

Application No. 24-09-\_\_\_\_  
Exhibit PAC/100  
Witness: Allen Berreth

BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF CALIFORNIA

PACIFICORP

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Direct Testimony of Allen Berreth

September 2024

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1 **I. INTRODUCTION AND QUALIFICATIONS**

2 **Q. Please state your name, business address, and present position with PacifiCorp**  
3 **d/b/a Pacific Power (PacifiCorp or the Company).**

4 A. My name is Allen Berreth. My business address is 825 NE Multnomah Street, Suite  
5 1700, Portland, Oregon 97232. My present position is Vice President of Power  
6 Delivery Operations for PacifiCorp. I am responsible for the departments that support  
7 the operations, maintenance, and construction of PacifiCorp's transmission and  
8 distribution systems such as Investment Delivery, Finance, Real Estate, Joint Use,  
9 Facilities, and Vegetation Management.

10 **Q. Please briefly describe your education and business experience.**

11 A. I have a Bachelor of Science degree in Electrical Engineering with a focus in electric  
12 power systems from the University of Idaho and a Master of Business Administration  
13 from Utah State University. I have been Vice President of Transmission and  
14 Distribution Operations since October 2020. Prior to my current position, I have held  
15 positions in delivery assurance, asset management, work planning, business  
16 improvement, and field engineering since joining PacifiCorp in 1998.

17 **Q. Have you testified in previous regulatory proceedings?**

18 A. Yes, I have previously testified in regulatory proceedings in Utah, Washington,  
19 Oregon, and California.

20 **II. PURPOSE OF TESTIMONY**

21 **Q. What is the purpose of your testimony?**

22 A. The purpose of my testimony is to describe the impacts of the Smith River Complex  
23 and Happy Camp Complex fires which started in August 2023, impacting

1 transmission and distribution assets resulting in the de-energization of over 13,000  
2 customers for several days as emergency generation was established and provided  
3 temporary power over approximately three weeks until the wildfires were no longer  
4 threatening assets, repairs could be made, and normal service to customers could be  
5 restored. The wildfire response, temporary generation, and asset repair resulted in  
6 \$25.3 million in incremental Operations and Maintenance (O&M) costs and \$4.3  
7 million in capital costs on a California-allocated basis.

8 **III. AUGUST 2023 SMITH RIVER COMPLEX FIRE**

9 **Q. Please describe the Smith River Complex fire and its impact on service to**  
10 **PacifiCorp's customers.**

11 A. A heat wave across northern California from August 12 to 16, 2023 produced record  
12 high temperatures and dried vegetation creating extreme flammability values. A dry  
13 thunderstorm pattern moved over the region beginning Monday, August 14, 2023.  
14 This two-day storm produced approximately 4,500 mostly dry lightning strikes  
15 across northern California and southern Oregon. Of that, roughly 200 strikes in far  
16 northwest California resulted in 15 wildfires that combined to become the Smith  
17 River Complex.

18 On August 15, 2023, the Kelly and Holiday Fires were identified on both  
19 sides of a PacifiCorp transmission corridor where two, 115-kilovolt transmission  
20 lines provide service to Del Norte County. The transmission lines serve 12,957  
21 customer meters in Crescent City and surrounding communities, which is  
22 approximately 27,000 residents.

1           The Kelly and Holiday fires were integrated into the Smith River Complex,  
2           which grew by 13,000 acres without containment by August 18, 2023, when it  
3           became an immediate threat to energized transmission lines. This proximity posed a  
4           threat for firefighting efforts and personnel safety and risk. De-energization became  
5           necessary and was initiated at 3:30 pm on August 18, 2023.

6   **Q.    Was an Emergency Coordination Center (ECC) activated?**

7   A.    Yes, on August 16, 2023, the Pacific Power ECC was activated to provide operational  
8           response to the fire’s potential impact to infrastructure.

9   **Q.    What critical community infrastructure is in this area?**

10  A.    Critical community infrastructure in the area includes Sutter Coast Hospital, Pelican  
11           Bay Prison, municipal water, and sewer services, among other public and emergency  
12           services infrastructure.

13  **Q.    What actions did PacifiCorp take in advance of the fire reaching Company  
14           assets?**

15  A.    PacifiCorp coordinated infrastructure protection by clearing vegetation and adding  
16           fire retardant wrap or spray to transmission and distribution assets. A total of 1,677  
17           poles and associated vegetation clearing occurred.

18  **Q.    What actions did PacifiCorp take to provide service to customers during the  
19           duration that the transmission corridor was de-energized?**

20  A.    Over 183 individual residential and commercial generators were mobilized at the start  
21           of the event to ensure power was provided to medical baseline (MBL), self-identified  
22           access and functional needs (AFN), and critical infrastructure customers. Critical

1 infrastructure needs were coordinated with Del Norte County Emergency Operations  
2 Center. Generators were refueled on a regular cadence to ensure continuity of service.

