

April 30, 2024

VIA ELECTRONIC FILING

Leslie L. Palmer, Director
Safety and Enforcement Division
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, California, 94102-3298
Leslie.Palmer@cpuc.ca.gov

RE: (U-901-E) PacifiCorp's 2023 Annual Report in Compliance with General Order No. 166 (D. 98-07-097)

Enclosed is a copy of PacifiCorp's d/b/a Pacific Power, 2023 Annual Report in compliance with General Order No. 166 (D.98-07-097), revised by D.21-05-019. A redacted version of this report is also being submitted in accordance with Energy Division instruction.

PacifiCorp is requesting confidential treatment of certain phone numbers and locations identified in Attachment B. To the best of the company's knowledge, this information has not been published externally, and confidential treatment is requested for privacy and security reasons.

Confidential and redacted versions are enclosed, along with the declaration required under D.16-08-024.

Please direct any inquiries to Pooja Kishore, California Regulatory Affairs Manager, at (503) 813-7314.

Sincerely,



Matthew McVee
Vice President, Regulatory Policy and Operations

Enclosures

cc:

Danjel.Bout@cpuc.ca.gov
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California Public Utilities Commission

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**DECLARATION OF
MATT MCVEE (PACIFICORP)**

1. My name is Matthew McVee. My business address is 825 NE Multnomah Street, Suite 2000, Portland, Oregon 97232.

2. I am Vice President, Regulatory Policy and Operations, for PacifiCorp d/b/a Pacific Power (PacifiCorp or the Company). PacifiCorp is a multi-jurisdictional utility providing electric retail service to customers in California, Idaho, Oregon, Utah, Washington, and Wyoming. PacifiCorp serves approximately 46,000 customers in portions of Del Norte, Modoc, Shasta, and Siskiyou Counties in northern California.

3. This declaration is based on my information and belief and is submitted in accordance with General Order (GO) 66-D of the California Public Utilities Commission (Commission).

4. Section 3.2 of GO 66-D provides that when a utility submits documents for which it seeks confidential treatment to the Commission or staff of the Commission outside of a formal proceeding, the utility must mark the document or applicable portions confidential and provide the basis for confidential treatment specified. Additionally, any such request must be accompanied by a declaration signed by an officer of the requesting company.

5. PacifiCorp hereby requests confidential treatment for certain information contained in its updated 2023 Annual Report in Compliance with Standard 11 of General Order No. 166, including certain phone numbers and location information provided in the Company's Emergency Response Plan. The Emergency Response Plan, included as Attachment B to PacifiCorp's 2023 Annual Report in Compliance with Standard 11 of General Order No. 166, is an internal document that is not part of the public version of PacifiCorp's 2023 Annual Report in Compliance with Standard 11 of General Order No. 166 and is accordingly omitted from the public version of the report. Additionally, various portions of the Emergency Response Plan, highlighted in yellow, include confidential information. This information has not been published externally by the Company, and confidential treatment of this data is requested for privacy

reasons that protect this data from disclosure under California law.¹ Release of this information (specifically locations identified as emergency operation centers during events) could also result in disruptions in execution of the Company's emergency response plan; accordingly, it is in the public interest to maintain this information as confidential.² Protection of this information will ensure that the Company is able to quickly and efficiently respond to emergency conditions without interference.

6. Information regarding requests for disclosure of the information for which PacifiCorp seeks confidential treatment should be directed to the following individuals:

California Dockets
PacifiCorp
californiadockets@pacificorp.com

Pooja Kishore
PacifiCorp
Regulatory Affairs Manager
pooja.kishore@pacificorp.com

I declare under penalty of perjury of the laws of the state of California that the foregoing is true and correct.

Executed in Portland, Oregon, April 30, 2024.



Matthew McVee
Vice President, Regulatory Policy and Operations
PacifiCorp

¹ Cal. Gov't Code §§7927.700, 7927.705, and 7929.205.

² Cal. Gov't Code, § 7922.000.

PACIFICORP’S (U 901 E)
2023 ANNUAL REPORT IN COMPLIANCE WITH
GENERAL ORDER NO. 166

Pursuant to General Order 166, Standard 11, PacifiCorp d/b/a Pacific Power (“PacifiCorp” or “Pacific Power” or “Company”) submits its annual report its compliance with General Order 166 for the period January 1, 2023, through December 31, 2023 (“compliance period”). As detailed below, this report demonstrates PacifiCorp’s compliance with each of the fourteen standards of the General Order and is submitted as two Attachments (A – 2023 Annual Report with Exhibits A through E) and (B – Emergency Response Plan with a supplemental annex).

