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May 12, 2021

DATA REQUEST RESPONSE

LIBERTY UTILITIES (CALPECO ELECTRIC) LLC

2021 WMP Update

Data Request No.: WSD-Liberty-2021WMP-04
Subject Matter: 2021 Wildfire Mitigation Plans
Originator: Ryan Arba
Due Date: May 12, 2021

REQUEST NO. 1:

In Table 12 of Liberty's 2021 WMP Update, what are the units for spending in columns T – AE? (i.e., dollars or thousands of dollars.)

RESPONSE TO REQUEST NO. 1:

The units for spending in columns T – AE on Table 12 of Liberty's 2021 WMP Update are in dollars. The labels in row 6 incorrectly state thousands of dollars because Liberty inadvertently did not change that row of the template provided by WSD.

REQUEST NO. 2:

In its 2020 WMP, Liberty projected 2020 Data Governance costs to be \$665,000 (Liberty's 2020 WMP, page 36), but in its 2021 WMP Update, Liberty recorded 2020 actual Data Governance costs to be \$1,138 (Liberty's 2021 WMP Update, Table 12, Rows 77-80), a significant decrease from the 2020 projections, with no accompanying increase in 2021 or 2022 spending projections. Additionally, in its 2021 Maturity Survey responses, Liberty's responses to all questions within the Data Governance capability are equal or more mature than the responses provided for the Maturity Survey in 2020.

- a. Explain in full and complete detail the reason(s) for the significant discrepancy in Data Governance spending between 2020 projected (as reported in the 2020 WMP) and 2020 actual (as reported in the 2021 WMP Update).
- b. Explain in full and complete detail how Liberty continues to be on-track to meet its 2023 maturity goals while spending significantly less than it had projected for 2020.

RESPONSE TO REQUEST NO. 2:

- a. The forecast 2020 spend of \$665,000 for Data Governance included the following components:
- Risk/Data Analyst Position - \$100,000
 - Operations Analyst Position - \$115,000
 - Emerging Technology Programs - \$200,000
 - WMP Delivery - \$250,000

The actual 2020 spend for Data Governance differed from the forecast for the following reasons:

- The WMP labor costs associated with the two positions listed above were captured in the Adequate and Trained Workforce for Service Restoration WMP initiative (7.3.9.1) in the Emergency Planning and Preparedness WMP category. Liberty did not split out labor for each initiative and captured WMP incremental labor costs for new positions in the Adequate and Trained Workforce for Service Restoration WMP initiative to be consistent with how WMP-related labor costs are recorded in Liberty's memorandum and balancing accounts.
 - The \$1,138 costs shown for the Data Governance WMP category are associated with the forecast for Emerging Technology Programs and specifically for a High Impedence Fault Detection ("HIFD") study with the University of Reno ("UNR"). The remaining forecasted costs for the HIFD UNR study were not incurred in 2020 due to contractor delays. The other forecasted Data Governance 2020 WMP costs associated with this initiative were for a Distribution Fault Anticipation ("DFA") study with Texas A&M. The actual 2020 costs of \$158,124.90 for this study were captured in the Continuous Monitoring Sensors WMP initiative (7.3.2.2.).
 - The forecast WMP delivery costs for 2020 were primarily based on an estimate of working with a consultant, which did not materialize. Instead, Liberty used primarily in-house resources to develop its 2021 WMP Update.
- b. Liberty continues to be on track to meet its 2023 maturity goals for Data Governance. As explained in response to Question 2a, much of the WMP 2020 cost forecast for Data Governance was recorded in other WMP initiatives (i.e. labor, DFA study) or not incurred in 2020 either due to contractor delays (i.e. HIFD study) or because Liberty utilized in-house resources to perform work forecasted for a consultant (i.e. 2021 WMP Update delivery).

REQUEST NO. 3:

In its 2021 WMP Update, Liberty provided two different spends for 2020 covered conductor installation. In Table 7-3: 2020 Covered Conductor Projects, Liberty reported a total spend of \$7,486,111. In Table 12, Liberty reported a total spend of \$7,820,185.

- a. Provide an explanation for the spend discrepancy, and
- b. Provide the correct spend in a table format similar to Table 7-3 with totals for each of the columns.

RESPONSE TO REQUEST NO. 3:

- a. Spend discrepancy is due to Table 7-3 only showing projects that were completed and constructed in 2020. Table 12 accounts for all covered conductor project spend which includes design and permitting costs for projects yet to be constructed. It should be noted that projects that have not been constructed yet show planned number of poles and mileage of wire to be replaced. Actuals may differ slightly once construction is complete due to in field construction changes.
- b. Please see Excel table “Liberty Response to WSD-Liberty-2021WMP-04_Q3b and Q4b.”

