# Appendix A

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# ATTACHMENT 1

# Cal Advocates' Response to Liberty-CalAdvocates-DR-003

**Public Advocates Office's Response to Data Request**

**Proceeding: A.25-06-017: Cost Recovery for Mountain View Fire**

| | |
|---|---|
| Data request: | Liberty-CalAdvocates-DR-003 |
| Date of receipt: | December 23, 2025 |
| Response date: | January 8, 2025 |

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## DEFINITIONS

"Cal Advocates" shall mean the Public Advocates Office at the California Public Utilities Commission and any of its current or former employees, agents, consultants, attorneys, officials, or any persons acting on its behalf.

"Proceeding" shall mean Application of Liberty Utilities (CalPeco Electric) LLC (U 933-E) for Authority to Recover Costs Related to the 2020 Mountain View Fire Recorded in the Wildfire Expense Memorandum Account (A.25-06-017).

"Relate to" shall mean to consist of, reflect, comprise, discuss, underlie, comment upon, form the basis for, analyze, mention, or be connected with, in any way, the subject of the Data Request.

## RESPONDING WITNESS

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## REQUESTS

### Request 1

On page 3 of CA-01, Cal Advocates states: "Of particular concern was the Slink Fire, which burned 26,752 acres and threatened the cities of Coleville and Walker until it was contained on November 13, 2020, just four days before the Mountain View Fire started." Please provide all support for the statement that the Slink Fire "threatened the cities of Coleville and Walker" in November 2020.

**Response:**

Exhibit CA-01 summarizes the findings of Cal Advocates' various exhibits. For further support for this statement, please see Exhibit CA-03.

### Request 2

Provide all information related to the fires included in CA-03, Figure 4 (on page 10). Please include the following information with respect to each fire:

a) Name, if applicable
b) Ignition date and time
c) Full containment date and time
d) Cause of ignition, if known
e) Acreage burned
f) Number of structures burned, if any

**Response:**

For Q2 (a) to (e), please refer to the attached spreadsheets titled "A.25-06-017 Liberty-CalAdvocates-DR-003_Q2_CA_NV_Fire_History.xlsx," and "A.25-06-017 Liberty-CalAdvocates-DR-003_Q2_Walker_Fire_History.xlsx," which isolates the fires near Walker.

For Q2 (f), the dataset underlying CA-03, Figure 4 does not include number of structures burned. To obtain this data, Liberty can contact CAL FIRE or the lead responsive agency for each incident. Cal Advocates does not have further information regarding the number of structures burned.

**Request 3**

With respect to the Slink Fire, please provide the following information:

a) Cause of ignition
b) Date when evacuation orders were initiated and for what areas
c) Date when such evacuation orders were lifted
d) Dates when containment of the fire reached 50%; 70%; 80%; 90%; and 95%
e) Date on which the Slink Fire reached approximately 26,752 acres in size

**Response:**

a) According to CA-03 Supporting Attachment #9 CAL FIRE historical fire perimeters geodatabase, the cause of ignition for the Slink Fire is unknown/unidentified.

b) Cal Advocates does not keep records on evacuation orders. Please contact Bureau of Land Management Bishop Field Office, the United States Forest Service, and the Mono County Sheriff's Office for the dates on which evacuation orders were initiated and for what areas. Please refer to CA-03 Supporting Attachment #14, a news article titled "Slink Fire grows to 26,752 acres with 86% containment; evacuations lifted," which mentions emergency closures for certain Bureau of Land Management-managed public lands and certain areas within the Humboldt-Toiyabe National Forest.

c) Please contact the Bureau of Land Management Bishop Field Office, the United States Forest Service, and the Mono County Sheriff's Office for the dates on which evacuation orders were lifted. Cal Advocates does not have further information regarding the dates on which the evacuation orders were lifted.

d) Cal Advocates does not have the dates when containment of the fire reached 50%; 70%; 80%; 90%; and 95%. Liberty can contact CAL FIRE for the dates on which the Slink Fire reached 50%, 70%, 80%, 90%, and 95% contained. Please refer to CA-03 Supporting Attachment #14, a news article titled "Slink Fire grows to 26,752 acres with 86% containment; evacuations lifted," which is dated September 28, 2020.

e) Please contact CAL FIRE for the exact date on which the Slink Fire reached a burn size of approximately 26,572 acres. Please refer to CA-03 Supporting Attachment

#14, a news article titled "Slink Fire grows to 26,752 acres with 86% containment; evacuations lifted," which reported that the Slink Fire burned 26,752 acres by Monday evening, September 28, 2020. Cal Advocates does not have further information regarding the exact dates.

**Request 4**

At the time that Cal Advocates served its intervenor testimony on December 12, 2025, was Cal Advocates aware of the information provided in response to Request 3?

**Response:**

Cal Advocates was aware of information provided in its Supporting Attachments at the time of intervenor testimony submission on December 12, 2025. As indicated in response to Q3, Cal Advocates does not keep and therefore was not aware of specific information relating to evacuation orders.

**Request 5**

On page 13 of CA-03, Cal Advocates states, "This split [in NWS forecast zones] suggests the two regions (Topaz Lake/Walker and Lake Tahoe) are different enough to necessitate two distinct forecast zones."

a) With respect to this statement, what are the specific differences that Cal Advocates contends exist between the Topaz Lake/Walker and Lake Tahoe regions? Provide all support for this response.

b) Please explain the relevance of these differences with respect to Liberty's prudence showing in this Proceeding. Provide all support for this response.

**Response:**

(a) Cal Advocates contends that the two regions (Topaz Lake/Walker and Lake Tahoe) experience different levels of Red Flag Warning issuances as reflected in CA-03 Figure 6 (p.19) and different cumulative precipitation levels as reflected in CA-03 Figure 12 (p.29). Please refer to CA-03 Supporting Attachment 16 (Iowa State University, Iowa Environmental Mesonet) and CA-03 Supporting Attachment 22 (Oregon State University PRISM Group), respectively, for Red Flag Warning and

precipitation data.

(b) Cal Advocates testimony in CA-03 regarding the wind threat and precipitation differences between Topaz Lake/Walker and Lake Tahoe does not draw conclusions regarding Liberty's prudence of operations or lack thereof.

**Request 6**

Does Cal Advocates contend that a Red Flag Warning and/or a Fire Weather Watch was issued by the National Weather Service for the Walker area for November 17, 2020? If so, provide all support for this contention.

**Response:**

No, Cal Advocates does not contend that the National Weather Service issued a Red Flag Warning and/or Fire Weather Watch for November 17, 2020.

**Request 7**

Does Cal Advocates contend that Reax Engineering was unqualified to be engaged by Liberty to support the creation of de-energization thresholds in Liberty's PSPS protocol, which were in effect as of November 17, 2020? If so, provide all support for this contention.

**Response:**

Cal Advocates' findings in CA-05 do not draw conclusions about whether Reax Engineering was unqualified to be engaged by Liberty to support the creation of de-energization thresholds in Liberty's PSPS protocol.

**Request 8**

On page 17 of CA-05, Cal Advocates states that "the ERC percentile forecast relies on the Walker RAWS data." Please provide all support for this statement.

**Response:**

See CA-05, pages 15-17. Materials provided by Liberty described the "Energy Release Component

(ERC) as "a key index **calculated from Remote Automated Weather Station ('RAWS') observations** as part of the US National Fire Danger Rating System ('NFDRS')."[1]

Cal Advocates' witness used professional judgment to determine the most likely data source underlying Liberty's ERC percentile forecasts.

Liberty states:[2]

> Liberty did not measure or calculate ERC in real-time, as Liberty understands that term. ERC is a National Fire Danger Rating System ("NFDRS") index. **Liberty's ERC percentile forecasts were obtained from the U.S. Forest Service Wildland Fire Assessment System ("WFAS")** and updated on Liberty's fire weather dashboard daily.

Reax Engineering's *De-energization Thresholds for Prevention of Catastrophic Wildfires*, August 20, 2019, page 6, states:[3]

> Based on these considerations, it is recommended that seasonal factors associated with intermediate to long term drying be quantified here via ERC. **The USFS WFAS provides two real-time sources of ERC values**. The first provides NFDRS indices – including ERC – based on current observations [6] **as well as a one-day weather forecast** [7]. Data are provided in tabular form **for each reporting RAWS station**.

The above referenced endnote [7] is https://www.wfas.net/images/firedanger/fdr_fcst.txt. An excerpt of that webpage is displayed below showing headers for the California section and an excerpt of the Walker RAWS forecast.

**Figure 1. Excerpt from WFAS RAWS one-day forecast.**[4]

| ***** California ***** | Elev | Lat | Long | Mdl | Tmp | RH | Wind | PPT | ERC | BI | SC | KBDI | HUN | THOU | TEN | STL | ADJ | IC | (Staffing Specs) |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| 40101 CAMP SIX LOOKOUT | 3698 | 41.8 | 123.8 | 16V | 53 | 69 | 2 | .00 | 0 | 0 | 0 | 688 | 26 | 18 | 24 | | | 0 | / / /90/97 |
| 40102 GASQUET 2 | 452 | 41.8 | 123.9 | 16V | 66 | 64 | 2 | .00 | 0 | 0 | 0 | 708 | 28 | 23 | 26 | | | 0 | / / /90/97 |
| 43707 WALKER | 5440 | 38.5 | 119.4 | 16X | 68 | 34 | 8 | .00 | 37 | 79 | 33 | 526 | 12 | 13 | 13 | 2 | L | 11 | ERC/ 98/106/90/97 |

In DR CalAdvocates-LIB-A2506017-035, Question 2, Cal Advocates attempted to confirm this that Walker RAWS data was used in developing Liberty's ERC forecast, and requested the data sources underlying Liberty's ERC percentile forecasts. Specifically, Cal Advocates requested weather station ID, weather station name, and time period for data used. In response, Liberty stated that "Liberty obtained ERC percentile forecasts displayed on its fire weather dashboard from WFAS. Liberty was an end-user, not a developer, of these ERC percentile forecasts."

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[1] See CA-05, Attachment 8, question 1, attachment "2019-08-20 Liberty Utilities de-energization thresholds_Redacted.pdf" at 4.
[2] Liberty's amended response to data request CalAdvocates-LIB-A2506017-017, October 22, 2025, question 1.
[3] Liberty's supplemental response to data request CalAdvocates-LIB-A2506017-032, November 18, 2025, question 1, attachment "2019-08-20 Liberty Utilities de-energization thresholds_Redacted.pdf" at 6.
[4] Available at https://www.wfas.net/images/firedanger/fdr_fcst.txt. Accessed on December 28, 2025.

Because Liberty was unwilling or unable to provide the name or ID of the underlying weather stations, Cal Advocates' witness used professional judgment to determine the most likely RAWS data source relied on in determining the ERC percentile forecast for the Topaz 1261 circuit.

**Request 9**

Does Cal Advocates contend that Liberty should not have taken the 1261 R2 Recloser out of fire mode on November 10, 2020? If so, provide all support for this contention.

**Response:**

No, Cal Advocates does not contend that Liberty should not have taken the 1261 R2 Recloser out of fire mode on November 10, 2020.

**Request 10**

Page 8 of CA-06 states: "Had Liberty elected to change the R2 Recloser setting to fire mode, the phase-to-ground fault that caused the fire would not have occurred." Please provide all support for this statement.

**Response:**

Had Liberty changed the 1261 R2 Recloser setting to fire mode, there would be NO reclose operations taken place after the circuit segment tripped and de-energized due to the phase-to-ground faults, thus minimizing the likelihood of multiple arcing (from the two reclose operations) that ignited the grassy area and caused the ignition of a wildfire.

Not changing the R2 Recloser settings from normal mode to fire mode would result in two reclose operations that significantly increased the probability of ignitions because of the energized downed phase conductor contacting the earth on two separate occasions (from the two reclose operations) within 15 seconds, creating a chaotic ground fault current condition in a grassy area.

If the 1261 R2 Recloser setting was in fire mode, the Recloser would have tripped and locked out, and would not reclose. The tripping operation de-energized the C phase conductor that contacted the earth. The arcing and thus probability of ignition would have been minimized.

**Request 11**

On page 10 of CA-07, Cal Advocates provides a list it describes as typical best practices for operating electrical facilities in HFTDs, including:

- System hardening, particularly in high wind areas
- Enhanced vegetation management to avoid contact with energized lines
- Operational protocols, including weather triggered patrols or shutoffs
- Policy for reassessment of circuit risk, especially in HFTDs

Cal Advocates states that Liberty "did not implement any of the items listed above prior to the Mountain View Fire." For each category listed above, provide all support for Cal Advocates' statement that Liberty had not begun implementing such practices prior to the Mountain View Fire.

**Response:**

Cal Advocates provides four categories of typical best practices for ignition risk mitigation commonly expected on circuits operating in high wind speed HFTDs. Cal Advocates states that: "Liberty still did not implement any of these items listed above prior to the Mountain View Fire."[5]

What follows supports the record for each category using Liberty's own descriptions, and the data Liberty provided to Cal Advocates when it asked for verification.

**System Hardening**

Cal Advocates' statement that Liberty had not implemented industry best practices for fire risk system hardening on Topaz 1261 prior to the Mountain View Fire is supported by the following records:

a) Industry best practices were already clear by 2017-2019. Cal Advocates references a widely held industry consensus that high-wind HFTD circuits required targeted mitigation such as covered conductor, stronger poles, etc.[6]

b) Liberty's mitigation response was not "urgent" and the Topaz 1261 circuit remained vulnerable. Cal Advocates contends that even though these mitigations are widely held industry best practices, Liberty "failed to take critical and urgent corrective

[5] Exhibit (Ex.) Cal Advocates CA-07, at 10.

[6] Ex CA-07, at 10.

In the years leading up to the Mountain View Fire, utilities were expected to harden and modernize equipment in HFTDs, as well as adjust operational procedures to account for severe weather.

action on Topaz 1261, leaving it vulnerable to well understood ignition drivers."[7,8]

c) Liberty held no documented "interim risk controls" while hazards endured on the Topaz 1261 Circuit. Cal Advocates details Liberty maintained no records showing interim risk mitigations for Topaz 1261, even when external factors demanded heightened monitoring and proactive solutions.[9]
d) The ignition location wasn't hardened with covered conductor. The subject span conductor is identified as #4 ACSR (i.e. bare conductor, not covered conductor).[10]

**Enhanced Vegetation Management Policies**

Enhanced vegetation management policies are identified by shorter implementation cycles, more targeted hazard tree operations, and documentation that is easy to follow.[11]

Liberty's own statements on its vegetation management program shows why Cal Advocates can reasonably say Liberty did not begin implementing "enhanced" vegetation management before the Mountain View Fire:

a) Liberty acknowledges that before its specialized vegetation management policies were deployed its implementation cycle exceeded seven years. Liberty states that as of 2017 and earlier, its specialized management policies focused on annual planning (not multiple year planning), and its average miles completed equaled to a vegetation cycle "in excess of 7 years."[12,13]
b) Liberty's specialized vegetation management policies came later, after the fire. Liberty admits it was still developing specialized vegetation management policies,

[7] Ex. CA-01, at 8 – 9.

[8] Response to data request CalAdvocates-LIB-A2506017-031, question 6, October 31, 2025." While Liberty states that it had been replacing its aging infrastructure since 2011, the Topaz 1261 Circuit reconductor project did not begin construction until 2019."

[9] Response to data request CalAdvocates-LIB-A2506017-031, question 4, October 24, 2025. "Liberty is also not aware of records formally tracking interim risk controls associated with due date extensions on the Topaz 1261 Circuit in the specified time frame."

[10] Ex. Liberty-03, at 8. "The conductors on the Subject Span were #4 ACSR (Aluminum Conductor Steel Reinforced), which has a steel core surrounded by aluminum strands."

[11] Ex Liberty-03, at 12.

> Vegetation Management and Inspections. Liberty's [2019] WMP focused on its efforts to increase the frequency of vegetation management inspections, conduct detailed inspections and remediation of vegetation to support compliance with clearance requirements, reduce strike potential posed by hazard trees, remove dead and dying trees in high tree mortality areas, and manage fuels. Liberty also planned to develop a formal quality assurance program and to pilot LiDAR inspections of vegetation clearance around poles and conductors.

[12] Ex. Liberty-03, at 25.

> As of 2017 and years prior, Liberty's vegetation management program focused on annual planning, rather than long-term, multi-year planning, and the average number of miles completed each year equated to a vegetation maintenance cycle in excess of 7 years. Recognizing the need to implement improvements to further mitigate the risk of wildfires, Liberty engaged an experienced vegetation management specialist in 2017 to comprehensively review Liberty's vegetation management program and identify an optimum strategy.

[13] Ex. Liberty-03, at 25. Liberty did not implement a new three year vegetation management strategy until 2019.

and that those were "implemented in 2021."[14]

c) LiDAR inspection was executed in October 2020, just weeks before the fire. "Systemwide" LiDAR started in 2021.[15] Liberty notes that an October 2021 scan covered the entire Topaz 1261 circuit and also describes that starting in 2021 it conducts systemwide LiDAR annually.[16]

**Operational Protocols**

Liberty's testimony described protocols at a program level, however the Topaz 1261 record shows the circuit was not operated with the elevated, documented operating scheme these protocols require.

a) Liberty mentions "proactive measures under Red Flag conditions" including: "patrols for circuits in HFTD areas if wind gusts exceeded 76.5mph;" "putting reclosers on fire settings;" and "de-energizing circuits" under narrow conditions.[17]

b) At the time of the ignition, the Topaz 1261 circuit remained on a two year patrol cycle. Liberty's policy did not sufficiently address the circuit's extreme ignition risk in high speed wind.[18]

c) Liberty was not able to produce missing patrol documentation during the years leading up to the Mountain View Fire. Cal Advocates contends that Liberty could not produce the documentation showing required patrols in the critical period from 2017 to 2020 were performed, calling it a "significant departure from a reasonable practice and GO 165 requirements."[19,20]

Patrol inspections are meant to identify visible hazards that can lead to failure or wildfire ignition.[21,22] Liberty has not provided verification that the Topaz 1261 circuit was actually operated

[14] Ex. Liberty-03, FN33, at 24.
At the time, the company was also in the process of developing specialized policies for different. vegetation management functions, which were implemented in 2021. For instance, Liberty developed additional volumes focused on hazard trees, post-work verification, customer refusals, etc.

