

July 1, 2011

VIA OVERNIGHT DELIVERY

Paul Clanon, Executive Director
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102-3298

RE: PacifiCorp's (U 901-E) 2010 Annual Report of Inspection Activities Filed Pursuant to General Order No. 165

Pursuant to General Order No. 165, PacifiCorp provides an original and one (1) copy of the attached 2010 annual report of inspection activities for electric distribution facilities.

It is respectfully requested that all formal correspondence and Staff requests regarding this matter be addressed to:

By E-mail (preferred): datarequest@pacificorp.com

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

Informal inquiries may be directed to Cathie Allen, Regulatory Manager, at (503) 813-5934.

Sincerely,



Andrea L. Kelly
Vice President, Regulation

cc: Julie Fitch – CPUC
Jonathan Tom – CPUC
Jesse Ante – CPUC
Martin Nakahara – CPUC

TABLE A-1
2010 GENERAL ORDER 165 ANNUAL REPORT

Reporting Period: 01/01/10 - 12/31/10

PacifiCorp Wood Pole Inspections

Visual Assurance & Detail Inspections

DISTRICT	NO. OF FACILITIES		INSPECTION TYPE									
	Distribution Poles	Transmission Poles	O/H Safety (Patrol)	% Compliance Distribution [2]	% Compliance Transmission [2]	% Compliance (Dist. & Trans) [2]	% of Total Poles Inspected [3]	O/H Detail	% Compliance Distribution [2]	% Compliance Transmission [2]	% Compliance (Dist. & Trans) [2]	% of Total Poles Inspected [3]
Inspection Cycle			2 Yrs				50%	5 Yrs				20%
Tulelake	13,418	1,621	8,347	100%	97%	99%	56%	3,251	100%	95%	99%	22%
Alturas	4,142	1,104	2,754	100%	99%	100%	52%	1,422	100%	99%	100%	27%
Crescent City	9,370	1,644	7,226	100%	100%	100%	66%	3,294	100%	91%	99%	30%
Yreka/Mt. Shasta	35,052	5,666	23,833	100%	94%	99%	59%	8,851	100%	89%	98%	22%
Main Grid	0	1,688	5,007	NA	100%	100%	100%	1,688	NA	100%	100%	100%
California Totals	61,982	11,723	47,167			100%	64%	18,506			93%	25%

Notes:

- [1] Reporting unit basis for PacifiCorp is facility point
- [2] Percentage of compliance for the 2010 General Order 165 Annual Report for Visual Assurance & Detail inspections is based on a point by point analysis of the inspection records for each facility due comparing the last inspection date for each inspection type (visual assurance or detail inspection) through Dec. 31, 2010.
- [3] Percentage of total pole population inspected for the 2010 General Order 165 Annual Report in each District
 As of January 1, 2007, PacifiCorp initiated a project to identify, on an annual basis, all facilities out of compliance for visual assurance and detail inspections.
 a. PacifiCorp will ensure inspection compliance for all facilities using the maintenance inspection schedules outlined by Asset Management
 b. If it is concluded that a facility point is out of compliance for either inspection type (visual assurance or detail inspection) the facility will undergo the respective inspection type for compliance by December 31 of the reporting year.

Test and Treat (Intrusive) Inspections

DISTRICT	NO. OF FACILITIES		O/H Test & Treat (Intrusive) Inspection	% of Total Poles w/Intrusive Inspection [1]
	Distribution Poles	Transmission Poles		
Inspection Cycle			10 Yrs	7%
Tulelake	13,418	1,621	980	7%
Alturas	4,142	1,104	288	5%
Crescent City	9,370	1,644	630	6%
Yreka/Mt. Shasta	35,052	5,666	4,392	11%
Main Grid	0	1,688	0	0%
California Totals	61,982	11,723	6,290	9%

[1] Percentage of intrusive inspections completed for the 2010 General Order 165 Annual Report for Test and Treat (intrusive) inspections is based on a system-wide average of the number of inspections performed on the total population of facility points in each District.