Standard 1 - Prepare an emergency response plan and update the plan annually.

The 2024 PacifiCorp Emergency Response Plan consists of one volume, included as Attachment B with one annex. The Emergency Response Plan addresses each of the requirements specified in Standard 1. The section below identifies the location in PacifiCorp’s Emergency Response Plan where each of the required elements are covered. The plans as filed are the most current version and are reviewed for improvement after any exercise or response.

This report includes the following documents:

Attachment A 2023 General Order 166 Annual Report

Exhibit A Mutual Assistance Agreements

Exhibit A1 California Utilities Emergency Association (CUEA) Mutual Assistance Agreement

Exhibit A2 CUEA PacifiCorp signature Page

Exhibit A3 Intercompany Mutual Assistance Agreement signed

Exhibit A4 Western Region Mutual Assistance (WRMAG) Agreement

Exhibit A5 WRMAG PacifiCorp’s signature page

Exhibit B California Exercise Documents

Exhibit B1 PacifiCorp 2023 Siskiyou County PSPS FE After Action Report

Exhibit B2 PacifiCorp 2023 Siskiyou County PSPS TTX Presentation

Exhibit B3 PacifiCorp 2023 Siskiyou County PSPS TTX After Action Report

Exhibit B4 PacifiCorp 2023 Siskiyou County PSPS FE Presentation

Exhibit B5 PacifiCorp 2023 Siskiyou County FE Participant Guide

Exhibit B6 PacifiCorp 2023 Siskiyou County PSPS TTX Notes

Exhibit B7 PacifiCorp 2023 Siskiyou County FE Exercise Plan

Exhibit C 2023-2025 California Wildfire Mitigation Plan

Exhibit D Public Safety Power Shutoff Execution

Exhibit D1 Public Safety Power Shutoff Execution Playbook 2024

Exhibit D2 Community Resource Center Plan 2024

Exhibit D3 Access and Functional Needs Plan 2024

Exhibit E External Partner Engagement

Exhibit E1 PacifiCorp CA Wildfire Advisory Board March 2024

Exhibit E2 PacifiCorp CA Modoc Disaster Council April 2024

Attachment B Emergency Response Plan

B1 Emergency Response Plan

B2 Annex 01 External Emergency Coordination and Communication

Requirements

- A. Internal coordination functions are outlined in **Attachment B1 Emergency Response Plan**, section 3. *Incident Management Structure*. External coordination activities are outlined in **Attachment B2 Annex 01 External Emergency Coordination and Communication**, section 4. *Roles and Responsibilities*, and restoration activities are outlined in **Attachment B1 Emergency Response Plan**, section 5. *Damage Assessment and Restoration Priorities*.
- B. Independent System Operator/Transmission Owner (ISO/TO) coordination is outlined in **Attachment B2 Annex 01 External Emergency Coordination and Communication**, section 3.4 *Notification to Neighbor Utilities*. Restoration priorities are described in **Attachment B1 Emergency Response Plan** sections 5.2 *System Restoration Priorities* and 5.3 *System Restoration Guidelines for Critical Customers*.
- C. Media coordination before, during and after an outage is outlined in **Attachment B1 Emergency Response Plan**, section 3.4 *Emergency Coordination Center (ECC) Roles and Responsibilities, General Staff, Joint Information Team*; and **Attachment B2 Annex 01 External Emergency Coordination and Communication**, sections 3.5.2 *Customer Communication Timeline*, 4.15 *Corporate Communications* and 4.2.2 *ECC Joint Information Team Lead*.
- D. External and governmental coordination with essential customers and appropriate state and local government agencies is outlined in **Attachment B2 Annex 01 External Emergency Coordination and Communication**, section 3. *Notification*. PacifiCorp maintains lists of external contacts in emergency management Directories that are referenced in this section. Regulatory contacts are located in the Company's Incident Reporting Matrix, referenced in section 3.1.1 *Public Utility Commission Notifications*.