[15] Ex. Liberty-03, at 26.
Starting in 2021, Liberty replaced these wildfire mitigation-focused vegetation inspections in high fire areas with more comprehensive and efficient annual systemwide LiDAR scans, described in more detail below in Part V.D.4.

[16] Ex. Liberty-03, at 29.

[17] Ex. Liberty-03, at 11.

[18] Ex. Cal Advocates CA-07, at 11.

[19] Ex. Cal Advocates CA-07, at 12.

[20] Response to data request CalAdvocates-LIB-A2506017-015, question 4, November 1, 2025. "Liberty has not located further documentation of patrols of Topaz 1261 Circuit between November 2017 and the 2020 detailed inspection."

[21] Ex. Cal Advocates CA-07, at 12.
Patrol inspections are a fundamental safety activity required of an electric utility. Patrol inspections are intended to identify visible defects, deteriorated components, vegetation encroachments, and other readily observable hazards that, if left unaddressed, can lead to equipment failure or wildfire ignition.

[22] GO 165, Section III Distribution Facilities – Definitions. "'Patrol inspection' shall be defined as a simple visual inspection, of applicable utility equipment and structures, that is designed to identify

under weather triggered protocols in the years immediately preceding the fire (2017 – 2020).[23]

**Policy for reassessment of circuit risk (especially HFTDs)**

Risk assessment and its paper trail should demonstrate the who, what, and where of the risk in Liberty's circuits.

a) Liberty provided "no documentation of initial records review or due diligence for Topaz records were examined as part of initial risk assessment efforts when Liberty assumed control of the Topaz 1261 circuit."[24,25]
b) Liberty furnished no documentation that Liberty assessed inherited ignition risks before operating through not one but multiple wildfire seasons."[26,27]
c) Liberty had not conducted any comprehensive, systemwide reviews from 2011 until 2020 asset survey of the Topaz 1261.[28]
d) Liberty admits that from 2011 to 2020 it had not performed any "formal QA/QC review of [its] inspection data" rendering it "impossible to verify whether hazards were accurately classified or whether repairs were completed as required.[29,30]

This is the foundation of the "no reassessment policy implemented" claim. If Liberty can't show consistent risk review, confirmation, and interim controls, especially in a Tier 2 HFTD, high wind, chronically unreliable circuit, then the policy is not functioning effectively.

**Request 12**

a) State whether Cal Advocates contends that the Specific Facilities between the East Pole and West Pole, including the conductors, were non-compliant with

obvious structural problems and hazards."

[23] Response (amended) to data request CalAdvocates-LIB-A2506017-011, question 5, October 22, 2025.
Liberty's first proactive de-energization of a distribution circuit pursuant to its formal PSPS protocol was on November 11, 2024. Prior to adoption of its formal PSPS protocol and in response to fire weather conditions, Liberty proactively de-energized three lines in South Lake Tahoe on November 21, 2018 for approximately three hours, impacting 30 residential and commercial customers.

[24] Ex. Cal Advocates CA-07, at 1-2.

[25] Response (amended) to data request CalAdvocates-LIB-A2506017-015, questions 1-3, November 1, 2025.

[26] Ex. Cal Advocates CA-07, at 3.
Liberty failed to furnish documentation showing that it evaluated acquired asset conditions, confirmed past mitigations were completed, or reviewed hazard history prior to operating the circuit during multiple wildfire seasons.

[27] Response (amended) to data request CalAdvocates-LIB-A2506017-015, questions 2-3, November 1, 2025.

[28] Ex. Cal Advocates CA-07, at 3.

[29] Ex. Cal Advocates CA-07, at 21.
From 2011 to 2020, Liberty performed no formal quality assurance or quality control (QA/QC) review of inspection data, making it impossible to verify whether hazards were accurately classified or whether repairs were completed as required.

[30] Response (amended) to data request Cal Advocates-LIB-A2506017-004, question 9, October 24, 2025. "Liberty did not have a formalized program for QA/QC for asset inspections during the specified time frame."

GO 95.

b) If the answer to subpart (a) is yes, please explain in detail all aspects of the Specific Facilities that Cal Advocates contends were non-compliant with GO 95, including with specific reference to GO 95 Rules.

**Response:**

a) Yes, Cal Advocates contends that the conductors between the East and West Poles were non-compliant with GO 95.

b) Cal Advocates contends that Liberty was in violation of GO 95 Rule 38. The part of Table 2 relevant in this situation is case number 17, column F. For a detailed analysis, see Cal Advocates' exhibit CA-08 section II.

**Request 13**

State whether Cal Advocates has done any analysis of phase-to-phase or wire slap events reported by utilities other than Liberty.

**Response:**

Cal Advocates objects to this question on the basis that it is vague, ambiguous and unduly burdensome, and seeks information not relevant to the scope of this proceeding. Without waiving these objections, Cal Advocates responds as follows: Yes, Cal Advocates has done analyses of phase-to-phase or wire slap events reported by utilities other than Liberty.

**Request 14**

State whether Cal Advocates has done any analysis of wire down events reported by utilities other than Liberty.

**Response:**

Cal Advocates objects to this question on the basis that it is vague, ambiguous and unduly burdensome, and seeks information not relevant to the scope of this proceeding. Without waiving these objections, Cal Advocates responds as follows: Yes, Cal Advocates has performed analyses of wire down events reported by utilities other than Liberty.

**Request 15**

a) Provide all materials or data related to Cal Advocates' analysis of SAIDI data for the Topaz 1261 Circuit on page 5 of CA-08.

b) State whether Cal Advocates' analysis considered the cause of outages reflected in the SAIDI data and if so, explain how.

**Response:**

a) Please see Attachment 2, Attachment 5, and Attachment 6 to Cal Advocates' exhibit CA-08.

b) Cal Advocates noted that Liberty had 18 wire slap events on Topaz 1261 between 2015 and 2019. See Cal Advocates' exhibit CA-08 section II, subsection C. In addition, Cal Advocates noted that Liberty's 2020 Electric System Reliability Report (published in 2021) provides some non-construction related outages, which do not fully explain the high SAIDI on the Topaz 1261 circuit.

**Request 16**

State what additional specific actions, if any, Cal Advocates contends that Liberty should have taken in negotiating a settlement amount with the Subrogation Plaintiffs.

**Response:**

Cal Advocates objects to this question on the basis that it is vague, ambiguous, and unduly burdensome as to the meaning of "additional specific actions." Without waiving these objections, Cal Advocates responds as follows: Cal Advocates does not know what steps were actually taken, because Liberty objected to providing such information, and did not provide any description of those actions. Therefore, it is not possible for Cal Advocates to know what additional specific actions should have been taken.

# ATTACHMENT 2

# PG&E's Response to CalAdvocates-PGE-A2506017-003

# PACIFIC GAS AND ELECTRIC COMPANY
# PG&E Ref. DRU16602-Case-Cost Recovery for Mountain View Fire-A.25-06-017
# Data Request CPUC Public Advocates Office
# Requester DR No. CalAdvocates-PGE-A2506017-003

**Requester: Madison, Charles; Louie, Aaron; Huber, Patrick**
**Request Date: October 29, 2025**
**Response Date: November 13, 2025**

**Background for Questions No. 001 - 006:**

Questions 1 - 6 refer to PG&E's policies and standards involving electric distribution splice and conductor replacement in effect as of the Liberty Utilities' Mountain View Fire – November 17, 2020.

**Question No. 001:**

How many mechanical or compression splices were permitted on a single span of an overhead distribution conductor before full conductor replacement was required?

**Response to Question No. 001 Response No. 001:**

Please note that we understand Questions 1 through 6 of this request to refer to splices present on a single phase, not, for example, splices present on various phases of a span.

There was no specific threshold for the number of splices permitted on a single span of an overhead distribution conductor before full replacement was required. However, per document 022487, Rev. 10, crews are directed to, "[i]f possible, perform on the spot corrective action to eliminate three or more splices, especially for down conductor situations." Please see "*DRU16602_Q01_Atch01_022487 R10_CONF.pdf*."

**Question No. 002:**

a) Did PG&E maintain a formal policy or engineering standard specifying a maximum number of splices per span or per defined conductor length?
b) If the answer to subpart (a) is "yes," please identify and provide the version(s) of your Overhead Electric Construction Manual, Distribution Maintenance Manual, or equivalent standard that governed splice installation and conductor replacement criteria in 2020.
c) If the answer to subpart (a) is "no," please explain why not.
d) If the answer to subpart (a) is "yes," were there any conditions under which PG&E would temporarily or permanently permit the number of splices in a segment of line to exceed the specified maximum?
e) If the answer to subpart (d) is "yes," list and describe each such condition, including the rationale for permitting excess splices.
f) If the answer to part subpart (d) is no, please explain why not.

**Response to Question No. 002 Response No. 001:**

a) No, we did not maintain a formal policy or engineering standard specifying a maximum number of splices per span or per defined conductor length. Please see our response to Question No. 1 of this request.
b) N/A
c) We are not aware of any industry standard regarding the maximum number of splices per span or per defined conductor length.
d) N/A
e) N/A
f) N/A

**Question No. 003:**

a) Were there any differences in the allowable number of splices depending on conductor type (e.g., aluminum, copper, covered, bare) or voltage class?
b) If the answer to subpart (a) is "yes," list and describe the differences in allowable number of splices for each conductor type in use by PG&E in 2020.

**Response to Question No. 003 Response No. 001:**

a) No, the number of allowable splices does not vary by distribution conductor type.
b) N/A

**Question No. 004:**

a) What engineering or safety criteria did your utility use in 2020 to determine when cumulative splices on a conductor compromised mechanical integrity or electrical reliability (e.g., tension limits, fatigue, or corrosion risk)?
b) Please provide an explanation to support your answer to subpart (a).
c) Please provide copies of any standards, procedures, reports, or other formal documentation of the engineering or safety criteria in your response to subpart (a).

**Response to Question No. 004 Response No. 001:**

a) We have not specifically determined when cumulative splices on a conductor compromise mechanical integrity or electrical reliability.
b) We are not aware of any industry standard regarding when cumulative splices on a conductor compromise mechanical integrity or electrical reliability.
c) N/A

**Question No. 005:**

a) Were splices tracked through a formal asset management system or field reporting tool (e.g., SAP, GIS, or inspection database)?
b) If the answer to subpart (a) is "yes," please describe the tracking method.
c) If the answer to subpart (a) is "no," please state the basis for your decision.

**Response to Question No. 005 Response No. 001:**

a) No, splices were not and are not tracked through a formal asset management system or field reporting tool.
b) N/A
c) Splices are installed as needed in the field and are not feasibly geolocatable for a variety of reasons, including emergency work conditions, the presence of multiple phases, crossings, and frequent grid changes and repairs.

**Question No. 006:**

a) Did PG&E standards in 2020 require documentation or mapping of installed splices in field records or asset databases?
b) If the answer to subpart (a) is "yes," describe the required process.
c) If the answer to subpart (a) is "no," please state the basis for your decision.

**Response to Question No. 006 Response No. 001:**

a) No, our standards in 2020 did not require documentation or mapping of installed splices in field records or asset databases.
b) Please see our response to Question No. 5, part c.

**Background for Question No. 007:**

Question 7 is regarding PG&E's transition from paper inspection records to digital systems.

**Question No. 007:**

a) At what point in time did PG&E transition its electric distribution inspection records from paper-based documentation to a digital system (e.g., SAP, GIS, or equivalent)?
b) Please identify the primary drivers for this transition (e.g., regulatory requirements, internal asset-management initiatives, wildfire-risk considerations)
c) Describe how the transition was implemented across inspection workflows, including any phased rollouts.
d) Following the transition, what procedures or quality-assurance measures were established to verify the completeness and accuracy of legacy inspection data migrated from paper records and can PG&E demonstrate whether any gaps or losses in historical asset condition data occurred during the process?

**Response to Question No. 007 Response No. 001:**

a) PG&E transitioned its electric distribution overhead inspection records from paper-based documentation to a digital system fully at the beginning of inspection year 2020. 2019 GO165 records were on paper. PG&E performed wildfire digital inspections using a mobile device in 2019. These wildfire inspections were in addition to the GO165 inspections in 2019.

b) The drivers were a combination of the examples listed with a primary focus on wildfire-risk reduction. In addition, one reason PG&E was able to implement electronic inspections in 2020 was because of the access to cloud computing technology facilitating photo data storage.
c) After completing wildfire inspections on mobile devices with a checklist in 2019, the Inspect Ap solution was delivered and rolled out to all divisions at the beginning of 2020 for overhead inspections.
d) Data migration of pre-2020 records was not performed nor necessary. The completion of the paper records was recorded in the electronic system of record pre-2020, and the inspection records themselves stored according to PG&E records retention policy. All these records pre- and post- 2020 are subject to internal quality reviews and external audit.

# ATTACHMENT 3

# SCE's Response to CalAdvocates-SCE-A2506017-001, Question 2(b)

*Southern California Edison*
*Wildfire NDDR – Wildfire NDDR*

**DATA REQUEST SET C a l A d v o c a t e s - S C E - A 2 5 0 6 0 1 7 - 0 0 1**

**To: Cal Advocates**
**Prepared by: Marco Aceituno-Murillo**
**Job Title: PSPS Operations Senior Manager**
**Received Date: 9/8/2025**

**Response Date: 9/22/2025**

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**Question 02.b:**
SCE's November 14-18, 2020 PSPS Post-Event Report, page 9, states SCE's decision to shut off power is dynamic and was made by considering the following factors during this PSPS event…The SCE Fire Potential Index (FPI), a tool that utilizes weather data, fuel conditions, and vegetation moisture content to rate the daily fire potential across our region. SCE uses the following metrics to rate ignition potential -- Low - 11.99, Elevated - 12-14.99 and Extreme - 15 and above.

b. At the time of this PSPS event, did SCE calculate real-time FPI? If yes, explain what real-time inputs SCE used to calculate real-time FPI. If no, explain why not.

**Response to Question 02.b:**

At the time of the November 14-18, 2020 PSPS event, SCE did not calculate real-time FPI. In late 2020, SCE's operational tool did not have the capability to calculate the real-time FPI which utilizes forecasted maximum fuels score (((DL/LFM) + G) FLx) and point weather station information to calculate the real-time weather component (DPd and Ws). Refer to diagram below. Note that this capability became available with the deployment of the Integrated PSPS Management System (iPEMS) after July 2021.

Until the capability became available, the calculation of FPI and its components used forecasted values from deterministic weather models as provided by SCE's vendor Atmospheric Data Solutions (ADS) and in-house weather services personnel assessments. The variables used to generate the FPI score came from the Weather Research and Forecasting (WRF) model, which produces hourly output, twice daily for each 2 km by 2 km grid cell out to five days. The forecasts associated with each of the FPI components for each grid cell are then summarized by circuit for three-hour intervals and further refined and calibrated by internal subject matter experts. These refined FPI values are used to determine which circuits are forecast to breach PSPS thresholds during the event, and the values are recorded on SCE's monitored circuit list.

Dryness Level is a function of ERC and the 10-hour/100-hour dead fuel moisture time-lag.

Fuel loading modifier associated with low, moderate, and heavy fuel loading corresponding to 0.50, 0.75 and 1.00, respectively. This represents a measure of the amount of vegetation on the ground.

$$FPI = \left(\frac{DL}{LFM} + G\right)FLx + Wx$$

Weather component of the FPI, also known as the weather score, and references a lookup table of paired sustained wind speed and dew point depression values as in the figure below. The value range is 0 to 6.

Moisture content of the living vegetation.

Degree of green-up of the annual grass based on the NDVI.

**FPI Weather Component (Wx)**

| Dew Point Depression | Wind Speed (mph) <=5 | 6-10 | 11-16 | 17-22 | 23-28 | >=29 |
|---|---|---|---|---|---|---|
| >=50 | 2 | 3 | 3 | 4 | 5 | 6 |
| 40-49 | 2 | 2 | 3 | 3 | 4 | 5 |
| 30-39 | 1 | 2 | 2 | 3 | 3 | 4 |
| 20-29 | 1 | 1 | 2 | 2 | 3 | 3 |
| 10-19 | 0 | 0 | 1 | 1 | 1 | 1 |
| <10 | 0 | 0 | 0 | 0 | 0 | 0 |

# ATTACHMENT 4

# SCE's Response to CalAdvocates-SCE-A2506017-004, Question 4(a)

*Southern California Edison*
*Wildfire NDDR – Wildfire NDDR*

**DATA REQUEST SET C a l A d v o c a t e s - S C E - A 2 5 0 6 0 1 7 - 0 0 4**

**To: Cal Advocates**
**Prepared by: Andrew Swisher**
**Job Title: Consulting Engineer**
**Received Date: 10/29/2025**

**Response Date: 11/13/2025**

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**Question 04.a-c:**
a) What engineering or safety criteria did your utility use in 2020 to determine when cumulative splices on a conductor compromised mechanical integrity or electrical reliability (e.g., tension limits, fatigue, or corrosion risk)?
b) Please provide an explanation to support your answer to subpart (a).
c) Please provide copies of any standards, procedures, reports, or other formal documentation of the engineering or safety criteria in your response to subpart (a).

