

Application No.: A.25-06-017  
Exhibit No.: LIB-17



(U 933-E)

## **Mountain View Fire Cost Recovery Application**

### **Exhibit LIB-17**

**Liberty CalPeco's Amended Response to  
DR CalAdvocates-LIB-A2506017-039**



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January 5, 2026

**Liberty Utilities (CalPeco Electric) LLC**

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

**The Public Advocates Office**

Data Request No.: CalAdvocates-LIB-A2506017-039  
Requesting Party: Public Advocates Office  
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Date Received: December 5, 2025  
Due Date: December 19, 2025  
Amended Response Date: January 5, 2026

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This data request relates to Liberty Utilities' Supervisory Control and Data Acquisition (SCADA, i.e. control room) and local protection data (i.e. data stored on the protective device) for its R2 recloser on Topaz 1261.

**REQUEST NO. 1:**

When did Liberty personnel in California first become aware of the transient fault (as described in Liberty 02: Ignition at 11) detected at the R2 recloser at 10:53 am on November 17, 2020?

**AMENDED RESPONSE:**

Liberty objects to this Question as vague, ambiguous, and overbroad as framed. Liberty further objects to this Question to the extent it requests information protected by the attorney-client

privilege or the attorney work product doctrine as part of Liberty's privileged investigation related to the Mountain View Fire. Subject to and without waiving its objections, Liberty responds as follows: Liberty was not aware on November 17, 2020 of the transient fault recorded by the 1261 R2 Recloser at approximately 10:53 a.m. that day. Liberty became aware of the fault based on subsequent review of data downloaded from the recloser after the incident. Those records indicate that the data was downloaded on November 18, 2020, and Liberty became aware of the fault at that time or within a few days when Liberty personnel reviewed the data.

**REQUEST NO. 2:**

When did personnel in Liberty's System Control Center in New Hampshire first become aware of the transient fault detected at the R2 recloser at 10:53 am on November 17, 2020?

**RESPONSE:**

Liberty objects to this Question as vague, ambiguous, and overbroad as framed. Subject to and without waiving its objections, Liberty responds as follows: See Liberty's response to Question 1 of this set of data requests.

**REQUEST NO. 3:**

Please provide all data sent to Liberty's SCADA system that relates to Liberty's R2 recloser on Topaz 1261 from November 16-18, 2020.

**RESPONSE:**

Liberty objects to this Question as vague and ambiguous as framed. Subject to and without waiving its objections, Liberty responds as follows: Liberty refers Cal Advocates to information previously provided to Cal Advocates, including attachment *1261R2\_INST\_AMPS.xlsx* provided in response to Question 1 of CalAdvocates-LIB-A2506017-034 (interval load data associated with 1261 R2 Recloser recorded in Liberty's SCADA historian system) and *LIB001836-1855* provided in response to Question 6 of CalAdvocates-LIB-A2506017-010 (event data from Liberty's SCADA system for Topaz 1261 Circuit).

**REQUEST NO. 4:**

Please provide all data from Liberty's R2 recloser on Topaz 1261 stored on the recloser from November 16-18, 2020.

**RESPONSE:**

Liberty objects to this Question as vague and ambiguous as framed. Subject to and without waiving its objections, Liberty responds as follows: Liberty refers Cal Advocates to information previously provided to Cal Advocates, including attachment *1261 Phase-to-Ground Waveforms.zip* provided in response to Question 1(c) of CalAdvocates-LIB-A2506017-013 (.cev files downloaded from 1261 R2 Recloser related to phase-to-ground faults on November 17, 2020) and *LIB001835* (1261 R2 Recloser event history), *LIB002156-LIB002172* (1261 R2 Recloser sequence of events), *LIB001826* (1261 R2 Recloser device information), *LIB001827-LIB001832* (1261 R2 Recloser settings) provided in response to Question 6 of CalAdvocates-LIB-A2506017-010. For additional data downloaded from the 1261 R2 Recloser, please see

*Attachment to CalAdvocates-LIB-A2506017-039, Q4.zip.* For information regarding adjusting timestamps for the 1261 R2 Recloser, please see Liberty's response to Question 1(d) of CalAdvocates-LIB-A2506017-013.

**REQUEST NO. 5:**

Has Liberty performed any analysis or investigation to determine the cause of the transient fault detected at the R2 recloser at 10:53 am on November 17, 2020? If so, please provide this analysis or investigation. If not, explain why Liberty did not investigate this transient fault.

**RESPONSE:**

Liberty objects to this Question as vague, ambiguous, and overbroad as framed. Liberty further objects to this Question to the extent it calls for documents protected by the attorney-client privilege, attorney work product doctrine, and/or other applicable privileges. Subject to and without waiving its objections, Liberty responds as follows: Liberty did not identify a location or cause of the transient fault recorded by the 1261 R2 Recloser at approximately 10:53 a.m. on November 17, 2020 in connection with its investigation related to the Mountain View Fire. As set forth in *Liberty-02: Ignition* (p. 11 n.13), the fault self-cleared and did not cause the recloser to operate.