



Liberty Utilities®

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DATA REQUEST RESPONSE

LIBERTY UTILITIES (CALPECO ELECTRIC) LLC

R.18-10-007

Wildfire Mitigation Plans Rulemaking

Requesting Party: SED
Date Received: March 7, 2019
Due Date: March 11, 2019

RISK ANALYSIS (Section 3.4):

REQUEST NO. 1:

Does Liberty gather data on the causes of each utility-caused ignition in its service area?

RESPONSE TO REQUEST NO. 1:

During a major ignition event (*e.g.*, 2016 Emerald Fire), sequence of events and protection are reviewed to ensure that all devices operated as anticipated, and the issue is isolated appropriately. There have only been two other known ignition events in Liberty CalPeco's service territory since taking ownership in 2011, and both were small and contained quickly. Liberty CalPeco does not have a tracking process for utility-caused ignitions

REQUEST NO. 2:

Does Table 3-2 on page 14 of the WMP only include data from events that were outage related? Does Liberty gather data on risk events in its system that are not related to or do not result in an outage?

RESPONSE TO REQUEST NO. 2:

Table 3-2 on page 14 of the WMP only includes outage-related risk events. During routine inspections, such as vegetation or G.O. 165, risk items and events are identified, prioritized, and resolved in accordance with CA G.O. 95 Rule 18. Risk events are also identified during normal operations or by customer reports. Outside of the aforementioned methods, risk events are not identified unless they are outage-related.

WILDFIRE PREVENTION STRATEGIES (Section 4)**REQUEST NO. 3:**

How does a Red Flag Warning change normal operational practices? What kind of responsive action does Liberty take? Does Liberty have any specific protocols that it implements during Red Flag Warnings?

RESPONSE TO REQUEST NO. 3:

Please refer to Liberty's Fire Prevention Plan, Operating Measures section. In addition to these measures, Vegetation Management activities may be halted/modified (depending on wind speed), construction activities may be limited and/or pump trucks placed on-site, and warnings will be discussed in crew tailboard meetings to ensure heightened crew awareness.

REQUEST NO. 4:

Has Liberty performed any analysis on vegetation maintenance patterns or its off-cycle tree work to identify areas that would benefit from a shorter maintenance cycle?

RESPONSE TO REQUEST NO. 4:

Liberty CalPeco's most recent analysis of the vegetation management program was performed by a third-party contractor in 2018. The study included a review of existing workload data, collection, and evaluation of tree species frequency data, analysis of maintenance frequency options, crew production analysis, specifications, and program processes and procedures. The program evaluation provided three potential maintenance program options. The recommended program option suggests an optimum cycle goal of three years.

REQUEST NO. 5:

How does Liberty determine the areas in its system where it would be appropriate to install covered conductor?

RESPONSE TO REQUEST NO. 5:

Liberty CalPeco not only prioritizes by High Fire Threat Districts, but also by the risk of wildfires created by the spans of bare primary overhead conductor that are within heavily forested and isolated areas of the service territory.

REQUEST NO. 6:

Liberty indicates that the majority of poles will require replacement in order to support new covered conductor. How many poles in Liberty's system are currently supporting bare wire that is to be replaced by covered conductor?

RESPONSE TO REQUEST NO. 6:

Liberty CalPeco is committed to Wildfire Mitigation and hopes to eventually replace all bare overhead primary conductor in its service territory with covered conductor. All poles currently supporting bare conductor, approximately 15,000 of the 23,134 total poles, will need to have pole-loading calculations completed in order to determine if they can support the covered conductor.

REQUEST NO. 7:

Is Liberty conducting any studies to determine areas for which underground conductor would be an appropriate wildfire mitigation strategy?

RESPONSE TO REQUEST NO. 7:

Yes, at this time Liberty CalPeco is focusing on isolated and heavily forested areas of the service territory that contain bare conductor. These areas are not conducive to undergrounding because of the environmental sensitivity of the areas they cross. As re-conductoring begins in more urban areas of the service territory, there may be better opportunities to underground conductors as part of the wildfire mitigation plan, and these will be reviewed accordingly.

REQUEST NO. 8:

Has Liberty identified gaps in situational awareness that would be mitigated by the installation of surveillance cameras?

RESPONSE TO REQUEST NO. 8:

As with any utility, the System Control center is typically many miles away from transmission and distribution facilities. Because of this, surveillance cameras would offer additional situational awareness for System Control operators. With a majority of the service territory being in heavily forested areas, a large number of cameras would be required to significantly increase situational awareness.