REQUEST NO. 4:

In Table 12 of its 2021 WMP Update, Liberty reported the 2021 and 2022 total projected spend for covered conductor installation to be \$16,564,617 and \$12,034,498, respectively. However, Liberty reported “TBD” for one project in Table 7-4: 2021 Covered Conductor Projects, and two projects in Table 7-5: 2022 Covered Conductor Projects.

- a. Describe how the Table 12 spend amounts were calculated when there are “TBD” project spends in tables 7-4 and 7-5
- b. Provide the correct projected spend in a table format similar to Table 7-3 with totals for each of the columns.

RESPONSE TO REQUEST NO. 4:

- a. Table 12 TBD spend amounts were estimated based on a best guess for a resiliency corridor type project. Liberty has not completed a resiliency corridor type project but once project design is complete, Liberty will have an estimate of poles to be replaced as well as length of covered conductor to be installed, which will allow costs to be estimated.
- b. Please see Excel table “Liberty Response to WSD-Liberty-2021WMP-04_Q3b and Q4b.”

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

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Reply for 3B Reply for 4B Reply for 4B

Project Name	Design Type	2020 Total Spend	2021 Total Spend	2022 Total Spend	Number of Poles	Mileage	Tree removals	Trims	Notes
Cascade	ACS Bundled Conductor	41,031			13	0.48			Construction planned after 2022
Lily Lake	ACS Bundled Conductor	89,499	4,541,554		50	2			
Meyers Celio-A	Tree Wire	-	50,000	1,896,230	36	1.6			
Meyers Celio-B	Tree Wire	-	50,000	1,338,530	23	0.75			
Angora Ridge	ACS Bundled Conductor	93,872			46	1.7			Construction planned after 2022
Bridge Tract	ACS Bundled Conductor	58,230	2,203,432		24	0.9			
Cathedral Park - A	ACS Bundled Conductor	46,488	3,491,538		37	1.5			
Cathedral Park - B	ACS Bundled Conductor		100,000	2,000,000	43	2.25			
Vikingsholm	ACS Bundled Conductor	1,625,465			26	1.25	44.25	93	Constructed in 2020. (.25 tree refers to brush)
640A & 3100	Covered transmission	79,742	50,000	3,465,000	75	3.2			
640B	Covered transmission	155	50,000	50,000	53	2.6			Construction planned after 2022
Brockway 4202	ACS Bundled Conductor and Underground	319,699	233,300		13	0.35			
Brockway 5100	TBD			100,000	39	2			Construction planned after 2022
Fallen Leaf - A	Tree Wire		75,000		24	0.67			Construction planned after 2022
Fallen Leaf - B	ACS Bundled Conductor		75,000		45	1.53			Construction planned after 2022
Stateline 2300	ACS Bundled Conductor		25,000	192,000	8	0.19			Construction planned after 2022
Lily Ave	Small Covered Conductor	643	99,750	104,738	4	0.03			
Topaz 1261 Phase 2	Tree Wire	591,752			13	0.47			
Topaz 1261 Phase 4	Tree Wire	1,155,133			41	1.8	24	3	Constructed in 2020
Topaz 1261 Phase 5	Tree Wire	796,253			39	0.9			
Topaz 1261 Phase 6	Tree Wire		1,461,400		37	1.5			
7300 Phase 3A	ACS Bundled Conductor	731,325			12	0.5	28	14	Constructed in 2020
7300 Phase 3B	ACS Bundled Conductor	354,226			13	0.45			
7300 Phase 4	ACS Bundled Conductor	895,379			21	0.75	18	35	Constructed in 2020
7300 Phase 5	ACS Bundled Conductor	895,408			20	0.7	11	27	Constructed in 2020
7300 Phase 6	ACS Bundled Conductor	45,883	1,198,643		27	0.85			
7300 Phase 7	ACS Bundled Conductor	-	60,000	688,000	27	0.68			
7300 Phase 8	ACS Bundled Conductor			100,000	TBD	TBD			Construction planned after 2022
Hobart	Tree Wire		2,800,000		70	2.5			
Resiliency Corridor (not finalized yet)	TBD			2,100,000	TBD	TBD			
Total		7,820,185	16,564,617	12,034,498	879	34.09841	125.25	172	