

Application No.: A.25-06-017
Exhibit No.: LIB-15



(U 933-E)

Mountain View Fire Cost Recovery Application

Exhibit LIB-15

Cal Advocates Response to Liberty DR 4



Public Advocates Office's Response to Data Request

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

Data request: Liberty-CalAdvocates-DR-004

Date of receipt: January 12, 2025

Response date: January 16, 2025

To: **Dan Marsh**
Liberty Utilities Email: Dan.Marsh@libertyutilities.com

Sharon Yang
Liberty Utilities Email: Sharon.Yang@libertyutilities.com

Giovanni Saarman Gonzalez
Munger, Tolles & Olson LLP Email: Giovanni.SaarmanGonzalez@mto.com

Sarah Cole
Munger, Tolles & Olson LLP Email: Sarah.Cole@mto.com

Kevin Allred
Munger, Tolles & Olson LLP Email: Kevin.Allred@mto.com

Matthew Linsley
Munger, Tolles & Olson LLP Email: Matthew.Linsley@mto.com

Danny Zhang
Munger, Tolles & Olson LLP Email: Danny.Zhang@mto.com

From: **Matthew Karle**
Program and Project Supervisor
Public Advocates Office Email: Matthew.Karle@cpuc.ca.gov

Travis Foss
Attorney
Public Advocates Office Email: Travis.Foss@cpuc.ca.gov

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

Matthew Karle
Program and Project Supervisor
Safety Policy Section, Safety Branch
Public Advocates Office
California Public Utilities Commission
505 Van Ness Avenue, San Francisco, CA 94102
matthew.karle@cpuc.ca.gov | Office: (415) 703-1850

REQUESTS

Request 1

In Cal Advocates' response to Liberty-CalAdvocates-DR-003, Question 2, Cal Advocates provided attachment "A.25-06-017 Liberty-CalAdvocates-DR-003_Q2_Walker_Fire_History.xlsx." This file appears to contain multiple rows referring to the same fire.

- a) Please confirm the following:
 - i. Whether Object IDs 9 and 38 refer to the same fire;
 - ii. Whether Object IDs 7 and 33 refer to the same fire;
 - iii. Whether Object IDs 8 and 34 refer to the same fire;
 - iv. Whether Object IDs 6 and 39 refer to the same fire;
 - v. Whether Object IDs 3 and 40 refer to the same fire; and
 - vi. Whether Object IDs 1 and 43 refer to the same fire.
- b) If the answer to any of subparts (a)(i)-(a)(vi) is yes, did Cal Advocates de-duplicate the Object IDs that refer to the same fire before plotting the Object ID in the known fire history maps in CA-03, Figures 3, 4, and 5 or did Cal Advocates plot each Object ID as a separate fire occurrence? If Cal Advocates did not perform de-duplication, why not?
- c) If Cal Advocates does not know the answer to any of subparts (a)(i)-(a)(vi), what, if anything, did Cal Advocates do to ensure that this spreadsheet did not contain any duplicate entries referring to the same fire?

Response:

- a) For "A.25-06-017 Liberty-CalAdvocates-DR-003_Q2_Walker_Fire_History.xlsx":
 - i. Yes, Object IDs 9 and 38 seem to refer to the same fire (different polygon size)
 - ii. Yes, Object IDs 7 and 33 seem to refer to the same fire (different polygon size)
 - iii. Yes, Object IDs 8 and 34 seem to refer to the same portion of the same fire complex (Object 34 substantially smaller).
 - iv. Yes, Object IDs 6 and 39 seem to refer to the same fire (different polygon size)
 - v. Yes, Object IDs 3 and 40 seem to refer to the same fire (different polygon size)
 - vi. Yes, Object IDs 1 and 43 seem to refer to the same fire (different initial date)
- b) No, Cal Advocates did not de-duplicate the Object IDs from Question 1a that refer to the same fires before plotting the Object IDs in the known fire history maps in CA-03,

Figures 3, 4, and 5. Cal Advocates did not perform a de-duplication on the spreadsheet “A.25-06-017 Liberty-CalAdvocates-DR-003_Q2_Walker_Fire_History.xlsx”, which was extracted directly from the combined dataset of historical fires without processing. An errata will be issued with updated Figures 3, 4, and 5.

- c) See Response to Question 1b.

Request 2

In CA-03, Cal Advocates stated that “[w]ildfire data from CAL FIRE and BLM are combined to form a dataset covering California and Nevada,” which it used as the data underlying Figures 3, 4, and 5. What, if anything, did Cal Advocates do to ensure its combined dataset of historical fires underlying CA-03, Figures 3, 4, and 5 did not contain any duplicate entries referring to the same fire recorded by both CAL FIRE and BLM?

- a) If yes, did Cal Advocates de-duplicate fires recorded by both CAL FIRE and BLM before plotting it in Figures 3, 4, and 5? If not, why not?

