



Liberty
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June 9, 2023

DATA REQUEST RESPONSE

LIBERTY UTILITIES (LIBERTY) 2023-2025 Wildfire Mitigation Plans

Data Request No.: CalAdvocates-Liberty-2023WMP-12

Requesting Party: Public Advocates Office

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Date Received: June 6, 2023

Due Date: June 9, 2023

REQUEST NO. 1:

On pp. 29-30 of its WMP, Liberty describes its actual WMP spends for the 2020-2022 cycle. Please provide a breakdown of the actual spends including at least the following categories:

- Risk assessment and modeling
- Grid design and system hardening
- Asset management and inspections
- Vegetation management and inspections
- Situational awareness and forecasting
- Other spending

Please provide the breakdown in tabular format for each year, showing all the costs amounting to:

- a) \$33,331,000 for 2020,
- b) \$33,567,000 for 2021, and
- c) \$50,132,000 for 2022

RESPONSE TO REQUEST NO. 1:

- a) Refer to Liberty's Revised Q4 2022 WMP Quarterly Data Report (QDR) submitted to OEIS on March 8, 2023.
- b) See response 1a.
- c) See response 1b.

REQUEST NO. 2:

On p. 30 of its WMP, Liberty describes its planned spends for the 2023-2025 WMP cycle. Please provide a breakdown of the described proposed expenditures including at least the following categories:

- Risk assessment and modeling
- Grid design and system hardening
- Asset management and inspections
- Vegetation management and inspections
- Situational awareness and forecasting
- Other spending

Please provide the breakdown in tabular format for each year, showing all the costs amounting to:

- a) \$48,391,000 for 2023,
- b) \$54,180,000 for 2024, and
- c) \$45,078,000 for 2025.

RESPONSE TO REQUEST NO. 2:

- a) Refer to Liberty's Revised Q4 2022 WMP Quarterly Data Report (QDR) submitted to OEIS on March 8, 2023.
- b) See response 2a.
- c) See response 2b.

REQUEST NO. 3:

On pp. 201-202 of its WMP, Liberty provides Table 8-18: “Liberty Vegetation Inspections Targets by Year.” Please explain why the row describing Liberty’s Vegetation Targets by Year for the Initiative Activity “Program – LiDAR” is blank.

RESPONSE TO REQUEST NO. 3:

The blank row in Table 8-18 is a formatting error on the table carrying over from page 201 to page 202. There should only be one row for “Vegetation Management Inspection Program – LiDAR” and the initiative activity row was inadvertently split up due to the page break.

REQUEST NO. 4:

On p. 209 of its WMP, Liberty provides Figure 8-4: “*Liberty VM Inspection Overview.*”

- a) Please describe what steps Liberty takes if a customer refuses access to his or her property for either a vegetation inspection or a vegetation maintenance activity.
- b) Please provide any internal protocols, handbooks, or other documents that describe the actions Liberty takes if a customer refuses access to his or her property for either a vegetation inspection or a vegetation maintenance activity.

RESPONSE TO REQUEST NO. 4:

- a) If Liberty VM field personnel are unable to perform their job function due to a customer refusing access, the refusal shall be documented in the VM system and on the Refusal Form document. If possible, the vegetation condition and vicinity to facilities should be photographed for reference and record keeping.

Liberty VM field personnel (VM inspectors, VM workers) communicate the refusal as soon as possible to their immediate supervisor for resolution. Every effort should be made by the supervisor to contact the property owner, or authorized agent to understand the basis of the refusal and determine an appropriate course of action toward resolution and work completion. Any contact or attempt made to resolve the refusal shall be documented by the employee initiating resolution. The supervisor may need to consult with Liberty VM for support if resolution is unattainable or for approval if there is a request outside of the normal scope of work that would facilitate completing work.

Should attempts to reach a resolution with the refusing party be unsuccessful, Liberty may need to take further action by researching existing land or easement rights to be able to perform vegetation work. Liberty VM should attempt to exercise land and easement rights in order to perform the required work within the appropriate mitigation timeline.

Liberty may be required to involve jurisdictional law enforcement to help facilitate completing the required work necessary to comply with applicable laws and regulations. Law enforcement should be notified, or their presence requested, to facilitate gaining access or completing vegetation management work as needed. Liberty shall notify its Legal Department and Corporate Security team to advise on all hostile customers and take the necessary action to facilitate completing required work within the appropriate mitigation timeline through a court order or temporary restraining order.

- b) Liberty is in the process of developing its VM-06, Notification and Refusal Policy which provides guidance on interfacing with landowners including communication and notification processes, management of refusal scenarios, conflict resolution strategies, and the documentation of these processes through the lifecycle of identification and mitigation of required Vegetation Management work

REQUEST NO. 5:

On p. 243 of its WMP, Liberty provides Table 8-31: “*Past Due Vegetation Management Work Orders Categorized by Age.*”

- a) In this table, does “age” refer to days since the work order was first created or days since the work order’s due date?
- b) Please explain why there are 2,588 past due work orders in HFTD Tier 2 Areas with ages of 181+ days.
- c) Please describe the actions Liberty is currently taking to address the 2,588 past due work orders in HFTD Tier 2 Areas with ages of 181+ days.
- d) When does Liberty expect that all of these 2,588 past due work orders in HFTD Tier 2 Areas with ages of 181+ days will be fully resolved? Please explain your response.

RESPONSE TO REQUEST NO. 5:

- a) Age refers to the date the work order was first created.
- b) Liberty details how work orders are prioritized based on risk and how mitigation timeframes are identified based on observed field conditions in Section 8.2.6 of the 2023 WMP (page 240 – 241) and per its VM-05, Vegetation Threat Procedure. Liberty intends to complete work orders and mitigate identified tree conditions within the timelines specified in its VM-05 based on the priority level of assigned to the vegetation work order at the time of inspection and describes this process on page 240-241 of the 2023 WMP.
- c) Of the 2,588 open work orders reported, 210 work orders remain open as of June 9th, 2023. 164 of the open work orders are on Capital improvement projects that is coordinated with Capital construction schedules. This work is currently in progress. 35 work orders on the “Sagehen” fire resilient right-of-way project had maintenance

deferred in late 2022 due to snow conditions and are planned to be completed in 2023.

Liberty is in the process of evaluating the remaining 11 work orders to determine priority and requirements beyond standard operating procedures.

- d) Liberty expects to complete the remaining 164 work orders by the end of the third quarter in 2023.

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

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