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June 6, 2023

DATA REQUEST RESPONSE

LIBERTY UTILITIES (LIBERTY) 2023-2025 Wildfire Mitigation Plans

Data Request No.: CalAdvocates-Liberty-2023WMP-11

Requesting Party: Public Advocates Office

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REQUEST NO. 1:

Page 109 of Liberty's WMP states that "Liberty sought to separately strategize future risk model refinements and approaches by onboarding new vendors to help develop a formal risk model decision framework for Liberty."

- a) Are the "new vendors" that Liberty refers to above IBM and Direxyon?
- b) If the answer to part (a), above is no, please provide the name of the vendors and a description of how Liberty is utilizing each vendor to develop its formal risk model decision framework.

RESPONSE TO REQUEST NO. 1:

- a) Yes.
- b) N/A

REQUEST NO. 2:

Pages 109-110 discuss Liberty's risk evaluation process and how Liberty utilizes Figure 7-1: Risk Identification and Analysis for WMP. With this context:

- a) What is the total number of "discussion points" that Liberty will plot on Figure 7-1 while conducting its risk evaluation process?
- b) Please list all of the "discussion points" that Liberty will plot on Figure 7-1 as part of the risk identification and analysis.
- c) Please provide any documents generated from Liberty's risk evaluation process related to the Topaz circuit.
- d) Please provide any documents generated from Liberty's risk evaluation process related to the Muller circuit.
- e) Please provide any documents generated from Liberty's risk evaluation process related to the Meyers circuit.

RESPONSE TO REQUEST NO. 2:

- a) Liberty does not know the total number of discussion points that will be included in its risk evaluation process as Liberty advances its risk model decision framework.
- b) Examples of discussion points included in the risk evaluation process are:
 - identification of all risk events;
 - likelihood of wildfire risk drivers;
 - impacts of significant weather (snow and wind) on asset degradation and health;
 - scenario analyses discussion; and
 - how seasonality affects the planning of overhead system design and operations.
- c) Liberty does not have any documents generated from the process related to the Topaz circuit.
- d) Liberty does not have any documents generated from the process related to the Muller circuit.
- e) Liberty does not have any documents generated from the process related to the Meyers circuit.

REQUEST NO. 3:

Pages 116-117 of Liberty's WMP identify the Topaz circuit as being in an area of elevated wildfire risk. Liberty also states that it did not assess risk drivers impacting the overall risk score and used older studies to support this WMP. With this context:

- a) Does Liberty have any system hardening mitigation work planned in 2023 for the Topaz circuit listed above?

- b) If the answer to part (a) above is yes, please identify the mitigation work selected for the circuit.
- c) If the answer to part (a) above is no, please explain why Liberty has chosen not to conduct mitigation work on this circuit in 2023.
- d) Does Liberty have any system hardening mitigation work planned in 2024 for the Topaz circuit listed above?
- e) If the answer to part (d) above is yes, please identify the mitigation work planned for 2024.

RESPONSE TO REQUEST NO. 3:

- a) Yes.
- b) Liberty is completing traditional overhead hardening on three projects in 2023. Those projects are Cunningham Lane, Eastside Lane, Larsen Lane. Liberty is also replacing or repairing various poles on this circuit to address needs found during system surveys.
- c) N/A
- d) Yes.
- e) Liberty plans to complete approximately two miles of traditional overhead hardening in 2024. Those projects are still being determined. Liberty is also replacing or repairing various poles on this circuit to address needs found during system surveys

REQUEST NO. 4:

Pages 116-117 of Liberty's WMP identify the Muller circuit as being in an area of elevated wildfire risk. Liberty also states that it did not assess risk drivers impacting the overall risk score and used older studies to support this WMP. With this context:

- a) Does Liberty have any system hardening mitigation work planned in 2023 for the Muller circuit listed above?
- b) If the answer to part (a) above is yes, please identify the mitigation work selected for the circuit.
- c) If the answer to part (a) above is no, please explain why Liberty has chosen not to conduct mitigation work on this circuit in 2023.
- d) Does Liberty have any system hardening mitigation work planned in 2024 for the Muller circuit listed above?
- e) If the answer to part (d) above is yes, please identify the mitigation work planned for 2024.

RESPONSE TO REQUEST NO. 4:

- a) Yes.
- b) Liberty is replacing or repairing various poles on this circuit to address needs found during system surveys.

- c) N/A
- d) Yes.
- e) Liberty is replacing or repairing various poles on this circuit to address needs found during system surveys. Liberty is also planning to do some system hardening on this circuit. The first project will likely occur in 2025 but there is a possibility that it may be as soon as 2024.

REQUEST NO. 5:

Pages 116-117 of Liberty's WMP identify the Meyers circuit as being in an area of elevated wildfire risk. Liberty also states that it did not assess risk drivers impacting the overall risk score and used older studies to support this WMP. With this context:

- a) Does Liberty have any system hardening mitigation work planned in 2023 for the Meyers circuit listed above?
- b) If the answer to part (a) above is yes, please identify the mitigation work selected for the circuit.
- c) If the answer to part (a) above is no, please explain why Liberty has chosen not to conduct mitigation work on this circuit in 2023.
- d) Does Liberty have any system hardening mitigation work planned in 2024 for the Meyers circuit listed above?
- e) If the answer to part (d) above is yes, please identify the mitigation work planned for 2024.

