prior to the wildfire season to reduce wildfire risk and mitigate potential reliability impacts to customers. Examples of prioritized projects include upgrading cutouts, fuses, crossarms, and insulators; installing or replacing reclosers; implementing ESS settings on existing protective devices; and installing fault circuit indicators on ESS circuits. Circuits for the ESS circuit hardening program are selected based on the number of protective relay device-level (breaker, recloser, or Fusesaver) interruptions (outages) while in ESS settings.

Impact of the activity on wildfire program risk: PacifiCorp has not quantified the estimated effectiveness of this mitigation activity on wildfire risk.

Impact of the activity on outage (ESS, PSPS) program risk: PacifiCorp has not quantified the estimated effectiveness of this mitigation on outage risk.

6.2.16 Quality Assurance and Quality Control

6.2.16.1 Overview, Objectives and Targets

Table 6-1 below presents PacifiCorp's quality assurance (QA) and quality control (QC) program plan objectives for grid design and system hardening:

Table 6-1: Grid Design and System Hardening QA and QC Program Objectives

Initiative/Activity Being Audited	Activity (Tracking ID #)	Quality Program Type	Objective of the Quality Program
Line Rebuild	OR-GH-01	QA	Ensure that new construction meets applicable standards
Distribution Pole Replacement and Reinforcements	OR-GH-02	QA	Ensure that new construction meets applicable standards
Transmission Pole Replacement and Reinforcements	OR-GH-03	QA	Ensure that new construction meets applicable standards
Installation of System Automation Equipment	OR-GH-04	QA	Ensure that new construction meets applicable standards
Expulsion Fuse Replacement	OR-GH-05	QA	Ensure that new construction meets applicable standards
ESS Circuit Hardening	OR-GO-01	QA	Ensure that installation meets applicable standards

6.2.16.2 QA and QC Procedures

Grid Design and System Hardening

Initiatives: OR-GH-01, OR-GH-02, OR-GH-03, OR-GH-04, OR-GH-05

QA/QC Tracking ID: OR-GH-01, OR-GH-02, OR-GH-03, OR-GH-04, OR-GH-05

PacifiCorp inspects grid hardening projects using the detailed inspections procedures described in *Asset Management Policy 009 Detailed Inspections for T&D Lines*, Revision 14 dated January 1, 2025.

ESS System Hardening

Initiatives: OR-GO-01

QA/QC Tracking ID: OR-GO-01

PacifiCorp inspects grid hardening projects using the detailed inspections procedures described in PacifiCorp's *Asset Management Policy 009 Detailed Inspections for T&D Lines*, Revision 14 dated January 1, 2025.

6.2.16.3 Sampling Plan

Grid Design and System Hardening

Initiatives: OR-GH-01, OR-GH-02, OR-GH-03, OR-GH-04, OR-GH-05

Sampling Plan for Initiatives: OR-GH-01, OR-GH-02, OR-GH-03, OR-GH-04, OR-GH-05

PacifiCorp performs quality assurance on 100% of all grid hardening projects through post-construction inspections.

ESS System Hardening

Initiatives: GO-01

Sampling Plan for Initiatives: GO-01

PacifiCorp performs quality assurance on 100% of all grid hardening projects through post-construction inspections.

6.2.16.4 Pass Rate Calculation

Grid Design and System Hardening

Initiatives: OR-GH-01, OR-GH-02, OR-GH-03, OR-GH-04, OR-GH-05

Pass Rate Calculation for Initiatives: OR-GH-01, OR-GH-02, OR-GH-03, OR-GH-04, OR-GH-05

Requirement of 95%–100% pass rate for planned inspections and grid hardening audits. The pass rate is calculated as:

$$\text{Pass Rate}_{\text{Grid}} = \frac{\text{Work Locations} - \text{Work Locations with a Finding}}{\text{Total Number of Inspections Completed}} \text{ x } 100$$

ESS System Hardening

Initiatives: OR-GO-01

QA/QC Procedure for Initiatives: OR-GO-01

Requirement of 95%–100% pass rate for planned inspections and grid hardening audits. The pass rate is calculated as:

$$\text{Pass Rate}_{\text{ESS}} = \frac{\text{Work Locations} - \text{Work Locations with a Finding}}{\text{Total Number of Inspections Completed}} \text{ x } 100$$

6.2.16.5 Documentation of Findings

Grid Design and System Hardening

Initiative: OR-GH-01, OR-GH-02, OR-GH-03, OR-GH-04, OR-GH-05

Documentation of Findings for Initiatives: OR-GH-01, OR-GH-02, OR-GH-03, OR-GH-04, OR-GH-05

Findings on grid hardening are reported to the installation contractor for correction prior to closeout of the grid hardening project. The installation contractor reports on correction completions.

ESS System Hardening

Initiative: OR-GO-01

Documentation of Findings for Initiatives: OR-GO-01

Findings on grid hardening are reported to the installation contractor for correction prior to closeout of the grid hardening project. The installation contractor reported on correction completions.

6.3 Results

Results presented below are through the end of the third quarter of 2025.

6.3.1 Covered Conductor Installation (Tree Wire), Spacer Cable Installation, and Traditional Overhead Hardening

Tracking ID: OR-GH-01, OR-GH-17, OR-GH-16

PacifiCorp completed 148.4 miles of tree wire installation and 0.4 miles of transmission line rebuild, for a total of 148.8 miles, 82% of the annual target. Figure 6-3 shows the location of 2025 covered conductor and traditional overhead hardening circuits.

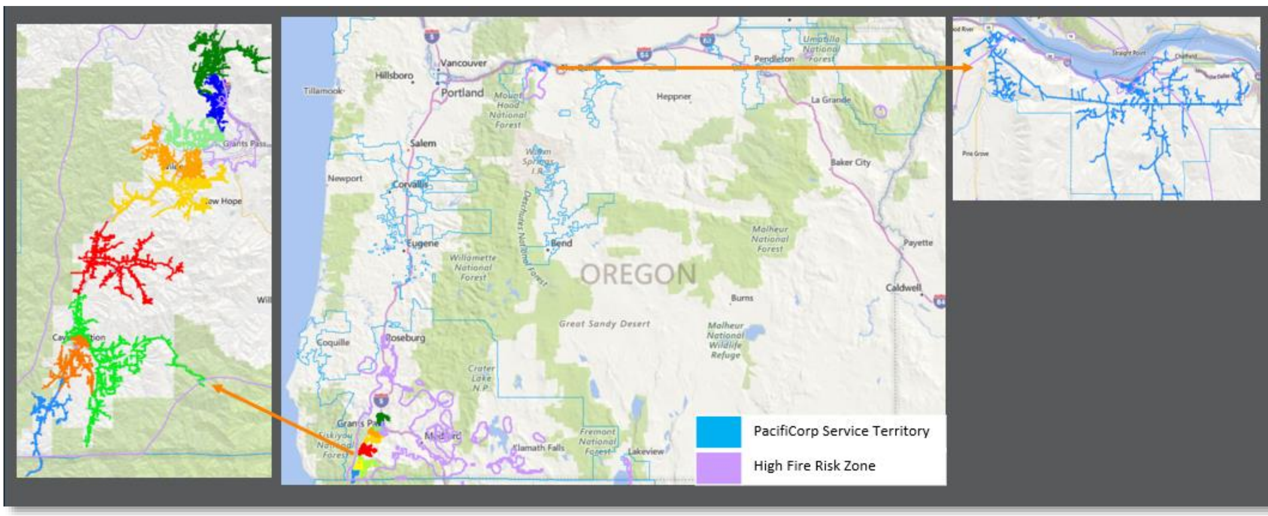


Figure 6-3: Location of Completed System Hardening through the End of the Third Quarter of 2025

6.3.2 Installation of System Automation Equipment

Tracking ID: OR-GH-04

PacifiCorp has completed installation of 62 relays and reclosers for distribution and transmission.

6.3.3 Installation of System Monitoring Equipment (such as CFCI)

Tracking ID: OR-SA-02, OR-SA-07

PacifiCorp has installed 733 CFCI devices through the end of the third quarter of 2025. As of the end of the third quarter, the Company has CFCI devices installed on 264 circuits.

PacifiCorp has installed 21 SCAN connected relays. Figure 6-4 shows the circuits where SCAN devices were installed in 2025.

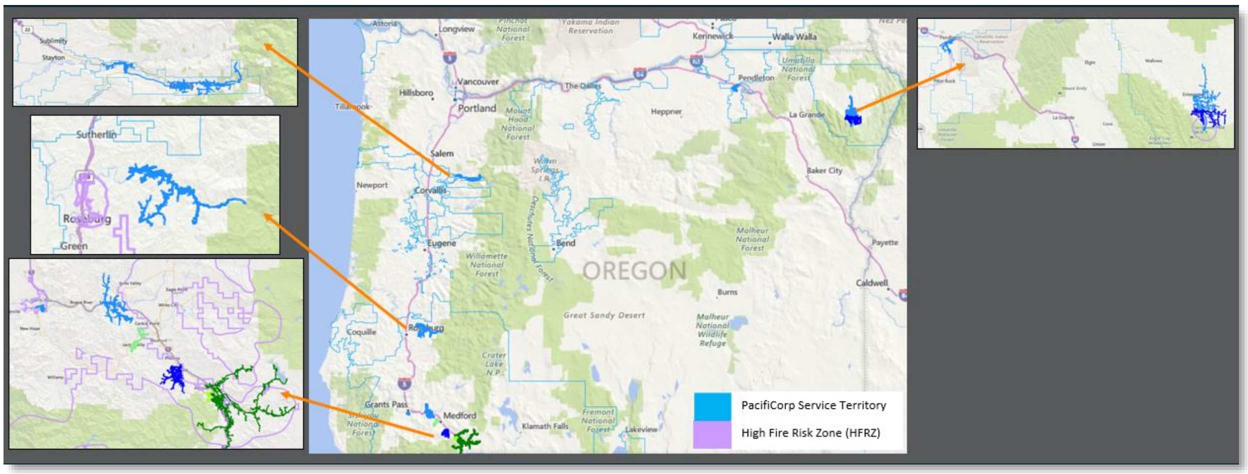


Figure 6-4: Location of SCAN Installations through the End of the Third Quarter of 2025

6.3.4 Emerging grid technology installations and pilots

Tracking ID: OR-SA-02

The Company has completed the installation of 19 of 20 planned EFD sensors, monitoring approximately 60-circuit miles of 69 kV sub-transmission between the Cave Junction Substation in Oregon and the Happy Camp, Seiad, Hamburg, and Scott Bar substations in California.

6.4 Initiatives and Targets

PacifiCorp's grid design and system hardening initiatives and targets for 2026–2028 are presented in Table OPUC 6-1 and discussed below.

6.4.1 Initiative Table Summary

Table OPUC 6-1: Grid Design and System Hardening Initiative Cost Summary in Thousands

Initiative Activity	Tracking ID	Target Unit	2026 Target	2026 Forecast ($1,000)	2027 Target	2027 Forecast ($1,000)	2028 Target	2028 Forecast ($1,000)	Three-Year Total ($1,000)	Section Number
System Hardening – Covered Conductor Installation (Tree Wire)	OR-GH-01	Line Miles	170	[redacted]	165	[redacted]	165	[redacted]	[redacted]	6.2.1, 6.4.2, 6.5
Distribution Pole Replacements	OR-GH-02	Poles	3,400	[redacted]	3,000	[redacted]	3,000	[redacted]	[redacted]	6.2.2, 6.4.2, 6.5
Transmission Pole Replacement	OR-GH-03	Poles	160	[redacted]	300	[redacted]	300	[redacted]	[redacted]	6.2.11
System Automation	OR-GH-04	Devices	68	[redacted]	68	[redacted]	68	[redacted]	[redacted]	6.2.4
Expulsion Fuse Replacement	OR-GH-05	Fuses	8,000	[redacted]	0	[redacted]	0	[redacted]	[redacted]	6.2.14
Distribution Pole Reinforcements: Pole Wrapping	OR-GH-15	Poles		[redacted]		[redacted]		[redacted]	[redacted]	6.2.2, 6.4
Undergrounding	OR-GH-16	Line Miles	2	[redacted]	0	[redacted]	0	[redacted]	[redacted]	6.2.12, 6.4.2, 6.5
Traditional Overhead Hardening – Transmission	OR-GH-17	Line Miles	8	[redacted]	15	[redacted]	15	[redacted]	[redacted]	6.2.10, 6.5
ESS Circuit Hardening	OR-GO-01	Circuits	15	[redacted]	15	[redacted]	15	[redacted]	[redacted]	6.2.15, 10.2
Line Sensor: Early Fault Detection (PILOT)	OR-SA-02	Qualitative	Q2/2026: Field Inspection phase 3 Q4/2026: Internal stakeholder update	[redacted]	Q2/2027: Field Inspection phase 3 Q3/2027: Project Closeout & Internal stakeholder update	[redacted]	N/A	[redacted]	[redacted]	5.6, 6.2.3
Distribution CFCI (Communicating Fault Circuit Indicators)	OR-SA-07	CFCI fleet health, percent-active devices reported annually	≥ 85%	[redacted]	≥ 90%	[redacted]	≥ 90%	[redacted]	[redacted]	6.2.5, 6.4, 6.5

Initiative Activity	Tracking ID	Target Unit	2026 Target	2026 Forecast ($1,000)	2027 Target	2027 Forecast ($1,000)	2028 Target	2028 Forecast ($1,000)	Three-Year Total ($1,000)	Section Number
SCAN (Substation Control Advanced Network)	OR-SA-08	Number of SCAN enabled protective relays	25	[redacted]	25	[redacted]	25	[redacted]	[redacted]	6.2.5
Distribution Protective Settings	OR-SA-09	Settings reviewed and issued	30	[redacted]	30	[redacted]	30	[redacted]	[redacted]	10.2.1

Costs for initiative GH-OR-02 are included OR-GH-01. Costs for initiative OR-GH-03 are included with OR-GH-17.

6.4.2 Covered Conductor Installation (Tree Wire), Traditional Overhead Hardening, and Undergrounding

Tracking ID: OR-GH-01, OR-GH-17, OR-GH-16

In 2026, PacifiCorp plans to install approximately 170 miles of tree wire, eight line miles of traditional overhead hardening, and two miles of undergrounding line to mitigate risk. In 2027–2028, the Company plans to install approximately 165 miles annually of tree wire and perform 15 miles of traditional overhead hardening. Figure 6-5 below shows the planned locations for line rebuild projects by year.

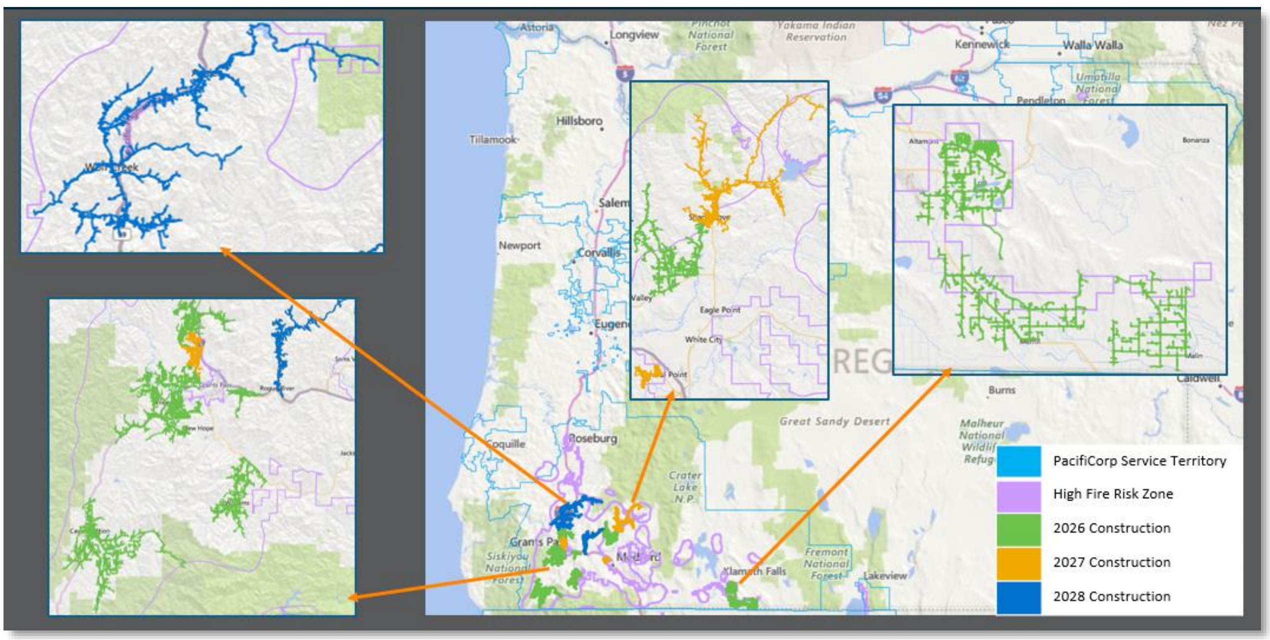


Figure 6-5: Circuits Identified for Hardening 2026–2028

6.4.3 Installation of System Automation Equipment

Tracking ID: OR-GH-04

PacifiCorp is forecasting the installation of relays and reclosers during each year of the 2026–2028 WMP cycle. One of the challenges to meeting the 2026–2028 targets is the increasing costs of fiber installation. Fiber is part of the device installation and is required to ensure the devices are communicating with the System Control Center for enabling ESS and communication of potential faults on circuits.

6.4.4 Pole Wrapping

Tracking ID: OR-GH-15

Based on the criteria described in Section 6.2.2 above, PacifiCorp will continue to install pole wrapping on a reactive basis in locations where the risk of the maximum flame height falls in the 95th percentile of five feet, based on long-term risk model outputs. These locations are reviewed with local management to determine priorities based on feeder construction (radial or loop systems), critical customers, and potential access issues.

6.4.5 ESS Circuit Hardening

Tracking ID: OR-GO-01

This initiative is focused on targeted short-term mitigation projects to support reducing the total number of outages and outage duration experienced on these circuits. Circuits selected for these targeted mitigations are based on the analysis of circuits impacted by ESS during the prior year's fire season, described in Section 10.2. PacifiCorp continues to target approximately seven circuits a year for these projects.

6.4.6 Installation of System Monitoring Equipment (such as CFCI)

Tracking ID: OR-SA-02

The focus on 2026–2028 for CFCI will be on fleet management and strategic site assessments. Total CFCI fleet size and/or sensor density is expected to go down as complementary system enhancements are deployed (e.g., upgrades to protective relays, improved settings coordination, expansion of SCADA, and SCAN).

Formal site selection and prioritization criteria for SCAN are under development. Initial efforts have focused on distribution field reclosers with downstream HFRZ classifications. Metrics are also incorporated to ensure site compatibility with specific technologies, including cellular signal strength, recloser types, and presence of an existing SCADA connection. Additional considerations related to distance from service center locations, frequency of device operation, downstream customer count/type and line miles, and availability of field/engineering resources to complete settings review and field installations are also considered.

6.5 Continuous Improvement

6.5.1 Covered Conductor Installation (Tree Wire), Traditional Overhead Hardening, and Undergrounding

Tracking ID: OR-GH-01, OR-GH-02, OR-GH-16

PacifiCorp has engaged a construction management firm to manage the detailed engineering and execution of line rebuild projects (tree wire, spacer cable, traditional overhead hardening, and undergrounding projects). This construction management firm can face financial consequences for underperformance if the design or construction does not meet Company standards. The construction management firm has managers and engineers in the field overseeing the construction and ensuring the work meets PacifiCorp standards. When work is complete, an independent party performs additional quality reviews. The engagement of the construction management firm ensures that PacifiCorp is able to execute on the line rebuilding projects to meet the annual commitments and reduce risk for customers and communities.

6.5.2 Traditional Overhead Hardening

Tracking ID: OR-GH-17

In 2025, PacifiCorp performed transmission hardening for transmission that was co-located with distribution that was hardened. In the 2026–2028 Plan, PacifiCorp will also harden transmission that is not co-located with distribution. The Company has hardened transmission in Utah and will use lessons learned from Utah to support successful project execution in Oregon.

6.5.3 Installation of System Monitoring Equipment (such as CFCI)

Tracking ID: OR-SA-02

PacifiCorp's engineering handbook section has been updated to formalize site selection and screening criteria for fault circuit indicator and CFCI placement.

7. Asset Inspections and Corrections

7.1 Overview

Table OPUC 7-1 below presents PacifiCorp's asset inspection frequencies and types.

Table OPUC 7-1: Asset Inspection Programs

Oregon Administrative Rule Inspection	OPUC Inspection Type	OPUC Frequency	Utility Program Name	Utility Program Details	Utility Program Frequency
OAR 860-024-0011(2)(c)	Safety Patrol Inspections	Every 2 years	Visual Assurance (VA) Inspection Program	Visual non-intrusive inspection of every overhead facility point each year	Yearly
OAR 860-024-0011(1)(A)(B)	Detailed Inspections	Every 10 years	Detail (DETAIL) Inspection Program -------- Pole Test & Treat (PTT) Inspection Program	Detail: Inspections involve visiting each structure and adjacent spans to visually identify potential nonconformance with NESC or other applicable state requirements, infringement by other utilities or individuals, defects, potential safety hazards, and facility deterioration that needs to be corrected to	Every 5 years (OH in HFRZ); 10 years (UG or outside HFRZ); main grid every 2 years

Oregon Administrative Rule Inspection	OPUC Inspection Type	OPUC Frequency	Utility Program Name	Utility Program Details	Utility Program Frequency
				maintain reliable and safe service. -------- PTT: Designed to identify decay, wear, or woodpecker damage, assess the condition of wood poles, and identify the need for any treatment, repair, or replacement	
OAR 860-024-0001 OAR 860-024-0018(3a)	Ignition Prevention Inspection (HFRZ Safety Patrol)	"Follow good utility practice as required to mitigate fire risk"	Included in VA, DETAIL, or PTT program cycles	Defined as an extra inspection above and beyond what the state requires	Defined as an extra inspection above and beyond what the state requires (see safety patrol and detail inspection frequencies above)

Table OPUC 7-2 below presents the asset correction types and timeframe.

Table OPUC 7-2: Asset Correction Types

Oregon Administrative Rule Correction	OPUC Finding	OPUC Corrective Timeframe	Utility Correction Type Name	Utility Type Details	Utility Corrective Timeframe
OAR 860-024-0012(1)	Imminent Danger	Corrected or made safe immediately	"I" Priority Conditions	Conditions found during a normal preventive maintenance inspection where it is deemed too dangerous for the inspector to leave	Corrected or made safe immediately
OAR 860-024-0012(2)	Conditions posing heightened risk of danger to life or property	2 years	All "A" Priority Conditions	Conditions posing heightened risk of danger to life or property	30 days
OAR 860-024-0012(3)(a)	Conditions posing little risk of danger to life or property	10 years	"B" Priority Conditions	"B" Priority Conditions outside of HFRZ or where Energy Release Risk (ERR)[9] = NO	2 years
OAR 860-024-0018(5)(a)(b)	Heightened risk of fire ignition (within the HFRZ)	180 days	"B" Priority Conditions	"B" Priority Conditions inside HFRZ and where ERR = YES	180 days

[9] Energy release risk (ERR) is defined in PacifiCorp's Procedure 069.

Oregon Administrative Rule Correction	OPUC Finding	OPUC Corrective Timeframe	Utility Correction Type Name	Utility Type Details	Utility Corrective Timeframe
OAR 860-024-0018	Imminent Danger	Corrected or made safe immediately	Occupant Violation Correction	Conditions found during a normal preventive maintenance inspection where it is deemed too dangerous for the inspector to leave	Corrected or made safe immediately
OAR 860-024-0018	Heightened risk of fire ignition (within the HFRZ)	180 days	Occupant Violation Correction	All other fire threat conditions (energy release risk) within the HFRZ	180 days

7.2 Mitigations

7.2.1 Asset Inspections

PacifiCorp maintains its system and assets consistent with OAR 860-024-0011 through a range of inspection and maintenance programs. These programs are tailored to identify conditions that could result in premature failure or potential fault scenarios, including situations in which the infrastructure may no longer meet code or engineered design or may become susceptible to external factors, such as weather conditions. Generally, these programs focus on inspection and correction of overhead and underground transmission and distribution facilities but also include substation facilities.

7.2.1.1 Overview

The inspection and correction programs described below are tailored to identify conditions that could result in a fault or failure. The inspections performed use a predetermined list of condition codes and priority levels to describe any noteworthy observations or potential noncompliance identified during the inspection. The process is designed to identify and correct conditions while reducing impact to normal operations.

In certain limited circumstances PacifiCorp may use temporary corrective actions or interim measures to decrease imminent threat conditions. The Company tracks such actions in its Facility Point

Inspection (FPI) system. If it is decided that temporary corrective actions or interim measures are to be implemented on an imminent threat condition, PacifiCorp captures the temporary or interim measure in the comments for the imminent condition. The condition is then removed from the system and entered into the system with the same condition code but a lower priority (B Priority) in compliance with OAR 860-024-0012 and OAR 860-024-0018.

PacifiCorp has processes in place to update associated procedures, inspection practices, and training materials to identify imminent threats. Generally, this review is performed annually to ensure compliance with national and state regulatory requirements, including National Electric Safety Code (NESC) requirements. In some instances, the policies and procedures may be updated if issues are identified during internal and external audit activities, if PacifiCorp policies change, or if improvements are discovered from implementation of the Company's existing programs.

PacifiCorp's Procedure 069 observes the attributes and inspector expectations associated with current condition codes. This document is updated at least annually and serves as a reference for inspectors, helping them align with Company standards—particularly when determining the appropriate priority level to assign. A key attribute observed is the energy release risk, which is shown as a YES/NO field. Under certain circumstances, this condition may correlate with an increased risk of fault events and potential energy release at the location in question.

7.2.1.2 Detailed (Non-Intrusive) Inspections

Overview

Tracking ID: OR-AI-03, OR-AI-04

PacifiCorp performs detailed (non-intrusive) inspections of transmission and distribution electric lines and equipment to maintain regulatory compliance with OAR 860-024-0011 and OAR 860-024-0018. These inspections involve visiting each structure and adjacent spans to visually identify potential nonconformance with NESC or other applicable state requirements, infringement by other utilities or individuals, defects, potential safety hazards, and facility deterioration that needs to be corrected to maintain reliable and safe service.

During an evaluation, an inspector documents potential violations and noteworthy observations—including potential risks—by assigning a condition code and priority level. The priority levels are set based on established Company policies; the condition codes are specifically designed to predetermine the potential of energy release risk as well as other types of conditions.

Detailed inspections involve multiple teams within PacifiCorp. Below in Figure 7-1 is a flow diagram that outlines the detailed (non-intrusive) inspection process, from initiation to completion.

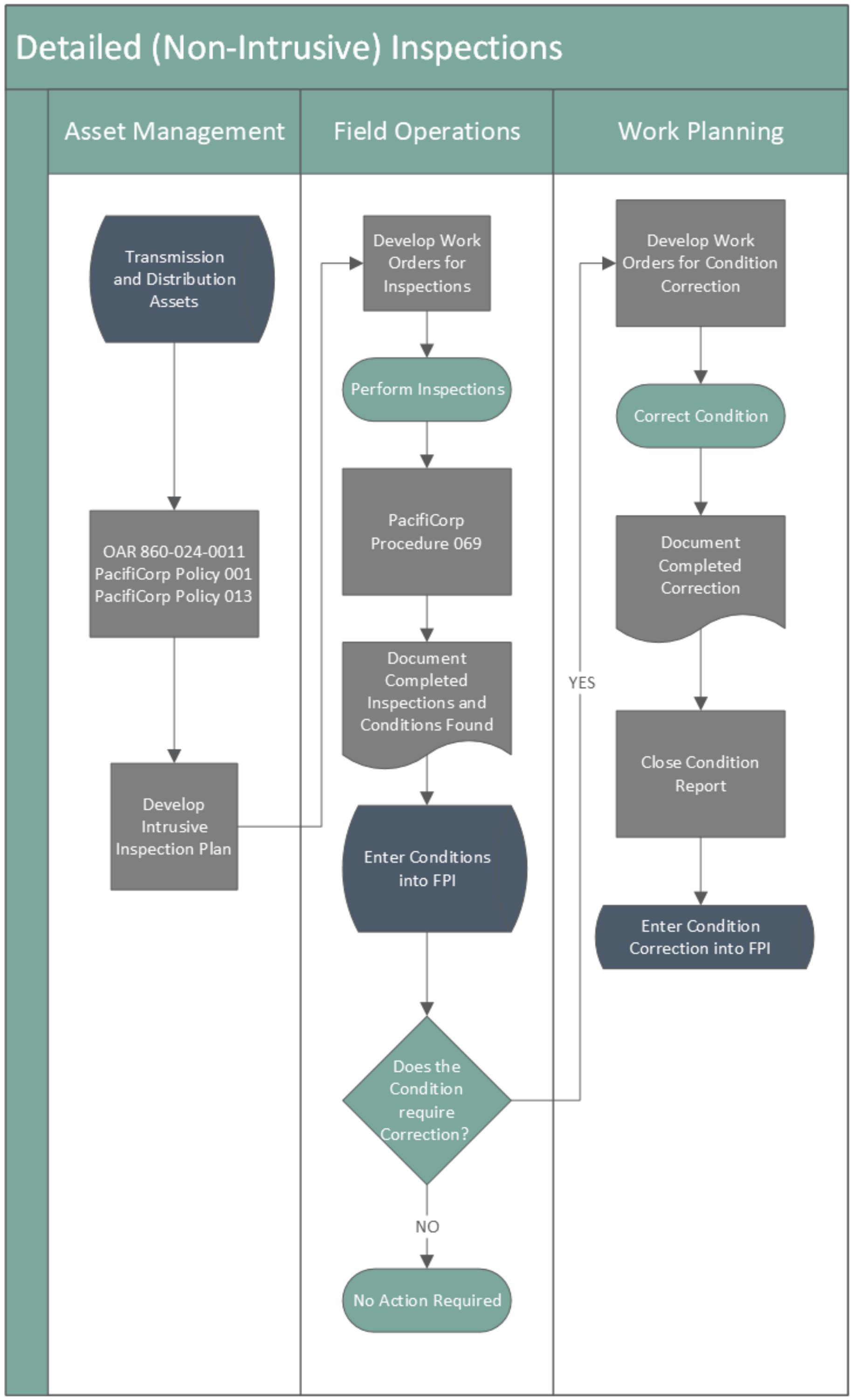


Figure 7-1: Detailed (Non-intrusive) Inspections of Transmission and Distribution Electric Lines and Equipment Workflow

Frequency of Trigger

PacifiCorp conducts its detailed (non-intrusive) inspection program on a planned cycle. Specifically, the Company inspects overhead assets located within the HFRZ more frequently than assets located outside the HFRZ to mitigate higher-risk areas. Although all required inspections are completed within the designated cycle, the Company prioritizes facility points located in the HFRZ to ensure inspections are conducted before fire season, when the risk is greatest.

7.2.1.3 Detailed (Intrusive) Pole Inspections

Overview

Tracking ID: AI-05, AI-06

PacifiCorp's detailed (intrusive) pole inspection program, which may include pole-sounding, inspection hole drilling, and excavation tests, is designed to identify decay, wear, or woodpecker damage, assess the condition of wooden poles, and identify the need for any treatment, repair, or replacement. Like other inspection programs, intrusive inspections mitigate some wildfire risk by identifying and correcting conditions. In this case, the inspections identify poles for replacement or reinforcement to prevent potential structural failures that could lead to a potential wire down event and ignition risk.

Detailed (intrusive) inspections involve multiple teams within PacifiCorp's organization. Below in Figure 7-2 is a diagram that outlines the intrusive pole process, from initiation to completion.

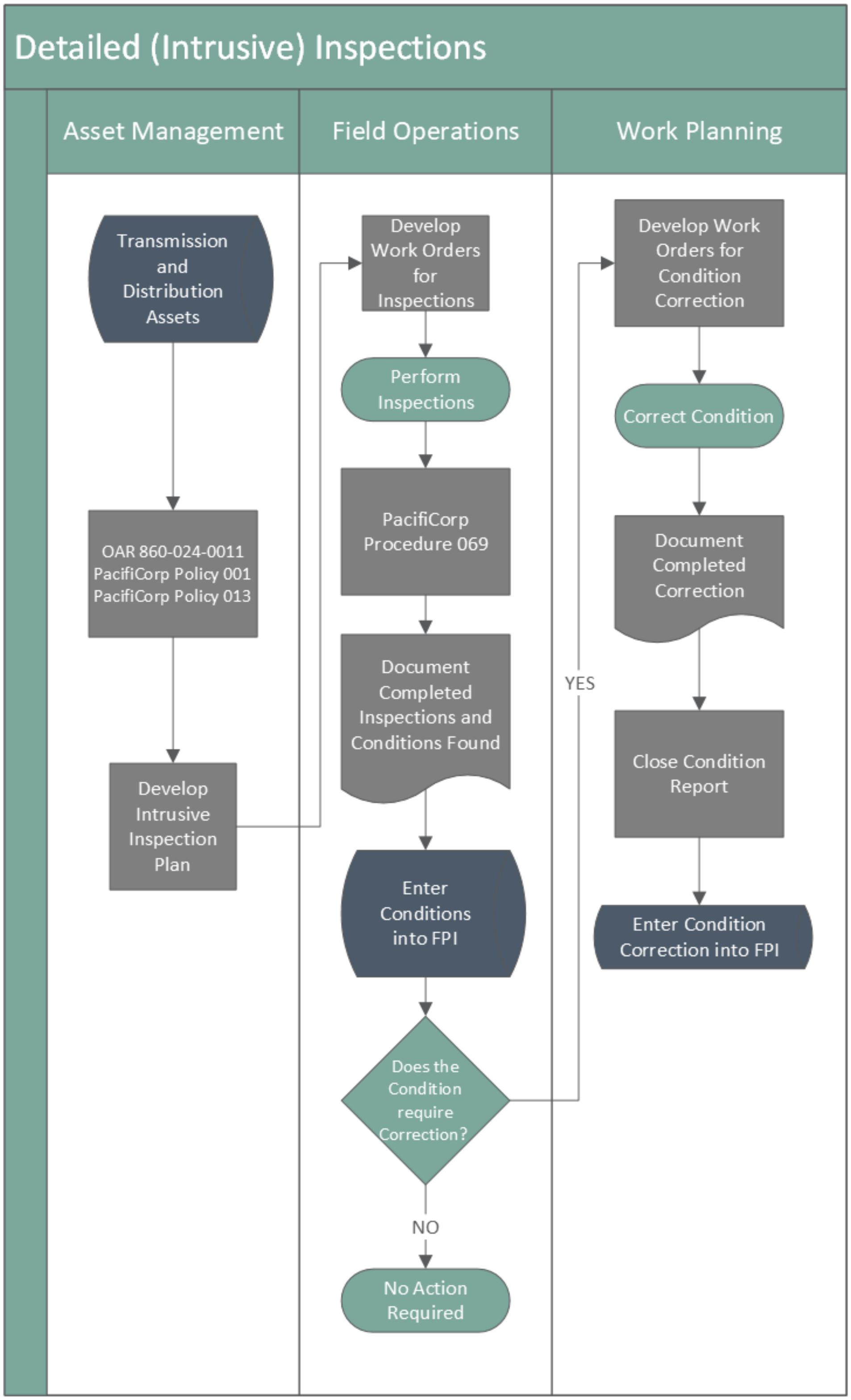


Figure 7-2: Detailed (Intrusive) Pole Inspections Workflow

Frequency of Trigger

PacifiCorp's detailed (intrusive) pole inspections are performed consistent with the cycle prescribed in OAR 860-024-0011(1)(A) predicated on the following criteria:

> *(A) "The maximum interval between detailed inspections is ten years, with a recommended inspection rate of ten percent of overhead facilities per year. During the fifth year of the inspection cycle, the Operator must:*
>
> > *(i) Report to the Commission that 50 percent or more of its total facilities have been inspected pursuant to this rule; or*
> >
> > *(ii) Report to the Commission that less than 50 percent of its total facilities have been inspected pursuant to this rule and provide a plan for Commission approval to inspect the remaining percentage within the next five years. The Commission may modify the plan or impose conditions to ensure sufficient inspection for safety purposes."*
>
> *(B) Detailed inspections include, but are not limited to, visual checks, pole test and treat programs (only required for pole Owners) or practical tests of all facilities, to the extent required to identify violations of Commission Safety Rules. Where facilities are exposed to extraordinary conditions (including High Fires Risk Zones) or when an Operator has demonstrated a pattern of non-compliance with Commission Safety Rules, the Commission may require a shorter interval between inspections.*
>
> *(c) Conduct detailed facility inspections of its underground facilities on a ten-year maximum cycle, with a recommended inspection rate of 10 percent of underground facilities per year.*

PacifiCorp maintains its system and assets consistent with OAR 860-024-0011 through a range of inspection and maintenance programs. These programs are tailored to identify conditions that could result in premature failure or potential fault scenarios, including situations in which the infrastructure may no longer meet code or engineered design or may become susceptible to external factors, such as weather conditions. Generally, these programs focus on inspection and correction of overhead and underground transmission and distribution facilities but also include substation facilities.

7.2.1.4 Substation Inspections

Overview

Tracking ID: OR-AI-11

Unlike overhead lines, substation assets are not located in public spaces. Nevertheless, substation equipment, such as circuit breakers and relays, are critical components of protection and control schemes and system operations and can have an impact on overhead line operations. Like other inspection programs, substation inspections, which assess both the substation security and key equipment condition, identify potential correction work or maintenance needed. The corrective work and maintenance described above help mitigate the risk of mis-operation that could negatively impact system protection and control schemes.

Substation inspections involve multiple teams within PacifiCorp. Below in Figure 7-3 is a flow diagram that outlines the substation inspection process, from initiation to completion.

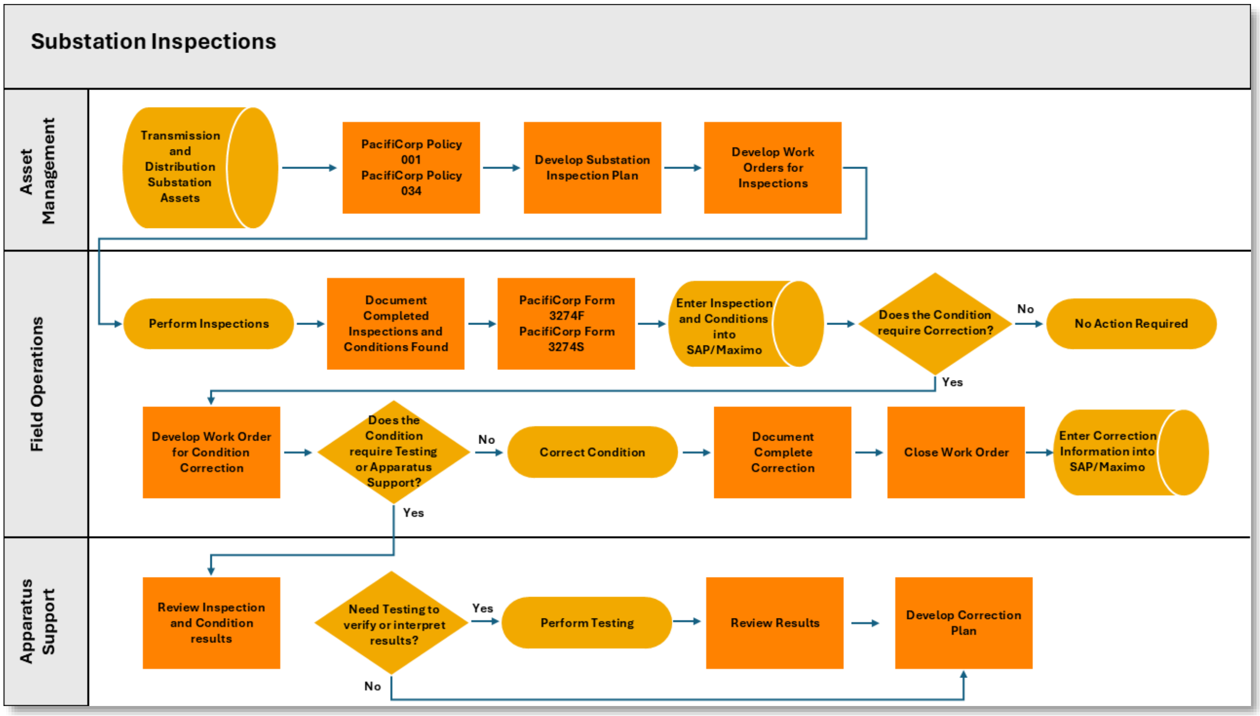


Figure 7-3: Substation Inspections Workflow

Frequency of Trigger

Substation inspections are scheduled and performed monthly, with no longer than 45 calendar days between consecutive inspections of each substation.

7.2.1.5 Infrared Inspections of Distribution Electric Lines and Equipment

Infrared inspection of distribution lines and equipment consists of thermographic imaging of equipment to detect issues such as loose of deteriorated connected, overloaded circuits, and defective equipment.

Overview

Tracking ID: OR-AI-08, OR-AI-10

The pilot distribution infrared inspections program includes inspection of all the distribution lines within the HFRZ. Starting in 2026, infrared inspections on distribution lines and assets will be incorporated into the Company's drone inspection program, which is described in Section 7.2.1.7 below and in additional detail under Areas for Additional Improvement/Recommendations Citation: 24-230-15 in Appendix C. Combining these inspections allows both activities to be completed during a single deployment, reducing the need for separate crews and minimizing duplicate site visits. This approach is intended to improve coordination and optimize data collection and cost management. The scope of the infrared inspections will change in cadence approximately halfway between the detailed inspection cycle. Below in Figure 7-4 is a flow diagram that outlines the infrared inspections of distribution electric lines and equipment, from initiation to completion.

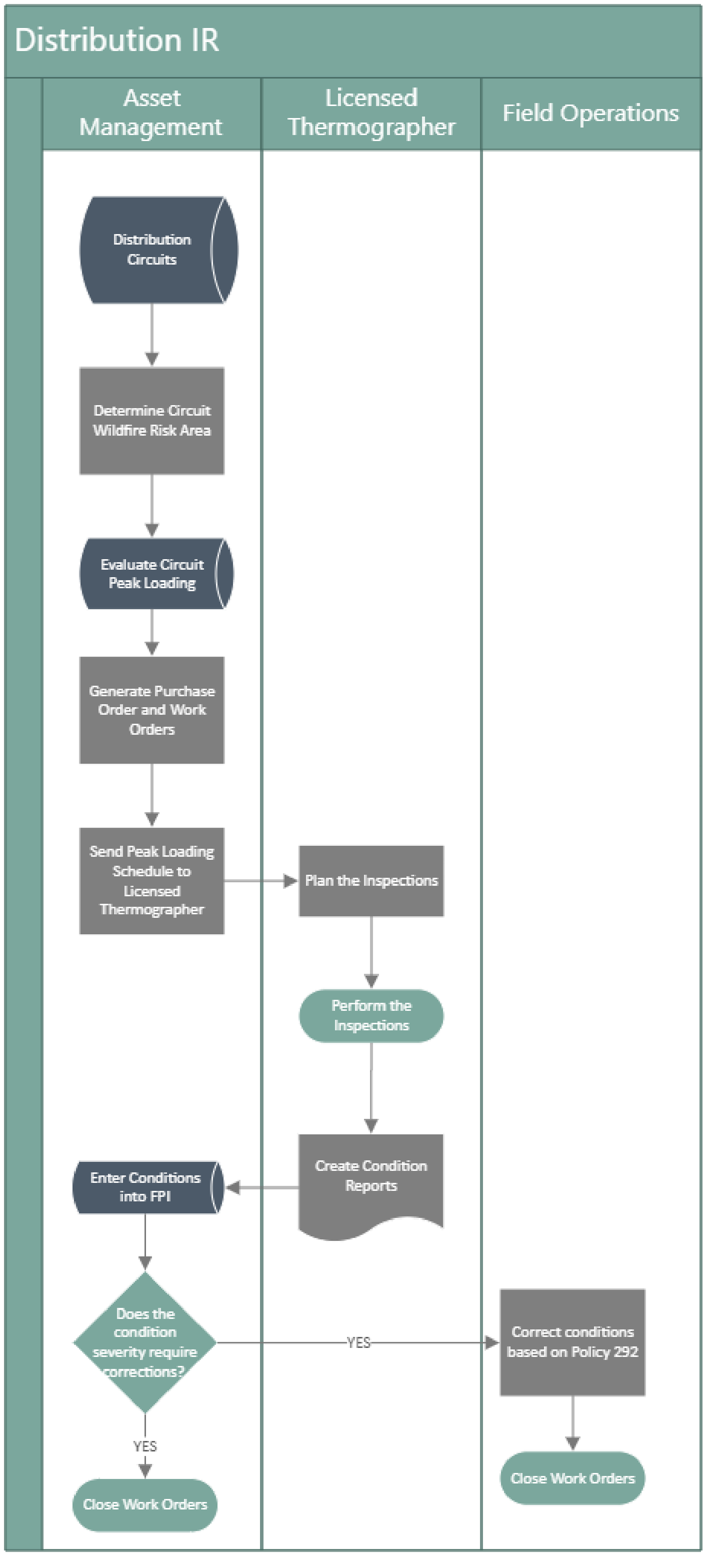


Figure 7-4: Infrared Inspections of Distribution Electric Lines and Equipment Workflow

Frequency of Trigger

PacifiCorp plans to perform inspections during anticipated peak loading intervals. Peak loading is when the equipment is under the highest potential stress, increasing the probability of finding issues via infrared inspections. Peak loading intervals are determined by looking at historical data, when available, or traditionally higher loading periods on the lines. Based on an initial review, peak intervals for distribution circuits within the HFRZ happen at two main periods throughout the year: mornings in the winter and afternoons in the summer.

7.2.1.6 Infrared Inspections of Transmission Electric Lines and Equipment

Infrared inspection of transmission lines and equipment consists of thermographic imaging of equipment to detect issues such as loose or deteriorated connections overloaded circuits, and defective equipment.

Overview

Tracking ID: OR-AI-07

PacifiCorp has implemented an enhanced transmission line inspection program with a focus on proactive identification and prevention of equipment failures. The inspections are conducted aerially with a helicopter and a licensed thermographer. Figure 7-5 is a flowchart that outlines the infrared inspections of transmission electric lines and equipment, from initiation to completion.

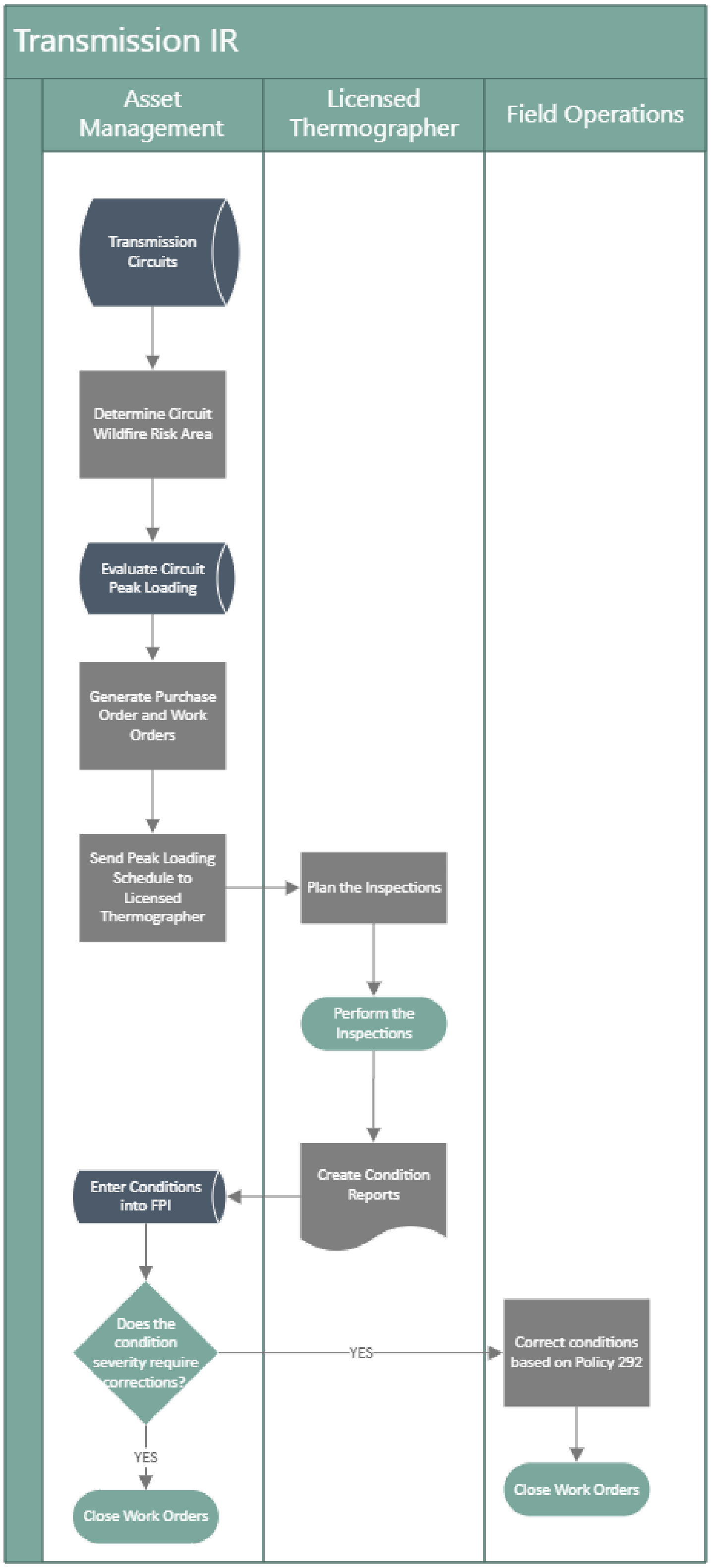


Figure 7-5: Infrared Inspections of Transmission Electric Lines and Equipment Workflow

Frequency of Trigger

The infrared inspections are performed annually for lines interconnected with or within the HFRZ. These inspections are performed during periods when the lines are near peak loading. All other transmission lines that are not interconnected with the HFRZ are inspected every two years.

7.2.1.7 Drone Inspections of Distribution Electric Lines and Equipment

Drone inspections of distribution electric lines and equipment are inspections of equipment performed by drones to identify issues that may not be identified from the ground by other inspections such as the visual assurance, detailed, or pole test and treat inspections.

Overview

Tracking ID: OR-AI-10, OR-AI-20, OR-AI-21

The Company performs drone inspections on distribution lines as needed as part of its Drone on Demand program. This program supports grid response and patrols. When additional inspections are justified, requests can be made for drone inspections in specific areas, and a pilot is assigned to complete the work. Currently, all drone inspections are performed using line-of-sight methods, but the possibility of beyond visual line-of-sight waivers is being explored. Figure 7-6 depicts the Drone on Demand process for inspections of distribution assets. Drone inspections of transmission assets, discussed in Section 7.2.1.8, follow the same process.

In 2026, the Company will begin a Distribution Drone Inspections pilot program, detailed in Table OPUC 5-2. In contrast to the Drone on Demand program, which is a reactive measure, the Distribution Drone Inspections program will be proactive. These inspections will be performed about halfway through the detailed five-year inspection cycle, so that the drone inspections are performed on an off-cycle inspection year.

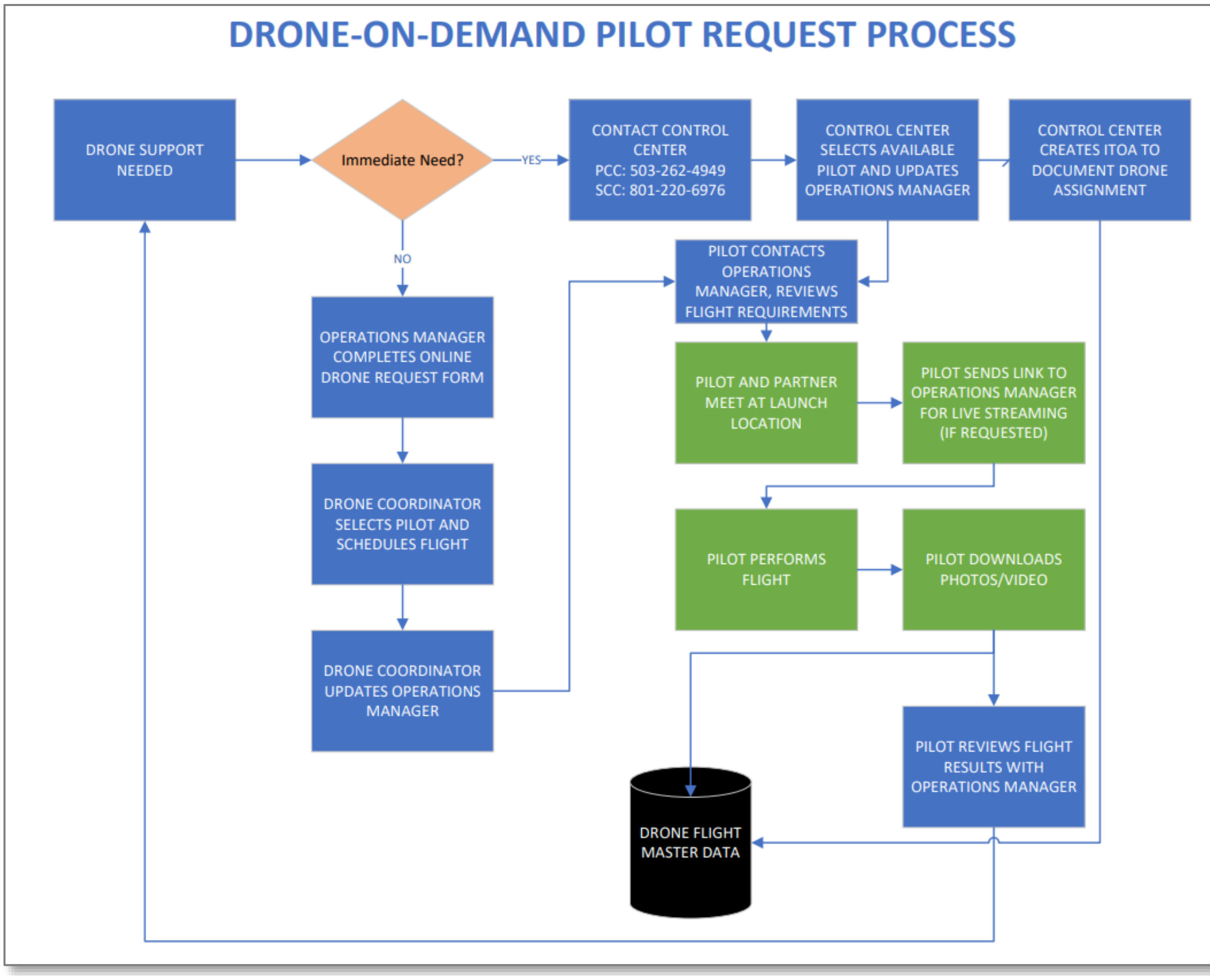


Figure 7-6: Drone on Demand Inspections of Transmission and Distribution Electric Lines and Equipment Workflow

Frequency of Trigger

The Distribution Drone Inspections pilot program will be based off of the detailed inspection cycle with inspections planned for about halfway through the inspection cycle. Tier 3 locations will be inspected on a two-year cycle, and locations in the HFRZ not in Tier 3 will be inspected on a five-year cycle.

7.2.1.8 Drone Inspections of Transmission Electric Lines and Equipment

Drone inspections of transmission electric lines and equipment are inspections of equipment performed by drones to identify issues that may not be identified from the ground by other inspections such as the visual assurance, detailed, or pole test and treat inspections.

Overview

Tracking ID: OR-AI-20, OR-AI-21

The Drone on Demand inspection program is used to supplement other transmission line inspections, such as visual assurance, detailed, pole test and treat, and infrared inspections. When an area is identified for drone support, a request can be made, and a pilot is assigned to perform the inspection. These inspections can also support patrols as a tool to aid in the inspection process. The inspections are performed with a licensed drone pilot who performs a visual line-of-sight inspection. The potential issues or conditions identified are noted, and the images saved after the inspections are completed. The Drone on Demand process for transmission inspections is the same as for distribution inspections, as shown in Figure 7-6 above.

Frequency of Trigger

A drone inspection for transmission lines is initiated at the request of an operations manager or the control center, as shown in Figure 7-6 above.

7.2.2 Asset Management and Inspection/Correction Enterprise Systems

Tracking ID: OR-ES-02

PacifiCorp employs multiple enterprise systems to support asset management and defensible space processes, as described in 8.2.7. These systems include Systems, Applications, and Products in Data Processing (SAP), Maximo, GIS, and a mainframe. Collectively, they enable the Company to track all assets deemed critical, including but not limited to distribution poles, transmission structures, padmounted and underground equipment, substation power transformers, circuit breakers, reclosers, and relays. When asset records are found to be incorrect or incomplete, or require updates, periodic cyclical inspections identify these deficiencies, prompting updates to the relevant databases.

Asset tracking is distributed across multiple databases with varying levels of integration. Line assets are managed through SAP, GIS, and the mainframe. Pole and structure data reside in the mainframe, while linear conductor data is maintained in GIS. SAP interfaces with the mainframe to store work orders and financial data. For substations, Maximo holds all asset and attribute information, while SAP manages the financials. GIS provides geospatial representation of both line and substation assets and includes location details such as street addresses and latitude/longitude coordinates.

PacifiCorp strives to have all critical line assets identified in the mainframe. Due to the dynamic character of the electric grid, however, it is difficult to attain 100% asset identification at any given time. Throughout the year, construction and restoration activities result in the addition or removal of poles and structures, meaning that enterprise systems need to be continuously updated to reflect these real-world modifications. Asset changes are entered into the mainframe such that the mainframe remains a comprehensive and current repository of critical assets. In addition, due to historical lapses in data entry, there may be occasional variances between asset data in the enterprise systems and actual assets in the field. PacifiCorp corrects such variances when they become apparent, primarily as a result of its cyclical inspections of line assets. If inspections identify assets that need to be added or removed, updates are made to the mainframe accordingly. Because variances are relatively infrequent in comparison to the large body of total assets, using cyclical inspections to identify such variances is justified.

Preventive maintenance for line assets is managed in SAP, which stores attribution data for specific line assets (e.g., manufacturer, model, serial number, age, etc.) and generates work orders based on maintenance cycles. Examples of assets tracked in SAP include battery-operated fault indicators, weather stations, and line reclosers. Once installed, line assets are recorded in GIS using as-built drawings and various forms. Currently, SAP and GIS are not integrated.

Asset Management conducts periodic audits of critical line and substation data, particularly data subject to North American Electric Reliability Corporation (NERC), Western Electricity Coordinating Council (WECC), or state regulatory standards. In addition to these audits, substation assets are regularly inspected, and discrepancies, such as missing or incorrect records, are resolved through coordinated updates to the appropriate system of record.

As part of Berkshire Hathaway Energy's (BHE) business transformation initiative, PacifiCorp is modernizing its IT systems to streamline operations. This includes migrating line equipment data from the mainframe and SAP to Maximo. GIS will become the system of record for line equipment and will be integrated with Maximo, enabling automated data transfer with minimal manual intervention.

7.2.3 Fire Season Safety Patrols

Overview

Tracking ID: OR-AI-01, OR-AI-02

Fire Season safety patrols are an annual visual non-intrusive inspection of every overhead facility point each year. The process of safety patrol inspections involves multiple teams within PacifiCorp. Below in Figure 7-7 is a flow diagram that outlines the safety patrol inspection process, from initiation to completion. The figure illustrates the workflow for conducting safety patrol inspections, beginning with asset management identifying transmission and distribution assets and developing an inspection plan. Field operations then perform inspections, document conditions, and determine whether corrective action is required. If a condition needs correction, work planning creates and completes a work order, documents the correction, and closes out the condition in the system; if not, no further action is taken.

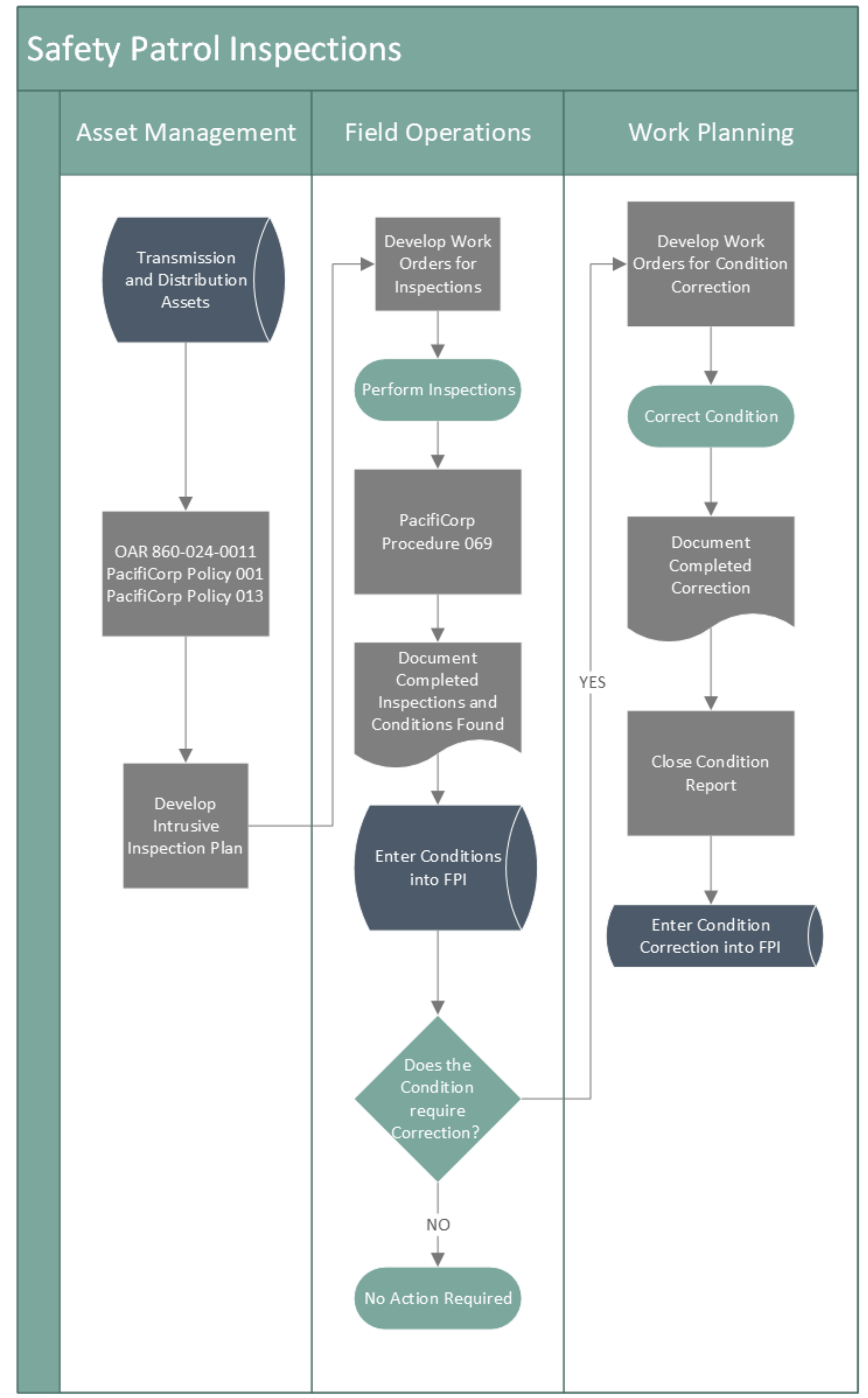


Figure 7-7: Safety Patrol Inspections of Transmission and Distribution Electric Lines and Equipment Workflow

Frequency of Trigger

PacifiCorp's safety patrol inspection program is conducted on a planned cycle. Starting in 2025, the Company's goal is to visually inspect every overhead facility point each year, regardless of whether the asset is within an HFRZ.

7.2.4 Correction – Heightened Fire Risk

OAR 860-024-0012(2) refers to conditions posing heightened risk of danger to life or property. PacifiCorp groups these as Priority A conditions. Priority A conditions have a 30-day correction period regardless of location or whether the condition is an energy release risk.

7.2.5 Correction – Imminent Danger

Imminent danger conditions are conditions found during a normal preventive maintenance inspection where it is deemed too dangerous for the inspector to leave. These conditions pose a present risk to safety or reliability. If these types of conditions are found, inspectors contact dispatch immediately, secure the site, and stay until crews arrive for further assessment and repair. Imminent danger conditions at PacifiCorp are captured by using the "I" priority.

7.2.6 Correction – Occupant Violation

Occupant violations refer to conditions related to communications companies or joint use attachments. This may include occupant threat conditions.

7.2.6.1 Occupant Threat Conditions

As a part of the inspection programs described above, the Company may also identify conditions associated with occupant equipment or poles that pose a potential heightened risk of wildfire. For example, a broken or loose occupant-owned anchor can potentially impact the structural integrity of a pole supporting PacifiCorp-owned electrical equipment, posing a heightened risk of wildfire.

Additionally, loose or broken occupant-owned bolts and hardware necessary to secure occupant-owned equipment to PacifiCorp-owned poles also poses a heightened risk of wildfire. These conditions are collected and categorized into energy release risk conditions, as described in Section 7.2.1. When these energy release risk conditions are located within the HFRZ, they are further categorized as fire threat conditions. Table 7-1 describes the subset of potential energy release risk conditions that can be associated with occupant-owned equipment or assets and that may correlate to a heightened risk of fire ignition when located within the HFRZ.

Table 7-1: Occupant-owned Energy Release Risk Conditions

Condition Type	Description
Pole replacement	A pole identified for replacement during intrusive testing or visual inspection because it does not meet strength requirements or safety factors
Loose / broken anchors and guys	Loose or broken anchor and guying on the pole identified during visual or detail inspections
Loose connections / bolts / hardware	A connection, bolt, or hardware component that is loose or missing from equipment or framing on the pole identified during visual or detail inspections
Lashing wire	Loose or broken lashing wire on the pole identified during visual or detail inspections

On September 8, 2022, the OPUC adopted requirements under rule OAR 860-024-0018 – High Fire Risk Zone Safety Standards. These requirements provide operators of electric facilities with processes for removing or de-energizing abandoned equipment during fire season, prohibiting conductor attachments to trees, conducting specialized inspections, performing annual fire season safety patrols, and correcting ignition-risk violations within specified timeframes.

This rule also prescribes that operators correct or escalate conditions associated with occupant-owned assets that pose a heightened risk of fire ignition in HFRZs. PacifiCorp uses these processes to either correct, request correction of, or escalate unresolved correction of these fire threat conditions associated with occupant-owned equipment and assets in HFRZs in Oregon.

Notification. Under the notification process required under OAR 860-024-0018, for energy release risk conditions on PacifiCorp-owned poles, notifications are communicated to attaching entities based on PacifiCorp attachment records. For energy release risk conditions on occupant-owned poles, notifications are communicated to the occupant pole owners based on PacifiCorp's pole ownership records. These notifications, which are made in accordance with the timeframes required under OAR 860-024-0018(6), leverage custom letter templates and include a description of the condition in question, location information, correction timeframes required under the OAR, and next steps available to PacifiCorp under the OAR in the event the notified party does not take action to correct the conditions.

PacifiCorp plans to require that the asset owner correct fire threats associated with occupant-owned assets consistent with these timeframes. When the asset owner is unresponsive, PacifiCorp may correct some fire threat conditions on behalf of the owner to mitigate wildfire risk and will charge the equipment owner a replacement fee of 25% of the total amount of work.[10] If the invoiced party does not pay the invoice, PacifiCorp may escalate the matter.

Escalation. If PacifiCorp does not make the repair and the notified party has not fulfilled its obligations to correct the condition, PacifiCorp will assemble the necessary documentation required for filing a complaint under OAR 860-024-0061, fill out the requisite form, and file the complaint with the commission. Similarly, if the invoiced party does not pay the invoice, PacifiCorp may file a complaint with the commission in accordance with OAR 860-024-0061 to compel payment

7.2.7 Correction – Other Division 24 Correction

PacifiCorp has no other Division 24 corrections at this time.

[10] See OAR 860-024-0018(7), which states "If the pole owner or equipment owner does not replace the reject pole or repair the equipment within the timeframe set forth in the notice, then the Operator of electric facilities may repair the equipment or replace the pole and seek reimbursement of all work related to correction or replacement of the reject pole or equipment including, but not limited to, administrative and labor costs related to the inspection, permitting, and replacement of the reject pole. The Operator of electric facilities is also authorized to charge the pole owner or equipment owner a replacement fee of 25 percent of the total amount of work."

7.2.8 Heightened Risk of Fire Ignition Correction

PacifiCorp treats the phrase "heightened risk of fire ignition" from OAR 860-024-0018(5)(a)(b) as those conditions within Procedure 069 marked as energy release risks within the HFRZ. Since PacifiCorp's timeframe for Priority A conditions is less than the required 180 days, only Priority B energy release risk conditions within the HFRZ are included.

7.2.9 Ignition Prevention Inspection

PacifiCorp defines an ignition prevention inspection as an extra inspection above and beyond what is required in OAR 860-024-0011(2)(c) and OAR 860-024-0011(1)(A). Since PacifiCorp performs visual inspections yearly, as described in Section 7.2.3, safety patrol inspections performed in even-numbered years (e.g., 2024) will be classified as regular safety patrol inspections. Safety patrol inspections performed in odd-numbered years (e.g., 2025) will be classified as ignition prevention inspections. All facility points scheduled for a detailed (non-intrusive) inspection will be classified as ignition prevention inspections. All facility points scheduled for a detailed (intrusive) inspection will be classified as detailed inspections.

7.2.10 Ignition Prevention Inspection – Occupant-owned Violation

Please see Section 7.2.6.

7.2.11 Imminent Danger Corrections

Please see Section 7.2.5.

7.2.12 Occupant Violation Corrections

Please see Section 7.2.6.

7.2.13 Removal or Permanent De-energization of Equipment

PacifiCorp has implemented a process to identify de-energized equipment, lines, and poles during field inspections. These items are flagged for additional review and evaluated for potential removal if deemed necessary. In accordance with OAR 860-024-0018(1), PacifiCorp started the effort in 2023 with companywide adoption and the addition of a new condition for the 2024 inspections.

As part of a broader risk mitigation strategy, PacifiCorp conducted a comprehensive assessment of de-energized transmission lines to be completed by the end of 2025. This assessment included:

- Conductor and pole removal evaluations
- Grounding studies
- Line segmentation analysis

The scope of this review was conducted on transmission facilities, all of which were located outside HFRZs. Based on the findings:

- Roughly half of transmission facilities (poles and conductor) were slated for removal.
- The remaining transmission facilities will undergo significant line segmentation and grounding studies.

PacifiCorp will continue to assess and address this effort each year in the inspection process.

7.2.14 Quality Control/Performance Monitoring

To perform quality assurance and quality control (QA/QC) of inspections, PacifiCorp uses a combination of process controls, software tools, Company policy, and physical records to quickly identify inaccuracies for corrective action, evaluation, root cause analysis, and system improvements. Engaging in these initiatives is a cost-effective means to minimize the risk of inaccurate or unreliable inspection results.

7.2.14.1 Overview

Software controls, annual training sessions, and other programs help shape the Company's QA/QC program. Software controls that prohibit freeform condition assignment, while also allowing for result controls, help minimize human error. In addition, quarterly reviews of previously audited facility point results serve as a secondary check, including desktop audits of inspection data. These measures have enabled the program to evolve quickly with a high degree of accuracy. Annual training sessions with inspectors are conducted to address audit findings and enhance the reliability and accuracy of inspections. During QA/QC fielding, field visits are performed with inspection crews to further calibrate practices and drive continuous improvement in the inspection program. The one-on-one support provided by the QC team during these visits plays a key role in advancing the program's development, refinement, and overall maturity. The following sections provide additional details on these components, including program enhancements, associated costs, and the evolution of the program in alignment with feedback from OPUC Safety Staff.

Table 7-2 below presents PacifiCorp's QA and QC program plan objectives.

Table 7-2: Grid Design, Asset Inspections, and Maintenance QA and QC Program Objectives

Initiative/Activity Being Audited	Activity (Tracking ID #)	Quality Program Type	Objective of the Quality Program
Distribution Detailed (Non-Intrusive) Inspections	OR-AI-12.04	QA/QC	Ensure that inspection was performed correctly and meet appliable policies
Distribution Detailed (Intrusive) Inspections	OR-AI-12.06	QA/QC	Ensure that inspection was performed correctly and meet appliable policies
Distribution Safety Patrol Inspections	OR-AI-12.02	QA/QC	Ensure that inspection was performed correctly and meet appliable policies
Transmission Detailed (Intrusive) Inspections	OR-AI-12.05	QA/QC	Ensure that inspection was performed correctly and meet appliable policies

7.2.14.2 QA and QC Procedures

Asset Inspections

Initiatives: OR-AI-01, OR-AI-02, OR-AI-03, OR-AI-04, OR-AI-05, OR-AI-06

QA/QC Tracking ID: OR-AI-12

PacifiCorp's asset inspections are supported by a structured QA/QC program that includes sampling audits, photographic verification, and oversight from district-level SMEs. QA/QC re-inspection results consistently demonstrate high inspection accuracy, confirming that identified conditions are correctly classified and corrected according to required timelines. This validation ensures the inspection program effectively reduces ignition risk by confirming that defects affecting reliability or fire safety are addressed promptly and pursuant to utility standards. This validation ensures the inspection program effectively reduces ignition risk by confirming that defects affecting reliability or fire safety are addressed promptly and pursuant to utility standards.

All QA/QC activities are tracked across a master spreadsheet, and audit results are entered into this spreadsheet for reference for field and desktop audits for both internal and external audits. Physical audits are generally reviewed the week they are received. Desktop audits reference all available information from the physical audited work and inspections performed.

In addition to these desktop and physical audits PacifiCorp reviews current asset management procedures and protocols through multiple evaluations. Policies and procedures are reviewed annually to drive improvements to assessments. This helps to ensure that any condition found in the field that could pose a threat is identified during inspections.

Following asset inspections, PacifiCorp assigns a priority code of I, A, B, or C to imminent threat conditions that could present a high potential impact on safety or reliability. When a condition carries an energy release risk, PacifiCorp reasonably assumes that conditions rated "I" or "A" priority pose a greater wildfire risk than those rated "B."

Priority I conditions, which pose a significant present threat to human life or property, are considered an imminent threat. Company policy requires immediate corrective action for Priority I conditions. If there is no imminent threat, PacifiCorp allows 30 days for the correction of Priority A conditions.

Software controls that prohibit freeform condition assignment, while also allowing for result controls, help minimize human error.

In addition to the Company's internal audit processes, PacifiCorp is externally audited by OPUC Safety Staff for NESC compliance. OPUC audits cover the entirety of PacifiCorp's service territory.

Physical Audits

PacifiCorp's QA/QC physical audits are conducted on a random selection of inspected facilities. Corrections identified during inspections are prioritized by NESC priority levels, including expedited correction timelines for conditions classified as energy release risks and in the HFRZ. The Company emphasizes audits in wildfire risk areas by prioritizing inspections in HFRZ for the first half of the year. This means these regions go through the QA/QC process first. After a physical audit is done, the audit results are compared with the original inspection results to see if they conform to the set condition reporting criteria, data entry, and work performance in accordance with Company specifications. Nonconforming results are sent to the inspection contractor for reinspection along with the required reinspection timeline. Results are shared with each inspector and reviewed during a field visit at the time of the QA/QC field activity. This effort reinforces the inspection process while opening dialog with crews in the field, removing barriers and allowing for the inspection program to evolve and mature, while also cultivating crews' commitment to improvement. This additional effort has significantly increased advancements and results in the inspection program.

Software Controls

In recent years, PacifiCorp began using cellphones and tablets to make inspection records and findings. A renewed focus on inspection QA/QC in 2020 drove enhancements to the inspection programs and structure, along with added software controls to ensure inspections and findings are recorded consistently with internal procedures. Nonconforming results are rejected. For example, if the inspection program allows only an "A" or "B" priority assignment to a certain type of finding, an inspector cannot enter a "C" priority. This ensures that findings are not accidentally mischaracterized at a lower priority level.

Quarterly Desktop Reviews

Two macro-level desktop audits are conducted quarterly; one desktop audit is conducted by the Lines Inspection Department (standard process per PacifiCorp internal policy) and another is performed by a cross-functional team of asset management, work planning, and operational performance management. The cross-functional team desktop audit prioritizes review of energy release risk conditions and conditions in the HFRZ for QA/QC and correction.

To support these ongoing reviews, a new internal tool was developed to evaluate inspection results, automatically isolate open energy release risk conditions in plots, facilitate quick data export, provide insight about trends, and drive a deeper understanding of the energy release risk conditions. Historically, in desktop reviews all open conditions were generally grouped together without specific focus areas. The new tool automatically identifies potential misalignment with internal procedures, including alignment with energy release risk priorities and types. This tool detects potential mismatches or mischaracterization of conditions, and risk can be immediately addressed. This new, quick QA/QC response is projected to address issues while they are fresh in the minds of inspectors, drive continuous improvement and learning opportunities, increase record accuracy, and improve inspection result reliability. PacifiCorp intends to continue quarterly desktop reviews, which typically include a deep dive into trends and risk.

Annual Training

PacifiCorp's Lines Inspection Department conducts annual field inspector training each January. This training covers both technical content, such as NESC standards, and programmatic elements, including how to record findings, assess priorities, ensure inspection effectiveness, and facilitate corrective actions. To reinforce this training, the QA/QC team spends the first two weeks of inspections in the field alongside inspectors, walking from pole to pole. This hands-on approach provides opportunities for real-time guidance and one-on-one support for any questions that arise. Additional field visits are conducted throughout the QA/QC process to further evaluate and calibrate inspection crews, providing continuous training and helping to cultivate improvements in the inspection program and ensure consistency across teams.

Substation Inspections

Initiatives: OR-AI-11

QA/QC Tracking ID: N/A

At this time, PacifiCorp does not have a formalized QA/QC program specific to substations. While various aspects of substation inspections and maintenance are guided by internal best practices, a comprehensive and documented QA/QC program is not currently in place.

Infrared Inspections

Initiatives: OR-AI-07, OR-AI-08

QA/QC Tracking ID: N/A

PacifiCorp does not perform QA/QC inspections on transmission or distribution infrared inspections. The infrared inspections performed on the distribution and transmission lines are to identify thermal rises in equipment that may indicate conditions needing correction. Due to the variability in loading characteristics and ambient temperature, inspection results can differ from day to day. Consequently, performing the same inspection on consecutive days may miss issues identified previously. Therefore, a formal QA/QC process is not feasible for these inspections. Instead, local crews validate the identified issues on-site, ensuring that any issues are properly addressed and corrected.

Transmission and Distribution Drone Inspections

Initiatives: OR-AI-09, OR-AI-10

QA/QC Tracking ID: N/A

The Company is developing the Distribution Drone Inspections pilot program to determine how drones can be integrated into the inspection workflow. The audit process on drone inspections will be developed throughout the pilot program to ensure the best practices are followed. Drone on Demand for both distribution and transmission line inspections is an implemented program.

7.2.14.3 Sampling Plan

Initiatives: OR-AI-12

Sampling Plan for Initiatives: OR-AI-01, OR-AI-02, OR-AI-03, OR-AI-04, OR-AI-05, OR-AI-06

Inspection results are reviewed continually to confirm that inspections in the HFRZ are meeting acceptable standards of performance. Physical audits are performed on at least 5% of planned facility inspections, with a focus on fire threats and the HFRZ. The audits are performed on a random sample of the inspections performed for each initiative category.

The sample size for each QA/QC activity is determined based on historical data and experience with PacifiCorp's existing asset inspection programs, as well as input from SMEs. Over time, it has been consistently observed that the current audit percentages are sufficient to identify discrepancies, recurring patterns, and potential issues within the inspection process. These sample sizes have proven to be representative of the overall inspection program and effective in maintaining the integrity and reliability of PacifiCorp's asset inspections.

7.2.14.4 Pass Rate Calculation

Asset Inspections

Initiatives: OR-AI-01, OR-AI-02, OR-AI-03, OR-AI-04, OR-AI-05, OR-AI-06

Pass Rate Calculation for Initiatives: AI-12

$$\text{Pass Rate}_{\text{Asset}} = \frac{\text{Total Sample Size} - \text{Conditions Found During QC}}{\text{Total Sample Size}} \text{ x } 100$$

QA/QC of Distribution Detailed Inspections

For distribution detailed inspections, the conditions found during the initial inspection are graded against the conditions found during the QA/QC process. The result is any modifications in condition findings during the QA/QC process (such as additions, modifications, or removals) go against the overall score for the given inspection area. The number of conditions found during inspection is divided by the number of condition changes made during the QA/QC process. This percentage is used to determine the failure rate for that section in the audit process. The target rate for these inspections is 90% in urban designated areas and 80% in rural areas with respect to pole and condition counts. Nonconforming results are sent to the inspection contractor for reinspection along with the required reinspection timeline.

QA/QC of Wooden Pole Intrusive Inspections (Transmission and Distribution)

For consistency, the QA/QC process for transmission and distribution intrusive inspections is the same as for detailed inspections. The conditions found during the inspection are graded against the changes made during the QA/QC process. The number of conditions is divided by the number of condition changes made during the QA/QC process. This percentage is used to determine the failure rate for the transmission or distribution intrusive inspection. The target rate for these inspections is 90% in urban designated areas and 80% in rural areas with respect to pole and condition counts. Nonconforming results are sent to the inspection contractor for reinspection along with the required reinspection timeline.

7.2.14.5 Documentation of Findings

Asset Inspections

Initiative: AI-12

Documentation of Findings for Initiatives: OR-AI-01, OR-AI-02, OR-AI-03, OR-AI-04, OR-AI-05, OR-AI-06

All QA/QC activities are tracked across a master spreadsheet. All audit results are entered into this spreadsheet for reference for field and desktop audits for both internal and external audits. External audits are reviewed the week they are received. Internal audits reference all available information from the external audited work and inspections performed.

For all asset inspection audit programs, the failure rate, if applicable to the program, and the types of conditions missed are reviewed by the QA/QC team. Recurring meetings allow for discussion and ensure alignment between all QA/QC team members. If the pass rate for the audit is below the targeted pass rate, the inspection area is assigned for reinspection. Analysis is performed during the QA/QC process and reviewed against previous results to determine if there is a systemic concern, or greater focus is needed with specific individuals. Continued training, shadowing, and field meets provide improvement in the program and allow for continued growth in the maturity of the inspection program. Continuing issues with individual inspectors are monitored and reviewed frequently. The appropriate corrective action plan is taken to ensure issues do not persist.

7.2.14.6 Changes to QA and QC Since Last WMP and Planned Improvements

Asset Inspections

Tracking ID: OR-AI-12

QA/QC for Initiatives: OR-AI-01, OR-AI-02, OR-AI-03, OR-AI-04, OR-AI-05, OR-AI-06

PacifiCorp strives for inspection results to be as accurate as possible and aims for a QA/QC pass rate of 100%. PacifiCorp manages its QA/QC process with this goal in mind. For WMP initiative reporting, the Company currently uses a target and then reports on a QA/QC pass rate that was developed in reference to managing the independent inspection contractors who perform the detailed and intrusive inspections. The target rate for these inspections is 90 percent in urban designated areas and 80 percent in rural areas in respect to pole and condition counts. Nonconforming results are sent to the inspection contractor for reinspection along with the required reinspection timeline.

7.2.15 Inspect/Correct – Other

PacifiCorp has no other Division 24 corrections at this time.

7.3 Results

Infrared Inspections of Distribution Electric Lines and Equipment: As described above, PacifiCorp performed a pilot inspection in 2023 and 2024 on 20,000 distribution poles and approximately 33,000 poles in 2025. The Company will utilize a contracted resource to perform the infrared inspections.

Infrared Inspections of Transmission Electric Lines and Equipment: The enhanced infrared inspection program for transmission lines has been conducted since 2021. Since then, there have been improvements made to the loading classification of the lines, which allowed fewer timeframes and increased efficiency in scheduling the inspections. There have been improvements made to how conditions are reported to align better with other asset inspection and correction programs.

Table 7-3 shows the number of power company conditions found from January 1 through the end of the third quarter of 2025 across all of Oregon

Table 7-3: Asset Corrections Found

OPUC Correction	OPUC Corrective Timeframe	Utility Correction Type Name	Total Conditions Found (Within HFRZ)	Total Conditions Found (Non-HFRZ)
Imminent danger	Made safe immediately	Priority I	0	1
Conditions posing heightened risk of danger to life or property	2 Years	Priority A	280	1,555
Conditions posing little risk of danger to life or property	10 Years	Priority B	4,221	13,446
Heightened risk of fire ignition (within HFRZ)	180 Days	Priority A and B energy release risk conditions located in HFRZ	1,210	N/A

Table OPUC 7-3 shows the number of power company condition corrections inside the HFRZ from January 1 through the end of the third quarter of 2025 (for conditions found in any year).

Table OPUC 7-3: HFRZ Asset Correction Summary

OPUC Correction	OPUC Corrective Timeframe	Utility Correction Type Name	Total Findings	Corrected on Time	Corrections Past Due	Average Days to Correct
Imminent danger	Made safe immediately	Priority I	0	0	0	N/A
Conditions posing heightened risk of danger to life or property	2 Years	Priority A	1,667	1,091	576	80
Conditions posing little risk of danger to life or property	10 Years	Priority B	14,899	12,823	2,088	330
Heightened risk of fire ignition (within HFRZ)	180 Days	Priority A and B energy release risk conditions located in HFRZ	1,525	254	1,271	92

The work order process is initiated during asset inspections, regardless of inspection type. The inspector will notate any potential violations or noteworthy observations by assigning a condition code and priority level in PacifiCorp's FPI system. Priority levels are assigned to align with OAR 860-024-0012 and OAR 860-024-0018 requirements.

While the same condition codes are used throughout PacifiCorp's service territory, the timeframe for corrective action varies depending on location within the HFRZ and the energy release risk. In all cases, the timeline for corrections considers the priority level of any identified condition. Conditions are planned and corrected consistently with the timeframes set forth in OAR 860-024-0012 and OAR 860-024-0018. Correction timeframes meet or exceed OAR requirements. For example, corrections are accelerated in the HFRZ, as discussed in greater detail below.

The Company designates certain conditions as energy release risk conditions. As the name implies, these are conditions that, under certain circumstances, may increase the likelihood of a fault event and the associated release of energy at the location. Certain condition codes are categorically designated as energy release risks. If a condition is designated as an energy release risk and the condition is located within the HFRZ, it is deemed a fire threat condition, which means the condition is treated as a type that corresponds to a heightened risk of fire ignition. Energy release risk conditions will have accelerated correction time periods within HFRZ to align with OAR 860-024-0018 requirements.

Once the condition is added to FPI, it is considered an outstanding condition. PacifiCorp uses the Geographic Information Systems Maintenance Organizer (GISMO) application tool to identify suggested correction dates. Corrections are scheduled for completion by the GISMO suggested correction date. While these suggested correction dates help the Company prioritize corrections and align with compliance requirements, in many cases, they will not match compliance requirements exactly.

To promote operational efficiency, corrections may be bundled with other work or prioritized such that the correction is completed after the GISMO suggested correction date but before the OAR 860-024-0012 and OAR 860-024-0018 compliance correction date. Typical scenarios that can affect correction times include customer-related issues, third-party refusal, no access, permit requirements, and system emergencies; however, these circumstances are uncommon. Furthermore, it is critical to note that suggested correction dates may change over time to reflect changes in regulations, risk, or operational efficiency requirements.

Once correction work is complete, FPI is updated to show the nature of the work, the completion date, and the identity of the persons who performed the work. Once the conditions are marked complete, the work order is complete.

Any condition that is not completed on or before the compliance date is considered past due. Work orders are actively monitored and tracked so they can be corrected as soon as possible.

