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February 21, 2020

## **DATA REQUEST RESPONSE**

**LIBERTY UTILITIES (CALPECO ELECTRIC) LLC**

**R.18-10-007**

**Wildfire Mitigation Plan Rulemaking**

Data Request No.: CalAdvocates-Liberty-2020WMP-01

Requesting Party: Public Advocates

Originator: Aaron Louie

Date Received: February 19, 2020

Due Date: February 24, 2020

### **REQUEST NO. 1:**

Please clarify how Liberty uses the terms “ignition” and “near miss” in Liberty’s 2020 Wildfire Mitigation Plan (and all associated data and metrics submitted to the Commission’s Wildfire Safety Division).

- a. Does Liberty use the term “ignition” as synonymous with “CPUC-Reportable Event”?<sup>1</sup>
- b. If the answers to question 1a is no, please provide Liberty’s definition of “ignition” as used in Liberty’s 2020 Wildfire Mitigation Plan (and all associated data and metrics submitted to the Commission’s Wildfire Safety Division).

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<sup>1</sup> D. 14-02-015, *Decision Adopting Regulations to Reduce the Fire Hazards Associated with Overhead Electric Utility Facilities and Aerial Communications Facilities*, issued February 5, 2014 in R.08-11-005, p. C-3: “CPUC-Reportable Event” means “any event where utility facilities are associated with the following conditions: (a) A self-propagating fire of material other than electrical and/or communication facilities, and (b) The resulting fire traveled greater than one linear meter from the ignition point, and (c) The utility has knowledge that the fire occurred. Ignition Point is the location, excluding utilities facilities, where a rapid, exothermic reaction was initiated that propagated and caused the material involved to undergo change, producing temperatures greatly in excess of ambient temperature.”

**RESPONSE TO REQUEST NO. 1:**

- a) Yes.
- b) Not applicable.

**REQUEST NO. 2:**

Please clarify how Liberty uses the term “near miss” in Liberty’s 2020 Wildfire Mitigation Plan (and all associated data and metrics submitted to the Commission’s Wildfire Safety Division),

- a) Does Liberty use “near miss” as defined in the December 16, 2019 WMP Guidelines?<sup>2</sup>
- b) If the answer to question 2a is yes, please explain how Liberty determines whether an event entails “significant probability of ignition.”
- c) If the answer to question 2a is no, please provide Liberty’s definition of “near miss” as used in Liberty’s 2020 Wildfire Mitigation Plan (and all associated data and metrics submitted to the Commission’s Wildfire Safety Division).

**RESPONSE TO REQUEST NO. 2:**

- a) No.
- b) Not applicable.
- c) Liberty defines near miss as any event that has a possibility of ignition, including wires down, contacts with objects, line slap, and other events that cause sparking or have potential to cause ignition. Liberty CalPeco does not have enough historical ignition events to reasonably define what constitutes a significant probability of ignition.

**REQUEST NO. 3:**

Please explain how Liberty distinguishes between an ignition and a “near miss.”

**RESPONSE TO REQUEST NO. 3:**

Liberty CalPeco categorizes any event that has the possibility of creating sparks or significant heat generation and has the potential to contact combustible material as a near miss, unless the event creates a CPUC-Reportable Event ignition; in which case it is categorized as an ignition.

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<sup>2</sup> *Administrative Law Judge’s Ruling on Wildfire Mitigation Plan Templates and Related Material and Allowing Comment*, R.18-10-007 December 16, 2019, Attachment 1, WMP Guidelines, (December 16, 2019 WMP Guidelines) p. 11.

“Near miss” means “An event with significant probability of ignition, including wires down, contacts with objects, line slap, events with evidence of significant heat generation, and other events that cause sparking or have the potential to cause ignition.”