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April 10, 2023

## **DATA REQUEST RESPONSE**

### **LIBERTY UTILITIES (CALPECO ELECTRIC) LLC**

Data Request No.: Cal Advocates-Liberty-2023WMP-05  
Subject Matter: 2023 Wildfire Mitigation Plans  
Originator: Aaron Louie  
Due Date: March 30, 2023

#### **Risk Modeling**

##### **REQUEST NO. 1:**

- a) As of January 1, 2022, have you identified transportation corridors within your service territory where falling or failing lines or poles could currently limit egress and/or ingress during an emergency?
- b) If the answer to part (a) is yes, please describe how you identify such transportation corridors.
- c) If available, please provide a geospatial data file that contains all current identified transportation corridors with ingress and egress hazards.

##### **RESPONSE TO REQUEST NO. 1:**

- a) No.
- b) N/A
- c) N/A

##### **REQUEST NO. 2:**

Provide an Excel table of all distribution circuit-segments that traverse HFTD areas (i.e., the segment has greater than zero circuit-miles in HFTD) existing as of January 1, 2023. The Excel table should list each such circuit-segment as a row and include the following information in separate columns.

**For items (n) and (r), please include all relevant risk scores.** For example, include vegetation risk score, conductor risk score, and any other driver-specific risk scores you have developed. Please insert additional columns as needed to accommodate this.

- a) Name or ID number of each circuit segment
- b) Circuit name for the circuit that each segment is part of
- c) Circuit ID for the circuit that each segment is part of
- d) Nominal voltage
- e) Total circuit-miles on the circuit-segment
- f) Overhead circuit-miles on the circuit-segment in non-HFTD Areas
- g) Overhead circuit-miles on the circuit-segment in HFTD Tier 2
- h) Overhead circuit-miles on the circuit-segment in HFTD Tier 3
- i) Underground circuit-miles on the circuit-segment in non-HFTD Areas
- j) Underground circuit-miles on the circuit-segment in HFTD Tier 2
- k) Underground circuit-miles on the circuit-segment in HFTD Tier 3
- l) Probability of ignition score for the circuit-segment, according to the risk model you used for your 2022 WMP filing
- m) Consequence of ignition score for the circuit-segment, according to the risk model you used for your 2022 WMP filing
- n) Total wildfire risk score(s) for the circuit-segment, according to the risk model you used for your 2022 WMP filing. Insert additional columns if needed
- o) Power Safety Power Shutoff (PSPS) risk score for the circuit-segment, according to the risk model you used for your 2022 WMP filing
- p) Probability of ignition score for the circuit-segment, according to the risk model you are using for your 2023-2025 WMP filing
- q) Consequence of ignition score for the circuit-segment, according to the risk model you are using for your 2023-2025 WMP filing
- r) Total wildfire risk score(s) for the circuit-segment, according to the risk model you are using for your 2023-2025 WMP filing. Insert additional columns if needed

s) Power Safety Power Shutoff (PSPS) risk score for the circuit-segment, according to the risk model you are using for your 2023-2025 WMP filing.

**RESPONSE TO REQUEST NO. 2:**

Refer to supporting file: “CalAdvocates-Liberty-2023WMP-05\_Liberty Response Question 2.”

**REQUEST NO. 3:**

Provide a geodatabase file containing the outputs from your *current* wildfire risk model (i.e., the model you are using for your 2023-2025 WMP filing), at the circuit-segment level. (This data should be equivalent to the previous question, but in GIS format.)

Please provide, as line features, the most recent spatial data for all circuit segments for which your current risk model calculates circuit segment-level expected risk (i.e., probability of ignition multiplied by the consequence of ignition).

Include the following attributes for each circuit segment:

- a) Items (a) through (c) of the previous question
- b) Items (p) through (s) of the previous question.

**RESPONSE TO REQUEST NO. 3:**

Liberty does not have a geodatabase file containing the outputs from its wildfire risk model used for the 2023-2025 WMP pre-submission at the circuit-segment level.

**Asset Inspections and Maintenance**

**REQUEST NO. 4:**

Please fill out the attached spreadsheet, *CalAdvocates-Liberty-2023WMP-05\_Attachment Tab 1*, requesting information regarding your asset inspections in 2022.

**RESPONSE TO REQUEST NO. 4:**

Refer to supporting file: “CalAdvocates-Liberty-2023WMP-05\_Liberty Response Question 4.”

**REQUEST NO. 5:**

In response to Data Request CalAdvocates-Liberty-2022WMP-06, Question 7, March 24, 2022, Liberty stated, “Liberty’s QA/QC processes for asset inspections were developed for implementation in 2022. The QA/QC processes will be conducted in Quarter 3 and Quarter 4 of 2022 after Quarter 1 and Quarter 2 detailed inspections are completed.”

