

Docket	:	<u>A.25-06-017</u>
Exhibit Number	:	<u>CA-19</u>
Commissioner	:	<u>M. Baker</u>
Admin Law Judge	:	<u>R. Haga</u>
Witness	:	_____



**PUBLIC ADVOCATES OFFICE
CALIFORNIA PUBLIC UTILITIES COMMISSION**

CROSS EXHIBIT

**LIBERTY UTILITIES (CALPECO ELECTRIC) LLC (U 933-E) RESPONSE TO ELECTRIC SAFETY AND RELIABILITY
BRANCH SUBSTATION AUDIT FINDINGS (SA016-005)**

San Francisco, California
February 9, 2026



September 2, 2016

To: Fadi Day, P.E.
Program and Project Supervisor
Electric Safety and Reliability Branch
Safety and Enforcement Division
California Public Utilities Commission

Cc: Elizaveta Malashenko, Director, Safety and Enforcement Division, CPUC
Charlotte TerKeurst, Program Manager, Electric Safety and Reliability Branch, CPUC
Ivan Garcia, Utilities Engineer, CPUC

Liberty Utilities (CalPeco Electric) LLC (U 933-E) Response to Electric Safety and Reliability Branch Substation Audit findings

Liberty Utilities (CalPeco Electric) LLC (U 933-E) (“Liberty Utilities”) provides this response to the Substation Audit findings provided by the Electric Safety and Reliability Branch of the California Public Utilities Commission following the audit conducted from July 19th, 2016 to July 21, 2016.

I. Liberty Utilities Responses to Specific ESRB Audit Findings

ESRB Finding 1

GO 174, Rule 31, Frequency, states:

31.1 Substations shall be inspected as frequently as necessary.

- Time intervals or other bases shall be specified in the Inspection Program*

Liberty Utilities Substation Inspection Program states that all Substations will be inspected on a quarterly basis in 2015. Liberty Utilities did not inspect the Hobart Substation in Quarter 3 (due 9/30/2015) and Quarter 4 (due 12/31/2015). In addition, Liberty Utilities did not inspect the Stampede Substation in Quarter 1 (due 3/31/2015), Quarter 2 (due 6/30/2015) and Quarter 4 (due 12/31/2015).

LIBERTY UTILITIES RESPONSE TO ESRB FINDING 1

Due to the remote locations and hazardous conditions of the access roads during months when the region receives heavy precipitation, Hobart and Stampede quarterly substation inspections have been missed. In light of these challenges coupled with the lack of significant substation equipment to be inspected and non-critical loads served by these two substations, Liberty Utilities has amended the Substation Inspection Program. Effective July 1, 2016, Liberty Utilities will inspect Hobart and Stampede substations on an annual basis during the second or third quarter of each year as weather permits, or issues necessitate.



ESRB Finding 2

GO 174, Rule 33.1, Records, states:

Electronic or hard copy records of completed Inspections shall include, at a minimum:

- *Inspector name or identification*
- *Inspection date*
- *Brief description of identified discrepancies*
- *Condition rating (where applicable)*
- *Scheduled date of corrective action (where applicable)*

Liberty Utilities does not document the scheduled date of corrective actions as a result of its substation inspections or trouble calls.

LIBERTY UTILITIES RESPONSE TO ESRB FINDING 2

Liberty Utilities is developing a process whereby identified discrepancies will be evaluated by the Operations Manager and Regional Engineer, prioritized, and scheduled to be corrected by qualified personnel. Quarterly meetings will be held and documented in order to track and discuss discrepancies, progress of corrective actions, and any necessary follow up items.

ESRB Finding 3

GO 174, Rule 12, General, states in part:

Substations shall be designed, constructed and maintained for their intended use, regard being given to the conditions under which they are to be operated, to promote the safety of workers and the public and enable adequacy of service.

Stateline Substation

- The newer green fence in the substation was not grounded.
- There was corrosion on Battery #12.

LIBERTY UTILITIES RESPONSE TO ESRB FINDING 3



The new green metal fence at Stateline substation will be grounded in the spring of 2017. The Stateline substation requires new footings to be poured prior to installing a replacement circuit switcher, which will be accomplished in the spring of 2017. Grounding of the fence will be accomplished in conjunction with the preparation work for the new circuit switcher.

The corrosion on Battery #12 will be cleaned during the annual battery inspection and testing in the fourth quarter of 2016.

