



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

June 2, 2023

## **DATA REQUEST RESPONSE**

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

Data Request No.: Cal Advocates-Liberty-2023WMP-010  
Subject Matter: 2023 Wildfire Mitigation Plans  
Originator: Talal Harahsheh  
Due Date: June 1, 2023

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

On page 173 of its WMP, Liberty states that its 2022 target for Patrol Inspections of Distribution Electric Lines and Equipment was erroneously established at 706.3 miles, causing Liberty to miss its 2022 inspection target by 203 miles. Please respond to the following:

- a) Explain how Liberty mistakenly set a target of 706.3 miles.
- b) State the basis for why Liberty believes the target should have been closer to 503 miles (the amount Liberty was able to complete in 2022).
- c) Explain Liberty's process, procedure, or protocol for determining annual asset inspection targets for each type of inspection Liberty conducts.

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

- a) Liberty erroneously reported its target as the total overhead miles for its service territory. Liberty does not perform patrol inspections in areas where detailed inspections are being conducted and thus the target should have been a function of total overhead miles minus overhead detailed inspection miles.
- b) Liberty's 2022 target of 503 miles for Patrol Inspections of Distribution Electric Lines and Equipment is a function of total overhead miles (706.3 miles) minus detailed inspections completed in 2022 on overhead miles (203.4 miles).
- c) Refer to Table 8-8 in Liberty's 2023 WMP for Liberty's asset inspection frequency, method and criteria.

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

On page 174 of its WMP, Liberty states that it completed Quality Assurance and Quality Control (QA/QC) on 0.0044% of its detailed asset inspections in 2022, while Liberty's target was to QA/QC 0.0050% of the detailed asset inspections in 2022. Please respond to the following:

- a) How many individual asset inspections did Liberty conduct QA/QC on in 2022?
- b) Are both transmission and distribution detailed inspections included in the 0.0044% figure?
- c) If the answer is to part (b) above is “no,” please answer which type of detailed inspections is included in the 0.0044% figure.
- d) If the answer is to part (b) above is “yes,” please breakdown of each type of detailed inspections is included in the 0.0044% figure.
- e) Please provide an Excel table of the QA/QC checks that Liberty completed on detailed asset inspections in 2022. Please list in the Excel sheet the following information as columns: the date of the original detailed inspection, the date QA/QC was performed, what type of asset was inspected, the result of the QA/QC check, and any follow-up remediation or inspections that Liberty took as a result of the QA/QC check.
- f) State the basis for Liberty’s target of performing QA/QC on 0.0050% of detailed asset inspections in 2022.
- g) Explain why Liberty missed the 0.005% QA/QC target in 2022.

**RESPONSE TO REQUEST NO. 2:**

- a) 24
- b) Yes.
- c) N/A
- d) 15 transmission (60 kV) and 9 distribution.
- e) Refer to file: CalAdvocates-Liberty-2023WMP-10\_Liberty Response Question 2.
- f) Liberty targeted 0.5% of detailed inspections as its QA/QC target as a starting point for the program and plans to escalate this sampling size in 2023.
- g) Three of the 27 selected locations were inaccessible in December (when the QA/QC was completed) due to snow

**REQUEST NO. 3:**

On page 182 of its WMP, Liberty states that it implemented its asset inspection QA/QC in 2022 with a 0.5% sample of detailed inspections that were re-inspected by third-party inspectors. Minimal differences were noted by the third-party inspectors, who found only very minor infractions during the re-inspections if differences were noted at all.

- a) Please explain the apparent discrepancy between the targets stated on pages 174 and 182 for QA/QC of detailed asset inspections (0.005% on page 174 and 0.5% on page 182).
- b) If these two targets refer to different types of QA/QC activities, please provide a thorough description of each activity that identifies the similarities and differences.

**RESPONSE TO REQUEST NO. 3:**

- a) The discrepancy is a typo. Liberty’s QA/QC target for detailed asset inspections is 0.5%.
- b) N/A

**REQUEST NO. 4:**

On page 182 of its WMP, Liberty states that it implemented its asset inspection QA/QC in 2022 with a 0.5% sample of detailed inspections that were re-inspected by third-party inspectors. Minimal differences were noted by the third-party inspectors, who found only very minor infractions during the re-inspections if differences were noted at all.

Please respond to the following:

- a) How many third-party QA/QC checks were completed on detailed asset inspections in 2022?
- b) Of the checks included in the answer to part (a), how many checks noted “differences” between the initial inspections and the third-party QA/QC inspections?
- c) Please describe and provide examples of the “very minor infractions.”