**Response to Question 04.a-c:**
SCE objects to this question as vague and ambiguous. Subject to these objections, SCE responds as follows:

a.) SCE's engineering and design criteria follow industry standards and manufacturer guidance for splice applications. SCE is not aware of unique tension limits, fatigue, or corrosion risk that would compromise conductor integrity from the cumulative application of properly installed splices in a conductor in a span. For additional details, refer to SCE's response to Question 2d of this data request set.

b.) Refer to the response to Question 4a.

c.) Refer to the response to Question 2a of this data request set.

# ATTACHMENT 5

# SCE's Response to CalAdvocates-SCE-A2506017-004, Question 6(a)

*Southern California Edison*
*Wildfire NDDR – Wildfire NDDR*

**DATA REQUEST SET C a l A d v o c a t e s - S C E - A 2 5 0 6 0 1 7 - 0 0 4**

**To: Cal Advocates**
**Prepared by: Andrew Swisher**
**Job Title: Consulting Engineer**
**Received Date: 10/29/2025**

**Response Date: 11/13/2025**

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**Question 06.a-c:**
a) Did SCE standards in 2020 require documentation or mapping of installed splices in field records or asset databases?
b) If the answer to subpart (a) is "yes," describe the required process.
c) If the answer to subpart (a) is "no," please state the basis for your decision.

**Response to Question 06.a-c:**

a.) No, in 2020, SCE's design and construction standards did not require documentation or mapping of the presence of splices in field records or asset databases, though as noted in response to Question 5 of this data request set, SCE inspection practices tracked splice installations in inspection documentation.
b.) Not applicable.
c.) Refer to the response to Question 6a.

# ATTACHMENT 6

# Liberty's Amended Response to CalAdvocates-LIB-A2506017-001

Liberty Utilities (CalPeco Electric) LLC
933 Eloise Avenue
South Lake Tahoe, CA 96150
Tel: 800-782-2506
Fax: 530-544-4811

December 9, 2025

**Liberty Utilities (CalPeco Electric) LLC**

**A.25-06-017**
**WEMA**

**The Public Advocates Office**

| | |
|---|---|
| Data Request No.: | CalAdvocates-LIB-A2506017-001 |
| Requesting Party: | Public Advocates Office |
| Originator: | Charles Madison, Charles.Madison@cpuc.ca.gov |
| | Aaron Louie, Aaron.Louie@cpuc.ca.gov |
| | Patrick Huber, Patrick.Huber@cpuc.ca.gov |
| Cc: | Matthew Karle, Matthew.Karle@cpuc.ca.gov |
| Date Received: | August 19, 2025 |
| Due Date: | September 3, 2025 |
| Extension Granted: | September 10, 2025 |
| Response Date: | September 10, 2025 |
| Amended Response Date: | December 9, 2025 |

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Attachments to these responses contain information marked confidential in accordance with applicable law and regulation. The basis for confidentiality is set forth in accompanying confidentiality declaration. Public disclosure is restricted.

**REQUEST NO. 1:**

Provide an Excel file that contains all corrective work identified in 2010-2020 by the routine or annual patrol program affecting the Topaz 1261 circuit.

Each asset work order should be in a row. The file should contain the following columns of data:

a) Structure number
b) Work Order Number



**A-029**

c) Notification Number (if applicable)
d) Equipment Number
e) Inspection Date
f) Equipment Type
g) HFTD/HFRA Tier
h) Priority
i) Ignition Risk (Y/N)
j) Date Created
k) Due Date
l) Revised Due Date (if applicable)
m) Priority Change (if applicable)
n) Reason for Change (if applicable)
o) Date Completed
p) Latitude in degrees
q) Longitude in degrees.

**AMENDED RESPONSE:**

Liberty objects to this Question as vague and ambiguous. Liberty further objects to this Question as unduly burdensome to the extent it seeks information not maintained by Liberty in the ordinary course of business. Liberty further objects to this Question to the extent it seeks information from prior to the start of Liberty's operations in approximately 2011, when it purchased the California utility system from NV Energy. Subject to and without waiving its objections, Liberty responds as follows:

As explained in *Liberty-03: Prudence of Operations*, Liberty conducted routine patrols using hard-copy circuit maps and inspectors noted any corrective work on these maps. *See* Liberty-03 at 20. After a reasonable search and diligent inquiry, Liberty located Topaz 1261 maps used for Liberty's patrols from 2013, 2015, and 2017, which were provided in response to CalAdvocates-LIB-A2306017-004, Question 2. These maps do not indicate any corrective work identified by those patrols.

**REQUEST NO. 2:**

Provide an Excel file that contains all corrective work identified in 2010 - 2020 by the detailed inspection program affecting the Topaz 1261 circuit.

Each asset work order should be in a row. The file should contain the same columns of data listed in Question 1 above.

**AMENDED RESPONSE:**

This response contains confidential attachments. Liberty objects to this Question as vague and ambiguous. Liberty further objects to this Question as unduly burdensome to the extent it seeks information not maintained by Liberty in the ordinary course of business. Liberty further objects to this Question to the extent it seeks information from prior to the start of Liberty's operations in approximately 2011, when it purchased the California utility system from NV Energy. Subject to and without waiving its objections, Liberty responds as follows:

As described in *Liberty-03: Prudence of Operations,* Liberty transitioned to Fulcrum for detailed inspection records in 2020 and has continued to refine its data collection process since that time. As also described in *Liberty-03: Prudence of Operations*, prior to 2020, inspectors recorded the results of detailed inspections on physical forms and thus, Liberty is unable to provide an Excel file with the requested information for detailed inspections prior to 2020 due to the significant burden of compiling such a file based on information contained within hard-copy records for the entire Topaz 1261 Circuit over a nearly 10-year period.

Liberty is providing information requested by this Question in *CONFIDENTIAL-CalAdvocates-LIB-A2506017-001-Q2_Amended.xlsx*, to the extent available in its Fulcrum database for detailed inspection records in 2020. This spreadsheet contains a list of inspection records from 2020 detailed inspections on the Topaz 1261 Circuit that Liberty understands to indicate corrective work identified during those inspections. Liberty identified these records by reviewing the full event history output for inspection records for the Topaz 1261 Circuit from the 2020 detailed inspections, which Liberty produced in response to Question 31 of CalAdvocates-LIB-A2506017-031 as confidential attachment *CONFIDENTIAL-CalAdvocates-LIB-A2506017-31-Q3.csv*. Liberty selected records that were updated in 2020 and that had a priority level identified as Level 1, 2, or 3. Liberty also selected records updated in 2020 where inspectors selected or filled in condition codes for issues identified during the inspection. In some instances, the spreadsheet contains multiple event history records corresponding to the same inspection at the same pole, if the record was updated multiple times in 2020. Liberty is providing the information requested in subparts (k) and (o) by producing the full event record for the most recent event history available in Fulcrum, as of October 3, 2025, for the aforementioned inspection records. Please note that Liberty did not track some of the information requested by this Question.

**REQUEST NO. 3:**

Provide an Excel file that contains all corrective work identified in 2010 - 2020 by any infrared inspection programs affecting the Topaz 1261 circuit.

Each asset work order should be in a row. The file should contain the same columns of data listed in Question 1 above.

**RESPONSE:**

Liberty objects to this Question as vague and ambiguous. Liberty further objects to this Question to the extent it seeks information from prior to the start of Liberty's operations in approximately 2011, when it purchased the California utility system from NV Energy. Subject to and without waiving its objections, Liberty responds as follows: Liberty did not have an infrared inspection program during the specified time frame.

**REQUEST NO. 4:**

Provide an Excel file that contains all corrective work identified in 2010 - 2020 by the intrusive pole inspection program affecting the Topaz 1261 circuit.

Each asset work order should be in a row. The file should contain the same columns of data listed in Question 1 above.

**RESPONSE:**

Liberty objects to this Question as vague and ambiguous. Liberty further objects to this Question as unduly burdensome to the extent it seeks information not maintained by Liberty in the ordinary course of business. Liberty further objects to this Question to the extent it seeks information from prior to the start of Liberty's operations in approximately 2011, when it purchased the California utility system from NV Energy. Subject to and without waiving its objections, Liberty responds as follows:

Please see attachment *CalAdvocates-LIB-A2506017-001-Q4_Amended.xlsx*, which contains available data related to intrusive pole inspections conducted on the Topaz 1261 Circuit in 2013, the only year between 2011 and 2020 in which such inspections were performed on this circuit. This spreadsheet contains three tabs for corrective work identified by these inspections: "Restorable" – poles that were identified for reinforcement; "Non-Restorable" – poles that were identified for replacement; and "Hazard Poles" – poles that were identified for urgent replacement. Liberty addressed corrective work using hard-copy work packets during the specified time frame. For purposes of this response, Liberty is providing in Column AK of the spreadsheet information regarding when the poles identified in the "Non-Restorable" and "Hazard Poles" tabs were replaced. Liberty identified this information using a combination of data sources, including pole replacement design packets, installation dates of poles available in its GIS database, records of pole inspections available within the Fulcrum database, and field verification.

**REQUEST NO. 5:**

a) What constituted an asset work order being "overdue," according to Liberty's policies at the time of the Mountain View Fire?

b) What were considered valid reasons for delays in remediating asset work orders, according to Liberty policies at the time of the Mountain View Fire?

**RESPONSE:**

Liberty objects to this Question as vague and ambiguous as to the term "asset work order" and "valid reasons for delays." Subject to and without waiving its objections, Liberty responds as follows:

a) Liberty understands the term "asset work order" to refer to conditions requiring corrective actions in relation to a Liberty asset. At the time of the Mountain View Fire, Liberty assigned due dates for conditions based on the regulatory requirements set forth by GO 95, Rule 18. An "overdue" condition is one that is past the due date assigned by Liberty and applicable regulatory requirements.

b) Liberty understands the phrase "valid reasons for delays" to refer to reasons by which remediation times may be extended beyond the deadlines prescribed by regulatory

requirements. Not all conditions were compliance-based issues. Those conditions not related to compliance were not subject to regulatory requirements. For compliance-based conditions, Liberty attempted to complete all remediation by the assigned due dates. For some conditions, factors beyond Liberty's control, such as permitting, customer refusal, access difficulties, and emergencies such as the Covid-19 pandemic, may cause Liberty to require additional time to complete the remediation. GO 95, Rule 18(A)(2)(b) allows such "reasonable circumstances" to justify an extension of correction times.

**REQUEST NO. 6:**

a) How did Liberty assess the wildfire risk associated with overdue asset work orders at the time of the Mountain View Fire?

b) What criteria did Liberty use to determine whether an overdue asset work order posed an immediate wildfire risk?

c) At the time of the Mountain View Fire, what role did fire risk play in determining the priority classification of conditions (with respect to asset work orders)?

**RESPONSE:**

Liberty objects to this Question as vague and ambiguous as to the term "asset work order." Subject to and without waiving its objections, Liberty responds as follows:

a) Liberty understands the term "asset work order" to refer to conditions requiring corrective actions in relation to a Liberty asset. Liberty assessed the wildfire risk associated with asset work orders by assessing whether an asset was located within the Commission's High Fire Threat District and assigning the corresponding due dates as set forth in GO 95, Rule 18. As explained in its response to Question 5 of this set of data requests, Liberty attempted to complete all compliance-based conditions by the assigned due dates.
b) - c) Please see Liberty's response to subpart (a).

**REQUEST NO. 7:**

Please provide all records of any asset maintenance notifications on the Topaz 1261 circuit that were open as of November 17, 2020. Provide a spreadsheet with a row for each notification.

Please provide the following columns of data:

a) Structure number
b) Work Order Number
c) Equipment Number
d) Inspection Date
e) Equipment Type
f) HFTD/HFRA Tier
g) Priority
h) Ignition Risk (Y/N)

i) Date Created
j) Due Date
k) Revised Due Date (if applicable)
l) Priority Change (if applicable).
m) Reason for Change (if applicable)
n) Date Completed
o) Latitude in degrees
p) Longitude in degrees

**AMENDED RESPONSE:**

This response contains confidential attachments. Liberty objects to this Question as vague and ambiguous. Liberty further objects to this Question as unduly burdensome to the extent it seeks information not kept in the ordinary course of business. Subject to and without waiving its objections, Liberty responds as follows:

Liberty understands this Question to be asking for conditions that were identified on or before November 17, 2020, and not yet remediated as of November 17, 2020. As described in *Liberty-03: Prudence of Operations,* Liberty transitioned to Fulcrum for detailed inspection records in 2020 and has continued to refine its data collection process since that time. Prior to 2020, inspectors recorded the results of inspections, including corrective work identified, on hard-copy maps and forms and thus, Liberty is unable to provide an Excel file with the requested information for asset maintenance notifications identified during inspections prior to 2020 due to the significant burden involved with compiling such a file based on identifying, collecting, and reviewing hard-copy records for the entire circuit.

Please refer to *CONFIDENTIAL-CalAdvocates-LIB-A2506017-001-Q2_Amended.xlsx* and Liberty's response to Question 2 of this set of data requests. The spreadsheet *CONFIDENTIAL-CalAdvocates-LIB-A2506017-001-Q2_Amended.xlsx* contains a list of inspection records from 2020 detailed inspections on the Topaz 1261 Circuit that Liberty understands to indicate corrective work identified during those inspections, whether or not the corrective work was addressed prior to or after November 17, 2020.

**REQUEST NO. 8:**

In the ten years prior to the Mountain View Fire (2010 - 2020), were any splices installed on the conductor on the Topaz 1261 16kV circuit? If so, provide an Excel spreadsheet with the following information for each splice installed:

a) Date the splice was determined to be necessary.
b) Structure number at the upstream end of the span where the splice was installed.
c) Structure number at the downstream end of the span where the splice was installed.
d) Method(s) used to identify the need for a splice.
e) Work order number used to install splice.
f) Date work order was created.
g) Date work order was completed.

**AMENDED RESPONSE:**

Liberty objects to this Question as overly burdensome to the extent it seeks records and information not kept in the ordinary course of business. Liberty further objects to this Question to the extent it seeks information from prior to the start of Liberty's operations in approximately 2011, when it purchased the California utility system from NV Energy. Subject to and without waiving its objections, Liberty responds as follows:

Liberty installed splices on the Topaz 1261 Circuit as needed in connection with operation of the distribution system. As referenced in *Liberty-02: Ignition*, splices were present on the lines in the Subject Span. *See* Liberty-02 at 7. After a reasonable search and diligent inquiry, Liberty has not located records containing the detailed information regarding splices requested by subparts (a)-(g). Although Liberty did not typically document installation of splices on its system as a matter of course, Liberty documented the general location and number of splices on the Topaz 1261 Circuit as part of the 2020 asset survey. Liberty is producing a spreadsheet of select fields from 2020 inspection records of the Topaz 1261 Circuit from Fulcrum, with information regarding the location and number of splices, to the extent available. See attachment *CalAdvocates-LIB-A2506017-001-Q8.xlsx*. Columns (a)-(f) in this spreadsheet contain basic information from each inspection record, including pole number, inspection date, and latitude/longitude. Columns (g) and (h) contain information regarding whether splices were present and, if so, the number of splices present. Liberty understands that it was the practice of some inspectors to input the number of splices on the upstream span (source-side) for an associated pole. Please also refer to 2020 asset survey records Liberty previously provided in response to CalAdvocates-LIB-A2506017-004, Question 2.

**REQUEST NO. 9:**

In the ten year period leading up to the Mountain View Fire (2010 - 2020), was the Topaz 1261 circuit reviewed under Liberty's circuit reliability program?

a) Provide a list of any recommendations that resulted from any reviews in the 10 year period leading up to the Mountain View Fire.
b) Under the program's risk assessment process, what was the Topaz 1261 circuit ranked?
c) Was the Topaz 1261 circuit's rank determined by an overall average circuit score?
d) Were there any circuit segments of the Topaz 1261 circuit that scored high enough to warrant an urgent replacement?
e) If the answer to (d) is "yes", provide a list of the relevant circuit segments (i.e. structure numbers at each end).

**AMENDED RESPONSE:**

Liberty objects to this Question to the extent it seeks information from prior to the start of Liberty's operations in approximately 2011, when it purchased the California utility system from NV Energy. Liberty further objects to the phrase "any recommendations that resulted from any reviews" in subpart (a) as vague, ambiguous and overbroad. Subject to and without waiving its objections, Liberty responds as follows:

a) Consistent with D.16-01-008, Liberty reviewed the reliability of its electric system on an annual basis, including the Topaz 1261 Circuit. Liberty's reliability reports are publicly

available on the Commission's website at: https://www.cpuc.ca.gov/industries-and-topics/electrical-energy/infrastructure/electric-reliability/electric-system-reliability-annual-reports. Liberty's reliability reports identified the Topaz 1261 as a circuit that experienced more frequent outages. As a result of these findings and because the Topaz 1261 Circuit is exposed to harsh weather conditions, Liberty prioritized this circuit for system hardening. As explained in SCE-03: Prudence of Operations (pp. 17-18), the Topaz 1261 Rebuild Project was a Commission-approved multiyear project designed to improve circuit reliability and mitigate wildfire risk on Liberty's portion of the Topaz 1261 Circuit. As of November 17, 2020, Liberty was in the process of implementing phase five of the project.

b) See Liberty's response to subpart (a).
c) See Liberty's response to subpart (a).
d) See Liberty's response to subpart (a).
e) See Liberty's response to subpart (a).

