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Commissioner	:	M. Baker
Admin Law Judge	:	R. Haga
Witness	:	M. Karle

PUBLIC ADVOCATES OFFICE
CALIFORNIA PUBLIC UTILITIES COMMISSION

TESTIMONY ON PRUDENCE OF OPERATIONS FOR MOUNTAIN VIEW FIRE COST-RECOVERY APPLICATION

Executive Summary

San Francisco, California
December 12, 2025

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EXECUTIVE SUMMARY

I. INTRODUCTION

This exhibit pertains to the application of Liberty Utilities (CalPeco Electric) LLC, ("Liberty") to recover from its customers costs associated with the Mountain View Fire (Application 25-06-017).

The Mountain View Fire, which ignited on November 17, 2020, burned 20,385 acres, mostly in Mono County, resulted in one fatality, and destroyed at least 90 structures.[1] The Mountain View Fire ignition occurred when a fallen energized conductor made contact with dried grasses in a field near Walker, CA.

Liberty seeks to recover approximately $78.2 million recorded to its Wildfire Expense Memorandum Account (WEMA) as of May 31, 2025, including approximately $11.5 million in future financing costs.[2] If the Commission adopts Liberty's proposed WEMA cost recovery on top of the rate increases proposed in Liberty's 2025 GRC, Liberty forecasts a cost increase for Liberty's non-CARE permanent Residential customers of 52.0% more per month on average, an increase of $103.54. Residential CARE customers would face an average monthly bill increase of 36.9%, or $54.41.

This exhibit is an executive summary of the prepared testimony served by the Public Advocates Office at the California Public Utilities Commission (Cal Advocates). This exhibit briefly describes the main findings that Cal Advocates' expert witnesses present in Exhibits CA-02 through CA-11.

Cal Advocates' other exhibits provide the factual citations and supporting analysis that undergird this summary.

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[1] CAL FIRE 2020 Fire Siege Report, last accessed December 11, at 10. < https://34c031f8-c9fd-4018-8c5a-4159cdff6b0d-cdn-endpoint.azureedge.net/-/media/calfire-website/our-impact/fire-statistics/2020-fire-siege.pdf?rev=80330d3b3d2e4216bf66e684c7784ad3&hash=ADFD85D92AA9DDBCAC1826F67F8DFFAB>.

[2] Exhibit (Ex.) Liberty-07, at 1.

II. EXHIBIT CA-02: MOUNTAIN VIEW FIRE IGNITION

Exhibit CA-02 reviews the California Department of Forestry and Fire Protection (CAL FIRE) report and other available evidence regarding the cause of the Mountain View Fire ignition, and provides a timeline of events on the day of the ignition.

The Mountain View Fire was first reported via 911 call on November 17, 2020 at 11:58 a.m. near the town of Walker in Mono County, California.[3] The ignition took place in a grassy field between two Liberty owned distribution poles.

A day later on November 18, 2020 CAL FIRE's investigator examined the ignition site, and concluded that "the most probable cause of the fire was ignition of cured annual grasses, due to a spark from a down, energized conductor contacting the ground."

Available evidence reviewed by Cal Advocates supports CAL FIRE's conclusion. CAL FIRE's investigator found pieces of broken conductor and indicators of fire spread consistent with a broken conductor igniting the dry vegetation in the grassy field. Liberty's recloser activity supports CAL FIRE's conclusion. On the morning of the ignition, there were three phase-to-phase faults consistent with wire slap, followed by a phase-to-ground fault consistent with a fallen conductor. The third phase-to-phase fault caused the conductor to break and fall, causing the phase-to-ground fault. This recloser activity is examined in detail in Exhibit CA-06.

Liberty has presented no plausible alternative theory for the cause of the ignition. In fact, Liberty states that "neither the fire agency investigation nor Liberty's own investigation identified significant evidence showing an alternate cause of the Mountain View Fire."[4]

III. EXHIBIT CA-03: LOCAL EXTERNAL FACTORS

Exhibit CA-03 describes the context of wildfire risk in the area where the Mountain View Fire ignited. Cal Advocates presents information about the local geographical features and wildfire risk factors affecting the area surrounding the Topaz

[3] Ex. Liberty-02 at 1.