3           Recognizing the potential outage duration and impact to the entire Del Norte  
4 County, within 24 hours of the de-energization, a mutual assistance contract was  
5 executed with Pacific Gas and Electric (PG&E) for temporary generation at the  
6 substation level. This mutual assistance resulted in the installation of 33, two-  
7 megawatt generators to energize all customers at the substation level. Mobilization  
8 began immediately and energization of substations began on August 21, 2023, and  
9 was complete on August 25, 2023. This resulted in energizing all area substations,  
10 and customers served except for Gasquet and Patrick’s Creek. These two  
11 communities were under evacuation orders due to the impacts of the wildfires. On  
12 September 2, 2023, those evacuations were lifted, and generator restoration was  
13 initiated for both areas.

14 **Q. In addition to the generator response, were any Community Resource Centers**  
15 **established?**

16 A. Yes, two Community Resource Centers (CRCs) were established to support the Smith  
17 River Complex. A Crescent City CRC opened on the evening of August 19 and  
18 closed at the end of operations on August 26th. The CRC served approximately 4,000  
19 individuals, providing water, ice, drinks, snacks and 150 charging stations. A  
20 Klamath / Yurok tribe CRC was opened on the afternoon of August 20th and closed  
21 at the end of operations on August 25th. The CRC served over 250 individuals  
22 providing similar services as the Crescent City CRC.

1 **Q. When was PacifiCorp allowed into the transmission corridor to assess damage**  
2 **and begin repairs?**

3 A. On September 1, 2023, PacifiCorp was allowed access by fire Incident Management  
4 Teams (IMT) into the impacted transmission corridor. On September 3, 2023,  
5 authorization was granted to complete repairs and inspect all remaining structures.

6 **Q. What assets were found to be damaged by the fire?**

7 A. As repair authority was granted, personnel identified wildfire damage to five  
8 transmission structures, 14 distribution poles, and identified 31 hazard trees for  
9 remediation. The transmission structures were located in rugged terrain, where  
10 specialized equipment and helicopter delivery of poles was necessary.

11 **Q. When were assets repaired and normal service restored?**

12 A. Repairs were complete by September 9, 2023. Upon repair completion, the transition  
13 from generator power back to the transmission service for each substation was  
14 completed on September 10, 2023.

15 **Q. Was a state of emergency declared?**

16 A. Yes. On August 29, 2023, Governor Newsom declared a state of emergency in  
17 response to the wildfires in Del Norte County.

18 **Q. Did PacifiCorp notify the California Public Utilities Commission (Commission)**  
19 **that it would start recording costs associated with the Smith River Complex**  
20 **Fire?**

21 A. Yes. On September 15, 2023, the Company notified the Commission that PacifiCorp  
22 had started recording costs for responding to the fire and the damages in the  
23 Company's CEMA.

1 **Q. Describe the costs incurred by PacifiCorp in response to the Smith River**  
2 **Complex Fire.**

3 A. All the costs for which recovery is requested were incurred by PacifiCorp in  
4 connection with this event. This includes the initial field monitoring response, pro-  
5 active wildfire resiliency actions (e.g. fire-retardant spray / wrap on structures and  
6 vegetation removal), temporary generator response (including both smaller generators  
7 for critical infrastructure and vulnerable customers impacted and larger substation  
8 level generators), establishing community resource centers, and the replacement of  
9 damaged asset costs.

10 **Q. Did this event meet the requirements for activating CEMA?**

11 A. Yes. The purpose of the CEMA is to record all costs incurred by the Company  
12 associated with catastrophic events. Under Resolution E-3238, CEMA may be used to  
13 record costs of: (a) restoring utility service to its customers; (b) repairing, replacing or  
14 restoring damaged utility facilities; and (c) complying with governmental agency  
15 orders in connection with events declared disasters by competent state or federal  
16 authority.

17 **Q. While a state of emergency declaration was ordered by Governor Newsom, was**  
18 **the local impact experienced within PacifiCorp's California service territory**  
19 **unusual enough to warrant this treatment?**

20 A. Yes. Extraordinary efforts were required of the Company to respond to the Smith  
21 River Complex fire and provide service for the multiple weeks where de-energization  
22 of the transmission corridor was necessary. The Company had to deploy a significant  
23 amount of additional resources to coordinate an unprecedented response of temporary



1 generation, provide resources for customers, and mitigate risks both before and  
2 during the fire event. To aid restoration efforts, PacifiCorp mobilized internal crews,  
3 as well as contract resources and resources under mutual assistance agreements.

4 **IV. AUGUST 2023 HAPPY CAMP COMPLEX FIRE**

5 **Q. Please describe the Happy Camp Complex fire and its impact on service to**  
6 **PacifiCorp's customers.**

7 A. The Happy Camp Complex fire started on August 15, 2023, during the same time  
8 period and under the same conditions described above for the Smith River Complex  
9 fire. The Happy Camp Complex fire was lightning-caused and was close enough to  
10 populated areas that local emergency services implemented an evacuation notice to  
11 residents and requested the de-energization of distribution lines and a 69-kilovolt  
12 transmission line in the impacted area. As requested, PacifiCorp de-energized assets  
13 on August 15, 2023, affecting 353 customers. The Happy Camp Complex fire  
14 eventually covered 29,948 acres before being fully contained on September 8, 2023.

