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April 1, 2021

DATA REQUEST RESPONSE

LIBERTY UTILITIES (CALPECO ELECTRIC) LLC
2021 WMP Update

Data Request No.: CalAdvocates-Liberty-2021WMP-02
Subject Matter: 2021 Wildfire Mitigation Plans
Originator: Henry Burton
Due Date: April 1, 2021

REQUEST NO. 1:

Please provide Tables 1-12 of Liberty's 2021 WMP in an Excel format.

RESPONSE TO REQUEST NO. 1:

See attached Excel file, "WMP Performance Metrics Data_20210305_FINAL"

REQUEST NO. 2:

a) Does Liberty currently have a GIS map of each of its circuits?
b) If the answer to part (a) is no, does Liberty have other granular data (aside from the Reax polygons shown in the February 23, 2021 workshop) that shows where each circuit is located within its HFTD Tier 2 and 3 areas and what the circuit's risk level is according to Liberty's risk assessment (low, moderate, high, or very high)?
c) If the answer to part (a) is no, when does Liberty plan to have that ability?

RESPONSE TO REQUEST NO. 2:

a) Yes.

b) N/A

c) N/A

REQUEST NO. 3:

a) Please explain how Liberty developed the regions/polygons that REAX Engineering used for risk analysis.

b) Was all work related to developing the risk analysis regions/polygons done by Reax Engineering?
c) If not, please explain what contributions Liberty personnel made to the aid in developing the regions/polygons for risk analysis.

RESPONSE TO REQUEST NO. 3:

a) The applied methodology for estimating suppression cost recovery is a function of potential fire size combined with drivers that can be spatially defined in relation to the ignition point and final burn perimeter, including location of fire stations, fuels, accessibility (i.e., terrain and roadway access), and structure density. Environmental suppression cost drivers that more prominently fluctuate with time (i.e., wind, weather, fuel moisture) are intrinsically factored into modeled fire size. Management and decision-making drivers of suppression costs are assumed uniform across the service territory and are therefore not incorporated for this analysis.

   A qualitative assessment of incurring suppression costs was conducted by Reax, identifying ignition locations along Liberty powerlines whereby a resultant fire would lead to potentially significant suppression expenditure. A relative risk ranking method was used to prioritize ignition locations that would incur higher versus lower suppression recovery costs (segmented polygons). Contributing cost factors that were applied as criteria in determining relative risk of suppression costs from low, moderate, high, to very high.

   Liberty then worked with Reax to develop an Overall Wildfire Risk Rating within these segmented areas, which factored in the cost suppression criteria combined with the other financial and safety consequences mentioned below.

b) No. Liberty worked with Reax to develop the parameters of the consequences for what each unique fire risk area (polygons) were. Examples of parameters were number of people affected, sensitive habitats affected, and commercial value of structures affected from each polygon. These parameters contributed to the modeling of the financial and safety consequences in Liberty's wildfire risk model outcomes (as seen in the risk bow-tie structure). Additionally, Liberty worked with Reax to develop a reasonable threshold for which would constitute a "larger fire" in its service territory, which was determined to be 1,000 acres. This also factored into the company's risk bow-tie analysis and wildfire risk modeling efforts.

c) See response to Question 3b.

REQUEST NO. 4:

a) What (if any) are Liberty's Quality Assurance/ Quality Control processes in place to verify the quality of work done by contractors working on vegetation management mitigation measures (past and current)?
b) Are Liberty's QA/QC processes for vegetation management based only on a review of records kept by the utility of the work completed by contractors or is it also field-based (where employees of Liberty or different contractors review the work done in the field by contractors)?
c) What percentage of contractor work related to vegetation management is audited and inspected by Liberty?

RESPONSE TO REQUEST NO. 4:

a) As described in Liberty's WMP, Liberty has drafted a Post Work Verification Procedure (VM-04), which is applicable to both vegetation inspections and vegetation management work that is conducted on local, federal, and state agency land. The implementation of this plan was anticipated to occur in the first quarter of 2021. Additional processes were needed prior to implementation, including a Quality Control Work Plan and the Quality Control Inspection Specification and Scope of Work (for bidding purposes). These documents are in the final stages of development. Full implementation of the Liberty QA/QC process is now anticipated to occur in the second quarter of 2021.