Response:

Cal Advocates had performed a de-duplication check on the CAL FIRE dataset: Object IDs do exist with the same name and initial date in the CAL FIRE dataset but refer to distinct non-overlapping fires, for example, in cases of fire complexes. Cal Advocates did not perform a de-duplication check on the merged California and Nevada dataset of fires from CAL FIRE and BLM. An errata will be issued with updated Figures 3, 4, and 5.

Request 3

In Cal Advocates’ response to Liberty-CalAdvocates-DR-003, Question 13, Cal Advocates stated that it “has done analyses of phase-to-phase or wire slap events reported by utilities other than Liberty.” Please provide all documents and/or workpapers related to Cal Advocates’ analysis of phase-to-phase or wire slap events reported by utilities other than Liberty.

Response:

Cal Advocates objects to this request on the basis that it is vague and ambiguous in terms of the duration and scope of the request. Further objection is made to the extent this request is unduly

burdensome in that it seeks any and all analysis without being limiting to a specific utility, geographical location or proceeding. Objection is made to the extent this request seeks information not relevant to the scope of this proceeding nor reasonably calculated to lead to the discovery of admissible evidence. Cal Advocates further objects to this request to the extent it seeks information protected by the deliberative process privilege, attorney work product doctrine, attorney-client privilege, or any other applicable privilege or protection. Cal Advocates met and conferred with Liberty's counsel on January 14, 2026 to discuss narrowing the request to target Cal Advocates' analysis of electric utilities between 2020 and 2023. Subject to that meeting and without waiving objections, Cal Advocates responds as follows:

After a good faith effort to undertake a diligent search for materials responsive to this data request, subject to the agreement reached at our January 14, 2026 meet and confer, Cal Advocates has not located any responsive documents. Cal Advocates will supplement this response should additional responsive material become available.

Request 4

In Cal Advocates' response to Liberty-CalAdvocates-DR-003, Question 14, Cal Advocates stated that it "has performed analyses of wire down events reported by utilities other than Liberty." Please provide all documents and/or workpapers related to Cal Advocates' analysis of wire down events reported by utilities other than Liberty.

Response:

Cal Advocates objects to this request on the basis that it is vague and ambiguous in terms of the duration and scope of the request. Further objection is made to the extent this request is unduly burdensome in that it seeks any and all analysis without being limiting to a specific utility, geographic location or proceeding. Objection is made to the extent this request seeks information not relevant to the scope of this proceeding nor reasonably calculated to lead to the discovery of admissible evidence. Cal Advocates further objects to this request to the extent it seeks information protected by the deliberative process privilege, attorney work product doctrine, attorney-client privilege, or any other applicable privilege or protection. Cal Advocates met and conferred with Liberty's counsel on January 14, 2026 to discuss narrowing the request to target Cal Advocates' analysis of electric utilities between 2020 and 2023. Subject to that meeting and without waiving objections, Cal Advocates responds as follows:

After a good faith effort to undertake a diligent search for materials responsive to this data request, subject to the agreement reached at our January 14, 2026 meet and confer, Cal Advocates has

located the following documents. Cal Advocates is providing links to where these documents are publicly available.

- Comments of the Public Advocates' Office on Pacific Gas and Electric Company's 2022 Risk Spend Accountability Report
 - <https://www.cpuc.ca.gov/-/media/cpuc-website/divisions/energy-division/documents/risk-spending-accountability-reports/2-cal-advocates-comments.pdf>
- Comments of the Public Advocates Office on Pacific Gas and Electric Company's 2023 Risk Spending Accountability Report
 - <https://www.cpuc.ca.gov/-/media/cpuc-website/divisions/energy-division/documents/risk-spending-accountability-reports/cal-advocates-comments-on-pge-2023-rsar.pdf>
- Comments of the Public Advocates Office on the 2023 to 2025 Wildfire Mitigation Plans of the Large Investor-Owned Utilities
 - <https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53966&shareable=true>
- Application 23-08-013 Thomas Fire and Debris Flow Cost-Recovery Application
 - CA-01 Executive Summary
 - <https://docs.cpuc.ca.gov/PublishedDocs/SupDoc/A2308013/7528/533189033.pdf>
 - CA-05 Testimony for Thomas Fire and Debris Flow CRA Circuit Risks
 - <https://docs.cpuc.ca.gov/PublishedDocs/SupDoc/A2308013/7528/533244184.pdf>
 - CA-08 Testimony on the Koenigstein Ignition
 - <https://docs.cpuc.ca.gov/PublishedDocs/SupDoc/A2308013/7529/533096626.pdf>
- Investigation 15-08-019
 - Opening Comments of the Public Advocates Office on the Administrative Law Judge's Ruling Providing the Final Northstar Report Update and the Safety Policy Division Staff Report
 - <https://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M497/K621/497621935.PDF>
 - Reply Comments of the Public Advocates Office on the Administrative Law Judge's Ruling Providing the Final Northstar Report Update and the Safety Policy Division

Staff Report

- <https://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M497/K964/497964315.PDF>

The above is not intended as an exclusive list. Cal Advocates will supplement this response should additional responsive material become available.