7.4 Initiatives and Targets

7.4.1 Initiative Table Summary

Table OPUC 7-4 presents PacifiCorp's 2026-2028 asset inspection and correction initiatives, targets, and cost summary.

Table OPUC 7-4: Inspect/Correct Initiative Cost Summary in Thousands

Initiative Activity	Tracking ID	Target Unit	2026 Target	2026 Forecast ($1,000)	2027 Target	2027 Forecast ($1,000)	2028 Target	2028 Forecast ($1,000)	Three-Year Total ($1,000)	Section
Transmission Patrol Inspections	OR-AI-01	Facility Points	45,637	[redacted]	45,637	[redacted]	45,637	[redacted]	[redacted]	7.2.3
Distribution Patrol Inspections	OR-AI-02	Facility Points	366,906	[redacted]	364,802	[redacted]	364,705	[redacted]	[redacted]	7.2.3
Transmission Detailed Inspections	OR-AI-03	Facility Points	8,203	[redacted]	5,296	[redacted]	5,607	[redacted]	[redacted]	7.2.1.2
Distribution Detailed Inspections	OR-AI-04	Facility Points	20,304	[redacted]	17,316	[redacted]	16,149	[redacted]	[redacted]	7.2.1.2
Transmission Intrusive Pole Inspections	OR-AI-05	Poles	4,300	[redacted]	4,652	[redacted]	5,036	[redacted]	[redacted]	7.2.1.3
Distribution Intrusive Pole Inspections	OR-AI-06	Poles	38,293	[redacted]	40,397	[redacted]	40,494	[redacted]	[redacted]	7.2.1.3
Enhanced Infrared Inspection on Transmission Lines	OR-AI-07	Circuits	71	[redacted]	133	[redacted]	71	[redacted]	[redacted]	7.2.1.6
Distribution Infrared Inspections (PILOT)	OR-AI-08	Facility Points	16,285	[redacted]	13,200	[redacted]	19,252	[redacted]	[redacted]	5.6, 7.2.1.5, 7.4.1
Distribution Drone Inspections (PILOT)	OR-AI-10	Facility Points	16,285	[redacted]	13,200	[redacted]	19,252	[redacted]	[redacted]	5.6, 7.2.1.7, 7.4.1
Quality Assurance/Quality Control (Asset Inspections)	OR-AI-12	Facility Points	3,555	[redacted]	3,383	[redacted]	3,364	[redacted]	[redacted]	7.2.14
Drone on Demand Patrol	OR-AI-20	N/A	N/A	[redacted]	N/A	[redacted]	N/A	[redacted]	[redacted]	7.2.1.7, 7.2.1.8
Software Supporting the Drone on Demand Patrols	OR-AI-21	N/A	N/A	[redacted]	N/A	[redacted]	N/A	[redacted]	[redacted]	7.2.1,7, 7.2.1.8, 7.4

Costs for the infrared and drone pilots OR-AI-08 and OR-AI-10 are combined; the inspections will be performed jointly by the same vendor.

In addition to the initiative with targets described in Section 7.2 above, initiative OR-AI-21 is to capture costs for the ongoing software costs for OR-AI-20, the Drone on Demand program. There are no targets for OR-AI-21, as it is support costs for the program.

7.5 Continuous Improvement

PacifiCorp will perform a quarterly review of past-due Priority A and Priority B fire threat conditions and create plans to ensure they are addressed. While the timeline for correction of Priority I is immediate due to the imminent threat, this review will include the past-due Priority A and Priority B fire threat conditions to ensure they are addressed timely.

As part of Berkshire Hathaway Energy's (BHE) business transformation initiative, PacifiCorp is modernizing its IT systems to streamline operations. This Includes migrating line equipment data into PacifiCorp's mainframe and SAP to Maximo. GIS will become the system of record for line equipment and will be integrated with Maximo, enabling automated data transfer with minimal manual intervention. GIS will become the system of record for wires equipment and will be integrated with Maximo. Asset information will be passed from GIS to Maximo with minimal manual intervention.

PacifiCorp retained a systems integrator to assist PacifiCorp with its systems implementations, including the migration from the legacy mainframe to the new enterprise asset management software suite. This systems integrator assisted PacifiCorp's previous systems implementation in 2022 for substation asset management systems.

PacifiCorp also utilizes industry best practices to maintain data integrity in preparation for systems implementations, including iterative practice data loads, iterative functionality testing and other industry standard practices to ensure quality results. PacifiCorp uses a robust, standardized process after implementation to ensure data quality and integrity, including a support function to correct any potential issues that may arise.

8. Vegetation Management

8.1 Overview

PacifiCorp's vegetation management program is modeled on industry best practices to maintain conductor-to-vegetation clearance requirements and address reliability, resiliency, and wildfire ignition risks. Table OPUC 8-1 summarizes PacifiCorp's vegetation inspection program for overhead electrical assets.

Table OPUC 8-1: Vegetation Inspection Types

OPUC Inspection Type	Area	Utility Program Name	Utility Program Details	Utility Corrective Timeframe
Routine Non-Wildfire	Distribution and Transmission Territory wide	Routine	Detailed Inspection	Target within calendar year
Routine Wildfire	Distribution and Transmission HFRZ	Off-Cycle or Incremental	Patrol Inspection	Target within calendar year
Non-Routine	Distribution and Transmission	Discretionary Off-Cycle or Incremental	Discretionary Patrol Inspection and Ticket Work	Target within calendar year

While it is not feasible to eliminate all vegetation contact without drastically altering the landscape near power lines, the primary objective of a vegetation management program is to mitigate grow-in and fall-in risks by maintaining safe clearances between vegetation and power lines. These efforts are consistent with OAR 860-024-0016 and align with utility goals of enhancing safety, reliability, and wildfire risk mitigation, particularly in high fire risk zones. These efforts require collaboration among utilities, customers, and government agencies.

Vegetation management on distribution lines typically follows a planned multi-year cycle, such as a three-year schedule, during which vegetation is inspected and maintained to achieve safe clearance distances. Trees growing near power lines within rights-of-way are pruned to maintain sufficient distance. Dead, diseased, or otherwise compromised trees (hazard trees) that pose a risk of falling into power lines are removed as soon as reasonably possible to reduce fall-in risks. Additionally, volunteer saplings, or small unplanned trees that could eventually grow into power lines, are removed as part of long-term vegetation management efforts. Vegetation management activities adhere to national standards, such as American National Standards Institute (ANSI) standard A300 and the International Society of Arboriculture (ISA) Best Management Practices, to ensure the health and safety of vegetation. Inspections are conducted to identify vegetation maintenance activities including hazard trees and pruning or removal needs. Additionally, inspections, or "post-audits," are conducted to evaluate the quality of completed work.

PacifiCorp has transitioned from a four-year distribution inspection and maintenance cycle to a three-year cycle, except for the Portland district, which remains on a two-year cycle. Along with this transition, PacifiCorp elected to maintain the clearance distances achieved during the four-year cycle, which are larger than post-work clearance distances PacifiCorp historically associated with a three-year cycle as identified in previous versions of PacifiCorp's *Transmission & Distribution Vegetation Management Program Standard Operating Procedures*. This was done to maintain the larger post-work clearance distances during cycle maintenance with an increase in frequency to mitigate line obstructions grow-in risks.

Section 8.2.2 below lists the distribution post-work clearance distances. Vegetation management on transmission lines requires even larger clearances due to the higher voltages and greater risks associated with these lines. PacifiCorp maintains clearances that exceed the minimum vegetation clearance distances (MVCD) outlined in reliability standards such as NERC FAC-003-5 by applying an "action threshold" to the MVCD to determine when vegetation work is needed. For example, a 500 kV line may require an MVCD of 8.5 feet; however, PacifiCorp uses an action threshold of 18.5 feet (a 10-foot buffer) to ensure proactive management. Post-work clearances are chosen to provide long-term safety, with a 500 kV line requiring a post-work clearance of 50 feet. Where conditions and property rights allow, integrated vegetation management practices may be employed to encourage low-growing, compatible vegetation while removing species likely to violate clearance requirements. Transmission lines are inspected on two different schedules. Main grid transmission lines, which generally include lines above 200 kV, are inspected annually. Local transmission lines, which generally include lines below 200 kV are typically inspected at a minimum of once every three years. Potential compliance conditions identified are addressed, and additional vegetation work is scheduled based on inspection results and local conditions.

To identify and address risks effectively, PacifiCorp adheres to ANSI A300 industry standards, which include Level 1 and Level 2 assessments. Level 1 assessments are "limited visual assessments of a tree or population of trees" to identify "specified conditions or obvious defects," while considering other factors such as wind patterns and slope. Level 2 assessments involve closer examinations of suspect trees to further review the tree and may be conducted when warranted. PacifiCorp typically conducts ground-based inspections. Aerial inspections may take place (generally for transmission lines), and PacifiCorp typically follows up these inspections with ground-based inspections. After pruning or removal activities, post-work inspections are conducted where applicable as part of an audit and quality review process to ensure compliance with clearance standards and identify opportunities for process improvements.

PacifiCorp's vegetation management efforts play a vital role in reducing wildfire risks and maintaining reliable service to customers while adhering to industry best practices and safety standards.

8.2 Mitigations

8.2.1 Vegetation Inspections

Tracking ID: OR-VM-01, OR-VM-03, OR-VM-04, OR-VM-16, OR-VM-17

PacifiCorp conducts vegetation management inspections, including routine and off-cycle or incremental inspections of vegetation near overhead distribution and transmission lines to minimize safety, reliability, and wildfire ignition risks. Vegetation management inspections are typically planned; however, inspections may be conducted in response to weather conditions or customer/jurisdictional requests (such as tickets). As presented in Table OPUC 8-1 above, inspections are categorized as detailed, patrol (in HFRZ), or discretionary patrol (typically non-HFRZ). Inspection frequencies are presented in Table 8-1 below.

Table 8-1: Vegetation Inspection Frequency, Method, Criteria

Line Class	Inspection Activity (Program)	Area Impacted	Frequency	Initiative ID
Distribution	Routine	Territory-wide	Every three years	OR-VM-01
Distribution	Off-cycle	Lines or portions of lines within the HFRZ not scheduled for routine inspection	Annual	OR-VM-03
Transmission	Routine Main Grid	Territory wide (NERC FAC-003-5 Applicable Lines)	Annual	OR-VM-17
Transmission	Routine Local	Territory wide	Minimum every three years	OR-VM-16
Transmission	Off-cycle[11]	Lines within or portions of lines within HFRZ not scheduled for routine inspection	Annual	OR-VM-04

Inspections aim to identify vegetation conditions inconsistent with PacifiCorp standards to ensure compliance with industry regulations and reduce vegetation disruptions. The scope of the inspection varies depending on the type of inspection. Inspection scopes are summarized in Table 8-2.

Table 8-2: Summary of Inspection Scope

Line Class	Inspection Activity (Program)	Summary of Scope
1. Distribution 2. Transmission	1. Routine 2. Routine Main Grid and Routine Local	• Visual assessment of clearance distances against thresholds (where applicable) and mandatory clearance distances • Identification of hazard trees • Identification of discretionary removals, including cycle busters • Identification of brush, including volunteer trees • Identification of vegetation that may encroach mandatory clearance distances prior to next scheduled routine inspection • Identification of tree houses (clearance issues) • Identification of readily climbable trees • Identification of vines on poles • Identification of chemical maintenance

[11] In this context "off-cycle" with respect to transmission refers to inspections conducted in years where the routine inspection is not conducted.

Line Class	Inspection Activity (Program)	Summary of Scope
1. Distribution 2. Transmission	1. Off-cycle	• Visual assessment of clearance distances against thresholds (where applicable) and mandatory clearance distances • Identification of hazard trees • Identification of vegetation that may encroach mandatory clearance distances prior to next scheduled inspection

PacifiCorp develops an annual plan that identifies the sequence of routine and off-cycle inspections of distribution and transmission lines. Scheduling is informed by risk prioritization to target high-risk areas, specifically lines within HFRZ. Distribution and transmission lines in these high-risk areas are generally prioritized for inspection over other distribution and transmission lines, considering factors such as tree growth rates, species characteristics, the timing of the last maintenance, and environmental factors (e.g., weather). These factors are considered by PacifiCorp's utility forestry arborists with the working knowledge to qualitatively prioritize distribution and transmission lines for inspection. The order in which distribution and transmission lines are inspected and subsequently worked is typically consistent from cycle to cycle.

In some cases, inspections may be triggered outside the fixed schedule due to severe weather events as described in Section 8.2.8, risk model outputs, or operational requests based on reliability metrics or customer reports. For example, inspections may be conducted after storms or during periods of elevated fire risk to identify and mitigate emerging hazards. This flexible approach ensures that vegetation management addresses both scheduled and unexpected risks, adapting to evolving conditions as needed.

Vegetation management inspections adhere to industry best practices and PacifiCorp's Transmission & Distribution Vegetation Management Program Standard Operating Procedures (SOP), Revision 8, dated 8/29/2024, and are compliant with NERC FAC-003-5, where applicable.

8.2.2 Clearance

During vegetation inspections of distribution and transmission lines, vegetation is identified for pruning or removal to achieve minimum post-work clearance distances. These clearance distances aim to maintain proper conductor-to-vegetation clearance for compliance with applicable regulations, such as OAR 860-024-0016 – Minimum Vegetation Clearance Requirements.

Tree growth rates determine the required minimum post-work clearance distances. For example, fast-growing trees, defined as those growing more than three feet per year, require greater post-work clearance than slower-growing trees to maintain the desired clearance throughout the cycle. Regarding clearances around distribution lines, PacifiCorp incorporates spatial concepts to account for variations between side clearances, under clearances, and overhang clearances. Vegetation management contractors consider growth rates at the time of inspection and maintenance. These practices ensure safety and reliability while adhering to clearance guidelines tailored to both high-risk and standard areas. The minimum post-work clearance distances for PacifiCorp's Oregon service territory are presented in Table 8-3.

Table 8-3: Distribution Minimum Post-Work Vegetation Clearance Distances in non-HFRZ and HFRZ

Clearance	Slow-Growing (<1 ft./yr.)	Moderate-Growing (1-3 ft./yr.)	Fast-Growing (> 3 ft./yr.)
Non-HFRZ			
Side Clearance	8 ft.	12 ft.	14 ft.
Under Clearance	10 ft.	14 ft.	16 ft.
Overhang Clearance	12 ft.	14 ft.	14 ft.
HFRZ			
Side Clearance	12 ft.	12 ft.	14 ft.
Under Clearance	12 ft.	14 ft.	16 ft.
Overhang Clearance	12 ft.	14 ft.	14 ft.

PacifiCorp follows national, state and local standards and best practices when pruning trees to ensure the maintenance of healthy vegetation. PacifiCorp also targets "cycle buster" trees, or trees that grow at a rate where they may not make it through the routine maintenance cycle.

Clearance work on transmission lines is guided by three concepts:

1. Minimum vegetation clearance distances (MVCD)
2. Action thresholds
3. Minimum clearances following work

MVCD represent the radial distances from the conductors within which trees shall not encroach. These distances are established in NERC FAC-003-5 and must be maintained. PacifiCorp's action thresholds are designed to provide a 10-foot buffer from the MVCD. Clearance work is performed if vegetation is identified within or encroaching on (considering the next scheduled inspection) the action threshold distance from a conductor. Minimum clearances following work are designed to maintain an appreciable buffer with the MVCD. If a tree is within the action threshold and pruned, it should be cleared to the minimum clearance following work.

The MVCD, action thresholds, and minimum clearances following work differ by transmission line voltage. as shown in Table 8-4.

Table 8-4: Transmission Clearance Requirements

	Line Voltage							
	500 kV	345 kV	230 kV	161 kV	138 kV	115 kV	69 kV	>69 kV
MVCD	8.5 ft.	5.3 ft.	5.0 ft.	3.4 ft.	2.9 ft.	2.4 ft.	1.4 ft.	N/A
Action Thresholds	18.5 ft.	15.5 ft.	15 ft.	13.5 ft.	13 ft.	12.5 ft.	10.5 ft.	10 ft.
Minimum Clearances Following Work	50 ft.	40 ft.	30 ft.	30 ft.	30 ft.	30 ft.	25 ft.	20 ft.

Furthermore, clearance risks are addressed through inventory reduction efforts, such as discretionary removals and the application of tree growth regulators where appropriate.

8.2.3 Fall-In Mitigation

PacifiCorp's vegetation management program identifies fall-in risk during routine and off-cycle inspections, consistent with ANSI A300. Trees identified as a hazard by the inspectors are documented for mitigation.

As described in Section 8.2.2, PacifiCorp determines post-work clearance distances using spatial concepts. Overhang and side clearances are meant to account for fall-in risk from branches or limbs.

Long-term risk, including fall-in risk, is addressed through inventory reduction efforts, such as discretionary removals and the application of tree growth regulators where appropriate.

Pruning, removal, and other vegetation management activities follow the same schedule as the inspection activities described in Section 8.2.1 in other words, transmission and distribution lines are generally worked in the order they are inspected. Transmission and distribution lines in HFRZ are generally prioritized for vegetation management maintenance over other power lines.

8.2.4 High-Risk Species

High-risk species are those species of vegetation that generally have a higher risk of either coming into contact with power lines or causing an outage or ignition. High-risk species may have characteristics that make them problematic to manage or maintain in compliance through a cycle. Characteristics may include growth rate; failure rates of limbs, trunk, and/or roots (compared to other species); height at maturity; flammability; and vulnerability to disease or insects.

As stated in Section 8.2.2, PacifiCorp includes in its clearance practices the identification of cycle buster trees and other fast-growing trees that are candidates for application of tree-growth regulators or removal. PacifiCorp has recently expanded its use of tree-growth regulators and continually seeks opportunities for their application. Tree growth regulators are applied to slow a tree's growth rate. Application of tree growth regulators often reduces pruning needs and may improve vegetation health.

8.2.5 Wood and Slash Management

PacifiCorp's wood and slash/debris management practices are part of the base vegetation management program. PacifiCorp manages or disposes of debris typically less than six inches in diameter through the methods described below, in accordance with industry management best practices. The appropriate method of debris management depends on the location where the vegetation maintenance is performed.

In developed areas, debris is typically chipped and hauled offsite. In undeveloped areas, debris may be chipped and broadcast onsite. In inaccessible areas, debris may be disposed of onsite through lop and scatter techniques. These debris management activities are conducted, as appropriate, in conjunction with pruning and removal activities. Decisions to deviate from these typical debris management practices are made during inspection through landowner coordination where applicable (e.g., landowner requests chips be left onsite). Wood is typically cut into manageable lengths and left onsite, as it is the landowner's property.

Related to wood and slash management, PacifiCorp employs the appropriate use of herbicide and tree-growth regulators. By preventing and/or inhibiting undesirable vegetation growth, the volume of slash/debris can be further reduced. PacifiCorp uses herbicides and tree-growth regulators in targeted areas, with the approval of the property owner or land management agency.

8.2.6 Pole Clearing

Tracking ID: OR-VM-19

Pole clearing is designed to reduce the risk of fire ignition if sparks are emitted from electrical equipment. PacifiCorp's pole clearing program includes clearing vegetation around the base of subject poles, which are typically poles with equipment such as fuses, arrestors, and transformers, and are within HFRZ. PacifiCorp conducts pole clearing activities by removing all vegetation within a 10-foot radius around the pole and applying herbicides and/or soil sterilant to prevent any vegetation regrowth, unless prohibited by law or the property owner. Pole clearing activities are conducted once annually on the prioritized poles. The sequence in which subject poles are inspected and subsequently worked is typically consistent year-over-year, at the circuit level. Figure 8-1 below is an illustration of the pole clearing distances.

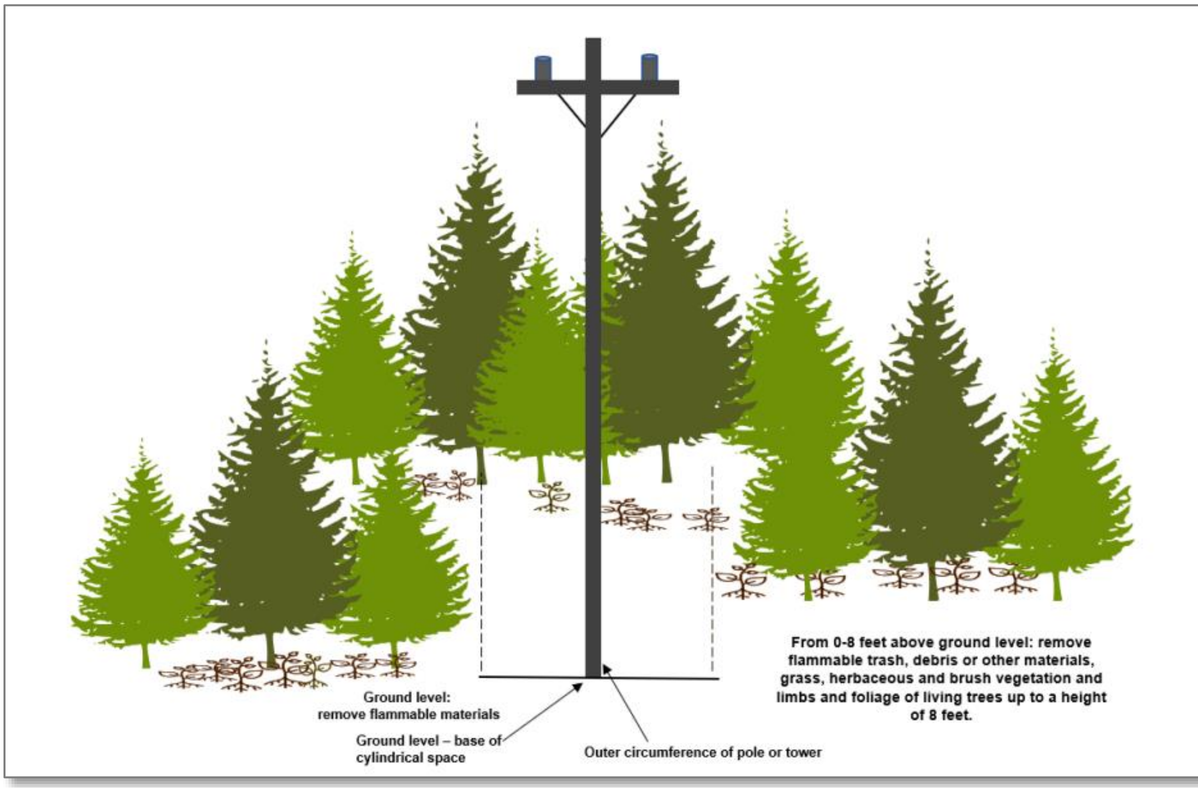


Figure 8-1: Pole Clearing

8.2.7 Substation Defensible Space

Tracking ID: OR-VM-25

PacifiCorp performs substation defensible space management to reduce wildfire risk in substations.

Vegetation removal is performed annually by licensed contractors who spray herbicide inside the substation, along the perimeter, and through the fence line at the substation. Defensible space management at substations is prioritized based on accessibility of the substations due to weather and road conditions.

Additionally, substation inspections, as described in Section 7.2.1.4, determine where vegetation may pose a current or future risk to substation equipment. As part of the substation inspections, PacifiCorp identifies any vegetation overhang limbs or climbable vegetation and verifies there are no weeds inside the substation. Substations are inspected monthly, following substation inspection procedures.

Substation equipment inspections are scheduled based on the procedures described in Section 7.2.1.4.

8.2.8 Emergency Response Vegetation Management

PacifiCorp plans and executes operational changes, including PSPS events, to address wildfire risk during elevated fire weather conditions. In these instances, vegetation management supports T&D operations by addressing conditions identified during T&D patrols. The vegetation management department may also conduct additional patrols.

In addition, vegetation management contractors develop wildfire plans and train their personnel. Vegetation management contractors also adhere to jurisdictional work restrictions and requirements to equip personnel with minimum wildfire tools to safely perform pruning, removal, and other mitigation activities. These proactive measures are implemented in advance of adverse weather conditions to reduce ignition risks and enhance system resilience during periods of heightened wildfire potential.

PacifiCorp considers environmental factors, such as weather, when scheduling vegetation management activities. For example, where possible, work in an area that typically is subject to fire restrictions may be scheduled for earlier in the year before jurisdictional fire restrictions are in effect. Generally, PacifiCorp responds accordingly to forecasted weather events of elevated fire risk, with direction from PacifiCorp's Emergency Coordination Center and Operations. PacifiCorp's Vegetation Management Department also responds to winter storms, wildfires, and other emergencies where vegetation may have been impacted to identify and mitigate risks.

8.2.9 Fire-Resilient Right-of-Ways

When local conditions and property rights allow, PacifiCorp may use integrated vegetation management practices. Integrated vegetation management practices focus on establishing desired vegetation characteristics, such as sustainable plant communities that will be compatible with the electric facilities over the long term. Desired plant communities are stable, low-growing, diverse, and compatible with utility right-of-way. They provide benefits to wildlife, reduce fire risk, and increase accessibility to utility infrastructure. Under such an approach, PacifiCorp may implement applicable control methods, generally chemical (herbicides) and physical (manual or mechanical maintenance), to remove trees and vegetation that could potentially threaten clearance requirements, while encouraging low-growing cover vegetation that will never create clearance issues.

8.2.10 Vegetation Imagery

PacifiCorp explored the use of remote sensing technology in 2025 with the intent to assess the potential it could have to augment and inform traditional vegetation management inspections. PacifiCorp conducted the pilot to evaluate the effectiveness and accuracy of remote sensing technologies, specifically data acquired via satellite, to inform ways in which it may be strategically integrated into PacifiCorp's vegetation management program. Table 8-5 lists the potential use cases that may be further evaluated in the future.

Table 8-5: Potential Use Cases for Remote Sensing Technologies in Vegetation Management

Use Cases	Description
Vegetation Characterization	Characterize the current vegetation status along transmission and distribution lines, specifically identifying and quantifying strike tree potential, tree canopy cover, clear span distances, and deciduous versus coniferous vegetation.
Vegetation Inspections	Conduct inspections of transmission and distribution lines to proactively identify spans with vegetation conditions such as hazard trees, vegetation-to-conductor encroachment, and overhang.
Transmission ROW Planning	Evaluate ability to use remote sensing to assess vegetation current state within transmission ROW to identify maintenance type (mowing, pruning, herbicide, etc.).
Species Identification	Determine the capability of remote sensing technologies to accurately identify and map specific plant species of concern within operational areas.

Use Cases	Description
Risk Analysis	Identify data acquired via remote sensing that may be used to augment risk models.

8.2.11 Vegetation Management Enterprise Systems

PacifiCorp does not own an integrated enterprise system to dispatch and track all vegetation management initiatives. PacifiCorp maintains a database (PacifiCorp Vegetation Management [PVM]) used to track production metrics associated with vegetation management activities. This system is separate from the third-party work management system, which is used in the field during inspection and correction of vegetation conditions.

Vegetation management uses PVM to store production and financial data associated with vegetation management work. The current work management software utilized by PacifiCorp is called MapIt Fast which is managed by a third party. PacifiCorp is transitioning to GeoDigital, a new work management software, with expected implementation in Q1 2026, which will replace MapIt Fast. As GeoDigital's functionality is further developed, it is anticipated that it will also replace PVM at a future date. The work management software uses the GIS data of PacifiCorp's distribution and transmission system, which will be updated annually.

The work conducted on vegetation management initiatives is tracked by work codes, and inspections and correction work are tracked geospatially within the work management software. Metrics tracked include cost and/or production metrics associated with work planned and completed, and who performed the work. Information in PVM is at the circuit level. Vegetation management performs a validation in PVM when invoices are received and reviewed against data contained in PVM.

8.2.12 Vegetation Management – Performance Monitoring

In addition to quality reviews and post-audits, as described in Section 8.2.14, PacifiCorp uses key performance indicators (KPIs) to review vegetation management contractor performance. These KPIs include reviews of production metrics, certifications, and safety. PacifiCorp reviews these KPIs with the vegetation management contractors to drive continuous improvement.

8.2.13 Vegetation Management – Other

8.2.13.1 Tree Voucher Program and Community Outreach

PacifiCorp may provide tree replacement vouchers to customers on a case-by-case basis to offset discretionary removals within or adjacent to the right-of-way. Coupled with this program, PacifiCorp provides information regarding "right tree, right place" strategies to landowners and communities. PacifiCorp participates in community activities such as Arbor Day celebrations to promote "right tree, right place" practices and support community tree plantings.

8.2.14 Quality Assurance and Quality Control

Tracking ID: OR-VM-11

Quality control actions are critical to ensure that vegetation requiring work (pruning and/or removal) is properly identified and that the work is conducted in accordance with vegetation program standards and specifications. PacifiCorp's QC activities include quality reviews and post-audits. The former involves review of part of the completed activity, and the latter may involve a thorough review of the entire project or a sample, as indicated in Table 8-6 below.

8.2.14.1 Quality Reviews

Quality reviews are detailed reviews of a portion of completed work against PacifiCorp's Vegetation Standard Operating Procedure and requirements and are generally conducted by PacifiCorp staff with ISA arborist certification. These reviews may focus on individuals or crews conducting pre-inspection, pole clearing, chemical maintenance, and tree maintenance and may include a review of documentation, work performed, adherence with work practices and workflows, and safety practices.

8.2.14.2 Post-Audits

Post-audits are conducted to review the completed work to ensure it conforms with the required scope and standards. Post-audits are typically conducted by PacifiCorp staff with ISA arborist certification. A third-party auditor is used as needed.

Post-audits typically include:

- Review of routine maintenance (work identified during distribution detailed inspections)
- Review of off-cycle maintenance in HFRZ (work identified during patrol inspections)

Post-audits are generally conducted soon after the vegetation management work is completed at a location to identify any issues before vegetation management crews leave the area for their next work assignment.

Defensible space QA/QC is performed as part of the substation inspection management audits and procedures. Table 8-6 summarizes the vegetation management QA/QC program objectives.

Table 8-6: Vegetation Management QA and QC Program Objectives

Initiative/Activity Being Audited	Sample Size	Quality Program Type	Objective of the Quality Program
Routine Distribution (Detailed)	100%	QC	To ensure contractor pre-inspectors follow Company procedures, to identify trees that were missed, and to identify work that was not conducted in accordance with requirements.
Off-cycle Distribution (Patrol)	100%	QC	To ensure contractor pre-inspectors follow Company procedures, to identify trees that were missed, and to identify work that was not conducted in accordance with requirements.
Off-cycle Transmission (Patrol)	100%	QC	To ensure contractor pre-inspectors follow Company procedures, to identify trees that were missed, and to identify work that was not conducted in accordance with requirements.
Pole Clearing	10%	QC	To ensure work is conducted in accordance with requirements.
Substation Defensible Space	50%	QC	To ensure contractors achieve defensible space around assigned structures according to procedure.

PacifiCorp typically audits 100% of completed maintenance work associated with routine distribution (detailed), off-cycle distribution (patrol), and off-cycle transmission (patrol). PacifiCorp conducts sample audits of pole clearing.

Defensible space QA/QC is performed as part of the substation inspection management audits, typically auditing 50% of substations.

PacifiCorp conducts its quality management actions in accordance with PacifiCorp's Transmission & Distribution Vegetation Management Program Standard Operating Procedures (SOP), Revision 8, dated 8/29/2024. Additional information is found in PacifiCorp's Vegetation Management Quality Management Program Guidelines document, dated 3/04/2025.

Results of quality reviews are used to further gauge quality of vegetation maintenance work conducted by contractors. These results, coupled with post-audit results, help PacifiCorp identify opportunities for improvement and targeted discussions to have with its contracted workforce, including requiring development of corrective action plans to address recurring issues.

8.3 Results

Through 2025 Q3, PacifiCorp has met all of its established inspections targets for the year, while continuing to make progress toward its pole clearing target, distribution subject poles cleared within HFRZ, which is anticipated to be completed by year-end.

8.4 Initiatives and Targets

8.4.1 Initiative Table Summary

In Table OPUC 8-2 PacifiCorp presents its 2026-2028 initiatives and targets in Vegetation Management, which are described further below.

Table OPUC 8-2: Vegetation Management Initiative Cost Summary in Thousands

Initiative Activity	Tracking ID	Target Unit	2026 Target	2026 Forecast ($1,000)	2027 Target	2027 Forecast ($1,000)	2028 Target	2028 Forecast ($1,000)	Three-Year Total ($1,000)	Section
Routine Distribution (Detailed Inspection)	OR-VM-01	Circuit Miles	4,651	[redacted]	4,845	[redacted]	4,707	[redacted]	[redacted]	8.2.1
Off-cycle Distribution (Patrol Inspection)	OR-VM-03	Circuit Miles	2,007	[redacted]	1,912	[redacted]	2,073	[redacted]	[redacted]	8.2.1
Off-cycle Local Transmission (Patrol Inspection)	OR-VM-04	Circuit Miles	285	[redacted]	269	[redacted]	227	[redacted]	[redacted]	8.2.1
Quality Assurance/Quality Control (Vegetation Management)	OR-VM-11	Circuit Miles	N/A	[redacted]	N/A	[redacted]	N/A	[redacted]	[redacted]	8.2.14
Routine Local Transmission (Detailed Inspection)	OR-VM-16	Circuit Miles	563	[redacted]	699	[redacted]	697	[redacted]	[redacted]	8.2.1
Routine Main Grid Transmission (Detailed Inspection)	OR-VM-17	Circuit Miles	1,201	[redacted]	1,201	[redacted]	1,201	[redacted]	[redacted]	8.2.1
Pole Clearing	OR-VM-19	Distribution Poles	35,956	[redacted]	35,956	[redacted]	35,956	[redacted]	[redacted]	8.2.6
Substation Defensible Space (Substation Inspection)	OR-VM-25	Substations	260	[redacted]	260	[redacted]	260	[redacted]	[redacted]	8.2.7

As discussed below in Section 8.5.2, PacifiCorp is implementing a new vegetation management work management system in the first quarter of 2026, and as a result of the implementation, there may be differences in how the circuit miles are calculated in the new system compared to the current system. This may impact reporting of results for initiatives OR-VM-01, OR-VM-03, OR-VM-04, OR-VM-11, OR-VM-16, and OR-VM-17 as the targeted circuit miles were calculated in the legacy system and the actual results will be reported from the new work management system.

8.5 Continuous Improvement

8.5.1 Vegetation Inspections

PacifiCorp has generally increased the frequency of inspections, including transitioning from a four-year to a three-year cycle for distribution, annual inspections of distribution, and transmission in HFRZ, and implementation of non-routine targeted inspections. Through these efforts, PacifiCorp has experienced fewer vegetation conditions, such as vegetation within the minimum clearance distances identified in OAR 860-024-0016 – Minimum Vegetation Clearance Requirements.

8.5.2 Vegetation Management Enterprise Systems

As discussed in Section 8.2.11, PacifiCorp is transitioning to a new work management software system in the first quarter of 2026. It is expected that this new system will provide better data integrity, improving the processes PacifiCorp uses for tracking tree maintenance work being conducted in the field by contractors. Additionally, with the implementation of the new work management software, PacifiCorp will prioritize work at the unit level. Work units, such as vegetation removals, will be assigned a "priority level" by the inspector, as applicable, corresponding to a targeted timeframe in which the corrective actions are to take place.

9. Situational Awareness and Forecasting

9.1 Overview

While situational awareness is a year-round endeavor, PacifiCorp expressly defines fire season by delineating geographic areas of the Company's service territory using rolling historical analysis of meteorological data. These geographic regions are divided east and west of the Cascade Mountain Range. Despite this formal definition, it is not inclusive of all potential wildfire events, as a conflagration can occur at any period outside of this range depending on antecedent conditions.

PacifiCorp uses a combination of tools, analysis, and maps layered with a risk driver analysis to inform strategic asset inspections, vegetation management practices, and long-term system hardening solutions. However, as climate and weather patterns change, extreme weather events are predicted to become more frequent, and the potential exists for seasonal, dynamic, and/or isolated risk events to occur that compound or deviate from this baseline risk. Therefore, having an additional dynamic risk model grounded in situational awareness is pertinent to ensure electric utilities know when, where, how, and why to take enhanced action to mitigate the risk of wildfire. PacifiCorp's approach to situational awareness includes acquiring data to forecast and assess the risk of potential or active events to inform operational strategies, respond to local conditions, and drive decision-making. These key components are leveraged to inform risk-based system operations and work practices as discussed in the sections below.

9.2 Mitigations

9.2.1 Environmental Monitoring Systems

9.2.1.1 Existing Systems, Technologies, and Procedures

Table 9-1 below lists the environmental monitoring systems PacifiCorp uses.

Table 9-1: Environmental Monitoring Systems

System	Measurement/ Observation	Frequency	Purpose and Integration
Microstation	Temperature, Humidity, Wind Speed & Gust, Wind Direction, Rainfall	10 min	Improve weather modeling and forecasts, improve real-time weather data, and inform operational decisions.
RAWS	Temperature, Humidity, Wind Speed & Gust, Wind Direction, Rainfall, 10-hour Dead Fuel Moisture	10 min	Improve understanding of fuel moisture near infrastructure, weather forecasts, and real-time situational awareness in remote locations
Portable Stations	Temperature, Humidity, Wind Speed & Gust, Wind Direction, Rainfall	5 min	Deployed as needed in areas where additional weather data is necessary to temporarily increase weather data granularity for situational awareness.

Tracking ID: OR-SA-01, OR-SA-15

PacifiCorp owns and operates a network of weather stations, most of which collect data and provide an observation of temperature, humidity, wind speed, wind direction, wind gusts, and accumulated rainfall every 10 minutes. All weather stations are calibrated and receive maintenance, if necessary, annually to ensure data accuracy and reliability. PacifiCorp uses three different types of weather stations throughout its territory:

1. **Microstations** are installed directly on the utility infrastructure, distribution poles, or transmission poles. They are the most common type of station used in the weather station network. In addition to measuring raw weather variables, microstations calculate other variables such as dew point and vapor pressure deficit, which are both functions of temperature and relative humidity.
2. **Remote Automatic Weather Stations (RAWS)** can be installed in remote locations on a tripod structure. In addition to the weather parameters collected by the microstations, RAWS collect fuel moisture data.
3. **Portable stations** collect data at five-minute intervals and are sent to the vendor annually for calibrations and maintenance. Portable weather stations are readily available for deployment in the event of extreme weather conditions or may be deployed as temporary data collection points at high-priority locations where future microstations are scheduled to be installed to provide better granularity to the weather data collected.

Weather station locations are prioritized by several factors and are not limited to the HFRZ. These factors include terrain complexity, fuel types, climatology, and in some cases, proximity to protective devices and population centers. Existing constraints may limit the ability to install weather stations in areas that meet favorable conditions. Examples include lack of bucket truck access, existing equipment on infrastructure, and large obstructions such as buildings or dense canopy coverage that could compromise wind data and limit the amount of sunlight to charge the weather station's batteries.

Locations are mainly selected based upon:

- **Terrain type:** In areas of significant terrain complexity, the intent is to sample data from diverse terrain features on each circuit to capture as many terrain flow enhancement scenarios as possible. For example, if a weather station is already sited in a valley or canyon floor, efforts may be made to find a location on the same circuit or nearby on another circuit that is more representative of conditions on a peak or ridgeline.
- **Existing weather station locations and data intervals:** While siting weather station locations, Meteorology will check maps of weather station data from publicly available sources to see what kind of data is already available in the area. If possible, Meteorology will site locations far away from or in dissimilar terrain than publicly available weather stations. However, if a publicly available weather station shows a history of errors, long periods of downtime, or a data collection interval that is too long for the data to be useful in a PSPS event, PacifiCorp might install a weather station adjacent to it.
- **SME assumptions of most extreme conditions:** Meteorology typically prioritizes areas where the terrain is more likely to significantly enhance winds on a circuit. In some cases, this may be a ridgeline/peak, a longer straightaway within a canyon where wind can channel, or an area where Meteorology suspects down-slope winds might be a concern.
- **Bucket truck access.:** Using satellite imagery, pole pictures, and Google Street View, Meteorology sites locations along roads, logging roads, or in easy-to-access offroad areas near roads that bucket trucks could reach.
- **Whether nearby obstructions may interfere with the quality of data:** Using satellite imagery and pole pictures, Meteorology tries to identify a pole with minimal obstructions nearby such as tall trees or buildings that could interfere with wind observations.

Both microstations and RAWS weather stations are fixed location. Portable weather stations are sited for use during PSPS events but are only used during the events and then removed and stored for when they are needed again.

Figure 9-1 below shows the Oregon locations of PacifiCorp weather stations, in addition to stations operated by the National Weather Service (NWS) and the Oregon Department of Transportation (ODOT), as well as RAWS that are not owned by PacifiCorp but visible to the Company. Weather station data is available to the public, public safety partners, and others at PacificPowerWeather.com.

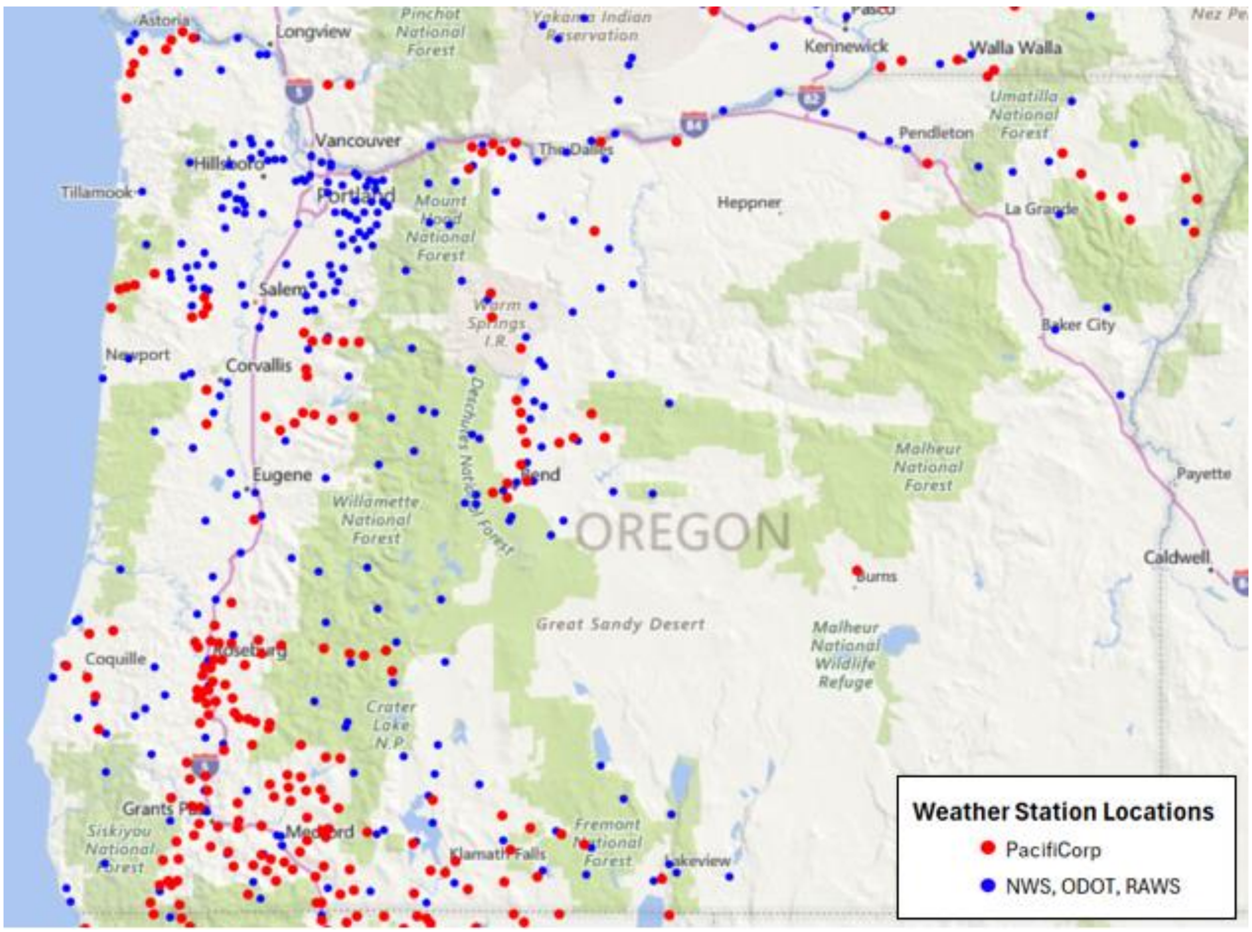


Figure 9-1: Locations of Fixed-Location Weather Stations in Oregon

9.2.1.2 Weather Station Maintenance and Calibration

Tracking ID: OR-MA-01

Accurate weather station data is critical to precise weather modeling and sound decision-making. PacifiCorp performs annual weather station maintenance and calibration to ensure each of its weather stations is operational and reporting accurate data. PacifiCorp's three weather station types (as described above) require different maintenance. Annual calibration begins in spring and is typically complete by the end of July. However, weather conditions may make roads impassable until late spring or early summer, which can delay work.

PacifiCorp has not established an acceptable weather station outage percentage. If a weather station is not working and conditions are forecast for a potential PSPS event, PacifiCorp will look for alternatives to ensure there is adequate weather station coverage, including requesting the weather station vendor expedite maintenance, deploying portable weather stations, or using publicly available weather station data from other organizations. Where PacifiCorp's weather station data is unavailable and potential PSPS conditions are forecast, the Company will proceed cautiously and prioritize public safety.

9.2.1.3 Evaluation and Selection of New Systems

PacifiCorp currently operates both microstations and RAWS, as described above. While the Company is open to new technologies, at this time, no other environmental monitoring systems are being considered. Generally, when deciding on new technologies, the Company evaluates the limits of the sensors and the types of data they collect, along with installation and maintenance requirements. The data collected must integrate with existing systems and offer something unique that existing weather station equipment does not. Thus far, PacifiCorp has not found additional or new technology options that can do so.

9.2.1.4 Evaluating Activities

Utilizing the data from 2025, Meteorology is exploring ways to standardize how it fills data gaps within its existing weather station network for 2026 and 2027. This may include prioritizing locations that lack weather station data within a defined radius of zones of protection, which fall into different risk categories based primarily on terrain and vegetation. Radius distance may depend on varying geographical continuity to ensure adequate sampling for wildland areas of uniform terrain, such as flat basins. This may also include adding more weather stations along longer circuits with multiple protective devices in areas of highly complex terrain, to enable more precise planning and improved situational awareness before a PSPS event.

9.2.2 Fire Potential Index

Tracking ID: OR-SA-06

PacifiCorp's Fire Potential Index (FPI), developed by Technosylva, provides a comprehensive analysis of the fire potential across PacifiCorp's service territory based on fuels, terrain, wind, and aridity. The fuels metric includes the fuel complexity, which is available within Wildfire Analyst Enterprise (WFA-E), as discussed in Section 9.2.5.2. This includes fuel type, fuel load, and fuel age. The Terrain Difficulty Index quantifies the potential impacts terrain can have on suppression activity, including accessibility, fuel penetrability, and ease of opening fire line. The wind metric includes wind speed, both sustained and gust, and dead fuel moisture content. Aridity, another function of the FPI, quantifies the contribution of atmospheric conditions, including relative humidity and vapor pressure deficit. The resultant value from these inputs yields a range of categories from very low to extreme. Figure 9-2 below represents a graphical depiction of Technosylva FPI inputs.

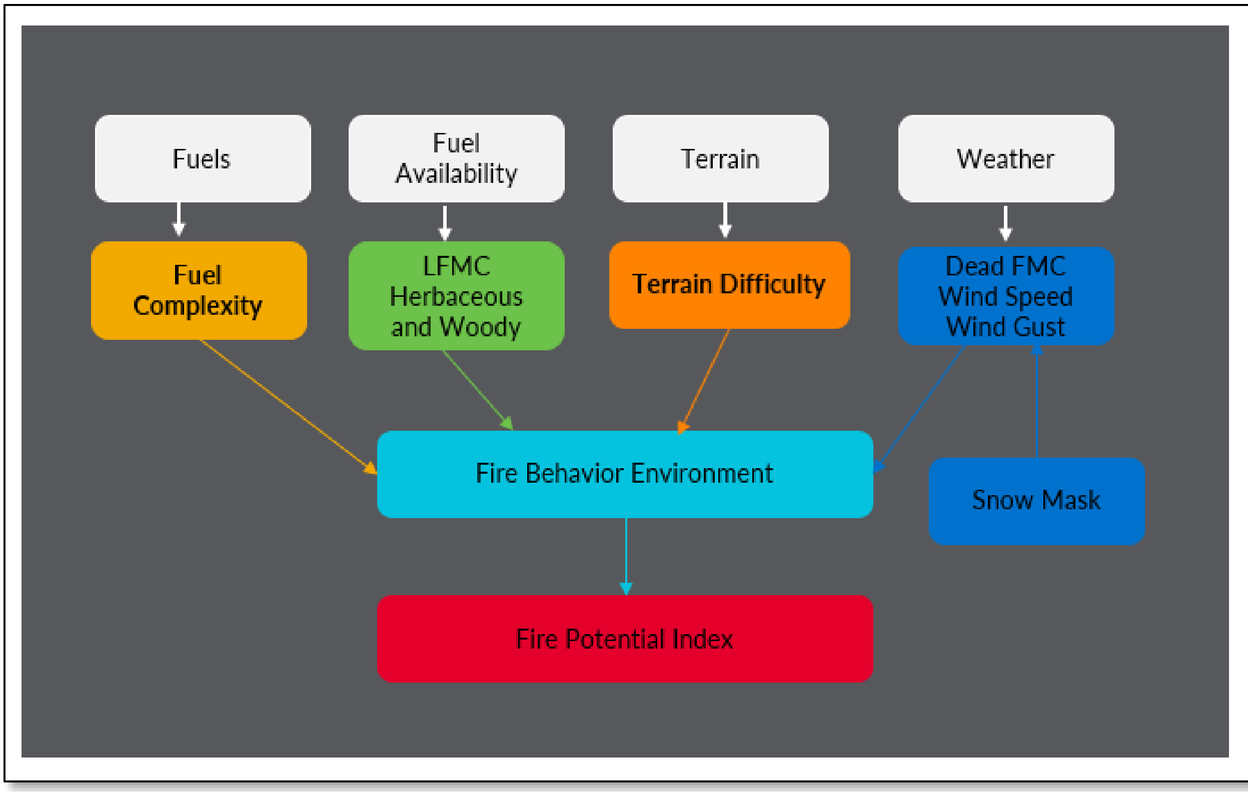


Figure 9-2: Technosylva FPI Inputs

9.2.2.1 Existing Calculation Approach and Use

PacifiCorp uses the Technosylva FPI in combination with other information to assign a district-level wildfire risk. Additional fire potential metrics are used, including publicly available fuels information, terrain and fuels metrics, and weather forecast data. Wildfire risk is expressed using a four-color-code scheme with general inputs to indicate the level of fire potential existing at a district level, from non-fire season to extreme.

Table 9-2 lists the FPI features. The "N/A" denotes where the altitude, spatial, or temporal granularity is not pertinent to the feature group.

Table 9-2: Fire Potential Index Features

Feature Group	Feature	Altitude	Description	Source	Update Cadence	Spatial Granularity	Temporal Granularity
Weather	Wind, sustained and gusts	10 m	Wind speed and gust measured	Internal PacifiCorp WRF	Twice daily	2 km	Hourly
Fuel Complexity	Fuel type, fuel load, and fuel age	Surface	Quantifies the fuel type, fuel load. and fuel age	Technosylva	Annually	30 m	N/A
Weather	Relative humidity, vapor pressure deficit	Surface	Moisture variable from the atmosphere	Internal PacifiCorp WRF	Twice daily	2 km	Hourly
Terrain	Terrain Difficulty Index	N/A	Quantifies the terrain and its potential impacts on suppression activity, including accessibility, fuel penetrability, and ease of opening fire line	Technosylva	Annually	30 m	N/A
Fuel Moisture	1 and 10 hour dead fuel moisture	10 m	Moisture of dead fuels	Internal PacifiCorp WRF	Twice daily	2 km	Hourly
Fuel Moisture	Woody and Herbaceous Live Fuel moisture	10 m	Moisture of live fuels	Remote Sensing data	Daily	2 km	Hourly

Meteorology performs a review of fuels and fire weather forecasts and observations, including by using some or all of the additional metrics and methods listed below when increasing the wildfire potential risk to elevated, significant, or extreme.

- **Fire Weather Conditions:** This includes National Weather Service Fire Weather Watches and Red Flag Warnings, publicly available weather model data, and fire weather and NFDRS outputs from PacifiCorp's WRF model.
- **Fire Weather and Drought Indices:** This includes the Hot-Dry-Windy Index and the Evaporative Demand Drought Index (EDDI).
- **Wildfire Risk:** This includes an assessment from FireRisk of the potential for extreme fire behavior and consequence should an ignition occur. Live and dead fuels moisture conditions inform the risk.

- **Fuels Conditions:** This includes a more detailed assessment of live fuel moisture (herbaceous and woody), dead fuel moisture, grassland curing, and tree mortality.
- **Fuels and Fire Behavior Advisory:** These advisories are issued by the Geographic Area Coordination Center (GACC) when abnormal fuels conditions and/or fire behavior poses a threat to firefighters and public safety. The combination of exceptionally dry fuels and excessive tree mortality is an example of conditions that could prompt the issuance of a Fuels and Fire Behavior Advisory.
- **Current Wildfire Activity:** Current wildfire activity in or near a district can indicate that the weather and fuels conditions are contributing to fire occurrence and spread. This information provides insight into how a new fire may behave. Additionally, initial attack on a new fire may be impacted by resource availability due to ongoing wildfires in the region.
- **Normalized Differential Vegetation Index (NDVI):** A numerical indicator used to measure and monitor vegetation health and density. It is derived from remote sensing data, typically captured by satellites or drones. This data is both publicly available and observed within PacifiCorp's NDVI machine learning model.

The district-level wildfire risk is made available to the Company via the System Impacts Forecast Matrix, a five-day forecast product issued daily by the Meteorology team. As demonstrated below in Figure 9-3, the district-level wildfire risk is shown in the "F" columns and the "Wx" columns represent the weather-related outage potential of the System Impacts Forecast Matrix.

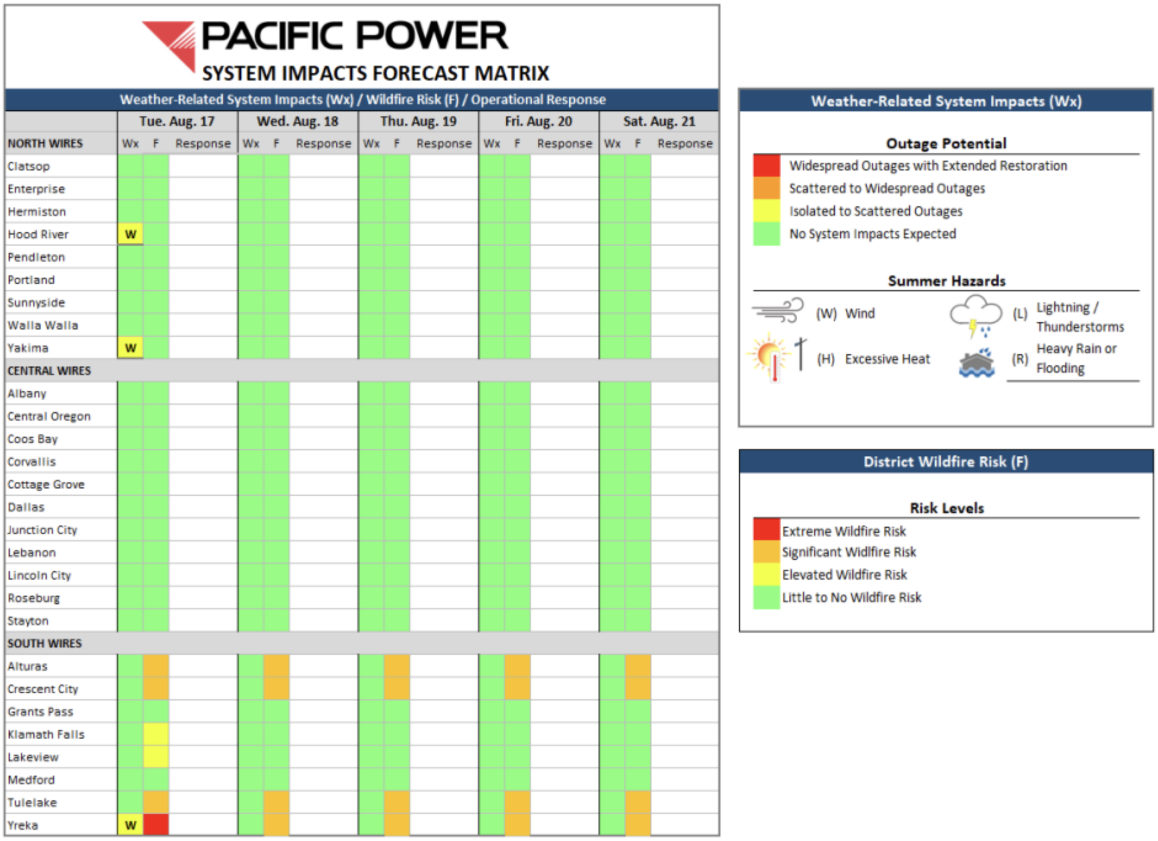


Figure 9-3: Example System Impacts Forecast Matrix

This matrix is used to inform operational strategies, weather condition responses, and decision-making, including whether to activate a PSPS. For a discussion of how PacifiCorp uses its System Impacts Forecast Matrix to modify operational practices, see Section 10.2.3. To understand how this matrix is used to inform modifications to system operations, such as implementing ESS settings, see Section 10.2. For more details regarding the impact of this matrix on assessing the potential for PSPS, see Section 12.1.

9.2.2.2 Known Limitations of Existing Approach

The FPI discussed in Section 9.2.2.3 below, in combination with detailed analysis of the historical WRF reanalysis and wildfire history, will help enable PacifiCorp to quantify daily fire potential. Known limitations include the inability to correlate how the FPI values relate to a specific location's historically dry fuels and weather variables.

9.2.2.3 Evaluating Activities

PacifiCorp plans to work closely with Technosylva to continually improve FPI outputs to supplement other wildfire risk products. The FPI model currently quantifies the potential for large or consequential wildfires out several days based on weather, fuels, and terrain inputs. To accomplish this, Technosylva performed a detailed analysis of past weather from PacifiCorp's WRF reanalysis, satellite-derived hotspot data from the Visible Infrared Imaging Radiometer Suite (VIIRS), and other environmental data. PacifiCorp plans to develop a percentile-based FPI for each of the districts across the Company's service territory. This will enable the utility to assess what an extreme FPI will mean from a locality and historical aspect.

9.2.3 Grid Monitoring Systems

PacifiCorp continues to expand its grid monitoring capabilities to quickly identify system faults and their location. This work helps to support restoration efforts. Monitoring systems are also providing analytics collected from monitoring technologies to determine their accuracy in detecting faults, identifying anomalies, and supporting proactive grid management. Insights gained from performance reviews and stakeholder feedback are used to refine implementation strategies and enhance system capabilities. Advanced analytics and predictive modeling tools are being developed to optimize the deployment and effectiveness of monitoring technologies.

Discussion of the grid monitoring systems and how they are used is below. Installation of the monitoring systems is discussed in Section 6.2.5.

9.2.3.1 Existing Systems, Technologies, and Procedures

Table 9-3 shows PacifiCorp's grid operation monitoring systems. These include both CFCI distribution and early fault detection sensors, and circuit breaker/recloser monitoring.

Table 9-3: Grid Operation Monitoring Systems

System	Measurement/ Observation	Frequency	Purpose and Integration
Line Sensor: CFCI Distribution (≤35 kV)	Current, eField, Conductor Temperature / Fault current magnitude, Oscillography	Fault current magnitudes captured and oscillography by condition-based thresholds. 5-min to hourly interval logging current, eField and conductor temperature parameters	Fault locating/restoration and precursors support zone-based patrol and predictive location modeling with short circuit analysis. Interval data: supports load flow engineering studies. Integrations: EMS/SCADA, Pi Historians, Web dashboard.
Line Sensor: Early Fault Detection	Partial discharge, time-synchronized high-frequency RF emissions (nano-joules), coupled to transmission lines/RF source location/distance from measurement point and intensity	Once per second	Detection of localized defects in overhead insulators and conductors, baselining line characteristics and change detection. Integrations: Web dashboard and email alerts.
Circuit Breaker/Recloser Monitoring: SCAN	Current, Voltage / Relay fault current magnitudes, breaker operation, event based COMTRADE files, and sequence of event records	Fault current magnitudes and event reported upon occurrence. Continuous retrieval of sequence of event records.	Fault locating/restoration and precursors: predictive location modeling with short circuit analysis. Analysis of protective device coordination and event pre-cursers Integrations: EMS/SCADA, Pi Historians Web dashboard

Line Sensors: CFCI Distribution (≤ 35 kV)

Tracking ID: OR-SA-07

In Oregon, PacifiCorp operates an installed fleet of over 2,800 communicating fault circuit indicator (CFCI) distribution sensors, with over 700 installed in 2025. The CFCIs are conductor-mounted sensors with embedded communications modules. These modules monitor conductor current and electric field intensity, and they trigger alarms when fault currents or system outages occur due to loss of electric field.

Integration of CFCIs with the Company's broader system is depicted in Figure 9-4. The sensor management platform facilitates device configuration, status monitoring, archival of interval time-series data, fault event classification, and reporting to corporate and control center users. Corporate access enables engineers and operations personnel to retrieve fault targets, oscillography, and sequence-of-event data. Personnel can subscribe to email alerts based on districts and circuits of interest. Control center integrations include device status and alarming of fault events, root mean square (RMS) current fault targets in energy management system (EMS), and distribution management system (DMS) applications.

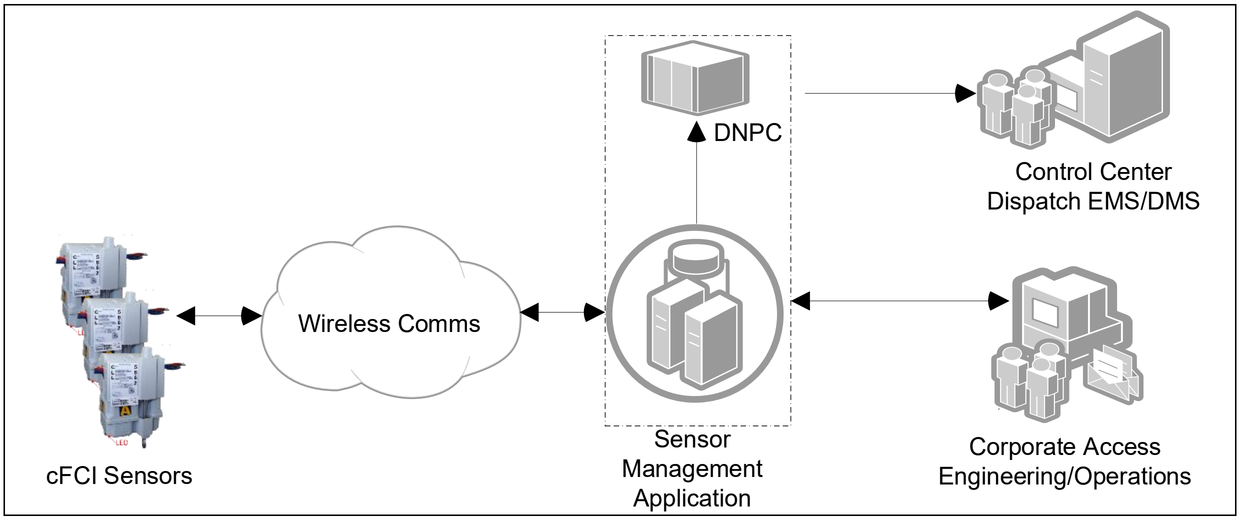


Figure 9-4: Distribution CFCI Systems Integration

CFCI sensor fault event triggers are used in zone-based fault locating; RMS current fault targets and oscillography records are used in fault locating with short-circuit analysis and assessment of protective device coordination.

Line Sensor: Early Fault Detection (EFD)

Tracking ID: OR-SA-02

PacifiCorp employs an early fault detection (EFD) sensor fleet to enhance monitoring and risk mitigation across its transmission system. The EFD sensor fleet detects high-frequency radio frequency (RF) emissions. RF source locations are then calculated as a distance from measurement points using precise global positioning system (GPS) timing, and potential correlations with Company assets are assessed by analyzing RF pulse intensity and occurrence patterns. In the frequency spectrum, monitored RF sources correlated to electrical equipment may indicate partial discharge activity related to localized breakdown of insulators or other electrical equipment. Early detection, inspection, and corrective measures taken at these locations may prevent faults and associated ignition risks.

PacifiCorp is in the process of baselining information from the EFD system and developing systems and procedures for data analysis and field inspections. Data and alerts from the platform are monitored by engineers, and high-detection sites are flagged for off-cycle inspection. EFD sensor locations, transmission line route, and HFRZ are shown in Figure 9-5.

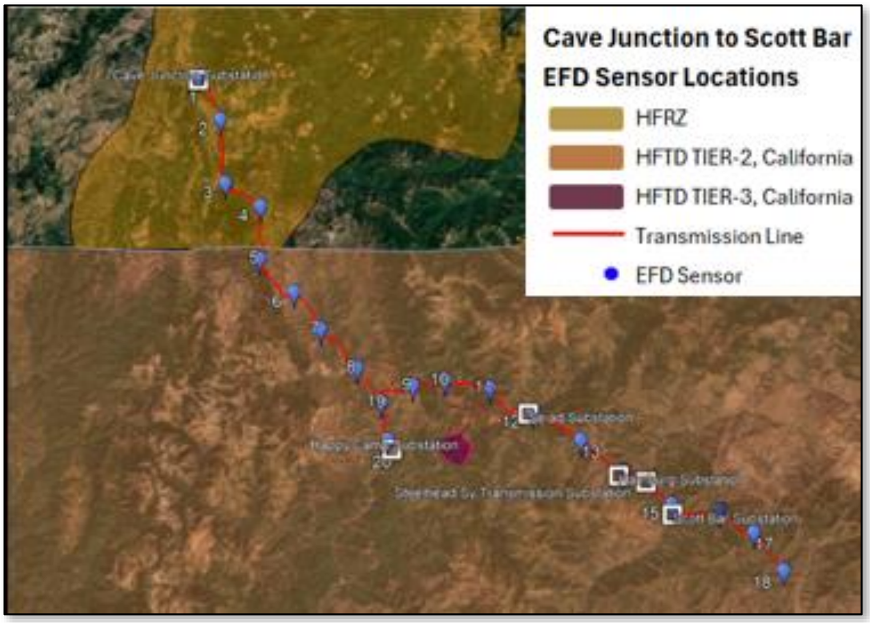


Figure 9-5: EFD Sensor Locations and Transmission Line Route

Example data from the EFD platform is shown in Figure 9-6. The cluster chart depicts cumulative partial discharge pulse-count and relative energy versus the distance detected between two EFD sites, #13 and #14, with a predicted electrical defect near transmission pole #10/16.

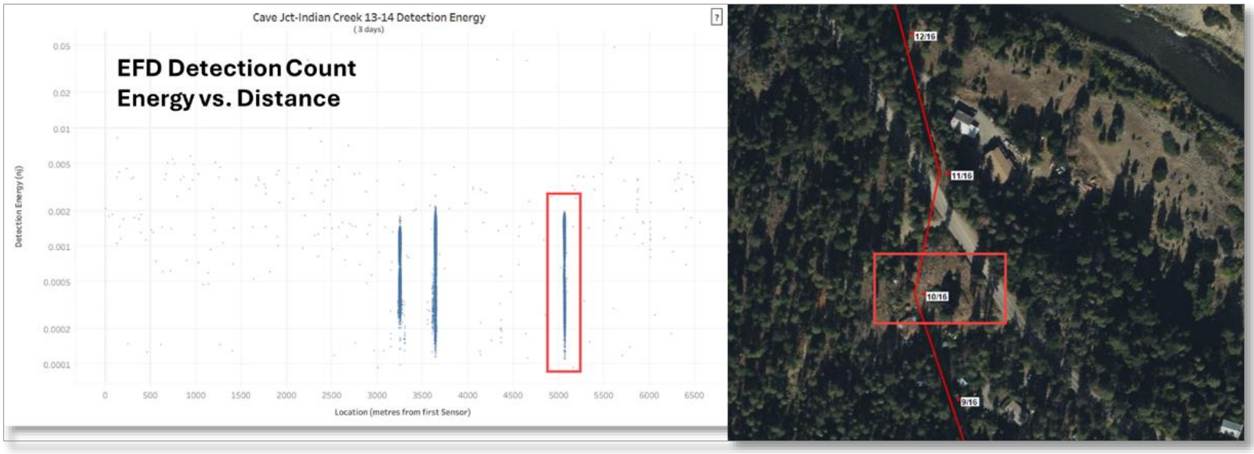


Figure 9-6: EFD Web Portal Example Data

Circuit Breaker/Recloser Monitoring: SCAN

Tracking ID: OR-SA-08

PacifiCorp's substation control advanced network (SCAN) automatically retrieves and archives enriched event data from protective relays. The data collected includes sequence of event logs and COMTRADE event files associated with breaker operations, overcurrent faults, and high-impedance faults. Files and logs collected by the system are generally available to control center engineers within a few minutes of an event occurring, enabling in-depth analysis including classification of fault types, fault magnitudes, and probable locations determined through analysis with impedance models. The data also can help assess the performance of protective settings and provide early indication of high-impedance fault events.

Distribution Protection Settings Review

Tracking ID: OR-SA-09

In 2025, PacifiCorp began a Distribution Protection Settings Review process on reclosers and substation circuit breakers. The review process programmatically looks at individual relay settings to determine if the settings meet the most recent settings guidelines. A gradually changing system and updates to settings guidelines warrant a need for periodic review. If the review determines a relay setting needs updating, a new setting is created and issued using the most recent guidelines. These most recent guidelines consider the capability of the relay and recommend an updated ESS setting for each individual device reviewed.

9.2.3.2 Evaluation and Selection of New Systems

As part of wildfire mitigation efforts, grid monitoring technologies are systematically assessed to enhance situational awareness, detect faults, and reduce ignition risks. Various grid monitoring technologies, including advanced sensors, distributed fault detection systems, and remote sensing tools, are reviewed to determine their effectiveness. Factors such as accuracy, reliability, feasibility of deployment, integration capabilities, and cost-efficiency are considered during the selection process.

Before full-scale implementation, selected technologies are tested in pilot programs to evaluate their performance under different environmental conditions. Data gathered from these pilot programs inform decisions regarding broader deployment strategies. Efforts are made to ensure that new monitoring systems are compatible with existing grid infrastructure, including SCADA systems and wildfire risk modeling tools.

9.2.3.3 Evaluating Activities

Initiative activities related to grid monitoring technologies are evaluated to assess their effectiveness in enhancing wildfire mitigation efforts. PacifiCorp follows a structured approach to ensure deployed technologies meet performance expectations and contribute to grid resiliency.

Data collected from monitoring technologies is analyzed for accuracy in detecting faults, identifying anomalies, and supporting proactive grid management. Insights gained from performance reviews and stakeholder feedback are used to refine implementation strategies and enhance system capabilities. The Company is developing advanced analytics and predictive modeling tools to optimize the deployment and effectiveness of monitoring technologies.

9.2.4 Ignition Detection Systems

9.2.4.1 Existing Ignition Detection Sensors and Systems

A fire may become catastrophic within minutes, and by implementing advanced wildfire detection technologies, PacifiCorp can respond quickly to support wildfire-reactive responses to ignition. Using wildfire cameras to enhance situational awareness, as well as implementing fire modeling software solutions, particularly those with AI/machine learning capabilities, has the potential to:

- Speed up fire detection time and reduce destruction to both environment and property.
- Provide PacifiCorp emergency management and first responders with another set of tools to monitor fire progression and coordinate response efforts that may include field response, evacuations, PSPS, and property protection.

High-Definition Cameras

Tracking ID: OR-SA-04

In 2023, PacifiCorp partnered with Portland General Electric to collaborate on the effectiveness and future applicability of this technology. In 2024, PacifiCorp installed and activated its own five high definition (HD) camera systems in the Company's Oregon service territory. Figure 9-7 shows the location of these HD cameras.

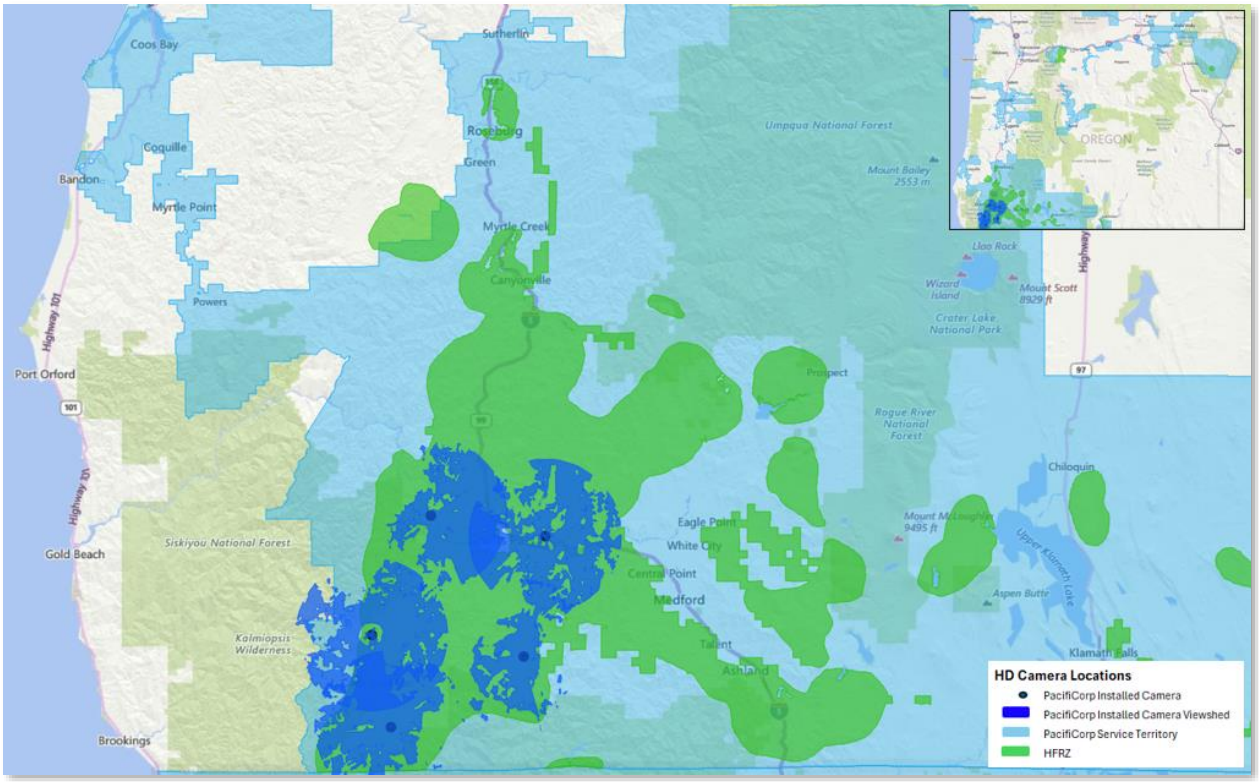


Figure 9-7: High-Definition Camera Installation Locations

Camera feeds are transferred to the cloud via a secure, redundant network to ensure maximum network availability for camera data transfer. Camera data is also constantly fed into a vendor owned and hosted AI model for training purposes. When the AI model detects smoke, the image is sent to the cloud. Alerts are then sent to a human monitor, who determines whether the detection is a false positive or a confirmed ignition. Human review of every detection helps validate AI performance and ensure alert relevancy. The process for the detection of ignitions is indicated in Figure 9-8 below.

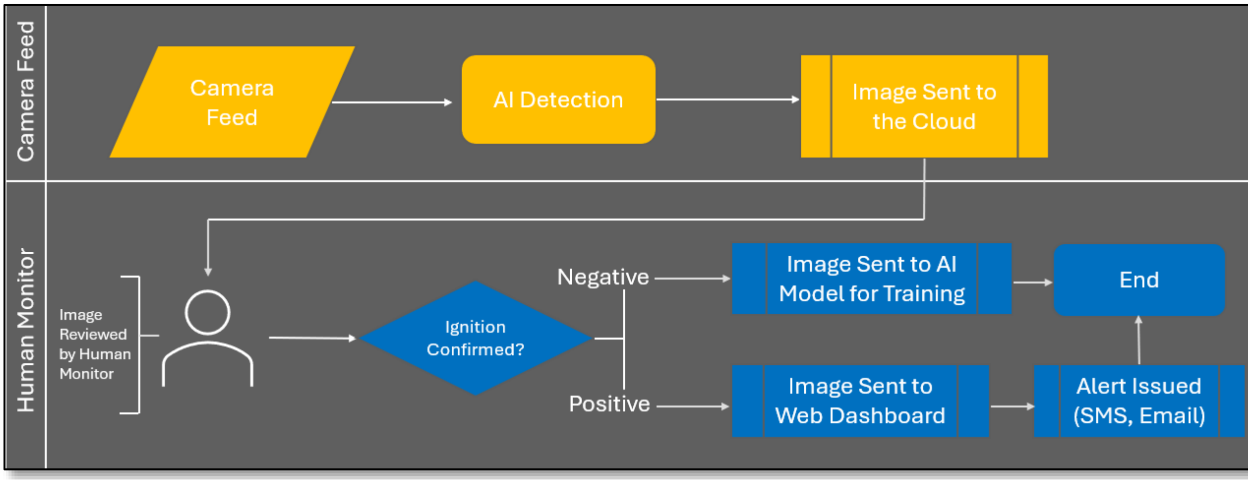


Figure 9-8: HD Camera Data Flow Diagram

9.2.4.2 Evaluation and Selection of New Ignition Detection Systems

PacifiCorp reviews and evaluates its camera network to determine if new cameras are warranted. For example, when a gap is identified, PacifiCorp evaluates whether the area would benefit from camera coverage. Examples include rural areas that are more susceptible to fire. When PacifiCorp identifies such areas, it identifies possible camera locations (e.g., on fire lookout towers, existing communication structures, etc.). The Company then completes a full viewshed analysis to determine whether the location provides adequate coverage of the area. A site survey is then completed, and the camera supplier develops an installation estimate. The general process is shown in Figure 9-9 below.

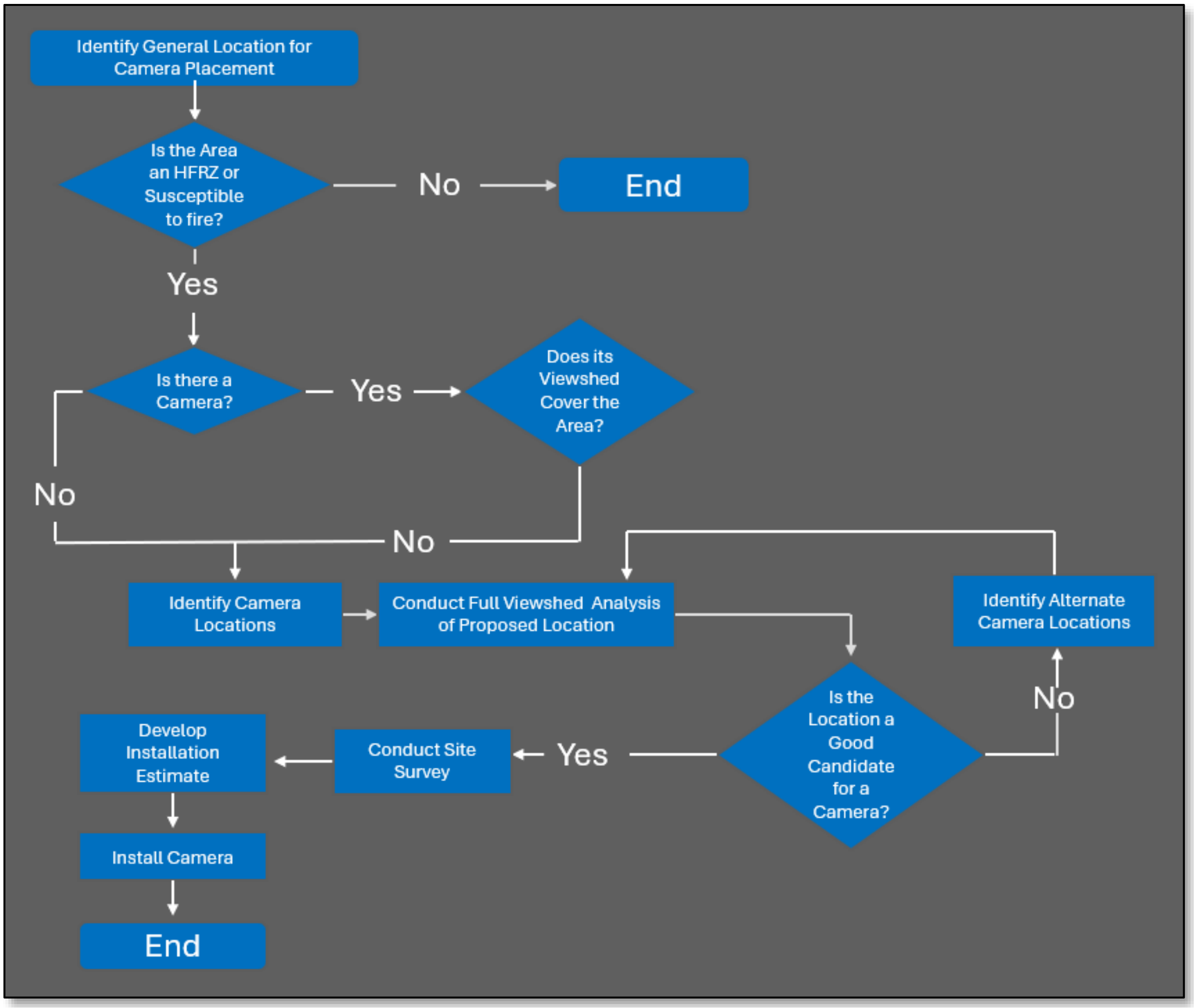


Figure 9-9: Camera Placement Methodology

9.2.4.3 Evaluating Activities

To evaluate the success of existing cameras and their placement, PacifiCorp is monitoring:

- Purpose and Use of Camera-Based Detection: Camera-based detection is intended to supplement other notification and reporting mechanisms by improving timeliness and decision quality through rapid visual confirmation, refinement of incident location, and delivery of incident intelligence, particularly in remote areas where public reporting may be delayed. Early detection is significant because small fires may escalate rapidly, and reductions in detection and confirmation time are consistently identified as a key factor associated with improved outcomes.

In some areas, camera deployments are not possible due to permitting and land ownership considerations.

- **Pre 911 Detections and Time Difference:** The pre 911 detection measurement is most meaningful when interpreted in light of reporting bias, including population density, localized wildfire dispatch practices, and public reporting patterns. Where the pre 911 time advantage is consistently minimal in high-population areas, such results do not necessarily indicate a deficiency in the camera program and may instead reflect that public reporting in those areas is already sufficient Where the same metric is consistently limited in remote or elevated risk corridors, such results may indicate a need to improve viewsheds, increase overlap, or refine alert routing so that detections are received and prioritized at an earlier time.
- **Internal Feedback and Continuous Improvement**: Internal observational feedback is used as a continuous improvement mechanism. Where users report delayed alerts, excessive false positives, or reduced trust in detections, such items are incorporated into vendor feedback, workflow updates, and evaluation of additional methods to provide incident assessment and detection capability for areas not currently served by camera deployments.
- **Location Accuracy and Triangulation:** Location accuracy improves when multiple camera systems are available for the same smoke column, enabling multi-angle confirmation and triangulation. Single camera estimates may improve through artificial intelligence; however, multi-camera triangulation provides a more reliable basis for initial mapping and scaling response. A camera that is not optimal for early detection may be necessary within a coverage area to enable triangulation and reduce uncertainty.
- **Program Maturity and Reporting Limitations:** Certain comparative analytics, including systematic comparisons of response time distributions between camera-detected and non-camera-detected incidents and structured reviews of false negatives, depend on mature data pipelines and consistent tagging across platforms. PacifiCorp is continuing to enhance reporting tools and data practices so that these evaluations can be produced on a more routine basis. With the establishment of the Wildfire Intelligence Center (WIC), which is discussed in Sections 11.2.2,

11.3, and 11.5.1, additional analytics are increasingly feasible and are being tracked to support performance assessment.

PacifiCorp will be expanding its reporting metrics further in the first quarter of 2026 with insights from the WIC to aid in the continued analysis of the benefits that existing camera systems provide the Company.

9.2.5 Near-Term Risk Modeling

9.2.5.1 Wildfire Fuel and Terrain Polygons

In 2025, PacifiCorp modified its short-term forecasting process by grouping areas of similar vegetation height and terrain into polygons using a land cover data layer to guide subject matter expert review. Various data sources, including internal pole pictures, satellite views of terrain and vegetation, and the Multi-Resolution Land Characteristics (MRLC) Consortium dataset, were used to understand the terrain and vegetation for a given location. Vegetation was categorized as either "tall" or "short," based on whether it was tall enough to potentially interfere with poles or lines. Terrain was categorized as either "flat" or "steep," based on whether it was steep enough for fire to spread rapidly in the absence of wind. The datasets are listed in Table 9-4 below.

Table 9-4: Polygon Datasets

Feature Group	Description	Spatial Granularity (meters)	Temporal Granularity	Data Vintage	Source
MRLC Consortium	Landcover dataset to assist is determining vegetation type, density and coverage	15	N/A	N/A	https://www.mrlc.gov/
Pole Pictures	Internal asset photos that show vegetation and terrain type	N/A	N/A	N/A	Internal PacifiCorp GIS
Google Earth	GIS viewer publicly available to see vegetation and terrain type	15	N/A	N/A	http://earth.google.com

Following this methodology, the service territory was divided into the following categories, with the specified colors as they appear on a polygon map:

- Tall vegetation – steep terrain (Red)
- Tall vegetation – flat terrain (Orange)
- Short vegetation – steep terrain (Yellow)
- Short vegetation – flat terrain (Green)
- Low risk (Blue)

An example polygon map for Oregon is shown below in Figure 9-10.