**REQUEST NO. 10:**

Provide an Excel spreadsheet listing all ignitions in 2010 through 2020 on the Topaz 1261 Circuit.

Each ignition should be a row. Provide the following data as columns:

a) Ignition date
b) Ignition time
c) Latitude of ignition
d) Longitude of ignition
e) Number of nearest pole
f) Acres burned
g) Cause, if identified
h) Whether the ignition was a CPUC-reportable incident (Y/N)
i) Whether Liberty had any asset corrective notifications at the ignition location, that were open at the time of the ignition (Y/N)
j) Whether the ignition was linked to an asset corrective notification that existed at the time (Y/N)
k) ID number of the nearest protective device upstream of the ignition
l) Longitude in degrees of the device identified in part (k)
m) Latitude in degrees of the device identified in part (k)
n) Whether the device identified in part (k) tripped

**AMENDED RESPONSE:**

Liberty objects to this Question as overly burdensome to the extent it seeks records and information not kept in the ordinary course of business. Liberty further objects to this Question to the extent it seeks information from prior to the start of Liberty's operations in approximately 2011, when it purchased the California utility system from NV Energy. Subject to and without waiving these objections, Liberty responds as follows:

Liberty is not subject to ignition reporting under D.14-02-015. From the start of Liberty's operations in approximately 2011 to 2020, Liberty has identified one ignition associated with the Topaz 1261 Circuit prior to November 17, 2020. Liberty is providing the information requested by this Question to the extent available in its records in attachment *CalAdvocates-LIB-A2506017-001-Q10.xlsx*. Liberty is providing information requested in (a)-(g) using information available in its database of ignitions. Liberty's database of ignitions does not track the information requested in (k)-(m) and Liberty is providing this information based on its knowledge of the location of its protective devices and comparing it to the ignition location. With respect to subpart (k), Liberty is providing a general description of the type of protective device as it did not track the device ID number in its database of ignitions. Please note that Liberty is unable to provide the information requested in (h) because Liberty is not subject to ignition reporting under D.14-02-015 as noted above and in (i)-(j) because Liberty is not aware of records formally tracking ignition events in relation to corrective work, which was tracked through hard-copy records prior to 2020. As explained in *Libery-03: Prudence of Operations* (at pp. 32-33), Liberty's system was operated by NV Energy's system control center for a portion of the time period requested in this Question and Liberty's records for the information requested in subpart (n) in its Outage Management System (OMS) date back to approximately 2016.

**REQUEST NO. 11:**

Provide an Excel spreadsheet listing all wire-down events in 2010 through 2020 on the Topaz 1261 circuit. Each wire-down event should be a row. Provide the following data as columns:

a) Date of wire-down event
b) Time of wire-down event
c) Latitude of wire-down event
d) Longitude of wire-down event
e) Number of nearest pole
f) Cause, if identified
g) Whether Liberty had any asset corrective notifications at the location, that were open at the time of the wire-down event (Y/N)
h) Whether the wire-down event was linked to an asset corrective notification that existed at the time (Y/N)
i) ID number of the nearest protective device upstream of the wire-down event
j) Longitude in degrees of the device identified in part (i)
k) Latitude in degrees of the device identified in part (i)
l) Whether the device identified in part (i) tripped

**AMENDED RESPONSE:**

Liberty objects to this Question as overly burdensome to the extent it seeks records and information not kept in the ordinary course of business. Liberty further objects to this Question to the extent it seeks information from prior to the start of Liberty's operations in approximately 2011, when it purchased the California utility system from NV Energy. Subject to and without waiving these objections, Liberty responds as follows: Please see *CalAdvocates-LIB-A2506017-001-Q11_Amended.xlsx*, which contains available information in Liberty's possession regarding reported wire down events between 2011-2020. Liberty identified these events by reviewing its historical outage data dating back to 2011 and querying its outage management system (OMS)

data (which goes back to approximately 2016) for wire down events and reviewing comments and resolution to determine if a valid wire down condition existed. As explained in *Libery-03: Prudence of Operations* (at pp. 32-33), Liberty's system was operated by NV Energy's system control center for a portion of the time period requested in this Question.

Please note that Liberty is unable to provide the information requested in (g)-(h) of this Question because it is not aware of records formally tracking wire-down events in relation to asset corrective work, which were tracked through hard-copy records prior to 2020. Please also note that for some wire down events, Liberty is unable to provide the information requested in subparts (d)-(e) and (i)-(l) because Liberty's historical outage data did not track such information. For events identified from Liberty's OMS, Liberty is producing the information requested in subparts (c)-(d) and (j)-(k) in the projected coordinate system format (NAD_1983_UTM_Zone_11N) as maintained in its GIS. The unit used in the projected coordinate system format (NAD_1983_UTM_Zone_11N) in Liberty's GIS system is U.S. survey feet.

**REQUEST NO. 12:**

Please provide an Excel spreadsheet listing each outage that occurred from 2010 - 2020 on the Topaz 1261 circuit (or any portion of the Topaz 1261 circuit). The spreadsheet should list each outage in a row, with the following column headings:

a) Circuit segment ID #
b) Date of outage
c) Start time of outage
d) Cause of outage
e) For outages due to equipment failures, please state the specific type of equipment that failed. (for example: transformer failure, conductor failure, splice failure, etc.)
f) Outage duration in minutes
g) The type of protective device that tripped
h) The equipment number of the protective device that tripped
i) Latitude in degrees of the protective device that tripped
j) Longitude in degrees of the protective device that tripped

**AMENDED RESPONSE:**

Liberty objects to this Question as overbroad to the extent that it seeks information prior to the start of its operation in approximately 2011, when it purchased the utility system from NV Energy. Subject to and without waiving these objections, Liberty responds as follows: Please see *CalAdvocates-LIB-A2506017-001-Q12_Amended.xlsx*, which contains the available outage information in Liberty's possession between 2011-2020. This spreadsheet contains information from Liberty historical outage data dating back to 2011 and its outage management system (OMS) data (which goes back to approximately 2016). As explained in *Libery-03: Prudence of Operations* (pp. 32-33), Liberty's system was operated by NV Energy's system control center for a portion of the time period requested in this Question. Please note that Liberty is unable to provide the information requested in subpart (a) of this Question because Liberty's OMS system did not have a field to track circuit segment IDs. Please also note that for certain outages, Liberty is unable to provide the information requested in subparts (f)-(j) because Liberty's

historical outage data did not track such information. For events identified from Liberty's OMS, Liberty is producing the information requested in subparts (i)-(j) in the projected coordinate system format (NAD_1983_UTM_Zone_11N) as maintained in its GIS. The unit used in the projected coordinate system format (NAD_1983_UTM_Zone_11N) in Liberty's GIS system is U.S. survey feet.

**REQUEST NO. 13:**

Provide a complete list of all wildfire risk mitigation measures Liberty developed or implemented between 2010 and November 2020.

a) Among the identified wildfire risk mitigation measures, which ones were proactive (that is, not implemented in response to specific, prior safety failures)?
b) How did Liberty determine the necessity and priority of the proactive wildfire risk mitigation measures identified in your response to part (a)?
c) What criteria or guidelines did Liberty follow in developing and implementing wildfire risk mitigation measures during the specified period?

**RESPONSE:**

Liberty objects to this Question as vague, ambiguous, and overbroad as framed. Liberty further objects to the extent that this Question seeks information prior to the start of its operation in approximately 2011, when it purchased the utility system from NV Energy. Liberty further objects to the term "proactive" in subparts (a) and (b). Wildfire mitigation measures are generally based on a utility's specific risk profile and past experience and are intended to proactively mitigate future wildfire risk. Distinguishing between measures that are "proactive" and those "in response to specific, prior safety failures" is not possible. Subject to and without waiving its objections, Liberty responds as follows:

Please refer to attachments *Fire Prevention Plan for Overhead Electric Facilities (2012).pdf*, *Wildfire Mitigation Plan (2019).pdf*, *Revised 2020 Wildfire Mitigation Plan.pdf*, and *2021 Wildfire Mitigation Plan Update (Public Version).pdf*. for detailed information regarding Liberty's wildfire mitigation efforts during the specified time frame. Although Liberty had not experienced a large wildfire attributed to its electrical infrastructure since taking over from Sierra Pacific in 2011, Liberty recognized the risk of wildfires within its service area and took steps to mitigate that risk. Liberty's opening testimony described wildfire risk mitigation measures that Liberty had adopted or was in the process of developing as of November 2020 (*see, e.g.*, Liberty-03 at 10-13), including:

- Patrols of circuits in high-fire areas during high wind conditions
- Implementing "fire settings" for reclosers
- Pausing discretionary maintenance and vegetation management activities during fire threat conditions
- Conducting a detailed system-wide asset survey
- Piloting a LiDAR inspection of its distribution system for vegetation clearance
- Installing covered conductor, including on the Topaz 1261 Circuit
- Undergrounding certain lines
- Installing larger size conductors

- Replacing and upgrading distribution poles
- Replacing expulsion fuses
- Deploying monitoring sensors and SCADA-enabled devices
- Installing weather stations to support situational awareness
- Developing a Fire Potential Index (FPI) to forecast wildfire risk
- Implementing a Public Safety Power Shutoff (PSPS) program
- Increasing the frequency of vegetation management inspections
- Removing dead and dying trees in high tree mortality areas
- Hiring additional personnel to manage emergency response activities

# ATTACHMENT 7

# Liberty's Amended Response to CalAdvocates-LIB-A2506017-005

Liberty Utilities (CalPeco Electric) LLC
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December 10, 2025

**Liberty Utilities (CalPeco Electric) LLC**

**A.25-06-017**
**WEMA**

**The Public Advocates Office**

| | |
|---|---|
| Data Request No.: | CalAdvocates-LIB-A2506017-005 |
| Requesting Party: | Public Advocates Office |
| Originator: | Aaron Louie, Aaron.Louie@cpuc.ca.gov |
| | Patrick Huber, Patrick.Huber@cpuc.ca.gov |
| Cc: | Matthew Karle, Matthew.Karle@cpuc.ca.gov |
| Date Received: | August 20, 2025 |
| Due Date: | September 4, 2025 |
| Response Date: | September 4, 2025 |
| Amended Response Date: | December 10, 2025 |

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Attachments to these responses contain information marked confidential in accordance with applicable law and regulation. The basis for confidentiality is set forth in accompanying confidentiality declaration. Public disclosure is restricted.

**REQUEST NO. 1:**

Please list all 2020 vegetation inspections that Liberty performed in the area where the Mountain View Fire ignited. For each inspection, list the date of the inspection, the type of inspection (e.g., pre-inspection or post-work verification), and the number of inspection personnel.

a) Provide copies of all vegetation inspection reports for the inspections identified.

**AMENDED RESPONSE:**

This response contains confidential attachments. Liberty objects to this Question as vague and ambiguous as to the phrase "the area where the Mountain View Fire ignited." Liberty

understands this Question to be asking about vegetation management in the area of the Subject Span (the span between Pole 266731 ("West Pole") and Pole 40288 ("East Pole")) as described in *Liberty-03: Prudence of Operations*. Subject to and without waiving its objections, Liberty responds as follows:

Liberty's records indicate that a LiDAR vegetation inspection of the Subject Span was completed on October 3, 2020. The LiDAR data showed that the Subject Span was "clear," meaning no vegetation was detected within 12 feet of the conductors. Because LiDAR is a remote sensing tool, there is no specific number of inspection personnel associated with this inspection.

Liberty's records also indicate that pole clearing inspection and clearing work pursuant to Public Resources Code ("PRC") § 4292 was performed at the West Pole and East Pole on September 23, 2020. There is one inspector associated with each of these inspections. Please note that the East Pole was erroneously listed as pole number 34334 in Liberty's pole clearing records.

a) Please refer to confidential attachment *CONFIDENTIAL-CalAdvocates-LIB-A2506017-005-Q1_Amended.xlsx*, which has a tab corresponding to each type of vegetation management inspection in 2020 (LiDAR and pole clearing).

**REQUEST NO. 2:**

Please provide all records of any vegetation management notifications or work orders on the Topaz 1261 circuit that were open as of November 17, 2020.

**AMENDED RESPONSE:**

This response contains confidential attachments. Liberty understands this Question to be asking about vegetation management-related notifications that were created on or before November 17, 2020, and remained open as of November 17, 2020. Please refer to confidential attachment *CONFIDENTIAL-CalAdvocates-LIB-A2506017-005-Q2.xlsx*. There were 14 vegetation management notifications or work orders on the Topaz 1261 Circuit that were open as of November 17, 2020, one of which was completed on November 17, 2020. None of the work orders were in the area of the Subject Span (the span between Pole 266731 ("West Pole") and Pole 40288 ("East Pole").

**REQUEST NO. 3:**

Regarding Liberty's vegetation management processes for distribution circuits at the time of the 2020 Mountain View Fire:

a) Explain how Liberty's vegetation management inspection programs assessed the clearance distances for individual trees.

b) Explain how Liberty's vegetation management inspection programs determined sufficient clearance to mitigate potential impacts of tree failure.

c) Identify what programs/initiatives Liberty had in place to track specific hazardous trees (e.g., hazard tree management program; dead and dying tree program).

d) Explain how Liberty's vegetation management inspection programs determined which

trees should be tracked in each program.

e) Explain how Liberty's vegetation management inspection programs determined when to trim/remove trees.

**RESPONSE:**

Liberty objects to this Question as vague and ambiguous as to the term "hazardous trees." Liberty understands this Question to be asking about trees identified through Liberty's vegetation management inspections as posing a grow-in or fall-in risk to Liberty's overhead electric facilities. Subject to and without waiving its objections, Liberty responds as follows:

a) As of November 17, 2020, Liberty used a combination of LiDAR vegetation inspections and visual inspections performed by ISA Certified Arborists to assess the clearance distances for individual trees.

b) Liberty followed the regulatory standards established by Public Resources Code § 4293 and General Order 95, Rule 35 to determine sufficient clearance to mitigate potential impacts of tree failure. As explained in *Liberty-03: Prudence of Operations*, Liberty used a 1.5x safety factor for LiDAR vegetation inspections and generated work orders where the LiDAR data indicated vegetation clearances of six feet or less on the Topaz 1261 Circuit. *See* Liberty-03 at 29. The visual inspections performed by ISA Certified Arborists during routine vegetation management inspections were generally a Level 2: Basic Assessment per ANSI A300 (Part 9) Tree Risk Assessment, during which inspectors considered the movement of conductors and vegetation and the interrelationships between growth rates, control methods, and inspection frequency to assess whether remediation was needed. *See* id. at 24-25.

c) Liberty had several programs to identify and address hazard trees, as described in *Liberty-03: Prudence of Operations*. Liberty's routine vegetation management program tracked trees requiring mitigation using unique identification numbers, which were used to generate and track work orders. Liberty also performed off-cycle tree work as part of its Vegetation Management Plan. Liberty also had a Dead and Dying Tree Program to address tree mortality in the region and performed LiDAR inspections to assess vegetation to conductor clearances.

d) Please refer to pages 11-20 of the attachment *Vegetation Management Plan_V2018.pdf*.

e) Please refer to pages 11-20 of the attachment *Vegetation Management Plan_V2018.pdf* and pages 5-8 of the attachment *Schedule A - Pre-inspection Scope of Work.pdf.*

**REQUEST NO. 4:**

Regarding Liberty's vegetation management practices, specifically on the Topaz 1261 circuit, at the time of the 2020 Mountain View Fire:

a) What vegetation clearance distances did Liberty apply on the Topaz 1261 circuit during 2020?

b) Did the vegetation clearance distances vary geographically (i.e., different clearances applied to different parts of the circuit)?

c) If so, please describe how Liberty determined clearance distances at the time.

d) Please explain your responses to questions 4.a) and 4.b).

**RESPONSE:**

a) Liberty applied vegetation clearance distances established in Public Resources Code §§ 4292 and 4293 and General Order 95, Rule 35 Case 14 and Appendix E. Please refer to pages 5-11 of the attachment *Vegetation Management Plan_V2018.pdf*.

b) Vegetation clearance requirements did not vary along the Topaz 1261 Circuit.

c) N/A

d) Please see attachment *Vegetation Management Plan_V2018*.pdf for additional details regarding Liberty's vegetation management program.

**REQUEST NO. 5:**

At the time of the Mountain View Fire, did Liberty have a standard or procedure that required QA/QC audits to be conducted within a specific time period after vegetation management work is completed?

a) If so, please provide a copy of the standard or procedure.

b) If not, please explain why.

**RESPONSE:**

As of November 17, 2020, Liberty's Vegetation Management Plan had a Quality Control procedure that prescribed quality control audits of vegetation management activities. Quality control audits were generally conducted within the calendar year in which the work was completed, though the Quality Control procedure did not prescribe a specific time period.

a) Please refer to page 21 of the attachment Vegetation Management Plan_V2018.pdf.

b) N/A

**REQUEST NO. 6:**

The following questions pertain to vegetation management (VM) QA/QC programs.

a) At the time of the Mountain View Fire, did Liberty have a QA/QC program for VM contractors?
   i. If so, provide the date when Liberty established its QA/QC program for VM contractors.

ii. If so, explain the method Liberty used to select and define its QA/QC metrics for VM contractors.

iii. If so, provide the standard or procedure that defined Liberty's QA/QC program for VM contactors as of November 17, 2020.

b) Provide the standard or procedure that defines Liberty's current QA/QC program for VM contractors.

c) As of November 2020, describe the best industry practices regarding QA/QC for VM and provide references to specific sources or standards if possible.

