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February 26, 2020

## DATA REQUEST RESPONSE

LIBERTY UTILITIES (CALPECO ELECTRIC) LLC

R.18-10-007

Wildfire Mitigation Plan Rulemaking

Data Request No.: CalAdvocates-Liberty-2020WMP-02  
Requesting Party: Public Advocates  
Originator: Aaron Louie  
Date Received: February 21, 2020  
Due Date: February 26, 2020

### **REQUEST NO. 1:**

Does Liberty intend to complete and provide the information requested in:

- a) Attachment 2: Utility Wildfire Mitigation Maturity Model,
- b) Attachment 3: Utility Survey,
- c) Attachment 4: Wildfire Mitigation Plan Metrics, and
- d) Attachment 5: Supplemental Data Request.

For parts (a) through (d), if the answer is yes, please state when Liberty will provide the requested Attachments that accompany Liberty's 2020 Wildfire Mitigation Plan.<sup>1</sup>

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<sup>1</sup> *Administrative Law Judge's Ruling on Wildfire Mitigation Plan Templates and Related Material and Allowing Comment*, December 16, 2019 (December 16, 2019 WMP Guidelines), p. 3:  
"The full set of materials includes the following documents: ... 2. Utility Wildfire Mitigation Maturity Model, which describes a methodology and provides a framework for the utility filings, and a mapping of the WMP Guidelines to statutory requirements. 3. Utility Survey, which collects utility information relevant to the Utility Wildfire Mitigation Maturity Model. 4. WMP Metrics, which evaluates each utility's wildfire mitigation approach, progress, and results related to ongoing wildfire mitigation activities. 5. Supplemental Data Request, which outlines a broader set of data that the Commission is requesting from utilities and intends to formalize in requirements in the 2021 WMP process to evaluate utility plans, activities, and outcomes in greater detail."

**RESPONSE TO REQUEST NO. 1:**

- a) Liberty CalPeco does not intend to complete the Utility Wildfire Mitigation Maturity Model as it is the Wildfire Safety Division's ("WSD") assessment and scoring of Liberty CalPeco's WMP.
- b) Liberty CalPeco completed the Utility Survey on February 7, 2020 and uploaded the results on the CPUC's website. The survey results for Liberty CalPeco, and all other utilities, can be found at [www.cpuc.ca.gov/wildfiremitigationplans](http://www.cpuc.ca.gov/wildfiremitigationplans)
- c) Liberty CalPeco does not intend to complete the Wildfire Mitigation Plan Metrics since it merely outlines going forward data collection and future reporting by identified program metrics. There are no deliverables in Attachment 4.
- d) Liberty CalPeco will provide the Supplemental Data Requested for Attachment 5 by February 28, 2020.

**REQUEST NO. 2:**

Please provide the data requested for Table 8 of Liberty's 2020 Wildfire Mitigation Plan.<sup>2</sup>

**RESPONSE TO REQUEST NO. 2:**

The GIS map files requested for Tables 8 and 9 of Liberty CalPeco's 2020 WMP are uploaded on Liberty CalPeco's Wildfire Mitigation webpage at <https://california.libertyutilities.com/north-lake-tahoe/residential/safety/electrical/wildfire-mitigation.html>.

**REQUEST NO. 3:**

Please provide the data requested for Table 9 of Liberty's 2020 Wildfire Mitigation Plan.<sup>3</sup>

**RESPONSE TO REQUEST NO. 3:**

Please see response to question 2.

**REQUEST NO. 4:**

Please provide the explanation and summary for Section 5.1.B in Liberty's 2020 Wildfire Mitigation Plan.<sup>4</sup>

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<sup>2</sup> December 16, 2019 WMP Guidelines, Attachment 1, WMP Guidelines, p. 25, Table 8.

<sup>3</sup> December 16, 2019 WMP Guidelines, Attachment 1, WMP Guidelines, p. 26, Table 9.

<sup>4</sup> Liberty 2020 Wildfire Mitigation Plan, p. 49. See also, December 16, 2019 WMP Guidelines, Attachment 1, p. 48.

**RESPONSE TO REQUEST NO. 4:**

Please see the discussion included in Section 2.1 for the major themes of lessons learned from the 2019 WMP and how this shaped the development of Liberty CalPeco's 2020 WMP. See attached file "WMP – Section 5.1.B Table" for the WMP summary table.

Liberty CalPeco will include the explanation and summary table missing from this section in its updated 2020 WMP.

**REQUEST NO. 5:**

Please explain or correct the table on page 114 in Liberty's 2020 Wildfire Mitigation Plan.

**RESPONSE TO REQUEST NO. 5:**

Please see attached file "WMP p.114 Table" for the complete table.

**REQUEST NO. 6:**

Please provide the explanation and summary for Section 5.3.5.17 (Substation Inspections) in Liberty's 2020 Wildfire Mitigation Plan.<sup>5</sup>

**RESPONSE TO REQUEST NO. 6:**

Please see the discussion on Substation Inspections in section 5.3.4.15.

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<sup>5</sup> Liberty 2020 Wildfire Mitigation Plan, p. 104. See also, December 16, 2019 WMP Guidelines, Attachment 1, p. 60-61.