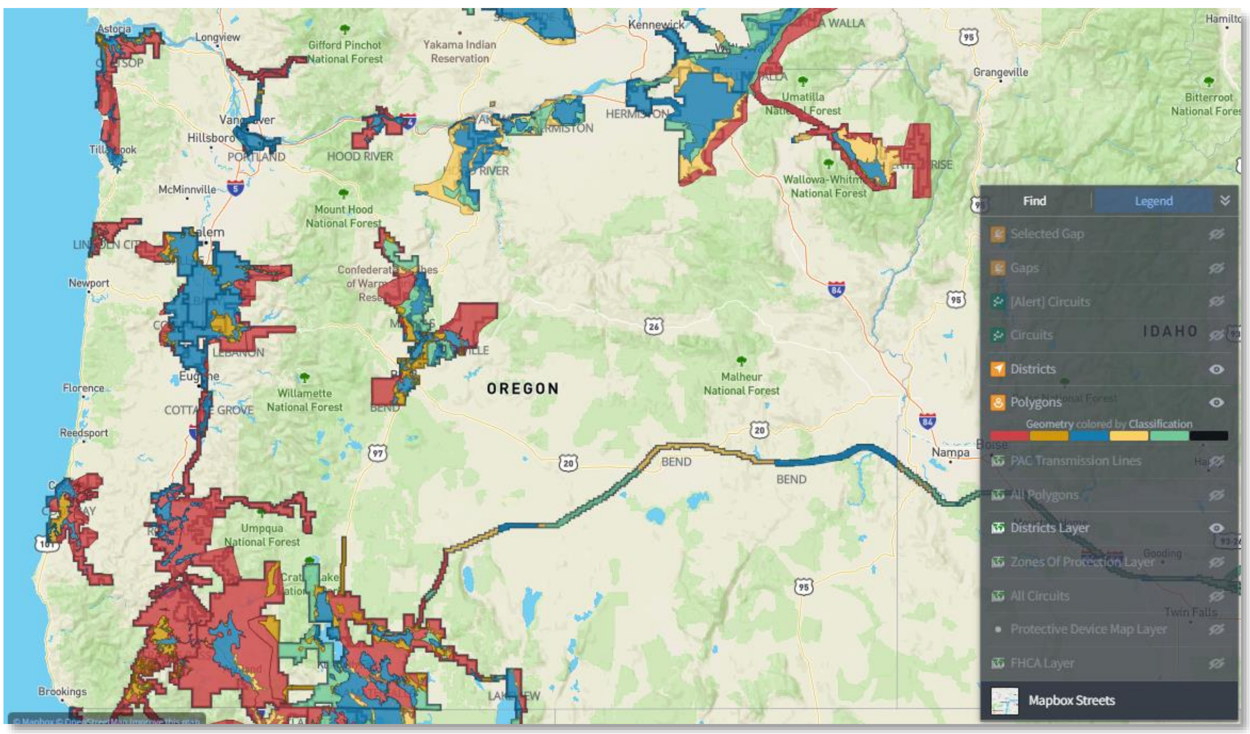


Figure 9-10: Example of a Polygon Map for Oregon

Using these polygons, PacifiCorp is able to produce more precise short-term risk-based forecasts, which help inform operational postures during fire season, as described in Sections 10.2.1 and 10.2.3. This streamlined process helps forecasters to be more surgical in forecasting for high-elevation areas where risk may be lower than in adjacent low-elevation areas due to lingering snow or wetter conditions. This process was initially implemented in 2025 and will continue to evolve as the Company reviews its efficacy.

9.2.5.2 Wildfire Analyst Enterprise

Tracking ID: OR-SA-11

Another item in PacifiCorp's toolbox is the Wildfire Analyst Enterprise (WFA-E), which includes two fire models: FireRisk and FireSim. PacifiCorp uses these models to inform current and near-term weather forecasts and to better understand the impacts of potential ignitions. FireRisk performs millions of wildfire simulations daily across the Company's six-state service territory to assess the energy release risk in any given area. The output is combined with a subset of distribution and transmission asset data to provide asset-specific wildfire risk and consequence forecasts. FireRisk provides a 126-hour forecast to identify the risk of wildfire within that period, the location of the risk, and where the greatest consequence will be if there is a wildfire. FireRisk also supports comparisons between forecast conditions and historical conditions in the operational area.

FireSim, also part of the WFA-E solution, is a simulation that can be run to forecast the potential fire behavior and spread over a 1- to 126-hour period to assess the potential impact on populations, buildings, utility assets, and other resources in the field. FireSim's model assumes no suppression efforts to slow the fire's spread and considers the following elements:

- **Initial Attack Assessment.** Assessment of how difficult initial attack could be for first responders and the probability of stopping the fire within the first operating period.
- **Population at Risk.** Projected number of people in the path of the fire and the estimated timing of when the fire is likely to arrive at populations.
- **Assets at Risk.** Physical assets such as utility equipment, residential and commercial structures, barns, outbuildings, etc. and the timing of when the fire is likely to arrive at assets.

- **Places at Risk.** Locations identified on the maps that may not be physical assets but have other significance. These could include parks, reservoirs, cultural sites, campgrounds, etc. These locations are default locations from Google Earth Studio.
- **Weather and fuels conditions.** Wind speed, direction, fuel moisture content.

Figure 9-11 below is an example of an output from FireSim near Dallas, Oregon.

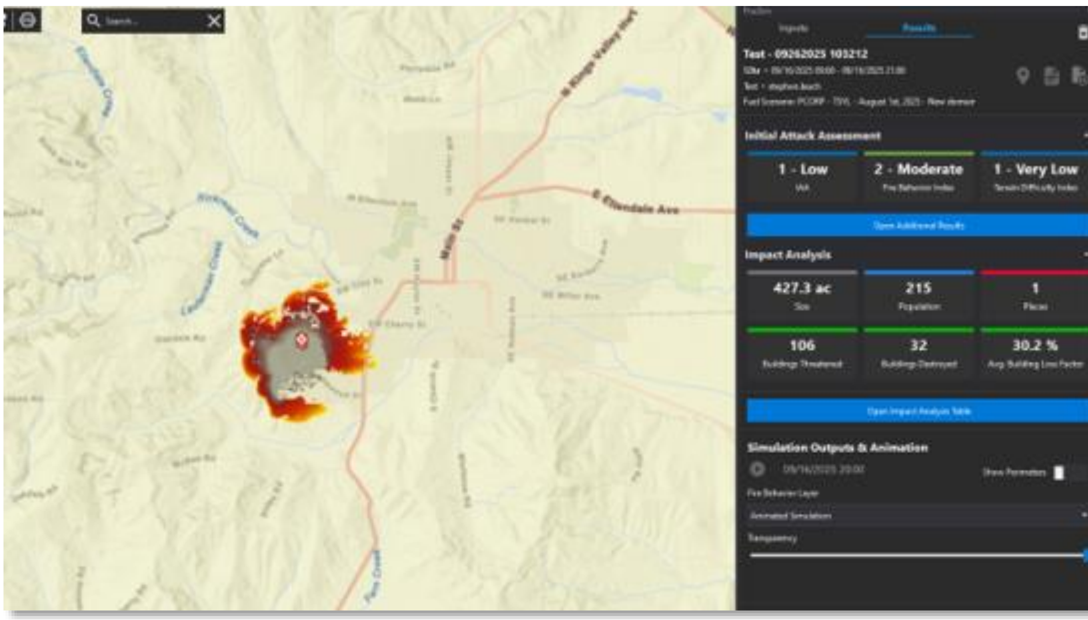


Figure 9-11: Example of a 12-hour FireSim output, near Dallas, Oregon

FireRisk can provide a 126-hour forecast at a macro level (service territory and operating area) or a micro level (lines, circuits) to provide the following:

- The potential for a fire, given fuel, weather, and other conditions.
- A simulation of how a fire would behave if there was an ignition. Characteristics include forecasted rate of spread, fire size, flame length, population threatened, and impact to assets (e.g., identification of buildings that would be threatened if a fire were to start).

These outputs are assigned a raw score and are compared with historical data to produce percentile values for risk. The software can be applied at the service territory level, the district level, and the asset level. Figure 9-12 and Figure 9-13 below are examples of district-level and asset-level FireRisk outputs for most of Oregon, dated September 5, 2025.

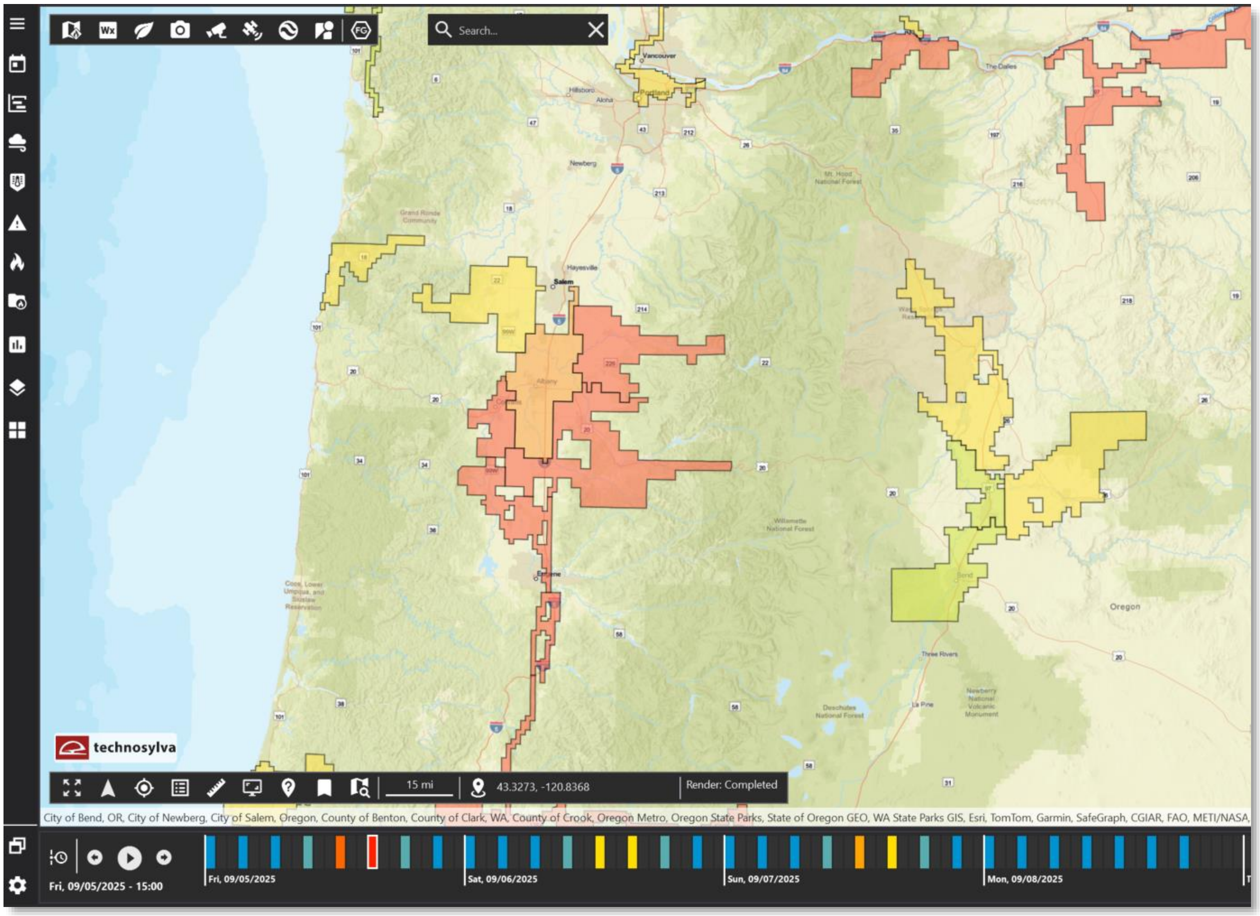


Figure 9-12: Example of a FireRisk District-Level Output in Oregon, Dated September 5, 2025

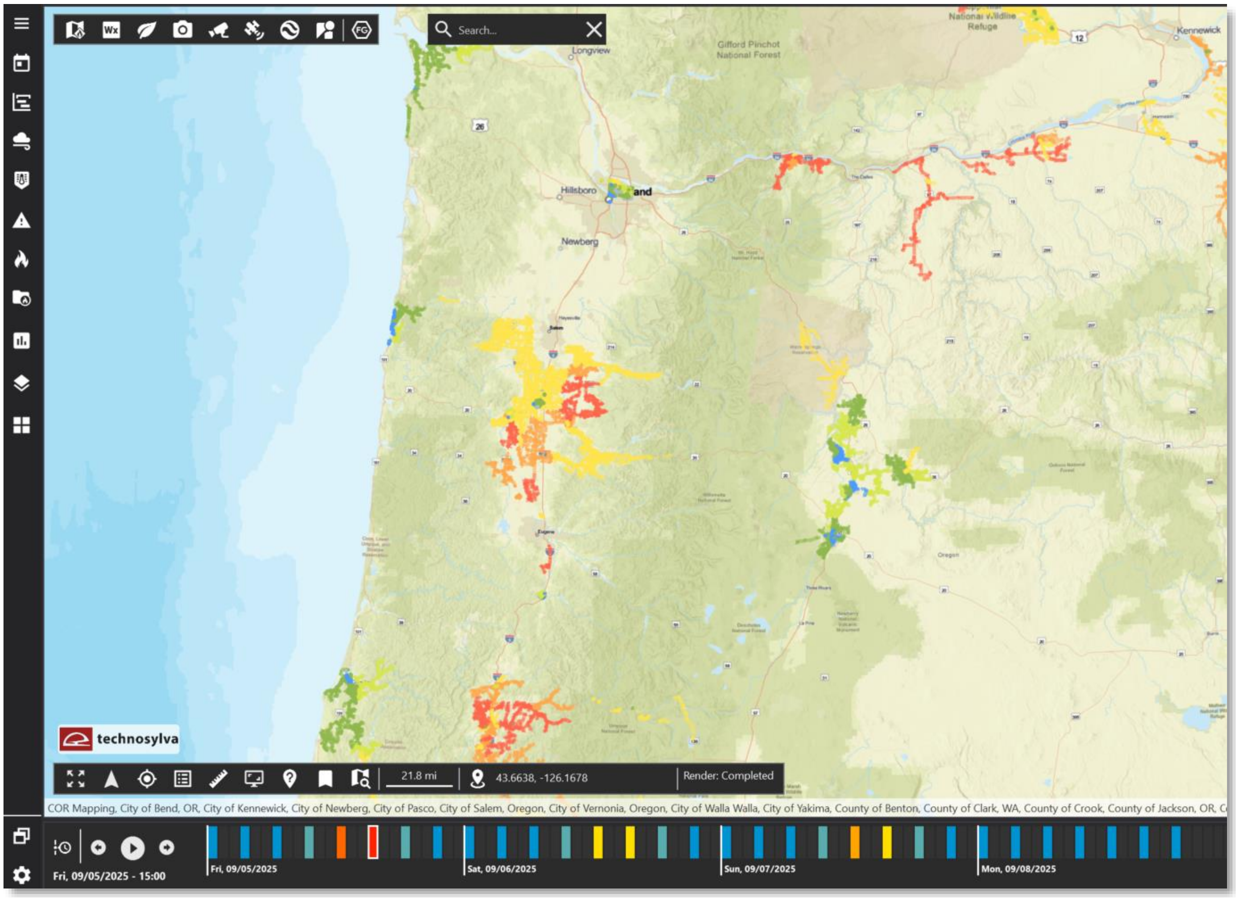


Figure 9-13: Example of a FireRisk Asset-Level Output in Oregon, Dated September 5, 2025

Technosylva sources most of the data inputs for these models. See **Error! Reference source not found.** f or the list of inputs.

Table 9-5: FireRisk and FireSim Inputs

Feature Group	Description	Spatial Granularity (meters)	Temporal Granularity	Data Vintage	Source
Landscape	Terrain	10	Yearly	N/A	United States Geological Survey (USGS)
Landscape	Surface Fuels	30/10	Pre Fire Season, Monthly Update In Fire Season, End Of Fire Season	2020	Technosylva
Landscape	WUI and Non-Forest Fuels Land Use	30/10	Twice A Year	2020	Technosylva

Feature Group	Description	Spatial Granularity (meters)	Temporal Granularity	Data Vintage	Source
Landscape	Canopy Fuels (Cbd,Ch,Cc,Cbh)	30/10	Pre Fire Season, Monthly Update In Fire Season, End Of Fire Season	2020	Technosylva
Landscape	Roads Network	30	Yearly	N/A	USGS
Landscape	Hydrography	30	Yearly	N/A	USGS
Landscape	Croplands	30	Yearly	1997	United States Department of Agriculture
Weather and Atmosphere	Wind Speed	2000	Hourly / 126-Hour Forecast	N/A	Technosylva
Weather and Atmosphere	Wind Direction	2000	Hourly / 126-Hour Forecast	N/A	Technosylva
Weather and Atmosphere	Wind Gust	2000	Hourly / 126-Hour Forecast	N/A	Technosylva
Weather and Atmosphere	Air Temperature	2000	Hourly / 126-Hour Forecast	N/A	Technosylva
Weather and Atmosphere	Surface Pressure	2000	Hourly / 126-Hour Forecast	N/A	Technosylva
Weather and Atmosphere	Relative Humidity	2000	Hourly / 126-Hour Forecast	N/A	Technosylva
Weather and Atmosphere	Precipitation	2000	Hourly / 126-Hour Forecast	N/A	Technosylva
Weather and Atmosphere	Radiation	2000	Hourly / 126-Hour Forecast	N/A	Technosylva
Weather and Atmosphere	Water Vapor Mixing Ratio 2m	2000	Hourly / 126-Hour Forecast	N/A	Technosylva
Weather and Atmosphere	Snow Accumulated – Observed	1000	Daily	N/A	National Oceanic and Atmospheric Administration (NOAA)
Weather and Atmosphere	Precipitation Accumulated – Observed	4000	Daily	N/A	NOAA
Weather and Atmosphere	Burn Scars	10	5 Days	2000	NASA/European Space Agency
Weather and Atmosphere	Weather Observations Data	Points	10 Min	N/A	Synoptic
Fuels	Herbaceous Live Fuel Moisture	250	Daily / 5-Day Forecast	2000	Technosylva
Fuels	Woody Live Fuel Moisture	250	Daily / 5-Day Forecast	2000	Technosylva
Fuels	1 Hr. Dead Fuel Moisture	2000	Hourly / 126-Hour Forecast	N/A	Technosylva
Fuels	10 Hr. Dead Fuel Moisture	2000	Hourly / 126-Hour Forecast	N/A	Technosylva
Fuels	100 Hr. Dead Fuel Moisture	2000	Hourly / 126-Hour Forecast	N/A	Technosylva

Feature Group	Description	Spatial Granularity (meters)	Temporal Granularity	Data Vintage	Source
Fuels	1000 Hr. Dead Fuel Moisture	2000	Hourly / 126-Hour Forecast	N/A	Technosylva

The WFA-E suite also integrates probability of failure (POF) metrics to enhance its risk assessment capabilities. By combining wildfire behavior modeling with POF data, PacifiCorp gains a more comprehensive understanding of the likelihood of asset failure contributing to wildfire risk. This integration allows the utility to evaluate not only the environmental conditions that could lead to wildfires but also the vulnerability of specific assets within the service territory. POF is particularly valuable in assessing the operational risks associated with aging or high-risk infrastructure, helping to inform prioritization of mitigation efforts and resource allocation.

9.2.6 Weather Forecasting

Tracking ID: OR-SA-11, OR-SA-16

Weather forecasts play an important role in mitigating the risk of electric utility-caused wildfires. By more accurately predicting weather conditions and their impact on the grid, electric utilities may proactively take steps to reduce the risk of fire ignition and spread, ensuring public safety. Gathering, interpreting, and translating data to inform utility-specific risk assessment and decision-making is central to PacifiCorp's situational awareness capability. To support this effort, PacifiCorp has established a Meteorology Department. This team consists of full-time forecasting meteorologists, operations managers, program managers, and directors. The team's experience includes decades of weather and fire weather forecasting for various government and private-sector agencies.

The objectives of PacifiCorp's Meteorology Department are to

1. manage day-to-day threats and risk of fire ignition and spread,
2. provide information to operations to inform and recommend changes to operational protocols during periods of elevated risk as depicted in Figure 9-14 below, and

3. identify and close any forecasting data gaps.

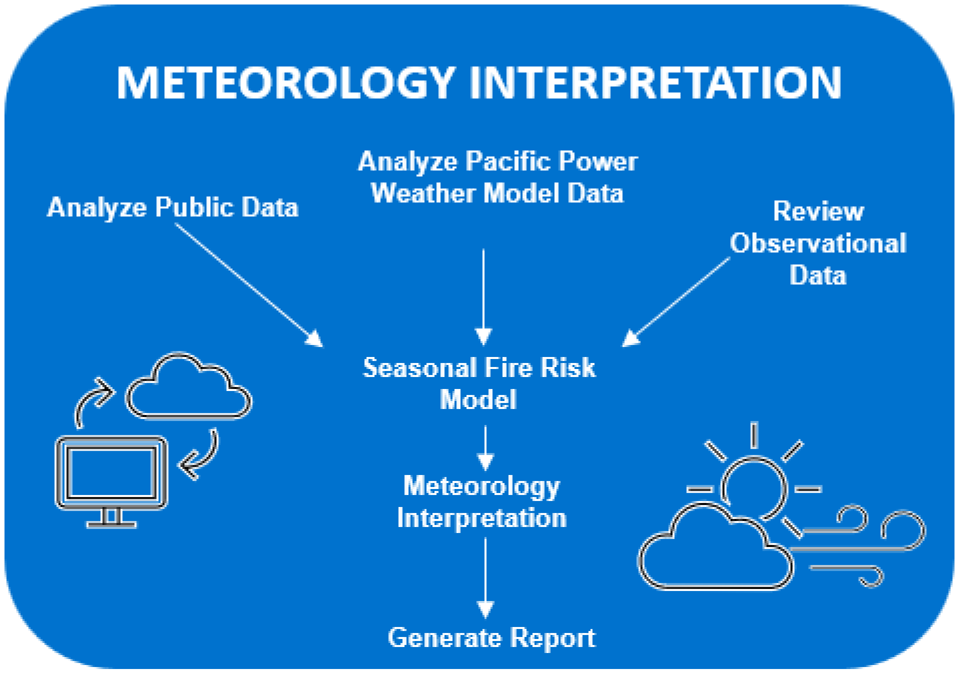


Figure 9-14: Meteorology Daily Process

9.2.6.1 Existing Modeling Approach

PacifiCorp's existing weather and seasonal wildfire modeling approach uses a data-driven, impacts-based forecasting system consisting of an operational Weather Research and Forecasting (WRF) model, a complementary WRF reanalysis, and WFA-E models. More specifically,

- PacifiCorp's WRF model provides twice-daily operational weather forecasts across its entire service territory. PacifiCorp's WRF model output includes National Fire Danger Rating System (NFDRS) variables relevant to forecasting fuels conditions and wildfire danger.
- PacifiCorp operates a WRF reanalysis to establish climatology for weather, fuels, and fire danger conditions across the service territory. This analysis initially included 30 years of reanalysis data and is updated annually to help ensure that more granular, current climate data is used in determining percentile-based metrics.

- The Company also uses its WRF reanalysis and other relevant training data such as past power outage records, wildfire statistics, and historical weather observations. These metrics use the output from the operational WRF to predict weather-related outages, wildfire risk, and other relevant impacts.
- PacifiCorp uses WFA-E's suite of products including FireRisk and FPI dashboards to produce a daily forecast of wildfire potential, risks, and consequences for distribution and transmission assets across the Oregon service area, as discussed in Section 9.2.5.2.

Figure 9-15 below depicts PacifiCorp's operational weather modeling approach.

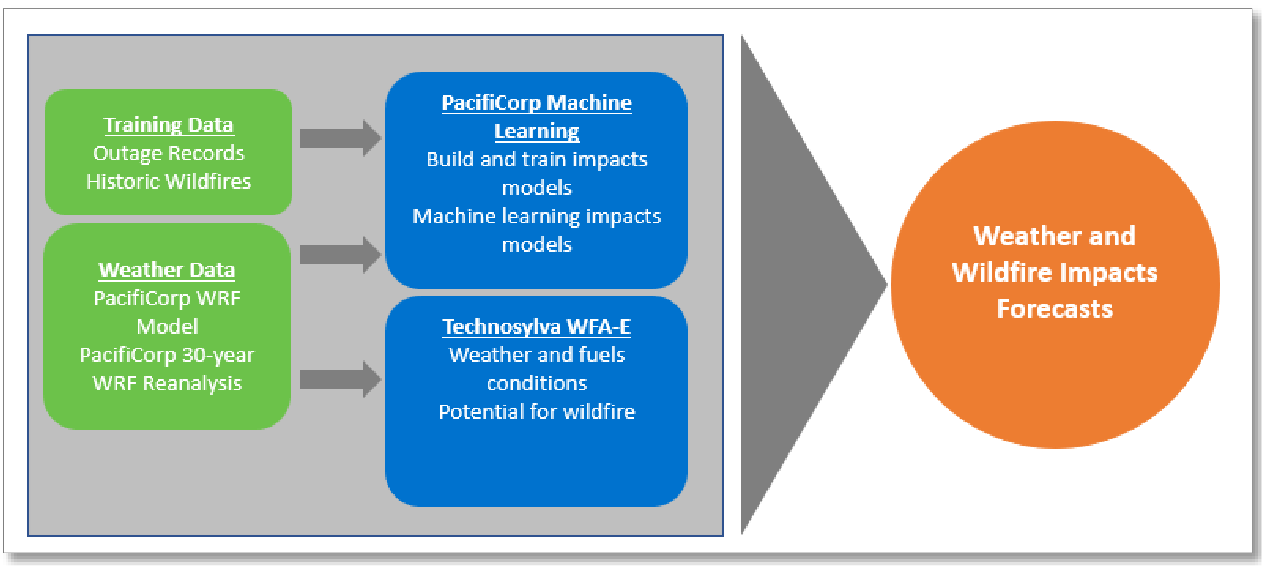


Figure 9-15: Existing Operational Weather and Seasonal Wildfire Modeling Approach

Operational WRF Model: PacifiCorp's Meteorology Department runs a twice-daily WRF model, which is initialized from the Global Forecast System (GFS) with an hourly, 2 kilometer (km) resolution. The WRF produces a comprehensive 126-hour forecast of atmospheric, fire weather, and NFDRS variables. The WRF model's high resolution gives a much more complete picture of finer-scale atmospheric features than is available with most public five-day-ahead timescale models. This enables the model to give a variety of weather and fire metrics down to the zone of protection level across the PacifiCorp service territory. The WRF output is made available internally through the Company's

GREATER application, Palantir Foundry, Technosylva's WFA-E, WeatherBell, and a web-based visualization portal. WRF forecast data relevant to wind speed, temperature, relative humidity, and precipitation is publicly available through the Company's situational awareness website. The WRF model configuration is the process of defining all the settings, inputs, and assumptions that determine how a numerical weather prediction model will run. An example of this information is depicted below in Figure 9-16.

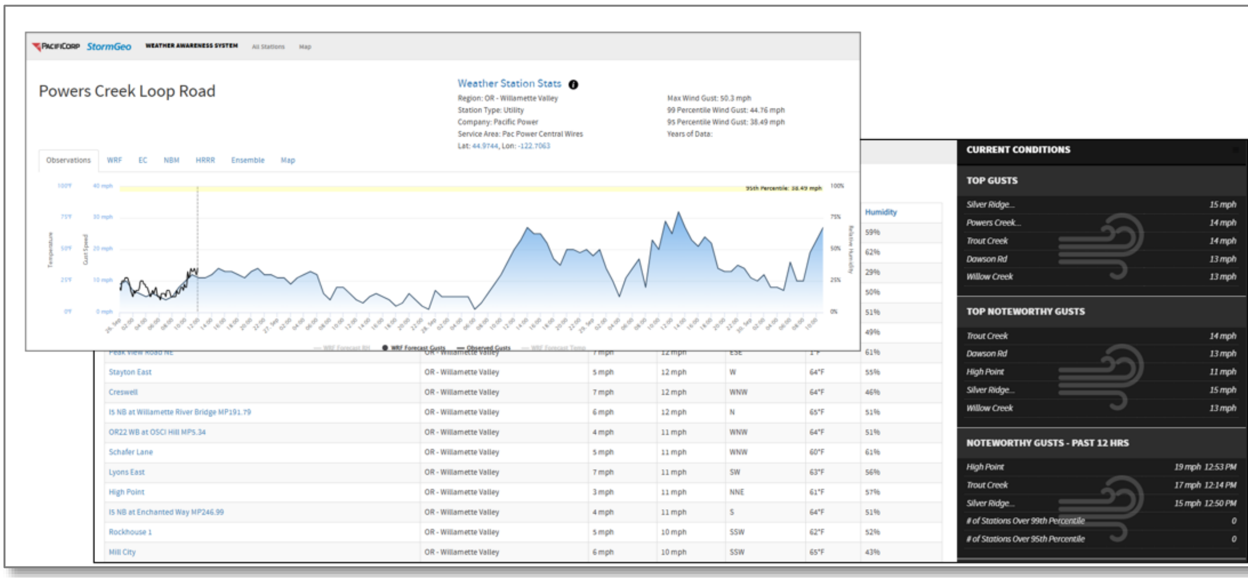


Figure 9-16: Example of Data Available on PacifiCorp's Weather Website

PacifiCorp WRF model configuration:

- Inner domain = 1.3 million square miles
- Spatial horizontal resolution = 2 km
- Spatial vertical resolution = 52 vertical levels
- Temporal resolution = 1 hour
- Forecast horizon = 126-hour
- Atmospheric inputs for WRF initialization = GFS
- New Thompson microphysics scheme
- Mellor-Yamada-Nakanishi-Niino (MYNN) surface layer scheme

- MYNN3 planetary boundary layer (PBL) scheme
- New Goddard shortwave radiation scheme
- New Goddard longwave radiation scheme
- NOAA-MP land surface scheme
- Land use data = Moderate Resolution Imaging Spectroradiometer (MODIS) 30s
- Terrain height = Global Multi-resolution Terrain Elevation Data (GMTED) 2010 30s
- Sea surface temperature = National Aeronautics and Space Administration (NASA) Short-term Prediction Research and Transition (SPoRT) and Real-Time Global (RTG) blended temperatures at 1km horizontal resolution
- Albedo, green vegetation fraction and Leaf Area Index = MODIS climatological inputs
- WRF soil moisture is cycled in between forecasts
- WRF snow cover is cycled in between forecasts

PacifiCorp's WRF domain is depicted in the image below in Figure 9-17. The dark gray shaded region represents the 6 km outer domain. The orange box represents the outer edge of the inner 2 km domain.

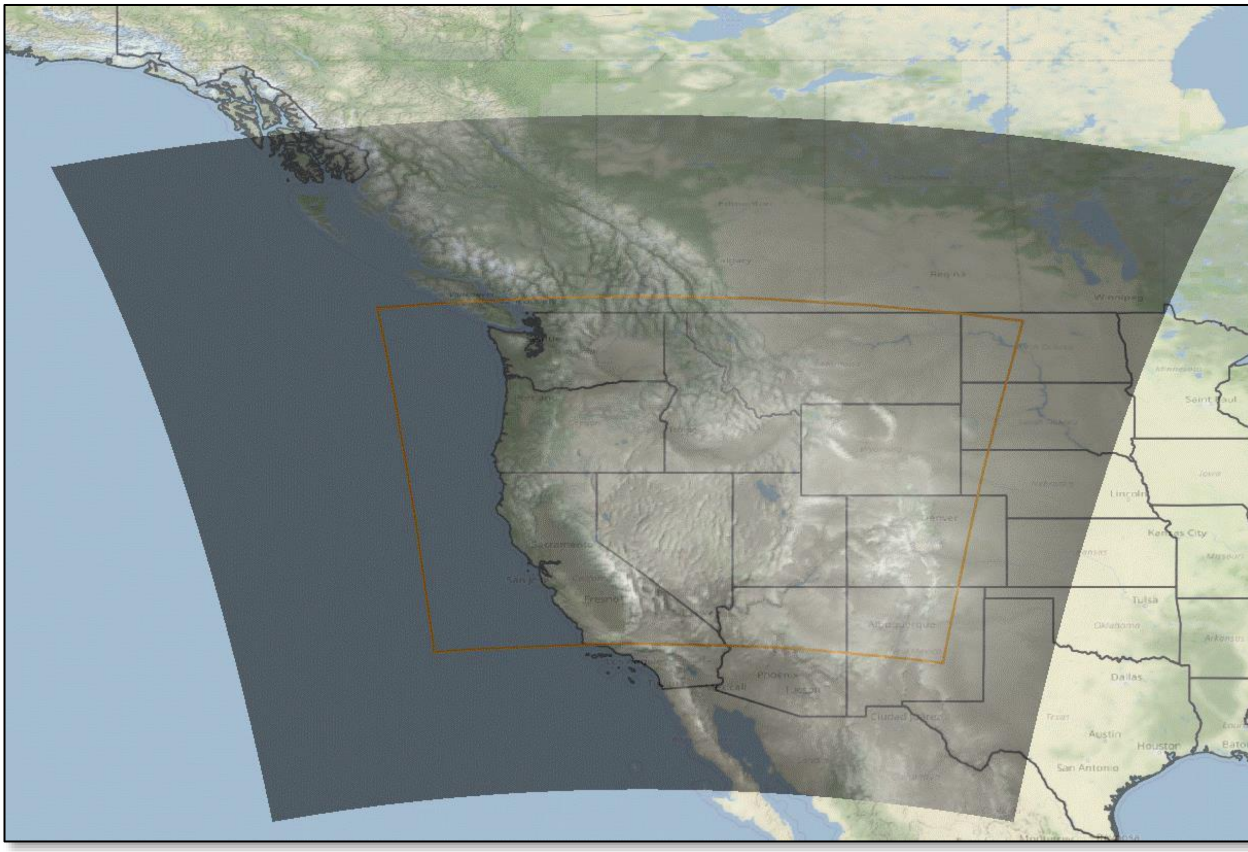


Figure 9-17: PacifiCorp's WRF Domain

WRF Reanalysis: PacifiCorp operates a 2 km-resolution, hourly WRF reanalysis, which serves as both a detailed climatological record of weather and fire weather across its service territory and as a training dataset for statistical and machine learning models. This dataset is updated annually, with an additional year added annually to ensure the reanalysis remains current. The WRF reanalysis dataset is used to train predictive models, leveraging the Company's operational WRF output to forecast weather-related outages, wildfire risk, and other relevant impacts.

PacifiCorp has already used the completed reanalysis dataset, along with archived power outage records and historical wildfire data, to improve weather-related outage thresholds and wildfire risk assessments. The reanalysis is initialized with Climate Forecast System Reanalysis (CFSR), rather than GFS, while maintaining identical configurations to the operational WRF. It provides the same weather, fire weather, and NFDRS outputs as the operational WRF, supporting PacifiCorp's efforts to enhance its predictive capabilities and operational efficiency.

9.2.6.2 Known Limitations of Existing Approach

PacifiCorp's current WRF modeling approach has limitations related to computational demands, data management, and data availability. Specifically, PacifiCorp's current modeling approach has the following limitations:

- **Computational Requirements:** PacifiCorp's WRF domain covers the Company's entire six-state service territory. Significant computational resources are needed to efficiently run a WRF of this size. Even with PacifiCorp's five high-performance computing clusters (HPCC) and recent WRF optimizations, the operational WRF forecasts are not available until eight hours after initialization. Further, completing the companion WRF reanalysis required one of PacifiCorp's HPCCs to run continuously for nearly 16 months.
- **Data Management**: PacifiCorp's WRF generates nearly one terabyte of weather forecast data every day. Further, the WRF reanalysis contains approximately five petabytes of data. Managing the large amounts of data produced by these two models is extremely challenging for both the Company and its vendors.
- **Data Availability:** GFS model output is a critical input into the Company's WRF. Unexpected problems related to the servers at the National Center for Environmental Prediction (NCEP) can result in delayed or even missing WRF runs. This would be serious if such a problem occurred immediately prior to or during a significant fire weather event. Further, the NFDRS WRF outputs (specifically 1, 10, 100 and 1000-hour dead fuel moisture) require a continuous record to run correctly. Therefore, missing WRF runs must be completed before future runs can occur if they are to contain accurate NFDRS outputs.

Together, these limitations may impact the timeliness, reliability, and effectiveness of the Company's forecasting system, underscoring the need for ongoing and continued improvements.

9.2.6.3 Evaluating Activities

Evaluation of PacifiCorp's model performance is primarily qualitative in the program's development. PacifiCorp meteorologists use WRF to perform daily forecasts, and the WRF model is continually evaluated against real-time observations and other publicly available model data. Any observed trends or biases are communicated to the vendor for investigation and validation.

Currently, no other publicly available weather models can provide a five-day (126-hour) 2 km-resolution weather and NFDRS forecast across the Company's entire six-state service territory. High-resolution NFDRS outputs are especially critical as they provide insight into fuel moisture and fire weather conditions for all PacifiCorp's distribution and transmission assets at the zone of protection (ZOP) level. PacifiCorp's meteorologists have observed that WRF tends to perform better than other, coarser-resolution models in the utility's complex terrain. Further, WRF has been instrumental in providing advanced warnings of significant and extreme fire weather threats since its implementation. Additional internal and external validation of the deterministic WRF performance may need to be investigated at some point over the next three years to ensure optimal performance. Details surrounding the validations will be assessed on an ongoing basis as PacifiCorp better understands how potential improvements can be of benefit.

By combining operational WRF data with completed WRF reanalysis data, PacifiCorp can compare current and past forecasts. This enables meteorologists to assess the forecasted fire weather threats in the context of past threats. WRF, in combination with WFA-E, has already demonstrated success. In the September 2022 PSPS event in Oregon, PacifiCorp used its WRF and WFA-E data to identify the circuits of risk several days in advance of the threat. The data were based on circuit-level wind-related outage probabilities, ZOP-level fuels and fire weather forecasts, and wildfire spread and consequence modeling. PacifiCorp used the data to identify the PSPS areas where extreme winds and extreme fire potential risk existed.

PacifiCorp expects the evaluation of model performance and efficacy to become increasingly sophisticated and automated over time. The current modeling approach has dramatically increased forecasting ability since the inception of the in-house Meteorology Department.

9.2.7 Situational Awareness and Forecasting – Performance Monitoring

For a discussion of how PacifiCorp evaluates the performance of its situational awareness and forecasting systems and tools, please refer to Sections 9.2.1.4, 9.2.2.3, 9.2.3.3, 9.2.4.3, and 9.2.6.3.

9.2.8 Situational Awareness and Forecasting – Other

PSPS Circuit Forecast Editor

The PSPS Circuit Forecast Editor streamlines the Meteorology team's ability to produce circuit-by-circuit forecasts in advance of a potential PSPS event. The PSPS Circuit Forecast Editor supports rapid identification of isolation facility points and weather stations that need to be monitored by Meteorology. With the PSPS Circuit Forecast Editor tool, forecasters can identify the circuits or zones of protection (ZOPs) at the highest risk of meeting the PSPS criteria up to 126 hours (five days) in advance of a potential PSPS event. Specifically, when a forecast indicates the conditions may be met for a PSPS event, the Meteorology team uses the PSPS Circuit Forecast Editor to identify the circuits where wind gusts may meet or exceed the PSPS threshold for that location. This may give PacifiCorp more lead time to communicate with customers and public safety partners about an impending PSPS event.

Figure 9-18 is a screenshot from the PSPS Circuit Forecast Editor. The meteorologist can select circuits by drawing a polygon over the map to select all ZOPs of circuits that are within or intersect the polygon's boundaries. Doing so provides a potential PSPS event on a subcircuit level.

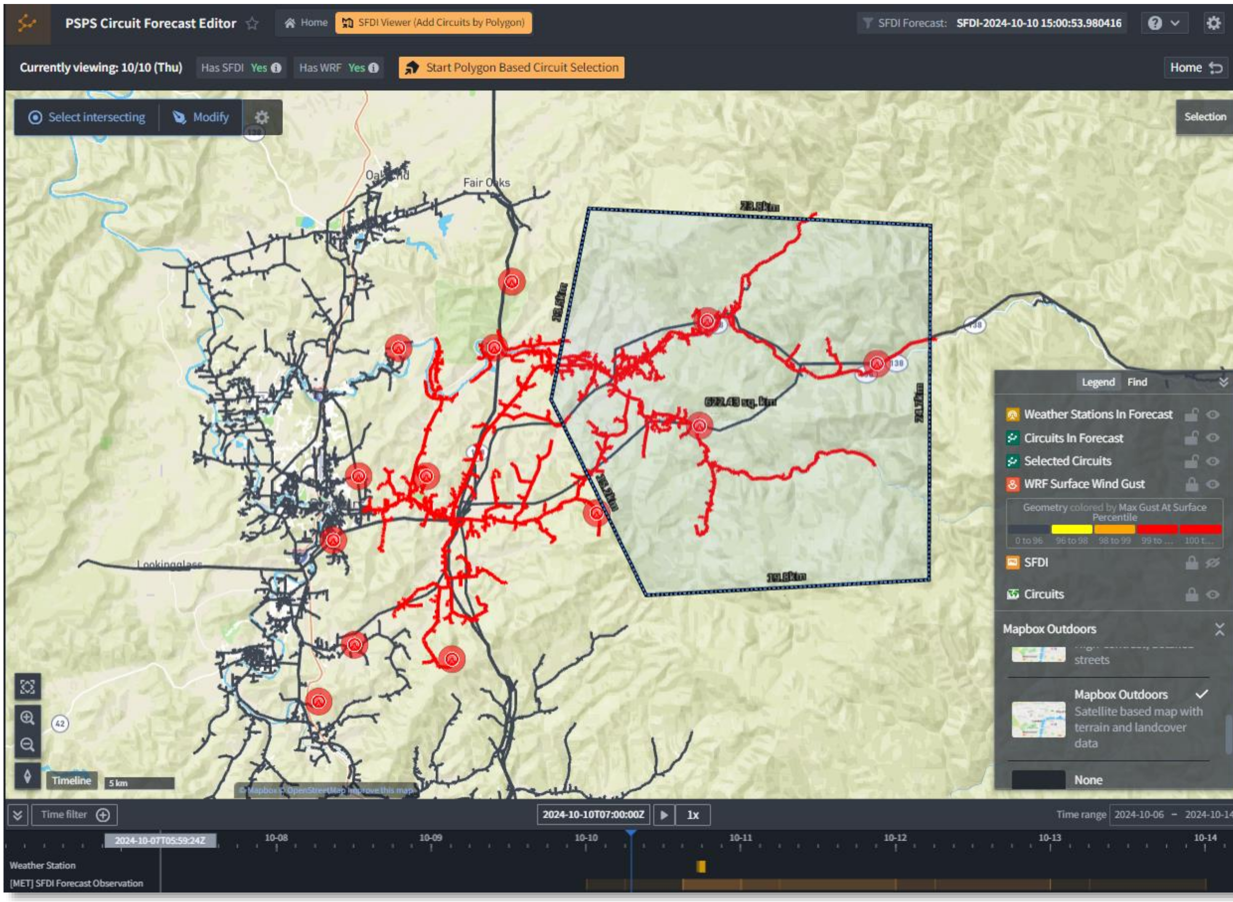


Figure 9-18: Example of the PSPS Circuit Forecast Editor

9.3 Results

Normalized Differential Vegetation Index (NDVI)

NDVI machine learning model improves PacifiCorp's ability to understand changing moisture and health of vegetation across the service territory by providing additional data for forecasting in determining fire potential risk. This in turn is crucial to understanding when fuels in grassland/range might be susceptible to ignition and guide the group in determining when there is a need to raise wildfire risk potential levels.

Weather Research and Forecasting (WRF)

As demonstrated in Section 9.2.6, PacifiCorp uses its WRF reanalysis and other relevant sources of data such as outage records, wildfire statistics, and weather forecasts and monitoring to predict weather-related outages, wildfire risk, and other impacts. The initial analysis was a 30-year reanalysis of data but is now updated annually. This helps to ensure that the most recent and granular data is used in determining percentile-based metrics, giving the Company better insights for decision-making across its service territory.

Wildfire Fuel and Terrain Polygons

Polygons are used to produce more precise short-term risk-based forecasts which would ultimately affect operational postures during fire season. This has allowed PacifiCorp forecasters to be more precise in forecasting where vegetation types may differ in high-elevation areas from low-elevation areas. As this process was implemented in 2025, PacifiCorp will continue to review this tool as the Company's use of it matures.

PSPS Circuit Forecast Editor

As discussed in Section 9.2.8, by utilizing the PSPS Circuit Forecast Editor tool the Company is able to identify ZOPs that may be at risk of meeting PSPS criteria up to five days in advance of a PSPS event in a more precise way and optimizes the way this risk is communicated across the Company.

9.4 Initiatives and Targets

9.4.1 Initiative Summary Table

In Table OPUC 9-1 PacifiCorp presents its 2026-2028 situational awareness and forecasting initiatives and targets, which are described further below.

Table OPUC 9-1: Situational Awareness and Forecasting Initiative Cost Summary in Thousands

Initiative Activity	Tracking ID	Target Unit	2026 Target	2026 Forecast ($1,000)	2027 Target	2027 Forecast ($1,000)	2028 Target	2028 Forecast ($1,000)	Three-Year Total ($1,000)	Section
Data Analytics	OR-ES-03	Qualitative	Annual Review of data and implementation of updates	[redacted]	Annual Review of data and implementation of updates	[redacted]	Annual Review of data and implementation of updates	[redacted]	[redacted]	5.4.3, 9.4.1, 9.5.6,
Weather Station Maintenance and Calibration, Target Unit: Weather Station Fleet	OR-MA-01	Weather stations calibrated	209	[redacted]	217	[redacted]	222	[redacted]	[redacted]	9.2.1
Expansion of Weather Station Network	OR-SA-01	Weather stations	10	[redacted]	10	[redacted]	0	[redacted]	[redacted]	9.2.1
Ignition Detection Systems: Accessible Wildfire Cameras	OR-SA-04	Total cameras accessible for situational awareness	38	[redacted]	38	[redacted]	38	[redacted]	[redacted]	9.2.4, 9.5.4
Fire Potential Index (FPI) Improvements	OR-SA-06	Qualitative	Annual evaluation of FPI performance and updates as needed	[redacted]	Annual evaluation of FPI performance and updates as needed	[redacted]	Annual evaluation of FPI performance and updates as needed	[redacted]	[redacted]	9.2.2, 9.5.2

Initiative Activity	Tracking ID	Target Unit	2026 Target	2026 Forecast ($1,000)	2027 Target	2027 Forecast ($1,000)	2028 Target	2028 Forecast ($1,000)	Three-Year Total ($1,000)	Section
Situational Awareness Tools and Models	OR-SA-11	Qualitative	Extension of WRF Reanalysis Annual updates to fuels models Annual review of wildfire criteria Improvements to Self-Organizing Maps (SOMs) Wind Topography (TOPO) project to bring higher resolution data for winds across the service territory	[redacted]	Annual updates to fuels models Annual review of wildfire risk criteria	[redacted]	Annual updates to fuels models Annual review of wildfire criteria Validation of machine learning NDVI data	[redacted]	[redacted]	9.2.4, 9.2.6, 9.5.6
Implement WRF Ensemble Forecasting System (Weather Forecasting)	OR-SA-12	Qualitative	-Implemented both with software and hardware completed.	[redacted]	N/A	[redacted]	N/A	[redacted]	[redacted]	9.5.5
Machine Learning techniques of NDVI and SOMs	OR-SA-14	Qualitative	Completion of NDVI product Scoping completed for increased functionality of SOMs	[redacted]	Enhanced SOMs	[redacted]	NDVI validation with real-time data	[redacted]	[redacted]	9.5.6
Weather Station Data Collection Plans	OR-SA-15	N/A	N/A	[redacted]	N/A	[redacted]	N/A	[redacted]	[redacted]	9.2.1
Meteorology Team	OR-SA-16	N/A	N/A	[redacted]	N/A	[redacted]	N/A	[redacted]	[redacted]	9.2.6

9.4.2 Ignition Detection Systems: Accessible Wildfire Cameras

Tracking ID: OR-SA-04

A state funding shortfall has resulted in the need to disable approximately 30 of Oregon Hazards Lab's cameras in the Oregon viewshed that provide detection of ignitions and environmental monitoring. Accordingly, the Commission Chair requested that OPUC Staff, Portland General Electric, and PacifiCorp review the cameras to determine which cameras provide valuable viewshed coverage and which cameras should likely remain operational. Together, the companies and Staff were asked to determine from which cameras each respective company benefited and of which cameras they should take over operations and costs.

PacifiCorp coordinated with parties to analyze and recommend cameras that provide benefit to the customers and communities the Company serves. Specifically, the Company's analysis identified nine cameras that provide benefits to the Company's service territory. The results of the analysis and the recommendation were reviewed with the OPUC Chair and Staff, who were supportive of the recommendation. The cost of the maintenance of these cameras is included in OR-SA-04 costs.

9.5 Continuous Improvement

9.5.1 Environmental Monitoring Systems

The weather station network has been built following a methodology to assess risk, climatology data, and the best location for placement. The intent of weather station placement is to provide reliable and accurate data to support better forecasting and to inform real-time situational awareness and decision-making during adverse fire weather conditions. Figure 9-19 below shows considerations in placing weather stations.

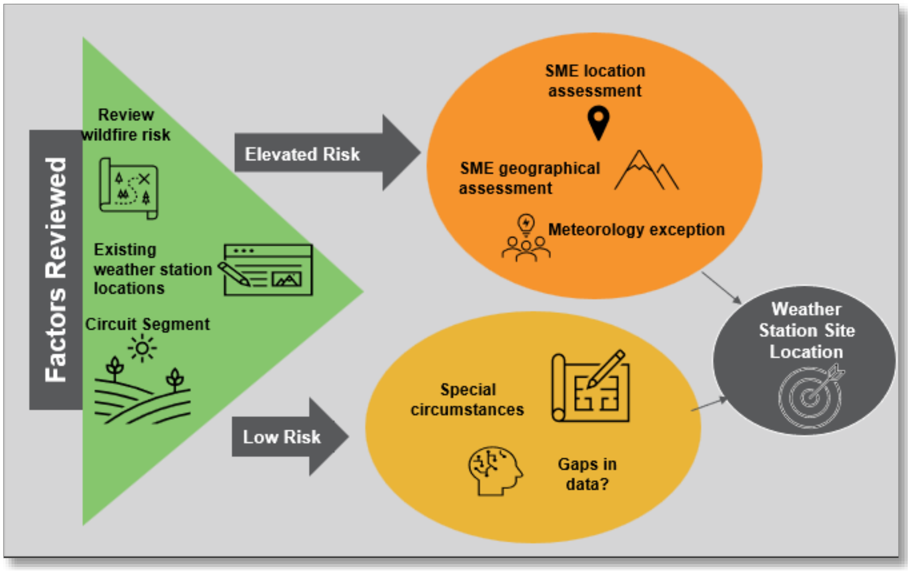


Figure 9-19: Considerations in Weather Station Placement

Rather than rely solely on publicly available data during critical fire weather events, PacifiCorp installs weather stations directly on Company equipment. These Company-owned weather stations fill critical gaps in existing observation networks and ensure the data reported is representative of the weather impacting Company facilities. PacifiCorp has found that publicly available weather stations may report conditions that are not representative of the Company's facilities due to their distance from the facilities or other factors. PacifiCorp weather stations report every 10 minutes, and up to every 30 seconds during emergency operations, whereas public weather stations may only report once per hour. Furthermore, by installing its own weather stations, PacifiCorp has complete control over network calibration and maintenance to ensure that the weather data the Company uses to support operational decision-making is of the highest quality.

Figure 9-20 below, from the September 10, 2022, PSPS event in Oregon, highlights how PacifiCorp's weather stations will cover critical gaps and capture localized strong wind conditions that would otherwise go undetected using the existing non-utility weather station networks. For reference, the left image in Figure 9-20 shows PacifiCorp wind gust speeds in mph during the September 2022 PSPS event along with external weather stations in black while the image on the right shows just internal weather stations, with wind gust speed in mph. As demonstrated, weather stations in areas adjacent to each other may yield differing wind speeds depending on variables such as terrain.

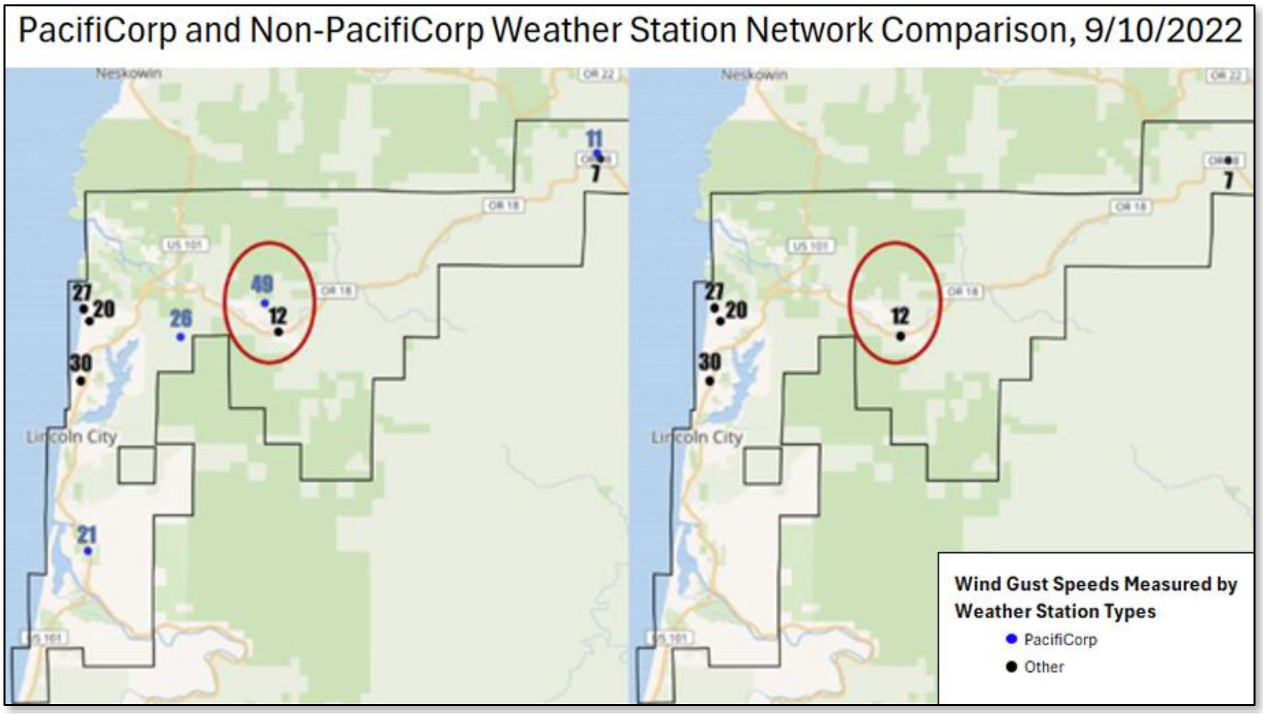


Figure 9-20: Weather Station Report from September 10, 2022, PSPS Event in Oregon

PacifiCorp has approved a standardized approach to maintaining a specified weather station density within its service territory. The methodology established maintains a varying radial distance between weather stations and ZOPs based on terrain type and risk classification, which may also include urban development density and vegetation size, in addition to terrain features. Because PacifiCorp's service territory includes both complex mountainous areas and large areas of flat or rolling terrain, some areas may require a higher weather station density than others. For example, areas east of the Cascades may not require the same weather station density as areas with complex terrain. In areas with complex terrain such as mountains, steep canyons, and ridgelines, weather conditions may vary considerably over a shorter distance, requiring more data to account for the varying terrain features.

9.5.2 Fire Potential Index

Tracking ID: OR-SA-06

PacifiCorp continues to work closely with Technosylva to improve FPI outputs to supplement other wildfire risk products. The FPI model currently quantifies the potential for large wildfires looking forward five days based on weather, fuels, and terrain inputs. To accomplish this, Technosylva performed a detailed analysis of past weather from PacifiCorp's WRF reanalysis, satellite-derived hotspot (wildfire) data from the Visible Infrared Imaging Radiometer Suite (VIIRS), and other environmental data.

Recent improvements include the FPI percentile metric, which puts the FPI raw values into a historical context, allowing for a better understanding of how FPI values affect the service territory at a district level. Future improvements of the FPI include ways to utilize the value in ways that are meaningful to the Company. In cooperation with PacifiCorp's vendor, the FPI metric will continue to be continuously improved upon, both with internal and external validation efforts. This metric represents the local environmental variability, which is important when considering the vast microclimates across the PacifiCorp service territory in Oregon.

9.5.3 Grid Monitoring Systems

Tracking ID: OR-SA-07, OR-SA-08, OR-SA-09

Table 9-6: Planned Grid Monitoring SystemsTable 9-6 below summarizes the grid monitoring improvements planned for the 2026-2028 WMP cycle. In Oregon, PacifiCorp utilizes three systems to monitor the operational conditions of its equipment. These systems observe line current, voltage, and conductor temperature, among other measurements that are intended to locate faults and detect defects. These initiatives and their targets are indicated in Table OPUC 6-1.

Table 9-6: Planned Grid Monitoring Systems

System	Description	Impact
Line Sensors: CFCI Distribution (≤35kV)	Installation of line sensors capable of detecting and reporting overcurrent events and faults in HFRZ.	Early detection and localization of overcurrent events enable proactive corrective actions to be taken; if a fault occurs localization improves response time.
Circuit Breaker/Recloser Monitoring/Control: SCAN	Installation of communications network infrastructure and operational technology, enabling retrieval of relay event files and control of operation state.	Control of operational state enables activation of fast-acting overcurrent protection and high-impedance fault detection algorithms. Event files enable root cause analysis, evaluation of protection system effectiveness, and identification of opportunities for improvement.
Distribution Protection Settings Review	Update protection devices where implementation of settings did not occur at the time of installation.	Reduction in sustained outage frequency when using elevated fire risk (EFR) versus Tagged. The initiative reviewed the settings previously issued for the devices that are in scope and after the settings are reviewed, ensured they are re-issued and installed to the current standard.

9.5.4 Ignition Detection Systems

High-Definition Cameras

Tracking ID: OR-SA-04

In 2026, PacifiCorp will bring into service an additional three wildfire detection cameras, bringing the total to eight that it owns and operates in Oregon. Additionally, starting in 2026, the Company will utilize visibility and alerts from 30 shared access cameras, nine of which are operated by the Oregon Hazards Lab at the University of Oregon, for the detection of ignitions and area monitoring. The deployment of this expanded camera network will enable PacifiCorp to leverage enhanced visibility across its service territory, resulting in a more comprehensive and effective wildfire-detection regime within the state.

9.5.5 Near-Term Risk Modeling

WRF Ensemble Forecasting

Tracking ID: OR-SA-12

The WRF Ensemble Forecasting initiative involves implementing an advanced approach to predicting weather by combining multiple forecasts generated using slightly different initial conditions. Instead of relying on a single forecast, the ensemble system will leverage the power of many simulations to provide a more comprehensive picture of potential future weather scenarios. This will likely give PacifiCorp the ability to focus on low-probability, high-impact events. This approach will be used to improve accuracy and help plan for uncertainty during weather events, most notably PSPS events.

9.5.6 Weather Forecasting

Tracking ID: OR-SA-11

The internal PacifiCorp WRF will be validated on a regular basis to ensure it is performing optimally. This will involve validating the WRF both internally and externally with vendors. The WRF will continue to be enhanced by adding additional forecasting variables that will increase the amount of data PacifiCorp can use for daily risk forecasting.

Climate Vulnerability Assessment

PacifiCorp is actively participating in the Electric Power Research Institute's Climate READi study and partnering with Argonne National Laboratory to assess climate change impacts within its service territory. This third-party vendor will generate climate impact information metrics based on a mid-century timeframe (2045-2054) and RCP8.5 emission. The outcomes will be based on 12 km × 12 km dynamically downscaled climate model projections. PacifiCorp will incorporate the results into future planning for long-term risk modeling.

Machine Learning Techniques of Normalized Differential Vegetation Index (NDVI) and Self Organizing Maps (SOMs)

Tracking ID: OR-SA-14

Machine learning techniques of Normalized Differential Vegetation Index (NDVI) will bring a new way to evaluate vegetation health across the service territory, particularly during the spring months as fuels transitions from a dormant to live state. The Self Organizing Maps (SOMs) project will continue to improve existing machine learning work within the Meteorology program to help assist in forecasting and recognizing patterns in weather phenomena across the service territory.

Data Integration (Foundry)

Tracking ID: OR-ES-03

Foundry is a tool that allows PacifiCorp to visualize the internal WRF models and overlay them with real-time weather station data and the location of PacifiCorp's transmission and distributions equipment. This data supports the daily risk assessment used to inform operational practices, as described in Section 10.2, and PSPS events, as described in Section 12.2.4. PacifiCorp will continue to refine its forecasting and situational awareness tools used during the 2026-2028 WMP cycle.

9.5.7 Situational Awareness and Forecasting – Other

Station-Level Machine Learning Weather Forecast Models

Station-level machine learning weather forecast models are a tool that was developed for bias correction to PacifiCorp's deterministic WRF model using PacifiCorp weather stations. This tool will help support PSPS preparedness and decision-making during fire season. This tool will help PacifiCorp validate its internal WRF model with real-time observations. The tool is still in the process of being developed and should be operational within the next year.

Five-Hour Median Wind Forecast Data

The Company is currently developing a five-hour median wind forecast data set to understand wind gust percentiles that potentially could be over-forecasted due to thunderstorm outflow boundaries. These over-forecasts affect parts of the PacifiCorp service territory. This data will produce a median wind gust of a five-hour period to better understand wind gusts associated with thunderstorms.

National Fire Danager Rating System Forecasted Variables

This tool is in development and will allow for various forecasted NFDRS variables at the weather station level. These weather station variables are tied to PacifiCorp assets and allow for a variety of key fire forecasts. The following metrics are available within this tool: ERC raw value, 1, 10, 100, and 1000-hour dead fuel moisture percentage, ignition component percentage, and burning index raw value. These metrics allow the Meteorology team to have a 126-hour forecast with weather stations across the service territory.

10. Grid Operations and Protocols

10.1 Overview

Adjustments to power system operations can help mitigate wildfire risk. System operations adjustments generally include modifying relay settings for protective devices on distribution lines. These adjustments include enhanced safety settings (ESS) or changes to line re-energization protocols described in this section. These adjustments are not universally applied to power system operations because there are certain disadvantages in their use. Indeed, these settings may increase the outage frequency and duration that customers experience. In other words, a balance is required to provide customers with reliable power while still mitigating wildfire risk. To help balance these concerns, PacifiCorp is deploying a suite of technologies, as discussed further below.

10.2 Mitigations

Tracking ID: OR-GO-01

Protective Equipment and Device Settings

Protective relay devices, such as circuit breakers and line reclosers, are currently deployed on distribution lines throughout PacifiCorp's service territory. When a line trips open due to fault activity, protective relay devices can be programmed to momentarily open, allow the fault to dissipate, and then reclose to test if the fault is temporary. The reclosing function allows service to be restored on a line that has tripped while maintaining the option to open again if the fault persists. If the fault is permanent, the protective relay device will operate and stay open, known as the "lock out" state, until the line has been deemed ready for re-energization. Figure 10-1 below generally depicts one potential configuration of a distribution circuit with multiple protective relay devices.

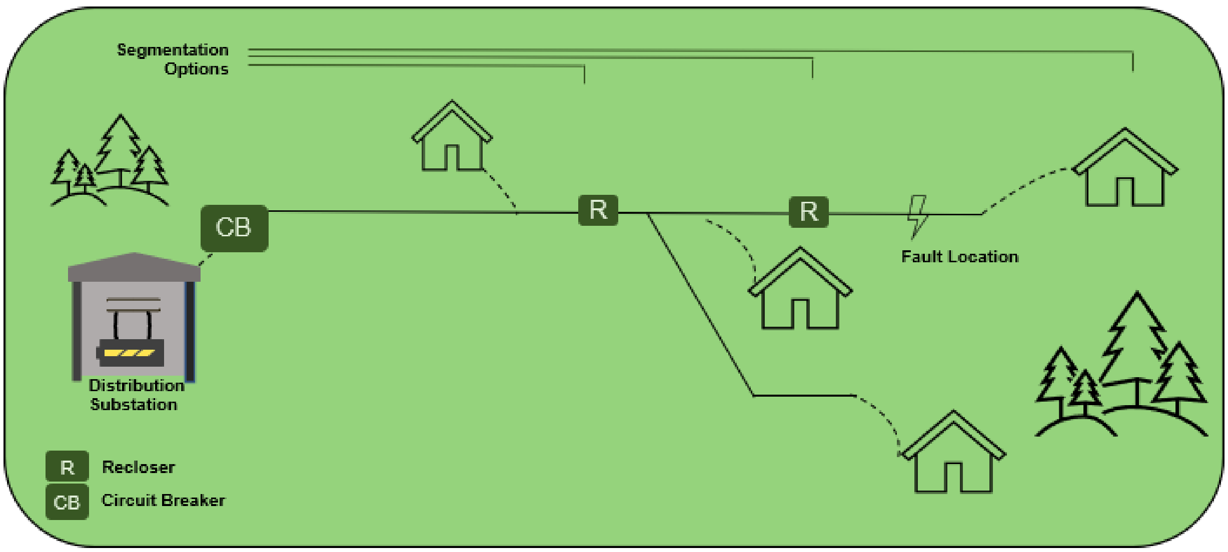


Figure 10-1: Example of Distribution Circuit with Multiple Protective Relay Devices

In general, reclosing is beneficial because it reduces the number of sustained outages and improves customer reliability. The reclosing function, however, poses some degree of ignition risk. If a fault persists, reclosing can, depending on the circumstances, result in arcing or an emission of sparks. Accordingly, a strategic balance between customer reliability and wildfire mitigation is required.

PacifiCorp has used reclosing disabling strategies on transmission lines for many years. In recent years, the Company has employed more frequent reclose disabling on transmission lines because of increased wildfire risk. PacifiCorp has used these strategies with minimal impact on customer reliability. With wildfire risk continuing to increase, PacifiCorp is implementing additional strategies on the distribution network, including the use of modified protection and control schemes to reduce wildfire risk, referred to as ESS.

10.2.1 Enhanced Safety Setting (ESS) Modes

ESS modes of operation are intended to reduce arc energy expended during a fault event and avoid fuse operation by utilizing fast tripping while attempting to maintain an acceptable level of customer service reliability. ESS are designed to clear faults in < 1 second to limit ignitions compared with traditional schemes where clearing times can be 4-10 seconds. PacifiCorp has many different intelligent electric devices on which ESS modes may be placed. These devices act as protective relay devices on the distribution system. Each device has a different set of functions and limitations that may be employed to reduce risk during elevated wildfire risk conditions. At the same time, changes to the reclosing settings of devices can have significant impacts on customer service reliability, which itself poses safety concerns.

The primary method to reduce arc energy is to reduce fault interruption time. The ignition risk of many electrical faults depends on the intensity and duration of the arc that is created. A short interruption time minimizes two critical hazards of an electrical fault: sustained arcing and hot-surface ignition. The shorter the duration of the arc, the less time there is to heat fuels to their ignition temperature and start a fire. Furthermore, total arc energy expended during a system event can be reduced by limiting the number of times the arc may be established. This can be accomplished by adopting a policy of limited reclosing while in an ESS mode. Since reclosing is an important tool for maintaining service reliability, reclosing functionality in certain ESS modes will be influenced by the severity of wildfire risk conditions.

Reliability is enhanced by deploying protective relay devices that automatically sectionalize, such as line reclosers, to protect downstream circuit segments. These devices essentially allow for the selective application of protection modes to tighter sections of a line. Furthermore, increased sectionalization can provide important information about the location of a fault and guide faster restoration efforts. In general, when these elements are in place, ESS modes limit reclose attempts at a circuit breaker; for a line without sectionalizing elements, the fallback is the relay at the substation, which would impact everything downstream of it rather than just a section of the line.

The use of instantaneous overcurrent and definite time protection elements limits the operation of fuses on the distribution system. This is by design, because fused elements require time to operate, and delay is undesirable in the context of wildfire risk. The limitation of fuse operation on the distribution system has a two-fold impact on system protection. First, sensitivity of the overcurrent elements on the protective relays must be evaluated so that these relay elements can provide adequate protection to the end of line. Second, additional fault indication devices are warranted to aid in locating a fault, thereby supporting quicker restoration.

System Coordination in ESS Modes

System coordination in ESS modes is maintained through short time delays. A short time delay allows downstream reclosers on the system to operate before upstream devices have time to respond to faults. With increased sensitivity on the relays and short time delays, downstream fuses are not expected to have time to operate.

Substation relays and recloser controllers on the system that have not yet been upgraded to intelligent electric devices use existing tag and recloser control functions to mitigate wildfire risk. Table 10-1 below shows the common relays currently deployed on PacifiCorp's system and the ESS modes that can be used on specific relays, together with the expected fault operation and coordination outcomes.

While the program and methods used to deploy ESS are continuously evolving, the following table describes the current ESS modes, expected fault operation, reclosing action, coordination with reclosers, and actions to restore depending on the type of equipment installed. Note, there may be variances in expected fault operation and reclosing action depending on the protective device settings. Additionally, changes to the approach outlined below are possible and generally managed through internal Company policies and procedures.

Table 10-1: Current ESS Mode Configurations

Relay	ESS Mode	Expected Fault Operation	Reclosing Action	Coordinates With Reclosers	Action to Restore	Notes
SEL-351	Elevated Fire Risk (EFR)	Trip, Reclose, Trip, Lockout	Yes	Yes	EFR On, Reclose Off	ESS Mode is Tagged/Reclose Off if EFR is not available.
SEL-751	EFR	Trip, Reclose, Trip, Lockout	Yes	Yes	EFR On, Reclose Off	ESS Mode is Tagged/Reclose Off if EFR is not available.
SEL-751A	Tagged/ Reclose Off	Trip, Lockout	No	No	Reclose Off	ESS Mode depends on reclosing switch type: 43RT - Tagged 43R - Reclose Off
SEL-651R2	EFR	Trip, Reclose, Lockout	Yes	Yes	EFR On, Reclose Off	ESS Mode is Tagged if EFR is not available.
SEL-651RA	EFR	Trip, Reclose, Lockout	Yes	Yes	EFR On, Reclose Off	ESS Mode is Tagged if EFR is not available.
Form 3	Reclose Off	Trip, Lockout	No	No	Reclose Off	
Form 4	Reclose Off	Trip, Lockout	No	No	Reclose Off	
Form 5	Tagged	Trip, Lockout	No	No	Reclose Off	
Form 6	EFR	Trip, Reclose, Trip, Lockout	Yes	Yes	Reclose Off	ESS Mode is Tagged if EFR is not available.
Fusesaver	Tagged (Lever down)	Trip, Lockout	No	No	Lever down	
DPU	Tagged/ Reclose Off	Trip, Lockout	No	No	Reclose Off	ESS Mode depends on reclosing switch type: 43RT - Tagged 43R - Reclose Off
DPU2000	Tagged/ Reclose Off	Trip, Lockout	No	No	Reclose Off	ESS Mode depends on reclosing switch type: 43RT - Tagged 43R - Reclose Off
DPU2000R	Tagged/ Reclose Off	Trip, Lockout	No	No	Reclose Off	ESS Mode depends on reclosing switch type: 43RT - Tagged 43R - Reclose Off
Electromechanical	Tagged/ Reclose Off	Trip, Lockout	No	No	Reclose Off	ESS Mode depends on reclosing switch type: 43RT - Tagged 43R - Reclose Off

Reliability Impacts of ESS

Implementing ESS modes on the distribution network can have an impact on customer reliability, as depicted in Figure 10-1. PacifiCorp is exploring different strategic combinations to find the right balance of risk reduction, reliability, and equipment installations. ESS settings, as discussed, leverage a faster isolation scheme to reduce the amount of energy that may be released during an energy release event, which can lead to more frequent and/or sustained outages. For example, if wildfire risk increases due to meteorological conditions associated with greater wildfire risk, alternative ESS operating modes may include reducing the number of reclose attempts or locking open on a single trip event. This may result in what would have been temporary faults becoming sustained outages.

Each outage correlated to a device with ESS settings enabled is considered an event where risk was mitigated through refined settings, since the settings limit the amount of energy released. However, the correlation between ESS settings being enabled and an outage occurring does not mean the settings caused the outage, because it is not clear whether the outage would have occurred regardless of ESS being activated. Outages can be caused by a variety of factors that can coincide with active ESS modes.

To mitigate impacts to reliability from ESS, PacifiCorp does not adjust ESS settings, such as reducing the number of reclose attempts or locking open on a single trip event, for entire fire seasons. Instead, the Company utilizes daily risk assessments, near-term forecasts, and situational awareness reports to apply ESS selectively. This targeted application of ESS allows the Company to achieve key risk reductions while minimizing impacts on reliability. It is important to note that PacifiCorp has a significant amount of ESS equipment in the field that is not remotely operable, and adjusting the settings requires trained personnel to conduct on-site procedures. As the Company's enhanced weather monitoring and situational awareness enable more targeted and selective application of ESS, this may require more frequent ESS adjustments and site visits. Accordingly, as PacifiCorp's ESS usage matures, the Company may need to dedicate more personnel to grid operations and procedures to mitigate fire risk.

To regularly assess and optimize the use of ESS, in 2024, the Company initiated an annual evaluation of circuits placed into ESS and their reliability impacts. This evaluation is further discussed in Section 10.2.7.

General Criteria for Using ESS

PacifiCorp deploys a cross-departmental approach to monitoring meteorological conditions related to wildfire risk and adjusting daily operations of distribution system assets, including implementation of ESS. Figure 10-2 depicts the spectrum of responsive mitigations to near-term heightened wildfire risk. The various information and departments are coordinated by leveraging situational awareness assessments that inform the operational actions across the service territory. These situational awareness reports, also known as the System Impacts Forecast Matrix, are described in Section 8.5.1.

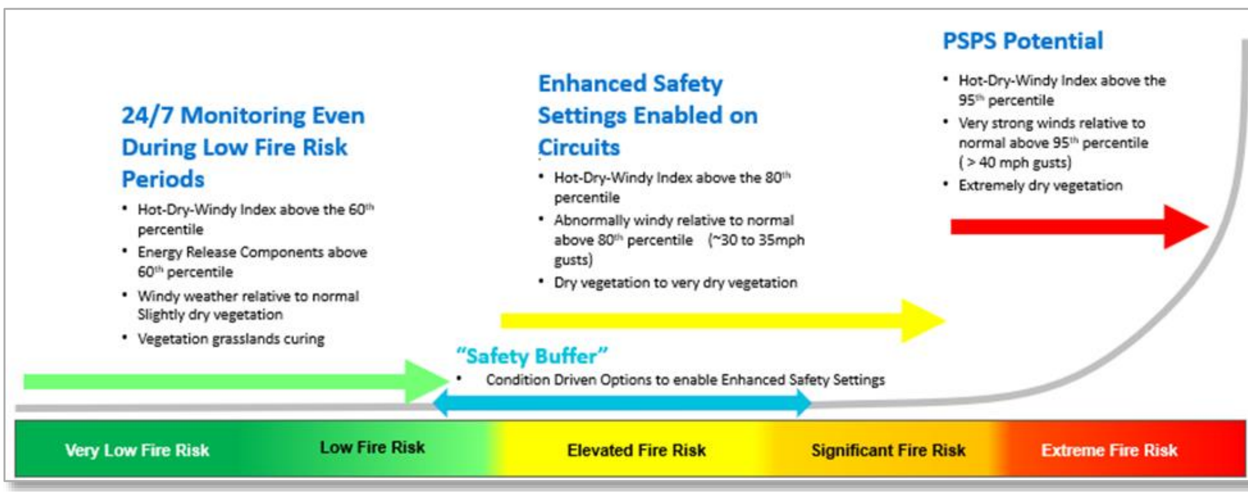


Figure 10-2: Responsive Risk Mitigations

Operational Procedures for Using ESS

Figure 10-3 below illustrates the operational coordination, showing how experts and operators across departments review relevant circumstances, coordinate, and potentially implement ESS. The figure illustrates the daily operational cycle for implementing ESS during elevated fire risk conditions. Emergency Management and Meteorology first identify geographic areas of heightened risk, after which Engineering evaluates network configurations, protection devices, and device-specific ESS capabilities for those areas. T&D Operations and the Control Center then review and execute operational activities, such as outage response, restoration, and documentation based on these ESS and circuit evaluations. As PacifiCorp is continuously improving and evolving its plan and programs, the process below is subject to change and is managed by internal Company policies and procedures.

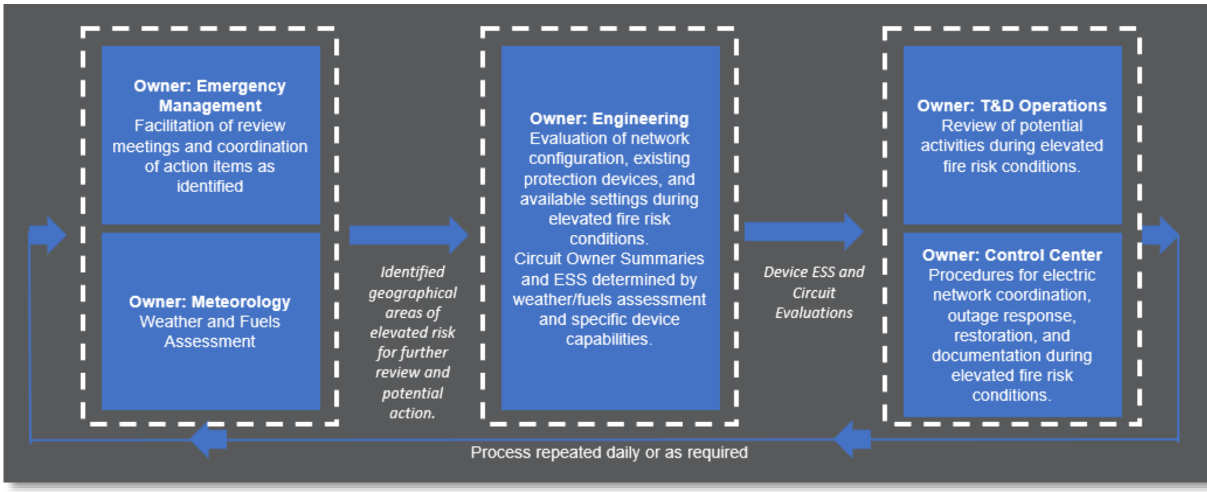


Figure 10-3: Operational Process for ESS Implementation

ESS Capabilities

By leveraging the combination of configurations outlined in Table 13-1, PacifiCorp is able to implement ESS across distribution circuits. Additionally, protective relay devices, such as line reclosers or circuit breaker relays, are currently being upgraded on various transmission and distribution lines throughout PacifiCorp's service territory to enable the more sophisticated ESS modes.

Effectiveness of ESS

In 2025, PacifiCorp began calculating the effectiveness of its ESS program in reducing wildfire risk. The calculation methodology uses ESS activation and ignition data in combination with Pacific Gas & Electrics (PG&E) stratified effectiveness methodology. Based on this methodology, effectiveness is calculated using the following formula:

$$\text{ESS Effectiveness} = \left(1 - \frac{p_1}{p_2}\right) \times 100\%$$

$$\text{Where } p_1 = \frac{\text{count of ignitions with ESS}}{\text{circuit−mile days with ESS}} \text{ and } p_2 = \frac{\text{count of ignitions without ESS}}{\text{circuit−mile days without ESS}}$$

Due to significant changes in the Company's ESS activation policy over the past several years, the current calculation methodology uses ignition and ESS activation data starting in 2025. With less than a year of data available, ESS program effectiveness is still being evaluated. While a preliminary assessment may be available at the end of 2025, refined values will take several years to develop. In the meantime, the Company is planning to continue engagement with peer utilities to identify other opportunities to quantify the effectiveness of ESS at reducing wildfire risk, including joint IOU working meetings and direct benchmarking discussions. This methodology may change as the Company identifies other opportunities and additional data becomes available.

10.2.2 Grid Response Procedures and Notifications

Tracking ID: OR-GO-02

Outage Response

In all circumstances, PacifiCorp's System Operations is the central communications hub of the distribution network. If an outage occurs on the distribution network, Region Operations generally manages the outage response and directs restoration efforts. Similar to the use of ESS, an operator's response may change based on the daily risk assessment. Under elevated wildfire conditions, the operator will coordinate with field personnel to decide if any additional actions are warranted due to particular circumstances. In significant or extreme wildfire conditions, an operator may not restore until after additional patrols are performed as described below.

Re-energization Practices

PacifiCorp also modifies re-energization practices based on risk assessments, requiring a balance between customer reliability and wildfire mitigation. If a breaker or recloser has "locked out"—meaning it has opened and no longer conducts electricity—a system operator or field personnel will test a line to see if it meets conditions/criteria outlined in PacifiCorp operational policies and procedures. To test the line, the system operator or field personnel will close the device, thereby allowing the line to be re-energized. If the fault has cleared, the system will run normally. If the fault is not cleared, the device will lock out again. If the device locks out again, the system operator knows additional investigation or work will be required before the line can be successfully re-energized. Because faults are often temporary, line-testing can be an efficient tool to maintain customer reliability, similar to the use of reclosing described in the previous section. At the same time, line-testing can potentially result in arcing or an emission of sparks if the fault has not yet cleared when the line is tested. After a line is successfully tested, a mainline patrol is required.

10.2.3 Personnel Work Procedures and Training in Conditions of Elevated Wildfire Risk

During fire season, PacifiCorp modifies wires operations and work practices to further mitigate wildfire risk. Additionally, the Company invests in tools and equipment to mitigate wildfire risk.

Modified Work Practices

As a part of the situational awareness reports and briefings prepared by the Meteorology Department, as described in Section 9, PacifiCorp's operations department considers the local weather and geographic conditions that may create an elevated risk of wildfire. These practices are targeted to reduce the potential of direct or indirect causes of ignition during planned work activities, fault response, and outage restoration.

PacifiCorp follows established work practices that require suppression equipment to be carried "between April 1 and December 1 of any year, or at any other time when ground litter and vegetation will sustain combustion permitting the spread of fire, without providing and maintaining, for firefighting purposes only, suitable and serviceable tools in the amounts, manner and location prescribed in this section." The Company also follows local United States Forest Service (USFS) work practice requirements as outlined in their Industrial Fire Precaution Levels. These are issued as forest orders and change depending on the time of year and the forest.

Table 10-2 shows the suppression equipment and common locations.

Table 10-2: Suppression Equipment

Equipment	Location
Truck with 300 Gallon Water Tank	Albany, OR
Truck with 300 Gallon Water Tank	Astoria, OR
Truck with 300 Gallon Water Tank	Enterprise, OR
Truck with 300 Gallon Water Tank	Hood River, OR
Truck with 300 Gallon Water Tank	Klamath Falls, OR
Truck with 300 Gallon Water Tank	Medford, OR
Suppression Trailer	Enterprise, OR
Suppression Trailer	Grants Pass, OR
Suppression Trailer	Medford, OR
Suppression Trailer	Portland, OR
Suppression Trailer	Portland, OR
Suppression Trailer	Grants Pass, OR
Suppression Trailer	Roseburg, OR
Suppression Trailer	Klamath Falls, OR

Figure 10-4 below shows the locations of the suppression equipment for deployment in the field as required or recommended by certain jurisdictional agencies.

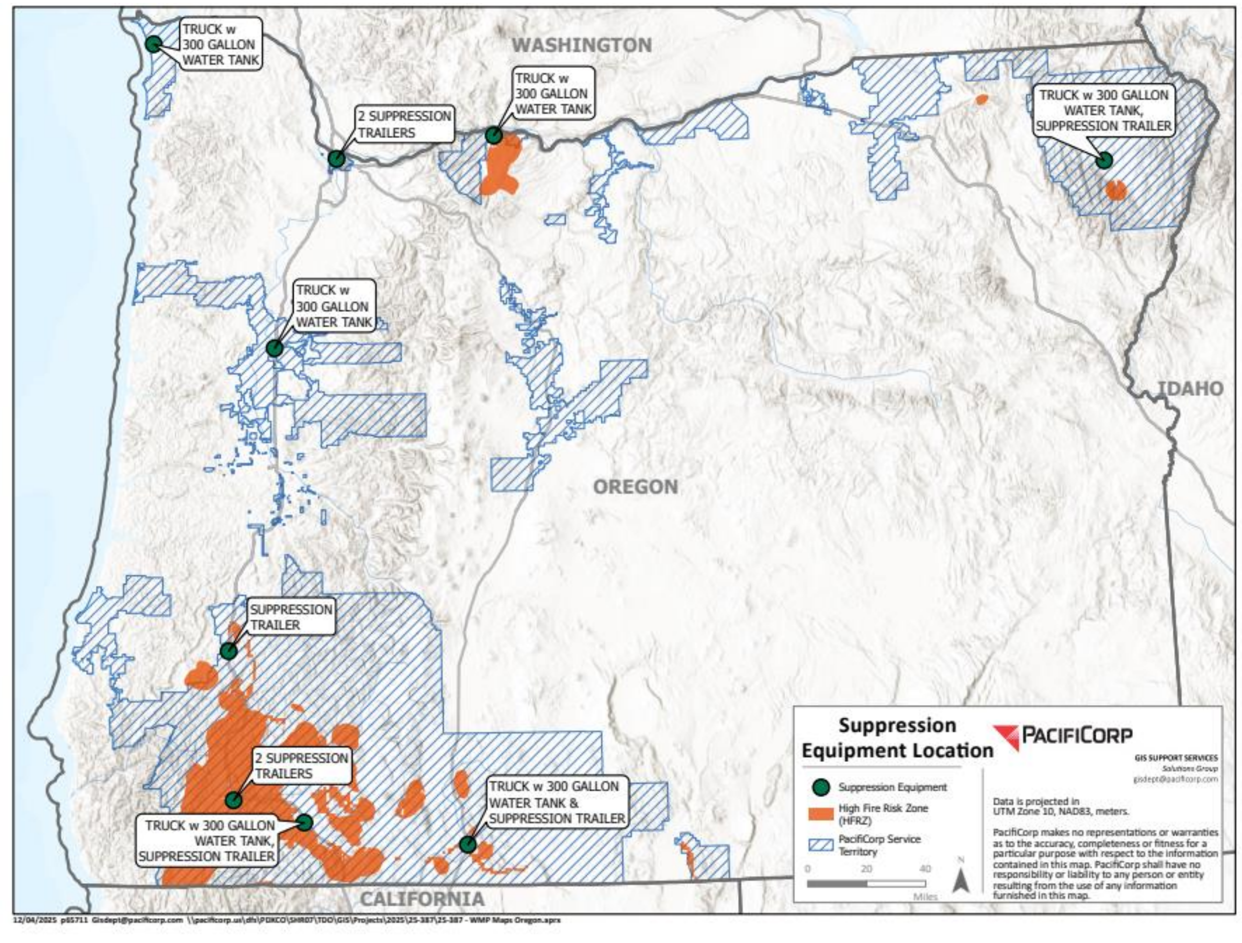


Figure 10-4: Locations of Suppression Equipment

Safety is the first priority for employees. If there is a fire in the immediate area, employees are directed to secure the scene for safety, then evacuate and contact emergency personnel by calling 911. Once they have notified emergency personnel, they contact PacifiCorp's control center.

If a fire is reported near PacifiCorp's equipment, the Company will follow the wildfire response procedures described in Section 11.2.2.

PacifiCorp endeavors to mitigate some wildfire risk by managing the way the Company schedules and performs field work. To effectively manage work during fire season, area managers regularly review local fire conditions and weather forecasts provided to them as part of the Company's monitoring program, which is discussed in Section 9. PacifiCorp is continuously improving and evolving its plan and programs, and the process below is subject to change. When the Meteorology Department forecasts elevated, significant, or extreme wildfire risk conditions, local operations may modify operating practices. For example, certain personal protective equipment and basic firefighting tools are required for any field work during periods of elevated fire risk. Local area management will evaluate whether any hot work modifications are necessary, taking into account multiple factors specific to the circuit's local conditions. If wildfire risk is significant or extreme, local area management will also consider whether any additional work might be appropriate.

The operations performed for each category of wildfire risk potential are summarized in Table 10-3.

Table 10-3: T&D Operations Based on Fire Risk Potential

	Fire Risk Potential		
Practice	Yellow	Orange	Red
Personal Protective Equipment and Tools	✓	✓	✓
Daily Hot Work Evaluation	✓	✓	✓
Additional Work Evaluation		✓	✓
Cancel Hot Work			✓

When a circuit is identified as having elevated wildfire risk or above—classified as yellow, orange, or red—local area management will complete an elevated fire risk work evaluation using a standard checklist form for that purpose.

When a circuit is identified as having extreme wildfire risk or above—classified as red—in addition to the actions above, local area management will cancel planned hot work instead of considering alternatives as part of a hot work evaluation. Potential may exist for instances where hot work is necessary despite extreme wildfire risk, and extensive precautions as outlined above are to be put in place to mitigate the potential threat of ignition. PacifiCorp adheres to all local guidelines and potential restrictions that would be applicable to hot work in a given area.

Additional Resources

To implement some of the wildfire mitigation programs described above, additional labor resources and field personnel time is often required to (a) support system operations in assessing localized risk and administering ESS and (b) respond to outages during fire season with additional patrols and coordination.

