

**BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF CALIFORNIA**

Order Instituting Rulemaking to Implement Electric  
Utility Wildfire Mitigation Plans Pursuant to Senate  
Bill 901 (2018).

Rulemaking 18-10-007  
(Filed October 25, 2018)

**PACIFICORP'S REPLY COMMENTS  
REGARDING 2021 WMP UPDATE**

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April 21, 2021

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PacifiCorp d/b/a Pacific Power (“PacifiCorp” or “Company”) submits these Reply Comments in relation to PacifiCorp’s California Wildfire Mitigation Plan Update, submitted March 5, 2021 (“2021 WMP Update”), specifically in response to the Comments of the Public Advocates Office on the 2021 Wildfire Mitigation Plan Updates of the Small and Multijurisdictional Electric Utilities, submitted on April 14, 2021 (“Public Advocates’ Comments”).

While PacifiCorp believes that the 2021 WMP Update provides sufficient detail to satisfy all statutory and regulatory requirements, PacifiCorp also recognizes that the planning process frequently involves an iterative exchange of ideas, data, and developments. Along these lines, PacifiCorp appreciates the input provided in the Public Advocates’ Comments and looks forward to future engagement on the issues raised therein. At this juncture, PacifiCorp will simply comment on the procedural mechanisms implicated in the recommendations made by the Public Advocates Office. Certain of the recommendations proposed in the Public Advocates’ Comments contemplate a response deadline based on a discrete number of days. PacifiCorp typically endorses a technical workshop format, which allows for an immediate “question and answer”

exchange, as the best mechanism to address many issues and questions reflecting requests for clarification. To the extent that the Wildfire Safety Division incorporates any of the recommendations proposed in the Public Advocates' Comments to require responses in filed documents, PacifiCorp merely suggests that timeframes and deadlines for any written responses be integrated into the existing structure for quarterly and annual reporting for compliance review, developed by the Wildfire Safety Division and explained in the Compliance Operational Protocols, dated February 16, 2021. This structure provides efficiency by organizing deadlines on a predictable quarterly basis, as set forth in Figure 1 to the Compliance Operational Protocols.

Respectfully submitted,

/s/ Tim Clark

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