TABLE A-2
2010 GENERAL ORDER 165 ANNUAL REPORT

Reporting Period: 01/01/10 - 12/31/10

PacifiCorp Line Equipment Inspections

District/Equipment	Type	QTY	Safety (Patrol) Rural ⁽¹⁾			Detailed Rural ⁽¹⁾		
			Plan ⁽²⁾ 2 Yrs	Actual	% Complete 50%	Plan ⁽²⁾ 4 or 5 Yrs	Actual	% Complete 20-25%
Tulelake								
Transformers	Overhead	2,613	1,621	2,129	62%	633	828	24%
Switch/Protect Device	Overhead	783	486			190		
Regs/Caps	Overhead	53	33			13		
All	Pad Mounted	84	52	66	79%	23	38	46%
Total			2,191	2,195	62%	859	867	25%
Alturas								
Transformers	Overhead	1,072	554	637	51%	210	235	19%
Switch/Protect Device	Overhead	175	90			34		
Regs/Caps	Overhead	3	2			1		
All	Pad Mounted	46	9	14	29%	2	6	14%
Total			655	650	50%	247	241	19%
Crescent City								
Transformers	Overhead	3,486	2,008	3,524	63%	765	1,650	29%
Switch/Protect Device	Overhead	2,103	1,211			461		
Regs/Caps	Overhead	5	3			1		
All	Pad Mounted	1,214	569	700	58%	348	368	30%
Total			3,791	4,224	62%	1,575	2,019	30%
Yreka/Mt. Shasta								
Transformers	Overhead	9,169	5,571	10,175	63%	2,256	3,895	24%
Switch/Protect Device	Overhead	6,584	4,001			1,620		
Regs/Caps	Overhead	281	171			69		
All	Pad Mounted	3,502	1,143	1,017	29%	677	173	5%
Total			10,886	11,192	57%	4,623	4,068	21%
California Totals								
Transformers	Overhead	16,340	9,754	16,464	63%	3,864	6,608	25%
Switch/Protect Device	Overhead	9,645	5,788			2,306		
Regs/Caps	Overhead	342	208			84		
All	Pad Mounted	4,846	1,773	1,797	37%	1,050	586	12%
Total			17,522	18,261	59%	7,303	7,194	23%

NOTES:

[1] PacifiCorp has no Urban area in its California service territory.
Urban is defined as those areas with a population of more than 1,000 persons per square mile and Rural as those with a population less than 1,000 persons per square mile as determined by the U.S. Bureau of the Census.

U. S. Bureau of the Census reports the population densities below (using 2006 Estimated Census data)

7.1 persons/sq.mi.	Siskiyou County (Tulelake, Yreka, Mt. Shasta)
28.7 persons/sq.mi.	Del Norte County (Crescent City)
2.4 persons/sq.mi.	Modoc County (Alturas)

[2] Planned inspection cycle:	<u>Patrol</u>	<u>Detailed</u>
Overhead	2 years	5 years
Pad Mounted	2 years	4 years

[3] Percentage complete for Safety (Patrol) and Detail Inspections for line equipment is based on a system wide percentage of inspections performed on the total population of facility points in each District.

TABLE B-1
2010 GENERAL ORDER 165 ANNUAL REPORT

Reporting Period: 01/01/10 - 12/31/10

PacifiCorp Wood Pole Conditions

DISTRICT	CONDITIONS FOUND			CONDITIONS CORRECTED			REMOVED FROM SYSTEM			CONDITIONS OUTSTANDING			REASON WHY CORRECTION IS OUTSTANDING	DATE CORRECTION WILL BE COMPLETED BY
	A	B	C	A	B	C	A	B	C	A	B	C		
Tulelake	0	18	2	1	59	1	0	0	0	0	42	98	B and C conditions planned to be completed per attached policy, effective 3/31/2009	Per note
Alturas	1	7	0	0	10	6	0	1	9	1	67	42	A condition is a foreign pole owned by telecommunications company. Received approval to replace pole from owner on 6/20/11. Estimated to be completed by 7/1/11. B and C conditions planned to be completed per attached policy, effective 3/31/2009	Per note
Crescent City	9	24	0	12	38	41	0	2	7	0	123	0	B and C conditions planned to be completed per attached policy, effective 3/31/2009	Per note
Yreka/Mt. Shasta	57	155	6	53	93	0	2	21	5	7	484	69	A conditions cleared in 2011. B and C conditions planned to be completed per attached policy, effective 3/31/2009	Per note
California Total	67	204	8	66	200	48	2	24	21	8	716	209		

PacifiCorp Street Light Conditions

DISTRICT	CONDITIONS FOUND			CONDITIONS CORRECTED			REMOVED FROM SYSTEM			CONDITIONS OUTSTANDING			REASON WHY CORRECTION IS OUTSTANDING	DATE CORRECTION WILL BE COMPLETED BY
	A	B	C	A	B	C	A	B	C	A	B	C		
Tulelake	0	0	34	0	0	0	0	0	3	0	0	44	C conditions planned to be completed per attached policy, effective 3/31/2009	Per note
Alturas	0	0	11	0	2	0	0	0	0	0	0	26	B and C conditions planned to be completed per attached policy, effective 3/31/2009	Per note
Crescent City	0	2	31	0	2	8	0	0	3	0	2	66	B and C conditions planned to be completed per attached policy, effective 3/31/2009	Per note
Yreka/Mt. Shasta	0	8	73	0	18	17	0	8	18	0	71	262	B and C conditions planned to be completed per attached policy, effective 3/31/2009	Per note
California Total	0	10	149	0	22	25	0	8	24	0	73	398		