**AMENDED RESPONSE:**

This response contains confidential attachments.

a) As of November 17, 2020, Liberty performed quality control audits of completed work performed by VM contractors.

i. The Vegetation Management Plan, which included a Quality Control procedure, was established in 2018.

ii. Please refer to page 21 of the attachment *Vegetation Management Plan_V2018.pdf* and pages 6-10 of confidential attachment *CONF-Liberty Utilities Pole Clearing and Tree Work Audit Report - 2020 FINAL.pdf*.

iii. Please refer to page 21 of the attachment *Vegetation Management Plan_V2018.pdf*.

b) The procedure that defines Liberty's current QA/QC program for VM contractors is Post Work Verification Procedure (VM-04). Please refer to confidential attachment *CONFIDENTIAL-VM-04_Post_Work_Verification_2.0.pdf.*

c) Liberty is not aware of specific standards establishing industry best practices regarding QA/QC for vegetation management as of November 2020.

**REQUEST NO. 7:**

As of November 2020:

a) Did Liberty provide specific criteria to contractors to use during post-routine QA/QC audits to assess the quality of routine vegetation maintenance work?

i. If so, identify the specific criteria given to contractors to assess the quality of routine vegetation maintenance work.

ii. If not, explain why.

b) Did Liberty ensure the quality and accuracy of the pre-inspection process with QA/QC

audits (as opposed to the tree trimming and removal work)?

c) If so, describe the pre-inspection audit process, including how often audits were conducted, who conducted them, and what metrics or standards were used.

d) If not, explain why.

**AMENDED RESPONSE:**

This response contains confidential attachments.

a) Yes, please refer to page 21 of attachment *Vegetation Management Plan_V2018.pdf* and to pages 6-10 of confidential attachment *CONF-Liberty Utilities Pole Clearing and Tree Work Audit Report - 2020 FINAL.pdf.*

b) Audits of the pre-inspection process were performed by the pre-inspection contract supervisor as well as Liberty's internal arborists. Audits were conducted to verify contracted employees' work to ensure quality and conformance with Liberty's Vegetation Management Plan and applicable State regulations. These audits were conducted as needed by the pre-inspection supervisor and Liberty performed audits of 100% of the pre-inspection process conducted on all state and federal lands.

c) Please see Liberty's response to Question 7, subpart (b) of this set of data requests.

d) N/A

**REQUEST NO. 8:**

At the time of the Mountain View Fire, did Liberty periodically review or revise its QA/QC processes for routine vegetation maintenance?

a) If so, describe these changes.

b) If so, how frequently did Liberty review and revise its QA/QC processes?

c) If not, explain why.

d) Have there been any changes or updates to Liberty's QA/QC processes for routine vegetation maintenance since the Mountain View Fire?

e) If so, describe these changes.

f) If not, explain why.

**AMENDED RESPONSE:**

This response contains confidential attachments.

a) As of November 17, 2020, Liberty was refining its process for conducting quality control

audits of the pre-inspection process and post work verification.

b) Liberty reviews its QA/QC processes annually and makes revisions as needed.

c) N/A

d) Liberty finalized its formal Post Work Verification Procedure (VM-04) on May 21, 2021, and VM-04 was subsequently revised on February 28, 2025. For additional information, including the revision history, please refer to confidential attachment *CONFIDENTIAL-VM-04_Post_Work_Verification_2.0.pdf*.

e) Please see Liberty's response to subpart (d).

f) N/A

**REQUEST NO. 9:**

As of November 2020:

a) Did Liberty have QA/QC criteria to determine whether scientific sampling or physical patrols will be conducted?

b) If so, provide the criteria used to determine whether scientific sampling or physical patrols should be conducted.

c) If not, explain why.

d) Describe the methodology used by Liberty to perform scientific sampling.

e) Did Liberty incorporate feedback and findings from QA/QC, inspection, or audit activities into continuous improvement efforts for vegetation management?

f) If so, explain how Liberty incorporated feedback and finding into its vegetation management continuous improvement efforts.

g) If so, provide examples of improvements made as a result of QA/QC audits or inspections.

**RESPONSE:**

a) As of November 2020, Liberty's Vegetation Management Plan included a 15% random audit of contractor work, which functioned as a basic sampling methodology to assess compliance and performance.

b) N/A

c) At the time, Liberty was in the process of developing a more formalized QA/QC framework. The then-existing approach relied on random sampling and field audits

conducted by internal staff and contractor supervisors, but did not yet incorporate statistically validated sampling protocols or decision criteria for choosing between sampling and patrols.

d) A formal scientific sampling methodology was implemented as part of the Post Work Verification Procedure (VM-04) in May 2021. VM-04 incorporated a sampling approach with defined sample sizes for different work types. Sampling was designed to achieve a 99% confidence level with a 5–7% margin of error.
e) Yes. Liberty used findings from QA/QC audits and inspections to inform updates to its vegetation management practices and oversight procedures. Feedback from audits was used to identify performance deficiencies, which were communicated to contractors for remediation. Liberty also used audit results to refine its work specifications, improve contractor training, and enhance data accuracy in its vegetation management database.

f) Please refer to Liberty's response to subpart (e).

g) Liberty implemented several improvements based on audit and inspection results. Examples of these improvements include:
    - Updated work scopes and specifications for inspections, tree work, and pole clearing
    - Monthly meetings with contractors to review audit results and discuss findings
    - Enhanced documentation standards to clarify expectations for vegetation management activities and reduce ambiguity
    - Identified training opportunities for pre-inspection arborists
    - Developed VM-04 to refine the procedure for post work verification and compliance audits
    - Improve contractor accountability and data quality through enhanced oversight and training

# ATTACHMENT 8

# Liberty's Amended Response to CalAdvocates-LIB-A2506017-006

Liberty Utilities (CalPeco Electric) LLC
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Fax: 530-544-4811

November 20, 2025

**Liberty Utilities (CalPeco Electric) LLC**

**A.25-06-017**
**WEMA**

**The Public Advocates Office**

| | |
|---|---|
| Data Request No.: | CalAdvocates-LIB-A2506017-006 |
| Requesting Party: | Public Advocates Office |
| Originator: | Herman Eng, Herman.Eng@cpuc.ca.gov |
| cc: | Aaron Louie, Aaron.Louie@cpuc.ca.gov |
| | Patrick Huber, Patrick.Huber@cpuc.ca.gov |
| Date Received: | August 21, 2025 |
| Due Date: | September 5, 2025 |
| Response Date: | September 5, 2025 |
| Amended Response Date: | November 20, 2025 |

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**REQUEST NO. 1:**

Please provide a GIS file geodatabase (.gdb) with spatial data for the following:

(a) Line feature layer for Liberty's distribution circuits for November 17, 2020, including the Topaz 1261 circuit with attribute information as requested in Wildfire Mitigation Plan data guidelines (such as circuit name);

(b) Line feature layer for Liberty's transmission circuits; and

(c) Polygon feature layer for National Weather Service (NWS) zones overlapping Liberty's service territory for November 17, 2020.

**RESPONSE:**

Please refer to attachment *CalAdvocates-LIB-A250617-006-Q1.zip* for data requested in subparts (a)-(c).

**REQUEST NO. 2:**

Please provide the latitude and longitude coordinates (in decimal degrees to at least 5 decimal places) for the following:

(a) West Pole (Pole 266731) at the origin area;

(b) East Pole (Pole 40288) at the origin area; and

(c) Topaz 1261 R2 recloser.

**RESPONSE:**

Liberty understands the term "origin area" to refer to the area where the Mountain View Fire ignited on November 17, 2020 as described in *Liberty-02: Ignition* and *Liberty-03: Prudence of Operations*.

(a) West Pole (Pole 266731): 38.513000, -119.467520

(b) East Pole (Pole 40288): 38.512970, -119.466580

(c) Topaz 1261 R2 Recloser: 38.540520, -119.497830

**REQUEST NO. 3:**

Please provide an Excel file that identifies each Liberty weather station as of November 17, 2020, including the six on the Topaz circuit area as described in *Liberty-03 - Prudence of Operations*, with the following information:

a) Unique ID number or identifier;

b) Name;

c) Latitude (in decimal degrees to 5 decimal places);

d) Longitude (in decimal degrees to 5 decimal places);

e) Installation date;

f) Last inspection date;

g) Last maintenance date;

h) Year of removal (for any weather stations that were eventually removed);

i) The types of data the weather station collected (e.g., wind speed, humidity);

j) How often the weather station collected data;

k) Whether Liberty had a means to receive data automatically or whether the data required a manual pull;

l) Whether the weather station was successfully communicating data as of November 17, 2020;

m) If the weather station was not successfully communicating data, explain why;

n) Which circuit(s) did Liberty use that weather station's data for; and

o) Whether Liberty used the weather station to monitor conditions for Liberty's PSPS

events prior to November 17, 2020.

**AMENDED RESPONSE:**

Liberty objects to this Question as vague and ambiguous as to subpart (o). Subject to and without waiving these objections, Liberty responds as follows: Liberty understands subpart (o) as asking whether Liberty used data from the weather stations to inform its PSPS decision-making, as of November 17, 2020. Data from Liberty's weather stations were used generally by Liberty's fire science and risk modeling consultant to validate Liberty's PSPS predictive tool through monitoring and comparison of weather forecast models with observed conditions. In the event of a PSPS activation, live weather station observations, along with data from field observers, would guide the ultimate decision to de-energize. For information requested in subparts (a)-(n), please refer to attachment *CalAdvocates-LIB-A2506017-006-Q3_Amended.xlsx*, which Liberty previously provided in its response to CalAdvocates-LIB-A2506017-014, Question 1.

**REQUEST NO. 4:**

Please provide an Excel file that lists all Red Flag Warning (RFW) notifications from 2016-2020 that affected the Topaz 1261 circuit. Each event should be a row. The file should have the following columns:

(a) NWS forecast zone;

(b) RFW Start Date and Time;

(c) RFW End Date and Time;

(d) Total Duration (in minutes);

(e) Name or Identifier of the nearest wind measurement station to the West or East Poles;
- West Pole (Pole 266731): 38.513000, -119.467520
- East Pole (Pole 40288): 38.512970, -119.466580

(f) Latitude (in decimal degrees to 5 decimal places) of this nearest wind measurement station;

(g) Longitude (in decimal degrees to 5 decimal places) of this nearest wind measurement station;

(h) Maximum sustained wind speed recorded at this wind measurement station; and

(i) Maximum gust wind speed recorded at this wind measurement station.

**RESPONSE:**

Liberty objects to this Question as overbroad and burdensome to the extent it seeks information not maintained in the ordinary course of business. Subject to and without waiving these objections, Liberty responds as follows:

For information requested in subparts (a)-(i), please refer to attachment *TZP_2016_2020_RFW Data.xlsx*. The nearest weather station that recorded data for the entire time period requested by this Question is Walker RAWS station. Liberty is thus providing data requested in subparts (h) and (i) from this station. As indicated in the attachment *CalAdvocates-LIB-A2506017-006-Q3.xlsx*, the Liberty weather stations nearest to the West and East Poles went into service on May 31, 2019 (LIB-3106/LIB06) and October 20, 2020 (LIB-3130/LIB26) and do not have data for the whole time period requested. Data from all three weather stations are publicly available via MesoWest: https://mesowest.utah.edu/. Data from the two Liberty weather stations are also publicly available from Western Weather Group: https://liberty.westernweathergroup.com/search.

# ATTACHMENT 9

# Liberty's Amended Response to CalAdvocates-LIB-A2506017-008

Liberty Utilities (CalPeco Electric) LLC
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December 3, 2025

**Liberty Utilities (CalPeco Electric) LLC**

**A.25-06-017**
**WEMA**

**The Public Advocates Office**

| | |
|---|---|
| Data Request No.: | CalAdvocates-LIB-A2506017-008 |
| Requesting Party: | Public Advocates Office |
| Originator: | Herman Eng, Herman.Eng@cpuc.ca.gov |
| cc: | Aaron Louie, Aaron.Louie@cpuc.ca.gov |
| | Patrick Huber, Patrick.Huber@cpuc.ca.gov |
| Date Received: | August 21, 2025 |
| Due Date: | September 5, 2025 |
| Response Date: | September 5, 2025 |
| Amended Response Date: | December 3, 2025 |

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**REQUEST NO. 1:**

Please list all external or third-party sources of wind and weather information that Liberty used for situational awareness and to inform its operations (e.g., Public Safety Power Shutoff (PSPS)) as of November 17, 2020.

**AMENDED RESPONSE:**

As of November 17, 2020, Liberty had a range of open-source and publicly available weather forecasting tools and models to support situational awareness and inform operational decisions, through its third-party fire science and risk modeling consultant. These sources included:

- National Weather Service (NWS)
- PyreCast
- Wildland Fire Assessment System (WFAS)
- Weather forecast models:
  - HRRR (High-Resolution Rapid Refresh)
  - NAM 3km and NAM 12km (North American Mesoscale Model)

- GFS 0.125° and GFS 0.250° (Global Forecast System)

**REQUEST NO. 2:**

Please list all internal tools or methodologies that Liberty used to measure and estimate wind speeds and weather at the time of the Mountain View Fire ignition.

**AMENDED RESPONSE:**

Liberty objects to this Question as vague and ambiguous as framed. Subject to and without waiving its objections, Liberty responds as follows:

As of November 17, 2020, the tools Liberty used included its PSPS predictive tool, which provided forecasts for weather conditions relative to Liberty's PSPS thresholds. Liberty utilized a fire weather dashboard (https://tahoefireweather.com/) to monitor forecasted weather conditions across its service territory (and to monitor FPI forecasts that guided operation and maintenance crew activities in the field). Liberty's weather stations and field fuel moisture sampling also provided information on wind speeds and weather conditions. Weather station data was used generally by Liberty's fire science and risk modeling consultant to validate Liberty's PSPS predictive tool through monitoring and comparison of weather forecast models with observed conditions. In the event of a PSPS activation, weather station data, along with data from field observers, would guide the ultimate decision to de-energize. As described in Liberty's response to CalAdvocates-LIB-A2506017-014, Question 3, Liberty also conducted field fuel moisture sampling on 1,000-hour dead fuels and live woody fuels to support situational awareness of longer-term fuel moisture trends and conditions of live fuels.

**REQUEST NO. 3:**

For the period from 2010 through 2020:

a) Please list the dates that Liberty estimates had sustained wind speeds of more than 20 miles per hour (mph) within a five-mile radius of the Mountain View Fire ignition site.
b) Please list the dates that Liberty estimates had sustained wind speeds of more than 60 mph within a five-mile radius of the Mountain View Fire ignition site.

**RESPONSE:**

Liberty objects to this Question as burdensome to the extent it seeks information not maintained in the ordinary course of business. Liberty further objects to this Question as overbroad to the extent it seeks information prior to the start of Liberty's operation in approximately 2011, when it purchased the utility system from NV Energy. Liberty further objects to this Question as vague and ambiguous as to the phrase "the Mountain View Fire ignition site." Subject to and without waiving its objections, Liberty responds as follows:

Liberty understands the phrase "the Mountain View Fire ignition site" to refer to the area of the Subject Span (the span between Pole 266731 ("West Pole") and Pole 40288 ("East Pole")) as described in *Liberty-03: Prudence of Operations*. As of November 17, 2020, there were three weather stations within an approximate five-mile radius of the Mountain View Fire ignition site: LIB-3106/LIB06; LIB-3130/LIB26; and Walker RAWS. Data from all three weather stations are publicly available via MesoWest: https://mesowest.utah.edu/. Data from the two Liberty weather

stations are also publicly available from Western Weather Group: https://liberty.westernweathergroup.com/search.

**REQUEST NO. 4:**

When (i.e., approximately what date and time) did Liberty become aware of the likelihood of hazardous weather conditions (i.e., warm temperatures, high winds, and low humidity combined with dry fuels) occurring on November 17, 2020?

**RESPONSE:**

Liberty objects to this Question as vague and ambiguous as framed. Subject to and without waiving its objections, Liberty responds as follows: Based on weather forecasts, Liberty was not aware of any heightened risk of wildfires on November 17, 2020. As explained in *Liberty-03: Prudence of Operations*, Part VI.B.2, the National Weather Service (NWS) issued a High Wind Warning for November 17, 2020 but did not issue a Red Flag Warning and its briefings in the days leading up to November 17, 2020 did not indicate any heightened wildfire threat. *See* Liberty-03 at 40. Likewise, the forecast Fire Potential Index for the Topaz zone ranged from "Low" to "Moderate," meaning there was no anticipated elevated fire threat conditions. *See* Liberty-03 at 34-35 and the attachment *FPI Forecasts.pdf*.

**REQUEST NO. 5:**

Please provide the information in the table below regarding how many Liberty-owned weather stations Liberty has in its service territory, both on November 17, 2020 and at the current time, separated by High Fire-Threat District (HFTD) tier.
Number of weather stations in Liberty's service territory

| Date | Non HFTD | HFTD Tier 2 | HFTD Tier 3 |
|---|---|---|---|
| November 17, 2020 | | | |
| July 31, 2025 | | | |

**RESPONSE:**

Number of weather stations in Liberty's service territory

| Date | Non HFTD | HFTD Tier 2 | HFTD Tier 3 |
|---|---|---|---|
| November 17, 2020 | 3 | 25 | 1 |
| July 31, 2025 | 5 | 33 | 1 |

**REQUEST NO. 6:**

Regarding Liberty's weather station network:

a) As of November 17, 2020, how did Liberty determine how many weather stations it should install and where to place them?

b) Provide documentation from 2020 showing Liberty's weather station siting criteria.
c) Have Liberty's standards for determining how many weather stations to install and where to place them changed between November 17, 2020 and the present? If so, describe the changes, including when those changes took place.