PacifiCorp is a multi-state company and uses the National Incident Management System (NIMS). PacifiCorp's use of the NIMS framework is described in **Attachment B1**

Emergency Response Plan, section 2.4 *Plan Alignment* and in the opening statement of section 4. *Incident Management Structure*.

- E. PacifiCorp’s **California Wildfire Mitigation Plan** is provided as **Exhibit C**.
- F. Safety considerations for the public and PacifiCorp’s employees are addressed in **Attachment B1 Emergency Response Plan** section 4. *Safety*; and safety-specific positions in PacifiCorp’s incident management structure are described in sections 3.4.4, *ECC Roles and Responsibilities*, *Safety Officer* and 3.5.1 *Department Operations Center Roles and Responsibilities*, *Field Safety*.
- G. PacifiCorp’s approach to assessing damage is described in **Attachment B1 Emergency Response Plan** sections 5.1 *Damage Assessment Priorities*, and 3.5.1 *Department Operations Center Roles and Responsibilities*.
- H. Restoration priority guidelines are outlined in **Attachment B1 Emergency Response Plan** sections 5.2 *System Restoration Priorities* and 5.3. *System Restoration Guidelines for Critical Customers*.
- I. Mutual assistance processes are outlined in **Attachment B1 Emergency Response Plan** section 6. *Resourcing and Mutual Assistance* and signed **Mutual Assistance Agreements** are provided as **Exhibits A1 – A5** of this report.
- J. PacifiCorp’s Emergency Response Plan, associated annex and Public Safety Power Shutoff (PSPS) execution documents are updated annually and following emergencies and disasters to ensure standards and considerations are appropriate. The 2024 update was informed by 1) internal review with relevant internal business units, 2) lessons learned and industry best practices identified during trainings, exercises and real world events and 3) feedback from external stakeholders following real world events and exercises and, in addition, during two focused community meetings described in Standard 14. Primary changes to the Plan are outlined in Table 1 below.

**Table 1:
Description of Changes**

Part of Document	Section in 2023 Filing	Change
Emergency Response Plan	Attachment B1	Re-organized content to align with industry best practices and BHE incident management plan standards Updated formatting to adhere to BHE standards Updated incident management organizational structure Updated governance due to reorganization of executive leadership Removed Operational Leadership Branch and merged functions into the Executive Policy Group

		<p>Merged elements of previous annexes into the Emergency Response Plan to minimize duplication</p> <ul style="list-style-type: none"> • Governance Transfer • Executive Policy Group • Emergency Coordination Center • Department Operations Center • On Scene Incident Response • Resourcing and Mutual Assistance • Training and Exercises • Internal Emergency Communications • Outage Restoration Procedures <p>Added sections</p> <ul style="list-style-type: none"> • Objectives • Threat Overview • Safety
Annex 01 External Emergency Coordination and Communication	Attachment B2	<p>Updated and reorganized elements of the 2023 Annex 09 External Communications</p> <p>Moved internal communications content to Attachment B1 Emergency Response Plan Internal communication</p> <p>Renamed annex as Annex 01 External Emergency Coordination and Communication</p>

Standard 2 - Enter into mutual assistance agreements with other utilities.

(See **Attachment B1 - Emergency Response Plan**, section 6. *Resourcing and Mutual Assistance*, and **Exhibits A1-A5**)

PacifiCorp has the unique ability to leverage mutual assistance in serving its California customers through access to a wide breadth of resources, including those of PacifiCorp’s parent and sister companies. This includes resources in other Pacific Power jurisdictions (Oregon and Washington), those in Rocky Mountain Power (Utah, Wyoming and Idaho), NV Energy (Nevada) and MidAmerican Energy (Iowa and Illinois). Further, PacifiCorp is a member of several mutual assistance organizations, including most significantly, the California Utilities Emergency Association (CUEA) and the Western Energy Institute’s Western Region Mutual Assistance Group (WRMAG), which is coordinated through the Edison Electric Institute’s (EEI) Mutual Assistance Network. The CUEA allows immediate access to regional, state and federal information. CUEA, via the executive director, actively participates in senior leadership and executive level planning sessions and working groups. The executive director serves as the California Office of Emergency Services Utilities Branch liaison at the state operations center or one of the regional operation centers, representing the CUEA member utilities. The WRMAG accesses resources from Western Energy Institute members spanning across areas west of the Rocky Mountains, while EEI has members across the continent accessible when support from outside the western region is necessary.