[4] Ex. Liberty-02 at 1.

1261 distribution circuit. Environmental risks are illustrated with maps and data visualizations of High Fire Threat Districts (HFTD), fire scar history, Red Flag Warning (RFW) days, weather station wind gust data, precipitation history, and previous circuit outage incidents that occurred during RFWs.

The Topaz circuit, including the Topaz 1261 R2 recloser and the Mountain View Fire ignition area in the City of Walker, is located within HFTD Tier 2, which is designated as an area with "elevated risk" of wildland fire.

Using historical wildfire perimeter data from CAL FIRE and from the U.S. Bureau of Land Management's Nevada Fire and Aviation program, Cal Advocates presents maps of wildfire frequency in the area within Liberty's service territory and locally around the Mountain View Fire. Within Liberty's service territory, the region around Walker is one of two "hotspots" with the most wildfires (the other hotspot is north of Lake Tahoe). While the Mountain View Fire burn scar itself had not previously burned since the Jackass Fire in 2006 on the California-Nevada border, areas near the ignition site in Walker had experienced up to five wildfires in the past. Of particular concern was the Slink Fire, which burned 26,752 acres and threatened the cities of Coleville and Walker until it was contained on November 13, 2020, just four days before the Mountain View Fire started.

The National Weather Service is responsible for issuing RFWs that indicate times of increased fire danger from the expected combination of fast winds and dry weather. Cal Advocates provides a map showing that National Weather Service forecast zone NVZ421 received one of the highest numbers of RFWs among forecast zones in its vicinity for the year 2020. From 2016 to November 16, 2020, the National Weather Service issued 46 RFWs for the Mountain View Fire forecast zone. Cal Advocates presents data on the dates and duration of each of these 46 RFWs, as well as summary data by year.

Cal Advocates compares the recorded wind gust measurements from weather stations near the ignition area on the morning of the Mountain View Fire ignition with wind gusts recorded during each RFW period in 2020. The wind gust speeds on

November 17, 2020 steadily increased throughout the morning and exceeded most wind gust speeds from all RFW that year.

Using modeled precipitation data from the National Weather Service's National Operational Hydrologic Remote Sensing Center and from Oregon State University's PRISM Climate Group, Cal Advocates presents maps and charts of cumulative precipitation within Liberty's service territory. These maps show that the valley region around Walker to Topaz Lake received noticeably less precipitation than the surrounding mountain regions in the months prior to the Mountain View Fire. Snow cover mentioned by Liberty in its testimony had quickly melted within a few days.

Cal Advocates presents data about outages on the Topaz circuit in the five-year period prior to the Mountain View Fire (2016 to November 16, 2020). Liberty recorded 129 outages, of which 41 were planned. Out of the remaining 88 unplanned outages, six occurred during RFW events. Cal Advocates presents a map of the Topaz circuit that identifies the locations of the outages.

In sum, Exhibit CA-03 shows that the geographical area where the Mountain View Fire ignited was characterized by elevated wildfire risk, with heightened conditions on November 17, 2020, and this was known or knowable by Liberty before the Mountain View Fire. The area surrounding Walker and the Topaz circuit was designated as risky on the Commission's official HFTD maps. The areas around the Mountain View ignition sites had been affected by previous wildfires, including a large wildfire that was only recently contained. The Topaz circuit was also frequently affected by RFWs, and in the hours before the ignition wind gust speeds measured by Liberty's weather stations proximate to the ignition site were faster than RFW periods. Walker Valley receives less precipitation than other portions of Liberty's service territory, such that moisture conditions for Lake Tahoe and other areas should not also be ascribed to the area of the Mountain View Fire. Finally, Liberty's records show that the Topaz circuit experienced 129 planned and unplanned outages in a five-year period prior to the Mountain View Fire.