Item #	Wildfire Mitigation Category	WMP Initiative	Recorded	Forecast			Total
			2019	2020	2021	2022	
1	Situational Awareness	Advanced Weather Monitoring and Weather Stations	199,297	300,000	300,000	15,000	814,297
2	Situational Awareness	Continuous Monitoring Sensors	-	-	706,000	162,000	868,000
3	Situational Awareness	Fire Potential Index	-	70,000	10,000	10,000	90,000
4	Situational Awareness	ALERTTahoe	-	80,000	80,000	80,000	240,000
		<b>Subtotal</b>	<b>199,297</b>	<b>450,000</b>	<b>1,096,000</b>	<b>267,000</b>	<b>2,012,297</b>
5	Grid Design & System Hardening	Covered Conductor Installation	550,000	3,198,000	8,337,000	9,734,000	21,819,000
6	Grid Design & System Hardening	Distribution Pole Replacement	300,000	-	-	-	300,000
7	Grid Design & System Hardening	Expulsion Fuse Replacement	170,000	1,544,000	1,544,000	1,544,000	4,802,000
8	Grid Design & System Hardening	Grid Topology Improvements	-	616,000	-	-	616,000
9	Grid Design & System Hardening	Install System Automation Equipment	-	360,000	540,000	360,000	1,260,000
10	Grid Design & System Hardening	Pole Loading Infrastructure Hardening	550,000	1,515,000	2,820,000	3,535,000	8,420,000
11	Grid Design & System Hardening	Undergrounding Overhead Lines (Rule 20A)	-	1,757,500	6,100,000	-	7,857,500
12	Grid Design & System Hardening	Tree Attachment Removal	244,148	600,000	600,000	600,000	2,044,148
13	Grid Design & System Hardening	Wire Upgrade Program	-	150,000	250,000	350,000	750,000
14	Grid Design & System Hardening	Repairs and G.O. 165 Outcome from System Survey	-	3,500,000	-	-	3,500,000
		<b>Subtotal</b>	<b>1,814,148</b>	<b>13,240,500</b>	<b>20,191,000</b>	<b>16,123,000</b>	<b>51,368,648</b>
15	Asset Management and Inspections	Detailed Inspections - Asset Survey and GIS Update	-	6,000,000	-	-	6,000,000
16	Asset Management and Inspections	Improvements of Inspections	-	890,000	360,000	260,000	1,510,000
17	Asset Management and Inspections	Intrusive Pole Inspections	13,044	118,554	145,308	80,887	357,793
18	Asset Management and Inspections	LiDAR Inspections of Electric Lines and Equipment	-	250,000	300,000	300,000	850,000
		<b>Subtotal</b>	<b>13,044</b>	<b>7,258,554</b>	<b>805,308</b>	<b>640,887</b>	<b>8,717,793</b>
19	Vegetation Management	Additional Efforts to Manage Community and Environmental Impacts	-	660,000	660,000	660,000	1,980,000
20	Vegetation Management	Detailed Inspections of Vegetation around Lines and Equipment	450,000	610,000	556,000	570,000	2,186,000
21	Vegetation Management	Fuel Management and Reduction of "Slash"	-	2,000,000	2,500,000	2,500,000	7,000,000
22	Vegetation Management	Other Discretionary Inspection of Vegetation around Lines and Equipment	-	50,000	50,000	50,000	150,000
23	Vegetation Management	Other Vegetation Management	-	400,000	400,000	400,000	1,200,000
24	Vegetation Management	Patrol Inspections of Vegetation around Lines and Equipment	260,000	300,000	300,000	300,000	1,160,000
25	Vegetation Management	QA/QC of Inspections	-	250,000	250,000	250,000	750,000
26	Vegetation Management	Remediation of at-risk-Species	4,504,905	4,500,000	4,500,000	5,000,000	18,504,905
		<b>Subtotal</b>	<b>5,214,905</b>	<b>8,770,000</b>	<b>9,216,000</b>	<b>9,730,000</b>	<b>32,930,905</b>
27	Data Governance	Centralized Repository for Data	-	465,000	415,000	365,000	1,245,000
28	Data Governance	Collaborative Research on Utility Ignition/Wildfire	-	200,000	-	-	200,000
		<b>Subtotal</b>	<b>-</b>	<b>665,000</b>	<b>415,000</b>	<b>365,000</b>	<b>1,445,000</b>
29	Emergency Planning and Preparedness	Adequate and Trained Workforce	-	240,000	240,000	240,000	720,000
30	Stakeholder Cooperation and Community Engagement	Community Engagement	-	750,000	-	-	750,000
<b>GRAND TOTAL</b>			<b>7,241,394</b>	<b>31,374,054</b>	<b>31,963,308</b>	<b>27,365,887</b>	<b>97,944,643</b>

Level	Description	Action
5 Small Impact Event (Localized Response Condition)	Minor disruption of operating systems, business systems, or electric service that can be managed with existing resources at the local or department level.	Normal activity, daily internal crew assignments
4 Moderate Impact Event (Heightened Alert)	An event that maximizes the resources and management capability of the local region and may require additional resources and support.	Possible crew transfer between areas; utility contractor crews (overhead line and tree) limited to normal daily complement.
3 Serious Impact Event (Enhanced Support)	A disaster or major emergency that may affect several areas of our electric system and may require the services of all operations personnel.	Regional or System ICS may be initiated and Regional EOC's may be opened. All available operations personnel are utilized. Utility contractor, mutual aid Assistance, tree crews, and support functions such as logistics will be used as needed.
2 Major Impact Event (Comprehensive Support)	A disaster or major emergency that affects several areas of our electric system and requires the services of all operations personnel.	Regional or System ICS will be initiated. All available operations personnel are utilized. Utility contractor, mutual aid assistance, tree crews, and support functions such as logistics will be used as needed.
1 Catastrophic Impact Event (Emergency Support)	A disaster or major emergency requiring a corporate response to minimize corporate risk. This level requires policy guidance, strategic planning, and coordination of internal and external resources, internal communication and coordination, dissemination of public information.	Regional and/or system ICS will be initiated. All available operations personnel are utilized. Utility contractor, mutual aid assistance, tree crews, and support functions such as logistics will be used as needed.