

Docket	:	<u>A.25-06-017</u>
Exhibit Number	:	<u>CA-15</u>
Commissioner	:	<u>M. Baker</u>
Admin Law Judge	:	<u>R. Haga</u>
Witness	:	<u> </u>



**PUBLIC ADVOCATES OFFICE
CALIFORNIA PUBLIC UTILITIES COMMISSION**

CROSS EXHIBIT

**LIBERTY'S RESPONSE TO DATA REQUEST
CALADVOCATES-LIB-A2506017-022,
OCTOBER 17, 2025**

San Francisco, California
February 9, 2026



Liberty Utilities (CalPeco Electric) LLC
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October 17, 2025

Liberty Utilities (CalPeco Electric) LLC

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

The Public Advocates Office

Data Request No.: CalAdvocates-LIB-A2506017-022
Requesting Party: Public Advocates Office
Originator: Tyler Holzschuh, Tyler.Holzschuh@cpuc.ca.gov
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Cal Advocates Wildfire Discovery
CalAdvocates.WildfireDiscovery@cpuc.ca.gov
Date Received: October 3, 2025
Due Date: October 17, 2025

This data request pertains to the tension on the conductors between the East and West Poles (as depicted in Liberty's Application, Exhibit Liberty-02: Ignition at page 2).

REQUEST NO. 1:

What was the tension (in pounds or Newtons) on each conductor (including neutral and secondary conductors) between the East and West Poles as of 12:01 am of November 17, 2020?

RESPONSE:

Liberty is not aware of any records that would document the specific tension of these conductors as of 12:01 a.m. on November 17, 2020.

REQUEST NO. 2:

What tension (in pounds or Newtons) was applied to each conductor during the construction "one mile northwest of the Specific Facilities" (as mentioned in Liberty's Application, Exhibit

Liberty-03: Prudence of Operations at pages 17, 18) on the Topaz 1261 circuit on the morning of 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: Field personnel would have tensioned the conductors consistent with the Topaz Line Rebuild Phase Five design specifications and Liberty's overhead construction standards. See documents previously provided in response to CalAdvocates-LIB-A2506017-018, Questions 3 and 5. Liberty is not aware of any separate records that would document the specific tension applied by field personnel to each conductor during the reconductoring work on the Topaz 1261 Circuit on the morning of November 17, 2020.

REQUEST NO. 3:

What tension (in pounds or Newtons) was applied to each conductor when Liberty Utilities removed the slack on the Topaz 1261 circuit around 10:00 a.m. on November 17, 2020 (as described in Liberty's Application, Exhibit Liberty-02: Ignition at page 11)?

RESPONSE:

Liberty objects to this Question as vague and ambiguous as framed. Subject to and without waiving its objections, Liberty responds as follows: Liberty is not aware of any records that would document the specific tension applied by field personnel when they removed slack on November 17, 2020 from a stretch of the Topaz 1261 Circuit in hot arms where the reconductoring work was being performed that day. Liberty understands that field personnel decided to remove slack following the outage because this specific section of the line was in a different configuration and not at its usual tension as a result of spreading from the hot arms in place during Phase Five of the Topaz Line Rebuild.

REQUEST NO. 4:

Please provide all documentation for construction or inspection that relates to Liberty Utilities' removal of the slack on the Topaz 1261 circuit around 10:00 a.m. on November 17, 2020 (as described in Liberty's Application, Exhibit Liberty-02: Ignition at page 11).

RESPONSE:

Liberty objects to this Question as vague and ambiguous as framed. Subject to and without waiving its objections, Liberty responds as follows: Please see *CONFIDENTIAL-Attachments to CalAdvocates-LIB-A2506017-022, Q4.zip*.

REQUEST NO. 5:

Please provide the following dates:

- a) When the East Pole was installed;
- b) When the West Pole was installed;
- c) When each of the primary conductors between the East and West Poles was installed; and

- d) When the primary (or common) neutral conductor between the East and West Poles was installed.

RESPONSE:

Liberty objects to this Question as vague and ambiguous with respect to timeframe. Liberty understands this Question to be asking about the poles and conductors in place as of November 17, 2020. Subject to and without waiving its objections, Liberty responds as follows:

- a) Liberty's records indicate that the East Pole was installed in approximately 1947.
- b) Liberty's records indicate that the West Pole was installed in approximately 2000/2001.
- c) Liberty did not separately track historical conductor installation dates. Liberty was in the process of proactively rebuilding the Topaz 1261 Circuit at the time of the Mountain View Fire (see *Liberty-03: Prudence of Operations*, pp. 17-18), and Liberty has not located records indicating that it had previously replaced the primary conductors between the East and West Poles after Liberty acquired the utility from NV Energy in approximately 2011.
- d) Liberty did not separately track historical neutral installation dates. Liberty was in the process of proactively rebuilding the Topaz 1261 Circuit at the time of the Mountain View Fire (see *Liberty-03: Prudence of Operations*, pp. 17-18), and Liberty has not located records indicating that it had previously replaced the neutral between the East and West Poles after Liberty acquired the utility from NV Energy in approximately 2011.