IV. EXHIBIT CA-04: SITUATIONAL AWARENESS

Exhibit CA-04 presents information about Liberty's situational awareness programs. Cal Advocates will demonstrate that on the day of the Mountain View ignition, Liberty based operational decisions on forecasted weather, and did not respond to actual weather conditions that were observable using Liberty's own weather stations and operational dashboard.

At the time of the Mountain view ignition, Liberty had deployed about one weather station for every 23.9 miles of overhead distribution line, including three on the Topaz circuit. Liberty's weather station penetration was comparable or better than that at peer utilities, but Liberty did not address the increasingly hazardous weather and fuel moisture conditions developing in Walker on the day of the ignition.

As established in Exhibit CA-03, at the time of the Mountain View ignition wind gust speeds at the three closest weather stations to the ignition site had exceeded those recorded during most of the 17 RFW events that had occurred over the course of 2020. Fuel moisture levels and relative humidity measurements were at or above the threshold for a RFW event. However, Liberty presented no evidence that it responded to these indicators of deteriorating conditions.

Further, the forecast data used by Liberty to guide its operational decision making was flawed. Liberty claims that staff used its fire weather dashboard to monitor forecasted weather conditions, however Liberty was unable to explain erratic and sometimes missing dashboard data related to forecasts of wind gust speeds, the Fosberg Fire Weather Index, and Energy Release Component. Liberty stated that it used the forecast fire weather dashboard data in determining its response to wildfire risk.

As Cal Advocates will show in Exhibit CA-06, Liberty had just over two hours between the initial wire slap event and phase-to-phase fault on the Topaz circuit, and the eventual ignition. Liberty had both the time to change course and the real time weather data available to operational staff indicating that a correction was necessary. Instead of heeding the real time data showing worsening conditions, Liberty behaved as though fire danger was minimal based on forecast data.

V. EXHIBIT CA-05: PREVENTATIVE MEASURES FOR WILDFIRE RISK

Exhibit CA-05 presents information about Liberty's practices and operations relating to its Public Safety Power Shutoff (PSPS) program and decision making. On the day of the Mountain View ignition, Liberty did not proactively de-energize the Topaz 1261 circuit. Liberty made this decision based entirely on forecast weather, and did not revisit the decision even as real conditions showed increasing wildfire risk.

By contrast, Southern California Edison Company (SCE) looked at similar risk conditions the morning of November 17th and made the decision to proactively de-energize two Mono County circuits, the nearest of which was the Tufa circuit located about 35 miles from the Mountain View ignition site. SCE de-energized the Tufa circuit at 7:45 a.m., at which time it was experiencing sustained winds at 26 mph, and gusts up to 38 mph. About an hour later at 8:41 a.m., SCE de-energized a second Mono County circuit, Cain Ranch, which was experiencing sustained winds at 28.8 mph, and gusts up to 56.2 mph. SCE's observed wind speeds at de-energization were comparable to those impacting the Topaz 1261 circuit on the morning of November 17th.

SCE ultimately de-energized 10 circuits in Kern, Mono, Los Angeles, and Inyo counties on November 16th and 17th, 2020. For most circuits, SCE's PSPS threshold at the time was 31 mph for sustained wind and 46 mph for wind gust speeds. The nearest weather station to the Mountain View ignition site measured wind speeds of 30.1 mph and wind gust speeds of 60.5 mph just before the ignition. Had Topaz 1261 been an SCE circuit, under these conditions it would have met SCE's criteria for de-energization.

Further, three of the SCE circuits de-energized on November 16th and 17th were what it calls "outage informed circuits," which SCE defines as circuits with "history of local circuit outages at lower wind speeds."[5] For these outage prone circuits, SCE used even lower wind speed and wind gust speed thresholds. Liberty did the opposite. Liberty states that the PSPS zone including the Topaz circuit was "windier than other PSPS zones under normal weather conditions" and that as a result Liberty's PSPS protocol

[5] See Ex. CA-05, II B.

