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March 11, 2021

DATA REQUEST RESPONSE

LIBERTY UTILITIES (CALPECO ELECTRIC) LLC
2021 WMP Update

Data Request No.: CalAdvocates-Liberty-2021WMP-01A
Subject Matter: 2021 Wildfire Mitigation Plans
Originator: Henry Burton
Due Date: March 9, 2021

REQUEST NO. 1:

Please provide a list of all publicly owned electric utilities and electrical cooperatives (collectively, POUs) that you supply in part or whole.

RESPONSE TO REQUEST NO. 1:

Liberty does not supply power to any publicly owned utilities or electrical cooperatives.

REQUEST NO. 2:

For each publicly owned electric utility and electrical cooperative (collectively, POUs) to which you supply power, please respond to the following:

a) Have you coordinated with the POU to ensure resilience of the POU during a public safety power shutoff (PSPS) event that you initiate? Please describe the nature of this coordination if so.
b) In 2020, what coordination, planning, or other activities took place between you and the POU to mitigate the effect of a potential SCE-initiated PSPS event on the POU and its customers?

RESPONSE TO REQUEST NO. 2:

Liberty does not supply power to any publicly owned utilities and electrical cooperatives.

REQUEST NO. 3:

Regarding your wildfire risk model[1]:

[1] Wildfire risk model refers to a risk-estimation model that quantifies the wildfire risk level of your facilities.

a) Have you developed a risk-estimation model that quantifies the wildfire risk level of each of your circuits?
b) If the answer to question 3(a) is yes, explain the finest level physical granularity (i.e. individual equipment, pole/tower, circuit-segment, circuit) with which you assess the wildfire risk level of your facilities.
c) If the answer to question 3(a) is yes, explain the finest level of temporal granularity (i.e. day, week, month, year) with which you assess the wildfire risk level of your facilities.
d) How are transmission and distribution circuits treated differently in the model referred to in question 3(a)?
e) Does the model in question 3(a) allow you to rank circuits or circuit-segments by risk level?
f) Does the model in question 3(a) rank transmission and distribution circuits together or separately?
g) Are your wildfire risk model's outputs for transmission and distribution circuits comparable to each other?

RESPONSE TO REQUEST NO. 3:

a) Yes.
b) Circuit level.
c) Circuit level.
d) They are treated the same.
e) Yes.
f) Together.
g) Yes. Please see Liberty's 2021 WMP Update, Attachment C, Table C-4: Circuit Risk.

REQUEST NO. 4:

Provide an Excel table of all distribution circuits existing in 2020 (as rows) that includes the requested information in separate columns. Items (a) through (k) are features of the circuit. Items (l) through (ggg) pertain to work performed for each circuit.

RESPONSE TO REQUEST NO. 4:

See Attached Excel File, Tab Q4.

REQUEST NO. 5:

Provide an Excel table of all transmission circuits (as rows) that includes the same information listed above in Question 4(a)-(ggg).

RESPONSE TO REQUEST NO. 5:

See Attached Excel File, Tab Q5.

REQUEST NO. 6:

For each WMP initiative listed below, please state how the Wildfire Risk Levels provided in the Excel spreadsheet for Questions 4 and 5 influenced where you performed work in 2020 and how work was sequenced.

a) EVM
b) Covered conductor installation
c) Pole replacement
d) Undergrounding
e) Grid sectionalization
f) Detailed inspections of distribution assets
g) Detailed inspections of transmission assets
h) Aerial inspections of transmission assets
i) Aerial inspections of distribution assets
j) LiDAR inspections of distribution assets
k) LiDAR inspections of transmission assets

RESPONSE TO REQUEST NO. 6:

Wildfire Risk Levels did not influence where Liberty performed work in 2020 because the risk levels were not developed until 2021.

REQUEST NO. 7:

For each WMP initiative listed below, please complete Table A below, showing how much of the work you completed in 2020 was performed on distribution circuit-segments in each risk quintile.

a) EVM
b) Covered conductor
c) Pole replacement
d) Undergrounding
e) Grid sectionalization
f) Climbing inspections
g) Aerial inspections
h) LiDAR inspections

RESPONSE TO REQUEST NO. 7:

See Attached Excel File, Tab Q7.

REQUEST NO. 8:

For each WMP initiative listed below, please complete Table A below, showing how much of the work you completed in 2020 was performed on transmission circuit-segments in each risk quintile.

a) EVM
b) Covered conductor
c) Pole replacement
d) Undergrounding
e) Grid sectionalization
f) Climbing inspections
g) Aerial inspections
h) LiDAR inspections

RESPONSE TO REQUEST NO. 8:

See Attached Excel File, Tab Q8.

