



Liberty
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August 28, 2024

DATA REQUEST RESPONSE

LIBERTY UTILITIES (CAPECO ELECTRIC) LLC 2023-2025 Wildfire Mitigation Plans

Data Request No.: CalAdvocates-Liberty-2025WMP-02

Requesting Party: The Public Advocates Office

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Due Date: August 28, 2024

The following questions relate to responses provided to CalAdvocates-Liberty-2025WMP-01 and the filing of Liberty's Quarterly Data Report for the second quarter of 2024.

Question 1:

Liberty's response to question 4 of data request CalAdvocates-Liberty-2025WMP-01 states: "Liberty does not have a previous version [of its Spacer Cable Inspection Checklist]."

Please explain which portions of the Spacer Cable Inspection Checklist, found in Appendix A of Liberty's 2025 WMP Update, correspond with the each of the identified failures specific to covered conductor listed below:

- Water intrusion; Splice covers; Surface damage/bulging; Bracket placement

Response to Question 1:

- Water intrusion: Safety Standards – Meets construction standards; Taps and Splices – Splices covered with Hendrix KM splice or equivalent; Hardware/Messenger – Adequate slack between phase conductors.
- Splice covers: Safety Standards – Meets construction standards; Taps and Splices – Bushing covers used on transformers.
- Surface damage/bulging: Meets construction standards; Material – Used all Hendrix approved components; Material – Only covered Tie Wires used; Taps and Splices – Rubber covered transformer tap wire used.
- Bracket placement: Safety Standards – Meets construction standards; Taps and Splices – Anti Sway brackets (BAS-14/24) used at poles with taps.

Question 2:

Liberty's response to question 7(b) of data request CalAdvocates-Liberty-2025WMP-01 states that "The timeline for finalizing the development of arrestors in Liberty's asset tracking application is not determined at this time."

- a) Will Liberty start the planning and development of the asset tracking application during the 2026-2028 WMP cycle?
- b) If the answer to part (a) above is yes, does Liberty plan to consult with a third-party vendor or to develop the asset tracking application internally?
- c) If Liberty plans to use a third-party vendor, please provide the name of the vendor and a description of the projected duties and responsibilities related to the development of the asset tracking application.
- d) Does Liberty currently have processes in place to track and record which non-exempt lightning arrestors have been replaced across its service territory?
- e) If the answer to part (d) above is yes, provide a copy or description of Liberty's processes regarding replacement of non-exempt lightning arrestors.

Response to Question 2:

- a) The asset tracking application is already developed and in production use. Liberty will enhance the application over the 2026-2028 WMP cycle to add tracking for lightning arrestors.
- b) Liberty developed the application internally using the third party application Fulcrum and plans to develop future enhancements internally.
- c) N/A
- d) No; Liberty has not replaced non-exempt lightning arrestors across its service territory.

e) N/A

Question 3:

Liberty has provided an update on initiative “WMP-GDOM-GH-01: Covered conductor installation,” in Table 1 of the Excel file attachment titled “*Liberty_2024_Q2_Tables115_R0.xlsx*”. Table 1 states Liberty has completed zero circuit miles of covered conductor installation as of the second quarter 2024 Quarterly Data Report filing.

- a) Please explain why Liberty has not completed any circuit miles of covered conductor installation in 2024.
- b) Please provide a list of all covered conductor projects that were planned for 2024-2025 and that have been delayed due to permitting issues.
- c) Please provide an Excel document that lists each covered conductor project identified in your response to part (b), which should include the following information in separate columns, at a minimum:
 - a. Circuit ID number
 - b. Name of circuit, if applicable
 - c. Designation of HFTD area
 - d. The expected or actual start date of the covered conductor project
 - e. The expected completion date of the covered conductor project, when Liberty submitted its 2023-2025 WMP
 - f. The expected completion date of the covered conductor project, as of now.

Response to Question 3:

- a) Liberty has experienced permitting delays and construction delays with its planned projects due to limited operating periods imposed by the US Forest Service. Liberty has also experienced material delays in 2024.
- b) Angora Ridge and Fallen Leaf C covered conductor projects.
- c)

| Project | a. Circuit ID | b. Name of circuit | c. HFTD tier | d. Expected or actual start date | e. Expected completion date from 2023 WMP | f. Expected completion date from 2025 WMP |
|---------------|---------------|--------------------|--------------|----------------------------------|---|---|
| Angora Ridge | Meyers 3400 | Meyers | Tier 2 | 8/5/2024 | 12/31/2024 | 12/31/2024 |
| Fallen Leaf C | Meyers 3400 | Meyers | Tier 2 | 9/16/2024 | 12/31/2024 | 12/31/2024 |
| 7300 Phase 9 | 7300 | 7300 | Tier 2 | 8/19/2024 | 12/31/2024 | 9/30/2024 |

Question 4:

Liberty has provided an update on initiative “WMP-GDOM-GH-02: Undergrounding of electric lines and/ or equipment,” in Table 1 of the Excel file attachment titled “*Liberty_2024_Q2_Tables115_R0.xlsx*”. Table 1 states Liberty has completed zero circuit miles of undergrounding of electric lines and/or equipment as of the second quarter 2024 Quarterly Data Report filing.

Please explain why Liberty has not completed any circuit miles related to the undergrounding of electric lines and/or equipment in 2024.

Response to Question 4:

As explained in Liberty’s 2024 WMP Change Order Request, Liberty will not be completing its undergrounding target in 2024 due to project delays and permitting issues.

Question 5:

Liberty has provided an update on initiative “WMP-GDOM-GH-12b: Expulsion fuse replacement,” in Table 1 of the Excel file attachment titled “*Liberty_2024_Q2_Tables115_R0.xlsx*”. Table 1 states Liberty has completed eight expulsion fuse replacements as of the second quarter 2024 Quarterly Data Report filing.

- a) Please provide a brief description of Liberty’s plan to replace the remaining 492 expulsion fuses to achieve its targeted goal of 500 expulsion fuse replacements in 2024.
- b) Does Liberty have an estimated number of expulsion fuses replacements that it will complete by the end of quarter 3?

Response to Question 5:

- a) Liberty has replaced 184 expulsion fuses through July 2024. Liberty plans to meet its target of 500 expulsion fuse replacements in 2024.
- b) Liberty does not have an expulsion fuse replacement quarterly target for Quarter 3 of 2024.

Question 6:

Regarding Liberty’s initiative “WMP-GDOM-AI-05: Quality assurance/ quality control of inspection,” as part of Liberty’s presentation during the 2025 Wildfire Mitigation Plan Update Group 2 Workshop, Liberty stated that by the end of 2025 Liberty will achieve a target of 12% of detailed asset inspections, while achieving a 90% pass rate.

- a) Will Liberty conduct any QA/QC of detailed inspections during 2024?
- b) If the answer to part (a) above is yes, what percentage of detailed inspections will Liberty target?

- c) If the answer to part (a) above is yes, does Liberty have a target pass rate for 2024?

Response to Question 6:

- a) Yes.
b) 12%.
c) Yes. Refer to Section 6.11 of Liberty's 2025 WMP Update.