"established slightly higher thresholds for wind gusts and [Fire Weather Index]."[6] Because the Topaz 1261 circuit was prone to high winds and wind driven outages, Liberty intentionally set the PSPS threshold for the circuit *higher* than other less outage prone Liberty circuits.

In the four-year period prior to the Mountain View ignition, Liberty identified at least 21 outages on the Topaz 1261 circuit likely to have been caused by wire slap under windy conditions. Liberty's 2019 GRC noted that the Topaz 1261 circuit is "located in an area that frequently experiences high winds and freezing temperatures," that these condition had caused "significant damage to the conductors" which "tend to break under the strain of ice and wind and exacerbate the deficiency of proper wire sag between poles causing the lines to be repeatedly spliced back together."[7]

Operational staff at Liberty's New Hampshire control center were not monitoring FPI or PSPS criteria, and were instead reliant on California based staff monitoring Liberty's fire weather dashboard forecasts and conveying operational decisions to control staff in New Hampshire. Liberty claims that its fire weather dashboard would alert California based staff when forecast conditions approach or exceed de-energization thresholds. However, in the days leading up the ignition all three of Liberty's PSPS protocol decision criteria were incorrectly displayed on the dashboard, either using incorrect thresholds or simply not displaying when thresholds were exceeded.

In determining whether to initiate a PSPS event, Liberty unquestioningly used a forecasting tool that was not properly calibrated. Liberty did not use the real-time information that was available to it from its own weather stations. Had it done so, it would have known that conditions on the morning of November 17, 2020 were consistent with serious wildfire risk.

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[6] Ex. Liberty-03 at 39

[7] Liberty Utilities 2019 General Rate Case (A.18-12-001), Chapter 2: Capital, November 30, 2018 at 6.

VI. EXHIBIT CA-06: FAULTS AND RECLOSER ACTIVITY

Exhibit CA-06 presents a timeline and analysis relating to faults and recloser activity on Liberty's Topaz 1261 circuit leading up to the 11:55 am ignition.

On the day of the Mountain View ignition, Liberty reports several consecutive faults on the Topaz 1261 circuit. At 9:48 a.m., a phase-to phase fault tripped the R2 1261 Topaz Recloser. Because of construction underway on the circuit that morning, Liberty's reclosers were set to hotline tag or fire mode, resulting in the line de-energizing after the fault.

Liberty subsequently patrolled the circuit, and at 10:41 a.m. re-energized the line. Because the construction on the circuit was complete, Liberty made the decision to turn off fire mode when the line was re-energized, and set the R2 1261 Topaz Recloser to normal mode. Twelve minutes later, at 10:53 a.m. Liberty's SCADA records indicate a second phase-to-phase fault. This second fault was not of sufficient magnitude to trip the recloser, and Liberty took no action in response.

At 11:55 a.m., a third phase-to-phase fault took place, followed almost immediately by a phase-to-ground fault. This indicates that Liberty's conductors made contact as a result of line slap, and that the resulting fault caused the conductor to melt. It then fell to the ground while still energized, causing the phase-to-ground fault.

Because Liberty's recloser was set to normal mode, it attempted to re-energize the line twice before locking out and de-energizing the circuit. Each attempt to re-energize resulted in the energized conductor making contact with grassy vegetation, which caused the ignition.

Once again, Liberty did not respond to the actual conditions on the day of the ignition. Liberty should have recognized the increasing wildfire risk, and made the decision to keep its reclosers in fire mode after the first fault. Instead, it proceeded as though the risk did not exist. Liberty should have responded to the second fault, twelve minutes after resetting the recloser to normal mode, by returning the recloser to fire mode. If hot line mode had been active at the time of the third fault, the Mountain View ignition could have been prevented.

VII. EXHIBIT CA-07: INSPECTIONS AND MAINTAINENCE

Exhibit CA-07 presents information about Liberty's inspections and maintenance programs. Cal Advocates will demonstrate that from the moment of Liberty's purchase of its electric assets from NV Energy in 2011, Liberty has demonstrated poor recordkeeping practices and treated urgently needed repairs with a lack of urgency.