Under normal operating procedures, system operators and field personnel work together daily to manage the electrical network. In many situations, system operators depend on field personnel to gather information and assess local conditions. During wildfire season, system operations follow additional procedures related to implementing ESS and restricting line-testing. Consequently, system operators need field personnel to gather information and assess local conditions during fire season more frequently than would otherwise be required under normal operating procedures. The requests from system operators may vary, ranging from a simple phone call to confirm that it is raining in a particular area to a much more time-intensive request, such as a full line patrol on a circuit.

Field personnel may also spend some additional time when responding to an outage during fire season. To mitigate the risk associated with traditional restoration practices, wires operations may perform some amount of line patrol on certain de-energized sections of the circuit, notably during fire season and particularly in the HFRZ, dependent on current conditions at the work site and the duration of the restoration work. Depending on the circumstances, this extra patrol might be done just before or just after re-energizing the line. Typically, this type of line patrol does not involve a close inspection of any particular facility; instead, it is a quick visual assessment specifically targeted to identify obvious foreign objects that may have fallen into the line during restoration work.

10.2.4 Grid Operations and Protocols – Performance Monitoring

Response Tools to Minimize Reliability Impacts

Implementing ESS or other operations protocols for the purpose of wildfire mitigation can result in more frequent outages to customers. While these protocols are sometimes warranted to reduce the risk of wildfire, PacifiCorp recognizes the disruption they can cause to customers and communities.

To reduce these disruptions, PacifiCorp reviews ESS reliability thresholds to define acceptable parameters for protective devices operating under ESS. If a recloser, circuit breaker, or Fusesaver experiences two lockouts in a week, four in a month, or six in a season, it triggers an internal review to assess whether the device's performance is acceptable or if adjustments are needed. This process ensures that ESS maintain wildfire safety while minimizing unnecessary outages and preserving system reliability for the communities PacifiCorp serves. As part of this review, PacifiCorp generally follows a seven-step process that includes analyzing outage history, verifying meteorology and terrain data, adjusting protective device settings, installing additional isolation and communication devices, conducting visual and drone inspections, and expediting wildfire hardening projects.

Patrol time and customer outage duration can be substantially reduced when the fault location, or its approximate location, is identified quickly. PacifiCorp installed fault indicators as shown in Figure 10-5. Regional operators and field personnel use prioritizing circuits that feed into the HFRZ where ESS are most likely to be implemented. When an outage occurs, regional operators and field personnel use these new tools to quickly narrow down potential fault locations, optimizing the deployment of resources and expediting service restoration.

PacifiCorp may install additional fault indicators as needed to balance wildfire mitigation with the impact to customers. See Section 10.2.7 for an analysis of reliability.

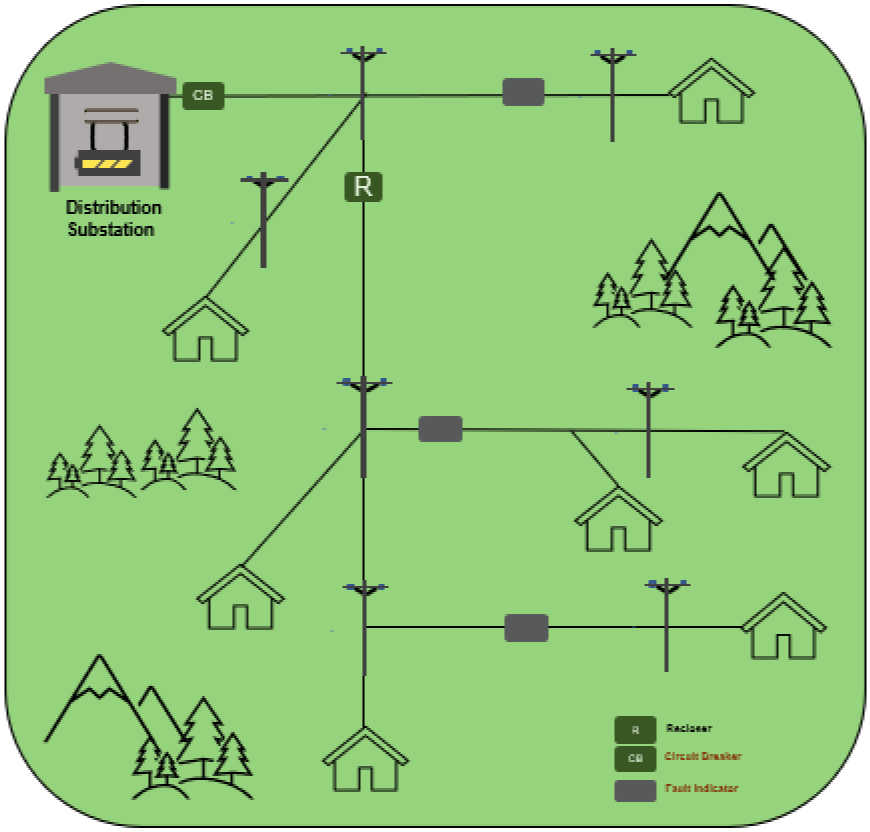


Figure 10-5: General Fault Indicator Location

10.2.5 Grid Operations and Protocols – Other

PacifiCorp has two grid operation protocols not discussed above: emergency de-energizations and public safety power shutoffs (PSPS). These protocols are discussed in Section 11.5.1. ESS, emergency de-energizations, and PSPS are responsive measures for mitigating wildfire risk and are applied according to risk severity and specific circumstances, as outlined below.

For additional information on how the Company conducts near-term fire risk modeling and decides between responsive mitigation options, refer back to Section 9.2.

10.2.6 Other Technologies and Systems

PacifiCorp does not currently have other technologies and systems that are not discussed above.

10.2.7 Quality Assurance/Quality Control

To ensure proper activation of ESS on a protective device, the Company follows a QA/QC process. This process involves receiving direction from the Company's system operations to activate ESS settings, either through SCADA or by working with field operations personnel. When the device must be set by field operations personnel, the system operator uses relay control tables and communicates these orders to the field to make the necessary modifications to the protective device to be ESS activated. During the activation process, field operations personnel will complete a relay mode verification form that records device identification, location, action being taken, and photos of the before/after ESS status of the device. Once the ESS settings have been implemented, field operations personnel will submit a relay mode verification form for the protective device so that it can be reviewed/verified that the device status matches the orders provided by the operator and it matches Company system records.

10.3 Results

In 2025, PacifiCorp conducted an annual evaluation of circuits placed into ESS and their reliability impact. The purpose of this annual evaluation was to identify targeted short-term mitigation projects to support reducing the total number of outages and outage duration experienced on these circuits. This evaluation included a review of the number of outages, average outage duration, frequency of outages, number of customers impacted, and average response time for outages to determine circuits that had the worst reliability impacts. Table 10-4 includes an overall summary of all circuits that were activated in ESS in 2024 and through the third quarter of 2025 and associated reliability impacts. Table 10-5 provides a summary of the top 10 circuits impacted by ESS in the past three years. The circuit highlighted in green has mitigation planned in the 2026-2028 WMP cycle, as shown in Appendix E.

Table 10-4: Reliability Impacts for Circuits Activated in ESS settings

Metric	2024	2025 Through Q3
Number of Outages	2,567	1,646
Average Duration of Outages (minutes)	184.49	184.53
Frequency of Outages per Circuit	9.30	0.15
Number of Customers Impacted	1,056,910	561,073
Average Response Time for Outages (minutes)	67.52	86.46

Table 10-5: Top 10 Impacted Circuits from ESS Settings in the Past Three Years (2023 -2025[12])

Circuit/Circuit Segment ID	Circuit/Circuit Segment Name	Circuit/Circuit Segment Length (overhead circuit miles)	Number of Outages in Past Three Years	Cumulative Outage Duration (Hours)	Cumulative Number of Customers Impacted by Outages
5U84	Little River	107	91	177.09	40,047
5W21	Prairie	67	67	96.03	16,189
5D5	Culver	138.28	65	148.78	25,987
4L16	Langell Vly	199.75	62	187.23	11,898
5R232	Merlin-Hugo	50	61	213.49	19,905
5L57	Crater Lake	155	60	229.55	18,843
4W8	Creighton Lane	113	58	116.08	14,986
5R55	Siskiyou	144.74	55	368.51	21,103
5R284	Stage Rd	81.45	54	258.78	16,542
4R1	Salmon	142	54	185.67	38,006

Figure 10-6 below shows the location of the circuits listed in Table 10-5.

[12] Through the third quarter of 2025.

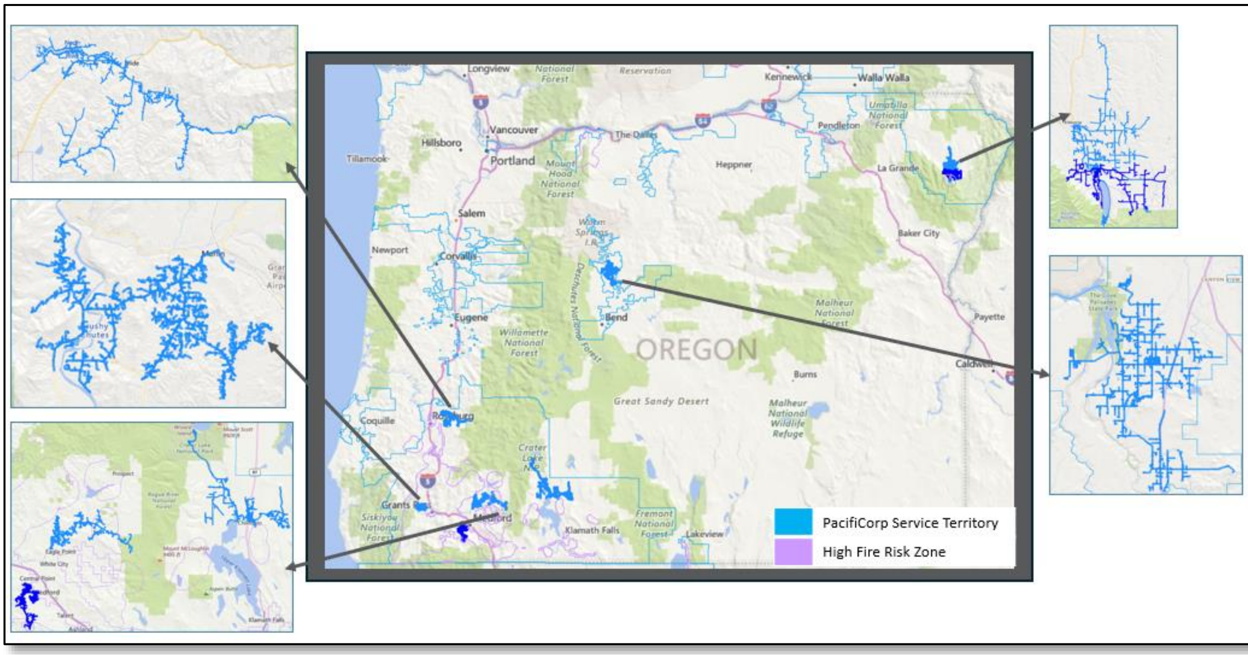


Figure 10-6: Location of the Circuits Most Impacted by ESS 2023-2025

In early 2025, the ESS outages on the top impacted circuits through the end of 2024 were reviewed in conjunction with seasonal risk experienced in 2024 to identify and prioritize near-term mitigation projects for completion prior to the 2025 fire season to reduce wildfire risk and mitigate potential customer reliability impacts associated with the ESS program and mitigation under the ESS System Hardening Initiative OR-GO-01 discussed in Section 6.2.15. Examples of prioritized projects include implementing ESS on existing devices and upgrading cutouts, fuses, crossarms, and insulators on circuits that experienced ESS outages in 2024. ESS hardening was performed on 23 circuits in 2025. The circuits hardened are listed in Table 10-6. The circuits highlighted in green have additional mitigation planned in the 2026-2028 WMP cycle, as shown in Appendix E.

Table 10-6: ESS Hardening Work Completed in 2025 and Subsequent Work Projections for 2026-2028

Circuit	Circuit Name	Substation	Operating District
4M353	West Stayton	Stayton	Albany
5D10	Portland Ave	Bend	Bend
5D120	Chinook	Overpass	Bend
5D226	CF-Terrebonne	Redmond	Bend
5D106	Nez Perce	Overpass	Bend

Circuit	Circuit Name	Substation	Operating District
5R104	Savage Street	Beacon	Grants Pass
5R98	Manzanita	Caveman	Grants Pass
5R99	Caveman	Caveman	Grants Pass
5R123	G Street	Easy Valley	Grants Pass
5L54	Alma	Lakeport	Klamath Falls
5L57	Chiloquin	Chiloquin	Klamath Falls
4L16	Langell Valley	Casebeer	Klamath Falls
5L45	Crystal Springs	Hornet	Klamath Falls
5L43	Dairy	Dairy	Klamath Falls
5L36	Modoc	Modoc	Klamath Falls
5L55	Keno	Hamaker	Klamath Falls
4L50	Rocky Point	Running Y	Klamath Falls
5L27	North	Merrill	Klamath Falls
5L82	East	Tulelake	Klamath Falls
5R66	Four Corner	White City	Medford
5R55	Siskiyou	Oak Knoll	Medford
5R56	Ashland	Oak Knoll	Medford
5W856	Mckay	Mckay	Pendleton

10.4 Initiatives and Targets

In this section PacifiCorp presents its qualitative targets for the 2026-2028 WMP cycle. Discussion of the initiatives is outlined in Table OPUC 10-1.

10.4.1 Initiative Summary Table

Table OPUC 10-1: Grid Operations and Protocols Initiative Cost Summary in Thousands

Initiative Activity	Tracking ID	Target Unit	2026 Target	2026 Forecast ($1,000)	2027 Target	2027 Forecast ($1,000)	2028 Target	2028 Forecast ($1,000)	Three-Year Total ($1,000)	Section
ESS Annual Reliability Impacts Analysis	OR-GO-02	Qualitative	Conduct annual ESS reliability impacts analysis	[redacted]	Conduct annual ESS reliability impacts analysis. Evaluate modifying the analysis in conjunction with advancements in mitigation effectiveness analysis.	[redacted]	Conduct annual ESS reliability impacts analysis. If warranted, implement changes to analysis based on 2027 evaluation.	[redacted]	[redacted]	10.2.2

Annually, PacifiCorp will review the reliability impacts of ESS, similar to what is described in Section 10.3, and determine if there should be adjustments to the analysis based on the annual results and, over time, advancements in the mitigation effectiveness analysis. Analysis is performed by the Real Time Engineering Department as part of their regular work.

10.5 Continuous Improvement

As discussed throughout this section, modifying grid operations and protocols can help mitigate wildfire risk, although this often involves tradeoffs with reliability. PacifiCorp's infrastructure advancements can help mitigate reliability impacts by creating smaller, more targeted sections of the grid to apply ESS, de-energization, or PSPS protocols. Other technologies that have been deployed by PacifiCorp enable more precise fault locating, which can curtail fault remediation response times and offset the reliability impacts of ESS. As the Company continues to expand and refine its remote grid control and automation capacities, enabling key responsive measures to elevated fire risks, it will continually monitor these impacts on reliability. Using data-driven analyses like the ones discussed in Sections 10.2.7 and 10.4 will help PacifiCorp track reliability impacts and target utility actions to minimize disruptions to customers who are being especially affected by wildfire-related grid operations and protocols.

11. Emergency Preparedness

11.1 Overview

PacifiCorp's response to emergencies that affect customers, employees, assets, or business continuity includes procedures that apply the principles of the National Incident Management System (NIMS), developed to support emergency responses of any size or scope. These procedures clearly define roles, responsibilities, and communication strategies for an event.

11.2 Strategy and Response

11.2.1 Customer Support in Wildfire Emergencies

PacifiCorp has implemented policies and procedures to ensure a timely response to emergency outages and to coordinate the necessary personnel and resources to ensure timely restoration of utility service.

Overview

Critical customers are those who rely on PacifiCorp to provide electrical power for the vital sustainment of life or an essential service to a community. Critical customers may also include large-revenue customers who are important financially to both the Company and the community. Specifically, PacifiCorp serves following three described categories of critical customers:

1. **Access and Functional Needs (AFN) Customers:** These are individuals who are at an increased risk of harm to their health, safety, and independence during outages. This includes, but is not limited to, customers who depend on electrical power to maintain machinery or equipment vital to sustainment of life. This may include dialysis machines, breathing apparatuses, or other critical medical equipment needed.
2. **Critical Infrastructure Customers:** These are customers who use electrical power to provide an essential service to a community. These customers could include police, fire, hospitals, airports, television, and radio stations. The locations and specific requirements of these customers are determined and tracked locally, and these customers are given priority, as practical, during restoration efforts. These customers usually have some type of backup generation that automatically engages when there is a loss of power.
3. **Strategic Customers:** Strategic customers are typically large-revenue customers who are important financially to both the community and the Company. Typically, these customers are manufacturing plants, but they also may be government installations, municipalities, or other

entities. These customers may have backup or self-generation that allows them to continue all or part of their activities upon loss of utility power. These power systems, if they feed into the Company's local system, are already coordinated with the utility prior to any disaster. Strategic customers are assigned to regional business managers (RBMs) who should be involved with all contact with these customers before, during, and after an emergency.

The support resources for customers are described below.

Outage Reporting: In reporting outages, PacifiCorp will continue its customer outage management protocols and real-time outage maps as shown in Figure 11-2 to inform customers about the presence and location of outages as well as the estimated restoration plans.

Customer Protections: PacifiCorp's support for customers during emergencies includes the following efforts:

- Consistent with OAR 860-021-0406(1) and (2), PacifiCorp will make best efforts not to disconnect customers for nonpayment on any day when a customer is under a Level 2 ("Set") or 3 ("Go") evacuation notice due to wildfires, or on the day after a Level 2 or 3 evacuation order has been lifted.
- Consistent with OAR 860-021-0406(3), if electric service was disconnected for nonpayment 72 hours prior to a wildfire evacuation, customers may contact PacifiCorp to request reconnection of service after the evacuation order has been lifted, and the Company will make its best efforts to reconnect the customer.
- Consistent with OAR 860-021-0407, PacifiCorp will implement a severe weather moratorium on disconnection of residential and small commercial customers for nonpayment.

AFN Self-Certification and the Medical Certificate Program: PacifiCorp uses multiple pathways to identify AFN customers. Customers may self-identify during interactions with customer service representatives or via the Company's AFN Self-Certification webform. Additionally, customers with serious health conditions who could be aggravated by a loss of power in their home or who require electricity-powered medical equipment in the home can enroll in PacifiCorp's Medical Certificate Program.

Medical Backup Electric Power Rebate Program: PacifiCorp offers Oregon customers enrolled in the Company's Medical Certificate Program a rebate with the purchase of a portable power station, battery, or permanent backup generator to support customer readiness and resilience. Additional information can be found in Section 12.2.6.

Community-Based Organizations: PacifiCorp's emergency management and regional business managers (RBMs) routinely coordinate with community-based organizations and other organizations that provide key services to the community such as hospitals, public health, and organizations that serve the disability community. Emergency management and RBMs serve as a source of information to and from these community partners, including information about Company programs for AFN customers. The types of community-based organizations and agencies that PacifiCorp may work with include:

- Non-profit organizations
- Food banks
- Faith-based organizations
- Community development organizations
- Community support groups
- Local government partners
- Tribal partners

Repair Processing and Timing: As soon as reasonably practicable, PacifiCorp assesses the premises of affected customers whose utility service had been disrupted or degraded, and, if applicable, the meter is removed. Every attempt is made to have service available to the customer immediately after the emergency is over. Additionally, the amount of time from when the customer requests restoration of service to when the service is restored is tracked.

Access to Utility Representatives: PacifiCorp will directly contact customers with damaged facilities after the meter is removed from the damaged property and will expedite any work required to reinstate electrical service. Additionally, PacifiCorp will closely coordinate with local agencies to facilitate any permitting requirements and ensure work is completed as quickly as practical.

11.2.2 Protocol for Emergency Preparedness

PacifiCorp monitors and supports the response to active wildfires occurring near its assets and within its service territory. While employees may carry small fire suppression tools as part of their preparedness, as described in Section 10.2.3, they are not professionally trained firefighters. If a fire of significant magnitude is encountered, employees are instructed to prioritize safety and contact emergency services by dialing 911.

Tracking ID: OR-EP-08

Wildfire Response

To address the growth in wildfire and wildfire risk, PacifiCorp established a Wildfire Intelligence Center (WIC). Modeled after the best practices and insights of California IOUs, the WIC is comprised of individuals who monitor live events and provide situational awareness and operational support. The team analyzes information against a threat of incident complexity matrix to determine if a situation meets a threshold of action. The WIC provides 24/7 staffing with a focus on wildfire. Additionally, the Company is nearing initial developmental completion of its all-hazard monitoring program with implementation set for 2026.

Historically, the Company responded to active wildfires after receiving notification from 911 or other agencies. In cases where the first notification was from 911, PacifiCorp would dispatch personnel to the site and provide information on the situation.

Advances in early detection technologies have allowed the Company to take a more proactive role in threat assessment of an incident as it evolves. Having dedicated staff with the skillset and background to monitor and receive alerts from camera networks, fire agency dispatch, and social media alerts at the earliest warning better positions the Company to determine the need for action while prioritizing public safety, protecting equipment. and maintaining electric service.

Operational Flow for Wildfires

For active wildfires, PacifiCorp follows a structured operational process, as illustrated in Figure 11-1 below. Upon identification of a fire, monitoring and response protocols are initiated. The WIC confirms the fire status with first responders and, if necessary, produces a fire simulation using FireSim, which is part of the WFA-E suite of software tools described in Section 9.2.5.2. If the fire presents a significant threat to infrastructure or public safety, the WIC consults the Wildfire Encroachment System Operations Procedure, SOP-203, to evaluate the need for de-energization. If immediate action is required, the process ensures that de-energization occurs swiftly to mitigate wildfire risks. Notifications are sent to internal operations management using AlertMedia, and stakeholders, including management, are informed of ongoing actions and decisions. Throughout the event, continuous monitoring of the fire ensures a coordinated and effective response to minimize risks, protect public safety, and support restoration efforts as needed.

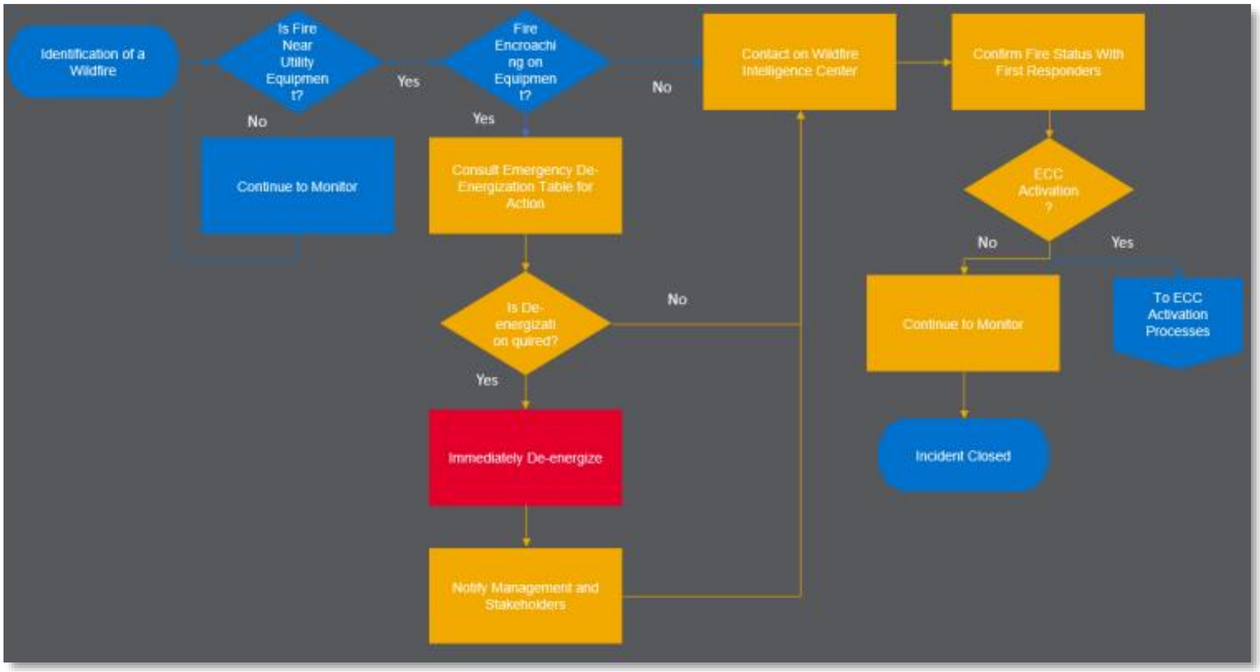


Figure 11-1: Example Wildfire Operational Flow Diagram Overview

Notification and Communication

Notification of and communication to customers during and after a wildfire are detailed in Section 11.2.5.

11.2.3 Public Safety Partner Collaboration and Coordination

PacifiCorp defines a public safety partner as an organization, agency, or entity that collaborates with public safety agencies such as police, fire departments, and emergency medical services to enhance safety, security, and disaster response. Partners include, but are not limited to:

- Emergency responders at the local, state, and federal level
- Water, wastewater, and communication service providers
- Energy providers (electricity, natural gas, fuels)
- Local, county, or state emergency managers
- Members of the Oregon Emergency Response System Council (OERS)
- Telecommunications providers

- Water agencies
- Other disciplines as determined

PacifiCorp participates in multiple public safety partner meetings and workshops throughout the calendar year across its service territory. Meetings include monthly, quarterly, and annual county and state emergency management partner meetings, in addition to pre- and post-fire season collaboration meetings with local, state, and federal fire suppression agencies. These informal discussions are designed to orient participants to a new concept or procedure and continue fostering key working relationships.

Incident Response

Tracking ID: OR-EP-06, OR-EP-07

The goal is for PacifiCorp's emergency managers to notify local authorities, emergency management services, and stakeholders as early as possible in advance of an incident or potential event that could result in a power outage due to wildfire or other type of incident. PacifiCorp's fire and emergency response managers provide resource support during wildland fires; the response managers fulfill the role of agency representatives and serve as the primary point of contact with incident management. Fire and emergency response managers work with the WIC to validate threats, issues, and concerns and are strategically located in the Company's operational areas.

For discussion of public safety partner collaboration during a PSPS, please see Section 12.2.3.

11.2.4 Preparedness and Planning for Service Restoration

Tracking ID: OR-PS-02

PacifiCorp engages a flexible and dynamic central coordination function that is activated for emergency events, including wildfire, which may require additional coordination and resources beyond the capabilities of everyday business operations. Most emergencies or events that require enhanced response begin at the operations level, and a standardized response structure can be scaled and adapted to meet the needs of each incident.

In the event of emergency de-energization, if onsite response can confirm there is no fire threat to Company assets, or if the system operator checklist for re-energization can be affirmed, re-energization can be authorized. A power delivery director or an identified delegate may also approve re-energization in these instances.

Mutual Aid

Timely restoration requires significant logistical expertise, skilled line workers and assessors, and specialized equipment on a large scale. Mutual assistance is an essential part of the energy industry's contingency planning and restoration process. Utility companies impacted by a major outage event are able, under mutual assistance, to increase the size of their workforce by requesting mutual assistance from other companies. When called upon, PacifiCorp will send skilled restoration workers along with specialized equipment, oversight management, and support personnel to assist the restoration efforts of a fellow electric/gas service company. Crew members who deploy mutual assistance are provided just-in-time training at the pre-deployment briefing.

The primary goal of the mutual assistance program is to restore service in a safe, effective, and efficient manner. The program also serves additional objectives that benefit the entire energy industry. These include:

- Promote the safety of employees and customers
- Strengthen relationships among utility companies
- Provide a means for utility companies to receive competent, trained employees and contractors from other experienced companies
- Provide a predefined mechanism to share industry resources expeditiously
- Mitigate the risks and costs of member companies related to major incidents
- Proactively improve resource-sharing during emergency conditions

- Share best practices and technologies that help the utility industry improve its ability to prepare for, and respond to, emergencies
- Promote and strengthen communication among regional mutual assistance groups and other mutual assistance agreements
- Enable a consistent, unified response to emergency events

11.2.5 Public Emergency Communication Strategy

Tracking ID: OR-CO-05

Messaging

PacifiCorp follows a comprehensive communications process internally for coordination before, during, and after an incident, with communication redundancies in place. This process leverages the joint information team (JIT) model, ensuring streamlined messaging across key roles and functions, including the JIT lead/public information officer (PIO), RBMs, customer service, regulatory coordinator, AFN coordinator, and Tribal and government affairs coordinator. Processes and procedures are in place for notifying stakeholders, including the general public, priority essential services, public safety partners, Tribes, and populations with limited English proficiency. The JIT lead/PIO develops accurate, accessible, and timely information for press and media briefings related to power supply and customer safety. The JIT lead also prepares and attends media briefings, providing summaries and messaging templates as part of the JIT structure.

The relevant RBM coordinates with community leaders, non-governmental organizations, business leaders (managed accounts), and political leaders at the city and county levels.

Customer service (Mission Control) uses an automated integrated voice response system to communicate with impacted customers through their preferred method of communication, including phone calls, texts, or emails. It also manages social media and website content during the event.

Strategy

PacifiCorp outlines its procedures for developing effective messaging to reach the largest percentage of stakeholders in its service territory before, during, and after a wildfire, an outage caused by wildfire, or a PSPS event. The Company's communication strategy prioritizes accessibility, clarity, and inclusiveness to ensure critical information reaches all audiences. The messaging strategy incorporates the following elements:

- **Alert and Notification Schedules:** Notifications are issued in a timely manner, ensuring stakeholders are informed well in advance of potential events and updated regularly throughout the duration of the incident.
- **Translation of Notifications:** Recognizing the diverse linguistic needs within the service territory, all notifications are translated into Spanish. PacifiCorp ensures translated materials maintain accuracy and cultural sensitivity, targeting populations with limited English proficiency effectively.
- **Messaging Tone and Language:** Messaging is crafted to be clear, concise, and appropriate to the situation, using plain language to avoid confusion. Tone is empathetic and informative, balancing urgency with reassurance.

Key Components and Order of Messaging Content: Communication is structured to prioritize the most critical information first. Messages follow best practices for emergency communications. By addressing these aspects, PacifiCorp ensures that its communication strategy effectively informs and engages stakeholders before, during, and after wildfire events, power outages, or PSPS incidents.

PacifiCorp uses a variety of outreach methods for customers and communities for notification of wildfires and outages due to wildfires. Table 11-1 outlines PacifiCorp's protocols for stakeholder communications during wildfires and wildfire-related outages, with further explanation below the table.

Table 11-1: Protocols for Emergency Communication to Stakeholder Groups

Stakeholder Group/Target Community	Event Type	Methods for Communicating	Means to Verify Message Receipt	Interests or Concerns Before, During, and After Wildfire and Emergency Events
General public	Wildfire	Media release/interviews (where appropriate), social media, website, standard customer notification based on customer communications preferences	Social media/media releases verified on the Company website and social media channels; customer notifications (call, email, phone) verified/tracked through customer notification tool	Where to learn more information, steps to take to be prepared during an outage
General public	Wildfire-related outage	Media release/interviews (where appropriate), social media, website, standard customer notification based on customer communications preferences	Social media/media releases verified on the Company website and social media channels; customer notifications (call, email, phone) verified/tracked through customer notification tool	Where to learn more information, steps to take to be prepared during an outage
General public	Restoration of service	Media release/interviews (where appropriate), social media, website, standard customer notification based on customer communications preferences	Social media/media releases verified on the Company website and social media channels; customer notifications (call, email, phone) verified/tracked through customer notification tool	Where to learn more information, how to contact PacifiCorp for restoration issues
Priority essential services	Wildfire	Emergency management personnel, public safety partners, ESF-12, RBMs	Customer notifications (call, email, phone) verified/tracked through customer notification tool and direct outreach from emergency management or RBM	Will generator support be provided for facilities if they do not have generators.
Priority essential services	Wildfire-related outage	Emergency management personnel, public safety partners, ESF-12, RBMs	Customer notifications (call, email, phone) verified/tracked through customer notification tool and direct outreach from emergency management or RBM	Will generator support be provided for facilities if they do not have generators.
Priority essential services	Restoration of service	Emergency management personnel, public safety partners, ESF-12, RBMs	Customer notifications (call, email, phone) verified/tracked through customer notification tool and direct outreach from emergency management or RBM	Will generator support be provided for facilities if they do not have generators.
AFN populations	Wildfire	Media release/interviews (where appropriate), social media, website, standard customer notification based on customer communications preference	Social media/media releases verified on the Company website and social media channels; customer notifications (call, email, phone) verified/tracked through customer notification tool	Programs to support medical/AFN customers, update contact information, steps to take to be prepared for an outage
AFN populations	Wildfire-related outage	Media release/interviews (where appropriate), social media, website, standard customer notification based on customer communications preferences	Social media/media releases verified on the Company website and social media channels; customer notifications (call, email, phone) verified/tracked through customer notification tool	Programs to support medical/AFN customers, update contact information, steps to take to be prepared for an outage
Populations with limited English proficiency	Wildfire, wildfire-related outage, restoration of service	Media release/interviews (where appropriate), social media, website translated content in key languages: English, Spanish, standard customer notification based on customer communications preferences (or all available channels in a PSPS)	Social media/media releases verified on the Company website and social media channels; customer notifications (call, email, phone) verified/tracked through customer notification tool	Limited awareness of PacifiCorp's de-energization process, including restoration and how the Company communicates with customers and communities; how to contact PacifiCorp for restoration issues
Tribes	Wildfire, wildfire-related outage, restoration of service	Emergency management personnel, public safety partners, ESF-12, RBMs, media release/interviews (where appropriate), social media, website, standard customer notification based on customer communications preferences (or all available channels in a PSPS)	Customer notifications (call, email, phone) verified/tracked through customer notification too and direct outreach from emergency management or RBM	Limited awareness of PacifiCorp's de-energization process, including restoration and how the Company communicates with customers and communities; how to contact PacifiCorp for restoration issues

If there is time before an emergency de-energization:

- The Company will notify customers that emergency de-energization is pending. This notification is sent by text, email, or phone based on the customer's outage notification preferences that they established in PacifiCorp's customer care system.
- Critical facility customers will receive specific notifications.
- Public safety partners will be notified by PacifiCorp emergency managers of the pending de-energization.
- If the equipment is de-energized, PacifiCorp will notify customers about the outage. This notification is sent by text, email, or phone based on the customer's outage notification preferences they established in PacifiCorp's customer care system.
- After the de-energization, customers will receive regular notifications regarding the outage based on the expected duration of the outage and will receive notification when service is restored.

If there is no time before the equipment de-energization:

- The Company will notify customers about the outage once it occurs. This notification is sent by text, email, or phone based on the customer's outage notification preferences they established in PacifiCorp's customer care system.
- Critical facility customers will receive notification from their RBM.
- PacifiCorp emergency managers will notify public safety partners of the de-energization.
- After the de-energization, customers will continue to receive regular notifications regarding the outage based on the expected duration of the outage and will receive notification when service is restored.

Figure 11-2 is an example of PacifiCorp's outage map, with icons that show if an outage is due to an emergency de-energization for wildfire. The outage map also shows the number of customers impacted by the outage, the status of the outage, when the outage was first reported, and the estimated time of restoration for the outage.

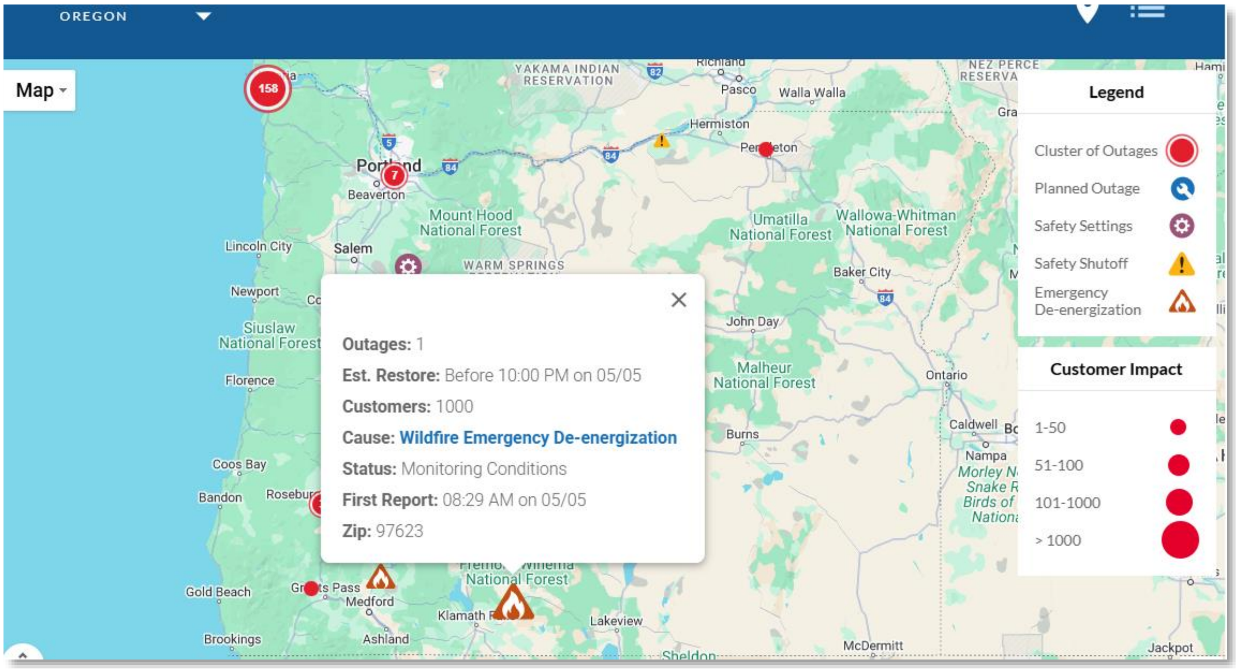


Figure 11-2: Example of Emergency De-energization Information on PacifiCorp Outage Map

11.2.6 Public Safety Portal

Tracking ID: OR-EP-03

PacifiCorp recognizes the importance of providing additional geographical details of areas that may be affected by a PSPS event. In 2024, the Company implemented the Public Safety Partner (PSP) Portal. The PSP Portal is a secure web-based application that hosts key information about customers whose facilities or infrastructure have been identified as critical. This information includes, for example, the location, primary/secondary contact information, and backup generation capabilities of critical customers. Public safety partners can access the portal during PSPS events to receive real-time updates and request support for critical facilities that may be affected by an outage. In addition to enhancing coordination with local public safety partners during emergencies, the PSP Portal also enhances PacifiCorp's ability to prioritize power restoration, backup power evaluation, additional communications, and allocation of other resources before and during PSPS events to critical facility customers.

Registered critical facilities and infrastructure customers that provide services that are essential to public safety are eligible for prioritized restoration, backup power evaluation, additional communications, and other resources before and during PSPS events and emergency de-energizations. Critical facilities can register on the PSP Portal as well. The critical facilities and infrastructure webpage demonstrates the following industry sectors that may register as a public safety partner or critical infrastructure and facility to access the PSP Portal:

- Chemical (facilities associated with the provision of manufacturing, maintaining, and distributing hazardous materials and chemicals, petroleum refineries)
- Communications (communication carrier infrastructure)
- Emergency services (police, fire, emergency operations centers, public safety answering points, Tribal government emergency services)
- Energy (public and private utility facilities vital to maintaining or restoring normal service)
- Food and agricultural (emergency feeding organizations as defined in 7 U.S.C. § 7501, food banks, food pantries, soup kitchens)
- Government facilities (schools, jails and prisons, homeless shelters, community centers, senior centers, independent living centers, voting facilities and tabulation centers)
- Healthcare and public health (public health departments, medical facilities such as hospitals, skilled nursing, nursing homes, blood banks, etc., cooling and warming shelters, temporary public health facilities)
- Transportation (facilities associated with automobile, rail, aviation, major public transportation and maritime transportation for civilian and military purposes, traffic management systems)
- Water and wastewater systems (facilities associated with the provision of drinking water and processing wastewater)
- Other organizations as determined

PacifiCorp emergency managers maintain regular contact with public safety partners in the areas they support throughout the service territory and with the Oregon Department of Emergency

Management (ODEM). It is the responsibility of registered public safety partners to keep their contact information in the portal current. Figure 11-3 depicts what PSP Portal users see when they access the tool.

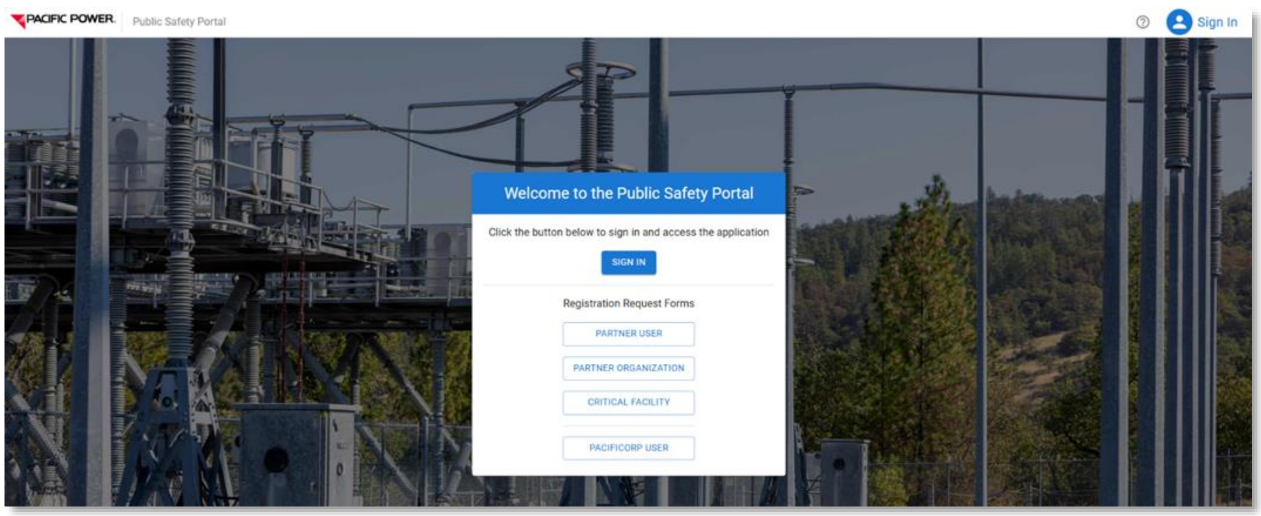


Figure 11-3: Public Safety Partner Portal Home Page

11.3 Results

Public Safety Partner Collaboration and Coordination

Since the last WMP submission, PacifiCorp emergency management has extended communications to partners to learn more about how to best reach communities and plans to improve outreach as updated partner information becomes available.

Wildfire Intelligence Center

Tracking ID: OR-EP-08

The WIC became operational for the 2025 wildfire season. The team is responsible for monitoring situational awareness with the goals of early detection, rapid resource deployment, and improved customer notification. Figure 11-4 illustrates the number of Oregon wildfires observed through September in 2024 and 2025, compared to the number of de-energizations over the same period. The WIC monitored significantly more wildfires in 2025 compared to 2024 when there was not a dedicated team in place. Additionally, due to the capability of the WIC to monitor and provide situational awareness of forecast fire spread and suppression response, there were fewer emergency de-energizations in 2025 compared to 2024.

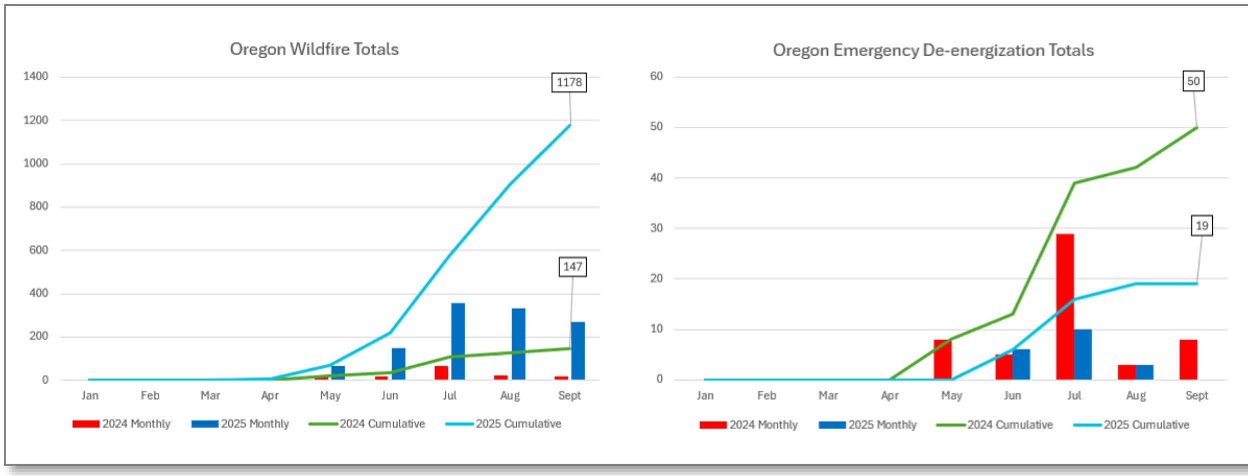


Figure 11-4: Incident Monitoring and De-energizations

Incident Response

Tracking ID: OR-EP-06

As described in Section 11.2.3, PacifiCorp's fire and emergency response managers provide resource support during wildland fires and other events, allowing for the sharing of valuable information with the WIC to validate threats, issues, and concerns. This year, fire and emergency response managers spent 166 days assigned in Oregon serving as PacifiCorp's representative to incident command and providing resource support to transmission and distribution operations.

Public Safety Partner Portal

Tracking ID: OR-EP-03

In 2025, PacifiCorp hosted four external training sessions for its public safety partners on the PSP Portal. These sessions included instruction on the portal access and registration processes and provided an overview of site navigation and notification preferences. Feedback was generally positive, but the Company will continue to seek feedback and comments going forward.

11.4 Initiatives and Targets

11.4.1 Initiative Summary Table

In Table OPUC 11-1, PacifiCorp presents its 2026-2028 emergency preparedness initiatives and targets, which are described below.

Table OPUC 11-1: Emergency Preparedness Initiative Cost Summary in Thousands

Initiative Activity	Tracking ID	Target Unit	2026 Target	2026 Forecast ($1,000)	2027 Target	2027 Forecast ($1,000)	2028 Target	2028 Forecast ($1,000)	Three-Year Total ($1,000)	Section Number
PSP Portal	OR-EP-03	Qualitative	N/A	[redacted]	Security improvements and user experience improvements	[redacted]	Reporting improvements	[redacted]	[redacted]	11.2.6, 11.3, 11.5.2
Emergency Management Team	OR-EP-06	N/A	N/A	[redacted]	N/A	[redacted]	N/A	[redacted]	[redacted]	11.2.3, 11.3, 12.2.3
Emergency Response Team	OR-EP-07	N/A	N/A	[redacted]	N/A	[redacted]	N/A	[redacted]	[redacted]	11.2.3
WIC (Wildfire Intelligence Center)	OR-EP-08	N/A	N/A	[redacted]	N/A	[redacted]	N/A	[redacted]	[redacted]	11.2.2, 11.3, 11.4.1, 11.5.1

In the 2026-2028 WMP cycle, PacifiCorp will continue to develop the PSP Portal and train public safety partners on portal use. Based on public safety partner feedback, the Company will identify user experience improvements. In addition, PacifiCorp will improve security and internal reporting on the PSP Portal.

PacifiCorp's Emergency Management team, Emergency Response team, and WIC will continue to perform their responsibilities as described in Section 11.2 to prepare for and respond to emergencies and provide situational awareness of emerging and ongoing incidents.

11.5 Continuous Improvement

11.5.1 Protocol for Emergency Preparedness

Wildfire Intelligence Center

Tracking ID: OR-EP-08

As described in Sections 11.2.2 and 11.3, PacifiCorp established and stood up the WIC in 2025 to address growing wildfire risk, and by the end of 2025, the WIC has moved to a 24x7 operation. Utilizing insights from the WIC, PacifiCorp's WIC will complete a lessons learned review following each fire season; it will look to improve situational awareness tools and processes through continued coordination with other utilities, emergency response organizations, and technical vendors.

11.5.2 Public Safety Portal

Tracking ID: OR-EP-03

PacifiCorp intends to continually evaluate opportunities that improve the experience of PSP Portal users, as indicated in Table OPUC 11-1, and train public safety partners on portal use. Based on PSP Portal user feedback, the Company will identify user experience improvements.

12. Public Safety Power Shutoff

12.1 Overview

PacifiCorp recognizes the best way to reduce the impact of PSPS events is to reduce their number, geographic scope, and duration. The Company also recognizes that a PSPS may be necessary when there is an extreme fire risk due to strong winds, extremely dry vegetation, and the hot-dry-windy index. Figure 12-1 shows the risk-based approach to determining when a PSPS may be necessary.

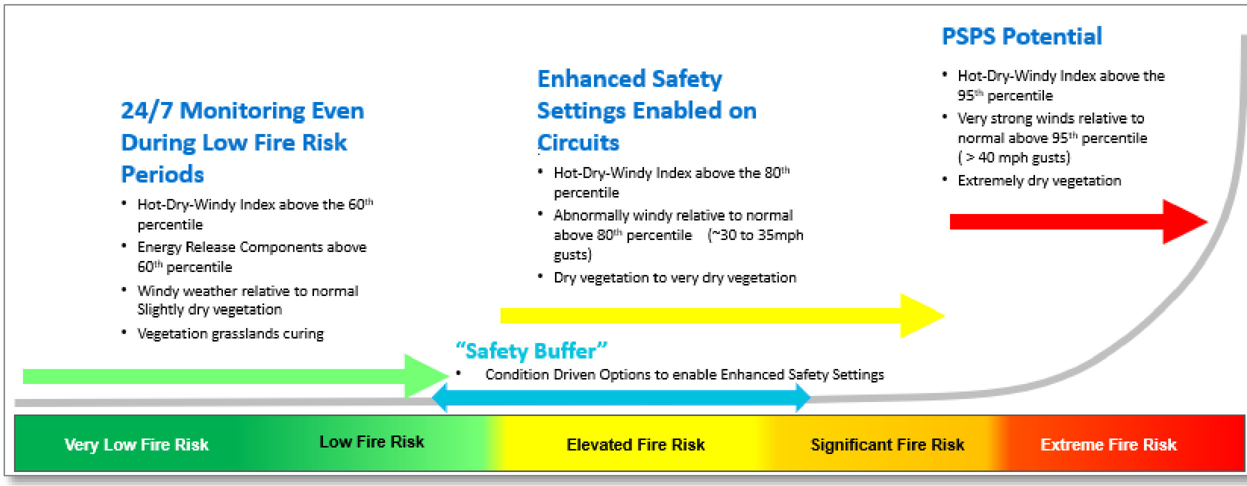


Figure 12-1: PacifiCorp's Risk-based Approach to Operational Practices Such as PSPS

As described in Section 9.2.5.2, PacifiCorp uses Technosylva's FireRisk to model fire risk across its service territory and FireSim to model on-demand fire spread potential. Improved situational awareness initiatives such as the PSPS Circuit Forecast Editor, discussed in Section 9.2.8, support the PSPS decision-making process by identifying the specific circuits or ZOPs that are most at risk of meeting the PSPS criteria. This additional data and sophisticated situational awareness better inform decision-making, reducing the likelihood that a PSPS will be unnecessarily executed.

Customer support programs specifically implemented to reduce the impact of a PSPS event to vulnerable customers include the Medical Backup Electric Power Rebate Program, discussed in Section 12.2.6. Additionally, PacifiCorp continues to review its process for opening community resource centers (CRC) for communities impacted by a PSPS, as discussed below in Sections 12.2.1 and 12.2.7.

12.2 Strategy and Response

12.2.1 Customer Support in PSPS

PacifiCorp has implemented policies and procedures to ensure a timely response to emergency outages and to coordinate the necessary personnel and resources to ensure timely restoration.

Overview

As discussed previously in Section 11.2.1, critical customers are those who rely on PacifiCorp to provide electrical power for the vital sustainment of life or essential service to a community or are large-revenue customers who are important to both the community and the Company. PacifiCorp serves three categories of critical customers:

- **Access and Functional Needs (AFN) Customers:** As defined in OAR 411-425-0055, Access and functional needs populations includes individuals with developmental disabilities, physical disabilities, chronic conditions, limited English proficiency and low income. These are individuals who are at an increased risk of harm to their health, safety, and independence during a PSPS. This includes, but is not limited to, customers who depend on electrical power to maintain machinery or equipment vital to sustainment of life. This may include dialysis machines, breathing apparatus, or other critical medical equipment needed. For AFN populations, PacifiCorp makes PSPS notifications via personal phone calls and in-person welfare checks, when possible, if unable to reach the customer via phone, PacifiCorp makes every attempt to restore power to these customers as quickly as possible.
- **Critical Infrastructure Customers:** These are customers who use electrical power to provide an essential service to a community. These customers could include police, fire, hospitals, airports, television, and radio stations. The locations and specific requirements of these customers shall be determined and tracked locally, and these customers shall be given priority, as practical, during restoration efforts. These customers usually have some type of backup generation that automatically engages when there is a loss of power.
- **Strategic Customers:** Strategic customers are typically large-revenue customers who are important financially to both the community and the Company. Typically, these customers are manufacturing plants, but they also may be government installations, municipalities, or other entities. These customers may have backup or self-generation that allows them to continue all or part of their activities upon loss of utility power. These power systems, if they feed into the

utility's local system, are already coordinated with the utility prior to the disaster. Strategic customers are assigned to RBMs who are involved with all contact with these customers before, during, and after an emergency.

The support resources for customers are described below.

Outage Reporting: Also demonstrated in Section 11.2.1, in reporting outages, PacifiCorp will continue its customer outage management protocols and real-time outage maps as shown in Figure 11-2 and in Figure 12-6 to inform customers about the presence and location of outages as well as the estimated restoration plans. Details regarding the Company's PSPS-specific notifications, tools, messaging, and support services are included in the PSPS Execution Playbook, discussed below in Section 12.2.2.

Repair Processing and Timing: Also demonstrated in Section 11.2.1, immediately after the emergency, PacifiCorp assesses the premises of affected customers whose utility service had been disrupted or degraded, and, if applicable, the meter is removed. Every attempt is made to have service available to the customer immediately after the PSPS event or emergency is over. Additionally, the amount of time from when the service is requested to when the service is restored is tracked.

Community Resource Centers: The Company has logistical support for deployment of CRC, if necessary, during a PSPS event. Customers can access PacifiCorp representatives in person at the CRC, on the phone via the customer service phone number, and online via social media platforms.

12.2.2 Protocol for De-energization Preparedness Plan

PSPS Events

Purpose and scope of the plan: PacifiCorp's primary PSPS-specific emergency preparedness plan is called the Public Safety Power Shutoff Execution Playbook. The Playbook is intended to provide the minimum guidelines for a planned de-energization of energized facilities when extreme weather or other conditions pose an imminent safety threat to persons and/or property.

Overview of protocols, policies and procedures: PacifiCorp uses weather forecasts and other situational awareness information to identify when a potential PSPS event may be warranted. Based on the best available weather forecast and other relevant situational awareness information, senior management can initiate a PSPS event.

Operational flow of PSPS events: PacifiCorp may de-energize power lines as a preventive measure during periods of the greatest wildfire risk. The decision to implement a PSPS is based on extreme weather and area conditions, including high wind speeds, low humidity, and critically dry fuels. A PSPS event is implemented as a temporary measure and is intended to supplement, not replace, existing wildfire mitigation strategies. The general process is depicted below in Figure 12-2.

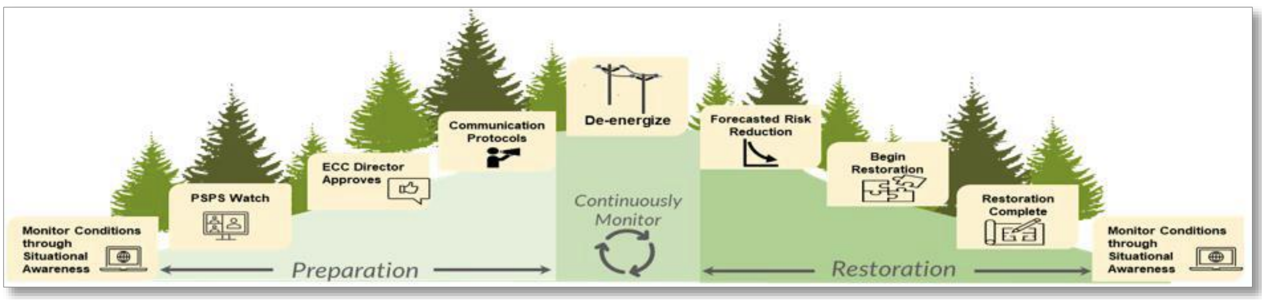


Figure 12-2: PSPS Process Flow Diagram Overview

Upon agreement by senior management to initiate PSPS actions, the Emergency Coordination Center (ECC) is activated. The ECC staff prepares a PSPS plan, which at a minimum will include:

- Forecasted date and time the de-energization event will start
- Estimated duration of the event
- Date and time affected customers will be notified under a proposed customer notification plan, including additional notifications to AFN customers
- Critical customers and facilities on the circuit such as hospitals, emergency centers, and water/water treatment plants that will be impacted

- With respect to each circuit or portion of a circuit planned for de-energization, a description of the circumstances that give rise to the need to de-energize, with specific focus on how the circumstances create an "imminent and significant risk to persons and/or property"
- A description of measures considered as an alternative to de-energization and why such measures alone are insufficient
- A description of the public safety benefits the Company hopes to achieve by de-energizing the applicable electrical facilities
- A description of proposed efforts to mitigate the adverse impacts on customers and communities impacted by de-energization
- The proposed date and time for notifying the appropriate Commission staff

Additional information may be required as part of a specific state event mitigation plan.

PacifiCorp actively monitors real-time weather conditions and tries to provide customers with additional notifications if de-energization is likely. When real-time observations and weather forecasts indicate that the three triggers for "de-energization watch" have been evaluated, and the Wildfire Risk Index is elevated, a de-energization watch protocol is initiated. The protocol includes activation of an ECC, communication with local public safety partners, and implementation of additional monitoring activities. The ECC is staffed by specialized personnel who assemble during de-energization warning and implementation to provide critical operations support through the collection and analysis of data. The ECC makes decisions to maintain the safety and reliability of the transmission and distribution system and helps facilitate cross-organization incident coordination. The ECC is led by an ECC executive and has the support of a safety officer, a joint information team (JIT), emergency management, meteorology, and operational stakeholders representing wires operations, system operations, vegetation management, engineering, and other specialties. When the ECC is activated, PacifiCorp's emergency management gathers input from public safety partners to properly characterize and consider impacts on local communities and send notifications to the operators of pre-identified critical facilities, partner utilities, and adjacent local public safety partners. The Company's

JIT then coordinates through the ECC to confirm customer lists for the area to develop a communication plan for potentially impacted customers. Local patrol and inspection of lines during a PSPS watch can include a variety of methods depending on the accessibility of locations, the reliability of the line, area conditions, and other factors. The ECC reviews these factors to determine necessary tasks such as the deployment of crews or remote monitoring by system operations.

Because of the public desire for reliable electric service, together with public safety concerns associated with de-energization, a PSPS is a measure of last resort. Consistent with existing regulations and the general mandate to operate the electrical system safely, the ECC has discretion to determine when a PSPS is appropriate. The ECC executive considers all available information, including real-time feedback and input from other ECC participants, wires operations and public safety partners to determine whether a PSPS should be executed. Additionally, the ECC executive has the discretion to determine when or if a PSPS is appropriate or refine the PSPS areas identified.

Notification and communication: Notification of and communication to customers during and after a PSPS event are detailed in Section 12.2.5.

12.2.3 Public Safety Partner Collaboration and Coordination

Tracking ID: OR-EP-06

Strong partnerships and regular collaboration between the utility and local public safety, health organizations, other utilities, and emergency management agencies are essential for effective coordination in any event that impacts the community. PacifiCorp will serve as the initiating agency in the event of a PSPS and will coordinate with all local agencies as appropriate, employing the expertise and recommendations offered by state and local emergency management agencies. Any non-outage-related issues or incidents that arise during a PSPS will be handled by local emergency management and public safety.

PacifiCorp's emergency management staff maintains regular contact with local jurisdictions. Voice and email notifications and communication occur at least once daily during a PSPS event.

If requested, a Company employee may be dispatched to the affected state or county emergency operations centers in the role of agency representative to provide a constant and direct conduit for information.

To help PacifiCorp understand local sensitivities and concerns during a PSPS, the Company will typically discuss with local emergency management agencies the critical infrastructure affected. This information adds to the situational awareness for PacifiCorp's incident command personnel before the events initiation. The PSP Portal, as described in Section 11.2.6, will be used during a PSPS to inform safety partners of critical infrastructure that may be impacted by a PSPS.

PacifiCorp will conduct outreach to adjacent utilities as appropriate based on the events or circumstances. Other utility contact information can be found within mutual assistance directories or the use of the "In Case of Crisis" application, which is an electronic directory of all Western Region Mutual Assistance Agreement member utility points of contact, internal directory as created for smaller neighboring utilities, utility commission and through ESF-12 (Energy) requests for coordination.

Effective communication is essential in any incident that impacts the public. PacifiCorp will coordinate local communication from the JIT under the ECC. Event update meetings will be held as needed with an option to join remotely. In addition, should a CRC be established, as outlined in PacifiCorp's Community Resource Center Playbook, Company representatives will be present to communicate with and assist community members. The communication plan is informed by PacifiCorp's internal PSPS Execution Playbook.

If feasible, the decision to activate a CRC should be made at the 48-hour point. If 48-hour notice is not feasible, a CRC decision should be made at least within the 24-hour point, because a minimum of a 24-hour notice is typically needed to successfully mobilize a CRC.

Drills, Simulations, and Tabletop Exercises

PacifiCorp takes a multi-step approach to coordination with its public safety partners on wildfire mitigation and PSPS preparedness. Figure 12-3 demonstrates the multi-step approach PacifiCorp takes with its public safety partners on PSPS preparedness.

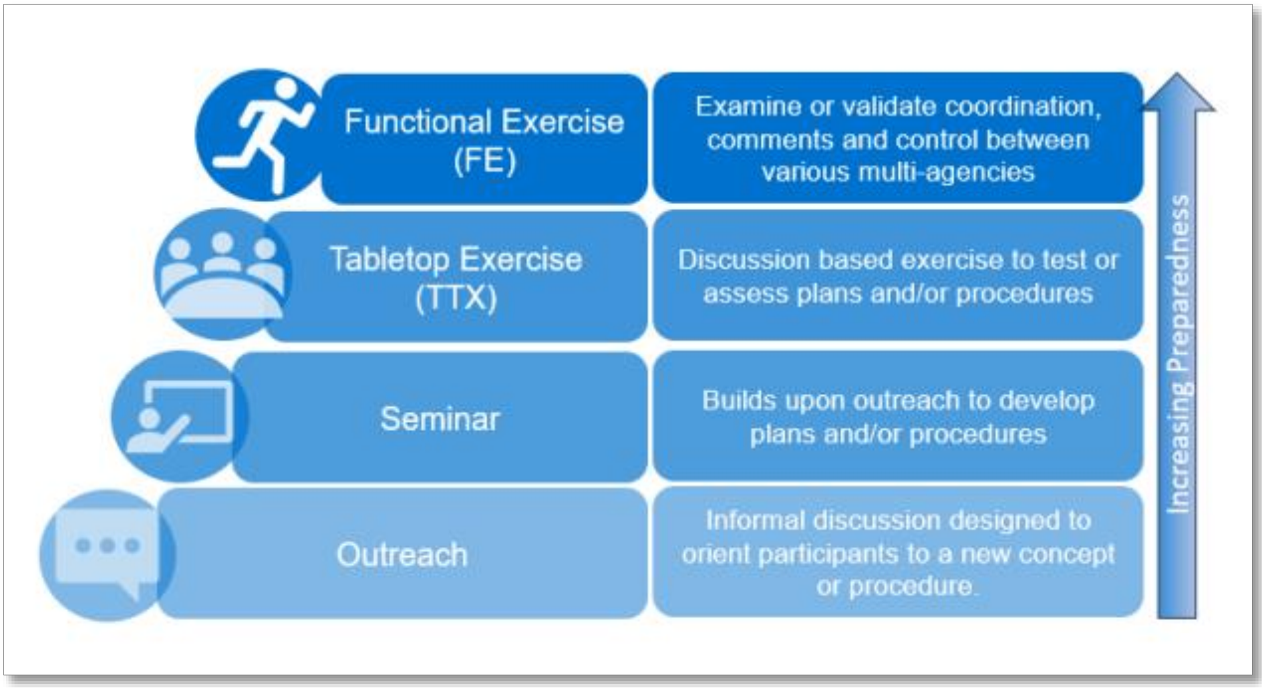


Figure 12-3: Wildfire Response and PSPS Training Preparedness Strategy

Seminars

PacifiCorp participates in multiple public safety partner meetings and workshops throughout the calendar year across its service territory. Meetings include monthly, quarterly, and annual county and state emergency management partner meetings, in addition to pre- and post-fire season collaboration meetings with local, state, and federal fire suppression agencies. These informal discussions are designed to orient participants to a new concept or procedure and continue fostering key working relationships. Additionally, the Company provides an annual customer webinar, which provides additional information about PSPS practices, displayed prominently on the wildfire safety and preparedness webpage. Workshops are local, targeted discussions that build upon outreach to further compare and refine plans, streamline processes, and confirm capabilities (such as customer outreach, critical facilities, and CRC locations and operations) with local public safety partners.

Tabletop Exercises

PacifiCorp facilitates annual discussion-based and functional tabletop exercises to develop awareness of PSPS planning and procedures. These exercises aim to facilitate public and private-sector coordination, validate communications protocols, and verify capability to support communities during extreme risk events through mitigation actions such as the deployment of CRC. Additionally, the exercises include the collective identification of critical infrastructure at the county level to better inform restoration planning and notifications. The Company collects after-action reports from exercises and real-world events involving wildfire safety and PSPS. The after-action reports request feedback on areas for improvement, potential corrective actions, and suggestions for planning or procedure development. PacifiCorp considers suggestions for inclusion in a comprehensive plan that it subsequently shares with the appropriate public safety partners.

Functional Exercises

Functional exercises are the last step in PSPS preparedness. PacifiCorp coordinates these exercises to examine or validate coordination, command, and control between various agencies. Unlike tabletop exercises or workshops, which are discussion-based, functional exercises are larger-scale and require significantly more planning and coordination and include deployment of resources to practice protocols and processes. A functional exercise tests a part of the plan to be executed. Examples relevant to a PSPS might include performing customer calls or updating websites. To be successful, functional exercises require that foundational planning such as workshops and tabletop exercises be complete and formal plans be in place.

Public Safety Partner Portal

The PSP Portal is an online resource that includes PSPS and wildfire planning and event-specific information for public safety partners. In the event of a PSPS or an emergency de-energization, event-specific information will be made available to registered portal users before, during, and after the outage to support emergency management and response efforts. The PSP Portal is described in Section 11.2.6.

12.2.4 Preparedness and Planning for Service Restoration

Tracking ID: OR-PS-02

Prior to the start of a potential PSPS event, a Company meteorologist analyzes weather and fuel variables in relation to PacifiCorp assets that could result in a PSPS. All identified circuits, or portions of circuits, are geographically shared with operations. Field resources are assigned to pre-inspect assets and vegetation and are staged in advance of the potential event to observe strategic locations within each of the impact areas. The role of the observer is to look for unsafe conditions that may trigger the need to de-energize lines for safety. Such conditions may include wind conditions causing debris or vegetation to potentially fly into lines, and/or extreme conductor movement that may lead to wires contacting each other. Each circuit, or portion of circuit, that may be impacted by a PSPS event has a pre-defined resource allocation for pre-inspection, observation, and restoration activities for overhead line sections. Resources will be assigned during an event, and a plan will be developed. During an event, PacifiCorp will develop a plan and assign resources accordingly. The plan also identifies if the line could be patrolled on the ground, identifies known areas that may not be safe for patrol in the dark, and considers areas where helicopter patrol is feasible. Based on the total resources needed to patrol all line segments impacted by a PSPS event, estimated restoration times based on switching evolution are calculated. If an event is large enough that there is a shortage of patrol resources, then restorations are prioritized by critical infrastructure affected and the number of customers impacted to prioritize restoration circuits.

The ECC executive approves restoration priorities and resource plans. Additionally, each individual authorization to patrol and authorization to re-energize is issued by the ECC executive after consulting with a Company meteorologist and field observers to confirm conditions have subsided. While all lines and facilities (e.g., substations) deenergized as part of a PSPS event are assessed, a step restoration process is leveraged where possible so that power to customers may be restored as the assessments progress instead of waiting for the assessment of the entire impacted area to complete prior to re-energization. Figure 12-4 depicts the step restoration process.

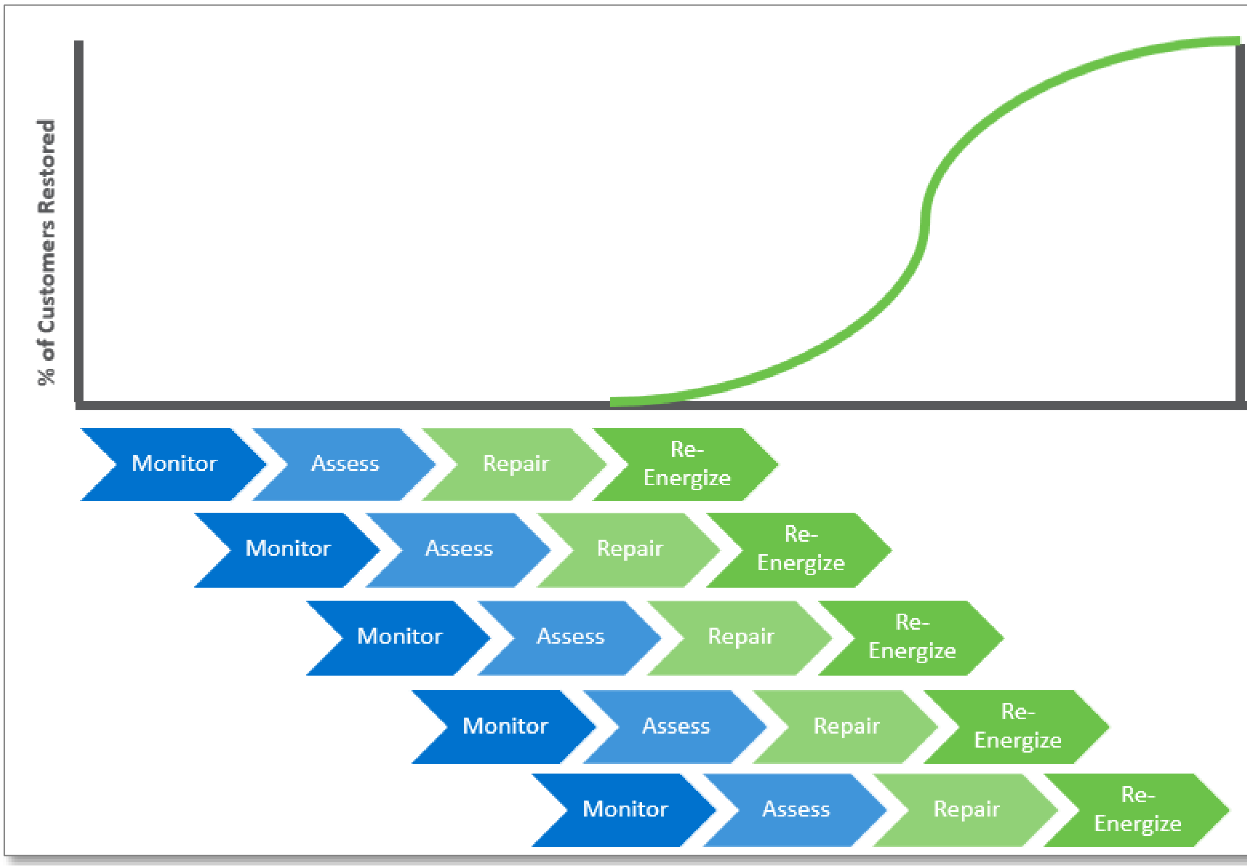


Figure 12-4: Example of the Step Restoration Process

12.2.5 PSPS Communications Strategy

During a PSPS, PacifiCorp will use all available communications methods to contact customers who may be impacted by de-energization. At each phase of the PSPS, customers will receive an email, a recorded phone call, and an SMS message with information on what the current risks are, expected impact times, what actions they can take, where to get support from CRC (when available) and where to obtain more information about the event. Customers who have self-identified as having an AFN, including customers with a medical certificate and those who have submitted an AFN Self-Certification

Form, will receive all standard notifications in addition to direct phone calls from our customer service team. These direct phone calls are to ensure that the customer has received and understands the information regarding the PSPS, including situational awareness and available resources. Customers who cannot be reached by phone may also receive a welfare check from PacifiCorp or partner organizations. During welfare checks, doorhangers with information about the PSPS are distributed to the customer or left at their door. All notifications to customers are provided in English and Spanish.

In addition to direct contact with customers, PacifiCorp will post information on its social media channels for each phase of the PSPS in English and Spanish. News releases will be sent to local and regional media as the PSPS progresses, and PacifiCorp will respond to inquiries and requests for interviews from media related to the PSPS. On the Company website, alert banners announcing the PSPS are placed on multiple pages (Home, Outage Map, Wildfire Safety, PSPS, Account Login) to alert customers about the PSPS and direct them to additional information. In addition to the PSPS webpage, an event webpage will also be set up to provide additional information and resources.

On both the PSPS webpage and the event webpage, customers can see the PSPS map, which indicates which customers or areas are in a PSPS Watch, PSPS Warning, PSPS Active, or Restored status. This map uses both colors and pop-up descriptions to indicate the phase of the PSPS a customer might be in. The map includes an address search feature to help customers locate their exact position and what phase of the PSPS they are in. Below the PSPS map is a table that will populate listing communities impacted by the PSPS and what phase of the PSPS they are currently in. The PSPS map is shown in Figure 12-6. Additional descriptive information is located below the map.

Before wildfire season starts, PacifiCorp shares PSPS information with customers in a variety of formats, including customer emails, webinars, community forums, website material, social media posts, and handouts. See Section 13 for a description of communications and outreach strategies and tactics.

For PSPS events, Figure 12-5 below shows the high-level communications process and timing.

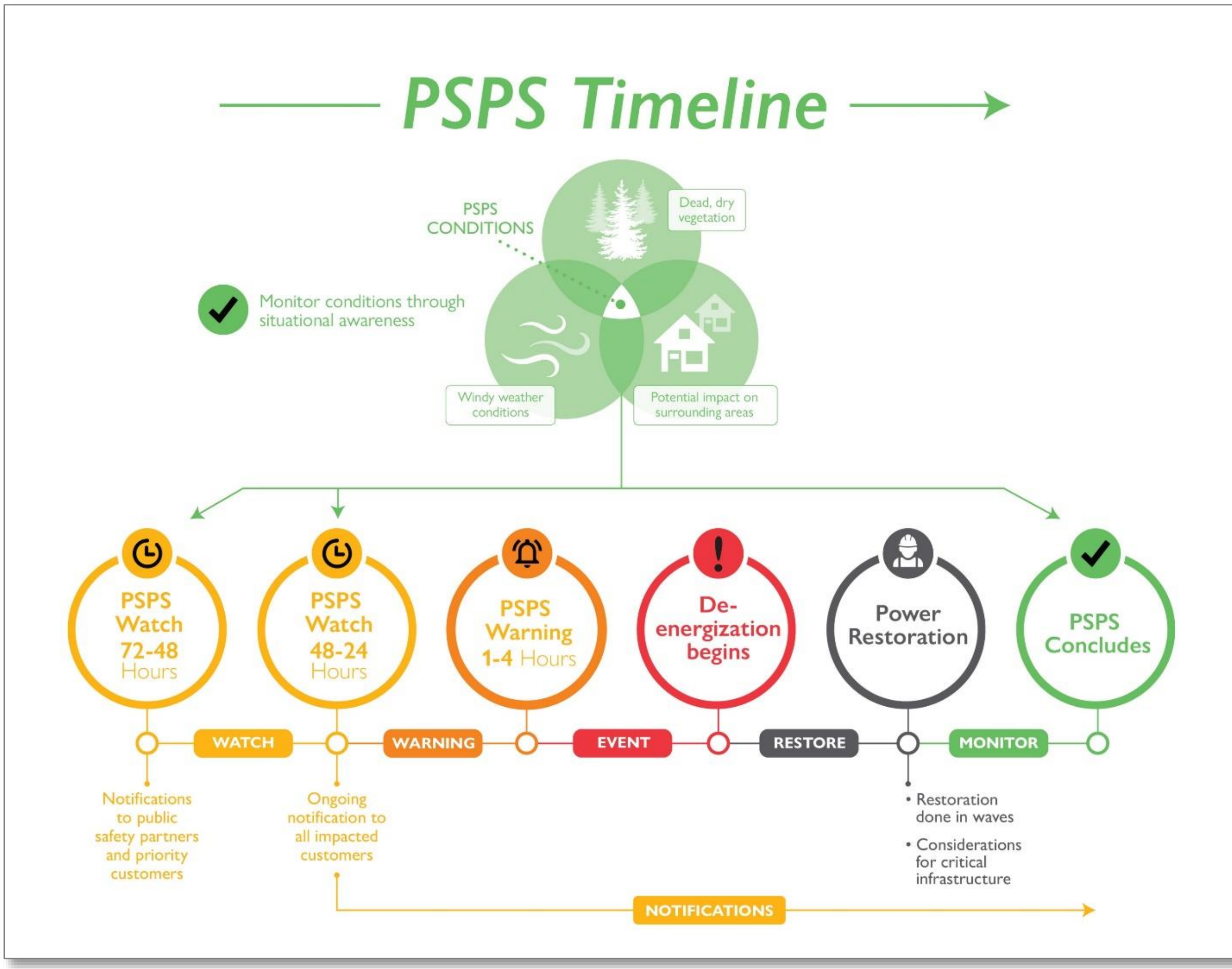


Figure 12-5: PSPS Communications Processes

When a PSPS watch is set, approximately 48-72 hours before the PSPS event, public safety partners and managed/industrial or large customers are notified. Customer outreach begins 24-48 hours before the PSPS event with customers receiving notifications from all available methods. Customers receive regular communications based on the duration of the event through notification of restoration. Table 12-1 summarizes PSPS communications to stakeholder groups.

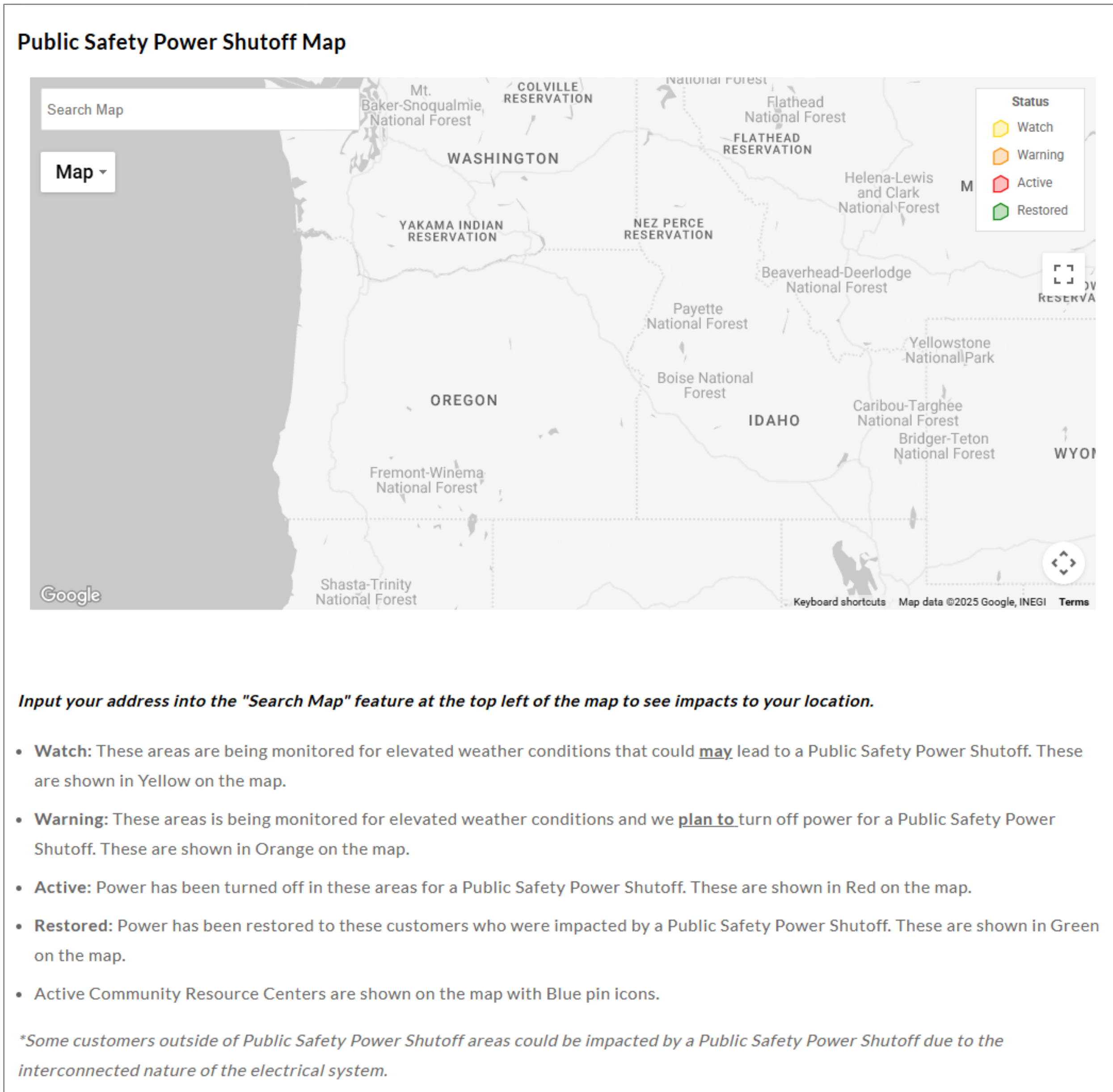
Table 12-1: Protocols for PSPS Communication to Stakeholder Groups

Stakeholder Group/Target Community	Event Type	Method(s) for Communicating	Means to Verify Message Receipt	Interests or Concerns Before, During, and After Wildfire and PSPS Events
General public	PSPS-related outage	Media release, interviews, social media, website, standard PSPS customer notifications via all available channels	Social media/media releases verified on PacifiCorp website and social media channels; Customer notifications (call, email, phone) verified/tracked through customer notification tool	• How long the event will last • Where to learn more information • Steps to take to be prepared during an outage • Resources available at CRCs
General public	Restoration of service	Media release, interviews, social media, website, standard customer notification via all available channels	Social media/media releases verified on PacifiCorp website and social media channels; Customer notifications (call, email, phone) verified/tracked through customer notification tool	• How long the event will last • Where to learn more information • How to contact PacifiCorp for restoration issues
Priority essential services	PSPS-related outage	Emergency management personnel, public safety partners, ESF-12, RBMs, PSP Portal	Customer notifications (call, email, phone) verified/tracked through customer notification too and direct outreach from emergency management or RBM	• How long the outage will last • Will generator support be provided for facilities if they do not have generators
Priority essential services	Restoration of service	Emergency management personnel, public safety partners, ESF-12, RBMs	Customer notifications (call, email, phone) verified/tracked through customer notification too and direct outreach from emergency management or RBM	• How long the outage will last • Will generator support be provided for facilities if they do not have generators
AFN populations	PSPS-related outage	Standard PSPS notification via all available channels, plus additional PSPS notifications via personal phone calls and possible in-person welfare check if unable to reach via phone	Confirm via personal phone call or welfare check	• How long the outage will last • Programs to support medical/AFN customers • How PacifiCorp will communicate with customers with medical certificate and other AFN • Resources available at CRCs
AFN populations	Restoration of service	Standard customer notification via all available channels	Confirm via personal phone call or welfare check	• Limited awareness of PacifiCorp's de-energization process, including restoration and how the Company communicates with customers with medical certificate and other AFN (including customers in the medical certificate and medical baseline programs) during each phase • How to contact PacifiCorp for restoration issues

Stakeholder Group/Target Community	Event Type	Method(s) for Communicating	Means to Verify Message Receipt	Interests or Concerns Before, During, and After Wildfire and PSPS Events
Populations with limited English proficiency	Wildfire, wildfire related outage, PSPS-related de-energization, restoration of service	Media release, interviews, social media, website translated content in key languages: English, Spanish, standard customer notification via all available channels	Social media/media releases verified on PacifiCorp website and social media channels; Customer notifications (call, email, phone) verified/tracked through customer notification tool	• Limited awareness of PacifiCorp's de-energization process, including restoration and how the Company communicates with customers and communities during each phase • Resources available to support customers, such as CRCs during a PSPS • How to contact PacifiCorp for restoration issues
Tribes	Wildfire, wildfire related outage, PSPS-related de-energization, restoration of service	Emergency management personnel, public safety partners, ESF-12, RBMs, media release, interviews, social media, website; standard customer notification via all available channels	Customer notifications (call, email, phone) verified/tracked through customer notification too and direct outreach from emergency management or RBM	• Limited awareness of PacifiCorp's de-energization process, including restoration and how the Company communicates with customers and communities during each phase • Resources available to support customers such as CRCs during a PSPS • How to contact PacifiCorp for restoration issues

PacifiCorp customer service attempts to make personal phone calls to customers who have self-identified as having a medical certificate or other AFN. Contact occurs, when possible, prior to an event, at the beginning of re-energization, and after energization is completed. Customer service tracks if a positive confirmation of contact was made with medical and other AFN customers. The results of the contacts are reported to the ECC executive. Unmet AFN needs may be escalated through the ECC. The AFN coordinator works with the ECC liaison to quickly relay the information to local public safety partners. Such coordination may lead to a welfare check.

Customers can also see on PacifiCorp's outage map, or PSPS map, that the outage is due to a PSPS. An example of the PSPS map is presented in Figure 12-6 below.



Input your address into the "Search Map" feature at the top left of the map to see impacts to your location.

- **Watch:** These areas are being monitored for elevated weather conditions that could **may** lead to a Public Safety Power Shutoff. These are shown in Yellow on the map.
- **Warning:** These areas is being monitored for elevated weather conditions and we **plan to** turn off power for a Public Safety Power Shutoff. These are shown in Orange on the map.
- **Active:** Power has been turned off in these areas for a Public Safety Power Shutoff. These are shown in Red on the map.
- **Restored:** Power has been restored to these customers who were impacted by a Public Safety Power Shutoff. These are shown in Green on the map.
- Active Community Resource Centers are shown on the map with Blue pin icons.

**Some customers outside of Public Safety Power Shutoff areas could be impacted by a Public Safety Power Shutoff due to the interconnected nature of the electrical system.*

Figure 12-6: Example of PSPS Map

12.2.6 Battery Programs

Tracking ID: OR-PS-01

In 2024, PacifiCorp introduced a new program to mitigate outage impacts to customers who rely on medical equipment powered by electricity. Customers enrolled in PacifiCorp's Medical Certificate and Low-Income Discount Program, as well as licensed residential care homes, facilities, adult foster homes, or hospice facilities, are eligible for a rebate on the purchase of a portable power station, battery, or permanent backup generator to support readiness and resiliency for medical customers.

A summary of Oregon's Medical Backup Electric Power Rebate Program is shown in Table 12-2 below.

Table 12-2: Oregon Medical Backup Electric Power Rebate Program

Year	Active Residential Customers	Customers Eligible*	Number of Rebates	% of Rebates Per Eligible Customers
2024	529,171	3,489	86	2.5%
2025 (Through Q3)	533,491	2,370	151	6.4%

* These values do not include eligible facilities and are represented only by those living in households.

