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May 23, 2022

## **DATA REQUEST RESPONSE**

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

Data Request No.: Cal Advocates-Liberty-2023WMP-07  
Subject Matter: 2023 Wildfire Mitigation Plans  
Originator: Talal Harahsheh  
Due Date: May 23, 2023

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

Page 55 of Liberty's WMP states, "Liberty has not conducted a wildfire risk assessment using the 85th percentile consequence calculation."

- a) Why hasn't Liberty conducted a wildfire risk assessment using the 85th percentile consequence calculation?
- b) What other wildfire risk assessments has Liberty conducted instead?

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

- a) In its 2023 WMP, Liberty provides a map in Figure 5-11 showing its service territory overlaid with the Social Vulnerability Index (SVI) and its current Reax wildfire risk polygons. Liberty provides an additional map in Appendix C of its 2023 WMP showing the SVI distribution, Liberty's updated utility risk analysis in its 2023 WMP, and major roads. Due to increased risk modeling requirements in the Office of Energy Infrastructure Safety (OEIS) 2023-2025 WMP Technical Guidelines, Liberty did not have enough time to analyze the intersection of the SVI and the 85th percentile of wildfire consequence risk according to Liberty's updated wildfire risk modeling results.
- b) Refer to Section 6 of Liberty's 2023 WMP.

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

Page 57 of Liberty's WMP states:

Survey reports produced by CAL FIRE identified 10 sub-divisions in South Lake Tahoe with no secondary egress, and one with limited egress. These sub-divisions consist mostly of single-family homes on flat land, surrounded by grass, trees, brush, and timber. In Placer County, CAL FIRE identified 21 subdivisions with no secondary egress, and three with limited egress. These areas include a mix of single-family homes, townhomes, and duplexes

surrounded by similar vegetation, but the topography varies from flat land to slopes, ridges, and canyons. All 35 subdivisions were categorized by CAL FIRE as “Very High” Fire Hazard Severity Zones.

- a) Do Liberty’s PSPS and wildfire risk analyses consider whether a location has no secondary egress or limited egress?
- b) If the answer to part (a) is yes, please explain how your risk analyses address limited egress.
- c) What actions did Liberty take during the 2020-2022 WMP cycle to reduce wildfire risk for the subdivisions mentioned in the quote above?
- d) What actions does Liberty plan to take during the 2023-2025 WMP cycle to reduce wildfire risk for the subdivisions mentioned in the quote above?

**RESPONSE TO REQUEST NO. 2:**

- a) No.
- b) N/A
- c) Liberty completed mitigation actions during the 2020-2022 WMP cycle in limited egress areas throughout its service territory. Mitigation actions were driven by existing decision-making processes and risk analysis that did not consider egress. For an example of mitigation actions completed during the 2020-2022 WMP cycle in limited egress areas, refer to supporting materials: “CalAdvocates-Liberty-2023WMP-07\_Liberty Response Question 3c.”
- d) During the 2023-2025 WMP cycle, Liberty will continue to perform mitigation work across its service territory. Mitigation actions will be driven by the decision-making processes and risk analyses detailed in Liberty’s 2023 WMP and in subsequent WMP submissions. Liberty may consider incorporating limited egress into wildfire risk analysis in future years so that the risk can be quantified.

**REQUEST NO. 3:**

Page 60 of Liberty’s WMP states, “Absentee landlords make notification requirements and coordination for O&M activities difficult, sometimes resulting in delayed activities or their cancellation entirely.”

- a) Please describe what methods or strategies Liberty has adopted to ameliorate the problem noted above.
- b) Please describe Liberty’s method of maintaining accurate and up-to-date contact information for homeowners and renters in its service territory.
- c) Please describe Liberty’s public communication strategy to inform homeowners and renters in its service territory when O&M activities are to be expected.

**RESPONSE TO REQUEST NO. 3:**

- a) Liberty uses a variety of methods for notifying customers of O&M activities:
  - Door hangers
  - Sign boards
  - Mailed letters or postcards
  - Social media posts
  - Email
  - Bill inserts
  - Everbridge text notification
  - Door to door in person notification attempts
  - Phone call notification attempts
- b) Customer Service Representatives (CSRs) are required to verify customer information including telephone number, email, and mailing address. This expectation is reviewed through the Call Quality Program in which “Verifies customer information according to Liberty standards” is one component of the scorecard.
- c) Refer to Response 3a.

**REQUEST NO. 4:**

Page 60 of Liberty’s WMP states, “Liberty is currently working with the [Tahoe Regional Planning Agency] to update an existing memorandum of understanding (“MOU”) for O&M activities to allow minor repairs, replacements, and vegetation maintenance to be completed without agency review and approval.”

