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April 26, 2022

DATA REQUEST RESPONSE

LIBERTY UTILITIES (CALPECO ELECTRIC) LLC

Data Request No.: Cal Advocates-Liberty-2023WMP-06
Subject Matter: 2023 Wildfire Mitigation Plans
Originator: Aaron Louie
Due Date: April 19, 2023

Vegetation Management (VM)

REQUEST NO. 1:

Please provide a list of any incidents in 2022 where the actions of a VM contractor posed a safety risk to workers and/or the public. "Safety risk" here is defined as any occurrence on a worksite where the contractor's behavior created a safety hazard for either workers or the general public. For each instance, please provide:

- a) The date you were informed of the safety issue
- b) The date that the original work that created the safety issue was performed
- c) Whether the safety issue concerned a transmission or distribution circuit
- d) The vegetation management initiative involved in the original work
- e) A brief description of the safety issue involved.

RESPONSE TO REQUEST NO. 1:

Liberty did not experience any incidents in 2022 where the actions of a VM contractor posed a safety risk to workers or the public.

System Hardening

REQUEST NO. 2:

Provide your workplan that describes where and when you will perform system hardening on distribution circuits in 2023. For projects that you expect to partially complete in 2023 (i.e., projects that started before 2023 and are expected to continue in 2023, or projects that are expected to be completed after 2023), please include the project and report the work what you forecast will actually be performed in calendar year 2023.

For each project, include the following information in separate columns, at a minimum:

- a) Order number
- b) Program
- c) Circuit ID number
- d) Circuit-segment name or ID number (if the project affects more than one circuit-segment, please identify each one)
- e) Relevant wildfire risk score(s) from the wildfire risk model that you are using to estimate distribution risk in your 2023-2025 WMP filing
- f) The expected or actual start date of the project
- g) The expected completion date of the project
- h) Length (in circuit miles) of covered conductor to be installed in 2023
- i) Length (in circuit miles) of underground conductor to be installed in 2023
- j) Length (in circuit miles) of overhead conductor to be permanently removed in 2023 and replaced by underground conductor (note that this may differ slightly from the previous part due to differing overhead and underground routes)
- k) Length (in circuit miles) of overhead conductor to be permanently removed in 2023 and not replaced with covered conductor or undergrounded.
- l) Length (in circuit miles) of any other type of system hardening project to be installed in 2023 (if this is greater than zero, please describe the type of system hardening project)

RESPONSE TO REQUEST NO. 2:

Refer to tab “2023” in supporting file: “CalAdvocates-Liberty-2023WMP-06_Liberty Response Questions 2 and 3.”

REQUEST NO. 3:

Provide your workplan that describes where and when you will perform system hardening on distribution circuits in 2024. For projects that you expect to partially complete in 2024 (i.e., projects that are expected to start before 2024 and are expected to continue in 2024, or projects that are expected to be completed after 2024), please include the project and report the work that you forecast will actually be performed in calendar year 2024.

For each project, include the following information in separate columns, at a minimum:

- a) Order number
- b) Program
- c) Circuit ID number
- d) Circuit-segment name or ID number (if the project affects more than one circuit-segment, please identify each one)
- e) Relevant wildfire risk score(s) from the wildfire risk model that you are using to estimate distribution risk in your 2023-2025 WMP filing
- f) The expected or actual start date of the project
- g) The expected completion date of the project
- h) Length (in circuit miles) of covered conductor to be installed in 2024
- i) Length (in circuit miles) of underground conductor to be installed in 2024

- j) Length (in circuit miles) of overhead conductor to be permanently removed in 2024 and replaced by underground conductor (note that this may differ slightly from the previous part due to differing overhead and underground routes)
- k) Length (in circuit miles) of overhead conductor to be permanently removed in 2024 and not replaced with covered conductor or undergrounded
- l) Length (in circuit miles) of any other type of system hardening project to be installed in 2024 (if this is greater than zero, please describe the type of system hardening project).

RESPONSE TO REQUEST NO. 3:

Refer to tab “2024” in supporting file: “CalAdvocates-Liberty-2023WMP-06_Liberty Response Questions 2 and 3.”

REQUEST NO. 4:

For each of your 2023-2025 WMP system hardening initiatives, please provide disaggregated information related to expenditures and circuit miles treated in the attached table, *Cal Advocates-Liberty-2023WMP-06_Attachment Tab 1*. Add extra columns as needed.

Note: for the purposes of this question, “line removal” refers to conductors that are permanently removed without replacement – for instance, as part of a remote grid project. This should be understood as identical to part (k) of questions 2 and 3 above.

RESPONSE TO REQUEST NO. 4:

Refer to supporting file: “CalAdvocates-Liberty-2023WMP-06_Liberty Response Question 4”

PSPS

REQUEST NO. 5:

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 2023.
- c) Please describe any improvements to the present PSPS circuit modeling capabilities that you expect to implement in 2024.
- d) Please describe the expected state of your PSPS circuit modeling capabilities at the conclusion of the 2023-2025 WMP cycle.

RESPONSE TO REQUEST NO. 5:

- a) Liberty's 2023 WMP section 6.2 includes the baseline PSPS risk analyses and assessment performed at the beginning of this year by circuit. The PSPS risk decision-making framework has not been developed and the model inputs currently do not incorporate grid hardening efforts and is a static study. The decision-making framework would have to consider current PSPS thresholds affecting each circuit and any current PSPS mitigation controls in place would also need to be factored in and calculated separately to support any proposed changes to PSPS thresholds. This would result in a more refined baseline PSPS baseline risk assessment. Liberty does not have plans to track the performance of PSPS mitigations nor improve its current PSPS circuit model capabilities. Measuring PSPS risk reduction would require tracking circuit segments with PSPS mitigations planned such as covered conductor, installed Sensitive Relays, grid controls to divert electricity flow to other lines, and Microgrids at the specific GIS location in order to monitor and assess current PSPS thresholds and forced outage events during fire season. Current data limitations and root causes of outage events are not monitored at the specific asset level.
- b) See response to Question 5, part (a).
- c) See response to Question 5, part (a).
- d) Liberty's 2023 WMP pre-submission Section 6.7 and Table 6-9 includes Liberty risk assessment improvement plan for 2023-2025, including Liberty's data integration of asset and vegetation performance tracking with real-time data analytics to effectively measure risk reduction as it relates to wildfire risk. Liberty could also integrate PSPS mitigation measures as part of its enterprise risk management solution.

Ignitions

REQUEST NO. 6:

Identify any ignitions in 2022 associated with assets where you had an existing corrective notification at the time of the ignition. Please provide a spreadsheet listing each such ignition (as rows) with the following information in separate columns:

- a) Unique ignition ID
- b) Date of ignition
- c) Cause of ignition
- d) Type of asset associated with the ignition
- e) Acres burned
- f) Number of structures burned if any
- g) Number of injuries associated with ignition if any
- h) Asset ID of asset associated with ignition
- i) Circuit ID number of circuit associated with ignition
- j) Notification number(s) for the existing corrective notification on the asset in question
- k) Priority level of the existing corrective notification on the asset in question

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RESPONSE TO REQUEST NO. 6:

Liberty did not have any ignitions in 2022 associated with assets where it had an existing corrective notification at the time of the ignition

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

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