ESRB Finding 4

GO 174, Rule 12, General, states in part:

Substations shall be designed, constructed and maintained for their intended use, regard being given to the conditions under which they are to be operated, to promote the safety of workers and the public and enable adequacy of service.

Brockway Substation

- B and C phase lightning arrestors for Transformer #2 were damaged
- Broken bell on north bus of Capacitor Bank #2
- Abnormal sound patterns heard on Transformer #2
- Evidence of oil seepage on Transformer #1 and Circuit Breaker 5200

LIBERTY UTILITIES RESPONSE TO ESRB FINDING 4

The chipped B and C phase lightning arrestors on transformer #2 have been sealed. This is an industry standard corrective action for chipped or cracked porcelain insulators. Liberty Utilities will continue to monitor the condition of the lightning arrestors until the Brockway substation is de-commissioned in 2017-2018.

Liberty Utilities will schedule the broken bell on the north bus of capacitor bank #2 to be replaced. The potential for adverse weather during winter months can make it very difficult to accomplish scheduled work between November and March. Additionally, Liberty Utilities is a winter peaking system and may not be able to take outages that would be required to perform certain repair activities. For these reasons, Liberty Utilities will schedule and accomplish the repair to the broken bell within the next nine months.

Liberty Utilities will continue to perform dissolved gas analysis (DGA) sampling on the Brockway transformers and monitor the abnormal sound patterns from Transformer #2 until the Brockway substation is de-commissioned in 2017-2018.



The oil seepage on transformer #1 and circuit breaker 5200 are minor leaks. Liberty Utilities will continue to monitor that these leaks do not worsen and that proper oil levels are maintained for safe operation until the Brockway substation is de-commissioned in 2017-2018.

ESRB Finding 5

Kings Beach Substation

- Circuit Breaker 625A was leaking air from the plumbing between the air tank and air valve
- Circuit Breaker 650 bushing #4 was leaking oil from the seal between the upper porcelain and the bushing flange
- A broken and exposed underground cable splice box was found near Circuit Breaker 625A

LIBERTY UTILITIES RESPONSE TO ESRB FINDING 5

The 625 circuit breaker air leak will be scheduled for maintenance after the current outage on the 650 line has been completed in the fall of 2016. The maintenance will be completed within the next nine months.

The 650 circuit breaker bushing leak underwent maintenance in September of 2015. It was identified as requiring a new bushing in order to stop the leak. With the de-commissioning of the Brockway substation and rebuild of the Kings Beach substation, this circuit breaker will be replaced in 2017-2018. Liberty Utilities will continue to monitor the leak and bushing oil level.

The broken cable splice box will be scheduled for replacement in conjunction with the work performed on the 625 circuit breaker air leak in the fall of 2016.

ESRB Finding 6

Meyers Substation

- Broken bells on Regulator #3, C switch
- Broken bells on Circuit Breaker 3400
- Broken disconnects on Circuit Breaker 3500



- Switchboard lights on control panel not working for the capacitor bank
- The control panel for Regulator #2 is broken

LIBERTY UTILITIES RESPONSE TO ESRB FINDING 6

The broken bells on Regulator #3 C switch are part of the switch. This type of KPF switch has been discontinued since approximately 1990. Support and replacement parts are unavailable. As a result, the entire switch needs to be replaced. We are working with manufacturers to find and order a suitable replacement.

The broken bells on circuit breaker 3400 are also part of an old KPF switch that will need replacement. The design and replacement work will be scheduled as soon as a replacement switch has been identified.

The broken disconnects on circuit breaker 3500 will be scheduled for replacement to be accomplished within the next nine months. The new disconnects have already been ordered and were received as of August, 2016.

Qualified substation personnel will be contracted to investigate and correct the issue with the switchboard lights on the control panel for the capacitor bank. This work will be performed in conjunction with Meyers and Stateline relay testing due in September, 2016.

The control panel for regulator #2 does not track or show operations of the regulator. The display appears to be broken or illegible. This discrepancy will be investigated, and corrected if possible, in September 2016, when the relays and capacitor bank control lights are also being maintained.

II. Conclusion

Liberty Utilities thanks the Safety and Enforcement Division for the opportunity to address these Substation Audit findings and allow Liberty Utilities to continue its commitment to safety.

Please do not hesitate to contact me at Jeremy.Vanyi@libertyutilities.com with any questions regarding this Response.



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