



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-13

Requesting Party: Public Advocates Office

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Date Received: June 6, 2023

Due Date: June 9, 2023

REQUEST NO. 1:

Please provide copies of the following documents:

- a) Corporate Emergency Management Plan (CEMP), dated April 27, 2022, referenced on p. 284 of your WMP
- b) Liberty Utilities Public Safety Power Shutoff Playbook, dated June 13, 2022, referenced on p. 284 of your WMP

RESPONSE TO REQUEST NO. 1:

- a) Refer to supporting materials: Liberty Corporate Emergency Management Plan (CEMP)
- b) Refer to supporting materials: Liberty Public Safety Power Shutoff Playbook

REQUEST NO. 2:

On p. 311 of its WMP, Liberty states “NV Energy is the [Transmission Owner] for Liberty... A specific plan for communicating with NV Energy including the information to be provided is included in the Liberty CEMP...”

- a) Is NV Energy the sole provider of electricity to Liberty’s circuits?
- b) If the answer to part (a) is no, please list the circuits that NV Energy provides electricity to.
- c) Please describe Liberty’s plan in the event of de-energization of its circuits by NV Energy.
- d) Has Liberty ever experienced any de-energizations (including, but not limited to PSOM) because of loss of electricity supply from NV Energy transmission lines?
- e) If the answer to part (d) is yes, please state the date of each such outage since the beginning of 2018.
- f) If the answer to part (d) is yes, for each such outage since the beginning of 2018, please elaborate on the duration, number of customers affected, and actions that Liberty took during the outage.

RESPONSE TO REQUEST NO. 2:

- a) Yes.
- b) N/A
- c) To the extent possible, Liberty will follow PSPS protocols regarding communications if an NV Energy PSOM event impacts Liberty’s power lines and customers.
- d) Liberty objects to this request as vague and ambiguous with regard to the term "de-energizations," overbroad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence. Notwithstanding the foregoing objections, Liberty responds as follows: Yes.
- e) Liberty objects to this request as vague and ambiguous with regard to the term "de-energizations," overbroad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence. Notwithstanding the foregoing objections, Liberty responds as follows: Refer to file: CalAdvocates-Liberty-2023WMP-13_Liberty Response Question 2.
- f) Liberty objects to this request as vague and ambiguous with regard to the term "de-energizations," overbroad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence. Notwithstanding the foregoing objections, Liberty responds as follows: Refer to file: CalAdvocates-Liberty-2023WMP-13_Liberty Response Question 2.

REQUEST NO. 3:

On p. 162 of its WMP, Liberty states “[T]hese programs, in particular Liberty’s SRP program, may reduce the need for PSPS in certain areas.”

- a) Please explain how Liberty’s SRP program may reduce the need for PSPS in certain areas.
- b) Please describe the decision-making process for a situation in which Liberty anticipates PSPS conditions but decides to use its SRP program instead
- c) Please list all dates in 2022 when Liberty anticipated PSPS conditions but use its SRP program instead.

RESPONSE TO REQUEST NO. 3:

- a) Liberty’s SRP program is not currently impacting Liberty’s PSPS protocols. In 2023, Liberty is working with University of Nevada, Reno (UNR) to develop the SRP settings and discuss how this could impact PSPS protocols. If SRP settings are set sensitive enough, then the ignition risk from a line could be low enough to act in place of a PSPS. The settings that Liberty is currently planning to use for the SRP system are not currently proven to be low enough to make this call. Liberty will be evaluating this topic with UNR and other major utilities in 2023.
- b) Liberty’s SRP program is not currently impacting Liberty’s PSPS protocols, and thus Liberty does not have an established decision-making process to utilize SRP as an alternative to PSPS.
- c) None.

REQUEST NO. 4:

- a) Please provide a description of the weather conditions in which Liberty enables its SRP program.
- b) Please identify the months or seasons in which Liberty enables its SRP program.
- c) Please provide relevant work documents or procedures that Liberty uses related to enabling its SRP program.

RESPONSE TO REQUEST NO. 4:

- a) Various weather conditions influence the SRP decision process, including wind conditions, temperature conditions, and moisture content.
- b) The area of Liberty service territory and weather conditions in any given year or month affect whether SRP will be enabled. Based on historical conditions, SRP settings would be enabled in the summer and early fall when the moisture content is low and temperatures and wind conditions can be high.
- c) Liberty does not have any work documents directly related to SRP.

REQUEST NO. 5:

On p. 162 of its WMP, Liberty states “Liberty will be expanding the 2022 Fast Trip, or SRP, pilot project because of its effectiveness...”

- a) In Liberty’s response to CalAdvocates-Liberty-2023WMP-03, Question 1, the excel sheet column Q “q. Total customer-minutes of de-energization on the circuit during fast-trip settings in 2021” provides a value of 20244.00 for the Circuit Meyers 3300. Please explain if the pilot SRP program began in 2021 or if Liberty used a different program for this de-energization.
- b) There are values listed in Liberty’s response to CalAdvocates-Liberty-2023WMP-03, Question 1, the excel sheet column R “r. Total customer-minutes of de-energization on the circuit during fast-trip settings in 2022”. Please clarify if the values listed in Liberty’s response were due to the SRP program pilot.
- c) Please describe the scope, planned duration, goals, and success metrics of the 2022 Fast Trip / SRP pilot project.
- d) Other than expanding which circuits may use SRP settings, as shown in Appendix C, map titled “2023 Sensitive Relay Profile Program”, on pdf p. 474 in 2023, how has Liberty modified its SRP program since 2021? For example, have the speed or sensitivity of the fast-trip settings changed?
- e) Please provide a list of the circuits included in Liberty’s SRP program in 2022.

RESPONSE TO REQUEST NO. 5:

- a) Liberty utilized a different program in 2021. Prior to the SRP program pilot in 2022, Liberty utilized “wildfire mode” settings which removes reclosing. The SRP program takes this a step further by removing reclosing and lowering the trip settings to a number that impacts relay coordination and reduces incident energy on fault conditions, which in turn reduces ignition risk.
- b) In 2022, Liberty utilized a mix of SRP settings and “wildfire mode” settings because the pilot program took time to develop, install, and commission settings.
- c) The goals in 2022 were to pilot the SRP program. This entailed working with UNR to research these settings and benchmark them against other major utilities. Liberty enabled SRP settings and began to track associated reliability metrics. With a small sample size, Liberty has not observed a noticeable decrease in reliability for the circuits on which SRP has been implemented.
- d) Liberty did not utilize SRP settings in 2021. Since the SRP program was started in 2022, there have not been any significant changes to the “speed or sensitivity” of the fast trip settings. Liberty plans to review the load seen by the overcurrent protection devices (a recloser or a substation circuit breaker) on the SRP circuits on an annual basis. This load data is then used to engineer a sensitive relay profile that aims to limit the incident energy developed on a fault event, thus reducing ignition risk, while also not “nuisance” tripping for events that are not actual faults.

e) Meyers 3300 and Topaz 1261.

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

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