To evaluate the effectiveness of the battery rebate program, PacifiCorp considers the following categories of metrics:

- **Intake evaluation:** A methodology for comparing a broad list of programs that reduce the customer impact of wildfire mitigations; programs could include customer surveys, rebate programs, and customer outreach. This evaluation will include numbers of customers, types of impact, and customer risk categories. This methodology is under development.
- **Effectiveness:** How the rebate program is potentially reducing the customer impact of wildfire mitigation de-energization-related programs. Backup power, when used by customers with a medical certificate, can support medical equipment power needs during power outages such as those experienced during ESS and encroachment de-energizations.
- **Participation:** The Medical Backup Electric Power Rebate Program has averaged approximately 4% of eligible participants since its inception in 2024. Possible reasons why a customer might not participate in the backup power program include (1) they already have backup power, (2) they do not have the means to maintain backup power, (3) their emergency plans do not require backup power, (4) they do not have the financial means to purchase the backup power, or (5) they acquire backup power by another means.

Customer Awareness

As part of its Wildfire Communications Customer Survey as described in Section 13.2.5, PacifiCorp queries feedback from customers about the Medical Backup Electric Power Rebate Program and how to better inform eligible customers about the program. The Company measures these results to inform future outreach and engagement opportunities for increasing customer awareness. The Company promotes a variety of programs to its customers including the Medical Backup Electric Power Rebate Program throughout the year.

The results of the Wildfire Communications Customer Survey are indicated in Appendix F.

12.2.7 Community Resource Centers

PacifiCorp is aware of the potential impacts of PSPS events to all customers, businesses, and communities and can provide community support through CRCs. By taking advantage of established relationships with community and public safety partners, the Company may activate a CRC in an impacted area to give community members and businesses access to items that might be affected by the interruption of electrical service. Services vary across CRCs and include:

- Potable water
- Universally accessible shelter from hazardous environment
- Air conditioning
- Seating and tables
- Restroom facilities
- Refrigeration for medicine and baby needs
- Interior and area lighting
- On-site security
- Communications including internet, Wi-Fi, cellular access, and satellite phone
- Television and radio
- On-site medical support (where available)

- Charging stations for medical devices, cellular devices, radios, and computers

CRCs adhere to all existing local, county, state or federal public health orders and will have personal protective equipment on site and available to customers if needed. Local emergency management and community-based organizations will be notified of CRCs as appropriate and with advance notice, three days prior to the event, when possible. CRC activation timing, protocols, and locations are discussed with area emergency management and community-based organizations during emergency management workshops and tabletop exercises, as described in Section 12.2.3.

12.2.8 PSPS and Emergency Preparedness – Performance Monitoring

PacifiCorp has not initiated a PSPS event in the state of Oregon since 2022. Consistent with OAR 860-300-0060, PacifiCorp files an annual report on PSPS events that occurred during the fire season, including lessons learned. A copy of the report is available online.

PacifiCorp monitors both quantitative and qualitative elements of all PSPS events to support improvements in processes, with a focus on improving customer support and / or reducing customer impacts. A summary of measurements and these supported objectives are outlined below:

- Forecasted weather conditions are compared to actual weather conditions and documented field observations. This comparison supports model accuracy, refinement of weather station locations or weather station percentiles for wind gusts.
- Forecasted de-energization and re-energization timing compared to actual time. These aspects help inform operational processes and refine processes used to ensure both de-energization and re-energization meet the appropriate balance of safety considerations and customer impact balance, along with evaluating the accuracy of model timing and customer and stakeholder communications.
- Critical customers and facilities on affected circuits such as hospitals, emergency centers, and water/water treatment plants that were impacted. If PacifiCorp was unable to mitigate de-energization of a critical facility with protective devices and sectionalization, an informal post-

event review to evaluate options with customer and company representatives may be initiated on a case-by-case basis.

- Number of Access Functional Needs (AFN) customers, outcome of AFN outreach, AFN customer feedback and / or requested needs to evaluate improvement on AFN support and programs.
- Results of customer notifications to evaluate communication reach and successful delivery by mechanism, which can inform improvements in future communication planning.
- Location and attendance at established Customer Resource Centers (CRCs), resources utilized at CRCs and any feedback or escalations received by staff at CRC in order to evaluate services provided, location of services in the community and improvements in what is communicated to the Company's customers and stakeholders.
- Feedback from public safety partners and community leaders to inform improvement in stakeholder coordination and messaging.
- Duration to restore circuits or circuit segments, type of patrol (aerial / ground) and damage found and repaired during restoration. These details allow an understanding of potential ignition points when damage is found during restoration, as well as evaluate ways to improve pre-event and patrol response.
- Accuracy of communicated Estimated Restoration Times (ETRs) to understand better pre-event and in-event operational processes that allows accurate and timely information to stakeholders and customers.

12.2.9 PSPS and Emergency Preparedness – Other

No additional information identified.

12.3 Results

PSPS Events

PacifiCorp did not initiate any PSPS events in Oregon in 2025.

Medical Backup Electric Power Rebate Program

As described in the 2025 WMP Update,[13] PacifiCorp targeted 3% participation of eligible customers in the Medical Backup Electric Power Rebate Program. As of the third quarter of 2025, 6.4% of eligible customers were participating in the program.

12.4 Initiatives and Targets

12.4.1 Initiative Summary Table

In Table OPUC 12-1, PacifiCorp presents its 2026–2028 public safety power shutoff (PSPS) initiatives and targets, which are described below.

[13] PacifiCorp. 2025 Wildfire Mitigation Plan Update. Page 107.

Table OPUC 12-1: Public Safety Power Shutoff Initiative Cost Summary in Thousands

Initiative Activity	Tracking ID	Target Unit	2026 Target	2026 Forecast ($1,000)	2027 Target	2027 Forecast ($1,000)	2028 Target	2028 Forecast ($1,000)	Three-Year Total ($1,000)	Section
Portable Battery program	OR-PS-01	Qualitative	Measurement of customer awareness of the Portable Battery Rebate Program through the customer survey	[redacted]	Measurement of customer awareness of the Portable Battery Rebate Program through the customer survey	[redacted]	Measurement of customer awareness of the Portable Battery Rebate Program through the customer survey	[redacted]	[redacted]	12.2.6, 12.4.1
Preparedness and planning for service restoration: Helicopter Standby	OR-PS-02	N/A	N/A	[redacted]	N/A	[redacted]	N/A	[redacted]	[redacted]	11.2.4, 12.2.4, 12.4

In the 2026–2028 WMP cycle, PacifiCorp will monitor awareness of the Medical Backup Electric Power Rebate program with customers through the customer survey that is administered twice a year and discussed further in Section 13.2.5 and Appendix F. Understanding customer awareness of the program will inform potential changes to program outreach efforts.

As described in Section 12.2.4, PacifiCorp may use a helicopter to support service restoration during a PSPS. Emergency restoration patrols are also conducted on transmission and distribution lines when an outage occurs due to emergency de-energization, or ESS. The Company maintains a contract to keep a helicopter on standby for emergency restoration patrols. When a helicopter is used, for example for PSPS, emergency de-energization, or ESS patrols, its usage is attributed to the work orders created for that specific event.

12.5 Continuous Improvement

PacifiCorp had a PSPS event in Central and Southern Utah in June 2025. Prior to the 2025 season, PacifiCorp had implemented a customer communications improvement initiative for PSPS events to improve the time from initiation to completing customer communications during a PSPS event. During the Utah PSPS event, the Company encountered challenges using the pre-established templates that were created to streamline communications.

The Utah PSPS impacted multiple districts and various types of terrain. During the activation the Company had the opportunity to sectionalize and be very surgical about when and where customer impacts would occur. The templates established were designed expecting larger blocks of customers that would be given a single status (i.e., warning or watch) at the same time. Ultimately, the templates were not as nimble as the more granular level with which the Company was able to manage circuit segmentation and timing.

After this activation, PacifiCorp developed the following PSPS notifications and best practices. The goal was to ensure there were correct templates for a variety of scenarios that provided clarity to customers regarding what to expect:

- The Company originally had seven templates (watch, warning, imminent, begin, restore/patrol, end, cancel); there are now 18 templates.
- The new templates include all the required templates, which include the original seven, plus optional "flex" templates.
- If de-energization were to occur for a PSPS early in the morning, it was found that a reminder the evening before (about 12 hours prior) was useful to customers.
- The new templates explain the difference between watch and warning, while also explaining that not everyone may be experiencing the same impacts at the same time.
- The variety of new templates helps to ensure the timely delivery of messages to customers with information specific to their impacts utilizing the system improvements put in place in 2024.

- Customers will receive only notifications applicable to their PSPS status and the expected timing.
- Improvements targeted for 2026 include improving timelines by implementing tools successful in 2025 to automate customer notifications via Foundry for other event types.

These templates have been fully built and tested within PacifiCorp's systems and teams, and they will be further exercised before the 2026 wildfire season.

13. Community Outreach and Education Awareness

13.1 Overview

PacifiCorp employs a multifaceted approach to support community outreach and engagement with the goal of providing clear, actionable, and timely information to customers, community stakeholders, and regulators. Over the past several years, the Company has engaged customers and the general public throughout its service territory on wildfire safety and preparedness through a variety of tactics, including webinars, in-person forums and booth events, targeted paid advertising campaigns, informational videos featuring Company subject matter experts, press engagement, distributed print materials, infographics, social media updates, and direct communication through bill messages, emails, and website content, among other communication channels. The wildfire safety and preparedness community engagement plan will continue to evolve year-over-year as customer and stakeholder feedback and regulatory guidance are incorporated. PacifiCorp maintains an awareness and engagement strategy that is flexible and allows for dynamic tactics, informed by customer survey data, community stakeholder input, and community needs. Overall, PacifiCorp's plan includes information that can be heard, watched, and read in a variety of ways with the goal of accessibility and understandability.

Awareness Campaign

For the past several years, the Company has deployed some form of paid media campaign to raise awareness and action on wildfire safety and preparedness. The wildfire safety and awareness paid advertising campaign runs March through September each year and includes radio spots, digital over-the-top video ads on platforms such as streaming services, display ads (search and web banners), and social media static and video ads (such as YouTube—delivered in English and Spanish). The campaign focuses on key topics for customers on wildfire safety and prevention, including operational practices such as ESS, emergency de-energization, PSPS, system strengthening and resilience, and wildfire preparedness.

The call-to-action in the paid media campaign compels the audience to visit PacifiCorp's wildfire safety and preparedness online resources. Engaging with local and regional news media outlets is another key component of the awareness and engagement campaign. Each year prior to fire season, PacifiCorp distributes updated wildfire safety information and information on the Company's WMP to press outlets across its service area. Throughout wildfire season, PacifiCorp responds to media inquiries about its wildfire safety and prevention efforts with local, state, and national media. In addition to paid and earned (news media engagement) awareness and engagement strategies, PacifiCorp also communicates to customers about wildfire safety and preparedness through channels it owns or manages, as shown in Figure 13-1. Bill messages, website and social media updates, emails, texts, and automated phone calls are additional ways the Company reaches customers.

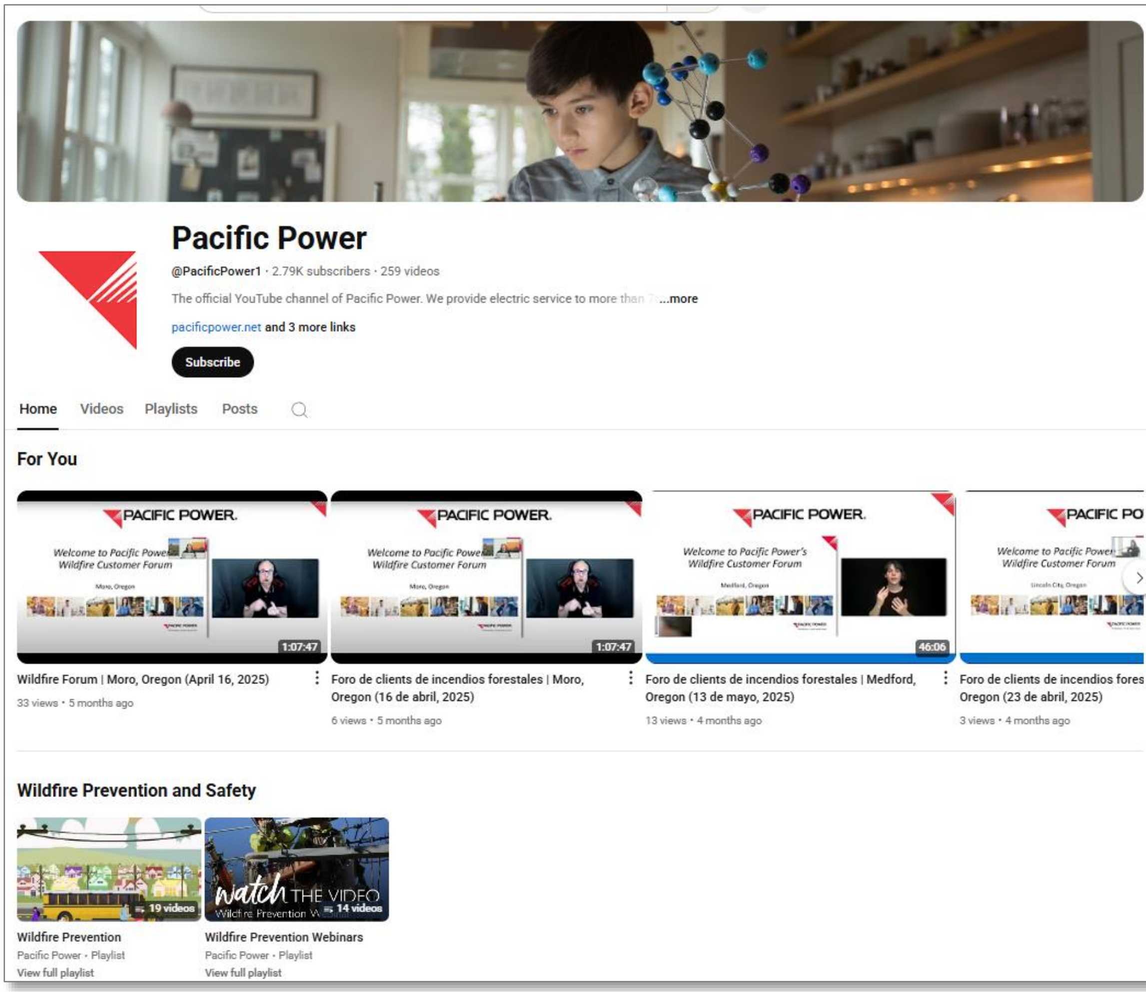


Figure 13-1: PacifiCorp on Social Media

Support Collateral

PacifiCorp has developed several print and digital wildfire safety and preparedness collateral pieces, including factsheets, flyers, brochures, infographics, and safety checklists. These items are accessible through the Company wildfire safety webpages and are used at public meetings and community events to describe PSPS (its necessity, what to expect throughout the event, etc.) and to provide general information on emergency kits/plans and preparation checklists, among other topics. The PacifiCorp communications team updates these materials annually to ensure the information is relevant, accessible, and actionable. Spanish versions of each piece of collateral are also made available. Some examples of support collateral are shown in Figure 13-2 and Figure 13-3.

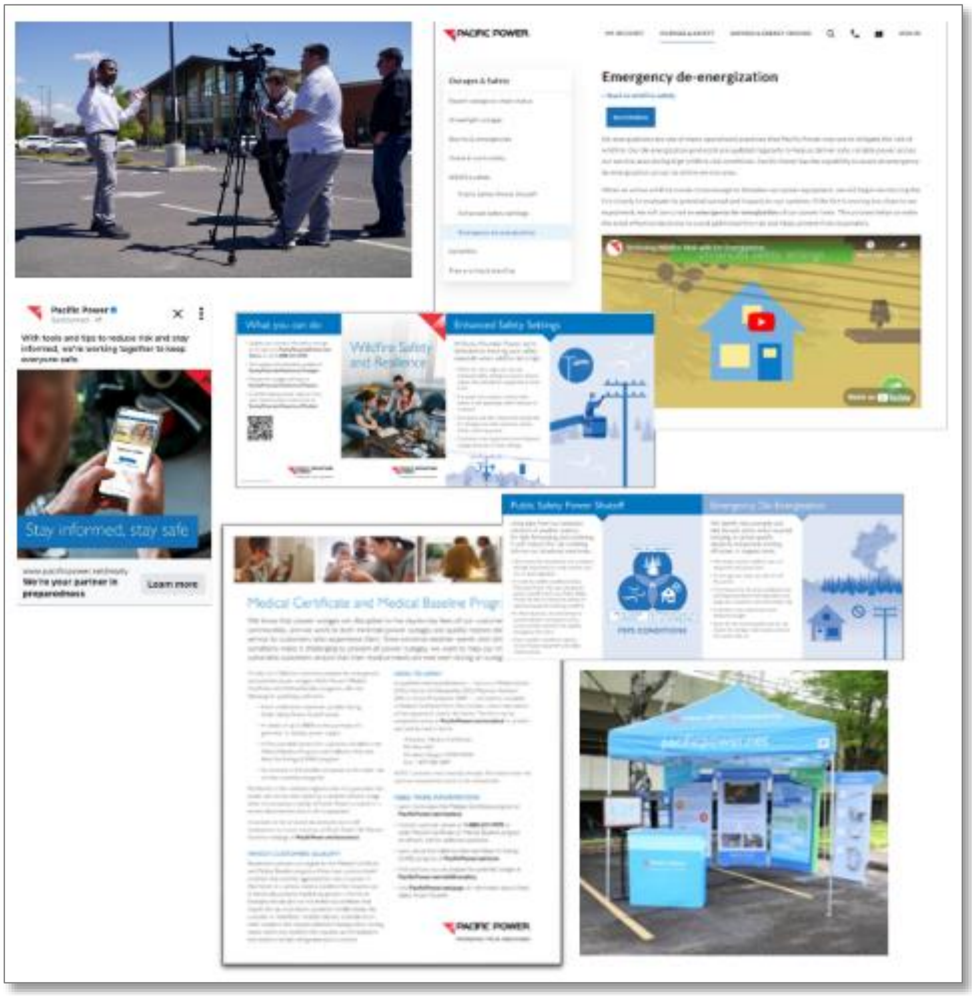


Figure 13-2: Example of Support Collateral

Additionally, the Company engages customers as needed via direct communications such as email, phone calls, and text messages, based on the customer's communications preferences. For instance, beginning in 2023, during periods of elevated risk, ESS, as described in Section 6, may be implemented in some areas. Consistent with OAR 860-300-0020(1)(e), customers who will be impacted by an ESS are sent a notification via email or paper letter, depending on their communication preferences. Figure 13-3 is an example of support collateral for customer notification of implementation of modified operational settings.

PACIFIC POWER.

Wildfire safety precautions in place for your area

Due to elevated wildfire risk in your area, we are taking additional safety precautions. We have turned on enhanced safety settings and protective devices on our equipment that will **automatically de-energize power lines** when debris, wildlife or strong winds contact the lines.

- **Unfortunately, we cannot provide advanced notice of these outages.** Power will remain on under normal conditions, but it will shut off automatically if something contacts the line for the safety of customers and communities.
- Customers should expect more frequent and longer duration outages when these settings are in place.

These measures help prevent wildfires from starting, and we appreciate your patience. We understand that power outages impact our customers.

Be prepared and stay informed

- Plan ahead and be prepared year-round.
- Create a plan with your medical provider for appropriate backup power.
- Review your contact information and sign up for alerts.
- Find outage and restoration information on our outage map.
- Sign up for outage alerts by texting **OUT to 722797.**

Visit our website for preparedness and wildfire safety information.

Figure 13-3: Example of Support Collateral for Customer Notification

Customer Service Training

Customer care agents have received training in wildfire safety and preparedness information to ensure customers who are seeking information about wildfire safety and preparedness get the information they need. Additionally, customers with specific language needs can also contact the Company's customer care number and request to speak with an agent in their preferred language. PacifiCorp employs Spanish-speaking customer care professionals and contracts with a 24/7 service that provides interpretation in real time over the phone in multiple languages and dialects. In 2022, PacifiCorp established a process to track customer calls regarding wildfire safety, wildfire preparedness, and other wildfire concerns.

Website

The Company website provides robust and comprehensive information on Company wildfire mitigation programs, general wildfire safety, PSPS information, and more. In 2022, the Company launched updated wildfire safety webpages to improve the customer experience and allow for improved accessibility to wildfire-related information. Additionally, pages were updated with embedded videos highlighting the work PacifiCorp will complete to strengthen the system, increase situational awareness, and prepare for events that may result in outage activity. The wildfire safety webpages are updated annually and as needed during wildfire season and include 1-to-1 translated Spanish wildfire safety pages, as shown in Figure 13-4. The Company website includes frequently asked questions (FAQs) sections, links to PSPS maps and information, resources on operational practices, and links to download wildfire handouts.

Figure 13-4: Wildfire Safety Webpage Translated in Spanish

Various resources and tools for community preparedness can be found on the PacifiCorp wildfire mitigation webpage. Prompts for customers to update contact information are displayed prominently. Guides and checklists for creating an emergency plan/outage kit are easily accessible in the Resources and Brochures dropdown. The wildfire safety webpages also include videos describing key components of the WMP. Overall, site visitors have a variety of ways to consume and engage with wildfire safety and preparedness information, as shown below in Figure 13-5.

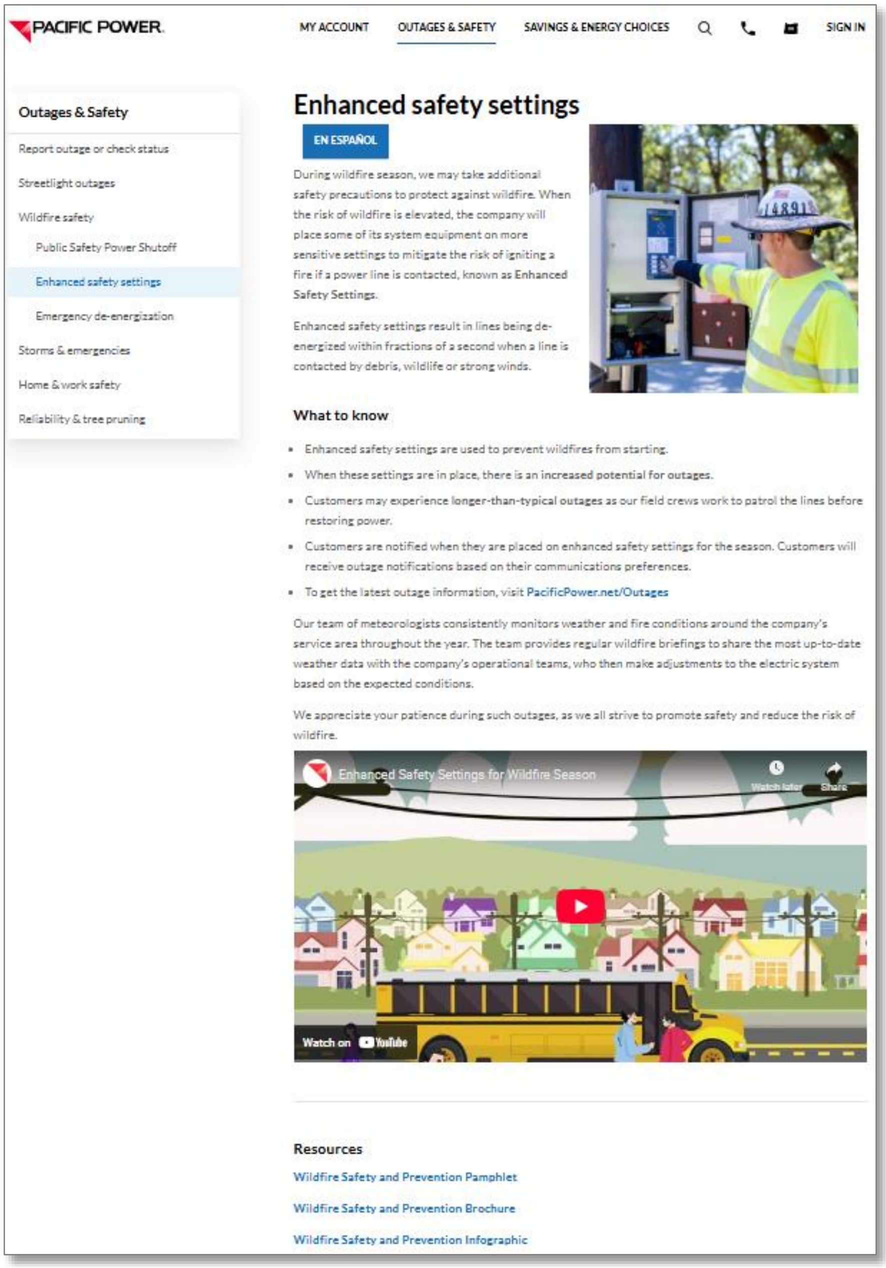


Figure 13-5: Example of Site Navigation

Additionally, the PacifiCorp Public Safety Power Shutoff webpage provides educational material on PSPS. It describes why a PSPS might happen, including details of conditions monitored prior to executing a PSPS and how customers can prepare. The webpage gives information on how customers will be notified, what to expect during an event, and the service restoration process. There is also an interactive map of PSPS areas (shown in Figure 12-6) that provides a visualization of where the Company is considering a PSPS.

13.2 Strategy

13.2.1 Best Practice Sharing with Other Utilities

Tracking ID: OR-CO-04

PacifiCorp has hosted a series of events known as the Western Utilities Wildfire Communications Workshop to meet with communications teams from Western utilities in the United States and Canada to discuss wildfire communications. The first event was hosted by PacifiCorp in November 2024 and included discussions on internal communications, digital media, paid media, media relations, community engagement, lessons learned from the 2024 wildfire season, and a look ahead to 2025 challenges. A second event was held March 2025 to prepare for the upcoming wildfire season, and a third event was held in November 2025 to discuss learnings from the most recent wildfire season.

13.2.2 Collaboration on Local Wildfire Mitigation Planning

Tracking ID: OR-CO-12

In 2022, PacifiCorp enhanced its emergency preparedness plan in collaboration with key internal business units and external public safety partners. PacifiCorp meets at least annually with county and local emergency management agencies, public health authorities, local law enforcement, and fire jurisdictions and other interested parties. Through these meetings, PacifiCorp gathers input from the community and adjusts plans as needed. PacifiCorp also participates in regulatory proceedings, town hall meetings, and open-house events to engage other industry leaders and community leaders and members. These events focus on a range of aspects of PacifiCorp's wildfire emergency planning and preparedness programs, including communication protocols, notification protocols, and resource coordination efforts. Please see Sections 11.2.3 and 12.2.3 for more information.

13.2.3 Engagement with Access and Functional Needs Populations or Environmental Justice Communities

Pre-fire season, PacifiCorp enhances its outreach through multiple communication channels and partners with public safety partners, community-based organizations (CBOs), and other AFN service providers to amplify messaging. These include targeted emails, social media posts, wildfire safety webinars, in-person workshops, and the distribution of digital brochures and handouts in multiple languages, including English and Spanish, as discussed in Section 13.1. These materials cover a range of topics, including wildfire preparation, the Low-Income Discount Program, the Medical Certificate Program, and the Medical Backup Electric Power Rebate Program.

The Company's customer care agents are also trained to provide PSPS-related information and facilitate conversations with translation services to ensure language barriers do not hinder critical communication.

Accessibility programs webpage: This one-stop-shop webpage offers customers a simplified and central location to learn about PacifiCorp's programs to boost preparedness and resilience, with a focus on customers with AFN. Customers can access information on how to stay informed during an outage, the Access and Functional Needs Self-Certification Form, programs for medical customers, backup power options, financial assistance programs, communications support, PSPS information, and printable collateral.

AFN self-certification webform: Customers with a disability or who use a device for health, safety, or independence that requires electricity can self-identify as having an AFN via this new webform. Customers who complete the form will receive additional notifications before, during, and after a PSPS, when possible.

Accessibility program flyer: This simplified flyer highlights programs for customers to get health and medical support, backup power options, financial assistance, language support, and information about PSPS.

Toolkit for master meter customers and tenants: Master meter customers, property managers, and landlords are emailed information about PSPS preparedness and resources for tenants. Included in the email is a flyer to post in common areas to help raise awareness and boost resilience among tenants.

Accessibility programs toolkit for partners: Designed for public safety partners, CBOs, and other external partners that work directly with AFN communities, this toolkit includes resources for external partners to share with their clients and communities. The Accessibility Programs Toolkit is designed for partners to post on their organization's websites and social media, distribute at preparedness events, and share with clients and the broader community. PacifiCorp will continue to leverage emergency managers and regional business managers to annually distribute the AFN toolkit to vulnerable communities. This outreach is consistent with OPUC directives to provide additional information to vulnerable frontline communities beyond those in our system.

Engagement with Environmental Justice and Frontline Communities

PacifiCorp has an established comprehensive, equity-focused engagement framework to ensure environmental justice and frontline communities, as defined by House Bill (HB) 4077 (2022), are meaningfully informed and involved in planning activities. The PacifiCorp advisory group engagement framework centers on multiple advisory groups that elevate the lived experiences, cultural perspectives, and resilience needs of the communities most impacted by energy infrastructure and climate-related risks.

Oregon Community Engagement

PacifiCorp created two Oregon advisory groups to ensure inclusive participation in utility planning and mitigation strategies:

Community Benefits and Impacts Advisory Group

- Represents 11 organizations and individuals from environmental justice and frontline communities, including communities of color, low-income households, rural and coastal populations, youth, seniors, and people with disabilities.
- Provides direct input to identify community needs, barriers to participation, and culturally responsive engagement strategies.
- Supports information exchange, outreach efforts, and collaborative development of tools and solutions.
- Held engagements on wildfire mitigation topics in April 2024 and June 2025.

Tribal Nations Community Benefits and Impacts Advisory Group

- Formed through recommendations from Oregon Tribal members and representatives from Tribal enterprises.
- Focuses on sovereignty, historical and cultural interests, and project planning that respects Tribal priorities.
- Supported by PacifiCorp's Tribal liaison representative and regional business managers to strengthen relationships and build trust.
- Held engagements on wildfire forums and preparedness in May 2024 and June 2025.

Both groups play an expanding role in discussions related to energy resilience—ensuring frontline communities have reliable, sustainable energy during disruptions such as wildfires and extreme weather. The advisory groups intend to continue a joint annual planning meeting where wildfire mitigation and prevention will be discussed.

13.2.4 WMP Engagement, Outreach, and Education Awareness Program

Tracking ID: OR-CO-11

Webinars and Community Forums

PacifiCorp hosts an annual webinar that provides an overview of the Company's wildfire mitigation program and strategies. Among other items, key mitigation topics addressed in the webinar include situational awareness capabilities, system hardening investments, the PSPS process, and general emergency preparedness. The webinar focuses on how the Company engages with local communities and public safety partners on wildfire safety. It also serves as a forum for customers, community stakeholders, and the public at large to ask questions during the live stream.

Public forums included presentations from Company representatives on strategic wildfire mitigation programs, system strengthening and improvements, PSPS protocols, and customer engagement and preparedness. For those unable to attend in person, forums were streamed live. All included Spanish and American Sign Language (ASL) interpretation. The community forums were promoted through local news coverage and posted on the Company website and social media channels with links for registration and live stream access. Local elected officials, emergency managers, and other stakeholders were invited via email and encouraged to help promote the events.

During these forums, communities were informed on key elements of the PacifiCorp WMP. In-person and online (via a chat function) question-and-answer sessions were conducted to allow for community member engagement. The forums allowed for a two-way dialogue and created space for feedback to be collected and applied in context to key elements of the plan. Informational brochures were also made available to the community. PacifiCorp's 2025 forums had a total of 398 attendees. To improve engagement and attendance, successful experiences from other Company events were implemented in 2023, to include meals at events and timings when people could attend after a typical workday. PacifiCorp had customer service agents at each event to help customers review account information and verify their contact information. The venues and communities selected for these forums are reviewed and rotated year to year. Additionally, public safety partners were engaged in the process to support attendance and promotion within their communities.

13.2.5 Community Outreach and Engagement – Performance Monitoring

Tracking ID: OR-CO-05

PacifiCorp conducts customer surveys before and after the wildfire season. The objective of the surveys is to measure the public's awareness of messaging related to wildfire preparedness and safety to inform development of the next year's engagement campaign. PacifiCorp intends to continue to conduct these surveys to inform the Company's outreach approach.

Table 13-1, as shown below, lists PacifiCorp outreach and engagement activities.

Table 13-1: Community Outreach and Engagement Activities

Tactic	Metric(s)	Demonstrates
Social media	• Post engagement (likes, comments, shares) • Impressions • Video views	People understand the content being posted and are visiting the Company website for more information
Paid media	• Impressions • Video completion rate • Click-through rate	People are receiving key messages and visiting the Company website for more information
Community events	• Number of events • Number of registrants • Number of attendees • Video views (for recording)	Communities where events are taking place, how many people attend and how many people are watching after the fact
Webinars	• Number of registrants • Number of attendees • Video views (for recording)	Locations where people are watching from, how many people attend and how many people are watching after the fact
Customer notifications	• Email open rate • Number of calls made • Number of texts sent	Customers who see the message in their preferred method of contact
Website	• Page views • Unique visitors	Customers who visit the Company website to learn more about wildfire prevention and safety efforts
Mailed Letters	• Number of letters sent	Number of customers who were notified by their preferred method of contact for ESS information
Earned Media	• Number of mentions in news articles/broadcasts • Number of stories pitched to media • Number of media inquiries	Wildfire safety information being shared with audiences beyond customers

13.2.6 Community Outreach and Engagement – Other

Engagement with Tribal Nations

While PacifiCorp is a service provider for several Oregon Tribes and their enterprises, the Company strives to build collaborative relationships with all nine Tribes in Oregon and understands the Tribes are sovereign nations, with their own strategic initiatives.

In 2023, PacifiCorp established a Tribal liaison representative position to support collaboration and consultation with Tribal nations on current priorities and issues of mutual interest, including wildfire and PSPS preparedness.

The Company works with Tribal staff to identify local households where residents have medical and other needs that require functioning power. Collaborating with Tribes helps the Company better support customers and residents with special needs during outages and provides them with resource information for home assistance programs.

Tribes have expressed concern that some ancestral homelands and culturally significant sites are susceptible to heightened wildfire risk and need to be closely monitored. Additionally, Tribal members who live in remote communities or areas with limited infrastructure may not have full access to information on wildfires, emergency de-energizations, or PSPS events.

The Tribal liaison representative works internally with regional business managers, emergency management, communications, and other PacifiCorp staff to develop a network of support and collaboration that includes contacts for the Tribes as well as the Company. Tribal needs and concerns will be comprehensively addressed during all activations and events through these identified contacts and coordinated outreach to Tribes. Table 13-2 below summarizes PacifiCorp's collaboration with Tribal nations.

Table 13-2: Collaboration with Tribal Nations

Name of County, City, or Tribal Agency or Civil Society Organization (e.g., nongovernmental organization, fire safe council)	Program, Plan, or Document	Last Version of Collaboration	Level of Collaboration
Burns Paiute	The Tribal chair has expressed interest in receiving information about wildfire mitigation and prevention	Summer 2025	Simple networking at events and meetings
Confederated Tribes of Grand Ronde	Wildfire preparedness, customer programs	Spring 2025	Community meetings, social media, advisory boards
Confederated Tribes of Warm Springs	Wildfire preparedness, customer programs	Spring 2025	Community meetings, social media, advisory boards
Coos, Lower Umpqua & Siuslaw Tribes	Wildfire preparedness, customer programs	Spring 2025	Community meetings, social media, advisory boards
Coquille Tribe	Wildfire preparedness, customer programs	Spring 2025	Community meetings, social media, advisory boards
Cow Creek Band of Umpqua	Wildfire preparedness, customer programs	Spring 2025	Community meetings, social media, advisory boards
Klamath Tribes	Wildfire preparedness, customer programs	Spring 2025	Community meetings, social media, advisory boards
Confederated Tribes of Siletz Indians	Wildfire preparedness, customer programs	Spring 2025	Community meetings, social media, advisory boards
Umatilla Tribe	Wildfire preparedness, customer programs	Spring 2025	Community meetings, social media, advisory boards

13.3 Results

13.3.1 Best Practice Sharing with Other Utilities

In 2025, PacifiCorp hosted two Western Utilities Wildfire Communications Workshops—one in March to prepare for the upcoming wildfire season and another in November to discuss learnings from the most recent wildfire season. Key takeaways from the event include:

- Continued need for education on PSPS and other types of wildfire de-energization with customers and communities. This can be done in a variety of ways before and during wildfire season.

- There are multiple approaches to wildfire safety and prevention outreach that can help meet regulatory requirements. A shift to meeting customers "where they are" and tapping into existing events could increase understanding and awareness.
- Tailoring wildfire information by region/location is well received by customers, such as targeted emails to communities impacted by wildfire outages; sharing information on local wildfire mitigation projects at events; working with local and regional media to talk about wildfire safety year-round; etc.
- Making communications accessible, including providing multilingual, in-person, and virtual options; best practices around design and language will need to be a focus for utilities if they want to truly reach the whole community.
- There are opportunities for utilities to educate and communicate through third-party voices to help increase understanding and awareness, such as inviting public safety partners to speak/present alongside utilities on wildfire safety, engaging local meteorologists on situational awareness tools provided by utilities for wildfire safety, having regulators speak to customers on the partnership between utilities and regulators in keeping the community safe, etc.
- While each utility has a unique service area with diverse communities, the need for collaboration and information sharing is in the best interest of all utilities.

13.3.2 Collaboration on Local Wildfire Mitigation Planning

PacifiCorp has hosted or attended over 50 local public safety partner meetings to date. Meetings include local emergency management meetings, local emergency planning committees, the Regional Disaster Preparedness Organization, and others to name a few. PacifiCorp provided PSPS and wildfire preparedness presentations to various local and state partners and organizations, including Oregon Health Authority, Oregon Department of Emergency Management, Oregon Emergency Management Association, Oregon Counties Association, and Eastern Oregon Correctional Institution.

13.3.3 WMP Engagement, Outreach, and Education Awareness Program

PacifiCorp hosted or participated in 22 community events, including nine Oregon WMP in-person forums, with livestream ASL and Spanish interpretation. These forums are recorded and available on demand on YouTube.[14] PacifiCorp attended four safety fairs, with two fairs focused on providing services to the AFN population.

The wildfire safety and awareness paid advertising campaign included radio spots, digital over-the-top pre-roll video ads, display ads, and social media static and video ads—each delivered in English and Spanish. Metropolitan statistical areas in Oregon that were targeted through the paid campaign included Bend, Medford, Eugene, Pendleton, Hood River, Klamath Falls, Roseburg, Coos Bay, and East Portland-Metro. The campaign focused on four main topics: (1) emergency de-energization due to wildfire, (2) ESS, (3) wildfire prevention and preparedness, and (4) system hardening. A breakdown of outreach and engagement activities is shown in Table 13-1.

The call-to-action in each campaign asset compelled the audience to visit PacifiCorp's wildfire safety and preparedness online resources.[15] The various ads across multiple channels collectively received more than 22 million impressions. Engaging with local and regional news media outlets is another key component of the awareness and engagement campaign. During the 2025 wildfire season, Company wildfire safety and mitigation subject matter experts also provided 10 interviews and responded to nine inquiries on the topics of wildfire safety and prevention.

The 2025 webinar had 187 people join via livestream and an additional 654 views on YouTube. Future webinars will take place in the months leading up to the start of wildfire season.

PacifiCorp is a public utility, and as such, aims to develop a WMP that aligns with public interests. In 2025, consistent with OAR 860-300-0040, the Company conducted a series of nine in-person, live-

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[14] Pacific Power YouTube channel: https://www.youtube.com/@PacificPower1/playlists.
[15] Pacific Power safety and preparedness resources website: https://www.pacificpower.net/outages-safety/storm-emergency-preparedness/safety-preparedness-resources.html.

streamed public engagement events designed to communicate an overview of its 2025 WMP, provide an environment for direct questions and answers, and foster public engagement in the Company's overall wildfire mitigation planning processes. Table 13-3 below provides information on the location, date, event type, and attendance details for these events. Below in Figure 13-6 is a map showing the locations of the community outreach and engagement events in PacifiCorp's Oregon service territory and the HFRZ.

Table 13-3: Community Outreach and Engagement Events

Community	County	Date	Event Type	Total Attendees (In Person + Virtual)	Virtual Attendees	Public Safety Partner Booths
Pilot Rock	Umatilla	4/15/25	Hybrid	32	6	0
Moro	Sherman	4/16/25	Hybrid	29	4	0
Hood River	Hood River	4/17/25	Hybrid	43	9	0
Sweet Home	Linn	4/22/25	Hybrid	43	5	2
Lincoln City	Lincoln	4/23/25	Hybrid	36	4	1
Astoria	Clatsop	4/24/25	Hybrid	31	4	1
Medford	Jackson	5/13/25	Hybrid	84	15	2
Grants Pass	Josephine	5/14/25	Hybrid	64	7	1
Bend	Deschutes	5/15/25	Hybrid	36	5	0
	TOTALS			**398**	**59**	**7**

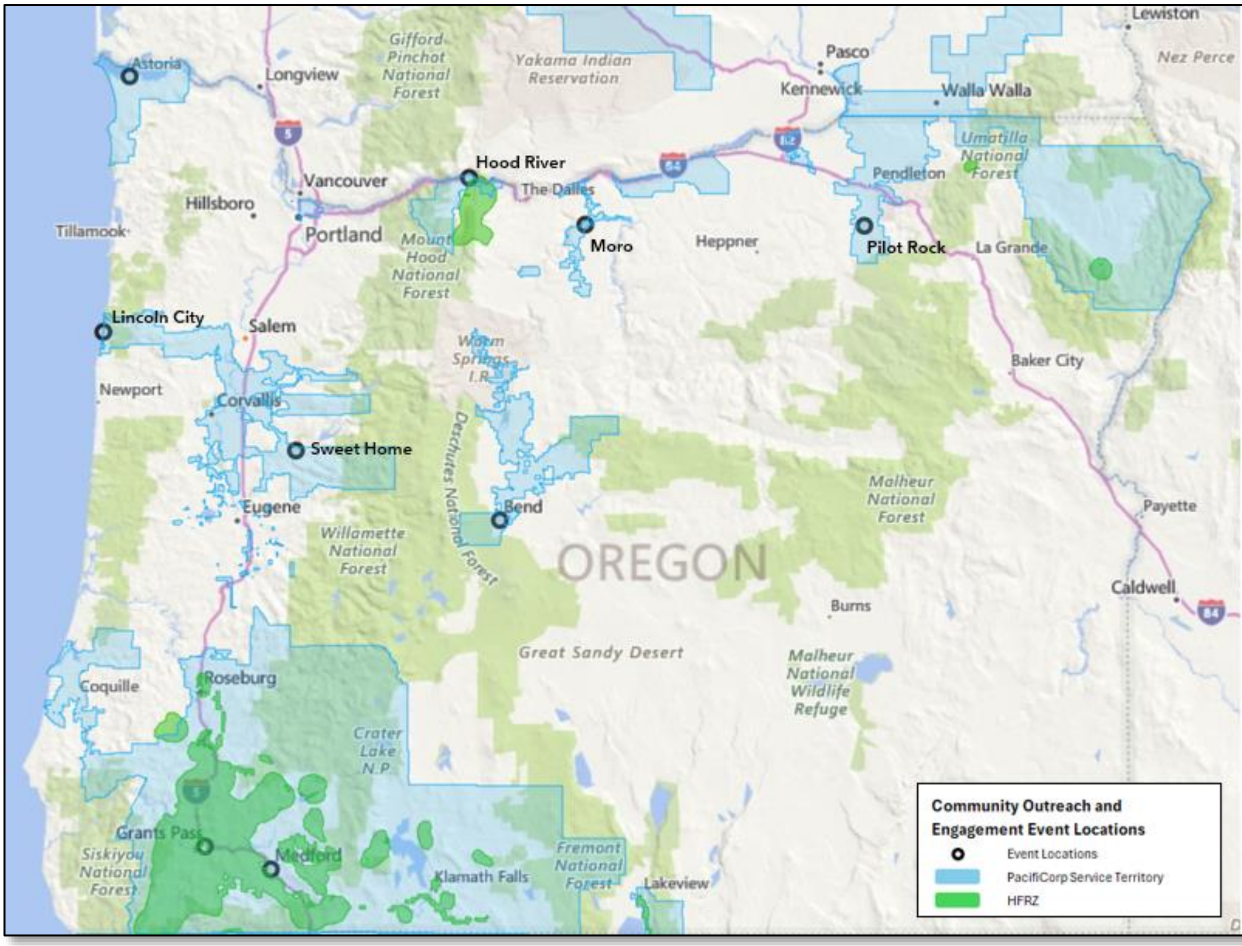

Figure 13-6: Oregon Community Outreach and Engagement Event Locations

13.3.4 Community Outreach and Engagement – Performance Monitoring

PacifiCorp conducted a series of online and phone surveys between September 30 and October 13, 2025, to measure the public's awareness of messaging related to wildfire preparedness and safety. Details and full survey results of PacifiCorp's Wildfire Communications Customer Survey can be found in Appendix F.

Highlights from the survey include the following:

- Awareness of wildfire communications: 69% of survey respondents are aware of wildfire safety communications, significantly higher than in April 2025 (57%). PacifiCorp remains the primary source for wildfire preparedness information (43%),

- **Information source:** Email, TV news, and the Company website are the primary channels for wildfire preparedness communications. Recall of email increased significantly since April 2025 (47% vs. 34%), while recall of TV news decreased (34% vs. 37%). Notifications via text message (46%) remain the most effective communication method, followed by email (35%), both consistent with the pre-season survey. The Company website remains the clearest source of information, followed by bill message or insert, while community meetings or events remain seen as the most useful source, followed by the Company website.
- **Prevention and preparedness actions:** 51% of respondents have taken action to prevent wildfires or to prepare their home or business for a wildfire, up significantly from April 2025 (47%). Trimming vegetation around properties is the most common action taken (72%). 49% are aware of PacifiCorp's efforts to prune vegetation around power lines in high-risk areas and remains the most common effort recalled, up significantly from April (45%).
- **De-energization awareness:** 78% of respondents are aware that PacifiCorp may de-energize lines during wildfire season, up significantly from April 2025 (70%). Roughly four in 10 (41%) are aware of the phrase "public safety power shutoff," or "PSPS"; 31% are aware of "emergency de-energization"; and 21% are aware of "enhanced safety settings." Awareness of all three terms saw a significant increase since April. Email and TV news are the main sources of de-energization communication, with email seeing a significant increase (38% vs. 26%) and TV news seeing a decrease since April (36% vs. 44%).
- **PSPS awareness:** 62% understand the following statement about PSPS: "For areas at a higher risk of fast-spreading catastrophic wildfires, the utility will proactively shut off power during extreme and dangerous weather," up significantly from April 2025 (53%). Half (50%) agree that notifications should be sent if there is any possibility of a PSPS, down from April 2025 (54%), and 39% say notifications should be sent if there is a high likelihood, up since April (36%). Six in 10 (60%) are aware of PacifiCorp's website where information on PSPS events may be found, up significantly from April 2025 (51%).

- **Contact with PacifiCorp:** 53% of respondents are aware they can contact PacifiCorp for wildfire safety information, up significantly since April 2025 (44%). Among those aware, only 4% have contacted PacifiCorp. Vegetation management remains the most common topic discussed during these contacts, and 85% of those who have contacted PacifiCorp report they received the information needed. Outage alerts remain the resource with the highest awareness (84%), up significantly since April 2025 (82%). Of those aware, usage of outage alerts also remains the highest (81%), consistent with April (79%). Satisfaction with outreach and engagement saw significant increases across the board compared with April 2025. Roughly four in 10 are satisfied with each of the statements about outreach and engagement.
- **Contact information:** 80% are aware of the ability to update their contact information for PSPS, up significantly from April 2025 (72%). Of those, just over four in 10 (42%) have updated their contact information, up significantly from April (39%). 77% are aware they can update notification preferences with PacifiCorp, up significantly since April (73%), and 48% of those aware have done so, also up significantly since April (43%).
- **AFN customers:** Just over one in four (26%) are identified as AFN, down significantly from April 2025 (29%).[16]

13.3.5 Community Outreach and Engagement – Other

Customer Service Interactions

In 2025, the Company received 43 calls from Oregon customers regarding wildfire safety. Of those, 21 occurred in July at the peak of fire season.

[16] In 2025, PacifiCorp revised survey questions related to AFN self-identification to mitigate false positives.

13.4 Initiatives and Targets

13.4.1 Initiative Summary Table

In Table OPUC 13-1, PacifiCorp presents its 2026–2028 community outreach and engagement initiatives and targets.

Table OPUC 13-1: Community Outreach and Public Awareness Initiative Cost Summary in Thousands

Initiative Activity	Tracking ID	Target Unit	2026 Target	2026 Forecast ($1,000)	2027 Target	2027 Forecast ($1,000)	2028 Target	2028 Forecast ($1,000)	Three-Year Total ($1,000)	Section
Western Utilities Wildfire Communications Workshop	OR-CO-04	Events	Complete one pre-season event; complete one post-season event	[redacted]	Complete one pre-season event; complete one post-season event	[redacted]	Complete one pre-season event; complete one post-season event	[redacted]	[redacted]	13.2.1
Wildfire Communication Customer Surveys	OR-CO-05	Qualitative	Measurement of awareness levels of PacifiCorp's communication efforts	[redacted]	Measurement of awareness levels of PacifiCorp's communication efforts	[redacted]	Measurement of awareness levels of PacifiCorp's communication efforts	[redacted]	[redacted]	13.2.5, 13.5.3, Appendix F
Wildfire Community Events	OR-CO-11	Events	8-10 wildfire community events	[redacted]	8-10 wildfire community events	[redacted]	8-10 wildfire community events	[redacted]	[redacted]	13.2.4, 13.5.1
Wildfire Safety and Preparedness Communications	OR-CO-12	Qualitative	Measurement of awareness of wildfire communications efforts	[redacted]	Measurement of awareness of wildfire communications efforts	[redacted]	Measurement of awareness of wildfire communications efforts	[redacted]	[redacted]	13.2.2

13.5 Continuous Improvement

13.5.1 Engagement with Access and Functional Needs Populations or Environmental Justice Communities

In 2025, PacifiCorp launched several new efforts to improve customer access to preparedness programs that build resilience among the AFN community. These were informed by customer surveys, interviews, and feedback from CBOs and other partners. PacifiCorp shares these resources with public safety partners, CBOs, and other organizations that support AFN communities, via email campaigns, presentations, preparedness fairs, meetings, and routine coordination with partners. PacifiCorp will update and continue to share these resources annually.

13.5.2 WMP Engagement, Outreach, and Education Awareness Program

Tracking ID: OR-CO-11

As part of PacifiCorp's efforts to improve community engagement around wildfire prevention and safety, new locations and formats will be investigated for the Company's community forums/events going into 2026. PacifiCorp is sharing information with other utilities about how the Company engages the community in an effort to improve event attendance and availability. PacifiCorp's outreach approach for 2026 through 2028 will also be informed by feedback from customers, public safety partners, health care organizations, CBOs, and other AFN service providers as found in the customer surveys and partners interview findings. Areas for programmatic and technical outreach and awareness improvement for 2026–2028 include:

- Continue to identify local events to attend or share wildfire information.
- Explore additional ways to communicate the PSPS process with customers and communities.
- Continue to identify additional local partners to help amplify wildfire preparedness information.
- Look for ways to expand wildfire communication efforts year-round to ensure customers maintain awareness, as needed.

- Explore additional ways to target outreach to customers with AFN.

13.5.3 Community Outreach and Engagement – Performance Monitoring

Tracking ID: OR-CO-05

Based on survey results from Oregon customers and feedback from public safety partners and CBOs, PacifiCorp will look at the following actions to improve communication and understanding with customers:

- Continue efforts to promote wildfire safety information across a variety of platforms and formats to ensure customers are receiving the message where they are.
- Leverage public safety partners and CBOs to help share information on wildfire preparedness and safety. This includes providing materials and toolkits to partners to make sharing easier with their clients and communities.
- Encourage customers to update their contact information and set up their communications preferences to ensure they receive safety messages.
- Keep the Company website updated with wildfire safety and prevention information, including engaging videos and links to handouts, and using plain language.
- Share information localized to customers' area to help them understand their risk and the actions PacifiCorp is taking to provide safe, reliable power.

13.5.4 Community Outreach and Engagement – Other

Operations-based Exercises on Public Safety Partner Communication

To further strengthen its operational procedures, PacifiCorp Communications conducts an internal tabletop exercise to review wildfire community engagement processes before the season starts each year. The last exercise was held March 17, 2025, and PacifiCorp Communications will conduct another internal exercise in February 2026.

14. Industry Engagement

14.1 Overview

Industry collaboration is an important component of PacifiCorp's WMP. Through active participation in workshops, consortiums, and advisory boards, the Company maintains an understanding of best practices, emergent technologies, and research.

14.2 Strategy

Tracking ID: OR-IE-01

PacifiCorp collaborates with utilities as an active member of the International Wildfire Risk Mitigation Consortium (IWRMC), an industry-sponsored collaborative designed to facilitate the sharing of wildfire risk mitigation insights and discovery of innovative and unique utility wildfire practices from across the globe. This consortium, with working groups focused on areas of asset management, operations and protocols, risk management, and vegetation management, facilitates a system of working and networking channels between members of the global utility community to support the ongoing sharing of data, information, technology, and practices.

IWRMC also administers the Wildfire Risk Mitigation Maturity Model, which was developed collaboratively among IWRMC member utilities. The maturity model focuses on 45 key capabilities organized into nine broad categories as shown in Figure 14-1. The IWRMC model has been, and continues to be, tested among the consortium's membership to validate findings and identify opportunities for collective and individual utility improvement. PacifiCorp undertook the maturity survey in 2025, and a summary of the results is in Appendix G.

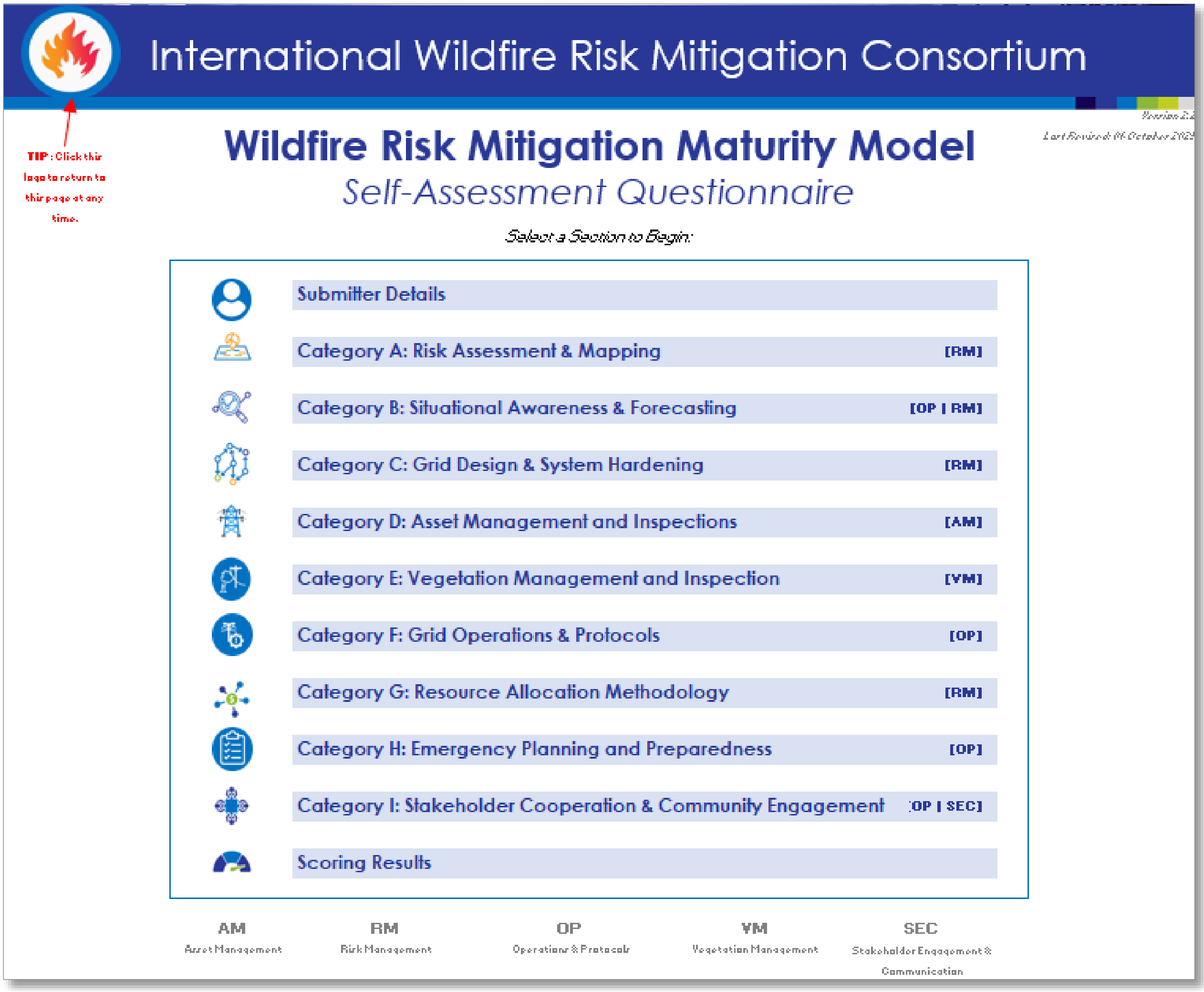

Figure 14-1: IWRMC Maturity Model Categories

PacifiCorp also participates in other industry trade associations such as the Edison Electric Institute (EEI), Electric Power Research Institute (EPRI), and the Institute of Electrical and Electronics Engineers (IEEE). Within the Western United States, PacifiCorp also engages with the Western Energy Institute (WEI). At the direction of the California Office of Energy infrastructure Safety (Energy Safety), PacifiCorp participates in the Risk Modeling Working Group (RMWG).

PacifiCorp collaborates directly with other utilities such as Oregon IOUs on topics such as risk modeling and WMP development. The Company participates in joint California IOU meetings to discuss topics related to wildfire mitigation work, including WMP development, undergrounding, and the potential use of Advanced Meter Infrastructure to detect faults. In addition, PacifiCorp participates in meetings hosted by Pacific Gas and Electric regarding system protection related to wildfire. PacifiCorp also collaborates on research and applications of technologies through the Company's parent company, Berkshire Hathaway Energy (BHE), and its affiliates, the climate vulnerability assessment initiative being performed by Argonne National Laboratory discussed in Section 9.5.6.

14.3 Results

Table OPUC 14-1 summarizes PacifiCorp's industry engagements through the end of November 2025.

Table OPUC 14-1: Industry Engagements

Date	Meeting	Agency / Organization	Topic	Key Takeaways	Program/Project/Pilot Informed by Meeting
1/7/2025	California Utility Wildfire Risk Reduction Meeting: System Protection	PG&E	Share information on system protection methods		Grid Operations
1/8/2025	Oregon Joint IOU Meeting	N/A	WMP template and terminology	2026-2028 WMP	WMP template and terminology for UM 2340
1/10/2025	CA Joint IOU Meeting	SCE	2025-2028 WMP	CA WMP	Follow up on PAC SMEs attending Joint IOU discussion on WMP Table 3-2
1/13/2025	IWRMC Ops & Protocols WG Monthly Meeting	IWRMC	GridWrap, survey results	Survey results	
1/14/2025	IWRMC Asset Mgmt WG Monthly Meeting	IWRMC	Annual conference topics, LiDAR/drone inspections, EFD experiences	Annual conference topics, LiDAR/drone inspections, EFD experiences	Asset Management Grid Operations
1/15/2025	Oregon Wildfire & Electric Collaborative	OPUC	Assessing risk exposure and mitigation planning	ESS	Grid Operations
1/13-1/15/2025	American Meteorological Annual Meeting	Other	First Annual Fire Weather, Technology and Risk Conference	Conference focused on current research in fire weather research, new technology related to fire weather forecasting and fire risk	Situational Awareness
1/21/2025	IWRMC Executive Strategy Session	IWRMC	Government plans, insurance, methodologies for risk reduction		Risk Assessment

Date	Meeting	Agency / Organization	Topic	Key Takeaways	Program/Project/Pilot Informed by Meeting
1/22/2025	Oregon Joint IOU Meeting	N/A	WMP template and terminology	2026-2028 WMP	WMP template and terminology for UM 2340
1/22/2025	Risk Modeling Working Group	Energy Safety	Kickoff and 2025 plans	Risk modeling	Review proposed best practices documentation
1/27/2025	Wildfire Safety Advisory Board	Cal Fire	Southern California Wildfire Update, Research of fire spread between homes	N/A	Collecting data from the Southern California fires about the conditions of buildings to understand what made some building more resilient.
2/7/2025	Oregon Joint IOU Meeting	OPUC	Risk modeling calibration, WMP alignment	Risk modeling commonalities	Risk Assessment
2/10/2025	IWRMC Ops & Protocols WG Quarterly Webinar	IWRMC	Conference topics, Ubicquia UbiVu (smart monitoring), PowerConnect.AI (customized AI for utility customer service)		
2/11/2025	Asset & Risk Management Monthly Meeting	IWRMC	Participants can seek support and input on emergent issues or high-urgency concerns	Share updates for annual conference and asset management section of agenda; presentation on conductor fatigue ignition failures, presentation on pole fleet analysis; participants are aware of the actual outcomes of the meeting and their follow-up actions	Multiple
2/11/2025	USFS Region 6 Power Generation and Transmission Fire Planning	US Forest Service	Asset risk ranking demonstration, GIS data sharing process	Ongoing data sharing work with USFS R6 staff, PGE, BPA, and PAC	Emergency Management
2/17/2025	USFS Region 6 Power Generation and Transmission Fire Planning	US Forest Service	Asset risk ranking demonstration, GIS data sharing process	Ongoing data sharing work with USFS R6 staff, PGE, BPA, and PAC	Emergency Management
2/18/2025	USFS Region 6 Power Generation and Transmission Fire Planning	US Forest Service	Asset risk ranking demonstration, GIS data sharing process	Ongoing data sharing work with USFS R6 staff, PGE, BPA, and PAC	Emergency Management
2/18/2025	California Utility Wildfire Risk Reduction Meeting: System Protection	PG&E	Share information on system protection methods	Share information on system protection methods	Grid Operations
2/19/2025	Oregon Joint IOU Meeting	N/A	WMP template and terminology	WMP template and terminology for UM 2340	2026-2028 WMP
2/25/2025	USFS Region 6 Power Generation and Transmission Fire Planning	US Forest Service	Critical infrastructure GIS data sharing	Ongoing data sharing work with USFS R6 staff, PGE, BPA, and PAC	Emergency Management

Date	Meeting	Agency / Organization	Topic	Key Takeaways	Program/Project/Pilot Informed by Meeting
2/26/2025	Risk Modeling Working Group	Energy Safety	Best practice outline, catastrophic fires and tail risk	Best practice outline, catastrophic fires and tail risk	Risk Assessment
3/3/2025	Western Energy Institute Wildfire Mitigation and Planning Conference	Western Energy Institute	Wildfire mitigation plans, operational practices, system hardening, emerging technologies	Wildfire mitigation plans, operational practices, system hardening, emerging technologies	Operational Practices, System Hardening,
3/5/2025	Oregon Joint IOU Meeting	N/A	WMP template and terminology	WMP template and terminology for UM 2340	2026-2028 WMP
3/12/2025	California Joint IOU Meeting	PG&E	HFRA boundary updates, ad hoc topics, WMP, maturity survey	Risk modeling, effectiveness measurement	Risk Assessment
3/26/2025	Risk Modeling Working Group	Energy Safety	Best practice outline, consequences-natural units and monetized units, risk framework	Best practices for monetization of wildfire consequence	Risk Assessment
3/29/2025	Oregon Joint IOU Meeting	N/A	Risk modeling workshops	Risk modeling, effectiveness measurement	Risk Assessment, 2026-2028 WMP
4/2/2025	OR WMP Risk Modeling and Effectiveness Workshops	OPUC	Risk modeling inputs and outputs	Risk modeling, effectiveness measurement	Risk Assessment, 2026-2028 WMP
4/4/2025	Oregon Joint IOU Meeting	N/A	Risk modeling workshops	Risk modeling, effectiveness measurement	Risk Assessment, 2026-2028 WMP
4/9/2025	OR WMP Risk Modeling and Effectiveness Workshops	OPUC	Risk modeling inputs and outputs	Risk modeling, effectiveness measurement	Risk Assessment, 2026-2028 WMP
4/11/2025	Oregon Joint IOU Meeting	N/A	Risk modeling workshops	Risk modeling, effectiveness measurement	Risk Assessment, 2026-2028 WMP
4/14/2025	Western Region Mutual Assistance Conference	Other	Emergency response & mutual assistance practices	Emergency response and mutual assistance practices	Emergency Management
4/16-4/17/2025	Utility Wildfire, Weather and Analytics Summit	N/A	Annual conference of organization	Annual conference of organization	Situational Awareness
4/17/2025	USFS Region 6 Power Generation and Transmission Fire Planning	US Forest Service	Critical infrastructure GIS data sharing	Ongoing data sharing work with USFS R6 staff, PGE, BPA, and PAC	Emergency Management
4/18/2025	Oregon Joint IOU Meeting	N/A	Risk modeling workshops	Risk modeling, effectiveness measurement	Risk Assessment, 2026-2028 WMP
4/22/2025	Utility Counterpart Collaboration (PAC, PGE)	Other	Collaboration kick-off with PAC & PGE		Counterpart introductions, contact exchange, program updates

Date	Meeting	Agency / Organization	Topic	Key Takeaways	Program/Project/Pilot Informed by Meeting
4/26/2025	OR WMP Risk Modeling and Effectiveness Workshops	OPUC	Risk modeling inputs and outputs	Risk modeling, effectiveness measurement	Risk Assessment, 2026-2028 WMP
4/23/2025	IWRMC Ops/Protocols and Asset Management WG Monthly Meeting	IWRMC	Annual conference	Working group calendar outlook; IWRMC SharePoint repository review; administrative items and close	Multiple
4/23/2025	OR WMP Risk Modeling and Effectiveness Workshops	OPUC	Risk modeling inputs and outputs	Risk modeling, effectiveness measurement	Risk Assessment, 2026-2028 WMP
4/25/2025	Oregon Joint IOU Meeting	N/A	Risk modeling workshops	Risk modeling, effectiveness measurement	Risk Assessment, 2026-2028 WMP
5/1/2025	2nd Annual PGE Meteorology Partners Meeting	N/A	Utility and federal partners annual meeting	Meeting was for Oregon utilities to meet with federal partners prior to fire season to discuss new technologies and provide updates from each organization	Situational Awareness
4/30/2025	OR WMP Risk Modeling and Effectiveness Workshops	OPUC	Risk modeling inputs and outputs	Risk modeling, effectiveness measurement 2026-2028 WMP	Risk Assessment, 2026-2028 WMP
5/2/2025	Oregon Joint IOU Meeting	N/A	Risk modeling workshops	Risk modeling, effectiveness measurement	Risk Assessment, 2026-2028 WMP
5/6/2025	Utility Counterpart Collaboration (PAC, PGE, BPA)	US Forest Service	Utility SME wildfire response and operations collaboration	Ongoing data sharing work with USFS R6 staff, PGE, BPA, and PAC	Emergency Management
5/7/2025	OR WMP Risk Modeling and Effectiveness Workshops	OPUC	Risk modeling inputs and outputs	Risk modeling, effectiveness measurement	Risk Assessment, 2026-2028 WMP
5/9/2025	Oregon Joint IOU Meeting	N/A	Risk modeling workshops	Risk modeling, effectiveness measurement	Risk Assessment, 2026-2028 WMP
5/14/2025	OR WMP Risk Modeling and Effectiveness Workshops	OPUC	Risk modeling inputs and outputs	Risk modeling, effectiveness measurement	Risk Assessment, 2026-2028 WMP
5/14-5/15/2025	California Joint IOU Meeting	SDG&E	ESS, maturity survey, WMPs		Grid Operations
5/16/2025	Oregon Joint IOU Meeting	N/A	Risk modeling workshops	Risk modeling, effectiveness measurement	Risk Assessment, 2026-2028 WMP

Date	Meeting	Agency / Organization	Topic	Key Takeaways	Program/Project/Pilot Informed by Meeting
5/20/2025	Utility Counterpart Collaboration (PAC, PGE, BPA, ID Power)	US Forest Service	Utility SME wildfire response and operations collaboration	Joint coordination and support to enhance situational awareness, planning, and communications	Emergency Management
5/21/2025	OR WMP Risk Modeling and Effectiveness Workshops	OPUC	Risk modeling inputs and outputs	Risk modeling, effectiveness measurement	Risk Assessment, 2026-2028 WMP
5/23/2025	Oregon Joint IOU Meeting	N/A	Risk modeling inputs and outputs	Risk modeling, effectiveness measurement	Risk Assessment, 2026-2028 WMP
5/28/2025	OR WMP Risk Modeling and Effectiveness Workshops	OPUC	Risk modeling inputs and outputs	Risk modeling, effectiveness measurement	Risk Assessment, 2026-2028 WMP
5/30/2025	Oregon Joint IOU Meeting	N/A	WMP template and terminology	2026-2028 WMP	Alignment on WMP template and terminology for UM 2340 filing
6/3/2025	Utility Counterpart Collaboration (PAC, PGE, BPA, ID Power)	US Forest Service	Utility SME wildfire response and operations collaboration	Pre-season preparedness	Emergency Management
6/4/2025	Grid Forward Wildfire Symposium	Grid Forward	Standing Up to Wildfire: Practical Tech and Tactics for Utilities	Tech and tactics for utilities	Wildfire Mitigation Plan, Emergency Management, Vegetation Management, Grid Hardening
6/4/2025	Wildfire Safety Advisory Board	Cal Fire	Multiple including WMPs, risk modeling, safety culture	Recommendations for 2029-2031 risk assessment requirements	2029-2031 WMP
6/6/2025	Oregon Joint IOU Meeting	N/A	WMP template and terminology	2026-2028 WMP	Agreement on WMP template and terminology for UM 2340
6/13/2025	California Joint IOU Meeting	SDG&E	Draft Annual Report on Compliance standards	Annual report on compliance	Annual Report on Compliance
6/17/2025	Utility Counterpart Collaboration (PAC, PGE, BPA, ID Power)	US Forest Service	Utility SME wildfire response and operations collaboration	Active incident status updates across utility territories Program updates	Emergency Management
6/25/2025	IWRMC Joint Vegetation and Risk Management Working Group	IWRMC	Tree Flammability Study, Legal & Regulatory, Technology & Innovation	Tree flammability study, legal and regulatory, technology and innovation	Vegetation Management
6/25/2025	Risk Modeling Working Group	Energy Safety	Non-utility mitigations and infrastructure, population and socio-economic factors, approaches document	Risk modeling	Risk Assessment

Date	Meeting	Agency / Organization	Topic	Key Takeaways	Program/Project/Pilot Informed by Meeting
6/27/2025	Oregon Joint IOU Meeting	N/A	UM 2340 recommendations	Updates to proposed WMP template	2026-2028 WMP
7/1/2025	Utility Counterpart Collaboration (PAC, PGE, BPA, ID Power)	US Forest Service	Utility SME wildfire response and operations collaboration	Active incident status updates across utility territories, program updates	Emergency Management
7/9-7/10/2025	Joint IOU Meeting	Hawaiian Electric	Watch officers, field observing during weather events, ignition management, ESS, grid hardening long spans, ingress/egress, mitigation effectiveness, project definition and prioritization, unit cost management	Watch officers, field observing during weather events, ignition management, ESS, grid hardening long spans, ingress/egress, mitigation effectiveness, project definition and prioritization, unit cost management	Operational Practices, Grid Operations, Risk Assessment
7/11/2025	Oregon Joint IOU Meeting	N/A	UM 2340 recommendations	Updates to proposed WMP template	2026-2028 WMP
7/15/2025	Utility Counterpart Collaboration (PAC, PGE, BPA, ID Power)	US Forest Service	Utility SME wildfire response and operations collaboration	Active incident status updates across utility territories, program updates	Emergency Management
7/17/2025	Washington Wildfire Mitigation Group	WUTC	Metrics, how to find WMPs from across the use	Metrics, how to find WMPs from across the US for references	WMP Development
7/18/2025	Oregon Joint IOU Meeting	N/A	UM 2340 recommendations	Updates to proposed WMP template	2026-2028 WMP
7/25/2025	Oregon Joint IOU Meeting	N/A	Risk modeling	Proposed RSE workbook	2026-2028 WMP
7/27-7/31/2025	IEEE PES General Meeting		Distribution Reliability Working Group meeting	Reviewed reliability benchmarks; discussed potential future changes to IEEE 1366 and IEEE 1782 including cause codes and the inclusion/impact of wildfire impact on reliability metrics (i.e. fast-trip settings, emergency de-energizations, and PSPS)	Risk Assessment
7/29/2025	Utility Counterpart Collaboration (PAC, PGE, BPA, ID Power)	US Forest Service	Utility SME wildfire response and operations collaboration	Active incident status updates across utility territories, program updates	Emergency Management
8/1/2025	Oregon Joint IOU Meeting	N/A	Risk modeling	Proposed RSE workbook	2026-2028 WMP
8/5/2025	Wildfire Insights and Support for Electric (WISE) Utilities Informational Webinar	N/A	PNNL: Technical Support for Wildfire Mitigation Planning and Mitigations for Utilities	Grant is available to provide technical guidance to utilities on mitigation topics	2026-2030 WMPs
8/8/2025	Oregon Joint IOU Meeting	N/A	Risk modeling	Proposed RSE workbook	2026-2028 WMP

Date	Meeting	Agency / Organization	Topic	Key Takeaways	Program/Project/Pilot Informed by Meeting
8/8/2025	Joint IOU Meeting	Hawaiian Electric	Potential new innovations for wildfire mitigation and suppressions, WMP updates	New tools to support suppression of fire using sound	Operational Practices
8/12/2025	Utility Counterpart Collaboration (PAC, PGE, BPA, ID Power)	US Forest Service	Utility SME wildfire response and operations collaboration	Active incident status updates across utility territories, program updates	Emergency Management
8/15/2025	Oregon Joint IOU Meeting	N/A	WMP template	WMP template	2026-2028 WMP
8/21/2025	Washington Wildfire Mitigation Group	WUTC	Grants	Grant opportunities available in Washington	N/A
8/22/2025	Oregon Joint IOU Meeting	N/A	WMP template	WMP template	2026-2028 WMP
8/26/2025	Utility Counterpart Collaboration (PAC, PGE, BPA, ID Power)	US Forest Service	Utility SME wildfire response and operations collaboration	Active incident status updates across utility territories, program updates	Emergency Management
8/29/2025	Oregon Joint IOU Meeting	N/A	WMP template	WMP template	2026-2028 WMP
9/5/2025	Oregon Joint IOU Meeting	N/A	WMP template	WMP template	2026-2028 WMP
9/9/2025	Utility Counterpart Collaboration (PAC, PGE, BPA, ID Power)	US Forest Service	Utility SME wildfire response and operations collaboration	Active incident status updates across utility territories, program updates	Emergency Management
9/10-9/11/2025	Joint IOU Meeting	Bear Valley Electric Services	Update guidelines, ESS, PSPS preparation, compliance and reporting practices	2027 WMP update	2026-2028 WMP, PSPS, Grid Operations
9/12/2025	Oregon Joint IOU Meeting	N/A	WMP template	WMP template	2026-2028 WMP
9/19/2025	Oregon Joint IOU Meeting	N/A	WMP template	WMP template	2026-2028 WMP
9/23/2025	Utility Counterpart Collaboration (PAC, PGE, BPA, ID Power, PSE)	US Forest Service	Utility SME wildfire response and operations collaboration	Active incident status updates across utility territories, program updates	Emergency Management
9/26/2025	Oregon Joint IOU Meeting	N/A	WMP template	WMP template	2026-2028 WMP
10/3/2025	Oregon Joint IOU Meeting	N/A	WMP template	WMP template	2026-2028 WMP
10/7/2025	Utility Counterpart Collaboration (PAC, PGE, BPA, ID Power, PSE)	US Forest Service	Utility SME wildfire response and operations collaboration	Active incident status updates across utility territories, program updates	Emergency Management
10/10/2025	Oregon Joint IOU Meeting	N/A	WMP template	WMP template	2026-2028 WMP

Date	Meeting	Agency / Organization	Topic	Key Takeaways	Program/Project/Pilot Informed by Meeting
10/10/2025	Joint IOU Meeting	Bear Valley Electric Services	SB 254 impacts, November meeting agenda	N/A	2029-2031 WMP
10/14-10/15/2025	Technology Benchmarking with PG&E	PG&E	New technology review and laboratory capabilities	New technology review and laboratory capabilities	Pilots
10/17/2025	Oregon Joint IOU Meeting	N/A	WMP template	WMP template	2026-2028 WMP
10/21/2025	Utility Counterpart Collaboration (PAC, PGE, BPA, ID Power, PSE)	US Forest Service	Utility SME wildfire response and operations collaboration	Active incident status updates across utility territories, program updates	Emergency Management
10/22/2025	Western Region Mutual Assistance Agreement Annual Meeting	Western Energy Institute	WEI WRMMA annual meeting		Emergency Management
10/23/2025	Post Wildfire Season Workshop for Utilities	WUTC	Post fire season	Post fire season: weather conditions, Washington energy threat risk assessment	Emergency Management
10/24/2025	Oregon Joint IOU Meeting	N/A	WMP template	WMP template	2026-2028 WMP
10/29/2025	Risk Modeling Work Group	Energy Safety	Technosylva Fire Potential Index	Technosylva presented a in depth discussion of the Fire Potential Index, including validation work and future work	Situational Awareness
10/31/2025	Oregon Joint IOU Meeting	N/A	WMP template, RSE workbook	WMP template, RSE workbook	2026-2028 WMP
11/4/2025	Utility Counterpart Collaboration (PAC, PGE, BPA, ID Power, PSE)	US Forest Service	Utility SME wildfire response and operations collaboration	Active incident status updates across utility territories, program updates	Emergency Management
11/4/2025	IWRMC Asset Mgmt. WG Monthly Meeting	IWRMC	Powerline inspection follow-up survey on deficiency categories	Asset inspections	Benchmarking and understanding the scope and frequency of utility inspections throughout the world
11/7/2025	Oregon Joint IOU Meeting	N/A	WMP template, RSE workbook	WMP template, RSE workbook	2026-2028 WMP
11/12-11/13/2025	CA and OR Joint IOU Meeting	PacifiCorp	ESS, vegetation management, equipment failure tracking, asset inspections	Asset inspections, vegetation management, ESS	Asset Inspections, Vegetation Management, ESS
11/14/2025	Oregon Joint IOU Meeting	N/A	WMP template, RSE workbook	WMP template, RSE workbook	2026-2028 WMP
11/18/2025	Utility Counterpart Collaboration (PAC, PGE, BPA, ID Power, PSE, Avista)	US Forest Service	Utility SME wildfire response and operations collaboration	Avista introductions	Emergency Management

Date	Meeting	Agency / Organization	Topic	Key Takeaways	Program/Project/Pilot Informed by Meeting
11/21/2025	Oregon Joint IOU Meeting	N/A	WMP template, RSE workbook	WMP template, RSE workbook	2026-2028 WMP
12/2/2025	IWRMC Asset Mgmt. WG Quarterly Webinar	IWRMC	Construction Standards to Mitigate Bushfire Risk	Wildfire Construction Standards	Benchmarking and asking questions to better understand how other utilities throughout the world construct their facilities to mitigate the risk of wildfires. Good discussion on the pros and cons of using covered conductor.
12/2/2025	Utility Counterpart Collaboration (PAC, PGE, BPA, ID Power, PSE, Avista)	US Forest Service	Utility SME wildfire response and operations collaboration	Upcoming 2026 incident management team meetings, 2026 utility wildfire program collaboration summit	Emergency Management
12/4/2025	Oregon Wildfire and Electric Collaborative	OPUC	State of the Planning – An Update on Wildfire Mitigation Planning in Oregon, wildfire mitigation strategies and lessons learned, fault location and deploying drones for PSPS patrols, ESS troubleshooting	Wildfire mitigation strategies and lessons learned, fault location and deploying drones for PSPS patrols, ESS troubleshooting	PSPS, Grid Operations
12/5/2025	Oregon Joint IOU Meeting	N/A	WMP template, RSE workbook	WMP template, RSE workbook	2026-2028 WMP
12/12/2025	Oregon Joint IOU Meeting	N/A	WMP template, RSE workbook	WMP template, RSE workbook	2026-2028 WMP
12/19/2025	Oregon Joint IOU Meeting	N/A	WMP template, RSE workbook	WMP template, RSE workbook	2026-2028 WMP

As part of the RMWG, PacifiCorp participated in the development of best practices for electrical utilities modeling wildfire risk from utility equipment. These best practices cover how to conduct the analyses and present the results for stakeholder review. The guidelines identify areas where consensus has been reached on industry standards and are documented and recommended for use. In areas where there is no consensus and where future improvements are necessary, developments are needed to improve best practices. PacifiCorp will continue to participate in RMWG meetings and apply the best practices to its risk modeling approaches described in Section 4.

PacifiCorp hosted Oregon, Hawaii, and California IOUs at a joint meeting November 12-13, 2025, to discuss common topics such as asset inspection, ESS, and vegetation management technologies. The meeting also included key functional updates on failure model analysis protocols, continuous monitoring, and data guidelines.

As described in Section 13.3, PacifiCorp hosted two Western Utilities Wildfire Communications Workshops: one in March 2025 to prepare for the upcoming wildfire season and one in November 2025 to discuss learnings from the most recent wildfire season.

14.4 Initiatives and Targets

14.4.1 Initiative Summary Table

Table OPUC 14-2 presents PacifiCorp's industry collaboration initiatives and targets.

Table OPUC 14-2: Industry Engagement Initiative Cost Summary in Thousands

Initiative Activity	Tracking ID	Target Unit	2026 Target	2026 Forecast ($1,000)	2027 Target	2027 Forecast ($1,000)	2028 Target	2028 Forecast ($1,000)	Three-Year Forecasted Total ($1,000)	Section
IWRMC Membership	OR-IE-01	Qualitative	Participation in IWRMC meetings and forums	[redacted]	Participation in IWRMC meetings and forums	[redacted]	Participation in IWRMC meetings and forums	[redacted]	[redacted]	14.2, Appendix F
EPRI Climate READi	OR-IE-02	Qualitative	Participation in EPRI meetings and forums	[redacted]	Participation in EPRI meetings and forums	[redacted]	Participation in EPRI meetings and forums	[redacted]	[redacted]	4.8.3, 14.2

In the 2026–2028 WMP cycle, PacifiCorp plans to continue its participation with IWRMC and EPRI. Participation in IWRMC allows the Company to benchmark maturity in wildfire mitigation through use of the Wildfire Risk Mitigation Maturity Model and learn the latest insights regarding wildfire mitigation and resiliency. Participation in EPRI Climate READi enables access to research examining the impact of extreme weather on energy infrastructure and explores strategies to enhance resilience.

14.5 Continuous Improvement

In the 2026–2028 WMP cycle, PacifiCorp plans to continue its outreach and collaboration with other utilities through forums such as the IWRMC, IEEE, and EPRI. Participation in these forums allows the Company to learn the latest insights regarding wildfire mitigation and resiliency. Participation in IWRMC allows the Company to benchmark maturity in wildfire mitigation through use of the Wildfire Risk Mitigation Maturity Model.

PacifiCorp will also continue its collaboration with other utilities through regular meetings with the IOUs in Oregon and California. These collaborations with IOUs on various topics help the Company learn about how other utilities are addressing the risk of wildfire through technologies, risk modeling, and operational practices. PacifiCorp will also continue to participate in the Oregon Wildfire and Electric Collaborative (OWEC) to share and learn from other utilities in Oregon.

Appendix A – Definition of Terms

Unless otherwise expressly stated, terms in this WMP have the meanings shown in this appendix.

Table A-1: Definitions of Terms

Term	Acronym	Definition
Access and functional needs populations	AFN	Per Oregon Code 411-425-0055, Oregon Needs Assessment/OR Dept of Human Services Access and functional needs populations includes individuals with developmental disabilities, physical disabilities, chronic conditions, limited English proficiency, and low income.
After action review	AAR	A structured process used to analyze actions after a project or event to identify what worked well, what didn't, and how to improve in the future.
Area of interest	AOI	Identified area recognized as elevated risk but has not been incorporated into the utility's HFRZ.
Artificial intelligence	AI	The simulation of human intelligence in machines.
Asset (utility)	–	Electric lines, equipment, or supporting hardware.
Bonneville Power Administration	BPA	A federal agency and a major supplier of electricity and transmission services in the Pacific Northwest, part of the United States Department of Energy.
Bureau of Land Management	BLM	An agency within the United States Department of the Interior responsible for administering United States federal lands.
Circuit miles	–	The total length in miles of separate transmission and/or distribution circuits, regardless of the number of conductors used per circuit (i.e., different phases). If different circuits are co-located on structures, each circuit's length is separately accounted for. This factor may be referenced to create context for risk footprint as well as when addressing mitigations like reconductor or underground conversion.
Communications	–	Media that communicate voice, data, text, or video over a distance using electrical, electronic, radio, microwave, or light wave transmissions.
Community outreach & public awareness	COPA	A WMP initiative category to capture how utilities are building partnerships, understanding communication styles, and addressing community needs.
Community resource center	CRC	Facilities that provide critical information to customers impacted by outages. The CRC may also provide impacted customers with access to other services such as device charging, internet access, clean water, and ice.
Community-based organization	CBO	A public or private nonprofit organization that is representative of a community or significant segments of a community and engaged in meeting that community's needs in the areas of social, human, or health services. Per OAR 410-180-0305. See also OAR 581-017-0651.
Consequence	–	The adverse effects of an event; may consider the hazard intensity, community exposure, local vulnerability, or other factors.
Contact by object ignition likelihood	–	The likelihood that a non-vegetation object (such as a balloon or vehicle) will contact utility-owned equipment and result in an ignition.
Contact by vegetation ignition likelihood	–	The likelihood that vegetation will contact utility-owned equipment and result in an ignition.
Contractor	–	Any individual in the temporary and/or indirect employ of the electrical utility whose limited hours and/or time-bound term of employment are not considered "full-time" for tax and/or any other purposes.