- a) To date, has Liberty executed an updated memorandum of understanding with Tahoe Regional Planning Agency?
- b) If the answer the part (a) above is “no,” please describe the status of developing an updated memorandum of understanding and the projected timeline to execute it.

**RESPONSE TO REQUEST NO. 4:**

- a) No.
- b) Liberty is in the process of executing an MOU with TRPA. The draft MOU is currently being reviewed by TRPA legal counsel and will then be sent back to Liberty for additional review.

**REQUEST NO. 5:**

Page 64 of Liberty’s WMP states:

Although the current approach provides significant advancements over earlier efforts, it was neither reasonable nor feasible to conduct all the calculations and analyses provided in the 2023-2025 Wildfire Mitigation Plan Technical Guidelines (“Technical Guidelines”) prior to Liberty’s 2023 WMP submission. Liberty, however, is committed to continuing to evolve

and improve its risk modeling practices and intends to conduct the analyses and calculations described in the Technical Guidelines, to the extent possible, as part of future work.

- a) Please identify each calculation or analysis provided in the 2023-2025 WMP Technical Guidelines that Liberty has not yet conducted.
- b) For each item listed in response to part (a), identify the resource constraint(s) that hindered completion prior to Liberty's 2023 WMP submission.
- c) For each item listed in response to part (a), state when Liberty anticipates completing it.

**RESPONSE TO REQUEST NO. 5:**

- a) Refer to Liberty's 2023 WMP for the analysis that Liberty completed in advance of its 2023 WMP submission. Refer to the OEIS 2023-2025 Wildfire Mitigation Plan Technical Guidelines for the calculations and analysis provided in the guidelines.
- b) OEIS released its final 2023-2025 WMP Technical Guidelines on December 6, 2022. In late January 2023, Liberty executed an agreement with Technosylva to provide wildfire risk analytics utilizing its Wildfire Risk Reduction Model ("WRRM"). Liberty received its first analytics package with the results from WRRM in late February 2023. Additionally, in late January 2023, Liberty signed a formal agreement with Direxyon to pilot its asset risk decision-making solution to be incorporated, in part, in Liberty's 2023 WMP. Liberty's 2023 WMP pre-submission was submitted to OEIS on March 6, 2023. Thus, time was a limiting factor in completing additional analysis contained in the OEIS 2023-2025 WMP Technical Guidelines.
- c) Liberty anticipates completing additional analysis contained in the OEIS 2023-2025 WMP Technical Guidelines during the 2023-2025 WMP cycle.

**REQUEST NO. 6:**

Page 70 of Liberty's WMP states that social vulnerability, physical vulnerability, and coping capabilities are not factors currently included in the wildfire risk analysis though Liberty intends to incorporate these factors in its future risk modeling process.

- a) When Liberty eventually incorporates the factor "physical vulnerability" within future wildfire risk analyses, what attributes/characteristics would Liberty utilize to define "physical vulnerability"?
- b) What data does Liberty currently maintain or collect to measure physical vulnerability?
- c) When Liberty eventually incorporates the factor "social vulnerability" within future wildfire risk analyses, what attributes/characteristics would Liberty utilize to define "social vulnerability"?
- d) What data does Liberty currently maintain or collect to measure social vulnerability?

**RESPONSE TO REQUEST NO. 6:**

- a) Liberty has not determined all attributes/characteristics it will utilize to define physical vulnerability. Liberty considers Medical Baseline (MBL) and some Access and

Functional Needs (AFN) customers as physically vulnerable. In future wildfire risk analysis, Liberty can assign weights to different customer categories (*i.e.*, AFN/MBL, Commercial, Residential, Critical Facilities) based on physical vulnerability.

- b) Liberty maintains a list of MBL customers and self-identified AFN customers.
- c) Liberty has not determined all attributes/characteristics it will utilize to define social vulnerability. Liberty considers some AFN customers as socially vulnerable (*i.e.*, CARE customers). Additionally, in its 2023 WMP, Liberty provides a map in Figure 5-11 showing its service territory overlaid with the Social Vulnerability Index (SVI) and its current Reax wildfire risk polygons. Liberty provides an additional map in Appendix C of its 2023 WMP showing the SVI distribution, Liberty's updated utility risk analysis in its 2023 WMP, and major roads.
- d) Liberty maintains a list of self-identified AFN customers. Liberty also analyzed the Centers for Disease Control and Prevention/Agency for Toxic Substances and Disease Registry's Social Vulnerability Index dataset.

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

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