These associations, and the three agreements which support the mutual assistance arrangements, provide access to many resources across the western region of the United States and also provide streamlined administration during situations where mutual assistance agreements are needed.

Requirements of Standard 2 incorporated into PacifiCorp’s Mutual Service Agreements:

- A. Resources available to be shared are entered in real time within the RampUp tool that is available through the WRMAG agreement
- B. Procedures for requesting and providing assistance.
- C. Provisions for payment, cost recovery, liability and other financial arrangements
- D. Activation and deactivation criteria

The **mutual assistance agreements** and **signatory pages** are provided as **Exhibits A1 – A5** submitted with this filing.

Standard 3 - Conduct annual emergency training and exercises using the utility’s emergency response plan.

(See **Exhibits B1-B7** and **Attachment B1 Emergency Response Plan**)

Requirement

- A. On March 28, 2023, PacifiCorp hosted a tabletop exercise and on May 15-18, 2023, a functional exercise, both in Siskiyou County. The exercises simulated wildfire response and recovery procedures in which a public safety power shutoff was necessary. Provided as **Exhibits B1-B7** are the presentations, after action reports and additional documentation for these exercises.

The tabletop exercise measured the company’s operational coordination and communications, mass care services, infrastructure systems, public information and warning and planning. This exercise was attended by state, county and tribal representatives, local agencies and vendors that evaluated 1) decision making process, 2) notification process, 3) the company’s community resource center plan and ability to support the impacted community, 4) resource allocation, and 5) the company’s options for supporting people with access and functional needs.

The multi-day functional exercise tested public information and warning and operational coordination capabilities. Twenty-one local, state, federal, private and tribal organizations participated in assessing 1) communication channels, 2) notification processes to customers with access and functional needs and medical baseline needs, and 3) the PSPSP process overall.

- B. The utility shall annually evaluate its response to an exercise or major outage. These evaluations are provided in **Exhibits B1** and **B3** as after-action reports.
- C. PacifiCorp employees participate in monthly safety meetings to discuss ongoing company safety standards, including responding to emergency situations. Employee telephone numbers are available on an “emergency call out list” which is updated and circulated bi-monthly. Field

employee contact information is stored and utilized for automated callouts through a system called Automated Roster Call-Out System (ARCOS).

PacifiCorp employees who are responsible for a task when the Emergency Coordination Center (ECC) is activated complete a computer-based training course annually. Hands-on classroom training is provided to ECC members annually, as well as National Institute Management System training which is available through the Federal Emergency Management Agency's independent study online course.

- D. Invitations and notice of both PacifiCorp exercises were delivered in advance of 10 days to appropriate state and local authorities, including the CPUC, state and regional offices of the OES or its successor, the California Energy Commission, and emergency offices of the counties at or adjacent to the exercise.

In addition, November 14 - 15, 2023 PacifiCorp participated in the North American Electric Reliability Corporation's (NERC's) Electricity Information Sharing and Analysis Center (E-ISAC) GridEx functional exercise to test response and recovery capabilities in cyber and physical security threats and incidents. During the design and implementation of the exercise, PacifiCorp coordinated with RCWest, other WECC utilities and state emergency managers to test internal and external capabilities.

Standard 4 - Develop a strategy for informing the public and relevant agencies of a major outage.

PacifiCorp's strategy for communicating with the media, customers, regulatory agencies and other local governmental organizations is contained in **Attachment B2 Annex 01 External Emergency Coordination and Communication.**

Requirement

- A. **Attachment B2 Annex 01 External Emergency Coordination and Communication**, sections *3.5 Notifications to Customers* and *4. Roles and Responsibilities* outline communications to customers and media before, during and immediately following a major outage.

PacifiCorp's **Access and Functional Needs Plan, Exhibit D3**, outlines the Company's methods for identifying, contacting, providing outreach, communication and education to key customers, including customers who have self-identified as having access and functional needs. In addition, communication methods for people with access and functional needs, individuals with limited English proficiency, tribes and people in remote areas are listed in *Table 8-49 Protocols for Emergency Communications to Stakeholder Groups* located in **Exhibit C 2023-2025 California Wildfire Mitigation Plan**. Both the **2024 Access and Functional Needs Plan** and **2023-2025 Wildfire Mitigation Plan** align with the **PSPS Execution Playbook** found in **Exhibit D1**, the **Community Resource Center Playbook**, **Exhibit D2**.