Term	Acronym	Definition
Critical facilities and infrastructure	–	Facilities and infrastructure that operate at the community level and are essential to public safety and that require additional assistance and advance planning to ensure resiliency during PSPS events. These include the following: Emergency services sector: Police stations, fire stations, emergency operations centers, public safety answering points (e.g., 9-1-1 emergency services) Government facilities sector: Schools, jails and prisons Health care and public health sector: Public health departments, medical facilities, including hospitals, skilled nursing facilities, nursing homes, blood banks, health care facilities, dialysis centers, and hospice facilities (excluding doctors' offices and other non-essential medical facilities) Energy sector: Public and private utility facilities vital to maintaining or restoring nominal service, including, but not limited to, interconnected publicly owned electrical utilities and electric cooperatives Water and wastewater systems sector: Facilities associated with provision of drinking water or processing of wastewater, including municipal facilities that pump, divert, transport, store, treat, and deliver water or wastewater Communications sector: Communication carrier infrastructure, including selective routers, central offices, head ends, cellular switches, remote terminals, and cellular sites Chemical sector: Facilities associated with manufacturing, maintaining, or distributing hazardous materials and chemicals Transportation sector: Facilities associated with transportation for civilian and military purposes: automotive, rail, aviation, maritime, or major public transportation
Customer	–	A person who has applied for, has been accepted, and is currently receiving electric service.
Customer Average Interruption Duration Index	CAIDI	The average time required to restore service.
Customer hours interrupted	–	Sum of customer minutes of interruption (e.g., of power outage), divided by 60.
Customer-meters	–	Delivery point from electric utility to customer receiving service.
Dead fuel	–	Fuel with no living tissue, in which moisture content is governed almost entirely by atmospheric moisture (relative humidity and precipitation), dry-bulb temperature, and solar radiation.
Department of Energy	DOE	A federal agency in the United States responsible for developing and implementing national energy policy and managing the country's nuclear infrastructure.
Detailed inspection	–	Detailed inspections include, but are not limited to, visual checks, pole test and treat programs (only required for pole Owners), or practical tests of all facilities, to the extent required to identify violations of Commission Safety Rules. Where facilities are exposed to extraordinary conditions (including High Fires Risk Zones) or when an Operator has demonstrated a pattern of non-compliance with Commission Safety Rules, the Commission may require a shorter interval between inspections. Per OAR 860-024-0011 (1)(A).
Distribution line	–	Refers to all lines below or equal to 34.5kV unless otherwise noted.
Early fault detection	EFD	Identification of potential equipment or system faults on the power grid before outages or major failures occur.
Edison Electric Institute	EEI	A trade association that represents all U.S. investor-owned electric companies.
Electric Power Research Institute	EPRI	An organization in the United States that conducts research, development, and demonstration projects for the benefit of the public.
Electrical utility	–	Every corporation or person owning, controlling, operating, or managing any electric plant for compensation within Oregon. "Reporting Operator" means an operator that serves 20 customers or more within Oregon.

Term	Acronym	Definition
Emergency	–	Any incident, whether natural, technological, or human caused, that requires responsive action to protect life or property but does not result in serious disruption of the functioning of a community or society.
Emergency management team	EMT	A group of individuals responsible for coordinating activities to mitigate, prepare for, respond to, and recover from emergencies and disasters.
Emergency Support Function-12	ESF-12	The Public Utility Commission of Oregon's role in supporting the State Office of Emergency Management for energy utility issues during an emergency.
Energy release component	ERC	A number related to the available energy per unit area within the flaming front at the head of a fire. It is a calculated output of the National Fire Danger Rating System (NFDRS). ERC is used to estimate the potential heat output of a fire and is an important factor in predicting fire behavior.
Equipment ignition likelihood	–	The likelihood that utility-owned equipment will cause an ignition through either normal operation (such as arcing) or failure.
Estimated restoration time **or** **Estimated time of restoration**	ERT ETR	The projected time when power or other services are expected to be restored after an outage.
European Centre for Medium-Range Forecasts	ECMWF	An independent intergovernmental organization supported by most European nations to provide accurate global weather forecasts.
Exercise	–	An instrument to train for, assess, practice, and improve performance in prevention, protection, response, and recovery capabilities in a risk-free environment.
Fall-in hazard	–	A term used to describe a tree that has the potential to impact powerlines and other equipment.
Fault	--	A term used to describe a disruption on the electrical network.
Fire	–	A sustained chemical reaction that occurs when fuel, oxygen, and heat come together in an exothermic reaction. A fire can go through several stages, including growth, fully developed, and decay. Ignition is the process of starting a fire, while fire is the sustained chemical reaction that occurs when fuel, oxygen, and heat join together.
Fire high consequence area	FHCA	See High Fire Risk Zone.
Fire intensity	–	A general term relating to the heat energy released by a fire.
Fire Potential Index	FPI	Landscape scale index used as a proxy for assessing real-time risk of a wildfire under current and forecasted weather conditions.
Fire season	–	The time of year when wildfires are most likely for a given geographic region due to historical weather conditions, vegetative characteristics, and impacts of climate change. Each electrical corporation defines the fire season(s) across its service territory based on a recognized fire agency definition for the specific region(s).
Fire weather	–	Weather conditions that influence fire ignition, behavior and suppression.
Fire Weather Watch	FWW	Issued by the NWS when the combination of dry fuels and weather conditions support extreme fire danger within the next 72 hours.
Frequency	–	The anticipated number of occurrences of an event or hazard over time.
Frequent PSPS events	–	More than one PSPS event per calendar year per line circuit.
Frequently asked question	FAQ	A list of common questions and their answers.
Functional exercise	FE	Exercises that examine or validate coordination, command, and control between various agencies. FEs are larger scale, last much longer (e.g., multiple days), require significantly more planning and coordination, and include deployment of resources to practice protocols and processes.
Geographic Information System	GIS	A computer system that analyzes and displays geographically referenced information.

Term	Acronym	Definition
Geographical designated area (ID and Name)		Geographical subareas that the utility identifies as having a level of fire risk above non-HFRZ (including areas of interest). The geographical areas are often contained within a single boundary/polygon or a localized grouping of areas. These areas may highlight specific area mitigation projects based on risk analysis for the given location. Examples of previous geographical designated areas provided in utility-filed WMPs include Idaho Power Company's (Austin Junction, OR, or Halfway, OR), PacifiCorp's (Hood River, Roseburg), Portland General Electric's (Zone 1, or Zone 5).
Goals	–	The electrical corporation's general intentions and ambitions related to their WMP, unless noted otherwise.
Great Basin Coordination Center	GBCC	The focal point for coordinating resources for wildland fire and other incidents throughout the Great Basin.
Grid design & system hardening	GDSH	A WMP initiative category to capture how utilities are designing and strengthening distribution, transmission, and substation infrastructure to reduce ignition risk, potential wildfire impacts, and potential PSPS impacts.
Grid hardening	–	Actions (such as equipment upgrades, maintenance, and planning for more resilient infrastructure) taken in response to the risk of undesirable events (such as outages) or undesirable conditions of the electrical system to reduce or mitigate those events and conditions, informed by an assessment of the relevant risk drivers or factors.
Grid operations and protocols	GOP	A WMP initiative category to capture how utilities are implementing operations and protocols to reduce wildfire risk across their systems. Other grid operations and protocols not relevant to wildfire risk reduction are not included within this initiative category.
Grid topology	–	General design of an electric grid, whether looped or radial, with consequences for reliability and ability to support PSPS (e.g., ability to deliver electricity from an additional source).
Hazard	–	A condition, situation, or behavior that presents the potential for harm or damage to people, property, the environment, or other valued resources.
Hazard exposure	–	The presence of people, infrastructure, livelihoods, environmental services and resources, and other high-value assets in places that could be adversely affected by a hazard.
HFRZ ignition prevention inspection	–	See Ignition Prevention Inspection.
HFRZ sub-area	–	If the reporting utility has more than one subarea distinction for levels of Wildfire Risk, indicating elevation of fire risk, for example. (For example, Tier 1, Tier 2or Tier 3, or Yellow and Red Risk Zones HFRZ and Area of Interest)
HFRZ zone ID	–	Used to identify specific utility-defined HFRZ zones. Zones are typically HFRZ areas specific to a select geographic location. For example, Oregon City, Medford, Halfway, Zone 1. In the Data Template Workbook, this is identified as an HFRZ geographic indicator.
High fire risk zone **or** **Fire high consequence area** **or** **Wildfire risk zone**	HFRZ FHCA WRZ	Geographic areas identified per OAR 860-024-0018, as areas potentially subject to heightened fire risk relative to other areas in the utility's service territory. Each IOU has its own naming convention for these areas: HFRZ: Portland General Electric HFRZ: PacifiCorp WRZ: Idaho Power
High Wind Warning	HWW	Issued for the expectation of sustained wind of 40 to 57 mph or higher for >2 hours within a 12-hour period, or for any non-convective gust to 58 mph within a 12-hour period. This includes issuance for structural/natural damage from said winds. Generally issued within 12 to 24 hours of a causative event.

Term	Acronym	Definition
High Wind Warning or Red Flag Warning	HWW RFW	Used in the WMP Data Template Workbook to indicate that a High Wind Warning and a Red Flag Warning were both in effect at a given time and location.
High Wind Warning Only	HWW Only	Used in the WMP Data Template Workbook to indicate that a High Wind Warning was the only wind status in effect at a given time and location.
High-risk species	–	Species of vegetation that (1) have a higher risk of either coming into contact with powerlines or causing an outage or ignition, or (2) are easily ignitable and within close proximity to potential arcing, sparks, and/or other utility equipment thermal failures. The status of species as "high-risk" must be a function of species-specific characteristics including growth rate, failure rates of limbs, trunk, and/or roots (as compared to other species), height at maturity, flammability, and vulnerability to disease or insects.
HWW Only/ OH circuit mile day	–	Used in the WMP Data Template Workbook to indicate that a High Wind Warning was the only wind status in effect at a given time and location. Sum of OH circuit miles of utility grid subject to a HWW each day within a given time period, calculated as the number of OH circuit miles under a HWW multiplied by the number of days those miles are under said HWW. For example, if 100 OH circuit miles are under a HWW for one day, and 10 of those miles are under the HWW for an additional day, then the total HWW OH circuit mile days would be 110.
Ignition	–	The process of starting combustion or catching fire. Ignition can be caused by an external heat source, such as a spark, pilot flame, or hot surface. The fuel and air must reach a certain temperature, known as the ignition temperature, for the combustion reaction to occur.
Ignition likelihood	–	The total anticipated number of ignitions resulting from utility-owned assets at each location in the electrical utility's service territory. This considers probabilistic weather conditions, type and age of equipment, and potential contact of vegetation and other objects with utility assets. This can be expressed for specific time periods (i.e., fire season, quarters or rates).
Ignition prevention findings	–	A violation of Commission Safety Rules which poses a risk of fire ignition identified by an HFRZ Ignition Prevention Inspection or safety patrol in an HFRZ that shall be subject to correction timeframes per OAR 860-024-0018(5).
Ignition prevention inspection	IPI	An inspection that identifies potential sources of electrical ignition on any utility pole, structure, duct, or conduit owned by either the Owner or an Occupant in a High Fire Risk Zone. The inspection may be combined with other safety or detailed inspections that may be required by rule, per OAR 860-024-0001(6) and 860-024-0018(3)(a).
Ignition probability	–	The relative possibility that an ignition will occur, quantified as a number between zero percent (impossibility) and 100 percent (certainty). The higher the probability of an event, the more certainty there is that the event will occur. (Often informally referred to as likelihood or chance).
Ignition risk	–	The total anticipated annualized impacts from ignitions at a specific location. This considers the likelihood that an ignition will occur, the likelihood the ignition will transition into a wildfire, and the potential consequences considering hazard intensity, exposure potential, and vulnerability-the wildfire will have on each community it reaches.
Incident Management Team	IMT	A rostered group of qualified personnel responsible for responding to incidents and emergencies.
Industry engagement	IE	A WMP initiative category to capture how utilities are participating in forums, sharing best practices or learnings, and conducting research and analysis related to emerging technologies / practices.
Initiative	–	Measure or activity, either proposed or in process, designed to reduce the consequences and/or probability of wildfire or PSPS.

Term	Acronym	Definition
Inspect / Correct	IC	A WMP initiative category to capture how utilities are implementing systematic field inspections and corrections to identify and mitigate wildfire ignition risks associated with utility infrastructure.
Institute of Electrical and Electronics Engineers	IEEE	A technical professional organization dedicated to advancing technology for the benefit of humanity.
Integrated Reporting of Wildland Fire Information	IRWIN	A system designed to facilitate sharing of data between various applications, providing an "end-to-end" fire reporting capability.
International Organization for Standardization	ISO	A non-governmental organization that develops and publishes international standards related to technology and manufacturing.
International Wildfire Risk Mitigation Consortium	IWRMC	A global collaborative utility effort to share data, information, and practices related to wildfire risk mitigation.
Investor-owned utility	IOU	An investor-owned entity acting as a public utility.
Light detection and ranging	LiDAR	A remote sensing method that uses light in the form of a pulsed laser to measure ranges to earth.
Line miles or Pole miles	–	The number of miles of transmission and/or distribution circuits in linear miles, regardless of the number of circuits. Primarily referenced in the context of planning circuit routes and vegetation management.
Local community	–	Any community of people living, or having rights or interests, in a distinct geographical area.
Local emergency management	–	Refers to city, county, and Tribal emergency management entities.
Medically vulnerable customers	–	A medically vulnerable customer is a person who is critically dependent on electrically powered equipment. Such customers may be particularly vulnerable due to advanced age or physical, sensory, intellectual or mental health that they may need life protecting devices and assistive technologies to support independent living and may possess a medical certificate as dictated under OAR 860-021-0410.
Mitigation	–	Activities to reduce the loss of life and property from natural and/or human-caused disasters by avoiding or lessening the impact of a disaster and providing value to the public by creating safer communities.
Momentary Average Interruption Frequency Index	MAIFI	The total number of customer momentary interruptions divided by the total number of customers served.
National Fire Danger Rating System	NFDRS	A fire assessment system used in the United States to provide a measure of the potential for wildfires based upon current and predicted conditions.
National Incident Management System	NIMS	A systematic, proactive approach to guide all levels of government, nongovernment organizations, and the private sector to work together to prevent, protect against, mitigate, respond to, and recover from the effects of incidents. NIMS provides stakeholders across the whole community with the shared vocabulary, systems, and processes to successfully deliver the capabilities described in the National Preparedness System. NIMS provides a consistent foundation for dealing with all incidents, ranging from daily occurrences to incidents requiring a coordinated federal response.
National Interagency Fire Center	NIFC	A facility in Boise, Idaho, where employees of multiple national and state agencies work together to ensure wildland fire personnel across the United States receive the support and information they need.
National Oceanic & Atmospheric Administration	NOAA	A science-based federal agency within the United States Department of Commerce with regulatory, operational, and information services responsibilities related to the earth's environment.
National Weather Service	NWS	A government agency that provides weather, water, and climate forecasts and warnings for the United States, its territories, adjacent waters, and ocean areas.
Near term wildfire risk	–	Elements of wildfire risk that are expected to fluctuate on a daily or weekly basis. Examples include temperature, humidity, and wind.

Term	Acronym	Definition
Non-high fire risk zone	Non-HFRZ	An area that is not designated as an HFRZ.
Non-routine vegetation management	–	Vegetation management removal or treatment programs conducted as non-cycle work, not generally associated with clearance compliance with OAR 860-024-0016.
Northwest Coordination Center	NWCC	The geographic coordination center for the Northwest Region, including Oregon and Washington. The center serves as the focal point for interagency resource coordination, logistics support, aviation support, and predictive services involved in wildfire fire management and suppression.
Occupant-owned	-	An entity that owns attachments on a utility pole or conduit with the pole owner's permission. These occupants are typically communications companies, cable providers, or other third-party attachers.
Operations and maintenance	O&M	A set of activities involved in managing and maintaining facilities.
Oregon Administrative Rule	OAR	Rules adopted by Oregon's agencies, boards, and commissions to implement and interpret relevant responsibilities their statutory authority.
Oregon Department of Emergency Management	OEM	A state agency that leads statewide efforts to develop and enhance preparedness, response, recovery, and mitigation capabilities.
Oregon Department of Forestry	ODF	A state agency that performs a variety of functions related to the management, regulation, and protection of public and private lands.
Oregon Department of Human Services	ODHS	A state agency that provides services to help Oregonians achieve well-being and independence.
Oregon Department of Transportation	ODOT	A state agency that provides a safe and reliable multimodal transportation system.
Oregon Joint Use Association	OJUA	An association comprised of pole owners and pole users representing electric utilities, communications companies, and government agencies.
Oregon Public Utility Commission	OPUC	The agency responsible for rate regulation of Oregon's investor-owned electric utilities, natural gas utilities, telephone service providers, as well as select water companies. The PUC enforces electric and natural gas safety standards, handles utility-related dispute resolution, and participates in the Oregon Emergency Response System.
Other risk category	–	Risk category used by some electric utilities to define an area that is not identified as a HFRZ; however, the utility has deemed the area with some fire risk beyond the non-HFRZ classification. These areas may signify areas in which the utility feels it is necessary to provide some wildfire mitigation work.
Overhead	OH	Typically used to differentiate overhead electrical circuits from underground circuits.
Patrol inspection	–	An Operator of electric supply facilities or an Operator of communication facilities must: (a) Construct, operate, and maintain its facilities in compliance with the Commission Safety Rules; and (b) Conduct detailed inspections of its overhead facilities to identify violations of the Commission Safety Rules. Per OAR 860-024-0111(1).
Performance metric	–	A quantifiable measurement that is used by an electrical corporation to indicate the extent to which its WMP is driving performance outcomes.
Pole	–	Any pole that carries distribution lines and that is owned or controlled by a public utility, telecommunications utility, or consumer-owned utility.
Pole miles	–	See Line miles
Preparedness	–	A continuous cycle of planning, organizing, training, equipping, exercising, evaluating, and taking corrective action in an effort to ensure effective coordination during incident response. Within the NIMS, preparedness focuses on planning, procedures and protocols, training and exercises, personnel qualification and certification, and equipment certification.

Term	Acronym	Definition
Priority A findings	–	A violation of the Commission Safety Rules that poses an imminent danger to life or property must be repaired, disconnected, or isolated by the Operator immediately after discovery per OAR 860-024-0012(1). Within Priority A findings, if subclassifications exist to prompt immediate response, (such as coding the finding as an I priority), the utility must report these conditions separately. Each utility may utilize its own methods to identify findings that meet this category.
Priority B findings	–	The Operator must correct violations of Commission Safety Rules no later than two years after discovery. Two Year Correction, Priority B, OAR 860-024-0012(2). Each utility may utilize its own methods to identify findings that meet this category.
Priority C findings	–	An Operator may elect to defer correction of violations of the Commission Safety Rules that pose little or no foreseeable risk of danger to life or property to correction during the next major work activity. (a) In no event shall a deferral under this section extend for more than 10 years after discovery. Deferral, Priority C, OAR 860-024-0012(3)(a). Each utility may utilize its own methods to identify findings that meet this category.
Priority I findings	–	A corrective finding which requires immediate response for Imminent Conditions. Utilities will remain on site until the correction is completed. If this method is used, this finding is reported as a subtype of Priority A findings, i.e., Priority A-I.
Property	–	Private and public property, buildings and structures, infrastructure, and other items of value that may be destroyed by wildfire, including both third-party property and utility assets.
Protective equipment and device settings	–	The electrical corporation's procedures for adjusting the sensitivity of grid elements to reduce wildfire risk, other than automatic reclosers (such as circuit breakers, switches, etc.) For example, "sensitive settings".
PSPS event	–	A proactive de-energization of a portion of a Public Utility's electrical network, based on the forecasting of and measurement of extreme wildfire weather conditions. The period from notification of the first public safety partner of a planned public safety PSPS to re-energization of the final customer.
PSPS likelihood	–	The likelihood of a PSPS being required by a utility given a probabilistic set of environmental conditions.
PSPS/emergency preparedness	–	A WMP initiative category to capture how utilities are preparing for and executing emergency operations to mitigate wildfire risk and maintain public safety, including through Public Safety Power Shutoff (PSPS) events and broader emergency readiness strategies.
Public information officer	PIO	The individual responsible for providing information to the public related to an organization or incident.
Public safety partner	PSP	Emergency Support Function-12, Local Emergency Management, and Oregon Department of Human Services (ODHS). Per OAR 860-300-0010(7).
Public safety power shutoff	PSPS	Proactive de-energization of a portion of a Public Utility's electrical network, based on the forecasting of and measurement of extreme wildfire weather conditions.
PUC staff	–	Regulatory employees of the State Public Utility Commission, excluding commissioners and Administrative Law Judges. Staff serves as an advocate for the public interest and participates in proceedings.
Quality assurance/quality control	QA/QC	The combination of proactive and reactive processes designed to prevent and correct defects.
Red Flag Warning	RFW	Issued by the NWS for conditions conducive to rapid or explosive growth of any wildfire that develops. Normally issued within 24 hours of expected occurrence. Red Flag Warnings are not issued for the probability of wildfire to start.
Regional disaster preparedness organization	RDPO	A partnership of government agencies, non-governmental organizations, and private-sector stakeholders in the Portland Metropolitan Region collaborating to increase disaster resilience.

Term	Acronym	Definition
Remote automatic weather stations	RAWS	Self-contained, portable, and permanent, solar powered weather stations that provide timely local weather data used primarily in fire management. These stations monitor the weather and provide weather data that assists land management agencies with a variety of projects such as monitoring air quality, rating fire danger, and providing information for research applications.
Reportable ignition	–	Per OAR 860-024-0050(4): Except as provided in section (6) of this rule, every reporting operator must, in addition to the notice given in sections (2) and (3) of this rule for an incident described in sections (2) and (3), report in writing to the Commission within 20 days of knowledge of the occurrence using Form 221 (FM221) available on the Commission's website. In the case of injuries to employees, a copy of the incident report form, that is submitted to Oregon OSHA, Department of Consumer and Business Services, for reporting incident injuries, will normally suffice for a written report.
Reporting period	–	"Reporting period" is defined as the actual period of time the data is relevant. For example, the 2030 WMP filing should include the reporting period year of 2029.
Reporting year risk designation	–	This attribute is used by the reporting utility to identify distinction levels of Wildfire Risk for the given reporting period year. (For example, Tier 1 or Tier 2, or HFRZ and Areas of Interest.) HFRZ areas and relevant sub-categories, if applicable, as defined by the utility.
RFW only/OH circuit mile day	–	Used in the WMP Data Template Workbook to indicate that a Red Flag Warning was the only wind status in effect at a given time and location. Sum of OH circuit miles of utility grid subject to RFW each day within a given time period, calculated as the number of OH circuit miles under RFW multiplied by the number of days those miles are under said RFW. For example, if 100 OH circuit miles are under RFW for one day, and 10 of those miles are under RFW for an additional day, then the total RFW OH circuit mile days would be 110.
Right-of-way	ROW	The legal right, established by usage or grant, to pass along a specific route through grounds or property belonging to another.
Risk	–	A measure of the anticipated adverse effects from a hazard considering the consequences and frequency of the hazard occurring.
Risk component	–	A part of an electric corporation's risk analysis framework used to determine overall utility risk.
Risk event	–	An event with probability of ignition, such as wire down, contact with objects, line slap, event with evidence of heat generation, or other event that causes sparking or has the potential to cause ignition. The following all qualify as risk events: ignitions, outages not caused by vegetation, outages caused by vegetation, wire-down events, faults, and other events with potential to cause ignition.
Risk map	–	A collection of data sufficient to represent the spatial distribution (e.g., across a geography) of a given type of risk (i.e., the probability of an event and its consequence) and the spatial representation thereof.
Risk mapping algorithm	–	A risk mapping algorithm is a methodology for calculating risk levels from data inputs across a spatial display (i.e., map of geography).
Risk methodology & assessment	RMA	A WMP initiative category to capture how utilities are developing and using tools and processes to assess the risk of wildfire and PSPS across their service territory and/or other facilities.
Risk spend efficiency	RSE	Used by utilities to quantify and compare cost effectiveness of mitigation measures based on the ratio of the risk reduction to the mitigation cost. It is similar to a cost/benefit analysis using risk points and is calculated as Risk Reduction x Lifetime of Benefit/Total Cost.
Routine non-wildfire vegetation management	–	Vegetation management removal or treatment programs conducted as cycle work, generally associated with clearance compliance with OAR 860-024-0016.

Term	Acronym	Definition
Routine wildfire vegetation management	–	Vegetation management removal or treatment programs conducted programmatically that are intended to mitigate vegetation risks that could result in wildfire and are generally in excess of that required for compliance with OAR 860-024-0016.
Rural	–	Per IEEE 1782-2024 3.3 System characterization: Utility circuits (and systems) generally fall into one of the three categories below, which are defined by customer density. Rural (less than 31 customers per circuit kilometer or 50 customers per circuit mile).
Sensitive settings **Enhanced safety settings** **or** **Enhanced protection settings** **or** **Enhanced powerline safety settings**	ESS EPS EPSS	Advanced safety settings implemented by electric utilities on electric utility powerlines to reduce wildfire. While electric utility programs are similar, this does not imply identical enhanced protection settings for the devices performing these functions. Enhanced Safety Settings (ESS): PacifiCorp. Enhance Protection Settings (EPS): Idaho Power. Enhanced Powerline Safety Settings (EPSS): Portland General Electric.
Situation awareness & forecasting	SAF	A WMP initiative category to capture how utilities are leveraging real-time data, environmental intelligence, and predictive analytics to monitor and respond to wildfire conditions in order to reduce ignition risk and enhance operational readiness.
Slash	–	Branches or limbs less than four inches in diameter, and bark and split products debris left on the ground as a result of utility vegetation management.
Span	–	The space between adjacent supporting poles or structures on a circuit consisting of electric lines and equipment. "Span level" refers to asset-scale granularity.
Subject matter expert	SME	A professional who has advanced knowledge in a specific field.
Suburban	–	Per IEEE 1782-2024 3.3 System characterization: Utility circuits (and systems) generally fall into one of the three categories below, which are defined by customer density. Suburban (31 to 93 customers per circuit kilometer or 50 to 150 customers per circuit mile).
Supervisory Control and Data Acquisition	SCADA	A system of hardware and software that enables an organization to control and monitor equipment, systems, and processes.
System Average Interruption Duration Index	SAIDI	The total number of minutes (or hours) of interruption the average customer experiences.
System Average Interruption Frequency Index	SAIFI	How often the average customer experiences an interruption.
Tabletop exercise	–	An activity in which key personnel, assigned emergency management roles and responsibilities, are gathered to discuss, in a non-threatening environment, various simulated emergency situations.
Target	–	A forward-looking, quantifiable measurement of work to which an electrical corporation commits to in its WMP. Electrical corporations will show progress toward completing targets in subsequent reports.
Transmission & distribution	T&D	Designation typically used to identify equipment, systems, and other assets used to transmit or distribute electricity.
Transmission line	–	Refers to all lines at or above 50 kV unless otherwise noted. Per OAR 860-024-0018 (3)(b).
Tree attachment	–	Utility supply conductors shall not be attached to trees and should only be attached to poles and structures designed to meet the strength and loading requirements of the National Electrical Safety Code. This section does not apply to customer-supplied equipment at the point of delivery. Compliance with this section must be achieved prior to December 31, 2027. OAR 860-240-0018(2).

Term	Acronym	Definition
Tree inspection non-routine vegetation management	–	Vegetation management inspection programs conducted as non-cycle work, not generally associated with clearance compliance with OAR 860-024-0016.
Tree inspection routine vegetation management	–	Vegetation management inspection programs conducted as cycle work, generally associated with clearance compliance with OAR 860-024-0016.
Tribes / Tribal Nations	–	This term is used collectively to describe federally recognized Tribes within the Pacific Northwest.
United States Forest Service	USFS	An agency within the United States Department of Agriculture that administers the nation's national forests and grasslands.
Urban	–	Per IEEE 1782-2024 3.3 System characterization: Utility circuits (and systems) generally fall into one of the three categories below, which are defined by customer density. Urban (more than 93 customers per circuit kilometer or 150 customers per circuit mile).
Utility-identified critical facilities	UICF	Facilities the Public Utility identifies that, because of their function or importance, have the potential to threaten life safety or disrupt essential socioeconomic activities if their services are interrupted. Communications facilities and infrastructure are to be considered Critical Facilities.
Utility-related ignition	–	See Reportable Ignition.
Vegetation management	VM	Trimming and removal of trees and other vegetation at risk of contact with electric equipment. OAR 860-024-0016 and OAR 860-024-0017. Also, a WMP initiative category to capture how utilities are implementing vegetation management programs to reduce ignition risk.
Vulnerability	–	The propensity or predisposition of a community to be adversely affected by a hazard, including the characteristics of a person, group, or service and their situation that influences their capacity to anticipate, cope with, resist, and recover from the adverse effects of a hazard.
Weather Research & Forecasting	WRF	A state-of-the-art mesoscale numerical weather prediction system designed for both atmospheric research and operational forecasting applications.
Wildfire hazard	–	The combination of ignition risk and fire spread resulting in a wildfire consequence. Each utility may provide additional explanation to inform stakeholders of how this designation is quantified within their WMPs.
Wildfire mitigation plan	WMP	Same as a "wildfire protection plan" and refers to the document filed with the Commission relating to an electric utility's risk-based plan designed to protect public safety, reduce the risk of utility facilities causing wildfires, reduce risk to utility customers, and promote electric system resilience to wildfire damage. Per OAR 860-300-0010(11).
Wildfire mitigation strategy	–	Overview of the key mitigation initiatives at enterprise level and component level across the electrical corporation's service territory, including interim strategies where long-term mitigation initiatives have long implementation timelines. This includes a description of the enterprise-level monitoring and evaluation strategy for assessing overall effectiveness of the WMP.
Wildfire mitigation strategy development	WMSD	A WMP initiative category to capture how utilities are developing and using processes for deciding on a portfolio of mitigation initiatives. This initiative includes WMP development, reporting, and compliance related activities.
Wildfire risk	–	The likelihood of a wildfire occurring and the potential impact a wildfire could have.
Wildfire risk zone	WRZ	See High Fire Risk Zone
Wildland-urban interface	WUI	The line, area, or zone where structures and other human development meet or intermingle with undeveloped wildland or vegetation fuels (National Wildfire Coordinating Group). Enforcement agencies also designate the WUI as the area at significant risk from wildfires, established pursuant to Title 24, Part 2, Chapter 7 A.

Term	Acronym	Definition
Wire down	–	Instance where an electric transmission or distribution conductor is broken and falls from its intended position to rest on the ground or a foreign object.
Work order	WO	A prescription for asset or vegetation management activities resulting from asset or vegetation management inspection findings.
Zone of protection	ZOP	The area or segment of an electrical power system that is protected by a particular protective device or protection system.

Appendix B – WMP Regulatory Compliance Checklist

The WMP Regulatory Compliance Index is to allow stakeholders and Staff to quickly identify where current information is located for each WMP requirement articulated in the Oregon Administrative Rules.

Table B-1: Compliance Checklist

(OAR)/Order Citation	OAR Description	WMP Section(s)
OAR 860-300-0020 (1)(a)(A)(B)	Identified areas that are subject to a heightened risk of wildfire, including determinations for such conclusions, and are: (A) Within the service territory of the Public Utility, and; (B) Outside the service territory of the Public Utility but within the Public Utility's right-of-way for generation and transmission assets.	3, 4.2.1, Appendix D
OAR 860-300-0020 (1)(b)	Identified means of mitigating wildfire risk that reflects a reasonable balancing of mitigation costs with the resulting reduction of wildfire risk.	5.2.1, 5.2.2
OAR 860-300-0020 (1)(c)	Identified preventative actions and programs that the utility will carry out to minimize the risk of the utility's facilities causing wildfire.	6.2, 7.2, 8.2
OAR 860-300-0020 (1)(d)	Discussion of the outreach efforts to regional, state, and local entities, including municipalities, regarding a protocol for the de-energization of power lines and adjusting power system operations to mitigate wildfires, promote the safety of the public and first responders, and preserve health and communication infrastructure.	11.2, 12.1, 12.2, 12.2.3
OAR 860-300-0020 (1)(e)	Identified protocol for the de-energization of power lines and adjusting of power system operation to mitigate wildfires, promote the safety of the public and first responders, and preserve health and communication infrastructure, including a PSPS communication strategy consistent with OAR 860-300-040 through 860-300-0050.	12.1, 12.2.1, 12.2.2, 12.2.3, 12.2.5
OAR 860-300-0020 (1)(f)	Identification of the community outreach and public awareness efforts that the utility will use before, during, and after a wildfire season, consistent with OAR 860-300-040 through OAR 860-300-050.	13
OAR 860-300-0020 (1)(g)	Description of the procedures, standards, and timeframes the Public Utility will use to inspect utility infrastructure in areas it has identified as heightened risk of wildfire, consistent with OAR 860-024-0018.	7.2, 7.3
OAR 860-300-0020 (1)(h)	Description of the procedures, standards, and timeframes that the utility will use to carry out vegetation management in areas it has identified as heightened risk of wildfire, consistent with OAR 860-024-0018.	8.2
OAR 860-300-0020 (1)(i)	Identification of the development, implementation, and administrative costs for the Plan, which includes discussion of risk-based cost and benefit analysis as well as considerations of technologies that offer co-benefits to the utility's system.	2.2, 2.3, Appendix E
OAR 860-300-0020 (1)(j)	Description of participation in national and international forums, including workshops identified in section 2, chapter 592, Oregon Law 2021, as well as research and analysis the utility has undertaken to maintain expertise in leading-edge technologies and operational practices, including how such technologies and operational practices have been used to develop and implement cost-effective wildfire mitigation solutions.	14

(OAR)/Order Citation	OAR Description	WMP Section(s)
OAR 860-300-0020 (1)(k)	Description of ignition inspection programs, as described in Division 24 of these rules, including how the utility will determine and instruct its inspectors to determine conditions that could pose an ignition risk on its own equipment and pole attachments.	7.2.3, 7.2.4, 7.2.13
OAR 860-300-0030 (1)	The Public Utility must include in its Wildfire Mitigation Plan risk analysis that describes wildfire risk within the Public Utility's service territory and outside the service territory of the Public Utility but within the Public Utility's right of way for generation and transmission assets. The risk analysis must include, at a minimum: (a) Defined categories of overall wildfire risk and an adequate discussion of how the Public Utility categorizes wildfire risk. Categories of risk must include, at a minimum: (A) Baseline wildfire risk, which include elements of wildfire risk that are expected to remain fixed for multiple years. Examples include topography, vegetation, utility equipment in place, and climate; (B) Seasonal wildfire risk, which include elements of wildfire risk that are expected to remain fixed for multiple months but may be dynamic throughout the year or from year to year; Examples include cumulative precipitation, seasonal weather conditions, current drought status, and fuel moisture content; (C) Risks to residential areas served by the Public Utility; and (D) Risks to substation or powerline owned by the Public Utility. (b) a narrative description of how the Public Utility determines areas of heightened risk of wildfire using the most updated data it has available from reputable sources. (c) a narrative description of all data sources the Public Utility uses to model topographical and meteorological components of its wildfire risk as well as any wildfire risk related to the Public Utility's equipment. (A) The Public Utility must make clear the frequency with which each source of data is updated; and (B) The Public Utility must make clear how it plans to keep its data sources as up to date as is practicable. (d) The Public Utility's risk analysis must include a narrative description of how the Public Utility's wildfire risk models are used to make decisions concerning the following items: (A) Public Safety Power Shutoffs (B) Vegetation Management; (C) System Hardening; (D) Investment decisions; and (E) Operational decisions. (e) For updated Wildfire Mitigation Plans, the Public Utility must include a narrative description of any changes to its baseline wildfire risk that were made relative to the previous plan submitted by the utility, including the Public Utility's response to changes in baseline wildfire risk, seasonal wildfire risk, and Near-term Wildfire Risk.	4, 5.2, Appendix H
OAR 860-300-0030 (2)	To the extent practicable, the Public Utility must confer with other state agencies when evaluating the risk analysis included in the Public Utility's Wildfire Mitigation Plan.	4.8

(OAR)/Order Citation	OAR Description	WMP Section(s)
860-300-0040 (1)	The Public Utility must include in its Wildfire Mitigation Plan a Wildfire Mitigation Plan Engagement Strategy. The Wildfire Mitigation Plan Engagement Strategy will describe the utility's efforts to engage and collaborate with Public Safety partners and Local Communities impacted by the Wildfire Mitigation Plan in the preparation of the Wildfire Mitigation Plan and identification of related investments and activities. The Engagement Strategy must include, at a minimum: (a) Accessible forums for engagement and collaboration with Public Safety Partners, Local Communities, and customers in advance of filing the Wildfire Mitigation Plan. The Public Utility should provide, at minimum: (A) One public information and input session hosted in each county or group of adjacent counties within reasonable geographic proximity and streamed virtually with access and functional needs considerations; and (B) One opportunity for engagement strategy participants to submit follow-up comments to the public information and input session. (b) A description of how the Public Utility designed the Wildfire Mitigation Plan Engagement Strategy to be inclusive and accessible, including consideration of multiple languages and outreach to access and functional needs populations as identified with local Public Safety Partners.	13
860-300-0040 (2)	(2) The Public Utility must include a plan for conducting community outreach and public awareness efforts in its Wildfire Mitigation Plan. It must be developed in coordination with Public Safety Partners and informed by local needs and best practices to educate and inform communities inclusively about wildfire risk and preparation activities. (a) The community outreach and public awareness efforts will include plans to disseminate informational materials and/or conduct trainings that cover: (A) Description of PSPS including why one would need to be executed, considerations determining why one is required, and what to expect before, during, and after a PSPS; (B) A description of the Public Utility's wildfire mitigation strategy; (C) Information on emergency kits/plans/checklists; (D) Public Utility contact and website information. (b) In formulating community outreach and public awareness efforts, the Wildfire Mitigation Plan will also include descriptions of: (A) Media platforms and other communication tools that will be used to disseminate information to the public; (B) Frequency of outreach to inform the public; (C) Equity considerations in publication and accessibility, including, but not limited to: (i) Multiple languages prevalent to the area; (ii) Multiple media platforms to ensure access to all members of a Local Community.	12, 13
860-300-0040 (3)	The Public Utility must include in its Wildfire Mitigation Plan a description of metrics used to track and report on whether its community outreach and public awareness efforts are effectively and equitably reaching Local Communities across the Public Utility's service area.	13.2.5, 13.4.1

(OAR)/Order Citation	OAR Description	WMP Section(s)
860-300-0040 (4)	The Public Utility must include a Public Safety Partner Coordination Strategy in its Wildfire Mitigation Plan. The Coordination Strategy will describe how the Public Utility will coordinate with Public Safety Partners before, during, and after the fire season and should be additive to minimum requirements specified in relevant Public Safety Power Shut Off requirements described in OAR 860-300-0050. The Coordination Strategy should include, at a minimum: (a) Meeting frequency and location determined in collaboration with Public Safety Partners; (b) Tabletop Exercise plan that includes topics and opportunities to participate; (c) After action reporting plan for lessons learned in alignment with Public Safety Partner after action reporting timeline and processes.	12.2.3, 12.2.7, 13.2.4, 13.4.1, 13.5.1
860-300-0050 (1)	When a Public Utility determines that a PSPS is likely to occur, it must deliver notification of the PSPS to its Public Safety Partners, operators of utility-identified critical facilities, and adjacent local Public Safety Partners.	12.2
860-300-0050 (2)	When a Public Utility determines that a PSPS is likely to occur, the Public Utility must provide advance notice of the PSPS to customers via a PSPS web-based interface on the Public Utility's website and other media platforms, and may communicate PSPS information directly with customers consistent with this rule.	12.2
860-300-0050 (3)	To the extent possible, the Public Utility will adhere to the following minimum notification prioritization and timeline in advance of a PSPS: (a) 48-72 hours in advance of anticipated de-energization, priority notification to Public Safety Partners, operators of utility-identified critical facilities, and adjacent local Public Safety Partners; (b) 24-48 hours in advance of anticipated de-energization, when safe: secondary notification to all other affected customers; and (c) 1-4 hours in advance of anticipated de-energization, if possible: notification to all affected customers.	12.2.5
860-300-0060 (1)-(3)	(1) The Public Utility will create a web-based interface that includes real-time, dynamic information on location, de-energization duration estimates, and re-energization estimates. The web-based interface will be hosted on the Public Utility's website and must be accessible during a PSPS event. The Public Utility will complete the web-based interface before March 31, 2024. (2) The Public Utility will make its considerations when evaluating the likelihood of a PSPS publicly available on its website. These considerations include, but are not limited to: strong wind events, other current weather conditions, primary triggers in high risk zones that could cause a fire, and any other elements that define an extreme fire hazard evaluated by the Public Utility. (3) The Public Utility will ensure that its website has the bandwidth capable of handling web traffic surges in the event of a Public Safety Power Shutoff.	12.2.5, Appendix F
860-300-0060 (4)	The Public Utility will work to provide real-time geographic information pertaining to PSPS outages compatible with Public Safety Partner GIS platforms.	12.2.4, 12.2.5, Appendix F

(OAR)/Order Citation	OAR Description	WMP Section(s)
860-300-0060	(1) The Public Utility is required to file annual reports on de-energization lessons learned, providing a narrative description of all PSPS events which occurred during the fire season. Reports must be filed no later than December 31st of each year. (2) Non-confidential versions of the reports required under this section must also be made available on the Public Utility's website.	12.2.8, Appendix F
IWRMC Maturity Model Results	N/A	14.2, Appendix G
24-230-2	Identify which risk modeling processes are informed solely by accepted data models and which are adjusted by subject matter experts. For processes adjusted by subject matter experts describe how they are adjusted. Provide demonstration of how subject matter expert input has informed the model by comparing and contrasting the output of those processes.	4.2.3, 9, Appendix C
24-230-3	Provide information about the development of composite risk scores which outlines when any addition, versus multiplication, of risk score components is best used to develop a single metric. In the case of 5C9 circuit segment (or any other circuit having negligible wind impacts), please explain how the risk of wind is being appropriately accounted for in the risk ranking of circuits. Also, please explain how the length of circuit exposure is factored into the risk ranking of circuits.	4, Appendix C
24-230-4	Detail if and how ignition risk drivers, including equipment failure and contact from objects, are further investigated by the Company. Describe how any additional investigation or analysis is used to inform mitigation plan selection.	4.2.3, 4.3, 4.4, Appendix C
24-230-5	Provide the effect of short-term fuel (such as related to recently burned areas on the seasonal, short-term, and long-term risks. Clarify how these effects (such as the absence or existence of fuel for a short period) inform selection of mitigations, whether operational actions (such as Public Safety Power Shutoff) or long-term actions (such as reconductoring). Explain how later year work will be executed since the WMP describes the need for Plan modification but does not clearly outline what the output is.	
24-230-6	Provide a state-wide listing of circuit risks (or circuit segments or circuits zones of protections), cumulatively, and demonstrate the risk reduction intended after the mitigations outlined have been completed (Table 5 for Top 20 and Appendix D updated).	4.6, Appendix C, Appendix E.
24-230-9	Explain how the Company determines who qualifies as a public safety partner. Describe how Pacific Power manages contact lists to ensure the ability to make contact, including primary and secondary contact methods. As the Public Safety Partner Portal evolves, ensure discussions with Public Safety Partners includes how the portal helps to make such contact more reliable and effective.	11.2.3, Appendix C
24-230-10	Provide information regarding its use of Community Based Organizations to provide additional information relevant to vulnerable populations beyond those in its own system, as well as leveraging Community Based Organizations to communicate opportunities for customers to self-identify for advance notice of Public Safety Power Shutoffs.	13.2.3, Appendix C
24-230-14	Provide information regarding its use of Community Based Organizations to provide additional information relevant to vulnerable populations beyond those in its own system, as well as leveraging Community Based Organizations to communicate opportunities for customers to self-identify for advance notice of Public Safety Power Shutoffs.	13.2.3, Appendix C

(OAR)/Order Citation	OAR Description	WMP Section(s)
24-230-15	Pacific Power should continue to develop analytics to support optimal inspection and correction actions for designated risk areas or identified assets that may result in fire risk (including equipment specifics or circuit segments). Data should support decisions on selection of the various inspection types (such as survey/ patrol inspections, detail inspections, LiDAR, or drone-assisted visual surveys), the promptness or timing of corrections, as well as the quality assurance done to validate the program effectiveness. The Company should provide information about the development of these analyses and demonstrate how they maintain and operate the system.	5.2, 7.2.2, 7.2.6, 7.2.8, Appendix C
24-230-16	Staff recommends that vegetation actions and their timing be outlined and explain what led to that approach with any explanation for validating those tactics. As underlying data analytics are developed which further validate or modify the elements of the vegetation management program, provide updates, and reconcile against historic program actions.	Appendix C
24-230-17	Staff recommends that Pacific Power engage as outlined in Joint Recommendations K and L to quantify segment or zone of protection level risk for its assets and utilize these results to evolve its Table 5, Top 20 circuit risk; with this approach, develop a system-wide view of the segment/ zone of protection/ circuit risk as an input into current and future prioritization efforts.	4.2.3, 5.2.1.3, Appendix C
24-230-H	All utilities should provide industry engagement information though a standard reporting template which outlines participation in industry forums & expected information to be shared in such forums, including results from pilots prior to widescale adoption, and pilot valuation methods.	14.3, Appendix C
24-230-I	All utilities should provide pilot technology information though a standard reporting template which includes: details of pilot projects, goals for the pilot, status of the pilot (planning, development, implementation), the current penetration and saturation across the system, envisioned application, milestones for determining usefulness of pilot, expected capital costs, expected O&M costs, expected timeframe for pilot implementation and lifespan. (Phase 2). At minimum this level of detail is needed for the following pilot technologies: o Communicating Fault Circuit Indicators (CFCI); o Fuel load reduction projects; o Wildfire detection cameras; o Early fault detection; o Drone inspection pilot; o Distribution fault anticipation o Covered conductor or spacer cable; and o Infrared patrols.	14.6, Appendix C

(OAR)/Order Citation	OAR Description	WMP Section(s)
24-230-J	Staff foresees the working group allowing participation the public, including Public Safety Partners, wildfire experts, and impacted communities. Staff has chosen not to include more detailed information on Work Group meeting schedules or plans at this time and intends these would be developed in consultation with the Utilities and stakeholders if the Joint Recommendations are approved. All utility risk maps should originate from a foundational utility risk map which considers the logical set of variables. Short range outlooks, as well as midrange outlooks may inform the foundational map. After developing the foundational map, a utility risk map can consider and overlay a variety of conditions, such as response times and locale as well as locations where mitigations have taken place or recent fuel has been removed. Any adjustments made to the foundational risk maps or the outlooks, should be explicitly identified and recorded as to what variable caused the change and what new information supported this change.	4.2.1, 4.2.2, 4.7, 4.8, Appendix C
24-230-K	All utilities should collaborate to calibrate their risk modeling methods and identify the underlying assumptions in determining line segment risk. Some of the assumptions might include fire spread modeling periods, probability being considered, fire weather history, and inclusion of response likelihood. This work approach would result in fundamental agreement on a specific modeling method for which each utility would produce its current asset register, as well as GIS and tabular data identifying the risk scoring for each asset.	Appendix C, Appendix H
24-230-L	The WMP working group should adopt Risk Mitigation and Cost Valuation (RSE) as its part of its area of focus. This Staff led working group should propose risk quantification guidelines to the Commission for implementation in the 2026 WMPs. RSE should reflect granular data for electric assets which quantify risk that is derivative of operational data (include outage and device state information), observational data (inspections), temporal data (snapshots in time related to peripheral systems) and should fully comprise all the facilities that are part of the utility's HFRZ. Consistency of terminology, data sources and their confidence, and expected calculation processes should be prepared by the utilities but performed consistent with guidance by the PUC. In addition, RSE needs to recognize the manner in which "risk" is quantified by the utility, and generally result in an agreed-upon method for the quantification and the way that the reduced risk will be measured. This could leverage PacifiCorp's "composite risk" or one of the other IOU's risk quantification methods.	Appendix C, Appendix H
24-230-M	All utilities should regularly participate in a cross-utility effort, via working group or other format, to share experience, learnings, and industry best practices, surrounding system reliability. At minimum, this effort should include discussion of sophisticated protection control equipment and its application to sensitive settings, consideration of impact to reliability, in particular the response during elevated risk season with repeated outages to customers when "self healing" is not in place (resulting in them experiencing nuisance trips). This group should not only consider impacts to system level reliability but consider impacts of momentary interruptions and longer sustained outages to remote customers, particularly those which may be less able to sustain during poorer reliability periods.	Appendix C

(OAR)/Order Citation	OAR Description	WMP Section(s)
24-230-N	All utilities should regularly participate in a cross-utility effort, via working group or other format, to share experience, learnings, and industry best practices, for identifying and coordinating with Public Safety Partners, building on the ground relationships and communication, developing livestream/recorded multi-language community meetings, and coordinate with local communities to participate in safety fairs.	13
24-230-O	All utilities should collaborate to develop consistent content (and should conform to generally consistent language) to inform customers, communities and public safety partners about operational protocols which can impact their power reliability and power system operations. As a complement to these approaches, utilities should perform analysis regarding the location-specific impacts to reliability, including the increase in customer complaints internally as well as those recorded by the OPUC consumer services division, and develop methods to quickly react to heightened operations impacting customers' reliability. Customers and communities may benefit from awareness of other outage causes (beyond weather), which impact reliability and during "sensitive settings" or "fire season" period or which could result in unusual reliability.	12
24-230-P	All utilities should collaborate to develop a "template" for reporting PSPS details during the execution of a PSPS, and Staff would appreciate participating in these sorts of collaborative development efforts.	12.5
25-233-2501	Pacific Power should outline how it plans to incorporate future land use and climate changes in order to demonstrate the Company's long-term plans align with the future state for those areas. Since such work is required in California, Staff believes there may be existing processes or approaches taken that could be explored by the Company and shared within the WMP.	4.7, 4.8, Appendix C
25-233-2502	Pacific Power should provide wildfire risk scores (both RAVE and RAIL) for its circuit segments or zones of protection calculations for wind-driven and terrain/fuel driven risk awareness.	4, Appendix C
25-233-ALL_2504	Provide an explanation for current and future approaches for establishing associations between legacy outage data and ignition risk drivers. This should include providing any lookup tables or graphic and tabular depictions that clarify how the relationships are established until more direct relationships between outage management system data and the Risk and Ignition Event Categorization in the WMP Data Template. To the extent that the utility uses comments or other sources to identify "wire down events" or other values that better report on wildfire risk events, it should clarify the process used.	**4.3, Appendix C**
25-233-ALL_2505	Greater analysis and exploration of outage causes and their correlation to ignition risk drivers should be quantified, ideally at a fault rate per unit length in the conductors/zones of protection. Each Company should participate in a process designed to explore correlations between ignition risk drivers and how they vary.	Appendix C, Appendix H

(OAR)/Order Citation	OAR Description	WMP Section(s)
25-233-ALL_2506	Work with Staff to determine how best to produce information demonstrating the areas of utility risk that can be used by regulators, customers and PSPs. This should include tabularly, circuit or circuit segments including, at minimum, the following information: (1) Circuit ID by a circuit segment, (2) percent within Utility Wildfire Risk Area, (3) circuit or circuit segment risk scores (4) ignition risk drivers resulting in score (with explanation of how the score was calculated), (4) the operating area, (5) the town or general location (6) HFRZ named area, (7) total overhead circuit length, (8) total underground circuit length and (9) the status of any project (such as under evaluation, ongoing, completed, or none).	6.4, Appendix C, Appendix E, Appendix H
25-233-ALL_2507	Provide in the 2026 WMP, a table of all current and planned mitigation work investments. Include the following details: (1) Circuit ID or circuit segment, (2) Risk Score prior to and (3) after improvement, (4) RSE Score, (5) the historic ignition driving risk driver (historical outage records, weather or landscape changes), (6) Capital investment Cost, (7) Expense (O&M) Cost, (8) target date for engineering, (9) target date for construction, (10) target date for completion, (11) Improvement Units (miles of conductor changes, or equipment installed), and (12) comments on any year over year changes to the above.	Appendix C, Appendix E
25-233-2503	Pacific Power should justify its use of vendor project management to reduce costs to deliver covered conductor projects. It should also provide details comparing its forecast construction costs by cost elements, including project management costs. It should compare its forecast cost elements against historic cost elements for covered conductor construction(distinguishing between traditional crossarm and spacer cable projects).	Appendix C
25-233-2508	Include grant details in the WMPs for any new, or updated, approved grants for current and future receipts. Details shall include the project it benefitted, the awarding agency(s), amount awarded, timeline, and funding status. The Company should demonstrate how each grant impacts project costs and customer rates, as well as how the Company will manage reimbursement, and any adjustments due to funding delays.	2.2.1, Appendix C
25-233-ALL_2509	Provide additional information when there are changes to work currently queued up for implementation. If a project is delayed, explain whether the delay will be resolved within the year or if delays are expected to continue into future years. For delays expected to continue into future years, note how the delay may affect risk reduction for the system.	2.3.1, Appendix C
25-233-ALL_2510	In the Multi-year and Update WMP Plans, track the historical and forecasted annual equipment upgrades (such as number of CFCI's installed, miles of spacer cable, miles of covered conductor (not spacer cable), miles of underground conductor, cameras installed, pole replacements, poles wrapped, etc.) including a comparison of projected and actual unit completion amounts by year.	2.3, Appendix C
25-233-ALL_2511	Include a list of any WMP-relevant surveys conducted during the year. Details should include the languages that the survey was offered in, the total responses, and an outline of each question asked and what the available responses were. Outline any lessons learned or program shifts as a result of the survey responses.	13, Appendix C, Appendix F

(OAR)/Order Citation	OAR Description	WMP Section(s)
25-233-ALL_2512	In the 2026 WMP, describe the utility's capability for real-time communication during a PSPS event to customers and public safety partners, in the appropriate languages, the following information: what the current PSPS forecast is, where the PSPS is to take place, how long it is expected to last, when restoration is expected to begin, and for public safety partners, how they can receive GIS files for the areas.	11.2.6, 12.2.3, 12.2.5 13.1, Appendix C
25-233-ALL_2513	Work with Staff to develop content regarding inspection program details, clearly associated with relevant governing codes, in addition to utility specific inspection programs (such as infrared inspections, etc.). Further details provided should include an annual summary of general findings and correction plan results of those findings.	7.1, 7.3, 8.1, Appendix C
25-233-ALL_2514	Work with Staff to develop content regarding industry engagement activities including pilot program development and deployment. The content should describe current, proposed or piloted program changes, outlining any cross-utility collaborations and/or industry learnings which directed the change.	5.6, 13.3, Appendix C

Appendix C – Areas of Additional Improvement

Order 24-230 Recommendations

Areas for Additional Improvement/Recommendations Citation: 24-230-2

Recommendation: Identify which risk modeling processes are informed solely by accepted data models and which are adjusted by subject matter experts. For processes adjusted by subject matter experts, describe how they are adjusted. Provide demonstration of how subject matter expert input has informed the model by comparing and contrasting the output of those processes.

Utility Response: The Company uses risk modeling to inform diverse wildfire risk mitigation work. Long-term risk modeling is discussed in Section 4, and near-term modeling is discussed in Section 8.5.1. For the Company's long-term risk modeling (i.e., Planning Model Version 2), mitigation effectiveness assumptions are based on subject matter expert judgement, referencing peer utility effectiveness values where available. For additional information on mitigation effectiveness, refer to Sections 4.2.3 and 5.2.3.2.

For near-term risk modeling for operational decision-making, the Company uses multiple weather models, including the internal PacifiCorp WRF deterministic and ensemble models. For adjustments by subject matter experts, meteorologists will look at several different weather models at various forecasting times and select the model data that makes the most sense according to their expertise. Furthermore, meteorologists keep track of how certain models are performing at different times of year and put more weight or emphasis on that model due to its recent performance.

For determining near-term risk for wildfire potential, PacifiCorp has adopted specific criteria that optimize performance from a historical statistical analysis of fire history across the six-state service territory. These metrics are used in forecasting for wildfire potential. Additional near-term fire potential indicators are taken into consideration after an automated value is produced from the internal WRF model. Additional considerations are used to adjust the fire potential forecast to be more in line with current observed values. These components are discussed in further detail in Section 8.5.1.

Areas for Additional Improvement/Recommendations Citation: 24-230-3

Recommendation: Provide information about the development of composite risk scores which outlines when any addition, versus multiplication, of risk score components is best used to develop a single metric. In the case of 5C9 circuit segment (or any other circuit having negligible wind impacts), please explain how the risk of wind is being appropriately accounted for in the risk ranking of circuits. Also, please explain how the length of circuit exposure is factored into the risk ranking of circuits.

Utility Response: As discussed in Section 4, PacifiCorp replaced Planning Model Version 1 with Planning Model Version 2, which no longer references the unitless wildfire risk scores used in Planning Model Version 1.

Regarding circuit length, risk exposure, and risk ranking: As described in Section 4.2.3, in Planning Model Version 2 PacifiCorp's grid infrastructure is segmented according to momentary zones of protection (ZOPs), and the resulting circuit segments are assessed for risk and ranked. Longer circuit segments generally face greater risk exposure, which could result in higher risk rankings. To account for this, Planning Model Version 2 provides mitigation recommendations based on a monetized risk spend efficiency (RSE). RSE accounts for the effect of circuit length because the potential cost of a mitigation generally increases with segment length along with the monetized risk. Therefore, the calculated ratio of potential project costs to estimated risk reduction scales with segment length and corresponding risk exposure.

Areas for Additional Improvement/Recommendations Citation: 24-230-4

Recommendation: Detail if and how ignition risk drivers, including equipment failure and contact from objects, are further investigated by the Company. Describe how any additional investigation or analysis is used to inform mitigation plan selection.

Utility Response: Currently, PacifiCorp collects information on utility-related incidents such as ignitions and outages and performs analyses of the incidents. Based on the results of the analyses, there may be updates to Company material or construction standards, asset management policies and procedures, or no additional action if it was determined the equipment performed as expected.

As an example of data collected from outages leading to a mitigation activity, PacifiCorp found during an outage investigation that at one point hotline clamp connectors were connected directly to primary lines, increasing the potential for an ignition. To mitigate this risk, the Company is proactively identifying these lines during inspections and updating the equipment to the current standard. From the data collected on outages, PacifiCorp does not see similar issues with equipment installed to current standards.

Generally, the Company maps ignition risk drivers to outage cause codes as described in Section 4.4. The Company utilizes outage data in its long-term risk mitigation planning model as described in Sections 4.2.3 and 4.4.

Areas for Additional Improvement/Recommendations Citation: 24-230-5

Recommendation: Provide the effect of short-term fuel (such as related to recently burned areas on the seasonal, short-term, and long-term risks). Clarify how these effects (such as the absence or existence of fuel for a short period) inform selection of mitigations, whether operational actions (such as Public Safety Power Shutoff) or long-term actions (such as reconductoring). Explain how later year work will be executed since the WMP describes the need for Plan modification but does not clearly outline what the output is.

Utility Response: PacifiCorp currently models long-term and short-term risk.

Decision-making and modeling for short-term operational actions such as ESS or PSPS may but are unlikely to be influenced by changes in the availability of short-term fuels. PacifiCorp receives an updated fuel layer annually to its Technosylva FireRisk software that allows for an up-to-date understanding of its fuelscape. The Company uses internal Normalized Differential Vegetation Index

(NDVI) machine learning data and publicly available four-day moving averages of NDVI to inform short-term risks. The conditions of a recently burned area are also considered, which usually varies depending on the types of fuels that were burned, the severity that the fuels burned, and what fuels may regenerate in their place.

The deployment of long-term mitigations such as system hardening efforts like covered conductor or the undergrounding of transmission or distribution lines is unlikely to be influenced by changes in the availability of short-term fuels. For long-term risk modeling in FireSight, the primary fuels affected by a fire, the severity of the fire, and the fire scar are incorporated into the model. Regrowth of fuels is also included in the model from historic fires. Simulations are run to project the regrowth of fuels over time that is accounted for in the model results and ultimately the wind-driven and fuel/terrain-driven wildfire risk scores that PacifiCorp calculates. The wildfire risk score, as described in Appendix H, is used to establish the HFRZ, which informs vegetation management and asset inspection activities. Changes resulting from burned areas are less likely to significantly alter long-term risk modeling or yield different outcomes in risk modeling than ones previously observed prior to an area having become burned; therefore, the selection of long-term mitigations is less likely to be influenced because of different modeling results. To the extent that short-term changes to fuel occur, any modification to long-term mitigation project planning or prioritization would occur during the project scoping and design phase under engineering and planning review. By periodically updating fuel layers, the Company can adjust prioritization of ignition-consequence scoring to capture both the short-term reduction in fire spread potential and the expected return of fuels over time. PacifiCorp intends to continually evaluate how to better inform short-term and long-term operational and mitigation decision-making relative to the changing availability of fuels adjacent to Company infrastructure.

Areas for Additional Improvement/Recommendations Citation: 24-230-6

Recommendation: Provide a state-wide listing of circuit risks (or circuit segments or circuits zones of protections), cumulatively, and demonstrate the risk reduction intended after the mitigations outlined have been completed (Table 5 for Top 20 and Appendix D updated).

Utility Response: Please see Table 4-6 in Section 4.7 for a ranked list of circuit segments with the top 5% of risk and Table 4-7 for a listing of model-recommended mitigations and corresponding calculated risk reduction based on Planning Model Version 2 results for these circuits. The ranking of the circuits in Table 4-6 is based on Planning Model Version 2. Due to the volume of monetary zones of protection (approximately 1,150), providing a complete state-wide listing in the WMP of segment-level risk results from Planning Model Version 2 is not actionable. A complete list of circuit segments is in the RSE Workbook.

The risk scores for initiatives presented in Appendix E for the 2026–2028 WMP cycle are from the Planning Model Version 1, and risk reduction has not been calculated for these initiatives as the effectiveness of mitigations such as covered conductor and undergrounding was not part of Planning Model Version 1. It is important to note that for system hardening work in particular, there can be a lag between these mitigation planning developments and their impacts on the ground. As the Company discusses in Section 5.2.2.2, risk and RSE modeling serves as a foundation for PacifiCorp's system hardening strategy development, but additional optimization occurs thereafter over the course of implementing specific mitigation projects. For the Company to achieve timely, consistent progress deploying system hardening projects, it follows through on projects that are already in the implementation process even though they were scoped and prioritized using a legacy modeling approach.

Areas for Additional Improvement/Recommendations Citation: 24-230-9

Recommendation: Explain how the Company determines who qualifies as a public safety partner. Describe how Pacific Power manages contact lists to ensure the ability to make contact, including primary and secondary contact methods. As the Public Safety Partner Portal evolves, ensure discussions with public safety partners include how the portal helps to make such contact more reliable and effective.

Utility Response: As described in Section 11.2.3, PacifiCorp defines a public safety partner as an organization, agency, or entity that collaborates with public safety agencies, such as police, fire departments, and emergency medical services, to enhance safety, security, and disaster response. Public safety partners may also include government bodies, non-governmental organizations, community groups, or private companies working together to address public safety challenges. Public safety partners include, but are not limited to:

- Emergency responders at the local, state, and federal level
- Water, wastewater, and communication service providers
- Energy providers (electricity, natural gas, fuels)
- Local, county, or state emergency managers
- Members of the Oregon Emergency Response System (OERS) Council
- Telecommunications providers
- Water agencies
- Other disciplines as determined

As discussed in Section 11.2.6, the public safety partners are responsible for keeping their contact information up to date in the PSP Portal. PacifiCorp emergency managers maintain regular contact with public safety partners throughout the Company's service territory and with the Oregon Department of Emergency Management (ODEM). PacifiCorp utilizes the emergency management point of contact list distributed by ODEM for changes to state, county, and Tribal emergency management contacts.

PSP Portal site features and functionality will continue to evolve and improve with increased registration, use, and partner recommendations. Improvements, as indicated in the 2025 WMP Update, include expanded functionality to include emergency event workflows, additional and updated email notification capability, streamlined event area creation using isolation device logic, automated processes for user access audit functionality, technical enhancements, increased load performance, and additional user experience enhancements. More recently, the portal was updated to improve the accuracy of GIS polygons and to include isolation devices in the information for public safety partners.

Areas for Additional Improvement/Recommendations Citation: 24-230-10

Recommendation: Provide information regarding its use of community-based organizations to provide additional information relevant to vulnerable populations beyond those in its own system, as well as leveraging community-based organizations to communicate opportunities for customers to self-identify for advance notice of Public Safety Power Shutoffs.

Utility Response: Consistent with this recommendation, PacifiCorp regularly engages with a broad audience of community-based organizations (CBOs) via the Company's regional business manager and emergency manager channels. These interactions are also supplemented by a host of informal communications on a case-by-case basis as requested by CBOs and the community. In 2025, PacifiCorp developed a new Access and Functional Needs (AFN) Self-Certification webform and an Accessibility Programs Toolkit for Partners. The toolkit includes resources for CBOs and other partners to use on websites and social media, links to flyers, and other resources on the Company's customer programs and wildfire preparedness to share with their clients and communities. In the toolkit is a link to a new one-stop-shop Accessibility Programs webpage that includes the new AFN Self-Certification webform. In 2025, emergency managers and regional business managers began sharing the toolkit with the CBOs and other service providers with whom they coordinate on a routine basis. Moving forward, the Company intends to distribute the toolkit annually.

Areas for Additional Improvement/Recommendations Citation: 24-230-14

Recommendation: Provide information regarding its use of community-based organizations to provide additional information relevant to vulnerable populations beyond those in its own system, as well as leveraging community-based organizations to communicate opportunities for customers to self-identify for advance notice of Public Safety Power Shutoffs.

Utility Response: Consistent with this recommendation, PacifiCorp regularly engages with a broad audience of community-based organizations (CBOs) via the Company's regional business manager and emergency manager channels. These interactions are also supplemented by a host of informal communications on a case-by-case basis as requested by CBOs and the community. In 2025, PacifiCorp developed a new Access and Functional Needs (AFN) Self-Certification webform and an Accessibility Programs Toolkit for Partners. The toolkit includes resources for CBOs and other partners to use on websites and social media, links to flyers, and other resources on the Company's customer programs and wildfire preparedness to share with their clients and communities. In the toolkit is a link to a new one-stop-shop Accessibility Programs webpage that includes the new AFN Self-Certification webform. In 2025, emergency managers and regional business managers began sharing the toolkit with the CBOs and other service providers with whom they coordinate on a routine basis. Moving forward, the Company intends to distribute the toolkit annually.

Areas for Additional Improvement/Recommendations Citation: 24-230-15

Recommendation: Pacific Power should continue to develop analytics to support optimal inspection and correction actions for designated risk areas or identified assets that may result in fire risk (including equipment specifics or circuit segments). Data should support decisions on selection of the various inspection types (such as survey/patrol inspections, detail inspections, LiDAR, or drone-assisted visual surveys), the promptness or timing of corrections, as well as the quality assurance done to validate the program effectiveness. The Company should provide information about the development of these analyses and demonstrate how they maintain and operate the system.

Utility Response: PacifiCorp has made several changes to enhance its inspection and correction processes:

1. In 2024, PacifiCorp created an asset inspection condition called "Imminent," which is used when there is an imminent risk to safety or reliability. An imminent condition is corrected as soon as reasonably possible upon discovery through repair, disconnection, or isolation.

2. As described in Section 7.2.1.3, beginning in 2025, the Company began performing fire season safety patrols for all overhead distribution equipment annually. Previously, overhead distribution equipment inside the HFRZ was inspected annually, and outside of the HFRZ it was inspected biennially. This change aligns practices for consistency across the six-state service territory.
3. The Company has two main drone inspections programs: a drone-on-demand inspection program and a planned drone inspection program. The drone-on-demand inspections can be requested by anyone within the Company based on an identified need. One type of request is to inspect a circuit or circuit segment experiencing multiple outages while in ESS mode. The planned drone inspections, which are scheduled to begin in 2026, are based off of the detailed inspection cycle on circuits interconnected with the HFRZ as the inspection is performed at each individual pole and provides detailed information at the pole. The planned drone inspections schedule is offset from the detailed inspections cycle to spread out inspections and maximize the benefit of multiple inspection programs. Drone inspection programs offer substantial benefits over traditional ground inspections. Drones can access and capture detailed imagery of transmission and distribution infrastructure that is difficult or impossible to inspect thoroughly from the ground. This allows the Company to identify deficiencies such as damaged hardware or equipment degradation before they lead to failures or safety hazards. By improving the ability to detect issues early, drone programs enhance system reliability, reduce the risk of outages, and support the overall safety and resilience of the electric system. These programs are discussed in Sections 7.2.1.7 and 7.2.1.8.

Areas for Additional Improvement/Recommendations Citation: 24-230-16

Recommendation: Staff recommends that vegetation actions and their timing be outlined and explain what led to that approach with any explanation for validating those tactics. As underlying data analytics are developed which further validate or modify the elements of the vegetation management program, provide updates, and reconcile against historic program actions.

Utility Response: PacifiCorp conducted a review of historical information to determine appropriate frequency of routine cycle maintenance. Due to data limitations, cycle frequency optimization could not be definitively determined; however, the analysis did support increase in frequency of inspection to yield increased program performance against maintaining clearance distances. The results of this limited analysis support increased frequency of inspection to identify and address vegetation conditions, which is consistent with the rationale of conducting off-cycle inspection in the HFRZ. Through the expected deployment of a new work management software system to be implemented in Q1 2026, vegetation management data will be collected in a manner that is anticipated to support future analysis to optimize vegetation management actions once sufficient data is collected.

As indicated in the exploration of remote sensing technology in Section 8.2.10, the Company is continually evaluating opportunities to utilize systems that better inform its decision-making for data integrating applications to augment or provide strategic value to PacifiCorp's vegetation management program.

Areas for Additional Improvement/Recommendations Citation: 24-230-17

Recommendation: Staff recommends that Pacific Power engage as outlined in Joint Recommendations K and L to quantify segment or zone of protection level risk for its assets and utilize these results to evolve its Table 5, Top 20 circuit risk; with this approach, develop a system-wide view of the segment/ zone of protection/ circuit risk as an input into current and future prioritization efforts.

Utility Response: As described in Section 4.2.3, for Planning Model Version 2 the Company adopted the momentary zone of protection (ZOP) as its risk unit, meaning each momentary ZOP is considered a circuit segment, assessed for risk and potentially recommended a mitigation. Please refer to Table 4-7 for a listing of model-recommended mitigations for the top 5% riskiest momentary ZOPs and corresponding calculated risk reduction based on Planning Model Version 2 results. Refer to Section 5 for the Company's use of long-term risk modeling results for mitigation prioritization efforts.

All-Utility Recommendations

Areas for Additional Improvement/Recommendations Citation: 24-230-H

Recommendation: All utilities should provide industry engagement information though a standard reporting template which outlines participation in industry forums and expected information to be shared in such forums, including results from pilots prior to widescale adoption, and pilot valuation methods.

Utility Response: Please see Table OPUC 14-1 for industry engagement information. The WMP template, including Table OPUC 14-1, was approved by the OPUC in Order 25-326.

Areas for Additional Improvement/Recommendations Citation: 24-230-I

Recommendation: All utilities should provide pilot technology information though a standard reporting template which includes: details of pilot projects, goals for the pilot, status of the pilot (planning, development, implementation), the current penetration and saturation across the system, envisioned application, milestones for determining usefulness of pilot, expected capital costs, expected O&M costs, expected timeframe for pilot implementation and lifespan. (Phase 2). At minimum this level of detail is needed for the following pilot technologies:

- Communicating fault circuit indicators (CFCI);
- Fuel load reduction projects;
- Wildfire detection cameras;
- Early fault detection;
- Drone inspection pilot;
- Distribution fault anticipation;
- Covered conductor or spacer cable; and
- Infrared patrols.

Utility Response: Please see Table OPUC 5-2 for standard reporting of pilot technology. The WMP template, including Table OPUC 5-2, was approved by the OPUC in Order 25-326. Table OPUC 5-2 describes PacifiCorp's current pilots.

The following technologies listed in Recommendation 24-230-I are described in the following sections and are being used by PacifiCorp as wildfire mitigation tactics:

- Communicating fault circuit indicators (CFCI): Section 6.2.5
- Wildfire detection cameras: Section 9.2.4
- Covered conductor or spacer cable: Sections 6.2.1 and 6.2.9

Areas for Additional Improvement/Recommendations Citation: 24-230-J

Recommendation: Staff foresees the working group allowing participation the public, including public safety partners, wildfire experts, and impacted communities. Staff has chosen not to include more detailed information on Work Group meeting schedules or plans at this time and intends these would be developed in consultation with the utilities and stakeholders if the Joint Recommendations are approved. All utility risk maps should originate from a foundational utility risk map which considers the logical set of variables. Short-range outlooks, as well as mid-range outlooks may inform the foundational map. After developing the foundational map, a utility risk map can consider and overlay a variety of conditions, such as response times and locale as well as locations where mitigations have taken place or recent fuel has been removed. Any adjustments made to the foundational risk maps or the outlooks should be explicitly identified and recorded as to what variable caused the change and what new information supported this change.

Utility Response: In 2025, PacifiCorp participated in OPUC-led UM 2340 workshops, which begot the WMP Phase 2 Standardization of Shared Terminology and Format for Multiyear Wildfire Mitigation Plans that were approved by the Commission in Order 25-326 and utilized in the production of the Company's 2026-2028 WMP.

Regarding the Company's foundational utility risk mapping, refer to Sections 4.2.1 and 4.2.2 and Appendix H for the underlying analysis and results of PacifiCorp's current high fire risk zone (HFRZ). The Company did not implement any changes to its HFRZ since its 2025 update and therefore did not have adjustments to identify. Refer to Sections 4.7 and 4.8, specifically, the HFRZ Update initiative, for the Company's plans to evolve its HFRZ in the 2026-2028 WMP cycle.

Areas for Additional Improvement/Recommendations Citation: 24-230-K

Recommendation: All utilities should collaborate to calibrate their risk modeling methods and identify the underlying assumptions in determining line segment risk. Some of the assumptions might include fire spread modeling periods, probability being considered, fire weather history, and inclusion of response likelihood. This work approach would result in fundamental agreement on a specific modeling method for which each utility would produce its current asset register, as well as GIS and tabular data identifying the risk scoring for each asset.

Utility Response: In 2025, the Company participated in OPUC Staff-led UM 2340 workshops, which resulted in the OPUC RSE Workbook that was approved in Commission Order 25-436. Refer to Appendix J for the Company's inputs and results for the OPUC RSE Workbook.

Areas for Additional Improvement/Recommendations Citation: 24-230-L

Recommendation: The WMP working group should adopt Risk Mitigation and Cost Valuation (RSE) as its part of its area of focus. This Staff-led working group should propose risk quantification guidelines to the Commission for implementation in the 2026 WMPs. RSE should reflect granular data for electric assets which quantify risk that is derivative of operational data (include outage and device state information), observational data (inspections), temporal data (snapshots in time related to peripheral systems) and should fully comprise all the facilities that are part of the utility's HFRZ. Consistency of terminology, data sources and their confidence, and expected calculation processes should be prepared by the utilities but performed consistent with guidance by the OPUC. In addition, RSE needs to recognize the manner in which "risk" is quantified by the utility, and generally result in an agreed-upon method for the quantification and the way that the reduced risk will be measured. This could leverage PacifiCorp's "composite risk" or one of the other IOU's risk quantification methods.

Utility Response: In 2025, the Company participated in OPUC Staff-led UM 2340 workshops, which resulted in the OPUC RSE Workbook that was approved in Commission Order 25-436. Refer to Appendix J for the Company's inputs and results for the OPUC RSE Workbook.

Areas for Additional Improvement/Recommendations Citation: 24-230-M

Recommendation: All utilities should regularly participate in a cross-utility effort, via working group or other format, to share experience, learnings, and industry best practices, surrounding system reliability. At minimum, this effort should include discussion of sophisticated protection control equipment and its application to sensitive settings, consideration of impact to reliability, in particular the response during elevated risk season with repeated outages to customers when "self healing" is not in place (resulting in them experiencing nuisance trips). This group should not only consider impacts to system-level reliability but consider impacts of momentary interruptions and longer sustained outages to remote customers, particularly those which may be less able to sustain during poorer reliability periods.

Utility Response: The Company utilizes internal experience and research published by other utilities and participates in collaborative event opportunities available to learn from others about enhancements to improve reliability while reducing wildfire risk. This involves participating in IEEE working groups related to protection for wildfire risk as well as joint IOU meetings. Participation and collaboration in these opportunities have supported refinement to ESS practices, which are discussed in Section 10. For example, a best practice that PacifiCorp learned from peer IOUs is the use of second harmonic blocking setting in certain intelligent electronic relaying devices. This allows a relay to block second harmonics that can result from re-energization of a circuit while also maintaining fast tripping capability to reduce wildfire risk.

Areas for Additional Improvement/Recommendations Citation: 24-230-N

Recommendation: All utilities should regularly participate in a cross-utility effort, via working group or other format, to share experience, learnings, and industry best practices for identifying and coordinating with public safety partners, building on-the-ground relationships and communication, developing livestream/recorded multi-language community meetings, and coordinating with local communities to participate in safety fairs.

Utility Response: The Western Utilities Wildfire Communications Workshop, hosted by PacifiCorp as discussed in Section 13.2.1 and 13.3.1, has included discussions on internal communications, digital media, paid media, media relations, community engagement, and lessons learned. Additionally, these meetings have touched on topics such as community and regional-specific information, the use of third-party voices such as public safety partners to speak/present alongside utilities on wildfire safety, and the use of in-person and virtual options, as well as multilingual options.

As discussed in Section 13.3.2, PacifiCorp has hosted or attended over 50 local public safety partner meetings to date. These meetings include local emergency planning committees and regional disaster planning committees, among others. Additionally, the Company has hosted or participated in 22 community events in 2025, including nine Oregon Wildfire Mitigation Plan in-person forums with livestream ASL and Spanish interpretation. As indicated in Section 13.2.2, PacifiCorp also participates in regulatory proceedings, town hall meetings, and open-house events to engage other industry leaders and community leaders and members. Events focus on a range of PacifiCorp's wildfire emergency planning and preparedness programs, including communications protocols, notifications protocols, and resource coordination efforts. These are discussed further in Sections 11.2.3 and 12.2.3.

Areas for Additional Improvement/Recommendations Citation: 24-230-O

Recommendation: All utilities should collaborate to develop consistent content (and should conform to generally consistent language) to inform customers, communities, and public safety partners about operational protocols which can impact their power reliability and power system operations. As a complement to these approaches, utilities should perform analysis regarding the location-specific impacts to reliability, including the increase in customer complaints internally as well as those recorded by the OPUC consumer services division, and develop methods to quickly react to heightened operations impacting customers' reliability. Customers and communities may benefit from awareness of other outage causes (beyond weather), which impact reliability and during “sensitive settings” or “fire season” period or which could result in unusual reliability.

Utility Response: As demonstrated in Section 13.3.1, PacifiCorp facilitated two Western Utilities Wildfire Communications Workshops, which took place in March 2025 to prepare for the upcoming wildfire season and in November to discuss key learnings from the most recent season. These workshops provide valuable benchmarking and discussion about the best ways to communicate effectively. The other IOUs in Oregon (Idaho Power and Portland General Electric) have participated in these workshops, sharing their learnings from Oregon customers and communities. This workshop also brings learnings from other utilities across the Western United States and Canada, including those more experienced in wildfire mitigation. Going forward, PacifiCorp intends to continue hosting these workshops if interest in them continues, as demonstrated by initiative OR-CO-04 in Table OPUC 13-1.

In 2025, PacifiCorp tracked communities in Oregon who experienced multiple outages related to wildfire, acknowledging that multiple outages are a hardship for the Company’s customers. When an area was identified, PacifiCorp sent targeted emails to communities who experienced several ESS-related outages. The goal of these notifications was to let customers know what was causing the problem, what PacifiCorp was doing, and what next steps customers could take to prepare for outages. PacifiCorp plans to continue this targeted outreach approach to help address customer and community interest for more information during wildfire-related outages.

Areas for Additional Improvement/Recommendations Citation: 24-230-P

Recommendation: All utilities should collaborate to develop a template for reporting PSPS details during the execution of a PSPS, and Staff would appreciate participating in these sorts of collaborative development efforts.

Utility Response: This recommendation will be addressed in future IOU workgroup sessions.

Order 25-233 Recommendations

PacifiCorp Recommendations

Areas for Additional Improvement/Recommendations Citation: 25-233-2501

Recommendation: Pacific Power should outline how it plans to incorporate future land use and climate changes in order to demonstrate the Company's long-term plans align with the future state for those areas. Since such work is required in California, Staff believes there may be existing processes or approaches taken that could be explored by the Company and shared within the WMP.

Utility Response: Refer to Sections 4.7 and 4.8 for the Company's plans to implement a climate planning component into its long-term risk modeling.

Areas for Additional Improvement/Recommendations Citation: 25-233-2502

Recommendation: Pacific Power should provide wildfire risk scores (both RAVE and RAIL) for its circuit segments or zones of protection calculations for wind-driven and terrain/fuel-driven risk awareness.

Utility Response: Please refer to Section 4 for a description of PacifiCorp's updated wildfire risk analysis (Planning Model Version 2), which replaces the wind-driven and fuel/terrain-driven risk score with monetized risk.

Areas for Additional Improvement/Recommendations Citation: 25-233-2503

Recommendation: Pacific Power should justify its use of vendor project management to reduce costs to deliver covered conductor projects. It should also provide details comparing its forecast construction costs by cost elements, including project management costs. It should compare its forecast cost elements against historic cost elements for covered conductor construction (distinguishing between traditional crossarm and spacer cable projects).

Utility Response: PacifiCorp selected a vendor to assist with project management for the delivery of covered conductor projects to manage risk and ensure completion of increased target miles compared to the baseline number of completed miles PacifiCorp was able to complete without a vendor. Comparison of costs prior to the addition of the project management vendor to current costs is difficult due to several changes that occurred concurrently with the addition of the project management vendor, including increasing scale, changes to the scope for covered conductor projects, higher-than-typical inflation, and additional risk sharing in the agreed-on contract. These factors are discussed in greater detail below.

- Scale: PacifiCorp went from completing 82 miles in Oregon in 2023 (without the vendor) to 182 miles this year, more than doubling the number of completed miles. The additional scope exceeded the capacity of local unions to supply sufficient craft labor at straight time rates, resulting in overtime and substance pay to attract craft labor from other regions.
- Scope: The activities within the covered conductor program have increased to include additional post-construction inspections, replacing additional equipment such as overhead transformers that cannot be adequately protected with non-expulsion fuses, and additional pole replacements. These additional activities increase the cost per mile to complete projects independent of who is performing the work.
- Inflation: In the past two years there have been higher-than-historic cost increases to materials and labor. These would have to be factored into the comparison.

- Risk Sharing: The project management vendor's contract includes provisions where the contractor is responsible for different levels of risk than in other PacifiCorp contracts. The contractor is also responsible for both design and construction, shielding PacifiCorp from cost overruns due to design issues. Risk that PacifiCorp carries related to a project does not show as a project cost, and even realized risks may show separate from a project cost. By attaching design and construction risk directly to the entity conducting that segment of the mitigation implementation process, and deferring to vendor expertise, PacifiCorp reduces the likelihood of delays and cost overruns, ensuring timely wildfire mitigation and improved system reliability. This approach directly benefits customers by minimizing long-term risk exposure and maintaining service continuity in vulnerable jurisdictions.

Areas for Additional Improvement/Recommendations Citation: 25-233-2508

Recommendation: Include grant details in the WMPs for any new, or updated, approved grants for current and future receipts. Details shall include the project it benefitted, the awarding agency(s), amount awarded, timeline, and funding status. The Company should demonstrate how each grant impacts project costs and customer rates, as well as how the Company will manage reimbursement and any adjustments due to funding delays.

Utility Response: As described in Section 0, all the grants require PacifiCorp to first pay project costs and then demonstrate that the cost matches commitments and appropriate milestones are met. The grant agency will then reimburse part of the costs. All project costs are allocated into PacifiCorp's internal accounting system based on the project-specific work breakdown structure and task-related work orders, in compliance with both Company and federally approved budgets for the project scope. Additionally, the costs are aligned with the federally approved breakdown of project costs between PacifiCorp's cost share and grant funds. These costs are then reviewed by cost type to determine eligibility for federal reimbursement. Once this review is completed, a formal reimbursement request is submitted to the DOE. Following DOE approvals and disbursement of the reimbursement, the grant funds are applied to project costs.

Impacts of the grants on customer rates are through the annual filing of the Oregon WMP AAC. Each year costs are trued up to actual incurred in the reporting year most recently concluded, as well as to establish recovery levels to recover anticipated WMP AAC expense costs for the upcoming year based on the most recently approved WMP in Oregon. Annual WMP AAC updates also reflect true-ups of capital investment levels to most recently available actual in-service balances. Any grant received that reduces expenses or net capital in-service balances will be reflected in the true-up calculation of costs in the WMP AAC in the next annual filing for the reporting period covered.[17] Customers will see the impact of the grants on customer rates after OPUC approval of the AAC as a net impact on the requested change.

All Utility Recommendations

Areas for Additional Improvement/Recommendations Citation: 25-233-ALL_2504

Recommendation: Provide an explanation for current and future approaches for establishing associations between legacy outage data and ignition risk drivers. This should include providing any lookup tables or graphic and tabular depictions that clarify how the relationships are established until more direct relationships between outage management system data and the Risk and Ignition Event Categorization in the WMP Data Template. To the extent that the utility uses comments or other sources to identify "wire down events" or other values that better report on wildfire risk events, it should clarify the process used.

Utility Response: Refer to Section 4.4, which describes how ignition risk drivers are directly mapped to the Company's outage cause categories. Table 4-5 provides the association between specific ignition risk drivers and outage cause categories.

Areas for Additional Improvement/Recommendations Citation: 25-233-ALL_2505

[17] Please see Advice 25-0122 Schedule 190 Wildfire Mitigation Plan Cost Recovery Adjustment Filed July 1, 2025.

Recommendation: Greater analysis and exploration of outage causes and their correlation to ignition risk drivers should be quantified, ideally at a fault rate per unit length in the conductors/zones of protection. Each Company should participate in a process designed to explore correlations between ignition risk drivers and how they vary.

Utility Response: In 2025, the Company participated in OPUC Staff-led UM 2340 workshops, which resulted in the OPUC RSE Workbook that was approved in Commission Order 25-436. Refer to Appendix J for the Company's inputs and results for the OPUC RSE Workbook.

Areas for Additional Improvement/Recommendations Citation: 25-233-ALL_2506

Recommendation: Work with Staff to determine how best to produce information demonstrating the areas of utility risk that can be used by regulators, customers, and PSPS. This should include tabularly, circuit or circuit segments including, at minimum, the following information:

- Circuit ID by a circuit segment,
- Percent within Utility Wildfire Risk Area,
- Circuit or circuit segment risk scores,
- Ignition risk drivers resulting in score (with explanation of how the score was calculated),
- The operating area,
- The town or general location,
- HFRZ named area,
- Total overhead circuit length,
- Total underground circuit length, and
- The status of any project (such as under evaluation, ongoing, completed, or none).

Utility Response: In 2025, the Company participated in OPUC Staff-led UM 2340 workshops, which resulted in the OPUC RSE Workbook containing the information requested except for the "HFRZ named area," which is not applicable to PacifiCorp's HFRZ analysis or nomenclature, and "The status of any project (such as under evaluation, ongoing, completed, or none)." Refer to Appendix J for the Company's inputs and results for the OPUC's RSE Workbook. For the status of planned wildfire mitigation projects, refer to Table OPUC 6-1 in Section 6.4 and Table E-1 in Appendix E.

Areas for Additional Improvement/Recommendations Citation: 25-233-ALL_2507

Recommendation: Provide in the 2026 WMP a table of all current and planned mitigation work investments. Include the following details:

- Circuit ID or circuit segment,
- Risk score prior to and after improvement,
- RSE score,
- The historic ignition driving risk driver (historical outage records, weather or landscape changes),
- Capital investment cost,
- Expense (O&M) cost,
- Target date for engineering,
- Target date for construction,
- Target date for completion,
- Improvement units (miles of conductor changes, or equipment installed), and
- Comments on any year-over-year changes to the above.

Utility Response: Please see Appendix E for planned system hardening investments during the 2026-2028 WMP cycle. The risk scores in the table are from the Planning Model Version 1 and represent the maximum risk score on the circuit. It is important to note that for system hardening work in particular, there can be a lag between these mitigation planning developments and their impacts on the ground. As the Company discusses in Section 5.2.2.2, risk and RSE modeling serves as a foundation for PacifiCorp's system hardening strategy development, but additional optimization occurs thereafter over the course of implementing specific mitigation projects. For the Company to achieve timely, consistent progress deploying system hardening projects, it follows through on projects that are already in the implementation process even though they were scoped and prioritized using legacy modeling approach (Planning Model Version 1). 5.2.2.2

Areas for Additional Improvement/Recommendations Citation: 25-233-ALL_2509

Recommendation: Provide additional information when there are changes to work currently queued up for implementation. If a project is delayed, explain whether the delay will be resolved within the year or if delays are expected to continue into future years. For delays expected to continue into future years, note how the delay may affect risk reduction for the system.