15 **Q. Was an Emergency Coordination Center (ECC) activated?**

16 A. Yes, on August 16, 2023, the same Pacific Power ECC that was activated for the  
17 Smith River Complex fire provided operational response to the fire's potential impact  
18 to infrastructure.

19 **Q. What actions did PacifiCorp take in advance of the fire reaching Company**  
20 **assets?**

21 A. PacifiCorp coordinated infrastructure protection by clearing vegetation and adding  
22 fire retardant wrap or spray to transmission and distribution assets. A total of 236  
23 poles and associated vegetation clearing occurred.

1 **Q. What actions did PacifiCorp take to provide service to customers during the**  
2 **duration that the impacted area was de-energized?**

3 A. Once allowed into the area, PacifiCorp was able to sectionalize the impacted  
4 evacuated area and energize all customers as of August 25, 2023, via a large  
5 generator.

6 **Q. In addition to the generator response, were any Community Resource Centers**  
7 **established?**

8 A. Yes, a Community Resource Center (CRC) was established on the evening of August  
9 20 and closed at the end of operations on August 26th. The CRC served  
10 approximately 135 individuals, providing water, ice, drinks, snacks and charging  
11 stations.

12 **Q. When was PacifiCorp allowed into the transmission corridor to assess damage**  
13 **and begin repairs?**

14 A. PacifiCorp was allowed into the impacted area to begin assessments and repairs on  
15 August 27, 2023.

16 **Q. What assets were found to be damaged by the fire?**

17 A. Crews completed assessments, finding 23 damaged distribution poles and 18  
18 transmission structures.

19 **Q. When were assets repaired and normal service restored?**

20 A. By September 8, 2023, all damaged transmission and distribution structures were  
21 replaced and the system returned to normal configuration.

1 **Q. Was a state of emergency declared?**

2 A. Yes. On August 29, 2023, Governor Newsom declared a state of emergency in  
3 response to the wildfires in Del Norte and Siskiyou Counties.

4 **Q. Did PacifiCorp notify the California Public Utilities Commission (Commission)**  
5 **that it would start recording costs associated with the Happy Camp Complex**  
6 **fire?**

7 A. Yes. On September 15, 2023, the Company notified the Commission that PacifiCorp  
8 had started recording costs for responding to the fire and the damages in the  
9 Company's CEMA.

10 **Q. Describe the costs incurred by PacifiCorp in response to the Happy Camp**  
11 **Complex Fire.**

12 A. All the costs for which recovery is requested were incurred by PacifiCorp in  
13 connection with this event. This includes the initial field monitoring response, pro-  
14 active wildfire resiliency actions (e.g. fire-retardant spray / wrap on structures and  
15 vegetation removal), temporary generator response (including both smaller generators  
16 for critical infrastructure and vulnerable customers impacted and larger substation  
17 level generators), establishing a community resource center, and the replacement of  
18 damaged asset costs.

19 **Q. Did this event meet the requirements for activating CEMA?**

20 A. Yes. The purpose of the CEMA is to record all costs incurred by the Company  
21 associated with catastrophic events. Under Resolution E-3238, CEMA may be used to  
22 record costs of: (a) restoring utility service to its customers; (b) repairing, replacing or  
23 restoring damaged utility facilities; and (c) complying with governmental agency

1 orders in connection with events declared disasters by competent state or federal  
2 authority.

3 **Q. While a state of emergency declaration was ordered by Governor Newsom, was**  
4 **the local impact experienced within PacifiCorp's California service territory**  
5 **unusual enough to warrant this treatment?**

6 A. Yes. Extraordinary efforts were required of the Company to respond to the Happy  
7 Camp Complex fire and provide service during de-energization of the transmission  
8 and distribution. The Company had to deploy a significant amount of additional  
9 resources to coordinate response of temporary generation, provide resources for  
10 customers and mitigate risks both before and during the fire event. To aid restoration  
11 efforts, PacifiCorp mobilized internal crews as well as contract resources and  
12 resources under mutual assistance agreements.

## 13 V. CONCLUSION

14 **Q. Was PacifiCorp's response to the Smith River and Happy Camp Complex fires**  
15 **necessary and reasonable?**

16 A. Yes. The Company's response to the Smith River and Happy Camp Complex fires  
17 was necessary and reasonable. The magnitude and duration of impact that these  
18 wildfires represented required a corresponding level of immediate response by the  
19 Company. Without this level of engagement and response, the entirety of Del Norte  
20 County would have been without power for multiple weeks. The Company's  
21 necessary and reasonable response helped communities remain functional while local  
22 agencies responded to active wildfires in the area.

1 Q. Does this conclude your direct testimony?

2 A. Yes.