TABLE B-2
2010 GENERAL ORDER 165 ANNUAL REPORT

Reporting Period: 01/01/10 - 12/31/10

PacifiCorp Equipment Conditions

DISTRICT	Type	CONDITION RATING FOUND			CORRECTIVE ACTIONS COMPLETED			REMOVED FROM SYSTEM			CONDITIONS OUTSTANDING			REASON WHY CORRECTION IS OUTSTANDING	DATE CORRECTION WILL BE COMPLETED BY
		A	B	C	A	B	C	A	B	C	A	B	C		
Tulelake															
Transformers	Overhead	7	15	4	7	0	0	0	0	0	0	15	9	B and C conditions planned to be completed per attached policy, effective 3/31/2009	Per note
Switch/Protect Device	Overhead	1	0	0	1	0	0	0	0	0	0	0	0		
Regs/Caps	Overhead	0	2	0	0	1	0	0	0	0	0	1	0	B conditions planned to be completed per attached policy, effective 3/31/2009	Per note
All	Padmounted	2	6	0	2	0	0	0	0	0	0	6	0	B conditions planned to be completed per attached policy, effective 3/31/2009	Per note
Alturas															
Transformers	Overhead	1	5	3	1	0	0	0	0	0	0	5	3	B and C conditions planned to be completed per attached policy, effective 3/31/2009	Per note
Switch/Protect Device	Overhead	0	0	0	0	0	0	0	0	0	0	0	0		
Regs/Caps	Overhead	0	0	0	0	0	0	0	0	0	0	0	0		
All	Padmounted	0	0	0	0	0	0	0	0	0	0	0	0		
Crescent City															
Transformers	Overhead	2	8	2	1	8	25	1	0	7	0	6	37	B and C conditions planned to be completed per attached policy, effective 3/31/2009	Per note
Switch/Protect Device	Overhead	0	0	0	0	2	0	0	0	0	0	2	0	B conditions planned to be completed per attached policy, effective 3/31/2009	Per note
Regs/Caps	Overhead	0	0	0	0	0	0	0	0	0	0	0	0		
All	Padmounted	0	2	0	0	3	0	0	0	0	0	1	0	B conditions planned to be completed per attached policy, effective 3/31/2009	Per note
Yreka															
Transformers	Overhead	14	120	37	10	8	23	3	8	19	1	128	570	A condition cleared in 2011. B and C conditions planned to be completed per attached policy, effective 3/31/2009	Per note
Switch/Protect Device	Overhead	0	0	0	0	0	1	0	0	0	0	0	0	C conditions planned to be completed per attached policy, effective 3/31/2009	Per note
Regs/Caps	Overhead	0	0	0	0	0	0	0	0	0	0	0	2	C conditions planned to be completed per attached policy, effective 3/31/2009	Per note
All	Padmounted	3	1	1	3	2	0	0	1	0	0	19	5	B and C conditions planned to be completed per attached policy, effective 3/31/2009	Per note
Mt. Shasta															
Transformers	Overhead														
Switch/Protect Device	Overhead														
Regs/Caps	Overhead														
All	Padmounted														
CA Total															
Transformers	Overhead	24	148	46	19	16	48	4	8	26	1	154	619		
Switch/Protect Device	Overhead	1	0	0	1	2	1	0	0	0	0	2	0		
Regs/Caps	Overhead	0	2	0	0	1	0	0	0	0	0	1	2		
All	Padmounted	5	9	1	5	5	0	0	1	0	0	26	5		
California Totals		30	159	47	25	24	49	4	9	26	1	183	626		

**CALIFORNIA
CONDITION CORRECTION POLICY
Power Delivery Policy 192**

Author: Tim Rasmussen
Approval: Tony Rodrigues, Jack Vranish
Authoring Department: Asset Management
Approved Location: Pdxshrn104\shr04\Eng\Publications\DIS\POL
File Number-Name: 192-California Condition Correction.doc
Revision Number R0
Version date: 3/31/09

California Condition Correction Policy

1 Scope

The policies and work practices that follow apply to PacifiCorp's employees and contractors who address nonconforming facilities within the State of California.

Condition corrections included within this policy are those for which PacifiCorp is responsible. Condition correction timeframes for conditions attributable to other parties (such as communication infrastructure providers) do not have explicit deadlines.

These measures are intended to and shall be adequate to ensure conformance with California General Orders (GO) 95, 128 and 165, PacifiCorp Policies, Distribution Construction Standards, infringement by other utilities or individuals, defects, damage, potential hazards, and deterioration of the facilities which need to be corrected in order to maintain safe and reliable service. Items that are found to be nonconforming are considered out of compliance and shall be noted and entered into PacifiCorp's Facility Point Inspection (FPI) system.