Utility Response: Please see Section 2.3.1 for discussion of overall program delivery and the results subsections for specific results of mitigation measures.

Areas for Additional Improvement/Recommendations Citation: 25-233-ALL_2510

Recommendation: In the Multi-year and Update WMP Plans, track the historical and forecasted annual equipment upgrades (such as number of CFCIs installed, miles of spacer cable, miles of covered conductor (not spacer cable), miles of underground conductor, cameras installed, pole replacements, poles wrapped, etc.), including a comparison of projected and actual unit completion amounts by year.

Utility Response: Table OPUC 2-3 in Section 2.3 presents PacifiCorp's equipment upgrades for wildfire mitigation. PacifiCorp is able to provide planned actuals from 2021 through the third quarter of 2025 but does not have information on 2020 planned and actual equipment upgrades. PacifiCorp did not have specific targets for tree wire and spacer cable between 2020 and 2024, and the tree wire row reflects the total planned and actual upgrades for both equipment types.

Areas for Additional Improvement/Recommendations Citation: 25-233-ALL_2511

Recommendation: Include a list of any WMP-relevant surveys conducted during the year. Details should include the languages that the survey was offered in, the total responses, and an outline of each question asked and what the available responses were. Outline any lessons learned or program shifts as a result of the survey responses.

Utility Response: Since 2022, PacifiCorp has been conducting wildfire-related research in Oregon. The overall objective of the research is to measure the public's awareness of messaging related to wildfire preparedness and safety.

Specific research objectives include:

- Measure awareness of PacifiCorp messages related to wildfire preparedness
- Determine if survey refinements improve data actionability
- Identify recall of specific message topics
- Identify recall of message channels
- Measure recall and understanding of Public Safety Power Shutoff or PSPS
- Evaluate sources customers are most likely to turn to for information about PSPS
- Explore actions taken by customers to prepare for wildfire season
- Measure awareness of PacifiCorp's efforts to reduce the risk of wildfires
- Evaluate PSPS notifications perception
- Educate customers on wildfire programs and resources via survey participation

Audience and Methodology

PacifiCorp residential and business customers in Oregon, as well as critical customers, are contacted using a mix of online and phone surveys available in English and Spanish.

In addition, in-depth-interviews are conducted with community-based organizations and/or other community partners to collect deeper insights into community needs, expectations, concerns, and recommendations in general and as they relate to PacifiCorp.

The survey is conducted twice each calendar year; in April (pre-fire season) and again in September/October (post-fire season). Before each wave, the questionnaire is reviewed. In 2025, new questions were added about ESS and de-energization events. Also questions about access and function needs were refined to mitigate false positives, and at the end of the survey, those who identified as AFN could request resources and information from PacifiCorp.

Please see Section 0 and Appendix F for more information.

Areas for Additional Improvement/Recommendations Citation: 25-233-ALL_2512

Recommendation: In the 2026 WMP, describe the utility's capability for real-time communication during a PSPS event to customers and public safety partners, in the appropriate languages, the following information: what the current PSPS forecast is, where the PSPS is to take place, how long it is expected to last, when restoration is expected to begin, and for public safety partners, how they can receive GIS files for the areas.

Utility Response:

Please see Section 12.2.3 for discussion of public safety partner coordination during a PSPS event and Section 11.2.6 for a description of the Public Safety Partner Portal, a secure web-based application that hosts key information about customers whose facilities or infrastructure have been identified as critical. Public safety partners can access the portal during PSPS events to receive real-time updates and see geospatial information.

Please see Section 12.2.5 for discussion of PacifiCorp's customer communications strategy during a PSPS and Section 13.1 for translation services available to customers through the call center.

Areas for Additional Improvement/Recommendations Citation: 25-233-ALL_2513

Recommendation: Work with Staff to develop content regarding inspection program details, clearly associated with relevant governing codes, in addition to utility-specific inspection programs (such as infrared inspections, etc.). Further details provided should include an annual summary of general findings and correction plan results of those findings.

Utility Response: Please see the following sections and tables:

- Table OPUC 7-1: Lists asset inspection programs with their relevant OAR
- Table OPUC 7-2: List asset inspection corrections by their relevant OAR

- Table OPUC 7-3: Lists the number of asset conditions corrected inside the HFRZ by OPUC correct code and corrective timeframe
- Table OPUC 7-4: Lists the total number of conditions found by OPUC corrective and corrective timeframe
- Table OPUC 8-1: Lists PacifiCorp's vegetation management inspection types aligned with the OPUC inspection type

Areas for Additional Improvement/Recommendations Citation: 25-233-ALL_2514

Recommendation: Work with Staff to develop content regarding industry engagement activities, including pilot program development and deployment. The content should describe current, proposed, or piloted program changes, outlining any cross-utility collaborations and/or industry learnings which directed the change.

Utility Response: Please see Table OPUC 5-2 for standard reporting of pilot technology and Table OPUC 14-1 for industry engagement information. The WMP template, including Table OPUC 5-2 and Table OPUC 14-1, was approved by the OPUC in Order 25-326.

Appendix D – Detailed HFRZ Maps

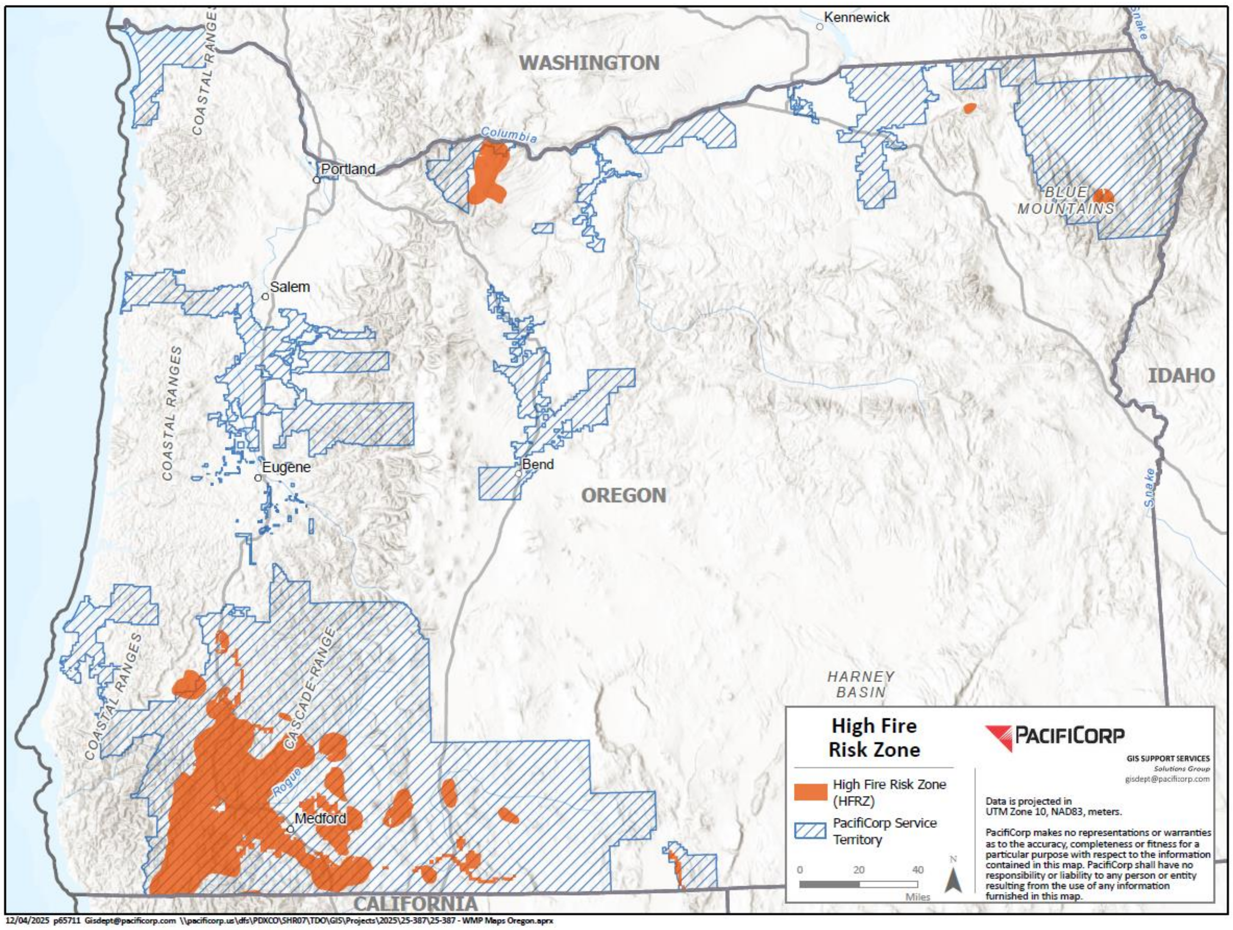

Figure D-1: PacifiCorp Service Territory in Oregon With High Fire Risk Zones

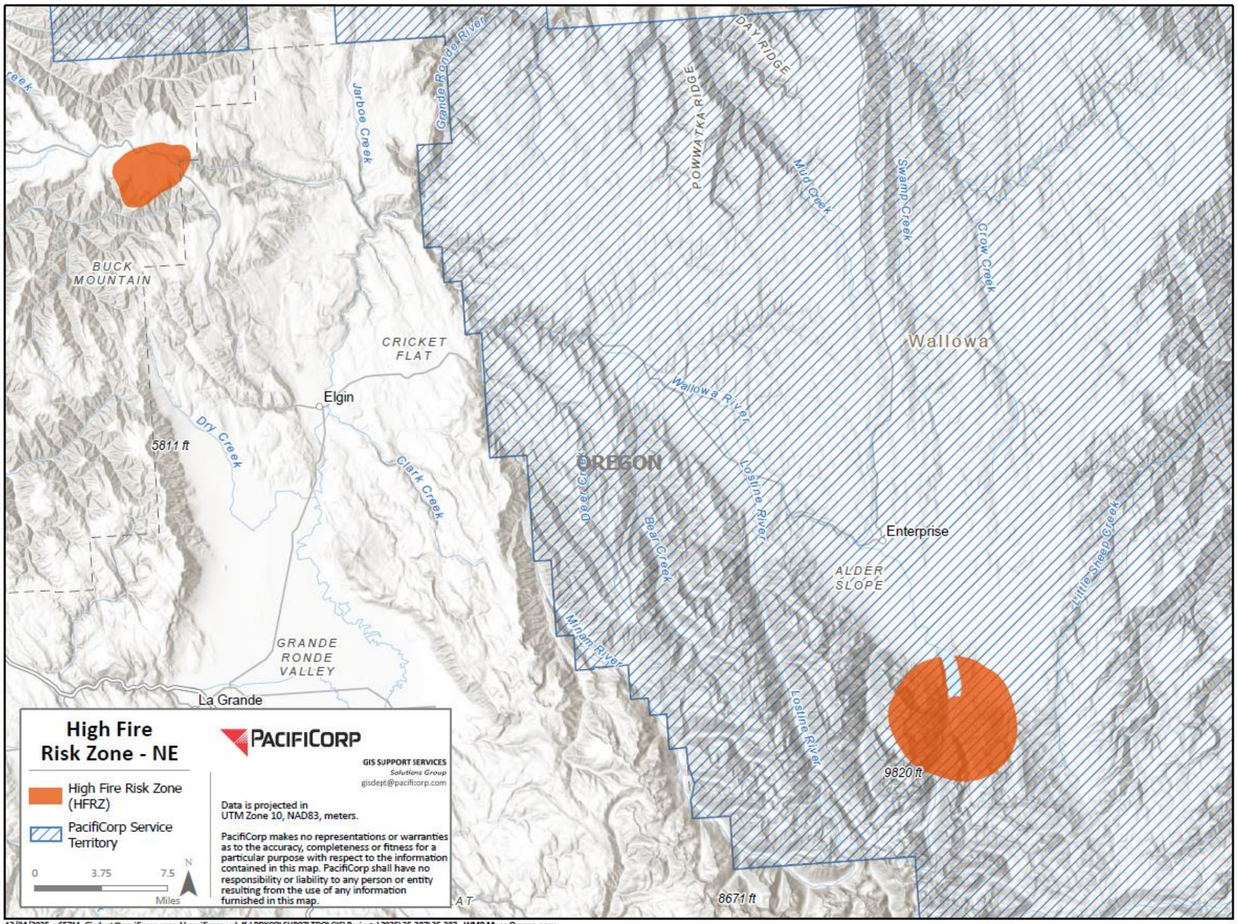

Figure D-2: High Fire Risk Zones in Northeast Oregon

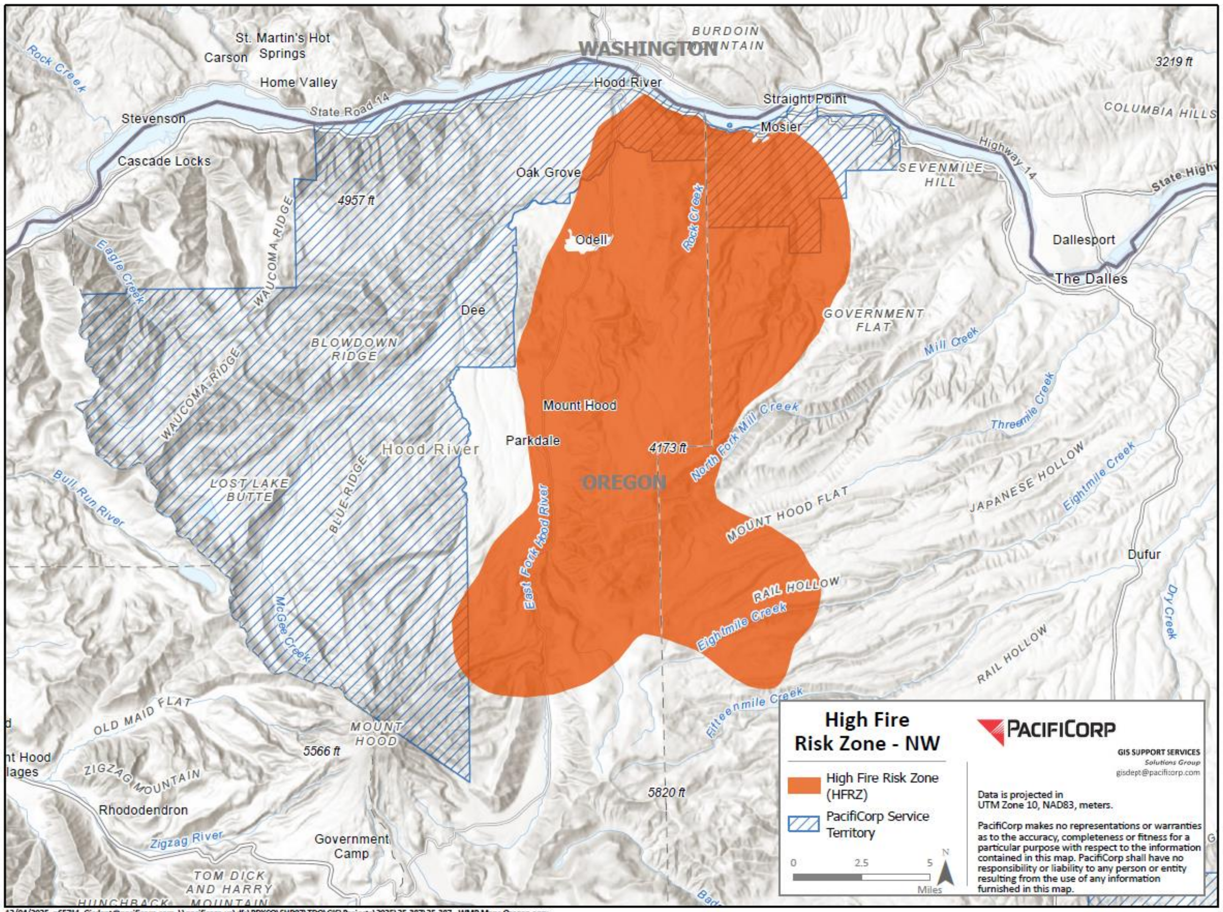

Figure D-3: High Fire Risk Zone in Northwest Oregon

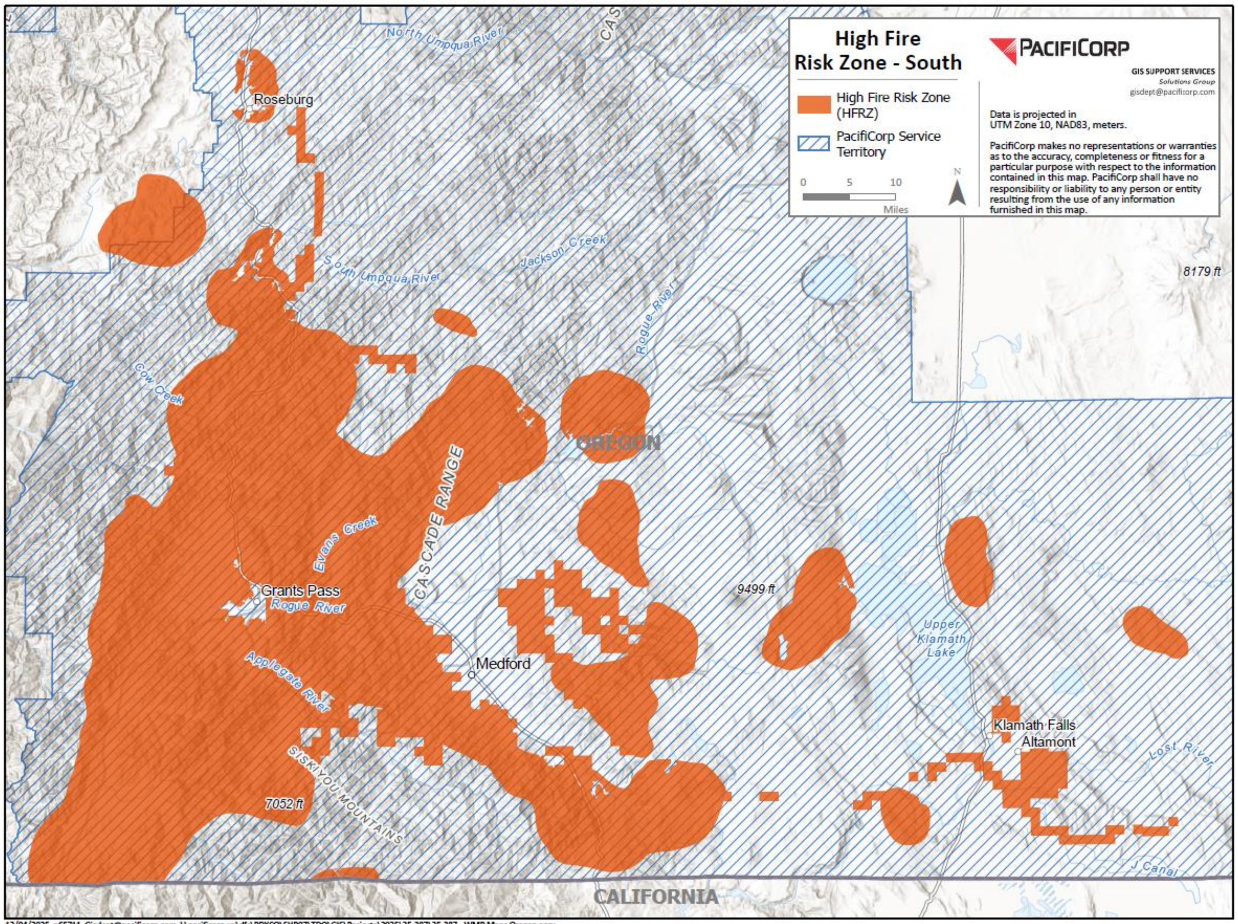

Figure D-4: High Fire Risk Zone in Southern Oregon

Appendix E – Current and Planned Mitigation Investments

In Table E-1 below are the current covered conductor (tree wire), undergrounding, and system automation initiatives for 2026 – 2028. The risk scores in the table are from the Planning Model Version 1 and represent the maximum risk score on the circuit. It is important to note that for system hardening work in particular, there can be a lag between these mitigation planning developments and their impacts on the ground. As the Company discusses in Section 5.2.2.2, risk and RSE modeling serves as a foundation for PacifiCorp's system hardening strategy development, but additional optimization occurs thereafter over the course of implementing specific mitigation projects. For the Company to achieve timely, consistent progress deploying system hardening projects, it follows through on projects that are already in the implementation process even though they were scoped and prioritized using a legacy modeling approach.

Table E-1: System Hardening Mitigation Investments for 2026-2028 Wildfire Mitigation Plan

Circuit ID/ ZOP ID	Risk Score Prior to Mitigation	Risk Score Post to Mitigation	RSE Score	Historic Ignition Driving Risk[18]	Capital Investment Costs ($1,000)	Operation and Maintenance Costs ($1,000)	Target Date for Engineering Completion	Target Date for Construction	Target Date for Completion	Mitigation Type and Units	Comments
4R35	0.84			Fuel/ Terrain	[redacted]		2025	2026	2026	Tree Wire 24 Line Miles	Planning model version 1
5L23	0.59			Fuel/ Terrain	[redacted]		2025	2026	2026	Tree Wire 14 Line Miles	Planning model version 1
5L27	0.74			Fuel/ Terrain	[redacted]		2025	2026	2026	Tree Wire 25 Line Miles	Planning model version 1
5L45	0.73			Fuel/ Terrain	[redacted]		2025	2026	2026	Tree Wire 32 Line Miles	Planning model version 1
5L45	0.73			Fuel/ Terrain	[redacted]		2025	2026	2026	Underground 2 Line Miles	Planning model version 1
5R172	0.90			Fuel/ Terrain	[redacted]		2025	2026	2026	Tree Wire 14 Line Miles	Planning model version 1
5R259	0.74			Fuel/ Terrain	[redacted]		2025	2026	2026	Tree Wire 16 Line Miles	Planning model version 1
5R288	0.80			Fuel/ Terrain	[redacted]		2025	2026	2026	Tree Wire 8 Line Miles	Planning model version 1
5R52	0.87			Fuel/ Terrain	[redacted]		2024	2026	2026	Tree Wire 17 Line Miles	Planning model version 1
5R53	0.90			Fuel/ Terrain	[redacted]		2024	2026	2026	Tree Wire 34 Line Miles	Planning model version 1
5R62	0.86			Fuel/ Terrain	[redacted]		2024	2026	2026	Tree Wire 4 Line Miles	Planning model version 1

[18] Provide the risk drivers creating the most risk for the Circuit ID/ZOP ID, such as historical outage types, weather or landscape changes.

Circuit ID/ ZOP ID	Risk Score Prior to Mitigation	Risk Score Post to Mitigation	RSE Score	Historic Ignition Driving Risk[18]	Capital Investment Costs ($1,000)	Operation and Maintenance Costs ($1,000)	Target Date for Engineering Completion	Target Date for Construction	Target Date for Completion	Mitigation Type and Units	Comments
5R63	0.89			Fuel/ Terrain	[redacted]		2025	2026	2026	Tree Wire 9 Line Miles	Planning model version 1
5R77	0.94			Fuel/ Terrain	[redacted]		2025	2026	2026	Tree Wire 6 Line Miles	Planning model version 1
4R33	0.90			Fuel/ Terrain	[redacted]		2026	2027	2027	Tree Wire 64 Line Miles	Planning model version 1
4R9	0.85			Fuel/ Terrain	[redacted]		2026	2027	2027	Tree Wire 70 Line Miles	Planning model version 1
5R182	0.92			Fuel/ Terrain	[redacted]		2026	2027	2027	Tree Wire 15 Line Miles	Planning model version 1
5R234	0.69			Fuel/ Terrain	[redacted]		2026	2027	2027	Tree Wire 37 Line Miles	Planning model version 1
4R33	0.90			Fuel/ Terrain	[redacted]		2027	2028	2028	Tree Wire 79 Line Miles	Planning model version 1
5R133	0.85			Fuel/ Terrain	[redacted]		2027	2028	2028	Tree Wire 101 Line Miles	Planning model version 1
3L40	Circuit not evaluated in model version 1				[redacted]		2022	2026	2026	Relay 1 Device	Circuit not evaluated in model version 1
4R13	0.88			Wind	[redacted]		2024	2026	2026	Relay 1 Device	Planning model version 1
4R16	Circuit not evaluated in model version 1				[redacted]		2024	2026	2026	Relay 1 Device	Circuit not evaluated in model version 1
4R17	0.69			Fuel/ Terrain	[redacted]		2024	2026	2026	Relay 1 Device	Planning model version 1

Circuit ID/ ZOP ID	Risk Score Prior to Mitigation	Risk Score Post to Mitigation	RSE Score	Historic Ignition Driving Risk[18]	Capital Investment Costs ($1,000)	Operation and Maintenance Costs ($1,000)	Target Date for Engineering Completion	Target Date for Construction	Target Date for Completion	Mitigation Type and Units	Comments
4W8	0.88			Fuel/ Terrain	[redacted]		2025	2026	2026	Relay, Breaker 2 Devices	Planning model version 1
5L113	0.21			Fuel/ Terrain	[redacted]		2026	2026	2026	Recloser 2 Devices	Planning model version 1
5L116	0.69			Fuel/ Terrain	[redacted]		2026	2026	2026	Recloser 3 Devices	Planning model version 1
5L2	0.77			Wind	[redacted]		2026	2026	2026	Recloser 1 Device	Planning model version 1
5L26	0.59			Fuel/ Terrain	[redacted]		2026	2026	2026	Recloser 2 Devices	Planning model version 1
5L27	0.74			Fuel/ Terrain	[redacted]		2026	2026	2026	Recloser 1 Device	Planning model version 1
5L3	0.52			Wind	[redacted]		2026	2026	2026	Recloser 1 Device	Planning model version 1
5L36	0.73			Fuel/ Terrain	[redacted]		2026	2026	2026	Recloser 1 Device	Planning model version 1
5L36	0.73			Fuel/ Terrain	[redacted]		2025	2026	2026	Relay 1 Device	Planning model version 1
5L4	0.86			Wind	[redacted]		2026	2026	2026	Recloser 1 Device	Planning model version 1
5L42	0.74			Fuel/ Terrain	[redacted]		2026	2026	2026	Recloser 2 Devices	Planning model version 1
5L44	0.69			Wind	[redacted]		2026	2026	2026	Recloser 1 Device	Planning model version 1
5L44	0.69			Wind	[redacted]		2025	2026	2026	Relay, Breaker 2 Devices	Planning model version 1

Circuit ID/ ZOP ID	Risk Score Prior to Mitigation	Risk Score Post to Mitigation	RSE Score	Historic Ignition Driving Risk[18]	Capital Investment Costs ($1,000)	Operation and Maintenance Costs ($1,000)	Target Date for Engineering Completion	Target Date for Construction	Target Date for Completion	Mitigation Type and Units	Comments
5L45	0.73			Fuel/ Terrain	[redacted]		2026	2026	2026	Recloser 3 Devices	Planning model version 1
5L45	0.73			Fuel/ Terrain	[redacted]		2025	2026	2026	Relay, Breaker 2 Devices	Planning model version 1
5L48	0.91			Fuel/ Terrain	[redacted]		2026	2026	2026	Recloser 2 Devices	Planning model version 1
5L5	0.66			Wind	[redacted]		2026	2026	2026	Recloser 1 Device	Planning model version 1
5L55	0.91			Fuel/ Terrain	[redacted]		2026	2026	2026	Recloser 2 Devices	Planning model version 1
5L55	0.91			Fuel/ Terrain	[redacted]		2025	2026	2026	Relay, Breaker 2 Devices	Planning model version 1
5L56	0.65			Fuel/ Terrain	[redacted]		2025	2026	2026	Relay 1 Device	Planning model version 1
5L58	0.74			Fuel/ Terrain	[redacted]		2025	2026	2026	Relay 1 Device	Planning model version 1
5L59	0.71			Fuel/ Terrain	[redacted]		2026	2026	2026	Recloser 1 Device	Planning model version 1
5L59	0.71			Fuel/ Terrain	[redacted]		2025	2026	2026	Relay 1 Device	Planning model version 1
5R114	0.87			Fuel/ Terrain	[redacted]		2024	2026	2026	Relay, Breaker 2 Devices	Planning model version 1
5R115	0.51			Fuel/ Terrain	[redacted]		2024	2026	2026	Relay, Breaker 2 Devices	Planning model version 1

Circuit ID/ ZOP ID	Risk Score Prior to Mitigation	Risk Score Post to Mitigation	RSE Score	Historic Ignition Driving Risk[18]	Capital Investment Costs ($1,000)	Operation and Maintenance Costs ($1,000)	Target Date for Engineering Completion	Target Date for Construction	Target Date for Completion	Mitigation Type and Units	Comments
5R120	Circuit not evaluated in model version 1				[redacted]		2024	2026	2026	Relay, Breaker 2 Devices	Circuit not evaluated in model version 1
5R121	0.55			Fuel/ Terrain	[redacted]		2024	2026	2026	Relay, Breaker 2 Devices	Planning model version 1
5R164	0.40			Wind	[redacted]		2024	2026	2026	Relay 1 Device	Planning model version 1
5R169	0.48			Wind	[redacted]		2024	2026	2026	Relay, Breaker 2 Devices	Planning model version 1
5R218	0.33			Wind	[redacted]		2025	2026	2026	Relay 1 Device	Planning model version 1
5R227	0.68			Fuel/ Terrain	[redacted]		2025	2026	2026	Relay 1 Device	Planning model version 1
5R237	0.60			Wind	[redacted]		2024	2026	2026	Relay 1 Device	Planning model version 1
5R238	0.86			Fuel/ Terrain	[redacted]		2024	2026	2026	Relay 1 Device	Planning model version 1
5R239	0.84			Fuel/ Terrain	[redacted]		2024	2026	2026	Relay 1 Device	Planning model version 1
5R240	0.49			Wind	[redacted]		2024	2026	2026	Relay 1 Device	Planning model version 1
5R312	0.49			Wind	[redacted]		2025	2026	2026	Relay 1 Device	Planning model version 1
5R748	Circuit not evaluated in model version 1				[redacted]		2024	2026	2026	Relay 1 Device	Circuit not evaluated in model version 1

Circuit ID/ ZOP ID	Risk Score Prior to Mitigation	Risk Score Post to Mitigation	RSE Score	Historic Ignition Driving Risk[18]	Capital Investment Costs ($1,000)	Operation and Maintenance Costs ($1,000)	Target Date for Engineering Completion	Target Date for Construction	Target Date for Completion	Mitigation Type and Units	Comments
5W13	Circuit not evaluated in model version 1				[redacted]		2025	2026	2026	Relay, Breaker 2 Devices	Circuit not evaluated in model version 1
5W14	0.18			Fuel/ Terrain	[redacted]		2025	2026	2026	Relay, Breaker 2 Devices	Planning model version 1
5W15	0.42			Fuel/ Terrain	[redacted]		2025	2026	2026	Relay, Breaker 2 Devices	Planning model version 1
5W26	0.86			Fuel/ Terrain	[redacted]		2025	2026	2026	Relay, Breaker 2 Devices	Planning model version 1
8R5	0.53			Fuel/ Terrain	[redacted]		2026	2026	2026	Relay 1 Device	Planning model version 1
068037/00	Circuit not evaluated in model version 1				[redacted]		2024	2027	2027	Relay 1 Device	Circuit not evaluated in model version 1
068043/00	Circuit not evaluated in model version 1				[redacted]		2024	2027	2027	Relay 1 Device	Circuit not evaluated in model version 1
2R267	Circuit not evaluated in model version 1				[redacted]		2026	2027	2027	Relay 1 Device	Circuit not evaluated in model version 1
2R30	Circuit not evaluated in model version 1				[redacted]		2026	2027	2027	Relay, Breaker 2 Devices	Circuit not evaluated in model version 1

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Circuit ID/ ZOP ID	Risk Score Prior to Mitigation	Risk Score Post to Mitigation	RSE Score	Historic Ignition Driving Risk[18]	Capital Investment Costs ($1,000)	Operation and Maintenance Costs ($1,000)	Target Date for Engineering Completion	Target Date for Construction	Target Date for Completion	Mitigation Type and Units	Comments
2U151	Circuit not evaluated in model version 1				[redacted]		2024	2027	2027	Relay 1 Device	Circuit not evaluated in model version 1
2U153	Circuit not evaluated in model version 1				[redacted]		2024	2027	2027	Relay 1 Device	Circuit not evaluated in model version 1
2U157	Circuit not evaluated in model version 1				[redacted]		2024	2027	2027	Relay 1 Device	Circuit not evaluated in model version 1.
2U7	Circuit not evaluated in model version 1				[redacted]		2024	2027	2027	Relay 1 Device	Circuit not evaluated in model version 1
4D68	0.72			Fuel/ Terrain	[redacted]		2027	2027	2027	Recloser, Relay 3 Devices	Planning model version 1
4M238	0.71			Fuel/ Terrain	[redacted]		2027	2027	2027	Recloser 1 Device	Planning model version 1
4U38	0.90			Fuel/ Terrain	[redacted]		2025	2027	2027	Relay 1 Device	Planning model version 1
4U39	1.00			Wind	[redacted]		2027	2027	2027	Recloser 1 Device	Planning model version 1
4U39	1.00			Wind	[redacted]		2025	2027	2027	Relay 1 Device	Planning model version 1
4U80	0.21			Fuel/ Terrain	[redacted]		2024	2027	2027	Relay 1 Device	Planning model version 1
4U81	0.91			Wind	[redacted]		2024	2027	2027	Relay 1 Device	Planning model version 1

Circuit ID/ ZOP ID	Risk Score Prior to Mitigation	Risk Score Post to Mitigation	RSE Score	Historic Ignition Driving Risk[18]	Capital Investment Costs ($1,000)	Operation and Maintenance Costs ($1,000)	Target Date for Engineering Completion	Target Date for Construction	Target Date for Completion	Mitigation Type and Units	Comments
4W8	0.88			Fuel/ Terrain	[redacted]		2027	2027	2027	Recloser, Relay 2 Devices	Planning model version 1
5L104	0.72			Fuel/ Terrain	[redacted]		2027	2027	2027	Recloser 1 Device	Planning model version 1
5L105	0.89			Fuel/ Terrain	[redacted]		2027	2027	2027	Recloser 1 Device	Planning model version 1
5L20	0.58			Fuel/ Terrain	[redacted]		2027	2027	2027	Recloser 3 Devices	Planning model version 1
5R1	0.24			Fuel/ Terrain	[redacted]		2026	2027	2027	Relay 1 Device	Planning model version 1
5R104	0.69			Fuel/ Terrain	[redacted]		2025	2027	2027	Relay 1 Device	Planning model version 1
5R105	0.42			Fuel/ Terrain	[redacted]		2025	2027	2027	Relay 1 Device	Planning model version 1
5R172	0.90			Fuel/ Terrain	[redacted]		2023	2027	2027	Relay 1 Device	Planning model version 1
5R173	0.83			Fuel/ Terrain	[redacted]		2023	2027	2027	Relay 1 Device	Planning model version 1
5R2	0.27			Fuel/ Terrain	[redacted]		2026	2027	2027	Relay 1 Device	Planning model version 1
5R209	0.23			Fuel/ Terrain	[redacted]		2026	2027	2027	Relay, Breaker 2 Devices	Planning model version 1
5R210	Circuit not evaluated in model version 1				[redacted]		2026	2027	2027	Relay, Breaker 2 Devices	Circuit not evaluated in model version 1

Circuit ID/ ZOP ID	Risk Score Prior to Mitigation	Risk Score Post to Mitigation	RSE Score	Historic Ignition Driving Risk[18]	Capital Investment Costs ($1,000)	Operation and Maintenance Costs ($1,000)	Target Date for Engineering Completion	Target Date for Construction	Target Date for Completion	Mitigation Type and Units	Comments
5R211	0.28			Fuel/ Terrain	[redacted]		2026	2027	2027	Relay 1 Device	Planning model version 1
5R226	0.30			Fuel/ Terrain	[redacted]		2026	2027	2027	Relay 1 Device	Planning model version 1
5R248	0.91			Fuel/ Terrain	[redacted]		2027	2027	2027	Recloser 1 Device	Planning model version 1
5R27	0.27			Fuel/ Terrain	[redacted]		2026	2027	2027	Relay, Breaker 2 Devices	Planning model version 1
5R28	0.29			Wind	[redacted]		2026	2027	2027	Relay 1 Device	Planning model version 1
5R29	0.26			Fuel/ Terrain	[redacted]		2026	2027	2027	Relay, Breaker 2 Devices	Planning model version 1
5R3	0.23			Fuel/ Terrain	[redacted]		2026	2027	2027	Relay 1 Device	Planning model version 1
5R359	0.38			Wind	[redacted]		2026	2027	2027	Relay 1 Device	Planning model version 1
5R361	0.41			Wind	[redacted]		2026	2027	2027	Relay 1 Device	Planning model version 1
5R362	Circuit not evaluated in model version 1				[redacted]		2026	2027	2027	Relay 1 Device	Circuit not evaluated in model version 1
5R364	0.45			Wind	[redacted]		2026	2027	2027	Relay 1 Device	Planning model version 1
5R367	Circuit not evaluated in model version 1				[redacted]		2026	2027	2027	Relay 1 Device	Circuit not evaluated in model version 1

Circuit ID/ ZOP ID	Risk Score Prior to Mitigation	Risk Score Post to Mitigation	RSE Score	Historic Ignition Driving Risk[18]	Capital Investment Costs ($1,000)	Operation and Maintenance Costs ($1,000)	Target Date for Engineering Completion	Target Date for Construction	Target Date for Completion	Mitigation Type and Units	Comments
5R47	0.35			Wind	[redacted]		2026	2027	2027	Relay 1 Device	Planning model version 1
5R77	0.94			Fuel/ Terrain	[redacted]		2027	2027	2027	Recloser 1 Device	Planning model version 1
5R85	Circuit not evaluated in model version 1				[redacted]		2026	2027	2027	Relay, Breaker 2 Devices	Circuit not evaluated in model version 1
5U134	Circuit not evaluated in model version 1				[redacted]		2023	2027	2027	Relay 1 Device	Circuit not evaluated in model version 1
5U46	0.86			Fuel/ Terrain	[redacted]		2023	2027	2027	Relay 1 Device	Planning model version 1
5U49	0.88			Fuel/ Terrain	[redacted]		2027	2027	2027	Recloser 4 Devices	Planning model version 1
5U52	0.87			Fuel/ Terrain	[redacted]		2023	2027	2027	Relay 1 Device	Planning model version 1
5U89	0.84			Fuel/ Terrain	[redacted]		2027	2027	2027	Recloser 3 Devices	Planning model version 1
5W26	0.86			Fuel/ Terrain	[redacted]		2027	2027	2027	Recloser 2 Devices	Planning model version 1
5W406	0.78			Fuel/ Terrain	[redacted]		2027	2027	2027	Recloser 3 Devices	Planning model version 1
2R16	Circuit not evaluated in model version 1				[redacted]		2023	2028	2028	Relay 1 Device	Circuit not evaluated in model version 1

Circuit ID/ ZOP ID	Risk Score Prior to Mitigation	Risk Score Post to Mitigation	RSE Score	Historic Ignition Driving Risk[18]	Capital Investment Costs ($1,000)	Operation and Maintenance Costs ($1,000)	Target Date for Engineering Completion	Target Date for Construction	Target Date for Completion	Mitigation Type and Units	Comments
2R8	Circuit not evaluated in model version 1				[redacted]		2023	2028	2028	Relay 1 Device	Circuit not evaluated in model version 1
3R27	Circuit not evaluated in model version 1				[redacted]		2023	2028	2028	Relay 1 Device	Circuit not evaluated in model version 1
3R30	Circuit not evaluated in model version 1				[redacted]		2023	2028	2028	Relay 1 Device	Circuit not evaluated in model version 1
3U66	Circuit not evaluated in model version 1				[redacted]		2022	2028	2028	Relay 1 Device	Circuit not evaluated in model version 1
4L50	0.68			Fuel/ Terrain	[redacted]		2026	2028	2028	Relay 1 Device	Planning model version 1
4U10	0.81			Fuel/ Terrain	[redacted]		2024	2028	2028	Relay 1 Device	Planning model version 1
4U18	0.75			Fuel/ Terrain	[redacted]		2023	2028	2028	Relay 1 Device	Planning model version 1
4U22	0.86			Fuel/ Terrain	[redacted]		2024	2028	2028	Relay 1 Device	Planning model version 1
4U23	Circuit not evaluated in model version 1				[redacted]		2024	2028	2028	Relay 1 Device	Circuit not evaluated in model version 1
4U30	0.82			Fuel/ Terrain	[redacted]		2024	2028	2028	Relay 1 Device	Planning model version 1
4U31	0.75			Fuel/ Terrain	[redacted]		2024	2028	2028	Relay 1 Device	Planning model version 1

Circuit ID/ ZOP ID	Risk Score Prior to Mitigation	Risk Score Post to Mitigation	RSE Score	Historic Ignition Driving Risk[18]	Capital Investment Costs ($1,000)	Operation and Maintenance Costs ($1,000)	Target Date for Engineering Completion	Target Date for Construction	Target Date for Completion	Mitigation Type and Units	Comments
4U5	0.75			Fuel/ Terrain	[redacted]		2024	2028	2028	Relay 1 Device	Planning model version 1
5L112	0.47			Wind			2025	2028	2028	Relay 1 Device	Planning model version 1
5L113	0.21			Fuel/ Terrain			2025	2028	2028	Relay 1 Device	Planning model version 1
5L114	Circuit not evaluated in model version 1						2025	2028	2028	Relay 1 Device	Circuit not evaluated in model version 1
5L116	0.69			Fuel/ Terrain			2025	2028	2028	Relay 1 Device	Planning model version 1
5L117	Circuit not evaluated in model version 1						2025	2028	2028	Relay 1 Device	Circuit not evaluated in model version 1
5L15	0.57			Wind			2026	2028	2028	Relay, Breaker 2 Devices	Planning model version 1
5L16	0.36			Fuel/ Terrain			2026	2028	2028	Relay, Breaker 2 Devices	Planning model version 1
5L17	0.43			Fuel/ Terrain			2026	2028	2028	Relay, Breaker 2 Devices	Planning model version 1
5L18	0.43			Wind			2026	2028	2028	Relay, Breaker 2 Devices	Planning model version 1
5L19	0.51			Fuel/ Terrain			2026	2028	2028	Relay, Breaker 2 Devices	Planning model version 1

Circuit ID/ ZOP ID	Risk Score Prior to Mitigation	Risk Score Post to Mitigation	RSE Score	Historic Ignition Driving Risk[18]	Capital Investment Costs ($1,000)	Operation and Maintenance Costs ($1,000)	Target Date for Engineering Completion	Target Date for Construction	Target Date for Completion	Mitigation Type and Units	Comments
5L2	0.77			Wind	[redacted]		2025	2028	2028	Relay, Breaker 2 Devices	Planning model version 1
5L20	0.58			Fuel/ Terrain	[redacted]		2026	2028	2028	Relay 1 Device	Planning model version 1
5L23	0.59			Fuel/ Terrain	[redacted]		2026	2028	2028	Relay 1 Device	Planning model version 1
5L230	Circuit not evaluated in model version 1				[redacted]		2025	2028	2028	Relay 1 Device	Circuit not evaluated in model version 1
5L26	0.59			Fuel/ Terrain	[redacted]		2025	2028	2028	Relay, Breaker 2 Devices	Planning model version 1
5L27	0.74			Fuel/ Terrain	[redacted]		2025	2028	2028	Relay, Breaker 2 Devices	Planning model version 1
5L3	0.52			Wind	[redacted]		2025	2028	2028	Relay, Breaker 2 Devices	Planning model version 1
5L4	0.86			Wind	[redacted]		2025	2028	2028	Relay, Breaker 2 Devices	Planning model version 1
5L46	0.52			Wind	[redacted]		2025	2028	2028	Relay 1 Device	Planning model version 1
5L48	0.91			Fuel/ Terrain	[redacted]		2025	2028	2028	Relay 1 Device	Planning model version 1
5L5	0.66			Wind	[redacted]		2025	2028	2028	Relay, Breaker 2 Devices	Planning model version 1

REDACTED

Circuit ID/ ZOP ID	Risk Score Prior to Mitigation	Risk Score Post to Mitigation	RSE Score	Historic Ignition Driving Risk[18]	Capital Investment Costs ($1,000)	Operation and Maintenance Costs ($1,000)	Target Date for Engineering Completion	Target Date for Construction	Target Date for Completion	Mitigation Type and Units	Comments
5L79	Circuit not evaluated in model version 1				[redacted]		2026	2028	2028	Relay 1 Device	Circuit not evaluated in model version 1
5R10	Circuit not evaluated in model version 1				[redacted]		2026	2028	2028	Relay, Breaker 2 Devices	Circuit not evaluated in model version 1
5R11	0.47			Wind	[redacted]		2026	2028	2028	Relay 1 Device	Planning model version 1
5R12	0.19			Fuel/ Terrain	[redacted]		2026	2028	2028	Relay, Breaker 2 Devices	Planning model version 1
5R123	0.76			Fuel/ Terrain	[redacted]		2023	2028	2028	Relay 1 Device	Planning model version 1
5R125	0.74			Fuel/ Terrain	[redacted]		2023	2028	2028	Relay 1 Device	Planning model version 1
5R13	0.19			Fuel/ Terrain	[redacted]		2026	2028	2028	Relay 1 Device	Planning model version 1
5R14	0.53			Fuel/ Terrain	[redacted]		2026	2028	2028	Relay, Breaker 2 Devices	Planning model version 1
5R174	0.60			Wind	[redacted]		2026	2028	2028	Relay 1 Device	Planning model version 1
5R176	Circuit not evaluated in model version 1				[redacted]		2026	2028	2028	Relay 1 Device	Circuit not evaluated in model version 1
5R180	0.44			Wind	[redacted]		2026	2028	2028	Relay 1 Device	Planning model version 1

Circuit ID/ ZOP ID	Risk Score Prior to Mitigation	Risk Score Post to Mitigation	RSE Score	Historic Ignition Driving Risk[18]	Capital Investment Costs ($1,000)	Operation and Maintenance Costs ($1,000)	Target Date for Engineering Completion	Target Date for Construction	Target Date for Completion	Mitigation Type and Units	Comments
5R182	0.92			Fuel/ Terrain	[redacted]		2026	2028	2028	Relay 1 Device	Planning model version 1
5R184	0.47			Wind	[redacted]		2026	2028	2028	Relay 1 Device	Planning model version 1
5R19	0.40			Fuel/ Terrain	[redacted]		2026	2028	2028	Relay, Breaker 2 Devices	Planning model version 1
5R258	Circuit not evaluated in model version 1				[redacted]		2023	2028	2028	Relay 1 Device	Circuit not evaluated in model version 1
5R259	0.74			Fuel/ Terrain	[redacted]		2023	2028	2028	Relay 1 Device	Planning model version 1
5R270	Circuit not evaluated in model version 1				[redacted]		2026	2028	2028	Relay 1 Device	Circuit not evaluated in model version 1
5R294	Circuit not evaluated in model version 1				[redacted]		2025	2028	2028	Relay 1 Device	Circuit not evaluated in model version 1
5R295	0.37			Fuel/ Terrain	[redacted]		2025	2028	2028	Relay 1 Device	Planning model version 1
5R322	0.41			Fuel/ Terrain	[redacted]		2023	2028	2028	Relay 1 Device	Planning model version 1
5R330	Circuit not evaluated in model version 1				[redacted]		2025	2028	2028	Relay 1 Device	Circuit not evaluated in model version 1
5R331	Circuit not evaluated in model version 1				[redacted]		2025	2028	2028	Relay 1 Device	Circuit not evaluated in model version 1

Circuit ID/ ZOP ID	Risk Score Prior to Mitigation	Risk Score Post to Mitigation	RSE Score	Historic Ignition Driving Risk[18]	Capital Investment Costs ($1,000)	Operation and Maintenance Costs ($1,000)	Target Date for Engineering Completion	Target Date for Construction	Target Date for Completion	Mitigation Type and Units	Comments
5R334	0.56			Fuel/ Terrain	[redacted]		2025	2028	2028	Relay 1 Device	Planning model version 1
5R335	Circuit not evaluated in model version 1				[redacted]		2025	2028	2028	Relay 1 Device	Circuit not evaluated in model version 1
5R66	0.72			Wind	[redacted]		2026	2028	2028	Relay, Breaker 2 Devices	Planning model version 1
5R76	0.27			Fuel/ Terrain	[redacted]		2026	2028	2028	Relay 1 Device	Planning model version 1
5R82	0.72			Fuel/ Terrain	[redacted]		2025	2028	2028	Relay, Breaker 2 Devices	Planning model version 1
5R98	0.71			Fuel/ Terrain	[redacted]		2025	2028	2028	Relay, Breaker 2 Devices	Planning model version 1
5R99	0.87			Fuel/ Terrain	[redacted]		2025	2028	2028	Relay, Breaker 2 Devices	Planning model version 1
5U1	0.86			Fuel/ Terrain	[redacted]		2023	2028	2028	Relay 1 Device	Planning model version 1
5U125	Circuit not evaluated in model version 1				[redacted]		2023	2028	2028	Relay 1 Device	Circuit not evaluated in model version 1
5U15	0.80			Fuel/ Terrain	[redacted]		2023	2028	2028	Relay, Breaker 2 Devices	Planning model version 1
5U17	0.91			Wind	[redacted]		2023	2028	2028	Relay 1 Device	Planning model version 1

Circuit ID/ ZOP ID	Risk Score Prior to Mitigation	Risk Score Post to Mitigation	RSE Score	Historic Ignition Driving Risk[18]	Capital Investment Costs ($1,000)	Operation and Maintenance Costs ($1,000)	Target Date for Engineering Completion	Target Date for Construction	Target Date for Completion	Mitigation Type and Units	Comments
5U19	0.82			Fuel/ Terrain	[redacted]		2023	2028	2028	Relay, Breaker 2 Devices	Planning model version 1
5U2	Circuit not evaluated in model version 1				[redacted]		2023	2028	2028	Relay 1 Device	Circuit not evaluated in model version 1
5U23	0.66			Fuel/ Terrain	[redacted]		2023	2028	2028	Relay 1 Device	Planning model version 1
5U3	0.85			Fuel/ Terrain	[redacted]		2023	2028	2028	Relay 1 Device	Planning model version 1
5U48	0.72			Fuel/ Terrain	[redacted]		2024	2028	2028	Relay 1 Device	Planning model version 1
5U49	0.88			Fuel/ Terrain	[redacted]		2024	2028	2028	Relay 1 Device	Planning model version 1
5U50	0.83			Fuel/ Terrain	[redacted]		2023	2028	2028	Relay 1 Device	Planning model version 1
5U89	0.84			Fuel/ Terrain	[redacted]		2024	2028	2028	Relay, Breaker 2 Devices	Planning model version 1
Dowell Substation	Substation risk not evaluated				[redacted]		2025	2028	2028	Relay 1 Device	Substation risk not evaluated
Riddle/Veneer Substation	Substation risk not evaluated				[redacted]		2023	2028	2028	Relay 1 Device	Substation risk not evaluated

Appendix F – Community Outreach and Public Awareness Surveys

Wildfire Customer Surveys

The overall objective of this research was to measure the public's awareness of messaging related to wildfire preparedness and safety. This study was conducted using a mix of online and phone surveys provided to customers in English and Spanish. A total of 2,606 surveys, including 86 from critical customers, were completed between September 30 and October 13, 2025 (Phone: 85; Web: 2,521).

Wildfire Safety Communications Awareness

- Just under seven in 10 (69%) say they have seen or heard communications about wildfire safety in the past year, significantly higher than was reported in April 2025 (57%).
- Communication recallers are significantly more likely than non-recallers to be homeowners and age 65+.
- Customers in the Central Oregon, Hood River, and Southern Oregon regions are more likely to be aware of communications.

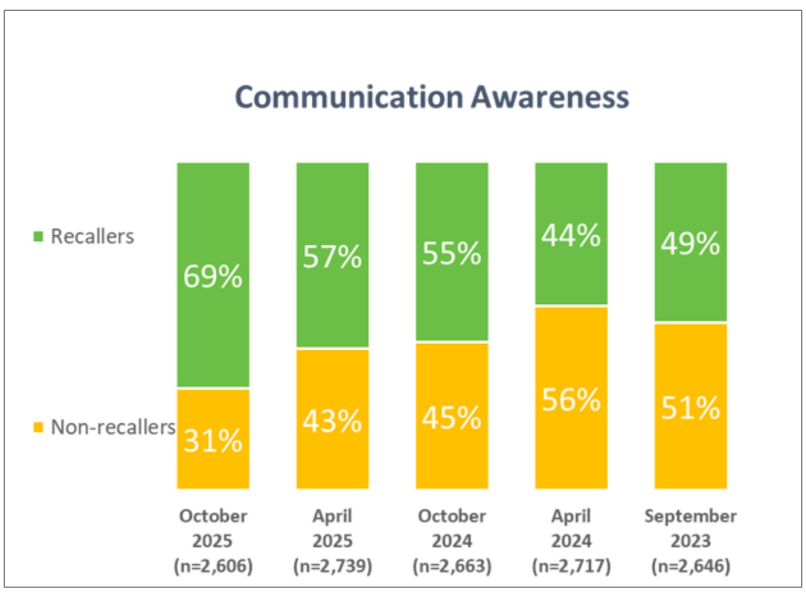


Figure F-1: Communication Awareness

Information Sources

Sources of Wildfire Preparedness Communications

- PacifiCorp saw a significant increase compared with April 2025 and remains the most commonly mentioned source of wildfire preparedness communication (43%), followed by news/media (10%).
- PacifiCorp is recalled by a higher percentage of customers in Hood River and Northeast Oregon.
- Customers age 18-44 (55%) and 45-64 (47%) are significantly more likely to mention PacifiCorp when compared with those age 65+ (38%).

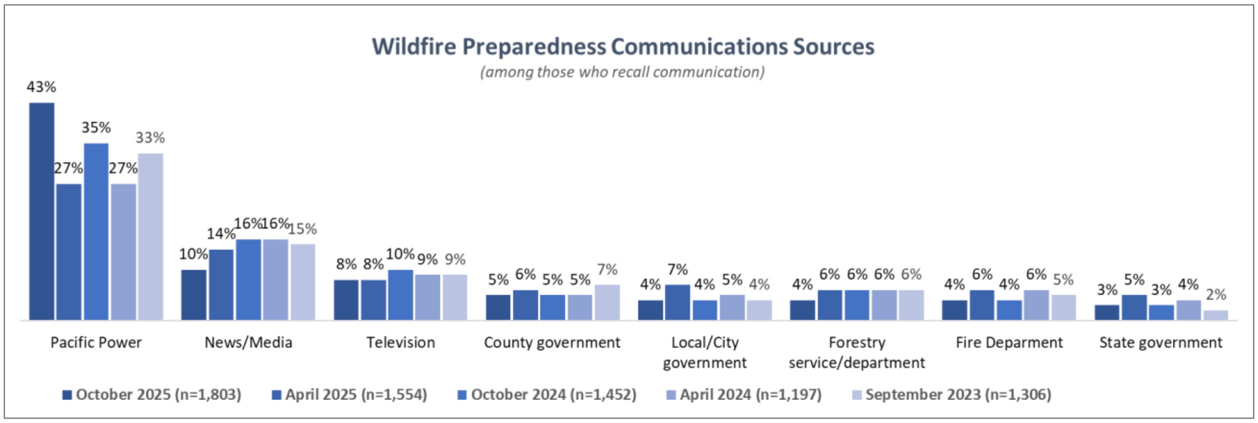


Figure F-2: Wildfire Preparedness Communications Sources

Wildfire Preparedness Communications Messages

- Of those who recall communications (recallers), just under six in 10 recall messages about personal preparedness (59%), consistent with last wave.
- Mentions of PSPS, PacifiCorp's WMP, ESS, and emergency de-energization increased significantly since April.
- Mentions of vegetation management, medical needs, fire high consequence areas, and offering medical backup electrical power rebate program saw significant decreases.

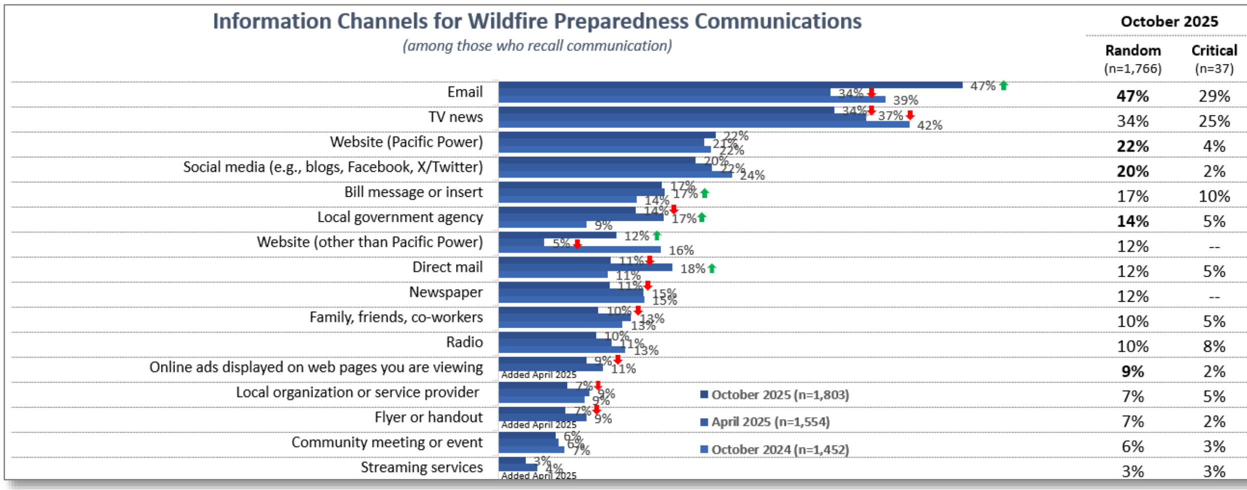


Figure F-3: Information Channels for Wildfire Preparedness Communications

Information Usefulness and Clarity

- The Company website remains the highest rated in terms of clarity (90%), followed by bill message or insert (85%).
- With respect to usefulness, community meetings or events remain rated most useful (82%), followed by the Company website (81%).

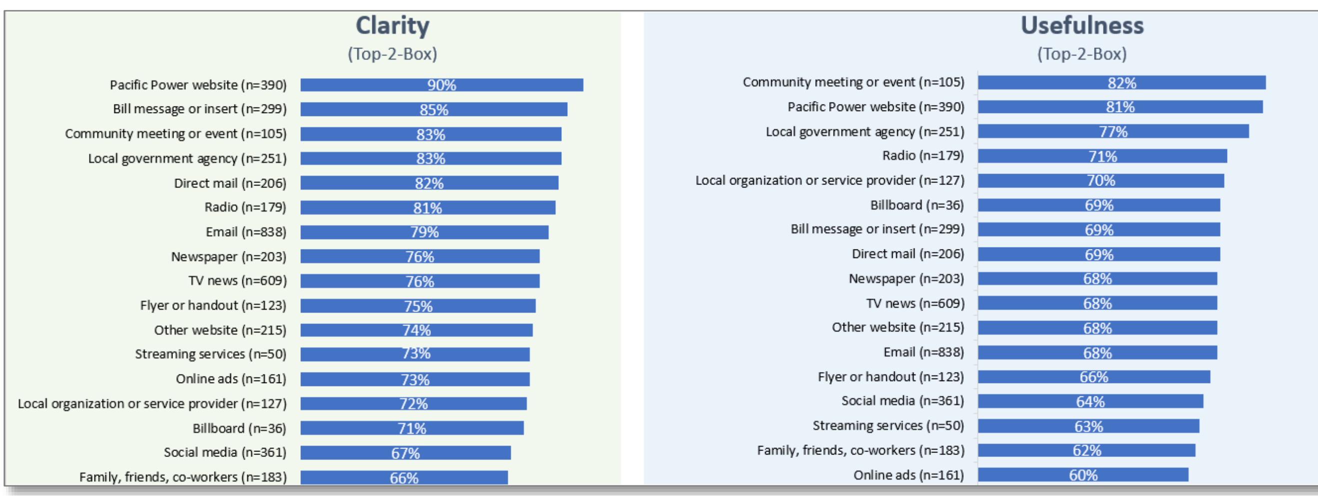


Figure F-4: Information Usefulness and Clarity

Communication Frequency

- Respondents say they most frequently see or hear messages about wildfire preparedness from family, friends, co-workers, radio, TV news, and streaming services.

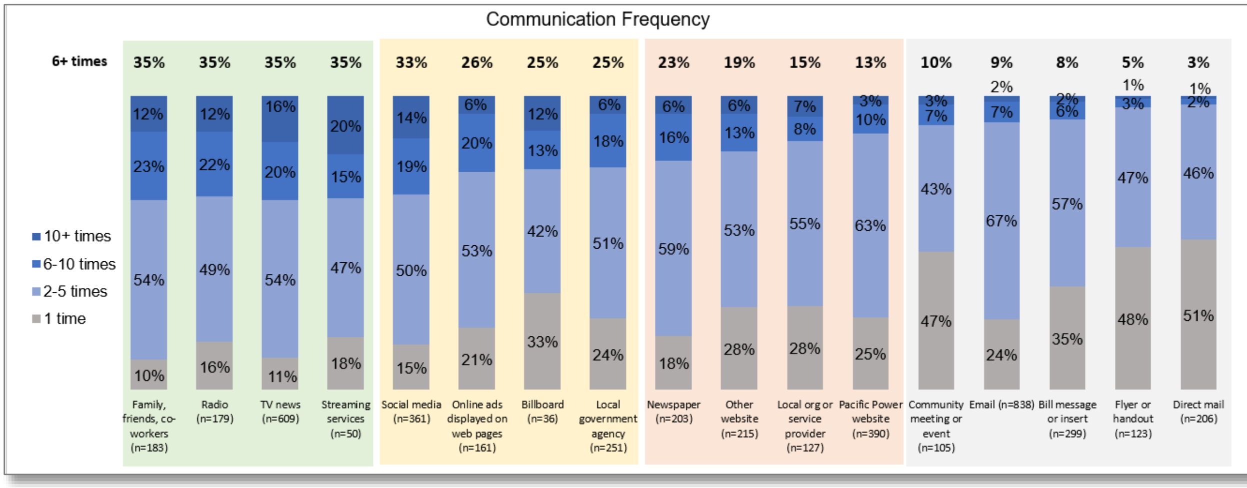


Figure F-5: Communication Frequency

Effectiveness of PacifiCorp Communication Methods

- Almost half (46%) say notification via text is the most effective method of communication from PacifiCorp.
- Critical customers are significantly more likely than random customers to say notifications via phone is most effective (21% vs. 11%).

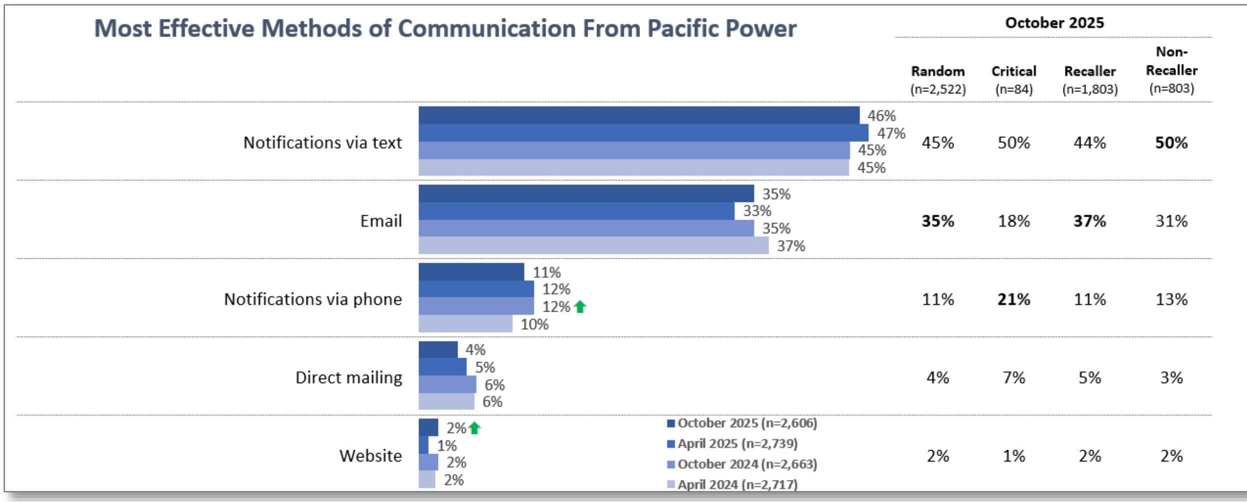


Figure F-6: Most Effective Methods of Communication

Helpful Communication Resources

- The most helpful resources remain larger font, audio recordings of written text, and captioning.
- Just under three in four report that none of the potential communication resources would be helpful.

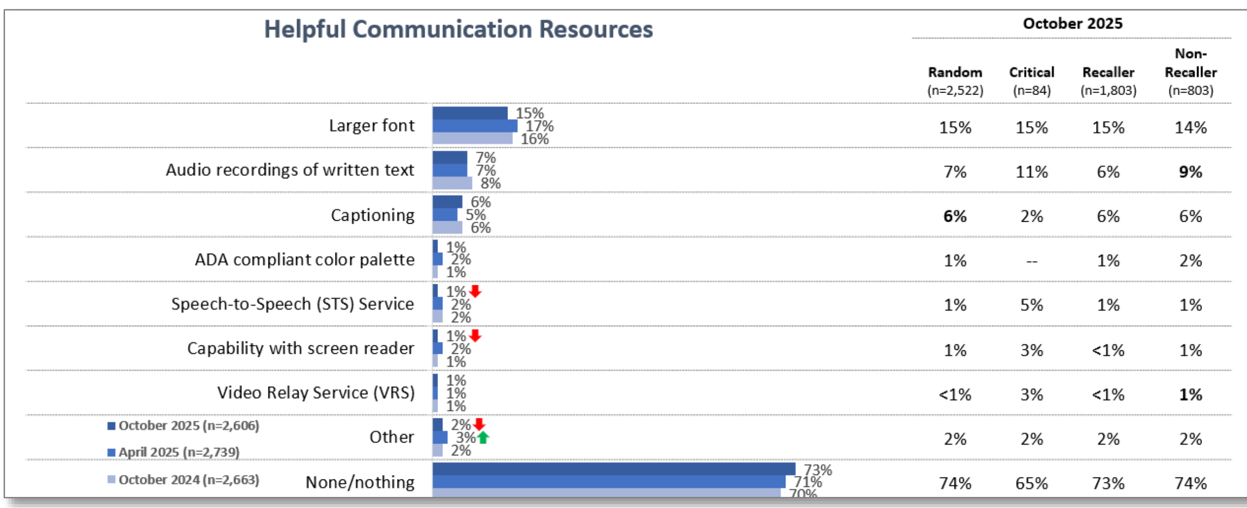


Figure F-7: Helpful Communication Resources

Awareness and Use of PacifiCorp Information

- Just over half (53%) are aware they can contact PacifiCorp for wildfire safety information, significantly higher than reported in April 2025 (44%).

- Of those aware, only 4% have contacted PacifiCorp for wildfire safety information.
- Among those who have contacted, vegetation management is the most common topic discussed, and 85% report they received the information needed.

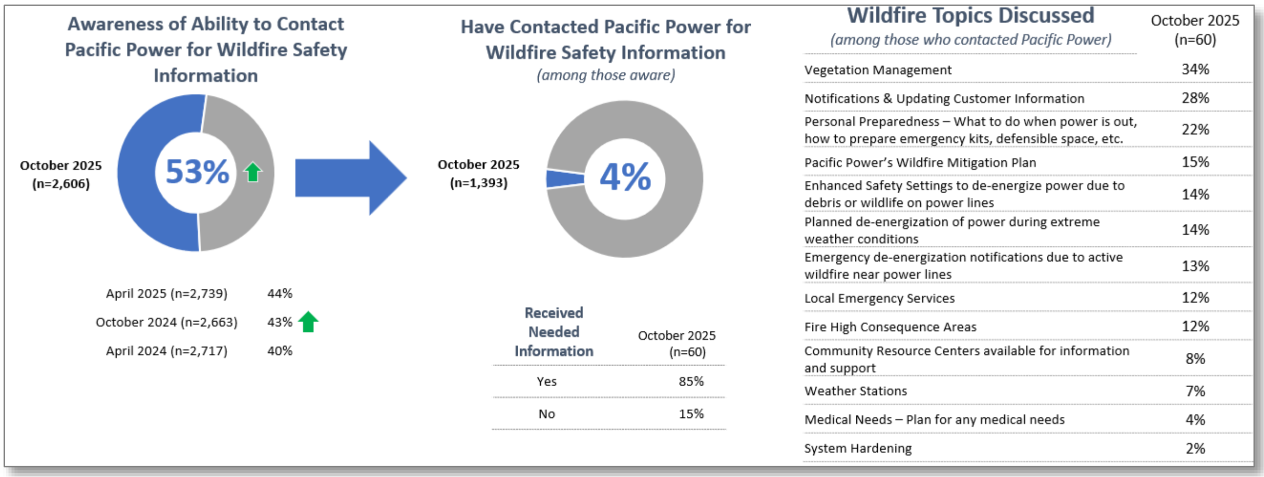


Figure F-8: Awareness and Use of PacifiCorp Information

Wildfire Prevention and Preparedness Actions Taken

Wildfire Preparedness

- Just over half say they have taken actions to prevent or prepare their home or business in the event of a wildfire, a significant increase over April 2025; recallers are significantly more likely than non-recallers to say they have taken actions (60% vs. 31%).
- Customers in Central Oregon, Southern Oregon, and Willamette Valley South are significantly more likely to indicate they took action compared with the statewide average.
- Critical customers are significantly more likely than random customers to say they installed watering systems (25% vs. 9%).

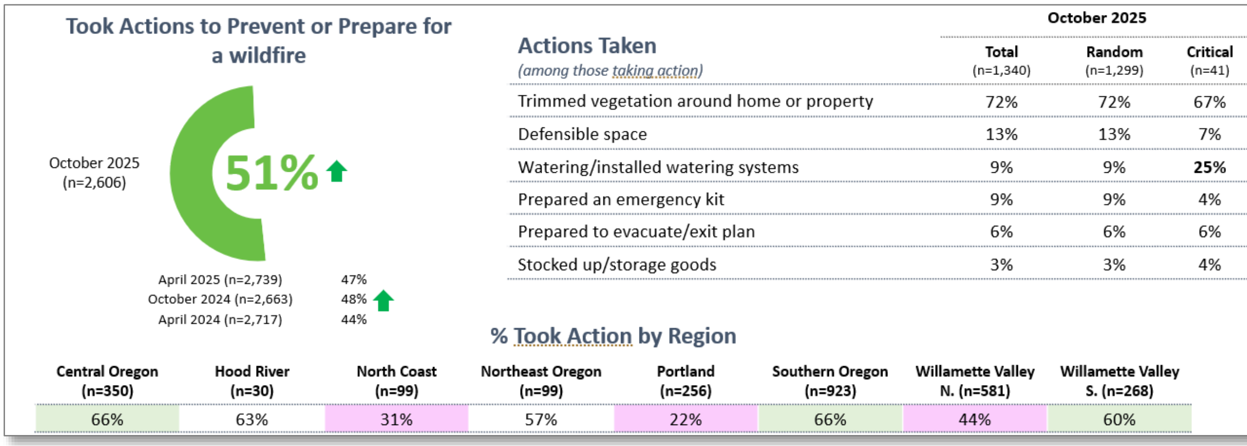


Figure F-9: Wildfire Preparedness

Awareness of PacifiCorp's Efforts

- PacifiCorp pruning vegetation around power lines in high-risk areas remains the most recalled effort and saw a significant increase when compared with April 2025.
- Recallers and those who took actions to be prepared for wildfires are significantly more likely than non-recallers and those who did not take actions to be aware of all of PacifiCorp's efforts to reduce the risk of wildfire shown below.

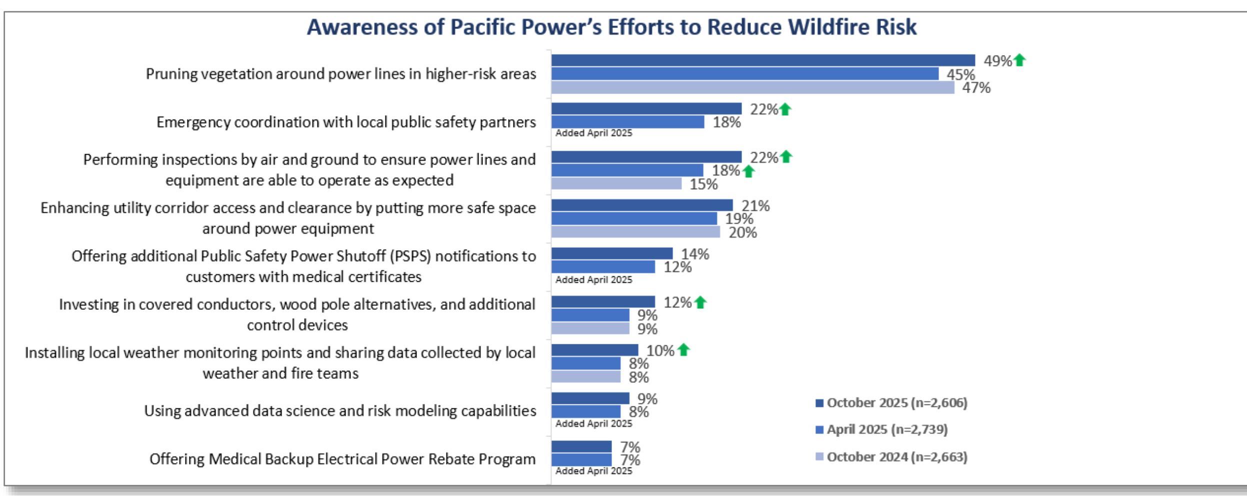


Figure F-10: Awareness of PacifiCorp's Efforts to Reduce Wildfire Risk

Awareness of Public Safety Power Shutoff

De-energization Awareness

- Just under eight in 10 customers (78%) are aware PacifiCorp may de-energize power lines during wildfire season, a significant increase when compared with April 2025.
- Recallers are significantly more likely to be aware than non-recallers (87% vs. 56%).
- Random customers are significantly more likely than critical customers to be aware (78% vs. 57%).

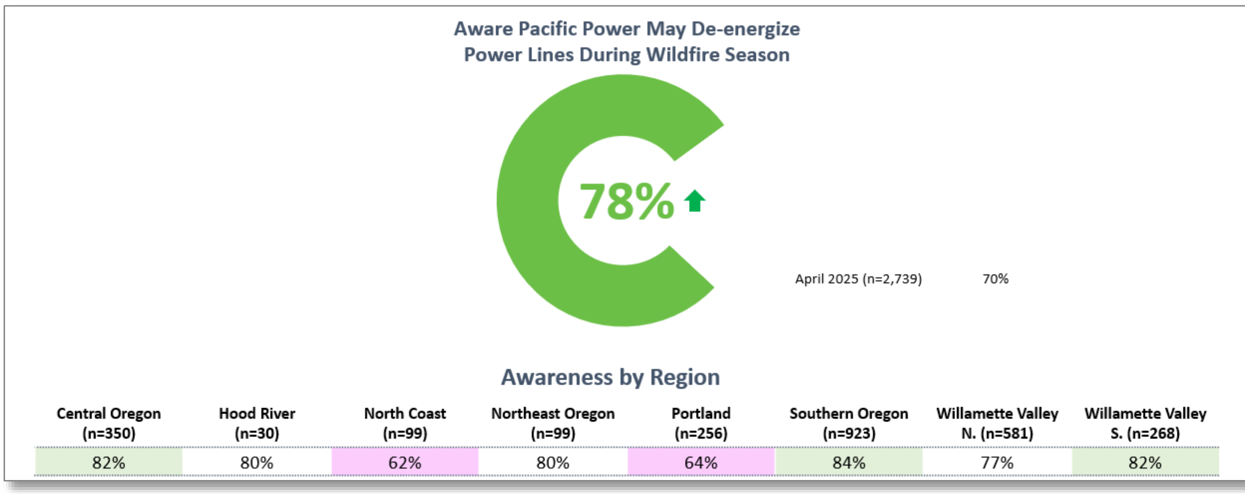


Figure F-11: Aware PacifiCorp May De-energize Power Lines During Wildfire Season

PSPS Phase Awareness

- Just over four in 10 (41%) customers encountered the phrase "Public Safety Power Shutoff" over the past year, significantly higher than was reported in April 2025; just under half (46%) do not recall any of the de-energization phrases.
- Recallers are significantly more likely than non-recallers to have encountered all three phrases over the past year.

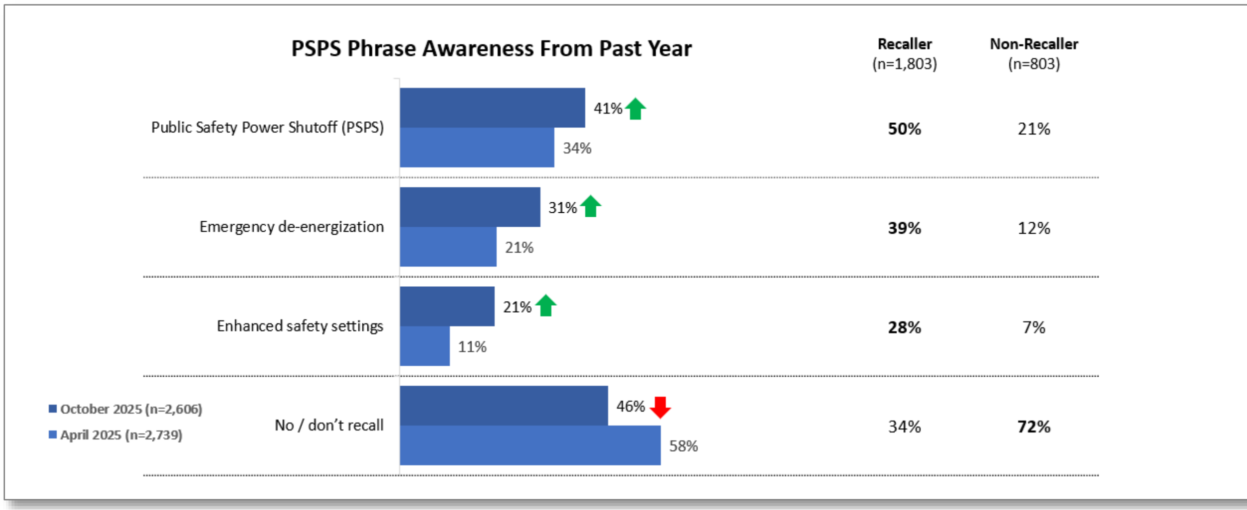


Figure F-12: PSPS Phrase Awareness from Past Year

De-energization Communication

- Just under four in 10 indicate seeing or hearing about de-energization information related to wildfire conditions from email, up significantly from April 2025.
- In addition to email, other websites saw a significant increase from April; random customers are significantly more likely than critical customers to mention email, radio, family, friends, or co-workers, newspaper, and other websites as sources of this communication.
- Mentions of TV news, radio, newspaper, and local government agency as sources of communication saw significant decreases from April 2025.

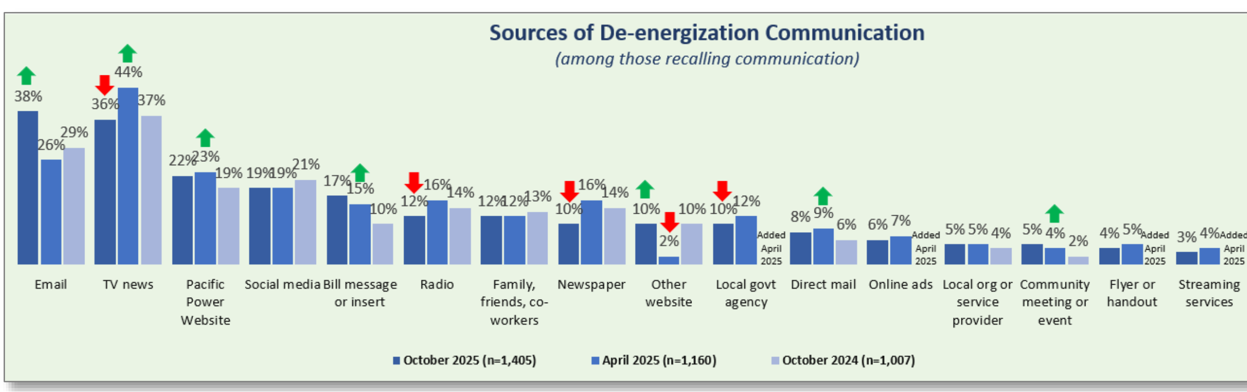
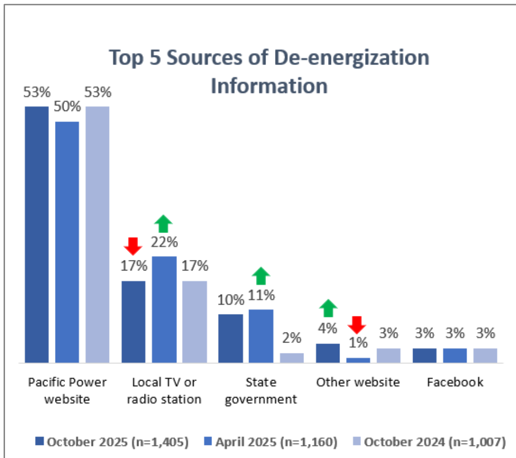


Figure F-13: Sources of De-energization Communication

PSPS Awareness and Understanding

- The Company website remains the main source customers turn to for information about de-energization (53%), consistent with April 2025.
- Of those aware, just over six in 10 (62%) understand the following statement about PSPS: "For areas at a higher risk of fast-spreading catastrophic wildfires, the utility will proactively shut off power during extreme and dangerous weather," up significantly from April 2025 (53%).

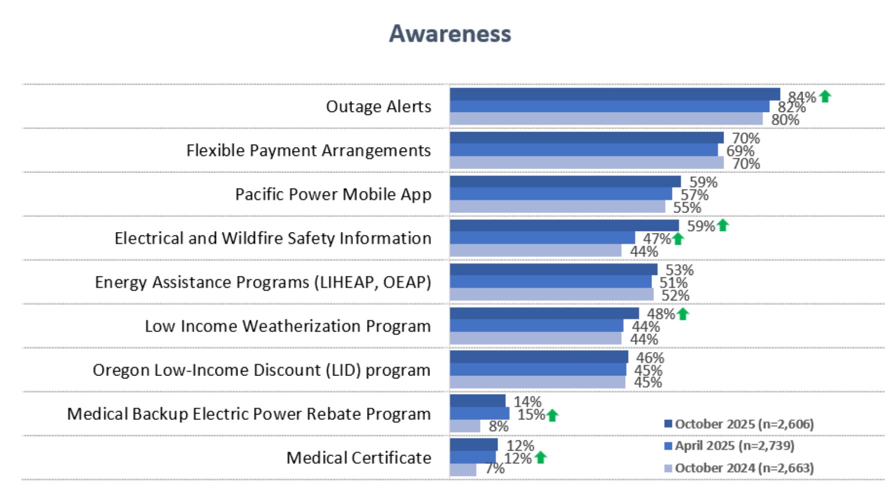


PSPS Understanding	Oct. 2025 (n=2,606)	April 2025 (n=2,739)	Oct. 2024 (n=1,007)	October 2025 Random (n=2,522)	October 2025 Critical (n=84)
For areas at a higher risk of fast-spreading catastrophic wildfires, the utility will proactively shut off power during extreme and dangerous weather.	62% ↑	53% ↓	75%	62%	**72%**
A Public Safety Power Shutoff is a last resort by the utility in an effort to prevent a fast-moving, hard to fight wildfire to help ensure customer and community safety.	43% ↑	39% ↓	47%	42%	**65%**
Before considering a Public Safety Power Shutoff the utility assesses several factors: dry trees and other fuel, winds, extremely low humidity, weather conditions, population density, real-time on-the-ground observations and input from local public safety and health agencies.	43% ↑	38% ↓	53%	43%	**61%**
The likelihood of a Public Safety Power Shutoff is reduced when the utility takes steps to harden the electric grid.	29% ↑	22% ↓	31%	28%	**58%**
Taking steps to enhance situational awareness by tracking satellite information and monitoring weather conditions can reduce the likelihood of a Public Safety Power Shutoff.	24% ↑	20% ↓	23%	23%	**55%**

Figure F-14: De-energization Awareness and PSPS Understanding

Awareness of Resources

- Just over eight in 10 (84%) indicate they are aware of outage alerts, significantly higher than in April 2025 (82%), followed by seven in 10 (70%) saying they are aware of flexible payment arrangements.
- Recallers are significantly more likely than non-recallers to say they are aware of all available resources.

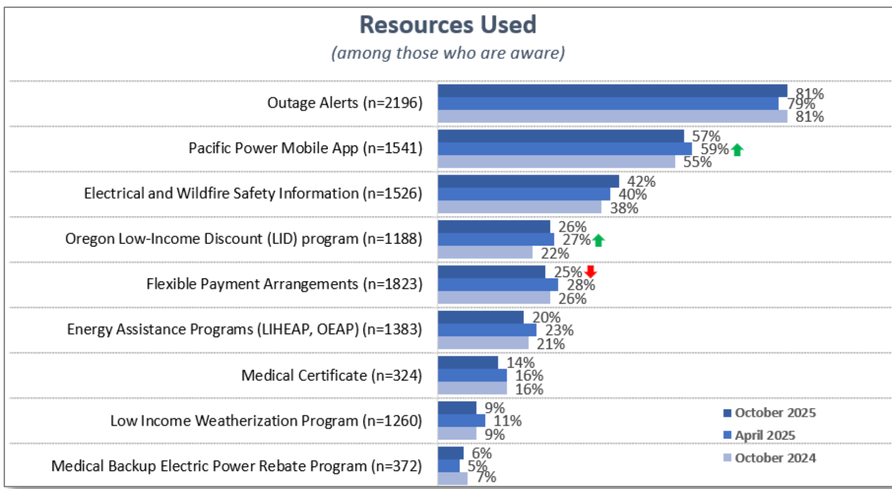


	October 2025			
	Random (n=2,522)	Critical (n=84)	Recaller (n=1,803)	Non-Recaller (n=803)
Outage Alerts	85%	76%	**88%**	75%
Flexible Payment Arrangements	69%	**86%**	**74%**	61%
Pacific Power Mobile App	58%	60%	**62%**	52%
Electrical and Wildfire Safety Information	58%	62%	**73%**	26%
Energy Assistance Programs (LIHEAP, OEAP)	52%	**71%**	**58%**	42%
Low Income Weatherization Program	48%	**68%**	**53%**	37%
Oregon Low-Income Discount (LID) program	45%	**66%**	**49%**	37%
Medical Backup Electric Power Rebate Program	14%	**32%**	**17%**	8%
Medical Certificate	11%	**45%**	**14%**	9%

Figure F-15: Awareness of Resources

Resources Used

- Of those aware of the various resources available, just over eight in 10 (81%) have used outage alerts, followed by just under six in 10 (57%) who have used the PacifiCorp mobile app; awareness of flexible payment arrangements saw a significant decrease since April 2025 (25% vs. 28%).
- Customers who indicate they rely on electricity for medical needs are significantly more likely than those who do not to have used seven of the nine resources.