- B. During a major event, communication is concurrently directed through the 911 call center for immediate dispatch of first responders and between PacifiCorp's emergency manager and

county and local emergency management agencies for additional response coordination (see **Attachment B2 Annex 01 External Emergency Coordination and Communication**, sections 3.2 *Notification to Government and Response Agencies*, and 3.3 *Notification to Other Local Public Safety Partners*). PacifiCorp coordinates all aspects of emergency planning with local governments, including up-to-date points of contact. (See section 4. *Roles and Responsibilities*)

- C. Grid Operations Dispatch will establish and maintain communication with the California Independent System Operator (CAISO), Pacific Gas & Electric, and Bonneville Power Administration for bulk electric system and Critical Path facilities, specifically Line 14 and Path 66 transmission lines. See **Attachment B2 Annex 01 External Emergency Coordination and Communication**, section 3.4.1 *Coordination with Adjacent Transmission Operators and Balancing Authorities*.

Standard 5 - Coordinate internal activities during a major outage in a timely manner.

(See **Attachment B1 Emergency Response Plan**, section 3.41 *ECC Activation*)

The Emergency Coordination Center (ECC) can be activated for any event that requires enhanced strategic planning, incident management, communication, and resource coordination. When there is advanced warning of an event that can have potential widespread impacts to customers or company operations (e.g. National Weather service alert), the ECC may be activated to facilitate pre-event planning and communications.

- PacifiCorp did not experience a major event outage as defined by GO 166 during the January 1, 2023 – December 31, 2023 reporting period.¹

Standard 6 – Notify relevant individuals and agencies of an emergency or major outage in a timely manner.

(See **Attachment B2 Annex 01 External Emergency Coordination and Communication**, sections 3.1 *Notification and Regulatory Partners*, 3.2 *Notification to Government and Response Agencies*, and 3.3 *Notification to Other Local Public Safety Partners*)

PacifiCorp will follow the procedures outlined in the Commission’s July 29, 2009 Guidelines for Notifying Energy Division of Electrical and Gas Emergencies.

As soon as possible or each time new blocks of circuits are interrupted:

Imminent or planned implementation of Interruptible Electric Load Curtailments or Rotating Outages of firm Electric Load by your utility, either ordered by the CAISO (Stage 2 or 3) or made necessary by other emergencies.

Within one hour:

Outage of electric service expected to accrue to over 300,000 customer hours, or exceeding 300 megawatts of interrupted load, or affecting more than 10% of your electric customers.

¹ For utilities with less than 150,000 customers within California, a major outage occurs when 50 percent of the electric utility’s serviceable customers experience a simultaneous, non-momentary interruption of service.

(For utilities with fewer than 150,000 customers in California (small utilities), report when 50% of your customers are affected or 30,000 customer hours of interruption are expected to accrue.)

Within one hour:

An emergency, involving facilities or personnel, likely to be reported statewide or in more than one major media market.

Within one hour:

Interruptions to bulk power supply (generators, transmission lines, or other equipment) that are likely to lead to an ISO declared Stage 2 or 3 emergency on or before the next business day.

Notify by 9 a.m. the next business day:

An electric outage affecting more than 30,000 customers, or lasting over 24 hours for 2,500 customers, or expected to total over 60,000 customer hours, or a situation (such as floodwaters threatening a substation) likely to lead to such an outage (Small utilities shall report outages affecting 3,000 customers, or lasting over 24 hours for more than 250 customers, or are expected to accrue to more than 6,000 customer hours.)

Notify as soon as possible:

Electric outages associated with Office of Emergency Services declared state of emergency, not otherwise reportable under above criteria.

Standard 7 - Mutual Assistance Evaluation

(See **Attachment B1 Emergency Response Plan**, section 6. *Resourcing and Mutual Assistance* and **Mutual Assistance Agreements** in **Exhibit A**)

The emergency manager, or designee, has the responsibility to identify the need for mutual assistance and to initiate and coordinate Mutual Assistance as outlined in **Attachment B1 Emergency Response Plan**, section 6. *Resourcing and Mutual Assistance*. PacifiCorp evaluates estimated time of repair following assessment and based on priorities. This information is manually updated and communicated during major outage events. The need for mutual assistance is evaluated on an ongoing basis.

