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June 1, 2022

DATA REQUEST RESPONSE

LIBERTY UTILITIES (CALPECO ELECTRIC) LLC 2022 WMP

Data Request No.: CalAdvocates-Liberty-2022WMP-05
Subject Matter: 2022 Wildfire Mitigation Plan
Originator: Aaron Louie
Due Date: June 1, 2022

REQUEST NO. 1:

For each WMP initiative listed below, please state how your risk analysis for each Liberty circuit or circuit-segment (such as modeled Wildfire Risk Scores) influences where you plan to perform work for that WMP initiative in 2022.

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

RESPONSE TO REQUEST NO. 1:

- a) Refer to Section 4.2, Section 4.3, Section 7.1 and Section 7.3.5 of Liberty's 2022 WMP Update.
- b) Refer to Section 4.2, Section 4.3, Section 7.1 and Section 7.3.3.3 of Liberty's 2022 WMP Update.
- c) N/A
- d) Refer to Section 4.2, Section 4.3, Section 7.1 and Section 7.3.3.6 of Liberty's 2022 WMP Update.
- e) Refer to Section 4.2 and Section 7.3.3.9 of Liberty's 2022 WMP Update.
- f) N/A

- g) N/A
- h) N/A
- i) N/A
- j) N/A
- k) N/A

REQUEST NO. 2:

For each WMP initiative listed below, please state how your risk analysis for each Liberty circuit or circuit-segment (such as modeled Wildfire Risk Scores) influences how work for that WMP initiative in 2022 will be sequenced.

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

RESPONSE TO REQUEST NO. 2:

- a) Refer to Section 4.2, Section 4.3, Section 7.1 and Section 7.3.5 of Liberty's 2022 WMP Update.
- b) With respect to the sequencing of covered conductor projects within a given year, scheduling is done based on the timeline of the expected readiness for construction. The readiness for construction is based on such aspects as design completion, obtaining permits and easements, completion of vegetation work, and obtaining materials. While Liberty attempts to schedule top priority projects first, timelines often require schedule adjustments to complete planned projects in a given year.
- c) N/A
- d) N/A
- e) N/A
- f) N/A
- g) N/A
- h) N/A
- i) N/A
- j) N/A
- k) N/A

REQUEST NO. 3:

Provide your workplan that describes where and when you will perform system hardening on distribution circuits in 2022. For projects that you expect to partially complete in 2022 (i.e. projects that started before 2022 and are expected to continue in 2022, or active projects that are expected to be completed after 2022), please include the project and report the work that you forecast will actually be performed in calendar year 2022. For each project, please include the following information, at a minimum:

- a) Circuit ID number (matching those provided in response to Questions 1 and 2 of Data Request CalAdvocates-Liberty-2022WMP-03) associated with the project
- b) Circuit name
- c) Relevant wildfire risk score(s)
- d) The start date of the project
- e) The expected completion date of the project
- f) Length of covered conductor to be installed in 2022 in miles
- g) Length of underground conductor to be installed in 2022 in miles
- h) Length of traditional (bare-wire) overhead system hardening to be performed in 2022 in miles
- i) Length in miles of any other type of system hardening project to be installed in 2022 (if this is greater than zero, please describe the type of system hardening project).

RESPONSE TO REQUEST NO. 3

Refer to Attachment: Data Request CalAdvocates-Liberty-2022WMP-05_Responses Q3 and Q4.

REQUEST NO. 4:

Provide your workplan that describes where and when you will perform system hardening on transmission circuits in 2022. Include the same information detailed in the preceding question.

RESPONSE TO REQUEST NO. 4

Refer to Attachment: Data Request CalAdvocates-Liberty-2022WMP-05_Responses Q3 and Q4.

REQUEST NO. 5:

For any program for which you forecast capital expenditures in 2022 to be at least two times actual expenditure in 2021, please provide:

- a) The name of the program as it is identified in your 2022 WMP Update
- b) The WMP Initiative number in Table 12 of your 2022 WMP Update
- c) The name of the program as it is identified in your 2021 WMP Update
- d) The WMP Initiative number in Table 12 of your 2021 WMP Update
- e) An explanation for the projected increase.

RESPONSE TO REQUEST NO. 5

Refer to Attachment: Data Request CalAdvocates-Liberty-2022WMP-05_Responses Q5 and Q6.

REQUEST NO. 6:

For any program for which you forecast operating expenditures in 2022 to be at least two times actual expenditure in 2021, please provide:

- a) The name of the program as it is identified in your 2022 WMP Update
- b) The WMP Initiative number in Table 12 of your 2022 WMP Update
- c) The name of the program as it is identified in your 2021 WMP Update
- d) The WMP Initiative number in Table 12 of your 2021 WMP Update
- e) An explanation for the projected increase

RESPONSE TO REQUEST NO. 6

Refer to Attachment: Data Request CalAdvocates-Liberty-2022WMP-05_Responses Q5 and Q6.