REQUEST NO. 9:

Regarding you PSPS circuit modeling capabilities:

a) Please describe your present circuit modeling capabilities with regard to PSPS thresholds ("PSPS circuit modeling capabilities"), including with what level of granularity they are able to determine how circuit hardening efforts or other changes to a line segment will affect PSPS thresholds.
b) Please describe any improvements to the present PSPS circuit modeling capability that you expect to enact in 2021.
c) Please describe the expected state of your PSPS circuit modeling capabilities at the conclusion of the 2020-2022 WMP cycle.

RESPONSE TO REQUEST NO. 9:

For part a) of Question 9, please see the attached "De-Energization Thresholds for Prevention of Catastrophic Wildfires." For parts a-c, refer to Liberty's 2021 WMP Update, Section 8: PSPS, Including Directional Vision for PSPS.

REQUEST NO. 10:

For each program identified in WMP section 5.3, Plan Program Targets:

a) Provide the annual program targets from the year 2019 onward as identified in the 2019 WMP filing.
b) Provide the annual program targets from the year 2020 onward as identified in the 2020 WMP filing.
c) List the actual work completed for 2019.
d) List the actual work completed for 2020.

RESPONSE TO REQUEST NO. 10:

a) Refer to Liberty's 2019 WMP filing, Section 4: Wildfire Prevention Strategy and Programs and Appendix A: Wildfire Mitigation Strategies and Programs.
b) Refer to Liberty's 2020 WMP filing, Section 5.3: Detailed Wildfire Mitigation Programs.
c) Refer to Liberty's 2020 WMP filing, Section 5.3: Detailed Wildfire Mitigation Programs.
d) Refer to Liberty's 2021 WMP filing, Section 7.3: Detailed Wildfire Mitigation Programs.

REQUEST NO. 11:

For each mitigation initiative identified in WMP section 7.3.1, Financial data on mitigation initiatives:

a) Provide the spending forecasts from the year 2019 onward as identified in the 2019 WMP filing.
b) Provide the spending forecasts from the year 2020 onward as identified in the 2020 WMP filing.
c) Provide the actual spending for 2019.
d) Provide the actual spending for 2020.

RESPONSE TO REQUEST NO. 11:

a) Refer to Liberty's 2019 WMP filing, Section 4: Wildfire Prevention Strategy and Programs, Section 7: Potential Cost Implications, and Appendix A: Wildfire Mitigation Strategies and Programs.
b) Refer to Liberty's 2020 WMP filing, Section 5.1.B: Wildfire Mitigation Strategy and Section 5.3: Detailed Wildfire Mitigation Programs.
c) Refer to Liberty's 2020 WMP filing, Section 5.1.B: Wildfire Mitigation Strategy and Section 5.3: Detailed Wildfire Mitigation Programs.
d) Refer to Liberty's 2021 WMP filing, Table 12 in Attachment A: WMP Performance Metrics Data.

REQUEST NO. 12:

Please identify and provide a copy of all quality assurance or quality control (QA/QC) reports — conducted by both internal and external entities — that were completed since January 1, 2020 and that examined any programs, initiatives, or strategies described in your 2020 Wildfire Mitigation Plan. External entities include, but are not limited to, contractors, auditors, and Independent Evaluators.

RESPONSE TO REQUEST NO. 12:

Two confidential audit reports were developed for Liberty's Vegetation Management program in 2020. Liberty will provide the audit reports once PAO has signed the attached non-disclosure agreement.

As discussed in Section 7.2.C of Liberty's 2021 WMP Update, Liberty has or is planning QA/QC programs to monitor and audit the effectiveness of its inspection programs. For vegetation management, Liberty maintains and implements a robust scheduling process in order to meet compliance inspection requirements. Most of the maintenance work for vegetation management (pre-inspection, pruning, and tree removals) is performed by contractors and not by Liberty employees. On an annual basis, over 10,000 trees are identified for work, and there is a need to track work performed and associated business processes and to standardize a formal QA/QC program for Liberty. Since the last WMP, Liberty has consulted with regional industry experts to develop such a QA/QC program that includes statistical sampling of vegetation management inspections by annual circuit miles and a formal post work verification process control.

For the WMP asset inspection programs, Liberty plans to develop an inspection auditing program through an RFP process in 2021 to be implemented in 2022. Additionally, operation managers will be spot auditing new construction.

REQUEST NO. 13:

Provide an Excel table of all defects in the year 2020 found by the Wildfire Safety Division's Compliance Branch (as rows) that includes the following information in separate columns.

a) Associated Circuit Name
b) Defect Type
c) Description of defect
d) WMP initiative associated with defect
e) Date that defect was identified
f) Date that defect was corrected
g) Priority level of corresponding corrective tag
h) Location of defect (latitude/longitude)

RESPONSE TO REQUEST NO. 13:

See Attached Excel File, Tab Q13.

If you have any questions or require any additional information, please contact me at:

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