Standard 8 – Major Outage and Restoration Estimate Communication

(See **Attachment B2 Annex 01 – External Emergency Coordination and Communication**, sections 3.5.2 *Customer Communication Timeline*, 4.1.7 *Customer Service* and 4.2.2 *ECC Joint Information Team Customer Relations Coordinator*; and **Attachment B1 Emergency Response Plan**, section 5. *Damage Assessment and Restoration Priorities*)

Requirement

- A. Within four hours of the identification of a major outage, PacifiCorp’s call centers will inform customers of the location of the outage, the cause of the outage, and the expected duration of the outage. Customers will be contacted by text, email, or phone call based on their preference.

If no preference is selected, an email will be sent, if an email address has been provided. If no email has been provided, a phone call will be made to the primary phone number on the account.

PacifiCorp's notification to and ongoing communication and coordination with state and local public agencies and the media are described in **Attachment B2 Annex 01 External Emergency Coordination and Communication**.

- B. PacifiCorp will distribute communications to media outlets and the general public with information regarding the nature of the outage, estimated restoration time and any other pertinent information within four hours of initial outage assessments. Tailored customer communications are sent as new information becomes available.
- C. PacifiCorp will continue to provide estimates of restoration times as soon as possible following an initial assessment of damage and the establishment of priorities for service restoration. When call volume exceeds the integrated voice response system capabilities, PacifiCorp will activate an external call handling system to divert some of the high call volume coming into the business centers and to prevent long queue times and busy signals.
- D. During a major outage, corporate communications will make proactive contact with the media to provide outage news releases. The releases will include the number of customers and areas affected, estimated duration of outage, and public electrical safety messages as applicable. PacifiCorp will notify essential customers, state and local public agencies and the media.

Restoration time estimates are generated automatically at initiation of outage based on the outage extent and an algorithm of historically similar events. During an emergency or disaster, automated restoration estimates are often disabled, and estimates are updated manually on an ongoing basis for the duration of the emergency or disaster. Customers are informed of restoration time estimates via PacifiCorp's Outage Map. In addition, updates are posted on social media, customer specific restoration time estimates are communicated by outbound call, e-mail, or text notification for the duration of the emergency or disaster.

- E. **Attachment B2 Annex 01 External Emergency Coordination and Communication** is compatible with the documents in **Exhibit D Public Safety Power Shutoff Execution**

Standard 9 - Personnel Redeployment Planning Standard

PacifiCorp trains field personnel both on electronic tools use and roles for safety standby and damage assessment. Safety standby and damage assessment is extended to journeymen linemen, journeymen substation personnel, journeymen estimators and where needed contract line resources when a major event is anticipated. In order to ensure adequate personnel PacifiCorp also augments with internal personnel from adjacent districts in Southern Oregon for safety standby, augmentation to local personnel on safety standby, and to deploy additional for damage assessment and restoration activities.

PacifiCorp utilizes its Line Services Agreement partnership to stage and utilize contract resources and vegetation management resources to augment and support both damage assessment and

improve repair and response times beyond internal resource capabilities in a disaster or major event.

Standard 10 - Annual Pre-Event Coordination Standard

PacifiCorp is a member of several mutual assistance organizations that are incorporated into regular activation processes and regularly update methods of communications and contacts. PacifiCorp coordinates with the Northwest Power Pool and all neighboring entities throughout the grid.

PacifiCorp routinely updates and exchanges contact information with state, county, and local agencies and engages in planning, trainings and exercises as described in **Attachment B1 Emergency Response Plan**, section 8. *Integrated Preparedness Plan*.

Standard 11 - Annual Report

PacifiCorp is in compliance with GO 166, with the submission of this annual report which includes the Company’s Emergency Response Plan, updated in April 2024. The 2024 plan updates are listed in above in Table 1: Description of Changes.

The number of repair and maintenance personnel in each personnel classification, identified by county (and throughout the company) is updated and provided in Table 2 below.

Table 2: Number of Pacific Power Repair and Maintenance Personnel (Dec. 31, 2023)

Location	Number of Personnel
Alturas	1
Crescent City	9
Mt. Shasta	2
Yreka	21
Total California Service Territory	36
Total within 2 hour travel time to California Service Territory	125

Standard 12 – Restoration performance benchmark for a measured event.