	October 2025			
	Random	Critical	Recaller	Non-Recaller
Outage Alerts (n=2196)	**81%**	66%	**82%**	77%
Pacific Power Mobile App (n=1541)	57%	60%	57%	**58%**
Electrical and Wildfire Safety Information (n=1526)	42%	52%	**46%**	20%
Oregon Low-Income Discount (LID) program (n=1188)	25%	**44%**	24%	**32%**
Flexible Payment Arrangements (n=1823)	24%	**50%**	23%	**30%**
Energy Assistance Programs (LIHEAP, OEAP) (n=1383)	19%	**46%**	18%	**27%**
Medical Certificate (n=324)	9%	**51%**	12%	**22%**
Low Income Weatherization Program (n=1260)	8%	**26%**	9%	9%
Medical Backup Electric Power Rebate Program (n=372)	5%	**27%**	6%	8%

Figure F-16: Resources Used

Familiarity with Resources

- Just over four in 10 (45%) report that they have not investigated the resources, consistent with April 2025 (43%).
- Recallers are significantly more likely than non-recallers to report they have no need for resources, are familiar with resources, and the information was helpful.
- Random customers are significantly more likely than critical customers to report they have not investigated the resources (45% vs. 31%).

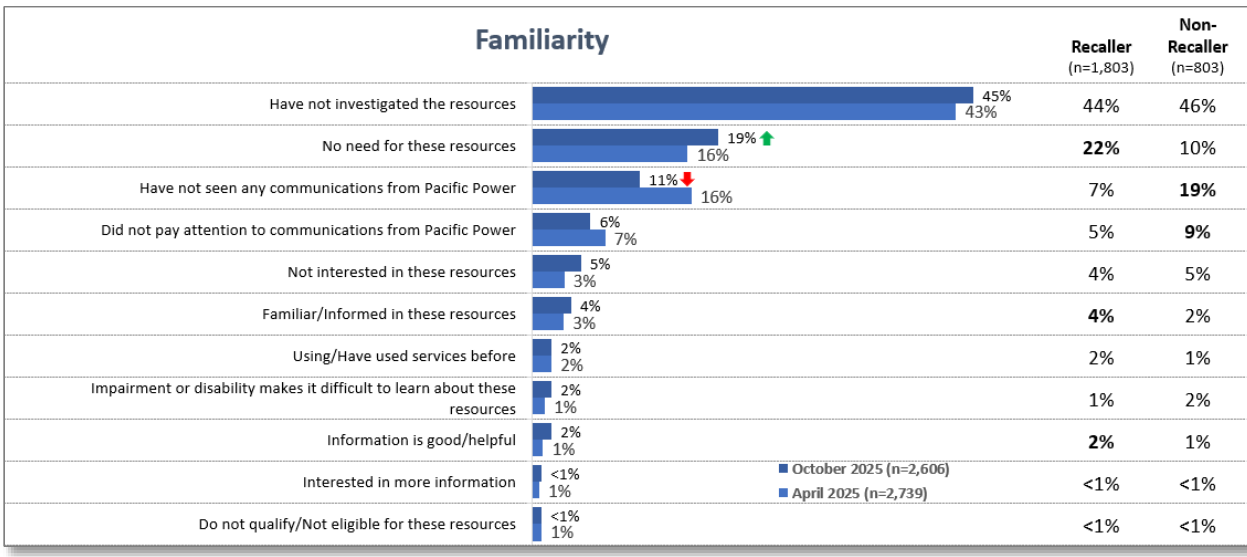


Figure F-17: Familiarity with Resources

Satisfaction with Resources Used

- Among those using the various resources available, satisfaction is highest with the Oregon Low-Income Discount program, medical certificate, and flexible payment arrangements.
- Satisfaction with energy assistance programs and the PacifiCorp mobile app saw significant decreases compared with April 2025.

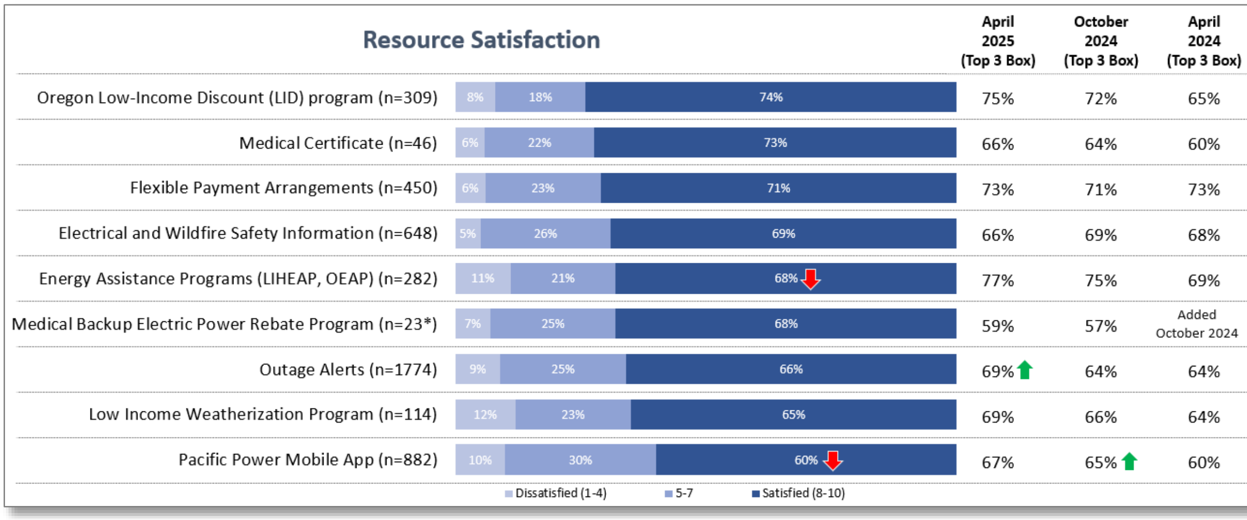


Figure F-18: Satisfaction with Resources Used

Contact Information

Contact Information for PSPS

- Eight in 10 (80%) customers are aware they can update their contact information with PacifiCorp, up significantly from April 2025 (72%); awareness among recallers is significantly higher than with non-recallers (85% vs. 70%).
- Just over four in 10 (42%) of those aware they can update their information have done so, significantly higher than reported in April 2025 (39%).

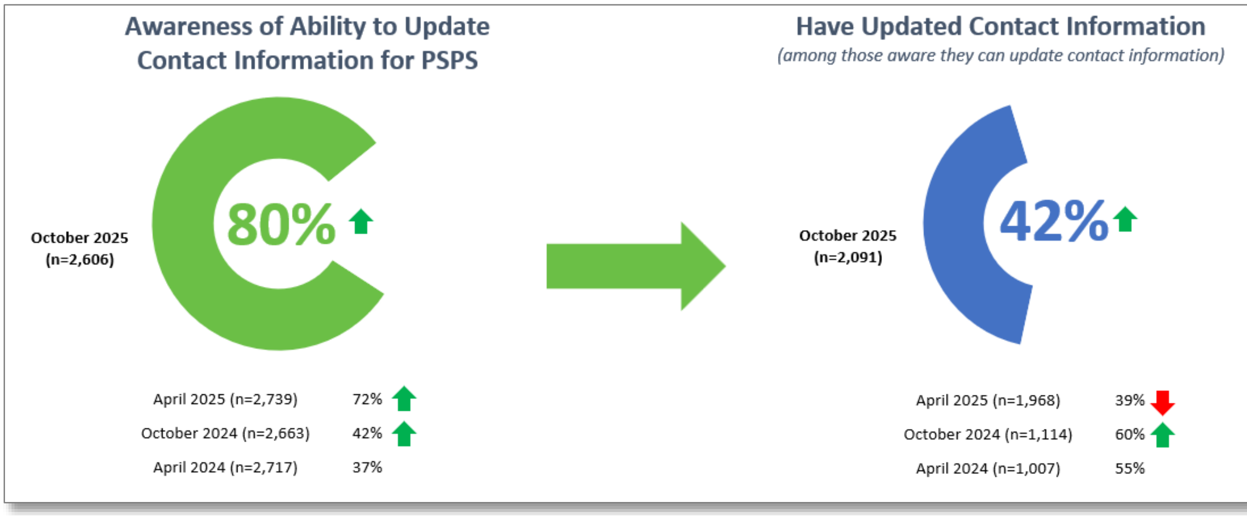


Figure F-19: Contact Information for PSPS

Notification Preferences for PSPS

- Just over three in four (77%) customers are aware they can update their notification preferences with PacifiCorp, up significantly from April 2025 (73%); awareness among recallers is significantly higher than with non-recallers (83% vs. 65%).
- Just under half (48%) of those aware they can update their preferences have done so, up significantly from April 2025 (43%).

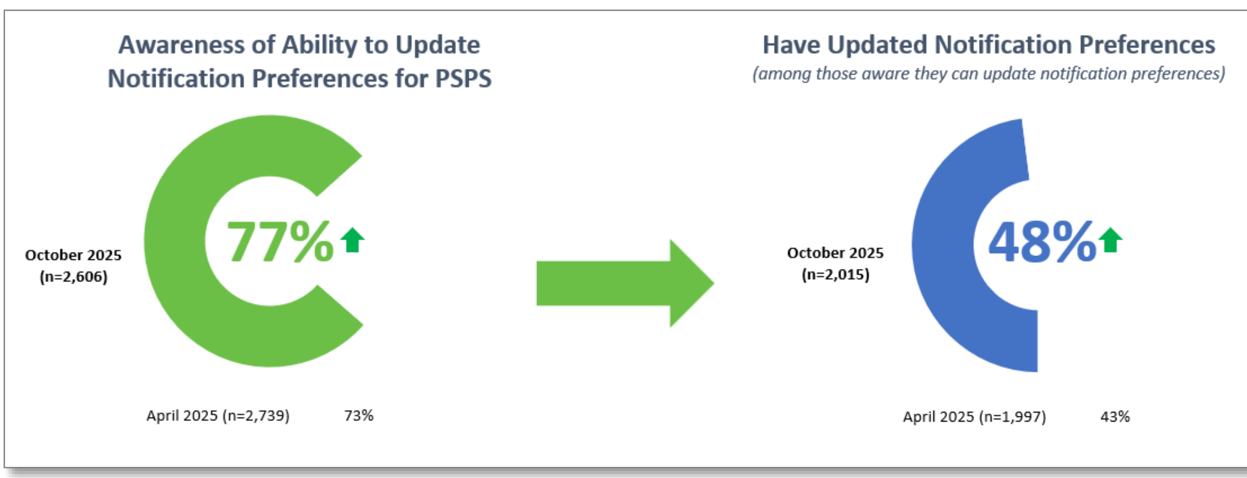
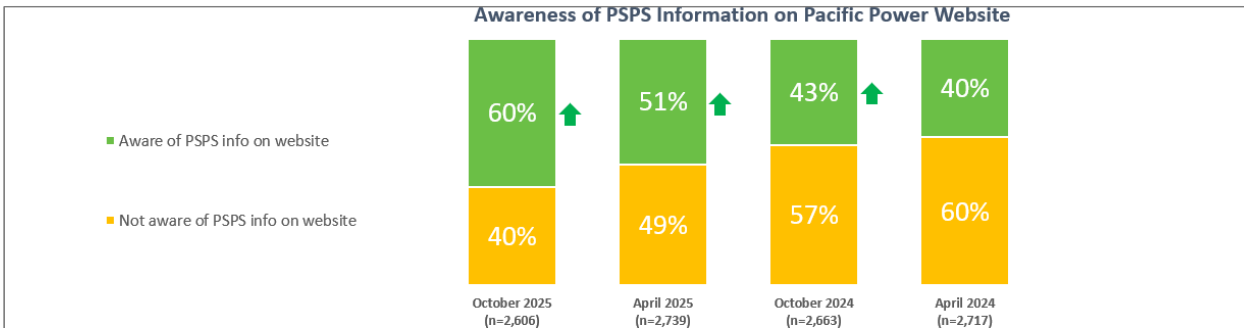


Figure F-20: Notification Preferences for PSPS

Awareness of PSPS Information Source

- Six in 10 (60%) are aware they can find PSPS information on the Company's website, up significantly from April 2025; awareness among recallers is significantly higher than among non-recallers (67% vs. 44%).
- Customers who do not rely on electricity for medical needs and non-AFN customers are significantly more likely to be aware of PSPS info on the website than those relying on electricity and AFN customers (61% vs. 56% and 62% vs. 55%, respectively).
- Awareness in Portland is significantly lower than the statewide average.



Awareness of PSPS Information on Pacific Power Website by Region

Total (n=2,606)	Central Oregon (n=350)	Hood River (n=30)	North Coast (n=99)	Northeast Oregon (n=99)	Portland (n=256)	Southern Oregon (n=923)	Willamette Valley N. (n=581)	Willamette Valley S. (n=268)
60%	61%	73%	60%	63%	50%	62%	61%	64%

Figure F-21: Awareness of PSPS Information

De-energization Notifications

- During the past year, just under one in four (23%) indicate being notified by PacifiCorp about a PSPS or other wildfire-related de-energization event, up significantly from April 2025 (12%).
- Recallers are significantly more likely than non-recallers to say they were notified (29% vs. 11%).

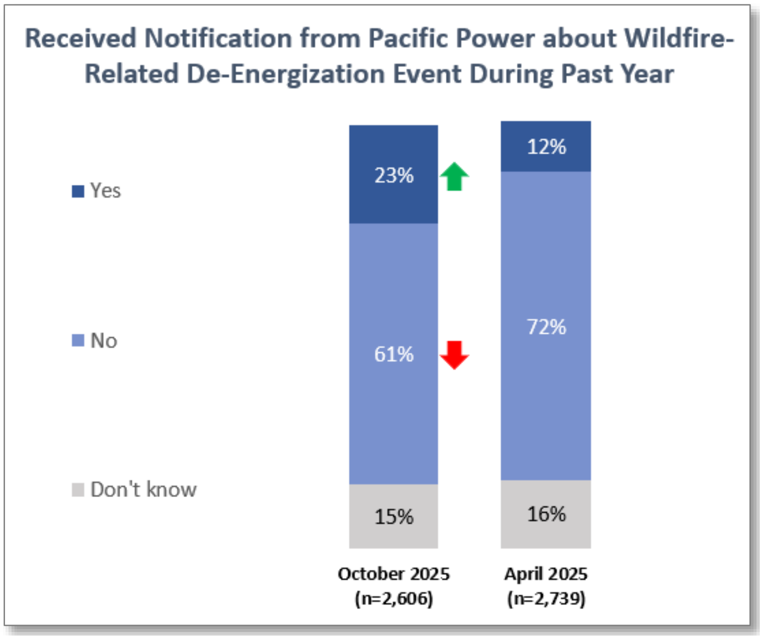


Figure F-22: De-energization Notifications

Concerns During Extended Outage

- Heating/cooling and food replacement remain the biggest concerns during an extended power outage, followed by communication.
- Random customers are significantly more likely than critical customers to mention heating/cooling (73% vs. 54%) and communication (44% vs. 31%).
- Concerns with food replacement, shelter, and powering medical equipment saw significant decreases when compared with April 2025.

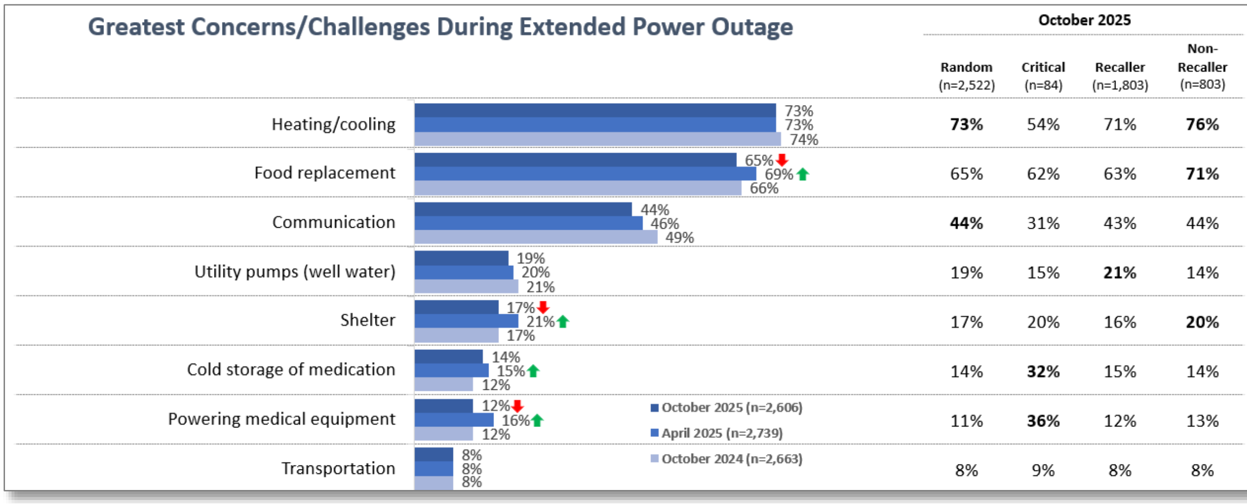


Figure F-23: Concerns During Extended Outage

Outreach and Engagement Satisfaction

- Roughly four in 10 customers report being satisfied with each of the statements about outreach and engagement
- Satisfaction with all statements about outreach and engagement saw a significant increase when compared with April 2025, continuing the trend of improvement since April 2024.
- Recallers and critical customers report significantly higher satisfaction with all statements about outreach and engagement than their counterparts.

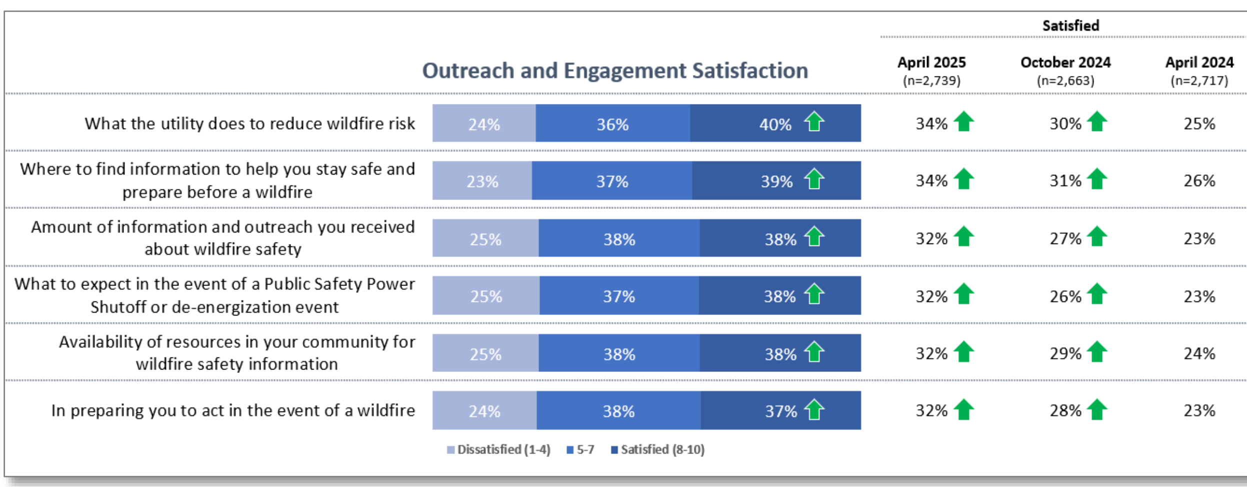


Figure F-24: Outreach and Engagement Satisfaction

Access and Functional Needs Customers

Self-identified AFN Status

- Just over one in four (26%) say someone in their household relies on electricity for medical needs or equipment, or is at increased risk of harm to health, safety, or independence during a power outage, down significantly from April 2025 (29%).
- Question wording was modified in April 2025 to reduce the likelihood of false positives for AFN; comparison with the previous wave indicates that previous percentages of customers self-identified as AFN were inflated.
- Critical customers are significantly more likely than random customers to say someone in their household is at an increased risk of harm during a power outage (59% vs. 25%).

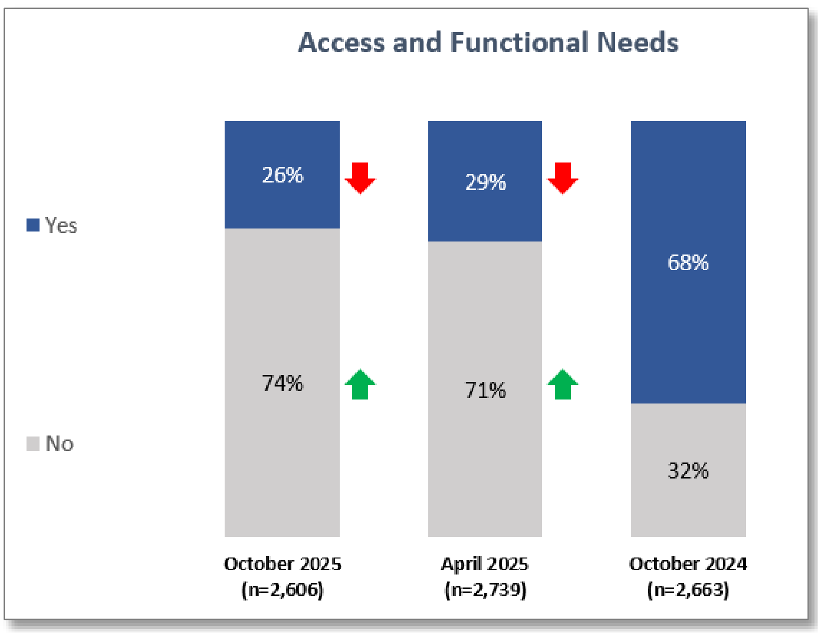


Figure F-25: Access and Functional Needs

Medical Needs and Language Preferences

- One-fifth (19%) responded that they rely on electricity for medical needs; critical customers are significantly more likely than random customers to rely on electricity for medical needs (53% vs. 18%).

- Of those relying on electricity for medical needs, 37% were able to use electricity dependent medical equipment during the de-energization event; of the 63% who were unable to use their equipment, lack of backup power source (78%) was cited as primary reason why.
    - Of those relying on electricity for medical needs, 22% are aware PacifiCorp provides additional notices, consistent with findings from April 2025 (21%).
- English is not a primary language for one in eight customers (12%) but is still preferred for communications for the vast majority (99%).
    - Out of all respondents, only 2% say it would be helpful for them or someone in their household to receive communication in another language.
    - When asked what their preferred language would be to receive communications from PacifiCorp, Spanish was the most mentioned non-English language, identified by 17 people (1%).

Those with Increased Risk During an Outage

- Having someone in the household who is over the age of 62 remains the most common reason for increased risk during an outage, consistent with April 2025 (58%).
- Mentions of chronic conditions or injuries saw a significant decrease from April while mentions of powering medical equipment and being dependent on electricity to refrigerate medication saw significant increases.

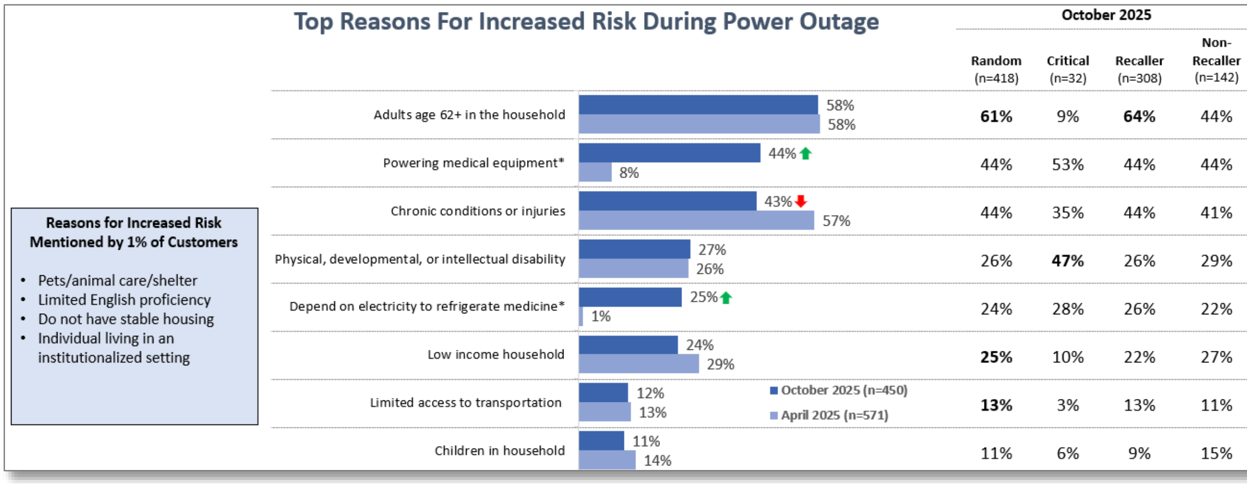


Figure F-26: Top Reasons for Increased Risk During Power Outage

Access and Functional Needs Resources

- Just over one in five (21%) AFN customers say they are aware that PacifiCorp looks to identify households with individuals who have an increased risk of harm to health, safety, and independence during a power outage in order to provide targeted communication and advanced notification, consistent with April 2025 (23%); critical customers are significantly more likely than random customers to say they are aware (35% vs. 20%).
- Just under three in 10 (28%) AFN or critical customers recall receiving direct communication from PacifiCorp; recallers are significantly more likely than non-recallers to say they received direct communication (34% vs. 13%).
- Roughly one in six (16%) AFN or critical customers say someone in the household engaged with local organizations, service providers or government agencies in the community outside of PSPS events, consistent with April 2025 (17%); recallers are significantly more likely than non-recallers to mention this (20% vs. 9%).

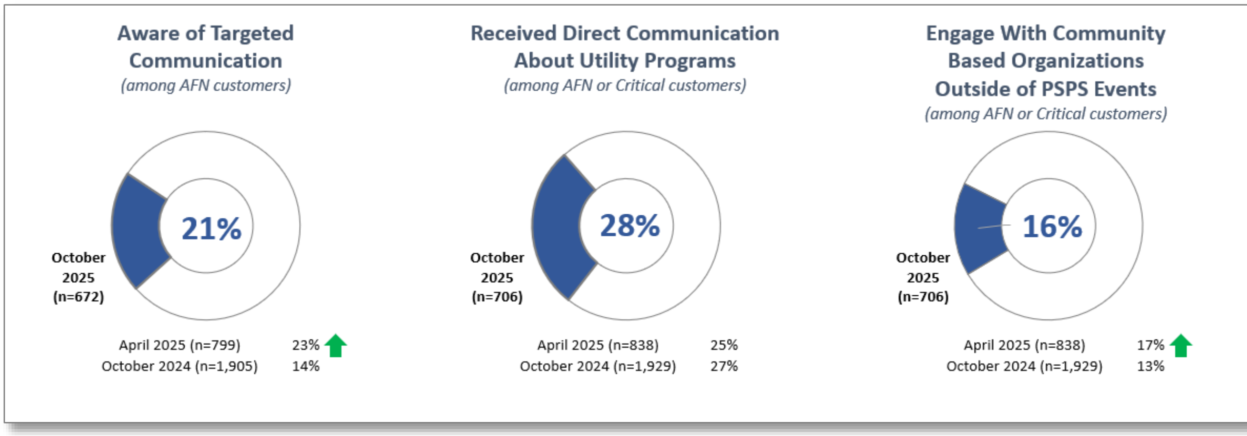


Figure F-27: AFN Resources

AFN Customers' Ability to Use Medical Equipment

- Among AFN customers, 37% were able to utilize electricity-dependent medical equipment during a de-energization event, consistent with April 2025 (34%).
- Not having a backup power source is the most common reason cited for not being able to use medical equipment, mentioned by 78% of AFN customers; backup power source running out of fuel saw a significant increase when compared with April 2025 (6% vs. 3%).

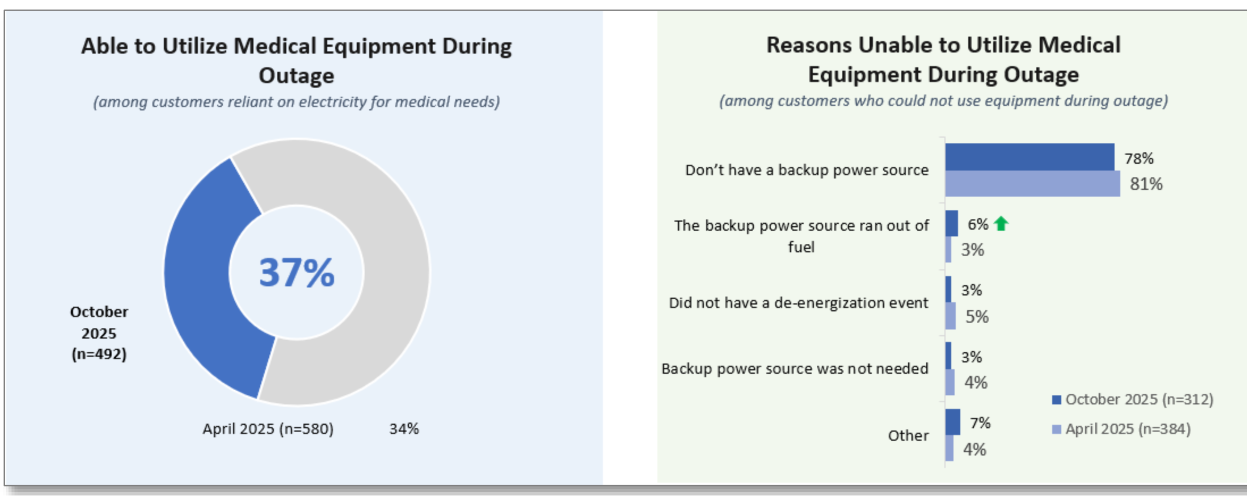


Figure F-28: AFN Customers' Ability to Use Medical Equipment

AFN Customers' Concerns and Resources

- AFN customers' biggest concerns with an extended power outage are heating/cooling and food replacement.
- Specific to wildfire-related resources, AFN customers are most likely to be aware of outage alerts (80%), followed by flexible payment arrangements (67%), the PacifiCorp mobile app (57%), electrical and wildfire safety information (46%), and energy assistance programs (52%); usage is considerably lower, with outage alerts most commonly used (65%).
- Not investigating resources (46%) and not seeing any communications from PacifiCorp (15%) are the biggest barriers to usage.

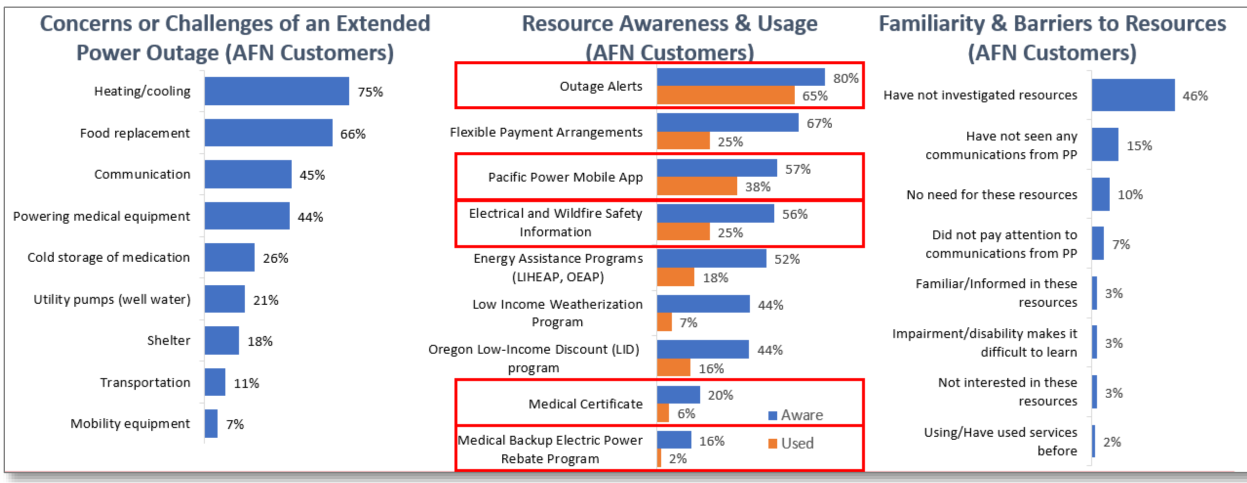


Figure F-29: AFN Customers' Concerns and Resources

Medical Certificate Usage

- Of the customers who rely on electricity for medical equipment, only 5% currently have an active Medical Certificate.
- 15% are aware that the Medical Certificate requires renewal, consistent with April 2025 (15%).
- 13% are aware that an active certificate would enable them to participate in the Medical Backup Electric Power Rebate Program, consistent with April 2025 (15%).
- Just under six in 10 (57%) of those with medical needs say the upfront cost of a backup power supply would prevent them from participating in the Medical Backup Electric Power Rebate Program, consistent with April 2025 (59%).

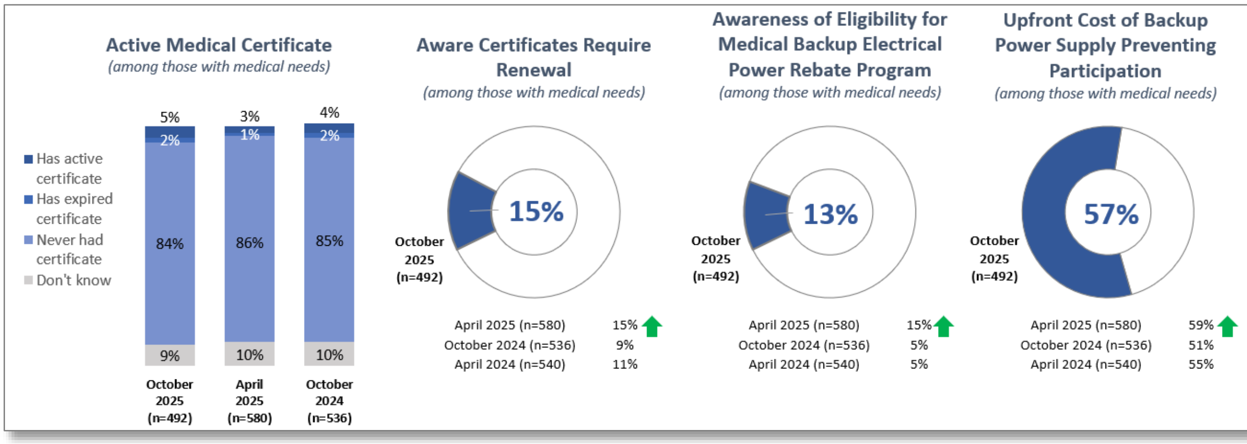


Figure F-30: Medical Certificate Usage

	Random Customers (n=2,522)	Critical Customers (n=84)
Aware of Wildfire Safety Communications	**70%**	44%
Aware of Communications from Pacific Power (among those aware)	43%	47%
Took Action to Prevent or Prepare for a Wildfire	52%	49%
Aware Pacific Power May De-energize Lines During Wildfire Season	**78%**	57%
Would Turn to Pacific Power Website for PSPS Info	53%	43%
Aware of Ability to Update Contact Info for PSPS	80%	74%
Aware of Ability to Update Notification Preferences	78%	69%
Satisfied with Availability of Resources in Community for Wildfire Safety Info	37%	**55%**
Aware of Additional PSPS Notices for Those with Medical Need (among those with medical need)	21%	**34%**

Figure F-31: Key Metrics: Random vs. Critical Customers

	Random Customers (n=2,522)	Critical Customers (n=84)
Gender	Male – 39% Female – 53%	Male – 33% **Female – 65%**
Age	18-54 – 20% 55-64 – 18% **65+ – 57%**	18-54 – 26% 55-64 – 26% 65+ – 41%
Median Income	$67K	$31K
Home Ownership	**Own – 80%** Rent – 15%	Own – 59% **Rent – 37%**
Primary Language is not English	12%	17%
Responded they Rely on Electricity for Medical Needs	18%	**53%**

Figure F-32 Demographic Profiles: Random vs. Critical Customers

	AFN Customers (n=799)	Non-AFN Customers (n=1,934)
Aware of Wildfire Safety Communications	70%	69%
Aware of Communications from Pacific Power (among those aware)	42%	43%
Took Action to Prevent or Prepare for a Wildfire	**56%**	50%
Aware Pacific Power May De-energize Lines During Wildfire Season	73%	**79%**
Would Turn to Pacific Power Website for PSPS Info	46%	**55%**
Aware of Ability to Update Contact Info for PSPS	77%	**81%**
Aware of Ability to Update Notification Preferences	73%	**79%**
Satisfied with Availability of Resources in Community for Wildfire Safety Info	35%	39%
Aware of Additional PSPS Notices to those enrolled in Medical Certificate Program (among those with medical need)	22%	--

Figure F-33: Key Metrics: AFN vs. Non-AFN

	AFN Customers (n=799)	Non-AFN Customers (n=1,934)
Gender	Male – 37% Female – 53%	Male – 40% Female – 54%
Age	18-54 – 23% 55-64 – 18% 65+ – 54%	18-54 – 19% 55-64 – 18% 65+ – 57%
Median Income	$55K	$69K
Home Ownership	Own – 71% **Rent – 21%**	**Own – 82%** Rent – 14%
Primary Language is not English	13%	11%
Responded they Rely on Electricity for Medical Needs	73%	--

Figure F-34: Demographic Profiles: AFN vs. Non-AFN

Post-PSPS

PSPS Notifications

- Half (50%) say that notifications should be sent if there is any possibility of a PSPS, significantly lower than April 2025 (54%).
- Just under four in 10 (39%) say notifications should only be sent if there is a high likelihood of a PSPS, up significantly from April 2025 (36%).
- Just over one in 10 (11%) say notifications should only be sent if a PSPS is certain to occur, consistent with last wave.

PSPS Notifications Perception	October 2025 (n=2,606)	April 2025 (n=2,739)	October 2024 (n=2,663)	April 2024 (n=2,717)	September 2023 (n=2,646)
Notifications should be sent if there is any possibility of a PSPS	50% ↓	54%	52%	54%	52%
Notifications should only be sent if there is a high likelihood of a PSPS	39% ↑	36%	37%	37%	38%
Notifications should only be sent if a PSPS is certain to occur	11%	9% ↓	11% ↑	8%	10%

Figure F-35: PSPS Notification Perception

Partner Interviews

A total of 12 in-depth interviews were conducted with CBOs and other partner organizations throughout Oregon. Interviews lasted 30 minutes and were conducted using Microsoft Teams. All interviews were recorded.

Table F-1: Partners Interviewed in Oregon in 2025

County	Agency	Position	Notes
Jackson	Firebrand Resiliency Collective - Talent & Phoenix	Director Firebrand Resiliency Collective	April 2025 Interview
Josephine	City of Cave Junction	Councilor, Cave Junction	April 2025 Interview
Klamath	Klamath County Chamber of Commerce	Executive Director, Klamath County Chamber of Commerce	April 2025 Interview
Linn	Linn County Public Health	Emergency Preparedness Manager	April 2025 Interview
Multnomah	Oregon Health and Sciences University	Director, Family to Family Health Information Centers for Oregon	April 2025 Interview
Statewide	Upstream Access	Executive Director, Upstream Access	April 2025 Interview
Benton	Oregon State University Extension Service	Associate Professor of Practice for Hood River & Wasco Counties, College of Health	October 2025 Interview
Josephine	Grants Pass Chamber	Grants Pass Chamber CEO	October 2025 Interview
Lane	Cottage Grove Public Works	Cottage Grove Public Works and Dev. Director	October 2025 Interview
Marion/Linn	Santiam Service Integration-Santiam Hospital	Santiam Service Integration Coordinator	October 2025 Interview
Umatilla	Umatilla County	Umatilla County Emergency Manager	October 2025 Interview
Wallowa	Wallowa Memorial Hospital (Enterprise, Oregon)	Wallowa Preparedness and Response Coordinator	October 2025 Interview

Current Communications

- Organizations interviewed have experienced strong communications with PacifiCorp. Through their representative, they report receiving helpful information, timely updates about outage events, and support for various educational and funding programs.
- Communication methods include in-person (such as attending events and collaborating on community projects), texts, calls, and direct emails. Additionally, organizations feel they have a person they can reach out to directly when they need information.

- Attending events, either partner or public-facing, is considered particularly helpful, and participants are pleased with the involvement they have seen from PacifiCorp. These events provide PacifiCorp the ability to connect directly with the community and partners to build trust and understanding.
- While the communications from PacifiCorp have been effective, partners would appreciate additional details regarding PSPS and other outage events. They want to better understand the criteria for an outage and the factors that go into decision-making, which will help them prepare their own staff as well as communicate with the community.
- Engagement with community leaders (local businesses, CBOs, government agencies) is seen as a powerful strategy for reaching the entire community, including those not reachable through direct methods.

Spreading the Word

- For emergency situations, partners encourage community members to sign up for emergency alerts, using systems such as Everbridge or Watch Duty. Additionally, direct text messages, social media, and traditional media (where available) are recommended to ensure people remain informed.
- For educational outreach outside of emergencies, effective strategies include email, social media, and printed materials or flyers. Engaging with the community at local events and maintaining regular contact with businesses, community leaders, and CBOs is considered a highly effective way to ensure the entire community stays informed.
- For those with medical needs, encouraging them to sign up for notifications, providing information about backup power options (either programs or just providing information about what they can do themselves) is critical. It is important to educate vulnerable groups about the risks of outages, what they can do, and what resources are available.
- Educational outreach related to fire season and PSPS can be done throughout the year and included in messaging about preparing for winter storms or other outages. A strong push is

recommended in the spring, particularly around vegetation management, which is more specific to fire season.

- English and Spanish are the primary languages for outreach, with Russian, Hmong, and Vietnamese also mentioned.

Useful Information/Resources

- PacifiCorp can best support the community by:
  - Communicating with partners as early as possible: Enable them to prepare their operations as well as be ready to answer questions from the public or share information.
  - Educating the public about PSPS: Explain what PSPS is, how it works (including the criteria for an event), and the reasons behind its implementation.
  - Sharing preparedness resources: Offer guidance and materials to help people prepare for PSPS or any outage, such as instructions for signing up for alerts, maintaining emergency supplies like water and food, and making arrangements for those who rely on medical equipment (including backup power solutions or resources).
- Help educate customers with medical needs about early notification options and support resources (such as backup power). Also consider partnering with CBOs and health organizations to provide information to those who have not contacted PacifiCorp directly or are unaware. Partners report challenges sharing information when it comes to eligibility for medical certificates, so it is recommended to collaborate to educate through word of mouth at any type of personal interaction (e.g., community events, visiting the doctor, or hospital).
- Continue to communicate the actions PacifiCorp has taken, and plans to take, to mitigate impacts, and highlight infrastructure investments to demonstrate that PacifiCorp is a partner in the local community.

PSPS Events

- Advance Notice: Notify partner organizations as early as possible and share as much information as possible about event probabilities and affected locations to support their planning efforts.
- Community Outreach: Use multiple channels to reach the community, including social media, email, TV/radio (where available), text messages, and automated calls. Collaborate with partners to spread information via word of mouth.
- Transparency and Updates: Provide timely, transparent notifications and frequent updates as conditions evolve. Early and consistent communication builds trust and keeps the community informed.
- Support and Vulnerable Groups: Educating vulnerable groups about the resources available to them and encouraging them to sign up for alerts and take actions to prepare themselves is critical. Partnerships with local businesses, CBOs, and government agencies, and attendance at events or community meetings can help reach people personally.
- Ongoing Education: Maintain year-round education and communication efforts about how to prepare for power outages, with a focus on fire-related outages in April and May. Continue regular reminders and communications throughout fire season and highlight the medical certificate and backup power resources.

Appendix G – Maturity Model Assessment

Overview

The mission of the International Wildfire Risk Mitigation Consortium (IWRMC) is to establish and facilitate a system of working and networking channels between members of the global utility community to support ongoing sharing of data, information, technology, and practices, and proactively address the wildfire issues through learning, innovation, analysis, assessment, and collaboration. As discussed in Section 14.2, PacifiCorp collaborates with utilities as an active member of the International Wildfire Risk Mitigation Consortium. IWRMC also administers the Wildfire Risk Mitigation Maturity Model, which was developed collaboratively among IWRMC member utilities. This survey is used to gather insights into the process, methodologies, tools, and standards used by utilities to support their wildfire risk mitigation activities.

PacifiCorp completed the 2025 Maturity Model survey through a collaborative, cross-functional review that drew on prior survey responses, subject matter expertise, and leadership input. The evaluation emphasized accuracy and evidence-based scoring, with subject matter experts from each functional area validating the components relevant to its operations. The Company's process ensured that all ratings reflected the current state of established practices, tools, and capabilities.

Self-Assessment

The 2025 assessment indicates steady overall improvement compared to the prior cycle, with notable advancements across several core capability areas. PacifiCorp's overall maturity score increased by more than **0.50 points** since the 2023 assessment, reflecting continued progress in the development of wildfire risk mitigation practices. Meaningful gains were observed in Risk Assessment & Mapping, Grid Design & System Hardening, and Resource Allocation & Methodology. While most capability areas showed incremental improvement, a few—particularly within Vegetation Management & Inspection—appear to plateau or show slight decreases. These results may reflect a more calibrated and evidence-based scoring approach in the current assessment cycle, rather than a decline in underlying performance. These areas will remain a focus for continuous improvements through process enhancements, technology integration, and strengthened coordination across operational teams. Looking ahead, PacifiCorp will use these assessment results to guide future investments, refine program strategies, and support maturation goals through 2026–2028, as well as to inform ongoing benchmarking efforts with IWRMC.

Table G-1: IWRMC Identified Capabilities and Planned Advancements 2026-2028

IWRMC Category	Capabilities	High-Level Approach	Timeline
Risk Assessment & Mapping	• Advanced ignition probability modeling • Risk spend efficiency modeling	Continuing to refine predictive modeling tools	2026–2028
Vegetation Management & Inspection	• Vegetation analytics and data management	Implementing work management software system to support better data integrity and improving processes for tracking and prioritizing maintenance work	2026
Resource Allocation & Methodology	• Organization design and skills alignment	Benchmarking of the wildfire mitigation structure, expansion of the team, and specialized training for the team	2026–2028

PacifiCorp is committed to continuous improvement in its wildfire mitigation strategy through regular evaluation, benchmarking, and strategic program refinement. Insights gained through IWRMC benchmarking and peer exchange will be used to validate findings and inform best practices. These results will guide updates to strategic wildfire risk mitigation initiatives, including improvements to risk models, internal processes, data reporting, and compliance, ensuring that mitigation efforts remain effective, transparent, and aligned with regulatory expectations.

Appendix H – Supporting Documentation for PacifiCorp's Risk Modeling

High Fire Risk Zone (HFRZ) Analysis

The HFRZ delineates the areas in the Company's service territory and rights-of-way with transmission assets that have the highest potential consequence of utility-associated wildfires. The underlying analysis generates a grid of 1-square-mile cells overlaid on the Company's service territory and rights-of-way. Grid cells containing utility assets are assessed for wildfire consequence and either included or excluded from the HFRZ according to the framework depicted in Figure H-1 and described below.

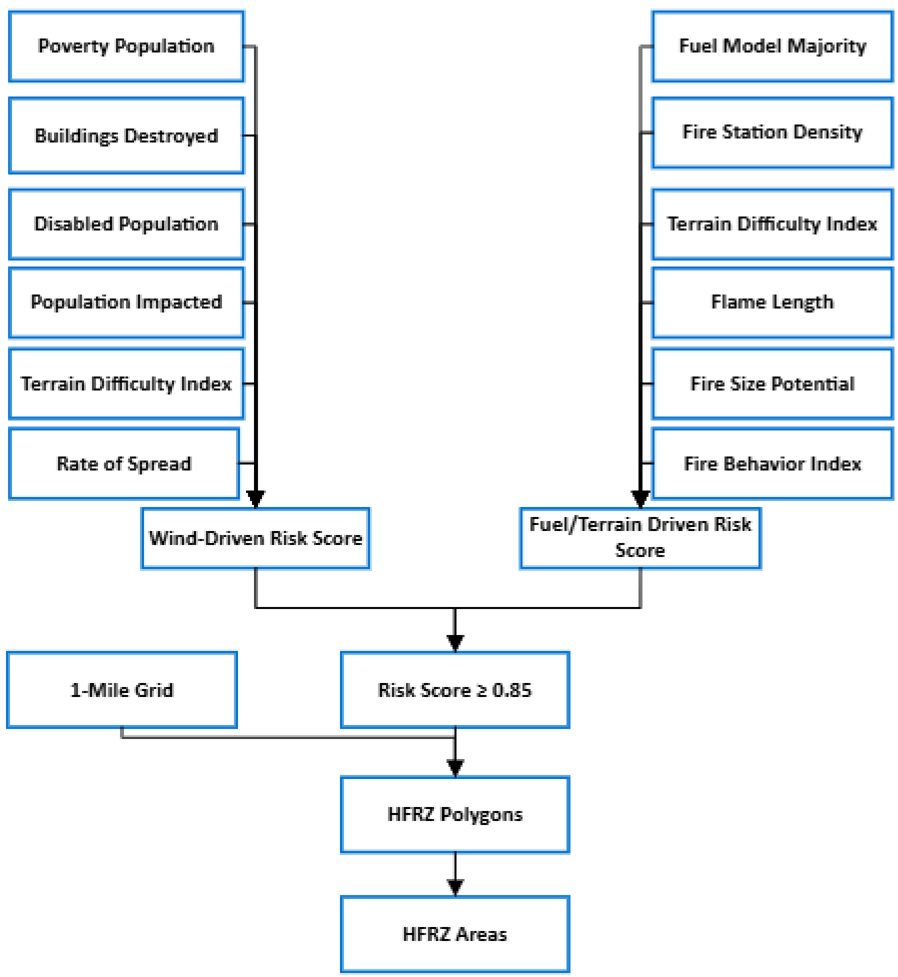


Figure H-1: HFRZ Analysis Framework

Risk Scores

To evaluate the boundaries of the HFRZ, the Company calculates separate risk scores for fuel/terrain-driven and wind-driven wildfires. Justification for differentiating between fuel/terrain-driven and wind-driven risk can be found in Section 1 of PacifiCorp's 2024 Oregon WMP.

Fuel/Terrain-Driven Score

The fuel/terrain-driven score represents wildfire risk driven primarily by substantial dry fuel loads and steep topography. Fires in this category generally occur during peak fire season, are constrained by the distribution of dry fuels, and are in terrain that is difficult to access. The score incorporates the following components:

- Fire Behavior Index – Scale to predict potential fire behavior based on weather conditions
- Fire Size Potential – Number of acres burned
- Flame Length – Length of flames
- Terrain Difficulty Index – Difficulty of terrain for fire suppression and potential fire spread
- Fire Station Density – Density of fire stations, indicating access to suppression resources
- Fuel Model Majority-Majority fuel model in each pixel

The fuel/terrain-driven score is calculated according to the following formula:

$$\text{Fuel/Terrain-Driven Score} = 0.20(\text{Fire Behavior Index}) + 0.20(\text{Fire Size Potential}) + 0.20(\text{Flame Length}) + 0.25(\text{Terrain Difficulty Index}) + 0.10(\text{Fire Station Density}) + 0.05(\text{Fuel Model Majority})$$

Wind-Driven Score

The wind-driven score represents wildfire risk driven primarily by high-wind conditions. These fires typically spread quickly and exhibit high initial destructive potential. The score is composed of the following elements:

- Rate of Spread – A high rate of fire spread indicates fast-moving, hard-to-contain fires

- Population Impacted – Number of customers impacted
- Buildings Destroyed – Estimated number of buildings destroyed
- Terrain Difficulty Index – Difficulty of terrain for fire suppression and potential fire spread
- Disability Population – Percentage of population with disability
- Poverty Population – Poverty percentage

The wind-driven score is calculated according to the following formula:

$$\text{Wind-Driven Score} = 0.30(\text{Rate of Spread}) + 0.25(\text{Population Impacted}) + 0.25(\text{Buildings Destroyed}) + 0.10(\text{Terrain Difficulty Index}) + 0.05(\text{Disability Population}) + 0.05(\text{Poverty Population})$$

HFRZ Polygons

Grid cells with utility assets and a wind-driven or fuel/terrain-driven risk score ≥ 0.85 are included in the HFRZ polygons. Cells with both risk scores below the 0.85 threshold are not included in the HFRZ.

HFRZ Map Creation

The grid cells identified through the risk score assessment above were the basis for additions to the Company's fire high consequence area (FHCA) maps, which were replaced by the expanded HFRZ in 2024. The resulting HFRZ includes both the new areas identified above and the pre-existing FHCA.

FireSight Risk Simulations

PacifiCorp combines utility data and expertise, public data, and cutting-edge software to analyze utility-associated wildfire risk. As discussed in the 2024 WMP, PacifiCorp implemented FireSight, a commercially available tool from Technosylva. FireSight is part of a broader software suite called Wildfire Analyst Enterprise (WFA-E). Technosylva has provided advanced wildfire products and services to utilities throughout the United States since 1997, and other modules in WFA-E are used by the California Department of Forestry and Fire Protection (Cal Fire). With in-house fire and data scientists, Technosylva partners with key providers in fire planning, advanced data modeling, and wildland fire research and development to enhance the models used in their software.

The FireSight module builds upon the quantitative risk modeling developed by Technosylva that associates wildfire hazards with the location of electric overhead assets. PacifiCorp uses FireSight to forecast the consequence or impact of a wildfire from a given ignition point in the Company's service territory based on the potential spread of a wildfire, should it occur. PacifiCorp chose to implement FireSight based on Technosylva's experience with other West Coast utilities and their partnerships with experts in wildfire risk modeling and fire data science. The FireSight model combines the utility's asset information with public data regarding community characteristics, terrain, vegetation, and weather information to provide ignition risk scores at points along a circuit. Specific to this model, Technosylva sources information on climate, historic weather conditions, terrain, fuels, population, and the built environment (buildings and roads) from public sources. Consistent with OAR 860-300-030(c)(A), a complete list of inputs with sources and the frequency of updates is provided at the end of this appendix.

The FireSight model has two primary parts: Risk Associated with Ignition Location (RAIL) and Risk Associated with Value Exposure (RAVE). Outputs from these model components flow into the Company's risk modeling.

RAIL and RAVE

RAIL represents the conditional and expected outputs of the FireSight model, including fire intensity, rate of spread, and consequence metrics such as acres burned and populations affected. The RAIL fire simulation output is aggregated to the simulation units described in Section 4.2.3.

Figure H-2 shows the inputs and outputs of the RAIL model.

Figure H-2: The RAIL Model

RAVE assesses the characteristics of the area under risk of ignition. Community demographics, geography, and the built environment influence how vulnerable or resilient a community is to wildfire. RAVE is independent of the asset risk calculated in RAIL and considers the risk associated with additional factors. RAVE attributes are aggregated to Uber H3 hexagonal polygons, also referred to as plexels. Figure H shows the inputs and outputs of the RAVE model.

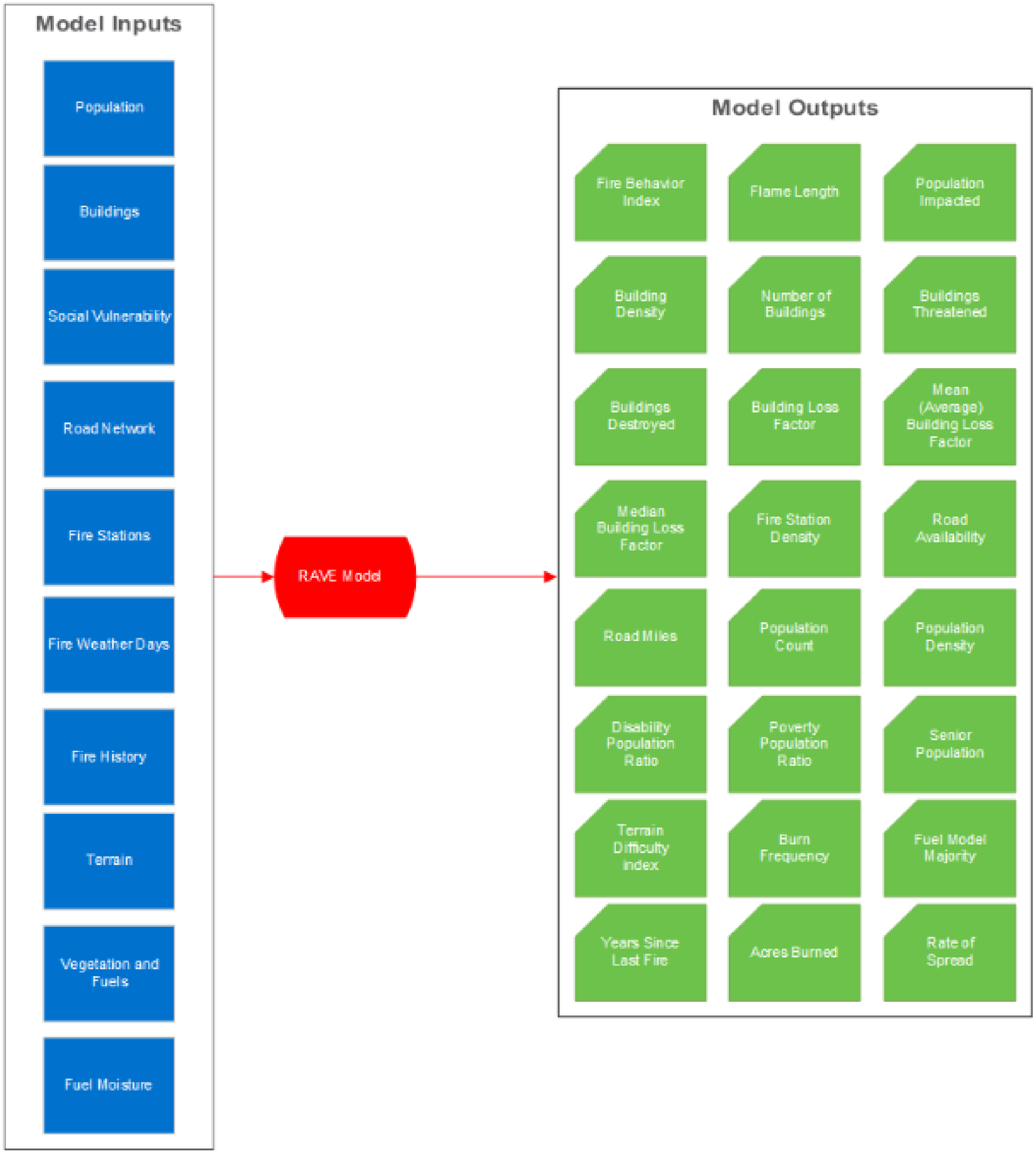


Figure H-3: The RAVE Model

Risk Modeling Data

The following tables provide consolidated information about the data used in PacifiCorp's risk modeling.

H-1: Risk Model Inventory

Model Name	Model Description
FireSight	Used for modeling long-term wildfire risk in Planning Model Versions 1 and 2, as described in Section 4
PacifiCorp's Monetized RSE Calculation	Used for monetization of risk and RSE calculations in Planning Model Version 2 as described in Section 4
WFA-E: FireCast/FireSim	Used for Situational Awareness as described in Section 9
Fire Potential Index	Used for Situational Awareness as described in Section 9

Table H-2: FireSight and WFA-E Model Inputs

Dataset	Spatial Resolution (in Meters unless specified otherwise)	Start of Dataset	Dataset Update Frequency	Source
Landscape Characteristics				
Terrain	10		Yearly	United States Geological Survey (USGS)
Surface Fuels	30/10	2020	Pre-Fire Season, Monthly Update in Fire Season, End of Fire Season	Technosylva
Wildland Urban Interface (WUI) and Non-Forest Fuels Land Use	30/10	2020	Twice A Year	Technosylva
Canopy Fuels (CBD, CH, CC, CBH)	30/10	2020	Pre-Fire Season, Monthly Update in Fire Season, End of Fire Season	Technosylva
Roads Network	30		Yearly	USGS
Hydrography	30		Yearly	USGS
Croplands	30	1997	Yearly	USDA
Weather And Atmospheric Data				
Wind Speed	2000	1990	Hourly / 96 Hour Forecast	Technosylva
Wind Direction	2000	1990	Hourly /96 Hour Forecast	Technosylva
Wind Gust	2000	1990	Hourly / 96 Hour Forecast	Technosylva
Air Temperature	2000	1990	Hourly / 96 Hour Forecast	Technosylva
Surface Pressure	2000	1990	Hourly / 96 Hour Forecast	Technosylva
Relative Humidity	2000	1990	Hourly / 96 Hour Forecast	Technosylva

Dataset	Spatial Resolution (in Meters unless specified otherwise)	Start of Dataset	Dataset Update Frequency	Source
Precipitation	2000	1990	Hourly / 96 Hour Forecast	Technosylva
Radiation	2000	1990	Hourly / 96 Hour Forecast	Technosylva
Water Vapor Mixing Ratio 2 meter	2000	1990	Hourly / 96 Hour Forecast	Technosylva
Snow Accumulated – Observed	1000	2008	Daily	National Oceanic and Atmospheric Administration (NOAA)
Precipitation Accumulated – Observed	4000	2008	Daily	NOAA
Burn Scars	10	2000	5 Days	National Aeronautics and Space Administration (NASA)/ European Space Agency (ESA)
Weather Observations Data	Points	1990	10 Min	Synoptic
Fuel Moisture				
Herbaceous Live Fuel Moisture	250	2000	Daily / 5-Day Forecast	Technosylva
Woody Live Fuel Moisture	250	2000	Daily / 5-Day Forecast	Technosylva
1-Hour Dead Fuel Moisture	2000	1990	Hourly / 124 Hour Forecast	Technosylva
10-Hour Dead Fuel Moisture	2000	1990	Hourly / 124 Hour Forecast	Technosylva
100-Hour Dead Fuel Moisture	2000	1990	Hourly / 124 Hour Forecast	Technosylva
Values at Risk				
Buildings	Polygon Footprints	2020-21	Yearly	Microsoft/ Technosylva
Damage Inspection (DINS)	Points	2014-21	Yearly	Cal Fire
Population	90	2019	Yearly	LANDSCAN, Oak Ridge National Laboratory (ONRL)
Roads	Vector Lines	2021	Yearly	Caltrans
Social Vulnerability	Plexels	2021	Yearly	ESRI Geoenrichment Service
Fire Stations	Points	2021	Yearly	ESRI, USGS
Building Loss Factor	Building Footprints	2022	Yearly	Technosylva
Critical Fatalities	Points	2021	Yearly	Fire Resource Assessment Program (FRAP), Cal Fire

Dataset	Spatial Resolution (in Meters unless specified otherwise)	Start of Dataset	Dataset Update Frequency	Source
Potential Ignition Locations				
Distribution & Transmission Lines	Linear Segments	2022	Updated Quarterly	PacifiCorp
Poles & Equipment	Points	2022	Updated Quarterly	PacifiCorp
Outage History	Points	1989	Annual	PacifiCorp
Ignition History	Points	2020	Annual	PacifiCorp
Fire Activity				
Hotspots MODIS	1000	2000	Twice A Day	NASA
Hotspots VIIRS	375	2014	Twice A Day	NASA
Hotspots GOES 16/17	3000	2019	10 Minute	NASA
Fireguard	Polygons	2020	15 Minute	National Guard
Fire Season Perimeters	Polygons	2021	Daily	National Incident Feature Service (NIFS)
Historic Fire Perimeters	Polygons	1900	Yearly	Cal Fire
Alert Wildfire Cameras	Live Feeds	Real Time	1 Minute	Alert Wildfire Consortium
Lighting Strikes	1000	Real Time	1 Minute	Earth Networks/ Others

Table H-3: FireSight Outputs

Attribute	Description	Percentiles
Acres Burned	Number of Acres Burned	0, 20, 40, 60, 80, 90, 95, 98, and 100
Building Density	Building Density per Plexel	N/A
Buildings Destroyed	Number of Buildings Destroyed	0, 20, 40, 60, 80, 90, 95, 98, and 100
Building Loss Factor	Estimated Building Loss Factor Within the Plexel.	0, 20, 40, 60, 80, 90, 95, 98, and 100
Building Loss Factor (Average-Mean)	Average Estimated Building Loss Factor Within the Plexel.	0, 20, 40, 60, 80, 90, 95, 98, and 100
Building Loss Factor (Median)	Average Estimated Building Loss Factor Within the Plexel.	0, 20, 40, 60, 80, 90, 95, 98, and 100
Buildings Threatened	Number of Buildings Threatened	0, 20, 40, 60, 80, 90, 95, 98, and 100
Burn Frequency	Burn Frequency is the number of times a plexel is touched from all assets ignited simulations run for the selected weather days. It is similar to traditional burn probability although this only represents a frequency, not a probability.	N/A
Disability Population	Disability Population Ratio	N/A
Fire Behavior Index	Fire Behavior Index	0, 20, 40, 60, 80, 90, 95, 98, and 100
Fire Station Density	Density of Fire Stations in a location	N/A

Attribute	Description	Percentiles
Flame Length	Feet	0, 20, 40, 60, 80, 90, 95, 98, and 100
Fuel Model Majority	Majority Fuel in Each Plexel	N/A
Number of Buildings	Number of Building per Plexel	N/A
Population Count	Population Count per Plexel	0, 20, 40, 60, 80, 90, 95, 98, and 100
Population Density	Population Density per Plexel	0, 20, 40, 60, 80, 90, 95, 98, and 100
Population Impacted	Population Count	0, 20, 40, 60, 80, 90, 95, 98, and 100
Poverty Population	Poverty Population Ratio	N/A
Rate of Spread	Feet/Hour	0, 20, 40, 60, 80, 90, 95, 98, and 100
Road Availability-With Social Vulnerability Population	Availability of Roads in a Location with Consideration of Social Vulnerability Population	N/A
Road Availability-With No Population	Availability of Roads in a Location with No Consideration of Social Vulnerability Population	N/A
Road Miles	Total Miles (Major + Minor)	N/A
Senior Population	Senior Population Ratio	N/A
Terrain Difficulty Index	Terrain Difficulty per Plexel	N/A
Years Since Last Fire	Years Since Last Fire per Plexel	N/A

Table H-4: PacifiCorp's Monetized RSE Calculation Inputs

Dataset	Unit	Start of Data Set	Update Frequency	Source
Serious Injuries and Fatalities	USD/fatality USD/injury Fatality/destroyed structure Injury/destroyed structure	2021,2024	N/A*	U.S. Department of Transportation [19] CAL-FIRE[20]
Structures	USD/destroyed structure	2023	5 years,	US Census Bureau [21]
Reliability	USD/customer minute interrupted	2025	N/A*	Lawrence Berkeley National Laboratory [22]
Suppression Costs	USD/acre	2024	Annually, Quarterly	NIFC[23] COLI[24]

[19] U.S. Department of Transportation, Treatment of the Value of Preventing Fatalities and Injuries in Preparing Economic Analyses: Departmental Guidance (2021 Update) (Washington, DC: U.S. DOT, March 2021).
[20] California Department of Forestry and Fire Protection (CAL FIRE), Statistics, 2024.
[21] U.S. Census Bureau, American Community Survey (ACS) 5-Year Estimates: Median Housing Value, Table B25075, 2023,
[22] Lawerence Berkeley National Laboratory, ICE 2.0 Phase I Final Report, May 29, 2025.
[23] National Interagency Fire Center (NIFC), "Suppression Costs."
[24] ACCRA cost of living index: https://www.coli.org.

Dataset	Unit	Start of Data Set	Update Frequency	Source
Restoration Costs	USD/acre	2006	N/A*	USFS[25]
Commercial Acres	USD/acre	2025,2024	Weekly, Quarterly	USDA NASS[26] NCREIF[27]
LANDFIRE Forest Canopy Cover	% canopy cover	2023	Annual	USGS
LANDFIRE Forest Canopy Height	Vegetation Height	2023	Annual	USGS
Elevation		Accessed 2025	N/A*	USGS 3D Elevation Program, accessed via ArcGIS Rest server
National Land Cover Database		2024	Annual	USGS

* The source does not provide an update frequency. The Company plans to update datasets when the data source publishes updated values.

Table H-5: Fire Potential Index Inputs

Feature Group	Feature	Altitude	Description	Source	Update Cadence	Spatial Granularity	Temporal Granularity
Weather	Wind, sustained and gusts	10 m	Wind speed and gust measured	Internal PacifiCorp WRF	Twice daily	2 km	Hourly
Fuel Complexity	Fuel type, fuel load and fuel age	Surface	Quantifies the fuel type, fuel load and fuel age	Technosylva	Annually	30 m	N/A
Weather	Relative humidity, vapor pressure deficit	Surface	Moisture variable from the atmosphere	Internal PacifiCorp WRF	Twice daily	2 km	Hourly
Terrain	Terrain Difficulty Index	N/A	Quantifies the terrain and its potential impacts on suppression activity including accessibility, fuel penetrability, and ease of opening fire line.	Technosylva	Annually	30 m	N/A
Fuel Moisture	1 and 10 hour dead fuel moisture	10 m	Moisture of dead fuels	Internal PacifiCorp WRF	Twice daily	2 km	Hourly
Fuel Moisture	Woody and Herbaceous Live Fuel moisture	10 m	Moisture of live fuels	Remote Sensing data	Daily	2 km	Hourly

[25] Burned Area Emergency Response Treatments Catalog (BAERCAT), United States Department of Agriculture, Forest Service, Burned Area Emergency Response Treatments Catalog, December 2006.
[26] U.S. Department of Agriculture, National Agricultural Statistics Service, QuickStats Ad-hoc Query Tool, accessed October 15, 2025, https://quickstats.nass.usda.gov.
[27] National Council of Real Estate Investment Fiduciaries (NCREIF), Timberland Quarterly Total Return Trends by Region: NCREIF Timberland Index Press Release for 4Q2023, January 25, 2024.

Appendix I – Risk Model Development Environment

Model reproducibility and traceability from data source to final output is maintained via the Python model framework. Each step of the modeling process, from data ingestion to aggregation to the calculation process, is documented in the Company's Python codebase. This environment leverages cloud resources for input and output data storage. DevOps is a set of practices and tools that aim to shorten the systems development lifecycle while delivering features, fixes, and updates frequently in close alignment with business objectives. DevOps is used for project management and includes branch versioning and repository management. A model taxonomy also has been introduced to track model vintages and document changes in the codebase. This model architecture maintains accountability for changes to the risk model components detailed in the Planning Model Version 2 schematic in Figure I-1.

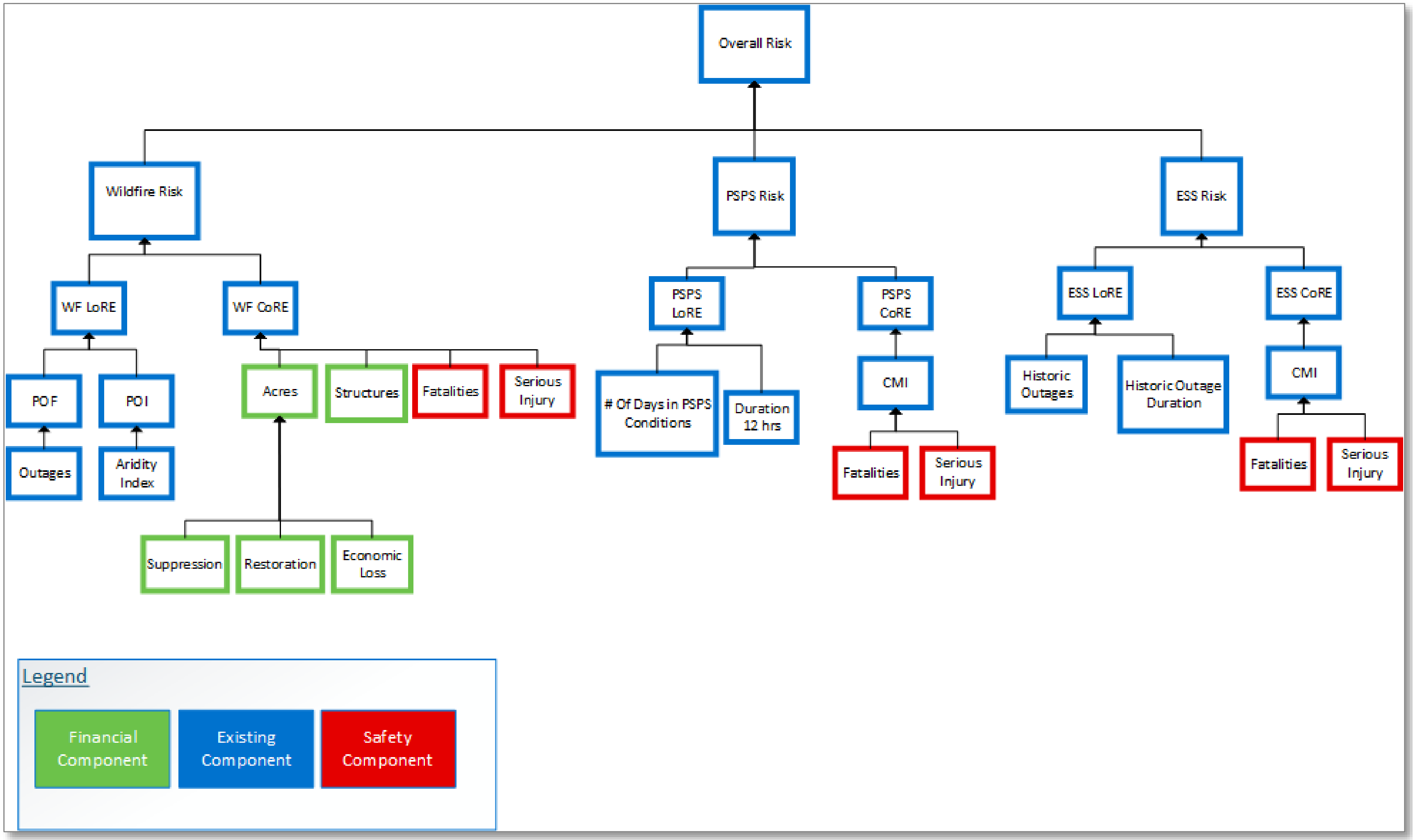


Figure I-1: Planning Model Version 2 Schematic

Appendix J – The OPUC Risk Spend Efficiency (RSE) Workbook

Introduction

In this appendix, the Company describes how it compiled, transformed, and input data into the OPUC RSE Workbook. Throughout 2025, OPUC Staff and the Commission oversaw the production of the workbook, and an initial version of it was presented on October 30, 2025, with ongoing development scheduled to occur throughout 2026.[28] In Order No. 25-326, the Commission stated:

> *We recognize that the Multi-year Wildfire Mitigation Plan Shared Format, and as discussed at the public meeting, Sections 4.3 and 4.4 and Table OPUC 4-2, regarding asset and outage risk analyses in particular, are intended to generate the best available information. We also recognize that there will be ongoing evolution in these efforts, and we primarily are seeking to consolidate discussions utilities have incorporated in past plans into a single location in each plan. We expect these efforts to be stakeholder facing, answering some of the high-level questions communities ask about risk identification. We do not expect standardized risk evaluations across the utilities at this time. We reiterate our expectation that utilities will make their best efforts in communicating this information, recognizing the iterative nature of the work in this docket, that the shared format template will continue to evolve.*

As discussed in Sections 4 and 5, PacifiCorp used its own long-term risk modeling for mitigation planning in the 2026-2028 WMP. The Company did not use the OPUC's standardized RSE Workbook for mitigation planning.

In addition to providing information on filling out the OPUC RSE Workbook, the Company concludes this appendix with observations about the workbook that it hopes will be useful in ongoing

[28] *See* UM 2340, OPUC Staff Presentation on Risk Spend Efficiency for Special Public Meeting, October 30, 2025. um2340hah341330027.pdf.

development efforts. The filled out workbook is very large and therefore not included in this appendix. A digital copy can be provided upon request.

Outage and Asset Data

The Company drew upon two internal datasets for outage and asset data: its Geographic Reliability Enhancement and Analysis Tool – Extensively Revised (GREATER) and Geographic Information System (GIS) databases.

The Company's outage data includes all outages for grid devices in Oregon for the years 2020–2025, which totaled 191,809 outages. Outage data has several attributes, including the outage location and duration, an internal direct cause description (when known), and whether ESS were active during the outage. For the OPUC RSE Workbook, the Company mapped internal direct cause descriptions to the workbook outage categories where possible. Outages without a known cause were filtered out. Outages that had causes with no or low likelihood of starting a wildfire (such as construction or ice) were also filtered out. Finally, outages that could not be linked to a particular existing control device were filtered out. After filtering, 57,090 outages remained in the dataset.

Circuit Segment Outage History

In accordance with OPUC guidance, the Company segmented its grid infrastructure for analysis according to sustained zones of protection (ZOP). Sustained ZOPs are segmented by breakers, reclosers, and fuses, creating small circuit segments. This resulted in approximately 43,000 circuit segments. The 57,090 outages were mapped to these circuit segments, resulting in a certain number of outages per circuit segment. This outage count per circuit segment became the circuit segment's outage history. Outage counts were also calculated within and outside of a fire season, which was defined as April 1 to October 30 for regions east of the Cascades, and May 1 to September 30 for regions west of the Cascades.

In addition to outage history, contextual information was provided for each circuit segment, including the circuit it belongs to, the "operating area" in which it falls, the segment length, and the segment length within the HFRZ.

Non-Monetized Risk Score

In accordance with OPUC Staff guidance, non-monetized risk scores from Planning Model Version 1 were assigned to each primary overhead line. For each circuit segment, the Company reported the median, minimum, maximum, mean, and standard deviation of the scores of the constituent primary overhead line.

Filling Out the Workbook

Tab 1a: The Company produced flow diagrams depicting the non-monetized exposure risk modeling that was fed into the RSE Workbook. Due to the complexity of the risk models, these diagrams were created in Visio and inserted into the OPUC RSE Workbook Excel file.

Tab 1b: The Company provided model input metadata and component interrelationship information in columns A–F. Much of this information is also provided in Table H-2 in Appendix H or depicted in the diagram provided for tab 1a.

Tab 1c: The Company provided model metadata and component interrelationship information in columns A–E. Much of this information is also provided in Table H-2 in Appendix H or depicted in the diagram provided for tab 1a.

Tab 1d: The Company input the Circuit ID, Circuit Segment ID, Start FP, End FP, Operating Area, Segment Miles, Miles in HFRZ, and non-monetized risk scores, using datasets referenced in tabs 1b and 1c. The workbook exposure risk score was set to equal the mean exposure risk score. For each circuit segment, the Company input the median, minimum, maximum, mean, and standard deviation of the non-monetized risk scores of the constituent primary overhead line.

Tab 2a: The Company mapped cause codes from its GREATER database to the risk categories provided in tab 2a.

Tab 2b: The Company input the filtered outage information described above in subsection Circuit Segment Outage History

Circuit Segment Outage History

Tab 2c: The Company did not provide data or make changes within this tab. This tab automatically calculated outputs using information in 2b.

Tab 2d: The Company did not provide data or make changes within this tab. This tab automatically calculated outputs using information in 2b and 2c.

Tab 2e: The Company did not provide data in this tab or make changes to the ignition mitigation effectiveness values provided in this tab.

Tab 2f: The Company did not provide data or make changes within this tab. This tab automatically calculated outputs using information provided in tabs 2b, 2c, and 2d.

Tab 2g: The Company did not provide data or make changes within this tab. This tab automatically calculated outputs using information provided in previous tabs.

Tab 3: The Company did not provide data or make changes within this tab. This tab is still under development.

Tab 4: The Company did not provide data or make changes within this tab. This tab is still under development.

Tab 5a: The Company made no changes in this tab. The outputs of this tab are automatically calculated from previous tabs.

Tab 5b: In accordance with OPUC guidance, the Company made an adjustment in this tab in column H. The Company set this column to carry over values from column F, Total Segment Miles, since mitigations are generally uniform across circuit segments identified for mitigations.

Tab 6a: The Company did not provide data or make changes within this tab. This tab automatically calculated outputs using information provided in previous tabs.

Tab 6b: The Company did not provide data or make changes within this tab. This tab automatically calculated outputs using information provided in previous tabs.

Table OPUC 4-2: Riskiest Circuit Segment Scores

Below, in Table OPUC 4-2(I) from Section 4.6 of this WMP, the Company provides inputs using the OPUC RSE Workbook. In Table OPUC 4-2(I), the Company makes the following assumptions:

- Circuit Segment ID in the table is equivalent to Circuit Segment ID in the RSE Workbook, column D in the Risk Summary tab.
- Geographical Designated Area in the table is equivalent to Operating Area, column F in the 1d-Segment Exposure Results tab.
- HFRZ Score is equivalent to Normalized to 1 – Exposure Risk Score, column C in the Risk Summary tab.
- Outage Risk Driver Score is equivalent to Normalized to 1 – Annual Outage Ignitions, column H in the Risk Summary tab.

The Asset Health Risk and Qualitative Risk tabs of the RSE Workbook have yet to be developed, so the Company did not input values for the remaining columns of Table OPUC 4-2(I). The Company notes that the circuit segments in the Risk Summary tab are indexed according to the 1d-Segment Exposure Results (see column D of the Risk Summary tab), so the top 60 results are the top riskiest according to the HFRZ score.

Table OPUC 4-2(l): Riskiest Circuit Segment Scores

Circuit Segment ID	Geographical Designated Area (ID and Name)	HFRZ Score	Outage Risk Driver Score	Asset Risk Driver Score	Qualitative Risk Score	Combined Risk Score
4U39-OH_152440_1710740610	Roseburg	1.00	0.00	N/A	N/A	N/A
5K37-OH_336503__9270782	Hood River	0.98	0.01	N/A	N/A	N/A
4U39-OH_164906_176580362	Roseburg	0.96	0.00	N/A	N/A	N/A
4U39-OH_094002_1711211581	Roseburg	0.95	0.08	N/A	N/A	N/A
4M185-OH_132301_1620281161	Corvallis	0.95	0.05	N/A	N/A	N/A
5U17-OH_144405_396220395	Roseburg	0.93	0.02	N/A	N/A	N/A
4U81-OH_216102__10252696	Roseburg	0.93	0.00	N/A	N/A	N/A
4U39-OH_164702_176580443	Roseburg	0.92	0.13	N/A	N/A	N/A
5U17-OH_159302_1731191304	Roseburg	0.91	0.00	N/A	N/A	N/A
4U39-OH_167102_176580498	Roseburg	0.91	0.03	N/A	N/A	N/A
4M134-OH_010003_182600354	Corvallis	0.91	0.00	N/A	N/A	N/A
5U33-OH_034001_491620570	Roseburg	0.90	0.00	N/A	N/A	N/A
5U17-OH_143600_396220428	Roseburg	0.90	0.00	N/A	N/A	N/A
4U39-OH_165603_176580419	Roseburg	0.90	0.00	N/A	N/A	N/A
4U39-OH_166302_1711445932	Roseburg	0.90	0.00	N/A	N/A	N/A
4M134-OH_011508_1620549053	Corvallis	0.89	0.10	N/A	N/A	N/A
5U17-OH_141101_1731191375	Roseburg	0.89	0.09	N/A	N/A	N/A
4M134-OH_012102_1120301198	Corvallis	0.88	0.03	N/A	N/A	N/A
5U17-OH_147601_396220454	Roseburg	0.88	0.03	N/A	N/A	N/A
5R182-OH_040002_790900397	Medford	0.86	0.01	N/A	N/A	N/A
5R77-OH_148500__7277397	Grants Pass	0.86	0.00	N/A	N/A	N/A
4M245-RC_321760_1610470102	Albany	0.86	0.09	N/A	N/A	N/A
4U38-OH_282702__7048756	Roseburg	0.86	0.04	N/A	N/A	N/A
4M134-OH_120900_182600580	Corvallis	0.85	0.00	N/A	N/A	N/A
5R77-OH_149603__6280056	Grants Pass	0.85	0.02	N/A	N/A	N/A
5U17-OH_145101_396220391	Roseburg	0.85	0.09	N/A	N/A	N/A
5R77-OH_211400_1741825745	Grants Pass	0.85	0.04	N/A	N/A	N/A
4M185-OH_132400_387470316	Corvallis	0.85	0.02	N/A	N/A	N/A
4U39-OH_065102_637710656	Roseburg	0.85	0.00	N/A	N/A	N/A
4R13-STV_CB4R13	Medford	0.85	0.02	N/A	N/A	N/A
4U39-OH_165000_176580500	Roseburg	0.85	0.05	N/A	N/A	N/A
5L54-OH_282300_824060266	Klamath Falls	0.84	0.01	N/A	N/A	N/A
4R33-OH_031101_797580411	Grants Pass	0.84	0.00	N/A	N/A	N/A
5R182-OH_088100__4721588	Medford	0.84	0.05	N/A	N/A	N/A
5U17-OH_233608__5555593	Roseburg	0.84	0.00	N/A	N/A	N/A

5U32-OH_223700_835040405	Roseburg	0.84	0.00	N/A	N/A	N/A
4U39-OH_168601_176580388	Roseburg	0.84	0.04	N/A	N/A	N/A
4M245-OH_284001_473010153	Albany	0.84	0.04	N/A	N/A	N/A
5L55-OH_270803_408010702	Klamath Falls	0.84	0.01	N/A	N/A	N/A
4M134-OH_013300_1620450353	Corvallis	0.84	0.01	N/A	N/A	N/A
4U39-OH_081901_637710704	Roseburg	0.84	0.07	N/A	N/A	N/A
5U32-OH_107102_491620472	Roseburg	0.84	0.04	N/A	N/A	N/A
5U17-OH_155602_396220467	Roseburg	0.84	0.04	N/A	N/A	N/A
4U38-OH_225103_284150299	Roseburg	0.83	0.04	N/A	N/A	N/A
5R77-OH_126405_797580314	Grants Pass	0.83	0.01	N/A	N/A	N/A
5R77-OH_131702_1741796340	Grants Pass	0.83	0.01	N/A	N/A	N/A
5R77-RGR_CB5R77	Grants Pass	0.83	0.03	N/A	N/A	N/A
5R77-OH_141604_202370609	Grants Pass	0.83	0.01	N/A	N/A	N/A
4R33-OH_168600_740810441	Grants Pass	0.82	0.01	N/A	N/A	N/A
4U10-OH_070105__6468135	Roseburg	0.82	0.03	N/A	N/A	N/A
5L54-OH_334700_1240726331	Klamath Falls	0.82	0.01	N/A	N/A	N/A
4R33-OH_169907_740810420	Grants Pass	0.82	0.06	N/A	N/A	N/A
4R13-OH_016504_768240391	Medford	0.82	0.00	N/A	N/A	N/A
5R172-OH_244106_224410537	Grants Pass	0.82	0.06	N/A	N/A	N/A
4R33-OH_032303_797580368	Grants Pass	0.82	0.04	N/A	N/A	N/A
4M185-OH_132600_387470321	Corvallis	0.82	0.00	N/A	N/A	N/A
5M126-OH_200060__7662280	Stayton	0.82	0.02	N/A	N/A	N/A
5R77-OH_208260_333770129	Grants Pass	0.82	0.02	N/A	N/A	N/A
5W202-OH_119000_842710139	Pendleton	0.82	0.07	N/A	N/A	N/A
4A316-OH_237900_494730273	Lincoln City	0.82	0.01	N/A	N/A	N/A

Observations Regarding Dataflow and Risk Summary Outputs in the RSE Workbook

1. The Company noticed potentially invalid outputs that it believes are related to the Annual Mitigation RSE (millions) columns in tab 6a. When mitigations have costs below $1 million, the workbook seems to malfunction. Estimated mitigation costs below $1 million are not uncommon, given that segmenting the system according to sustained ZOPs results in very short circuit segments, and several mitigations' costs are calculated as the product of the cost-per-mile of the mitigation and the length of the segment.

2. The Company noticed a potential error in tab 6a. In column P, Risk Reduced, sometimes a value greater than 1 is produced, which seems to indicate a post-mitigation risk reduction greater than the initial risk associated with the circuit segment.
3. The Company noticed that "div/0" errors occur in tab 6a and tabs flowing into it when the total number of outages on a segment is zero, the number of outages outside fire season is zero, or the number of outages within fire season is zero. This is common because segments based on the sustained ZOP are small and many have not had outages associated with them in the 2020–2025 outage data period.