- a) Did Liberty implement its QA/QC processes for asset inspections in the second half of 2022 as referenced in the quote above?
- b) Please summarize the results of Liberty’s asset inspection QA/QC reviews in 2022.
- c) Did Liberty’s asset inspection QA/QC reviews in 2022 lead to any corrective actions or improvements, such as performing re-inspections of certain assets, revising inspection protocols, or changing training for inspectors?
- d) If the answer to part (c) is yes, please describe the actions that Liberty is taking as a result of its asset inspection QA/QC reviews.
- e) If the answer to part (c) is no, please explain why not.

**RESPONSE TO REQUEST NO. 5:**

- a) Yes.
- b) As part of its QA/QC process for 2022, Liberty assigned a third-party contractor to re-inspect 0.5% of its 2022 detailed inspections, equating to 27 re-inspections. Of these, 24 were completed and three locations were inaccessible at the time of re-inspection due to snow, equating to 0.44% re-inspected. Refer to supporting file: “CalAdvocates-Liberty-2023WMP-05\_Liberty Response Question 5 and 6.”
- c) No. The QA/QC reviews showed that there are some inconsistencies among inspectors, but the significant issues were captured by both inspections.
- d) None.
- e) Minor inconsistencies among inspections are to be expected. Since major issues were captured with both inspections, no action is being taken at this time

**REQUEST NO. 6:**

In response to Data Request CalAdvocates-Liberty-2022WMP-06, Question 7, March 24, 2022, Liberty stated “Liberty’s QA/QC processes for asset inspections were developed for implementation in 2022. The QA/QC processes will be conducted in Quarter 3 and Quarter 4 of 2022 after Quarter 1 and Quarter 2 detailed inspections are completed.”

The following questions refer to the QA/QC processes for asset inspections that Liberty implemented in Quarter 3 and Quarter 4 of 2022:

- a) Please provide a sample of 5 completed “Appendix A – Program Manager Quarterly Review Acknowledgment” forms.
- b) Please provide a sample of 5 completed “Appendix B – Senior Manager Annual Review Acknowledgment” forms.
- c) Please provide a sample of 5 completed “Appendix C – Third Party Inspection” forms that were completed by third party contractors.

**RESPONSE TO REQUEST NO. 6:**

- a) Liberty completed one Program Manager Review Acknowledgement form for 2022 asset inspection QA/QC activities. Refer to supporting file: “CalAdvocates-Liberty-2023WMP-05\_Liberty Response Question 6a.”
- b) Liberty completed one Senior Manager Annual Review Acknowledgement form for 2022 asset inspection QA/QC activities. Refer to supporting file: “CalAdvocates-Liberty-2023WMP-05\_Liberty Response Question 6b.”
- c) Refer to supporting file: “CalAdvocates-Liberty-2023WMP-05\_Liberty Response Question 5 and 6.” This file captures the information from the third party QA/QC inspections completed in 2022.

**REQUEST NO. 7:**

Please augment Table 13 of the non-spatial data tables in your WMP Quarterly Data Report for Q4 of 2022, which reports asset-related corrective notifications on electric circuits that were open at the end of the quarter. Add the following information in separate columns:

- a) Name of the associated circuit
- b) ID number of the associated circuit
- c) Geographic latitude in decimal degrees, truncated to seven decimal places
- d) Geographic longitude in decimal degrees, truncated to seven decimal places
- e) Object/damage code or other description of defect

**RESPONSE TO REQUEST NO. 7:**

Refer to supporting file: “CalAdvocates-Liberty-2023WMP-05\_Liberty Response Question 7.”

**REQUEST NO. 8:**

Regarding Table 13 of the non-spatial data tables in your WMP Quarterly Data Report for Q4 of 2022:

- a) Do you have an internal system of identifying priority levels for corrective notifications that differs from the priority levels specified in General Order 95, Rule 18?
- b) If the answer to part (a) is yes, please explain your internal priority system.
- c) Do you ever re-inspect corrective notifications before they are resolved?
- d) If the answer to the part (b) is yes, under what circumstances do you conduct re-inspections?

**RESPONSE TO REQUEST NO. 8:**

- a) Yes.
- b) Along with GO 95, Rule 18, Liberty uses its fire risk maps and asset condition codes to assess the prioritization of corrective actions and replacements.
- c) Yes.
- d) Liberty has conducted re-inspections through its detailed asset inspection program of assets that were inspected as part of its full system survey conducted in 2020. Additionally, the Job Facilitator's role may include verification of issues identified during an inspection.

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

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