   Liberty's current QA/QC process involves a 100% review of paperwork submitted by contractors and a field review, comprised of an approximately 15% random sample, of work completed by vegetation management contractors. The review includes tree work and pole clearing to comply with regulations, to determine whether the work was completed as prescribed, whether clean-up was satisfactory, and whether tree work met ANSI Standards.

b) Liberty's QA/QC current process involves both a desktop review, completed by Liberty employees and a field review, completed by both utility employees and contractors. The current process is described in the response above.

c) As stated above, Liberty's current QA/QC process involves a 100% review of paperwork submitted by contractors and an approximately 15% random sample (field review) of work completed by vegetation management contractors.

REQUEST NO. 5:

a) What (if any) are Liberty's Quality Assurance/ Quality Control processes in place to verify the quality of work done by contractors working on asset inspections (past and current)?
b) Are Liberty's QA/QC processes for asset inspections based only on a review of records kept by the utility of the work completed by contractors or is it also field-based (where

employees of Liberty or different contractors review the work done in the field by contractors)?

c) What percentage of contractor work related to asset inspections is audited and inspected by Liberty?

RESPONSE TO REQUEST NO. 5:

a) Liberty does not have any formalized QA/QC processes for asset inspections performed by contractors. The year 2020 was the first year that Liberty utilized contractors for any asset inspections. These inspections are normally performed by Liberty inspectors, but the volume in 2020 necessitated hiring a contractor to perform an asset survey in addition to asset inspections.

b) In 2020, Liberty utilized a combination of reviewing records compiled by the contractor in addition to ad hoc field checks in which Liberty employees re-inspected assets for accuracy and consistency. This same process will apply when a contractor is utilized for asset inspections

c) Liberty does not currently have a formalized QA/QC program for asset inspections so no percentage can be given for this response.

REQUEST NO. 6:

a) What (if any) are Liberty's Quality Assurance/ Quality Control processes in place to verify the quality of work done by contractors on grid hardening mitigation measures (past and current)?

b) What percentage of contractor work related to grid hardening is audited and inspected by Liberty?

RESPONSE TO REQUEST NO. 6:

a) Liberty currently does not have any formalized QA/QC processes for grid hardening projects in place. However, Liberty does have a company inspector on site for each grid hardening job whose primary task is to enforce construction standards being met and that facilities are built to the drawing's specification.

b) There is no auditing process in place when a company inspector has been assigned to a grid hardening project. However, Liberty has stated in the 2021 WMP Update that it will create an RFP process this year to get a third-party contractor to perform QA/QC on jobs beginning in 2022, even those that had a company inspector assigned.

REQUEST NO. 7:

a) What (if any) are Liberty's Quality Assurance/ Quality Control processes in place to verify the quality of work done by Reax Engineering regarding risk analysis and modeling?

RESPONSE TO REQUEST NO. 7:

a) Liberty worked closely with Reax when developing the risk model and participated throughout the process to develop and approve the methodology and data used, when feasible. Any modeling that was performed (i.e., Monte Carlo Simulations) was done by Reax because Reax has the expertise to perform fire science modeling.

REQUEST NO. 8:

a) What processes or steps does Liberty currently use to identify underperforming contractors, if any?
b) What is Liberty's process to address underperformance (for example, inconsistent or poor quality of work) by contractors, if any?

RESPONSE TO REQUEST NO. 8:

a) Liberty identifies underperforming work through audits, inspections, field observations from employees, and sometimes through reports from customers.

b) Typically, contract specifications detail a scope of work and expectations to be met for a quality work product. When underperformance is identified, the issue is addressed with the contractor. For example, if a tree work contractor did not perform proper cleanup and Liberty identifies the issue, the contractor is notified and expected to resolve the issue (at the cost of the contractor).

REQUEST NO. 9:

a) Provide a list of all instances in which Liberty's audits of contractor work identified performance problems in 2020. For each instance provide the date, location, description of the issue and solution, and name of the contractor firm.
b) Provide a list of all instances in which Liberty's audits of vegetation management work identified missed trees1 or other vegetation work that did not pass quality control in 2020. For each instance provide the date, location, description of the issue and solution, and name of the contractor firm.

RESPONSE TO REQUEST NO. 9:

a) See response to Question 9b.

b) See attached Excel file, "Pole Clearing Audit Results_Non-Pass," for a list of vegetation work that did not pass quality control in 2020.

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

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