RESPONSE TO REQUEST NO. 5:

- a) Yes.
- b) Liberty is planning to complete two covered conductor projects on Meyers circuits in 2023. Those projects are Celio A (1.6 miles) and Celio B (0.93 miles). Liberty will also complete 0.11 miles of undergrounding on the Cascade Project. Liberty is also replacing or repairing various poles on these circuits to address needs found during system surveys.
- c) N/A
- d) Yes.
- e) Liberty is planning to complete two covered conductor projects on Meyers circuits in 2023. Those projects are Fallen Leaf B (1.53 miles) and Angora (0.70 miles). The Angora Project includes a microgrid. Liberty is also replacing or repairing various poles on these circuits to address needs found during system surveys

REQUEST NO. 6:

Page 127 of Liberty's WMP states, "Liberty is currently evaluating wildfire risk results in consultation with its analytics team. Liberty has developed an interim mitigation strategy for its vegetation portfolio and plans to expand this strategy to incorporate assets in the future."

When does Liberty anticipate it will have expanded its interim mitigation strategy to incorporate asset management measures, as referenced in the quote?

RESPONSE TO REQUEST NO. 6:

During the 2023-2025 WMP cycle.

REQUEST NO. 7:

Page 128 of Liberty's WMP states, "Liberty is actively planning and executing wildfire mitigation initiatives while developing its risk based decision-making process."

- a) Are any WMP activities or initiatives that Liberty is executing in 2023 based upon the abovementioned risk based decision-making process?
- b) If the answer to part (a) is yes, please explain which activities or initiatives in 2023 flow from the risk based decision-making process.
- c) If the answer to part (a) is no, please explain why not.

RESPONSE TO REQUEST NO. 7:

- a) No.
- b) N/A
- c) The abovementioned risk based decision-making process is not complete. Liberty used risk-based principles and tools (i.e., Reax risk map) to inform decision-making.

REQUEST NO. 8:

Page 135 of Liberty's WMP states:

In conjunction with this study, Liberty also plans to assess the asset risk reduction and vegetation risk reduction at an operational performance level utilizing IBM's work management platform. IBM's Maximo asset health and predict solution that was customized for Liberty will integrate asset risk and detailed vegetation risk scores to help asset and vegetation managers better assess operational risk to plan and adjust work activities for significant weather event days, including elevated high fire risk days.

- a) Describe the success criteria for the abovementioned IBM Maximo project – in other words, what criteria is Liberty using to evaluate the accuracy of the asset and vegetation risk scores produced by IBM's Maximo platform?
- b) When (i.e., month and year) will the abovementioned platform be complete and operational?
- c) Please describe each specific way that Liberty anticipates utilizing the abovementioned IBM work management platform to inform its 2023-2025 wildfire mitigation strategy.

RESPONSE TO REQUEST NO. 8:

- a) Examples of evaluation criteria Liberty considered are cost, accuracy of risk identification and model outputs, system compatibility, the feasibility of scenarios and the ability to operationalize model outputs given available resources.
- b) Liberty has decided to not move forward with IBM's proposed solution at this time.
- c) Liberty has decided to not move forward with IBM's proposed solution at this time.

REQUEST NO. 9:

Page 138 of Liberty's WMP states:

Liberty's risk-informed decision-making framework is under development. Liberty's engineering, planning, and regulatory staff will need three to six months post-product/service delivery of all risk studies to fully engage with internal subject matter experts to evaluate the results of the risk analyses.

- a) When (i.e., month and year) does Liberty expect the development (referenced in the quote above) of the risk-informed decision-making framework to be finished?
- b) When (i.e., month and year) does Liberty expect all risk studies to be delivered (as mentioned in the quote above)?
- c) Please estimate when (i.e., month and year) Liberty expects to be able to utilize the abovementioned risk-informed decision-making framework to scope planned system hardening projects for the future.
- d) Please describe how Liberty planned system hardening projects occurring in 2023.
- e) Please describe how Liberty planned or will plan system hardening projects that will start in 2024.

RESPONSE TO REQUEST NO. 9:

- a) Liberty plans to have an initial risk-informed decision-making framework for overhead assets by August 2023.
- b) Liberty does not know the timeline for when all risk studies will be delivered. Liberty's wildfire risk modeling is an ongoing process that is informed by the results of current risk studies (i.e., Technosylva modeling results, Reax modeling results, Direxyon outputs), OEIS risk modeling guidelines, and collaborative discussions with stakeholders through processes such as the Risk Modeling Working Group
- c) Beginning in 2025.
- d) Liberty uses the Reax fire risk polygons and subject matter expert knowledge to target specific areas that have the highest wildfire risk or previous reliability or safety issues.
- e) Liberty will use the Reax fire risk polygons, its circuit risk assessment, and subject matter expert knowledge to target specific areas that have the highest wildfire risk or previous reliability or safety issues.

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

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