



Liberty Utilities (CalPeco Electric) LLC
933 Eloise Avenue
South Lake Tahoe, CA 96150
Tel: 800-782-2506
Fax: 530-544-4811

June 1, 2022

DATA REQUEST RESPONSE

LIBERTY UTILITIES (CALPECO ELECTRIC) LLC 2022 WMP

Data Request No.: CalAdvocates-Liberty-2022WMP-08
Subject Matter: 2022 Wildfire Mitigation Plan
Originator: Aaron Louie
Due Date: May 31, 2022

REQUEST NO. 1:

On page 120 of Liberty's 2022 WMP, Liberty states:

The Tahoe Vista Rule 20 project replaces overhead distribution lines with underground electric facilities in the underground district Area 10 (Beach to National) and Area 11 (National to Estates) in Placer County. Total project spend for the Tahoe Vista conversion is \$11.3 million. The project location is a 1.25-mile length of State Route 28 impacting approximately 90 private property parcels on the north shore of Lake Tahoe. In addition to its Rule 20 underground projects, Liberty is installing 0.37 miles of underground as a part of Liberty's planned resiliency corridor on Brockway 4202 and the Cascade Covered Conductor project.

- a) Does the "total project spend" noted in the quote above represent actual spending to date or forecast total spending for the project?
- b) What is Liberty's actual spending to date on the Tahoe Vista Rule 20 project?
- c) What is Liberty's current forecast of the total cost to complete the Tahoe Vista Rule 20 project?
- d) How much of the total project spend of \$11.3 million is allocated to the 1.25-mile length at the State Route 28 project location?
- e) How much of the total project spend of \$11.3 million is allocated to the 0.37 miles of undergrounding as part of Liberty's resilience corridor?
- f) Please provide any workpapers that Liberty used to develop the cost estimates for this undergrounding project.

RESPONSE TO REQUEST NO. 1:

- a) The "total project spend" represents the original forecast budget.
- b) The total project spend through the end of April 2022 is \$238,758.

- c) The current forecast of the total cost to complete the project is \$14.250 million (including contingency).
- d) All of the \$11.3 million of projected spend is allocated to the Tahoe Vista Rule 20 Project.
- e) None of the \$11.3 million projected spend for the Tahoe Vista Rule 20 Project is allocated to the 0.37 miles of undergrounding.
- f) Refer to Attachment: Tahoe Vista Business Case.

REQUEST NO. 2:

Regarding the Tahoe Vista Rule 20 project:

- a) Are the costs of the Tahoe Vista Rule 20 project wholly or partly included in your WMP costs in Section 3 of your WMP (“Actual and Planned Spending for Mitigation Plan”)?
- b) Are the costs of the Tahoe Vista Rule 20 project wholly or partly included in your system hardening costs in your WMP non-spatial data Table 12?
- c) To what account(s) does Liberty record the costs of the Tahoe Vista Rule 20 project?

RESPONSE TO REQUEST NO. 2:

- a) The costs of the Tahoe Vista Rule 20 Project are intended to be wholly included in Section 3 of the WMP costs.
- b) The costs of the Tahoe Vista Rule 20 Project are intended to be wholly included in the system hardening costs.
- c) Liberty records the costs of the of the construction work in progress (CWIP) accounts contained in the job created for this project. The job number for this project is 8800-0213-0567.

REQUEST NO. 3:

Regarding the 0.37-mile undergrounding project for Liberty’s planned resilience corridor, which is part of the Tahoe Vista Rule 20 project:

- a) What the name of the circuit that will be treated in the 0.37-mile undergrounding project?
- b) What the identification number of the circuit that will be treated in the 0.37-mile undergrounding project?
- c) Did Liberty select this circuit-segment for undergrounding based on an analysis of wildfire risks?
- d) Is the circuit treated in this project among the riskiest 10 percent of Liberty’s circuits?
- e) Is the circuit treated in this project among the riskiest 20 percent of Liberty’s circuits?
- f) Please describe in detail the findings of Liberty’s risk analysis or risk modeling with respect to the circuit treated in this project.

RESPONSE TO REQUEST NO. 3

- a) The 0.37 miles of underground consist of 0.24 miles on the Brockway 4202 Resiliency Corridor Project, which is a portion of the 4202 circuit and 0.12 miles on the Cascade Covered Conductor Project, which is a portion of the 3400 circuit.
- b) As noted in response 3a, a portion of the 0.37 miles in on the 4202 circuit and a portion is on the 3400 circuit.
- c) While Liberty did select these two projects based on the need for system hardening and wildfire mitigation, the underground portions of the projects were based on other circumstances such as permitting requirements and local needs.
- d) The Cascade Project, being a portion of the 3400 circuit, is being done on one of the circuits considered to be among the riskiest 10% of circuits. The Brockway 4202 project is not being done on a circuit considered to be one of the riskiest 10% of circuits.
- e) The Cascade Project, being a portion of the 3400 circuit, is being done on one of the circuits considered to be among the riskiest 20% of circuits. The Brockway 4202 project is not being done on a circuit considered to be one of the riskiest 20% of circuits.
- f) The Meyers 3400 and Meyers 3300 circuits are rated as Very High in Liberty's Circuit Risk Assessment discussed in its 2022 WMP Update. Refer to Attachment J, Table J.1-1: Liberty Circuit Risk Assessment in Liberty's 2022 WMP Update.

