

December 17, 2015

*VIA ELECTRONIC MAIL*

Elizaveta Malashenko  
Director, Safety Enforcement Division  
California Public Utilities Commission  
505 Van Ness Avenue  
San Francisco, CA 94102-3298  
[eim@cpuc.ca.gov](mailto:eim@cpuc.ca.gov)

**RE: PacifiCorp (U 901 E) Response to Safety Enforcement Division (SED)  
Inquiry on Increased Hazards Due to El Niño**

Dear Ms. Malashenko:

In a letter dated December 1, 2015, the California Public Utilities Commission's (CPUC) Safety and Enforcement Division (SED) directed PacifiCorp to address certain areas of concern on the Increased Hazards Due to El Niño. In response, PacifiCorp d/b/a Pacific Power (PacifiCorp or Company) provides the following information:

- 1) Identify any specific areas of concerns relating to El Niño, either particular areas or particular equipment or infrastructure, that your company has identified and the steps being taken to address those concerns.**

PacifiCorp's California facilities include generating stations, dams, transmission and distribution lines and substations. Areas of concern are specific to the facility and the location. For dams, spillway gates are a critical facility component for PacifiCorp's hydro assets during high runoff conditions. As required by the Federal Energy Regulatory Commission (FERC), annually PacifiCorp performs a test to determine that each spillway gate will open. Every fifth year the testing includes performing full open tests for each gate. Particular substations where historic run-off or nearby flooding has been observed have been identified and are monitored on a case by case basis. If conditions deteriorate and substations are found to be at risk of flooding, sand-bagging or other protective measures will be taken. If those measures are insufficient the potential for planned interruptions could occur. Such actions will be communicated using PacifiCorp's established protocols as outlined in its Emergency Action Plan.<sup>1</sup>

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<sup>1</sup> The Annual General Order 166 report is filed with the California Public Utilities Commission by October 31 as required by D.96-11-004.

**2) Identify any specific actions or approvals that your company expects to request from the CPUC to prepare for, or respond, to El Niño and related conditions.**

At this time no specific actions or approvals have been identified. If conditions worsen and the need arises to notify the CPUC that PacifiCorp is activating its Catastrophic Events Memorandum Account, PacifiCorp would follow the established protocol for such actions.

**3) Describe any inventories build up that is specific for El Niño.**

PacifiCorp has not identified any specific inventory particular to El Niño.

**4) Describe any agreements with other agencies and utilities to address potential damages and hazards that are caused by El Niño.**

On an ongoing basis PacifiCorp collaborates and coordinates with emergency response personnel. It closely monitors weather conditions in concert with the National Weather Service and uses this information to inform operations and engineering teams of the need for particular actions. In the event of expected significant weather impacts, these forecasts are reviewed and pre-staged when appropriate. Further, PacifiCorp participates in a variety of agreements (including mutual assistance agreements which are provided annually in PacifiCorp's GO166 filing) to ensure that it is afforded an opportunity to access additional resources available across PacifiCorp and the country. Further, PacifiCorp maintains Emergency Action Plans (EAP) for JC Boyle, Copco, and Iron Gate dams in the event the dams experience damage and downstream evacuations are necessary. Drills and table-top exercises are conducted annually with emergency services agencies and a full functional exercise is conducted every five years. The EAPs include a high runoff notification procedure for instances when flows below Iron Gate dam exceed 12,000 cubic feet per second, with notifications including local county sheriffs' dispatch centers and the National Weather Service.

**5) Provide us all written plans detailing your company's preparations for El Niño and related conditions, including heavy rain and snow, mud or debris slides, flooding, river scour, river channel migration, and erosion.**

PacifiCorp maintains its emergency response plan elements in its Emergency Action Plan, which is filed annually, most recently on October 29, 2015. Certain particular facilities may have more extensive emergency actions plans, such as the plan required for the Klamath Hydroelectric Project. This plan is protected under Critical Energy Infrastructure Information. Access is protected by North American Electric Corporation (NERC) Reliability Standards (RS).

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If you have any questions, please contact Heide Caswell, Director Transmission and Distribution Asset Performance, at (503) 813-6216 or Cathie Allen, Regulatory Affairs Manager, at (503) 813-5934.

Sincerely,

A handwritten signature in black ink that reads "R. Bryce Dalley" followed by a stylized flourish.

R. Bryce Dalley  
Vice President, Regulation

Enclosures

Cc: Edward Randolph, CPUC, Director Energy Division  
Peter Allen, CPUC, Deputy Director SED  
Cynthia Walker, CPUC, Deputy Director Energy Division  
Charlotte TerKeurst, CPUC, Program Manager ESRB