**RESPONSE:**

a) As of November 17, 2020, Liberty had engaged a third-party expert consultant (Western Weather Group) to support installation of Liberty-owned weather stations, including determining the number of weather stations to install and their locations. As Liberty has explained in its Wildfire Mitigation Plan, the priority locations were chosen based on several factors, including existing weather stations providing publicly available data, gaps within Liberty's service area where a weather station would be beneficial, and the potential wildfire impact and prevailing weather trends in an area.
b) Please refer to Liberty's response to subpart (a).
c) No.

**REQUEST NO. 7:**

In the Application, Exhibit Liberty-03, page 35, Liberty states:
Liberty installed ten weather stations in 2019 and an additional 19 weather stations in 2020. Enhanced collection of weather data provided valuable inputs and improved accuracy for Liberty's PSPS and FPI tools and helped Liberty plan for operations during extreme weather events.

a) Describe how Liberty used its weather station data as inputs for its PSPS operations as of November 17, 2020?
b) Describe how Liberty used its weather station data as inputs for its FPI tool as of November 17, 2020?

**AMENDED RESPONSE:**

Liberty objects to this Question as vague and ambiguous as framed. Subject to and without waiving its objections, Liberty responds as follows:

a) As of November 17, 2020, as referenced in Liberty's amended response to CalAdvocates-LIB-A2506017-006, Question 3, data from Liberty's weather stations were used generally by Liberty's fire science and risk modeling consultant to validate Liberty's PSPS predictive tool through monitoring and comparison of weather forecast models with observed conditions. In the event of a PSPS activation, weather station data, along with data from field observers, would guide the ultimate decision to de-energize.
b) For an explanation of how Liberty calculated its forecast FPI values during the relevant timeframe, please refer to pages 35-38 of *2021 Wildfire Mitigation Update (Public Version).pdf*, attached to Liberty's response to CalAdvocates-LIB-A2506017-001, Question 13. Liberty's weather station data were not direct inputs to this calculation.

**REQUEST NO. 8:**

In the Application, Exhibit Liberty-03, page 34, Liberty states:
Liberty's FPI tool provided a seven-day forecast for 11 different geographic zones across

Liberty's service area, ranking fire risk conditions on a five-category scale: Low, Moderate, High, Very High, and Extreme.

a) Explain how Liberty ensured the accuracy and validity of its Fire Potential Index (FPI) tool.
b) How often did Liberty perform validation of its FPI tool?
c) Provide a copy of Liberty's seven-day forecast from each of the following days: November 11, 2020; November 12, 2020; November 13, 2020; November 14, 2020; November 15, 2020; November 16, 2020; and November 17, 2020.
d) As of November 2020, did Liberty have a method or protocol to calculate FPI in real-time?
e) If the answer to part (d) is yes, explain what real-time inputs were used and how Liberty measured those inputs.
f) If the answer to part (d) is no, explain why not.

**AMENDED RESPONSE:**

Liberty objects to this Question as vague and ambiguous as framed. Subject to and without waiving its objections, Liberty responds as follows:

a) As explained in *Liberty-03: Prudence of Operations*, Liberty developed and implemented an FPI tool, with the help of a third-party fire science and risk modeling consultant. Liberty's FPI forecasts were obtained from the U.S. Forest Service Wildland Fire Assessment System ("WFAS"), which calculated these forecasts based on two National Fire Danger Rating System ("NFDRS") indices—Energy Release Component ("ERC") and Burning Index ("BI").
b) Liberty understands the term "validation" to refer to the comparison of predicted outcomes with actual outcomes to assess the accuracy of a model. Liberty understands that its fire science and risk modeling consultant monitored FPI forecasts. Because Liberty's FPI forecast differentiated fire risk as low, moderate, high, very high, and extreme, it could not specifically be "validated" by comparison to specific weather observations.
c) Liberty understands this subpart to be referring to seven-day FPI forecasts described in *Liberty-03: Prudence of Operations*. Please refer to attachment *FPI Forecasts.pdf* for forecasts beginning at 0000 hours on November 11, 2020 to 1800 hours on November 17, 2020, in six-hour intervals for each of the 11 geographic zones in Liberty's service area.
d) Liberty had a fire weather dashboard (https://tahoefireweather.com/) that displayed FPI forecasts by zone. Liberty understands that FPI forecasts were updated once per day and thus did not reflect FPI at a particular present moment.
e) N/A
f) As referenced in Liberty's responses to CalAdvocates-LIB-A2506017-017, Question 2 and CalAdvocates-LIB-A2506017-029, Question 1, FPI forecasts were used to guide operation and maintenance crew activities so Liberty personnel could mitigate the risk of fire from field work during higher fire risk periods (e.g., use of equipment, off-road driving, assigning fire safety personnel, etc.). The daily FPI forecast was sufficient for this purpose.

# ATTACHMENT 10

# Liberty's Amended Response to CalAdvocates-LIB-A2506017-029

Liberty Utilities (CalPeco Electric) LLC
933 Eloise Avenue
South Lake Tahoe, CA 96150
Tel: 800-782-2506
Fax: 530-544-4811

December 3, 2025

**Liberty Utilities (CalPeco Electric) LLC**

**A.25-06-017**
**WEMA**

**The Public Advocates Office**

| | |
|---|---|
| Data Request No.: | CalAdvocates-LIB-A2506017-029 |
| Requesting Party: | Public Advocates Office |
| Originator: | Amanda Asadi, Amanda.Asadi@cpuc.ca.gov |
| | Aaron Louie, Aaron.Louie@cpuc.ca.gov |
| | Patrick Huber, Patrick.Huber@cpuc.ca.gov |
| cc: | Matthew Karle, Matthew.Karle@cpuc.ca.gov |
| | Cal Advocates Wildfire Discovery CalAdvocates.WildfireDiscovery@cpuc.ca.gov |
| Date Received: | October 15, 2025 |
| Due Date: | October 29, 2025 |
| Response Date: | October 29, 2025 |
| Amended Response Date: | December 3, 2025 |

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Attachments to these responses contain information marked confidential in accordance with applicable law and regulation. The basis for confidentiality is set forth in accompanying confidentiality declaration. Public disclosure is restricted.

## Situational Awareness

**REQUEST NO. 1:**

In Liberty's response to Data Request CalAdvocates-LIB-A2506017-017, Question 2, Liberty states:

"FPI forecasts were used to guide operation and maintenance crew activities, and were not used for PSPS decision-making or system operations. Please refer to attachment LU Fire Prevention Plan 10-9-2020.pdf, which described operating procedures for the five categories of FPI risk conditions."

a) Elaborate on why FPI forecasts were used to guide operation activities but not used for system operations.
b) Other than the activities listed in the Fire Prevention Plan,[1] what else did Liberty use its FPI forecasts for?
c) When did Liberty start generating FPI forecasts?
d) When did Liberty start using its FPI forecasts?
e) Provide a copy of all of Liberty's FPI forecasts for the Topaz 1261 circuit from the time Liberty began generating FPI forecasts through November 10, 2020.

**RESPONSE:**

Liberty objects to this Question as vague and ambiguous as framed. Subject to and without waiving its objections, Liberty responds as follows:

a) Because the Fire Potential Index forecasts generated on a daily basis were intended to assess fire risk based on correlation with fire occurrence and final fire size of all causes, it was a useful guide for Liberty's operation and maintenance crew activities to mitigate the risk of fire from field work during higher fire risk periods (e.g., use of equipment, off-road driving, assigning fire safety personnel, etc.). The FPI scale differentiated fire risk as low, moderate, high, very high, and extreme, which was not at the level of granularity needed to make PSPS decisions. As explained in *Liberty-03: Prudence of Operations* (at pp. 37-39), Liberty's PSPS decision-making was based on quantitative thresholds for three criteria also intended to capture the risk of wildfire ignition and spread: Energy Release Component; wind gusts; and Fosberg Fire Weather Index. For reclose blocking restrictions, Liberty enabled "fire mode" or non-reclose mode on a seasonal basis based on a variety of factors and with input from its fire science and risk modeling consultant, and did not implement those restrictions based on the daily FPI.
b) The Fire Prevention Plan set forth the comprehensive list of activities and operating restrictions based on FPI levels.
c) Liberty does not generate FPI forecasts internally. In 2019 Liberty hired a fire science and risk modeling consultant to develop an FPI methodology and in 2020, Liberty began populating its fire weather dashboard with FPI forecasts calculated by the U.S. Forest Service Wildland Fire Assessment System ("WFAS") based on two National Fire Danger Rating System ("NFDRS") indices—Energy Release Component ("ERC") and Burning Index ("BI").
d) See Liberty's response to subpart (c).
e) Liberty does not have access to fire weather dashboard data from the specified time frame given the passage of time.

[1] See FPP at p. 5-6.

**REQUEST NO. 2:**

In Liberty's response to Data Request CalAdvocates-LIB-A2506017-008, Question 8a, Liberty states "Liberty's fire science and risk modeling consultant validated its FPI tool by comparing forecasted conditions with real-time weather station observations and archived forecast data."

a) Who was Liberty's fire science and risk modeling consultant?
b) Did Liberty's fire science and risk modeling consultant provide Liberty with documentation showing that it had validated its FPI tool by comparing forecasted conditions with real-time weather station observations and archived forecast data? If so, provide a copy of that documentation.
c) If the answer to subpart (b) is no, explain why not.

**RESPONSE:**

Liberty objects to this Question as vague and ambiguous as framed and as to the term "validate." Liberty understands the term "validate" to refer to the comparison of predicted outcomes with actual outcomes to assess the accuracy of a model. Subject to and without waiving its objections, Liberty responds as follows:

a) Liberty's fire science and risk modeling consultant as of November 17, 2020 was Reax Engineering, and specifically Dr. Chris Lautenberger (now at CloudFire).
b) Liberty understands that its fire science and risk modeling consultant monitored FPI forecasts, but did not specifically perform "validations" of the FPI tool on an ongoing basis. Rather, the consultant performed validations of the PSPS predictive tool through monitoring and comparison of weather forecast models with observed conditions. Liberty will amend its responses to CalAdvocates-LIB-A2506017-008.

   Because Liberty's FPI forecast differentiated fire risk as low, moderate, high, very high, and extreme, it could not be "validated" by comparison to specific weather observations. For details regarding Reax's ongoing monitoring of FPI forecasts, please refer to subtask number eight of Reax's proposed scope of work for the development of a Fire Potential Index for Liberty, on page 3 of confidential attachment *CONFIDENTIAL-2019-10-08 - Reax Liberty Utilities FPI proposal_Redacted.pdf*.
c) N/A

**REQUEST NO. 3:**

In Liberty's response to Data Request CalAdvocates-LIB-A2506017-008, Question 8b, Liberty states "Validation [of Liberty's FPI tool] performed on an ongoing basis through monitoring and comparison of forecasted versus observed conditions."

a) Provide documentation showing that this validation was performed on an ongoing basis.
b) Did Liberty perform any review of these validations? If so, provide documentation showing Liberty's review.
c) If the answer to subpart (b) is no, explain why not.

**RESPONSE:**

Liberty objects to this Question as vague and ambiguous as framed and as to the term "validation." Liberty understands the term "validation" to refer to the comparison of predicted

outcomes with actual outcomes to assess the accuracy of a model. Subject to and without waiving its objections, Liberty responds as follows:

a) Please refer to Liberty's response to Question 2(b) of this set of data requests.
b) See Liberty's response to subpart (a).
c) See Liberty's response to subpart (a).

**REQUEST NO. 4:**

Regarding Liberty's response to Data Request CalAdvocates-LIB-A2506017-017, Question 2, Liberty's attachment *Fire Prevention Plan for Overhead Electric Facilities* dated October 9, 2020:

a) Was this the version of Liberty's Fire Prevention Plan in effect on November 17, 2020?
b) If the answer to subpart (a) is no, provide the copy of the Fire Prevention Plan that was in effect on November 17, 2020.

**RESPONSE:**

a) Yes.
b) N/A

**REQUEST NO. 5:**

In the Application, Exhibit Liberty-03, page 35, Liberty states: "Liberty installed ten weather stations in 2019 and an additional 19 weather stations in 2020."

a) Prior to the Mountain View Fire ignition, what did Liberty use its weather station data for?
b) Prior to the Mountain View Fire ignition, when did Liberty observe its real-time weather station data?
c) Did Liberty have a dashboard or other user interface that it used to pull and observe real-time weather station data? If yes, provide documentation showing how employees used this dashboard or other user interface.
d) If the answer to subpart (c) is no, explain how Liberty would be able to observe its real-time weather station data.
e) Prior to the Mountain View Fire ignition, did Liberty ever use data from its weather stations for any non-forecasting activities? If yes, explain what these were and provide documentation showing how Liberty used this data.
f) If the answer to subpart (e) is no, explain why.

**RESPONSE:**

Liberty objects to this Question as vague and ambiguous as framed. Subject to and without waiving its objections, Liberty responds as follows:

a) Prior to November 17, 2020, Liberty used its weather station data to monitor weather conditions across its service territory, to validate and improve the accuracy of forecast models, and, in the event of a PSPS activation, to guide the ultimate decision to de-energize along with other inputs such as field observations.

b) In addition to general monitoring of weather conditions across its service territory, Liberty increased its monitoring of real-time weather data during PSPS events and in anticipation of and during severe weather conditions such as winter storms.
c) Liberty objects as vague and ambiguous to the term "documentation." Real-time weather station data reported by Liberty's weather stations are available on Western Weather Group's publicly available website: https://liberty.westernweathergroup.com/. This dashboard was generally available to Liberty employees. See Liberty's responses to subparts (a) and (b) of this Question for how Liberty used real-time weather data.
d) N/A
e) Liberty's fire science and risk modeling consultant would meet with Liberty to review weather data after the occurrence of weather events such as wind, storm, and precipitation events on its system.
f) N/A

**REQUEST NO. 6:**

In Liberty's response to Data Request CalAdvocates-LIB-A2506017-017, Question 3, Liberty states:

"In addition, because the [Energy Release Component or ERC] percentile forecasts displayed on Liberty's fire weather dashboard were obtained from the U.S. Forest Service Wildland Fire Assessment System ("WFAS"), it is possible that some data in the ERC tables did not display correctly on occasion due to delays or other issues with WFAS reporting, such as when there was an outage in the WFAS."

a) Did Liberty have a protocol in place to address delays or other issues with WFAS reporting? If so, provide a copy of the protocol.
b) If the answer to subpart (a) is no, explain why not.
c) Did Liberty document when these delays or other issues with WFAS reporting occurred? If so, provide a copy of a record prior to the Mountain View Fire ignition showing the most recently documented issue related to delayed or other issues with WFAS reporting.
d) If the answer to subpart (c) is no, explain why not.

**RESPONSE:**

Liberty objects to this Question as vague and ambiguous as framed. Subject to and without waiving its objections, Liberty responds as follows:

a) Liberty did not have a formal protocol to address delays or other WFAS reporting issues. Liberty's fire science and risk modeling consultant helped monitor system reliability and Liberty communicated with him regarding issues on an as-needed basis.
b) See Liberty's response to subpart (a).
c) Liberty is not aware of records formally tracking delays or other issues with WFAS reporting.
d) See Liberty's response to subpart (a).

**REQUEST NO. 7:**

In Liberty's 2020 Wildfire Mitigation Plan Annual Report on Compliance, March 31, 2021, at 3 states:

"In 2020, Liberty installed 19 out of 20 targeted weather stations, bringing the total number of weather stations to 29. Fuel moisture sensors were also added to weather stations installed in 2020 and retrofitted to several of the locations installed in 2019. Fuel moisture sensors can help to validate fuel moisture conditions, which is crucial to accurately predict wildfire risk in local areas."

a) Explain why Liberty was unable to install the 20th weather station in 2020.
b) Where was this weather station located, and did Liberty eventually install it?

**RESPONSE:**

Liberty objects to this Question as vague and ambiguous as framed and assuming facts. Subject to and without waiving its objections, Liberty responds as follows:

a) Liberty targeted the installation of 30 weather stations between 2019 and 2020. Liberty ultimately installed 29 weather stations during that timeframe. After diligent inquiry and reasonable search, Liberty has not located records as to why a 30th weather station was not installed by the end of 2020. After 2020, the next weather station Liberty installed on its system was LIB-3133 (Tahoe-7300 Sugar Pine Point).
b) See Liberty's response to subpart (a).

**REQUEST NO. 8:**

In Liberty's 2020 Wildfire Mitigation Plan Annual Report on Compliance, March 31, 2021, at 3 states:

In 2020, Liberty installed 19 out of 20 targeted weather stations, bringing the total number of weather stations to 29. Fuel moisture sensors were also added to weather stations installed in 2020 and retrofitted to several of the locations installed in 2019. Fuel moisture sensors can help to validate fuel moisture conditions, which is crucial to accurately predict wildfire risk in local areas.

Provide an Excel file which identifies each Liberty's weather station that Liberty retrofitted with fuel moisture sensors with the following information:

a) Unique ID number or identifier;
b) Name
c) Geographic location
d) Date that weather station was installed
e) Date that Liberty installed the fuel moisture sensor
f) Whether or not the station or fuel moisture sensor was not working
g) If the station or fuel moisture sensor had issues, explain what did Liberty do to address the issue, when did Liberty realize the issue had occurred, and when did Liberty resolve the issue.

