



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

March 8, 2023

DATA REQUEST RESPONSE

LIBERTY UTILITIES (CALPECO ELECTRIC) LLC

Data Request No.: Cal Advocates-Liberty-2023WMP-01
Subject Matter: 2023 Wildfire Mitigation Plans
Originator: Aaron Louie
Due Date: Ongoing, as specified in each question

REQUEST NO. 1:

Please provide a copy of each WMP-related document, submission, or report you submit to the Office of Energy Infrastructure Safety (Energy Safety) in 2023 that is related to your WMP. Provide the copy to Cal Advocates within one business day of the document's submittal to Energy Safety. (If you have submitted the document to Energy Safety in 2023 prior to this data request, please provide a copy as soon as possible and no later than 10 business days from the issuance of this data request.)

This request is limited to materials or documents that (1) are related to work plans, initiative targets, risk models, risk spend efficiency (RSE) calculations, or WMP change orders; and (2) are provided to Energy Safety to provide additional details or context concerning information or statements in your WMP (and any subsequent revisions or change orders affecting your WMP).

RESPONSE TO REQUEST NO. 1:

Refer to attachment: "2023-03-06_Liberty_2023_WMP-RO" for Liberty's 2023 WMP pre-submission, as submitted to OEIS on March 6, 2023. Additionally, Liberty attempted to provide CalAdvocates with copies of its Q4 2022 Quarterly Data Report ("QDR") files on February 1, 2023. However, due to technical issues with the CPUC Kiteworks platform, Liberty was not able to provide copies of these files until February 9, 2023.

REQUEST NO. 2:

Please provide a copy of your WMP pre-submission within two business days of its submission to Energy Safety.

RESPONSE TO REQUEST NO. 2:

Refer to attachment: "2023-03-06_Liberty_2023_WMP_RO_Public" for Liberty's 2023 WMP pre-submission.

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REQUEST NO. 3:

Provide a copy of all documents or files that are referenced in your WMP Quarterly Data Reports and submitted to Energy Safety (including but not limited to all PDFs, spatial data files, non-spatial data files, and confidential attachments) on the same business day that the document is sent to Energy Safety.

RESPONSE TO REQUEST NO. 3:

Liberty attempted to provide CalAdvocates with copies of its Q4 2022 QDR files on February 1, 2023. However, due to technical issues with the CPUC Kiteworks platform, Liberty was not able to provide copies of these files until February 9, 2023.

REQUEST NO. 4:

Provide a copy of all your confidential responses to WMP discovery requests, on the same business day that you send the documents to the issuer of the discovery request. This includes:

- a) Confidential responses to WMP discovery requests issued by Energy Safety.
- b) Confidential responses to WMP discovery requests issued by other entities.

RESPONSE TO REQUEST NO. 4:

Liberty will provide CalAdvocates with copies of responses to 2023 WMP discovery requests made by Energy Safety and other entities.

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