2 References

California General Orders including GO's 95, 128 and 165

PacifiCorp Policy No. 009, Detailed Inspections for Transmission and Distribution Lines

PacifiCorp Policy No. 013, Wood Pole Test and Treat

PacifiCorp Procedure 069, Condition Dropdown Codes

PacifiCorp Safety Rules and Procedures

3 Condition Priority Assignments

Refer to PacifiCorp Policy No. 009, Detailed Inspections for Transmission and Distribution Lines, and Procedure 069, Dropdown codes for priority assignments and descriptions.

4 Condition Correction Timeframes

4.1 Conditions reported after December 31, 2008

Conditions reported after December 31, 2008 within the California service territory shall be corrected per the following timeframes:

Priority A: All A-conditions are to be made safe immediately. Those conditions deemed to have been made safe must be brought into any necessary further compliance within 30 days of discovery.

Exception 1: Poles determined by the pole test and treat program to be A-conditions shall be addressed in accordance with PacifiCorp policies and procedures within 90 days of discovery.

Exception 2: These timeframes do not apply where the record indicates a good faith effort to obtain access or other permissions to correct the condition has been made. A good faith effort includes current documentation of both written and personal contacts in order to effect the corrections.

Priority B: B-conditions are to be brought into compliance by the end of the fourth calendar year after discovery. For example a condition discovered on 6/30/2009 must be corrected by 12/31/2013.

Exception 1: This timeframe does not apply where the record indicates a good faith effort to obtain access or other permissions to correct the condition has been made. A good faith effort includes current documentation of both written and personal contacts in order to effect the corrections.

Priority C: C-conditions have no set timeframe for correction and will be addressed when scheduled work is performed at that facility point.

Priority D: D-conditions are considered to be conforming to code and do not have a regulatory timeline for being addressed. These conditions typically involve reliability issues that are recorded for engineering and planning purposes.

Priority G: G-conditions are considered to be conforming to code as required at the date of installation (grandfathered) and do not need to be addressed.

If an existing C, D or G condition has not been corrected by the next scheduled inspection, the status of the condition must be updated if it has worsened or changed sufficiently to merit re-prioritization. If a condition has remained unchanged from one inspection cycle to the next, then the original date of discovery should be maintained in the FPI database until made conforming. After a condition has been corrected, the FPI database must be updated to reflect the change.

4.2 Conditions reported prior to December 31, 2008

Conditions discovered prior to December 31, 2008 within the California service territory shall be corrected per the following timeframes:

Priority A: All A-conditions are to be made safe immediately. Those conditions deemed to have been made safe must be brought into any necessary further compliance within 30 days of discovery.

Exception 1: Poles determined by the pole test and treat program to be A-conditions shall be addressed in accordance with PacifiCorp policies and procedures within 90 days of discovery.

Exception 2: These timeframes do not apply where the record indicates a good faith effort to obtain access or other permissions to correct the condition has been made. A good faith effort includes current documentation of both written and personal contacts in order to effect the corrections.

Priority B: Many B conditions discovered prior to 2009 were prioritized prior to the implementation of the current “C”, “D” and “G” condition codes. As such there are B conditions which may be incorrectly prioritized based upon these new criteria. To address these issues all B conditions that remain outstanding shall be reviewed during their next scheduled detail inspection. These conditions shall be evaluated based upon the revised prioritization criteria and priorities changed to A, C, D, G or left as a B as required. Conditions that are reprioritized to an A, C, D or G shall have a new inspection date entered which will then be used to trigger correction timeframes per section 4.1 above. The inspection date of conditions which remain as a B priority shall remain unchanged. All B conditions discovered prior to December 31, 2008 that are not reprioritized shall be corrected by the end of the eighth calendar year after their discovery. For example a “B” condition discovered on 6/30/2006 and reconfirmed as a “B” during a detail inspection performed in 2011 must be corrected by 12/31/2014.

Exception 1: This timeframe does not apply where the record indicates a good faith effort to obtain access or other permissions to correct the condition has been made. A good faith effort includes current documentation of both written and personal contacts in order to effect the corrections.

Priority C: C-conditions have no set timeframe for correction and will be addressed when scheduled work is performed at that facility point.

Priority D: D-conditions are considered to be conforming to code and do not have a regulatory timeline for being addressed. These conditions typically involve reliability issues that are recorded for engineering and planning purposes.

Priority G: G-conditions are considered to be conforming to code as required at the date of installation (grandfathered) and do not need to be addressed.

If an existing C, D or G condition have not been corrected by the next scheduled inspection, the status of the condition must be updated if it has worsened or changed sufficiently to merit re-prioritization. If a condition has remained unchanged from one inspection cycle to the next, then the original date of discovery should be maintained in the FPI database until made conforming. After a condition has been corrected, the FPI database must be updated to reflect the change.