**RESPONSE:**

Liberty objects to this Question as vague and ambiguous as framed. Liberty further objects to this Question as overbroad and unduly burdensome. Subject to and without waiving its objections, Liberty responds as follows: See attachment *CalAdvocates-LIB-A2506017-029-Q8.xlsx* for the information requested in subparts (a)-(d) for the ten Liberty weather stations installed between May 2019 and April 2020. The information requested in subparts (e)-(g) is not

maintained in the ordinary course of business and is not readily accessible. Liberty has included a column with information regarding the earliest fuel moisture readings available in archival data for these stations to provide insight regarding the timing of installation of fuel moisture sensors for the Liberty weather stations installed between May 2019 and April 2020. Liberty constructed this spreadsheet using publicly available archival data of Liberty's weather stations at https://liberty.westernweathergroup.com/.

## Control Center

**REQUEST NO. 9:**

In Liberty's response to Data Request CalAdvocates-LIB-A2506017-017, Question 4e and 4f, Liberty states:

"Liberty's operations team in California was responsible for monitoring Liberty's fire weather dashboard and communicating PSPS and other operational decisions to Liberty Utilities' System Control Center in New Hampshire as needed. Please refer to Liberty's responses to Questions 1-2 of this set of data requests and Liberty's response to CalAdvocates-LIB-A250617-006, Question 3."

a) Clarify the name of Liberty's operations team in California who was responsible for monitoring Liberty's fire weather dashboard and communicating PSPS and other operational decisions to Liberty's Control Center.
b) On each of the days leading up to the Mountain View Fire ignition, starting from November 11, 2020, up through November 17, 2020, how many staff in Liberty's operations team in California did Liberty have actively monitoring Liberty's fire weather dashboard and communicating PSPS and other operational decisions to Liberty's Control Center?
c) Identify any times, from November 11, 2020 through November 17, 2020, when there were no staff on duty in Liberty's operations team in California
d) From November 11, 2020 up through November 17, 2020, did Liberty's operations team in California actively monitor Liberty's weather station data in real-time. If yes, elaborate. If not, explain why not.
e) From November 11, 2020 up through November 17, 2020, where was Liberty's operations team in California located?
f) How did Liberty's operations team in California use Liberty's FPI Forecasts to inform its decision-making?
g) How did Liberty's operations team in California use Liberty's real-time weather data (including, but not limited to, weather station data) to inform its decision-making?

**RESPONSE:**

Liberty objects to this Question as vague and ambiguous as framed. Subject to and without waiving its objections, Liberty responds as follows: Liberty did not have a PSPS activation within the specified time frame and did not activate its Incident Management Team (IMT) prior to the Mountain View Fire. Liberty understands the term "operations team" to refer generally to its operations personnel in California, not the IMT that would have been activated during a PSPS event.

a) Liberty's California operations team included the Senior Manager of Wildfire Prevention, the Vice President of Operations, the Director of Operations, and the Emergency Management Manager. This team was responsible for monitoring Liberty's fire weather dashboard and communicating with Liberty's System Control Center and other personnel regarding potential PSPS events.
b) Liberty's fire weather dashboard and real-time weather data were accessible on publicly available websites and available to all employees at all times. Liberty does not have specific records tracking when and how many operations personnel accessed the data at any given time. See Liberty's response to subpart (a).
c) There would be no time during the specified time frame when Liberty had no California operations personnel available.
d) See Liberty's response to subpart (b).
e) Due to the Covid-19 pandemic, much of Liberty's California operations personnel worked virtually within the specified timeframe. A limited number of operations personnel worked in Liberty's two offices Tahoe Vista and South Lake Tahoe within the specified timeframe.
f) Please refer to Liberty's response to CalAdvocates-LIB-A2506017-017, Question 2 and attachment *LU Fire Prevention Plan 10-9-2020.pdf* contained therein.
g) See Liberty's response to Question 5 of this set of data requests.

**REQUEST NO. 10:**

In the Application, Exhibit Liberty-03, page 43, Liberty states:

"In accordance with GO 166, Liberty had an Emergency Management Plan ("EMP") in 2020 that contained policies and procedures to enhance Liberty's ability to respond to and recover from emergencies of all levels, including natural disasters."

a) Provide a copy of Liberty's Emergency Management Plan that was in effect on November 17, 2020 if different from the copy provided in Liberty's response to Data Request CalAdvocates-LIB-A2506017-002, Question 2.
b) Identify the date on which the EMP in effect on November 17, 2020 was adopted.
c) Was Liberty's operations team in California required to be trained on Liberty's EMP?
d) Were Liberty's Control Center System Operators and Managers required to be trained on Liberty's EMP?

**AMENDED RESPONSE:**

a) Liberty has located a copy of its Emergency Management Plan that it understands to have been in effect on November 17, 2020, see confidential attachment *CONFIDENTIAL-Corporate Emergency Management Plan_2020 GO 166 Report.pdf*. Liberty understands the attachment *Corporate Emergency Management Plan_2020.docx* attached to its response to CalAdvocates-LIB-A2506017-002, Question 2 to have been an earlier version of its Corporate Emergency Management Plan. The relevant sections of *Corporate Emergency Management Plan_2020.docx* Liberty specifically referred to in its response to CalAdvocates-LIB-A2506017-002, Question 2 are identical across these two versions of the Corporate Emergency Management Plan.

b) Liberty understands *CONFIDENTIAL-Corporate Emergency Management Plan_2020 GO 166 Report.pdf* to have been adopted between June 25, 2020 and October 30, 2020, when it was submitted to the Commission as part of its 2020 GO 166 Report.
c) Yes, Liberty requires employees who are part of Liberty's Incident Management Team to be trained on its EMP, consistent with GO 166.
d) System Control Center personnel are included in Liberty's emergency management training and exercises.

## Public Safety Power Shutoffs (PSPS)

**REQUEST NO. 11:**

Regarding Liberty's *2019 PSPS Post-Event Report for September 10 to September 14, 2019*, December 31, 2019:

a) Provide a copy of all the forecasts that Liberty's Tahoe Fire Weather Monitoring tool provided for each day from September 7, 2019 through September 14, 2019.
b) For this event, did Liberty use real-time weather station data in its PSPS decision-making? If so, explain.
c) If the answer to subpart (b) is no, explain why not.
d) Did Liberty's operations team in California alert Liberty's Control Center of the potential PSPS event?
e) What was Liberty's Control Center's role in this event?

**RESPONSE:**

Liberty objects to this Question as vague and ambiguous as framed. Liberty further objects to this Question as unduly burdensome to the extent it seeks information not maintained by Liberty in the ordinary course of business. Subject to and without waiving its objections, Liberty responds as follows:

a) Liberty does not have access to fire weather dashboard data from the specified time frame given the passage of time.
b) As set forth in its Post Event Report, see attachment *PSPS Post Event Report for September 10 to September 14, 2019.pdf*, Liberty made the decision to activate and, in turn, de-mobilize its event team based on forecast data.
c) Please refer to attachment *PSPS Post Event Report for September 10 to September 14, 2019.pdf*.
d) Liberty did not locate specific records documenting its communications with the System Control Center during this potential PSPS event, but its PSPS event team would have been in contact with the System Control Center regarding this potential PSPS event.
e) In accordance with its usual role of monitoring Liberty's electric system and coordinating with personnel in California to respond to issues that arise, Liberty's System Control Center would have been responsible for executing operational changes communicated to it by the PSPS event team in California.

**REQUEST NO. 12:**

Regarding Liberty's *PSPS Report on the November 21, 2018 De-Energization Event*:

a) Provide a copy of all the forecasts that Liberty used from November 15, 2018 through November 21, 2018.
b) For this event, did Liberty use real-time weather station data in its PSPS decision-making? If so, explain.
c) If the answer to subpart (b) is no, explain why not.
d) Where was Liberty's Control Center located?
e) Did Liberty's operations team in California alert Liberty's Control Center of the potential PSPS event?
f) What was Liberty's Control Center's role in this event?

**RESPONSE:**

Liberty objects to this Question as vague and ambiguous as framed. Liberty further objects to this Question as unduly burdensome to the extent it seeks information not maintained by Liberty in the ordinary course of business. Subject to and without waiving its objections, Liberty responds as follows:

a) Please refer to attachment *November 21, 2018 De-Energization Event.pdf* and Attachment 1 contained therein for forecast information Liberty used in the lead up to the November 21, 2018 de-energization event.
b) Liberty objects to the term "PSPS decision-making" as this event predated Liberty's formal PSPS protocol. Please refer to attachment *November 21, 2018 De-Energization Event.pdf* for discussion of Liberty's decision-making based on forecast and actual conditions. At the time of this de-energization event on November 21, 2018, Liberty had not yet installed its own weather stations.
c) See Liberty's response to subpart (b).
d) As described in *Liberty-03: Prudence of Operations* (at p. 32), during the specified time frame, Liberty was in the process of transitioning its system control functions from NV Energy in Nevada to Liberty Utilities in New Hampshire. As of November 21, 2018, NV Energy's system control center operated two of the three de-energized lines (the 625 and 111 Lines) and Liberty's System Control Center in New Hampshire operated the 3400 laterals.
e) Liberty did not locate specific records documenting its communications with the System Control Center during this proactive de-energization event, though the System Control Center would have executed circuit de-energization and re-energization for this event.
f) See Liberty's response to subpart (e).

# ATTACHMENT 11

# Expert Opinions of Mr. David Geier in Mountain View Fire Civil Litigation

**Utility Safety Associates, Inc.**

**Liberty Utilities**

**Expert Opinions**

**Opinion #1**

It is my opinion that bare conductor powerlines were the utility industry standard for overhead powerlines in 2020, and Liberty Utilities was proactive in hardening the Topaz 1261 circuit with covered conductor.

**Opinion #2**

I agree with Mr. Hylton that the 300 ft span of bare conductor between poles P26673 and P40288 was compliant with GO 95 without the use of spacers and/or dampers.

**Opinion #3**

I agree with Mr. Hylton that the inspection program for circuit Topaz 1261 was compliant with GO165. It is my opinion that it is not standard utility industry practice to replace overhead powerlines on a "regular" basis and that run to failure concept does not apply for overhead powerlines.

**Opinion #4**

I agree with Mr. Hylton that hardening the Topaz 1261 circuit in six phases was not an issue. It is my opinion that this project was a proactive step to reduce outages on the circuit. I could not determine where the failures happened on the circuit. I agree with Mr. Hylton that these projects are typically done from the source end of the circuit. I disagree with Mr. Hylton that you should critical of the the six phase upgrade approach because of the potential ignition. This was an unforeseeable event that could not be predicted when the project was scoped.

**Opinion #5**

I agree with Mr. Hylton that Topaz 1261 was the worst performing reliability circuit due to a 2019 58 hour outage and supply side outages to the substation owned by Nevada Power company. Regardless of the reason for being the worst performing circuit, Liberty Utilities was proactive in hardening the line.

**Opinion #6**

I disagree with Mr. Hylton's position that reclosers should not be set to trip for line-to-ground faults for overhead power lines. Animal contacts are an example of transient line-to-ground faults that could be restored with reclosers.

# ATTACHMENT 12

# CO 150, SCE Distribution Overhead Construction Standards, 2020 Fourth Quarter

# SOUTHERN CALIFORNIA EDISON
## TRANSMISSION AND DISTRIBUTION

# Distribution Overhead Construction Standards (DOH)

## 2020 — FOURTH QUARTER ISSUE
**October 30, 2020**

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## CO 150 Sag Chart #4 Copper and #4 ACSR

### Scope CO 150.1 Sag — Temperature Stringing Table #4 Copper and #4 ACSR for Heavy-Loading Areas

**Table CO 150–1: Sag — Temperature Stringing Table #4 Copper and #4 ACSR for Heavy-Loading Areas**

| Span (ft) | Sag | | | | | |
|---|---|---|---|---|---|---|
| | Initial Stringing Sag | | | | Final Sag | |
| | 50°F | 70°F | 90°F | 110°F | 70°F | 130°F |
| 100 | 0'-6" | 0'-10" | 1'-0" | 1'-4" | 1'-1" | 1'-10" |
| 120 | 0'-11" | 1'-2" | 1'-6" | 1'-10" | 1'-7" | 2'-5" |
| 140 | 1'-6" | 1'-10" | 2'-1" | 2'-5" | 2'-4" | 3'-0" |
| 160 | 2'-2" | 2'-5" | 2'-10" | 3'-1" | 3'-0" | 3'-8" |
| 180 | 2'-11" | 3'-4" | 3'-7" | 3'-11" | 3'-8" | 4'-6" |
| 200 | 3'-10" | 4'-1" | 4'-6" | 4'-10" | 4'-7" | 5'-5" |
| 220 | 4'-10" | 5'-1" | 5'-5" | 5'-8" | 5'-7" | 6'-5" |
| 240 | 5'-10" | 6'-2" | 6'-6" | 6'-10" | 6'-8" | 7'-6" |
| 260 | 7'-0" | 7'-4" | 7'-7" | 8'-0" | 7'-10" | 8'-8" |
| 280 | 8'-2" | 8'-7" | 8'-11" | 9'-2" | 9'-1" | 9'-11" |
| 300 | 9'-7" | 9'-11" | 10'-2" | 10'-6" | 10'-5" | 11'-4" |
| 320 | 11'-0" | 11'-5" | 11'-8" | 12'-0" | 11'-10" | 12'-8" |
| 340 | 12'-7" | 12'-11" | 13'-2" | 13'-6" | 13'-5" | 14'-4" |
| 360 | 14'-2" | 14'-6" | 14'-10" | 15'-1" | 15'-0" | 15'-11" |
| 380 | 15'-11" | 16'-2" | 16'-6" | 16'-10" | 16'-8" | 17'-7" |
| 400 | 17'-8" | 18'-0" | 18'-4" | 18'-7" | 18'-6" | 19'-5" |
| 420 | 19'-7" | 19'-11" | 20'-2" | 20'-6" | 20'-5" | 21'-4" |
| 440 | 21'-7" | 21'-11" | 22'-2" | 22'-6" | 22'-5" | 23'-4" |
| 460 | 23'-8" | 24'-0" | 24'-4" | 24'-7" | 24'-6" | 25'-5" |
| 480 | 25'-10" | 26'-2" | 27'-0" | 27'-4" | 26'-7" | 27'-7" |
| 500 | 28'-1" | 28'-5" | 28'-8" | 29'-1" | 28'-11" | 29'-11" |

### 1.0 Guying

Conductor tensions for guying #4 copper is 484 lb.

Conductor tensions for guying #4 ACSR is 604 lb.

### 2.0 Ground Clearance

Use 130°F sags when calculating conductor-to-ground clearances.

# ATTACHMENT 13

# Figure 12, PG&E Sags and Tensions for Overhead Conductors on Pole Lines

Prepared by: [redacted]

# SAGS AND TENSIONS FOR OVERHEAD CONDUCTORS ON POLE LINES

015221

| | | | |
|---|---|---|---|
| **Dept:** | Electric Distribution | **Section:** | Design and Construction |
| **Approved by:** | [redacted] | **Date:** | 3/25/22 |

**Rev. #**05: This Document supersedes Engineering Standard 015221, Rev. #04. For a description of the changes see Page 132.

## General Notes

### Ruling Span

The sag and tension data given herein are based upon the assumption that conductor tension, at any particular time, will be the same in each span throughout a series of spans of varying length between deadend poles. Tests have shown that wood pole construction is quite flexible. Therefore, when temperature changes or changes in loading tend to cause different tensions to exist in spans of different lengths, the poles and conductor support systems are flexible enough to equalize these differences and the conductor tensions will be substantially the same in all spans. Thus, it is possible to calculate the length of a theoretical span which will have the same changes in conductor tension due to changes of temperature and conductor loading as will be found in a series of spans of varying lengths between deadends. This calculated theoretical span length is called the “Ruling Span” for a section of line between deadend poles.

“Deadend” here means deadend insulators and guyed ahead and back. The Ruling Span is the square root of the sum of the cubes of the spans divided by the sum of the spans.

$$\text{R.S.} = \left[\frac{\sum S^3}{\sum S}\right]^{1/2} = \left[\frac{S_1{}^3 + S_2{}^3 + S_3{}^3 \ldots\ldots S_n{}^3}{S_1 + S_2 + S_3 \ldots\ldots S_n}\right]^{1/2}$$

### Use of Ruling Span Data

Every series of spans between deadend poles has its own particular Ruling Span, so it will be impractical to calculate the sag data for every Ruling Span which might exist. However, errors involved in using a Ruling Span which does not exactly fit the Ruling Span of a section of line are small and can be neglected. There is a disadvantage in using short Ruling Span sag and tension data for a line which actually has a longer Ruling Span. The use of an unduly short Ruling Span will result in using longer poles than would have been required had a more correct, longer Ruling Span been used.

Suitable Ruling Spans which meet the normal conditions existing on our lines have already been determined for the sag and tension data given on the following pages. Thus, the sags and tensions given can be applied directly without further computation, provided the span lengths are within the allowable span range as shown.

If a series of short spans occur next to a series of long spans, there should be a deadend between them.

Occasionally, there may be several long spans in succession or there may be long spans with one or two short spans between. To deadend each long span at both ends would mean a deadend at nearly every pole. In such cases, it will be more economical to deadend at each end of the section in which the long spans are included and use a long Ruling Span for that section.

### Structure Location

If the topography is flat to gently rolling, a profile and design templates are not necessary for pole location and finding required pole length. However, if the topography is rolling to rough terrain, a profile should be made and the proper design template constant should be used to determined pole location and length. This is most important for transmission lines where span lengths tend to be longer.