As a utility with fewer than 150,000 electric customers, PacifiCorp is exempt from Standard 12 of GO 166.

Standard 13 – Call center performance benchmark for a measured event.

As a utility with fewer than 150,000 electric customers, PacifiCorp is exempt from Standard 13 of GO 166.

Standard 14 – Plan Development Coordinating and Public Meeting

In addition to the wide range of coordination activities that informed this plan’s update, PacifiCorp presented to external partners at the California Wildfire Advisory Board meeting on March 20,

2024, and at the Modoc Disaster Council meeting on April 18, 2024. Feedback was solicited in both verbal and written formats. Feedback during these meetings, combined with feedback gathered throughout 2023 from public safety partners confirmed that PacifiCorp plans are in alignment with county and local plans.

Table 3:
Table of Contents

Item	Supporting Documents	Compliance Purpose/ Relevant Standard
Attachment A – PacifiCorp Annual GO 166 Compliance Report Year Ending December 31, 2023	See below	Describes how PacifiCorp has complied with Standards 1 and 11
Attachment B – PacifiCorp’s Emergency Response Plan describes the key activities to be addressed in response to an emergency incident or planned event	Annex 01 External Emergency Coordination and Communication	Provides PacifiCorp’s Emergency Response Plan and supporting documentation in compliance with Standard 1
Exhibit A – Mutual Assistance Agreements	<p>Exhibit A1 California Utilities Emergency Association (CUEA) Mutual Assistance Agreement Among Members of the</p> <p>Exhibit A2 CUEA PacifiCorp signature Page</p> <p>Exhibit A3 Intercompany Mutual Assistance Agreement signed</p> <p>Exhibit A4 Western Region Mutual Assistance (WRMAG) Agreement</p> <p>Exhibit A5 WRMAG PacifiCorp’s signature page</p>	Provides PacifiCorp’s inter-company and inter-utility mutual assistance agreements, in compliance with Standard 2
Exhibit B – California Exercise Documents from a tabletop exercise on March 28, 2023, and a functional exercise, May 15-18, 2023	<p>Exhibit B1 PacifiCorp 2023 Siskiyou County PSPS FE After Action Report</p> <p>Exhibit B2 PacifiCorp 2023 Siskiyou County PSPS TTX Presentation</p> <p>Exhibit B3 PacifiCorp 2023 Siskiyou County PSPS TTX After Action Report</p>	Provides presentation slides, exercise evaluation report (after action report) and additional documentation in compliance with Standard 3

	<p>Exhibit B4 PacifiCorp 2023 Siskiyou County PSPS FE Presentation</p> <p>Exhibit B5 PacifiCorp 2023 Siskiyou County FE Participant Guide</p> <p>Exhibit B6 PacifiCorp 2023 Siskiyou County PSPS TTX Notes</p> <p>Exhibit B7 PacifiCorp 2023 Siskiyou County FE Exercise Plan</p>	
Exhibit C – California Wildfire Mitigation Plan	Exhibit C PacifiCorp’s 2023-2025 Wildfire Mitigation Plan originally filed May 8, 2023; revised and refiled February 22, 2024	Provides 2023-2025 WMP, in compliance with Standard 1E
Exhibit D – Public Safety Power Shutoff Execution	<p>Exhibit D1 Public Safety Power Shutoff Execution Playbook 2024</p> <p>Exhibit D2 Community Resource Center Plan 2024</p> <p>Exhibit D3 Access and Functional Needs Plan 2024</p>	Documents describing the company’s process for PSPS events and supplement procedures for California
Exhibit E –External Partner Engagement	<p>Exhibit E1 PacifiCorp CA Wildfire Advisory Board March 2024</p> <p>Exhibit E2 PacifiCorp CA Modoc Disaster Council April 2024</p>	PowerPoint presentations for external partner feedback on the Emergency Response Plan update in compliance with Standard 14

Please direct any informal questions regarding this filing to Pooja Kishore, Regulatory Affairs Manager, at (503) 813-7314.

DATED: April 30, 2024

Respectfully submitted,



Mathew McVee
Vice President, Regulatory Policy and Operations
PacifiCorp