REQUEST NO. 7:

Regarding your PSPS circuit modeling capabilities:

- a) Please describe your present circuit modeling capabilities with regard to PSPS decision-making (“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 capabilities that you expect to implement in 2022.
- 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. 7

- a) Refer to Section 8 of Liberty’s 2022 WMP Update for Liberty’s current PSPS decision-making thresholds. Liberty’s PSPS-decision making thresholds do not factor in circuit segment hardening efforts or other asset configuration changes to lines at this time. Refer to Sections 8.1, 8.2 and Attachment I of Liberty’s 2022 WMP Update for Liberty’s PSPS weather-related thresholds.
- b) Liberty plans to update its circuit modeling capabilities to include the probability of a PSPS event at the circuit segment level. Currently, the wildfire circuit risk assessment is independent of PSPS risk.
- c) Refer to Response 7b. Additionally, Liberty plans to incorporate wildfire risk mapping of grid hardening efforts, undergrounding, sectionalizing equipment installs to better estimate PSPS impacts at the circuit segment level.

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

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Responses to Q5 and Q6

Request Number	a. The name of the program as it is identified in your 2022 WMP Update	b. The WMP Initiative number in Table 12 of your 2022 WMP Update	c. The name of the program as it is identified in your 2021 WMP Update	d. The WMP Initiative number in Table 12 of your 2021 WMP Update	e. An explanation for the projected increase
#5	Advanced weather monitoring and weather stations	7.3.2.1	Advanced weather monitoring and weather stations	7.3.2.1	Liberty experienced challenges obtaining the 10 weather stations in 2021 due to supply chain issues. Notwithstanding the supply chain issues, the impact of the Tamarack and Caldor fire responses would likely not have allowed time to install all targeted weather stations in 2021. Liberty plans to install the 10 weather stations in 2022.
	Continuous monitoring sensors	7.3.2.2	Continuous monitoring sensors	7.3.2.2	The Tamarack and Caldor fires and turnover on Liberty's substation engineering team impacted staff resources. Given this impact, Liberty prioritized other WMP initiatives, including fuse changeouts and automatic reclosers. Liberty plans to install 10 DFA units on 10 feeders in 2022.
	Circuit breaker maintenance and installation to de-energize lines upon detecting a fault	7.3.3.2	Circuit breaker maintenance and installation to de-energize lines upon detecting a fault	7.3.3.2	Forecasted costs for 2022 are based on circuit breaker replacements at Squaw Valley substation and costs for 2021 were for circuit breaker replacements at Tahoe City Substation.
	Expulsion fuse replacement	7.3.3.7	Expulsion fuse replacement	7.3.3.7	Liberty did not meet its 2021 target of 1,500 fuse replacements due to supply chain issues impacting material availability and prohibitive lead times for procuring adequate materials. The Tamarack and Caldor fire responses also impacted Liberty's resources for this initiative. Liberty's 2022 cost forecast is based on its 2022 target of 1,500 fuse replacements.
	Undergrounding of electric lines and/or equipment	7.3.3.16	Undergrounding of electric lines and/or equipment	7.3.3.16	Liberty forecasts increased 2022 costs due to the Tahoe Vista Rule 20 undergrounding project.
	Stationed and on-call ignition prevention and suppression resources and services	7.3.6.7	Stationed and on-call ignition prevention and suppression resources and services	7.3.6.7	Forecasted costs for 2022 are based on two new fleet vehicles and costs for 2021 reflect one purchased fleet vehicle.
	Collaborative research on utility ignition and/or wildfire	7.3.7.2	Collaborative research on utility ignition and/or wildfire	7.3.7.2	Forecasted costs for 2022 are to install and commission HIFD produced by the University of Nevada Reno. After delays in the timeline, HIFD is set to be deployed in 2022.
#6	Other discretionary inspection of distribution electric lines and equipment, beyond inspections mandated by rules and regulations	7.3.4.9	Other discretionary inspection of distribution electric lines and equipment, beyond inspections mandated by rules and regulations	7.3.4.9	Liberty forecasts increased 2022 costs due to increased Level 3 repairs resulting from the System Survivability Liberty completed in 2020.
	Quality assurance / quality control of inspections	7.3.4.14	Quality assurance / quality control of inspections	7.3.4.14	Liberty implemented its Asset Inspection QA/QC program in 2022.
	Additional efforts to manage community and environmental impacts	7.3.5.1	Additional efforts to manage community and environmental impacts	7.3.5.1	Liberty's target for 2022 is 9 circuit miles compared to Liberty's completed performance of 3.4 circuit miles in 2021. Refer to Section 7.3.5.1 of Liberty's 2022 WMP Update for more information
	Remote sensing inspections of vegetation around distribution electric lines and equipment	7.3.5.7	Remote sensing inspections of vegetation around distribution electric lines and equipment	7.3.5.7	Forecasted costs for 2022 includes work that was completed in late 2021 and invoiced in 2022. Additionally, there are no capitalized costs for this initiative in 2022.
	Quality assurance / quality control of vegetation management	7.3.5.13	Quality assurance / quality control of vegetation management	7.3.5.13	Forecasted costs for 2022 include additional QA/QC work in scope, including QA/QC of LiDAR inspections and additional analysis of VM data.
	Removal and remediation of trees with strike potential to electric lines and equipment	7.3.5.16	Removal and remediation of trees with strike potential to electric lines and equipment	7.3.5.16	Forecasted costs for 2022 are based on annualized costs from 2020-2021 escalated by 2%.
	Centralized repository for data	7.3.7.1	Centralized repository for data	7.3.7.1	Forecasted costs for 2022 are based on a proposal for data analytics services. Liberty plans to issue an RFP in 2022 for comparable proposals.
Adequate and trained workforce for service restoration	7.3.9.1	Adequate and trained workforce for service restoration	7.3.9.1	Forecasted costs for 2022 include increased labor costs related to WMP that were not captured in this initiative in 2021.	