## Sags and Tensions for Overhead Conductor on Wood Pole Lines

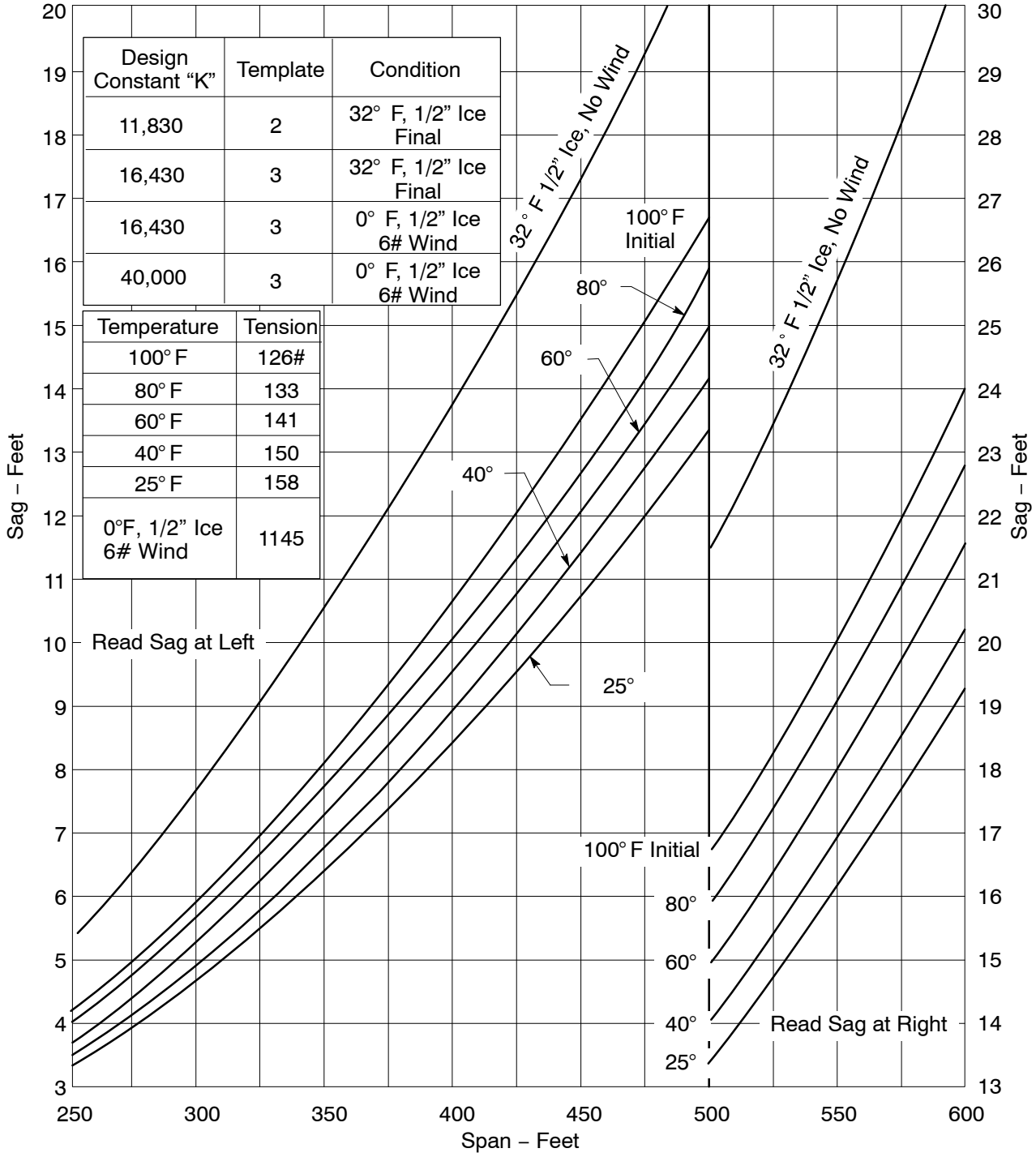


**Figure 12**
**Sag Curves for No. 4 – 7/1 ACSR**
**Heavy Loading Area for All Spans**
Based on 400 Ft. Ruling Span

# ATTACHMENT 14

# 2020 Inspection Records of Subject Span

## TPZ1261, 40288, 2020-05-06

| | |
|---|---|
| Created | 2020-04-10 21:32:03 UTC by [redacted] |
| Updated | 2021-02-03 19:00:47 UTC by [redacted] |
| Location | 38.5129206972377, -119.466576576233 |
| Status | Fail |
| Inspected By | [redacted] |
| Inspection Date | 2020-05-06 |
| FeederID | TPZ1261 |
| Pole Number (if OH) | 40288 |

## GO165 OH equipment

| | |
|---|---|
| Capacitor Bank | No |
| Cutout (fuses) | Yes |
| Cutout type | glass |
| Disconnects | No |
| Recloser / MO / Viper Switch | No |
| Switch | No |
| Transformer | Yes |
| Transformer ID | 617402 |
| Pole issue (split, rot, stub etc.) | No |
| Priority for Repair on Failed Inspection | Level 3 |
| Condition Codes for Failed Inspections | Idle hardware |
| Inspection comments | Insulator pin on secondary arm, road side |

## System Inventory

| | |
|---|---|
| Type of fuses | T-link |
| CSP Transformer | No |
| Lightning Arresters | Yes |
| Hot clamp with no stirrup | Yes |
| Primary wire clamps (non hot clamp i.e. PG) | Yes |
| Open wire secondary | No |
| Grey wire service | No |
| Bare wire (such as bare jumpers) | No |
| Loose tie wires | No |
| Aluminum Bells | No |
| Splices | Yes |
| Number of Splices | 4 |
| Tree attachments | No |
| Joint Pole | Yes |
| Joint Pole details | Both |

Photo(s) of structure

## Pole Replacement Tracking

| | |
|---|---|
| Design Complete? | No |

## Risk Ratings

| | |
|---|---|
| HFTD (High Fire Threat District) | 2 |

## TPZ1261, 266731, 2020-05-06

| | |
|---|---|
| Created | 2020-04-10 21:31:21 UTC by [redacted] |
| Updated | 2020-05-06 18:44:05 UTC by [redacted] |
| Location | 38.5129340767171, -119.467617608607 |
| Status | Pass |
| Inspected By | [redacted] |
| Inspection Date | 2020-05-06 |
| FeederID | TPZ1261 |
| Pole Number (if OH) | 266731 |

## GO165 OH equipment

| | |
|---|---|
| Capacitor Bank | No |
| Cutout (fuses) | Yes |
| Cutout type | glass |
| Disconnects | No |
| Recloser / MO / Viper Switch | No |
| Switch | No |
| Transformer | Yes |
| Transformer ID | 519889 |
| Pole issue (split, rot, stub etc.) | No |

## System Inventory

| | |
|---|---|
| Type of fuses | T-link |
| CSP Transformer | No |
| Lightning Arresters | No |
| Hot clamp with no stirrup | No |
| Primary wire clamps (non hot clamp i.e. PG) | No |
| Open wire secondary | No |
| Grey wire service | No |
| Bare wire (such as bare jumpers) | No |
| Loose tie wires | No |
| Aluminum Bells | No |
| Splices | No |
| Tree attachments | No |
| Joint Pole | Yes |
| Joint Pole details | Both |

Photo(s) of structure

# ATTACHMENT 15

# Excerpts from November 11-17, 2020 NWS Reno Weather Briefings

# Situational Awareness - When Should I Freak Out?

NWS Reno 7-14 Day Scan for Upcoming Weather across the Eastern Sierra and Western Nevada

| | Wed 11/11 | Thur 11/12 | Fri 11/13 | Sat 11/14 | Sun 11/15 | Mon 11/16 | Tues 11/17 | W2 11/18-24 |
|---|---|---|---|---|---|---|---|---|
| **Wind** | Mainly light and variable winds. | Slightly increased breeze late day. | Stronger winds likely with travel/rec impacts, but still some variability. Fri evening period looks strongest at this time. | | Lighter winds | | Next storm?? Mtn snow, valley rain. Lots of variability - some simulations have low end storms, while a few show high-end precip and wind scenarios. | Storm favored to continue into Wed or Thurs.. Afterward pattern gets more noisy so less confidence on storm potential next weekend. |
| **Snow** | A few light snow showers near Oregon border. Minimal impact. | Trending drier. | Periods of mountain snow, valley rain with maybe some snow. Still a bit of variability in scenarios, but heightened risk of mountain travel impacts from snow is pretty certain. | | A short break. | | | |
| **Fire Weather** | No concerns with higher fuel & soil moistures. | | | | | | | |
| **Flooding** | Nothing worrisome at this point. | | | | | | | |
| **Unusual Temps** | Cool day. | Still below normal but not as frigid at night. | | Warming to above average by Monday. | | | | Variable but leaning near/above norm. |
| **Air Stagnation** | Limited valley ventilation. | Limited ventilation most of the day. | Better ventilation with more wind overall. | | | | | TBD. |

**What Does This Mean?** Integrates impacts and confidence

| No worries | Low freakoutness | Moderate freakoutness | High freakoutness | Really bad |
|---|---|---|---|---|

A-087

Reno National Weather Service
Forecasting for the Sierra and western Nevada since 1905

# Situational Awareness - When Should I Freak Out?

**NWS Reno's 7-14 Day Scan for Upcoming Weather across the Eastern Sierra and Western Nevada**

| | Thur 11/12 | Fri 11/13 | Sat 11/14 | Sun 11/15 | Mon 11/16 | Tues 11/17 | Wed 11/18 | W2 11/19-25 |
|---|---|---|---|---|---|---|---|---|
| **Wind** | Slightly increased breeze late day. | Strong S/SW winds, esp I-80 northward. Travel impacts!! Possible fence, tree, power issues. Mainly Fri aftn-eve. | Winds slacken off quite a bit, mainly W/NW direction. | Almost non-existent winds. | | A touch more wind but normal stuff. | Southwest winds increasing again, potentially moderate. | Storm chances continue into Thursday.<br><br>Afterward pattern gets more noisy so less confidence. Some signs of storms the week of Thanksgiving... |
| **Snow** | Trending drier. | Mountain snow, valley rain mainly **Fri aftn-evening**. Travel impacts definite for passes. | A few residual snow showers, mainly near Ore border. Limited impact. | A break. | | | Mountain snow with valley rain looking possible. | |
| **Fire Weather** | No concerns with higher fuel & soil moistures. | | | | | | | |
| **Flooding** | Nothing worrisome at this point. | | | | | | | |
| **Unusual Temps** | Near to just below normal temps. | | | Above normal temps - enjoy! | | | Slightly cooler. | Variable but leaning near normal. |
| **Air Stagnation** | Limited ventilation most of the day. | Better ventilation with more wind overall. | | Airmass rather stagnant, esp Mon. | | Return of wind means better ventilation. | | TBD. |

**What Does This Mean?** Integrates impacts and confidence

| No worries | Low freakoutness | Moderate freakoutness | High freakoutness | Really bad |
|---|---|---|---|---|

A-088

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# Situational Awareness - When Should I Freak Out?

**NWS Reno's 7-14 Day Scan for Upcoming Weather across the Eastern Sierra and Western Nevada**

| | Fri 11/13 | Sat 11/14 | Sun 11/15 | Mon 11/16 | Tues 11/17 | Wed 11/18 | Thurs 11/19 | W2 11/20-26 |
|---|---|---|---|---|---|---|---|---|
| **Wind** | Strong S/SW winds, esp I-80 northward. Travel impacts!! Possible fence, tree, power issues. Mainly Fri aftn-eve. | Winds slacken off quite a bit, mainly W/NW direction. | Almost non-existent winds. | | South/southwest winds increasing, potentially moderate intensity with some travel impacts. Lower than normal certainty. | | | Pattern gets more noisy, less predictable. Some signs of storms the week of Thanksgiving... |
| **Snow** | Mountain snow, valley rain mainly **aftn-evening**. Travel impacts definite for passes. | A few residual snow showers, mainly near Ore border. Limited impact. | A break. | | | Mountain snow with valley rain looking possible. But again lower than normal forecast certainty with this storm. | | |
| **Fire Weather** | All good here. | | | | | | | |
| **Flooding** | Nothing worrisome at this point. | | | | | | | |
| **Unusual Temps** | Near to just below normal temps. | | Above normal temps - enjoy! | | | Cooler, a bit closer to normal. | | Variable but leaning near normal. |
| **Air Stagnation** | Better ventilation with more wind overall. | | Air mass rather stagnant, esp Mon. | | Return of wind means better ventilation. | | | TBD. |

**What Does This Mean?** Integrates impacts and confidence

| No worries | Low freakoutness | Moderate freakoutness | High freakoutness | Really bad |
|---|---|---|---|---|

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# Situational Awareness - When Should I Freak Out?

**NWS Reno's 7-14 Day Scan for Upcoming Weather across the Eastern Sierra and Western Nevada**

| | Sun 11/15 | Mon 11/16 | Tues 11/17 | Wed 11/18 | Thurs 11/19 | Fri 11/20 | Sat 11/21 | W2 11/22-28 |
|---|---|---|---|---|---|---|---|---|
| **Wind** | Light and variable winds. | | South/southwest winds, potentially strong intensity with travel impacts. | Breezy west/northwest winds. | Lighter northeast winds. | | Light and variable winds. | Pattern looks to remain active possibly thru Thanksgiving, but details are iffy as of now. |
| **Snow** | A few residual snow showers, mainly near Ore border. Limited impact. | A break. | Another round of mountain snow and light valley rain. Sierra passes likely impacted starting late in the day Tuesday. | | Some leftover scattered showers but low impact. | Another break. | | |
| **Fire Weather** | All good here. We have technically begun the "Off Season". Hooray! | | | | | | | |
| **Flooding** | Nothing worrisome at this point. Happy NV Flood Awareness Week! | | | | | | | |
| **Unusual Temps** | Above normal temps - enjoy! | | | Cooler, back to normal or slightly below. | | | Variable but leaning near normal. | Normal to below normal. |
| **Air Stagnation** | Air mass rather stagnant, esp Mon. | | Return of wind means better ventilation. | | Mixing and ventilation more limited. | | | Improved ventilation. |

**What Does This Mean?** Integrates impacts and confidence

| No worries | Low freakoutness | Moderate freakoutness | High freakoutness | Really bad |
|---|---|---|---|---|

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# Situational Awareness - When Should I Freak Out?

**NWS Reno's 7-14 Day Scan for Upcoming Weather across the Eastern Sierra and Western Nevada**

| | Mon 11/16 | Tues 11/17 | Wed 11/18 | Thurs 11/19 | Fri 11/20 | Sat 11/21 | Sun 11/22 | W2 11/23-29 |
|---|---|---|---|---|---|---|---|---|
| **Wind** | Light easterly winds. Gusty ridgetops. | Strong/ damaging south/southwest winds. Travel, aviation impacts expected. | Breezy west/northwest winds. | Lighter northeast winds. | | | Light and variable winds. | Pattern looks to remain active possibly thru Thanksgiving, but details are fuzzy as of now. Stay tuned. |
| **Snow** | Sno-way | Another round of mountain snow and light valley rain. Sierra passes likely impacted starting late in the day Tuesday. | | Scattered showers but low impact. | Break in the action for the most part. A few showers not out of the question Friday and Sunday. | | | |
| **Fire Weather** | No Concerns. | | | | | | | |
| **Flooding** | Nothing worrisome at this point. Happy NV Flood Awareness Week! | | | | | | | |
| **Unusual Temps** | Above normal temps - enjoy! | | Cooler, back to normal or slightly below. | | | Variable but leaning near average. | | Nothing unusual. |
| **Air Stagnation** | Lingering Stagnation. | Return of wind means better ventilation. | | Mixing and ventilation more limited. | | | | Improved ventilation. |

**What Does This Mean?** Integrates impacts and confidence

| No worries | Low freakoutness | Moderate freakoutness | High freakoutness | Really bad |
|---|---|---|---|---|

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# Situational Awareness - When Should I Freak Out?

**NWS Reno's 7-14 Day Scan for Upcoming Weather across the Eastern Sierra and Western Nevada**

| | Tues 11/17 | Wed 11/18 | Thurs 11/19 | Fri 11/20 | Sat 11/21 | Sun 11/22 | Mon 11/23 | W2 11/24-30 |
|---|---|---|---|---|---|---|---|---|
| **Wind** | Strong S-SW winds. Impacts air & ground travel. Tree, fence damage. Power issues. Dust. | Continued gusty W/SW winds with some localized travel impacts in prone spots. | Light and variable winds for the most part. | | | | Slight increase in SW winds. | Possibility for another storm remains next week but latest simulations are less robust. |
| **Snow** | Mountain snow with peak travel impacts Tues aftn-night. Passes a mess. Continued snow showers through Wednesday. | | Not seeing much interesting. | | | | | |
| **Flooding** | Periods of heavy rains Tues aftn-night NE Cal & Tahoe. Spot flooding poor drainage areas. Burns - enhanced runoff. | | Nothing of note. Nevada Flood Awareness Week continues. | | | | | |
| **Fire Weather** | No concerns - lots of moisture. | | | | | | | |
| **Unusual Temps** | Mild, but wind! | Cooler but fairly seasonable. | | | | | | |
| **Air Stagnation** | Return of wind means better ventilation. | | Mixing and ventilation more limited with light winds, inversions. | | | | | |

**What Does This Mean?** Integrates impacts and confidence

| No worries | Low freakoutness | Moderate freakoutness | High freakoutness | Really bad |
|---|---|---|---|---|

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