**RESPONSE TO REQUEST NO. 4:**

- a) 24
- b) Six re-inspections noted minor differences.
- c) Examples include noting Level 3 differences such as foreign sign, loose secondary down guy, and auto splice 1” away from insulator.

**REQUEST NO. 5:**

On page 183 of its WMP, Liberty states:

As of May 1, 2023, Liberty has halted its detailed inspections in 2023 to eliminate its backlog of open work orders. Both contract crews and internal crews are working to expedite the process.

Liberty also states that it “will halt its detailed inspections in order to catch up with its open maintenance work orders and resume detailed inspections in 2024.”

Please respond to the following:

- a) On what exact date in 2023 did Liberty halt its detailed inspections, as referenced in the above quote?
- b) What is Liberty’s 2023 target for detailed asset inspections?
- c) How many detailed asset inspections has Liberty completed in 2023?
- d) Does Liberty intend to resume detailed asset inspections on a specific date in 2024 or will the resumption timing depend on how quickly Liberty is able to eliminate its backlog of open work orders? Please explain your response.

- e) Is Liberty currently in compliance with General Orders 95 and 165 regarding the frequency of detailed asset inspections?
- f) If Liberty conducts no detailed inspections for the remainder of 2023, will Liberty be in compliance with General Orders 95 and 165 on January 1, 2024?

**RESPONSE TO REQUEST NO. 5:**

- a) Liberty halted its detailed inspections on January 1st, 2023, with the exception of detailed underground inspections due in 2023.
- b) 40.3 circuit miles.
- c) Liberty has not completed detailed inspections yet in 2023.
- d) Liberty is currently planning to resume its detailed inspections on January 1st, 2024.
- e) Liberty will remain in compliance with GO95 and 165.
- f) Yes.

**REQUEST NO. 6:**

On page 183 of its WMP, Liberty states:

As of May 1, 2023, Liberty has halted its detailed inspections in 2023 to eliminate its backlog of open work orders. Both contract crews and internal crews are working to expedite the process.

Please respond to the following:

- a) Explain Liberty's rationale for halting detailed inspections in 2023 to reduce the number of open work orders on Liberty's system, as referenced in the quote above.
- b) Explain the prudence of halting detailed asset inspections until 2024.
- c) Estimate the potential safety risk caused by not conducting detailed inspections of Liberty infrastructure in 2023.

**RESPONSE TO REQUEST NO. 6:**

- a) Liberty is halting its detailed overhead inspections in 2023 in order to avoid further overlap of infractions found in its 2020 full system survey and prioritize repairs to infractions found during the system survey
- b) Liberty's full system survey completed in 2020 included all overhead lines that normally are inspected over a five-year period. Liberty will remain compliant during 2023 without completing any overhead detailed inspections.
- c) The safety risk of halting detailed overhead inspections in 2023 is minimal. In addition to previous inspections and repair work, Liberty will be monitoring its system as part of its 2023 Resilience Project which will impact 15 feeders, or one third of Liberty's circuits. Additionally, Liberty will continue to make repairs and replace poles across both Tier 2 and Tier 3 areas in its service territory in 2023.

**REQUEST NO. 7:**

- a) Describe Liberty's current staffing resources allocated to each of the following items under asset management, including but not limited to:
  - a. Inspections
  - b. Maintenance
  - c. Resolution of open work orders and any other items not listed above.
- b) Please explain how Liberty's current staffing is sufficient or not sufficient to comply with regulatory requirements for asset management and inspection?
- c) How many open (unfilled) staff or contractor positions does Liberty have in the area of asset management and inspections? Please explain your response.
- d) How many filled staff or contractor positions in the area of asset management and inspections would Liberty consider to be "fully staffed"?
- e) Does Liberty intend to increase staffing (either with directly employed personnel or contractors) to increase capacity to perform asset management and inspections?
- f) If the answer to part (e) is yes, will the increase be temporary or permanent?
- g) If the answer to part (e) is yes, will the increase be based on creating new positions or filling current vacancies?

**RESPONSE TO REQUEST NO. 7:**

- a) Liberty's current staffing resources include:
  - a. Inspections: Five internal inspectors and one contract inspector
  - b. Maintenance: Four internal crews and three contract crews available
  - c. Open work orders and other: Same as above plus five internal troublemen
- b) Liberty's current staffing has been sufficient to comply with regulatory requirements for asset management and inspection.
- c) Zero. Liberty is fully staffed with inspection resources and one contractor resource.
- d) Fiver internal staff and one contractor is currently considered fully staffed.
- e) No.
- f) N/A
- g) N/A

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](mailto:jordan.parrillo@libertyutilities.com)