REQUEST NO. 4:

On page 120 of Liberty's WMP states that "When it is decided that a portion of the overhead distribution system should be upgraded, Liberty first considers available alternatives."

Regarding the Tahoe Vista Rule 20 project:

- a) For the 1.25-mile Rule 20 undergrounding project on State Route 28, what specific alternatives did Liberty consider?
- b) For the 1.25-mile Rule 20 undergrounding project on State Route 28, why did Liberty select undergrounding?
- c) For the 0.37-mile undergrounding project that is part of Liberty's planned resilience corridor, what specific alternatives did Liberty consider?
- d) For the 0.37-mile undergrounding project that is part of Liberty's planned resilience corridor, why did Liberty select undergrounding?

RESPONSE TO REQUEST NO. 4

- a) The Tahoe Vista Rule 20 Project is an undergrounding project initiated by Placer County under Rule 20A. The project addresses Rule 20 guidelines.
- b) See Response 4b.
- c) Liberty considered overhead covered conductor and the much more costly undergrounding. It was decided on both projects that small portions of the project required undergrounding. On Brockway 4202, the underground portion of the project was prudent on a portion of the project for both beatification and reliability. The area undergrounded needed the overhead structures minimized to address car versus pole issues, general congestion in the area and

beautification. It also connected to existing underground. On the Cascade Project a portion of the project was undergrounded in connection with the permitting process and crossing a scenic highway.

- d) Liberty selected undergrounding on a portion of the Brockway 4202 project for the reasons noted in the response to question 4c.

REQUEST NO. 5:

Regarding the Tahoe Vista Rule 20 project:

- a) For the 1.25-mile Rule 20 undergrounding project on State Route 28, will Liberty jointly trench with any other utilities?
- b) If the answer to part (a) above is yes, please identify the other utilities participating in the project.
- c) For the 0.37-mile undergrounding project that is part of Liberty's planned resilience corridor, will Liberty jointly trench with any other utilities?
- d) If the answer to part (c) above is yes, please identify the other utilities participating in the project.
- e) Does Liberty plan on undergrounding the electric service connections to the 90 private parcels that will be part of the project mentioned in part (a) above?
- f) Does Liberty plan on undergrounding other services such as communications to the 90 private parcels that will be part of the project mentioned in part (a) above?

RESPONSE TO REQUEST NO. 5

- a) Yes.
- b) Liberty is undertaking joint trench work with AT&T and Charter.
- c) No.
- d) N/A.
- e) Yes.
- f) Yes, Liberty is working with AT&T and Charter on undergrounding the services on the Tahoe Vista Rule 20 Project.

REQUEST NO. 6:

For the Tahoe Vista Rule 20 project, please state the month and year that Liberty *initiated*:

- a) Project planning
- b) Design and engineering
- c) Outreach to affected stakeholders (e.g., local and federal agencies of jurisdiction)
- d) Permitting
- e) Construction

RESPONSE TO REQUEST NO. 6

- a) The original project effort started in 2013 (Area 10) and 2017 (Area 11). Project planning for the current Tahoe Vista Rule 20 project started in November 2020.
- b) The original project effort started in 2013 (Area 10) and 2017 (Area 11). Design and engineering for the current Tahoe Vista Rule 20 project started in March 2021.
- c) The original project effort started in 2013 (Area 10) and 2017 (Area 11). Outreach for the current Tahoe Vista Rule 20 project started in November 2020.
- d) The original project effort started in 2013 (Area 10) and 2017 (Area 11). Permitting for the current Tahoe Vista Rule 20 project started in June 2021.
- e) Construction for the current Tahoe Vista Rule 20 project started in August 2021.

REQUEST NO. 7:

For the Tahoe Vista Rule 20 project, please state the month and year that Liberty *completed or currently plans to complete*:

- a) Project planning
- b) Design and engineering
- c) Permitting
- d) Construction

RESPONSE TO REQUEST NO. 7

- a) June 2022.
- b) June 2022.
- c) August 2022.
- d) October 2023.

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

Jordan Parrillo
Manager of Regulatory Affairs
Liberty Utilities (CalPeco Electric) LLC
701 National Ave,
Tahoe Vista, CA 96148
Telephone: 530-721-7818
jordan.parrillo@libertyutilities.com