In response to Cal Advocates' discovery, Liberty was unable to demonstrate that it undertook any comprehensive review of its electric assets prior to purchasing the assets from NV Energy. Liberty was not able to substantiate that it evaluated the accuracy or completeness of NV Energy's records for the Topaz 1261 circuit at or before the time of the acquisition.

In fact, Liberty was not able to demonstrate that it had at any point performed a full review of the condition of assets on the Topaz 1261 circuit until it performed a comprehensive asset survey between April and August 2020. In the 2020 asset survey, crews conducted 1,352 detailed inspections on the Topaz 1261 circuit, and only 59% of those assets received a passing grade. The 2020 asset survey documented 693 corrective findings on the Topaz circuit. It is unclear how long many of those corrective findings had been unaddressed. Between purchasing the assets in 2011 and the 2020 asset survey, Liberty operated its distribution system for nearly a decade without assurance that it was safe to operate.

General Order 165 requires that utilities conduct a patrol inspection of circuits such Topaz 1261, at minimum, every two years. In response to Cal Advocates discovery, Liberty was only able to produce patrol inspection records for 2013, 2015, and 2017. Liberty produced no records showing that any patrol inspections were performed on the Topaz 1261 circuit in the period between 2017 and the 2020 comprehensive asset survey. The patrol inspection records that Liberty produced for 2013, 2015, and 2017 identified no corrective work performed on the circuit. It is unlikely that the conditions underlying the 693 corrective findings in Liberty's 2020 asset survey all occurred after Liberty's last documented patrol in 2017.

The Topaz 1261 circuit is located in HFTD Tier 2, and is known to have been exposed to persistent high winds. Liberty's 2019 GRC demonstrates that Liberty was aware that conductor on the circuit "tend to break under the strain of ice and wind."[8] And, Topaz 1261 was known to be one of Liberty's least reliable circuits, with the highest or second highest System Average Interruption Duration Index (SAIDI) of Liberty's circuits in every year between 2015 and 2020.

Liberty's internal processes obscured safety risks. Corrective findings of major defects such as "Pole Cracked" and "Pole Needs Replaced" were reported on the same record as minor issues like "Idle Hardware" or "High Voltage Sign Problem," with all conditions assigned a single priority level and a single correction timeline. Liberty routinely missed GO 95 corrective action deadlines, provided no records of GO 95 Rule 18 due date extensions or log showing when extensions were granted, and performed no formal quality assurance or quality control review of inspection data.

Liberty had every reason and opportunity to know that under high wind conditions the Topaz 1261 circuit could pose an urgent ignition risk. Liberty's lack of adherence to industry standard inspection and maintenance practices all but ensured that deteriorating asset conditions would go undetected and uncorrected, and made an ignition like the Mountain View ignition almost inevitable.

VIII. EXHIBIT CA-08: DESIGN AND CONSTRUCTION

Liberty's Topaz 1261 circuit had an extensive history of phase-to-phase contacts and other outages. This indicates that the line was not in compliance with General Order 95's clearance requirements, which were in place both at the time when the circuit was constructed and at the time of the Mountain View fire ignition. Further, the extensive history of wire slap seems to indicate that Liberty's power line tensioning was insufficient.

Liberty also could not produce records indicating that proper pole loading calculations had been performed at the time of construction for the Topaz 1261 circuit.

[8] : Liberty Utilities 2019 General Rate Case (A.18-12-001), Chapter 2: Capital, November 30, 2018 at 6.

Liberty could not produce pole loading records dated to its purchase of the Topaz 1261 circuit and other distribution assets from NV Energy. Liberty was in fact cited by SED in 2012 for pole load calculations that "did not contain accurate information." This appears to have still been the case at the time of the Mountain View ignition, as Liberty could not produce any record of pole loading calculations for the ignition site East Pole prior to the ignition, and the pole loading calculations Liberty produced for the West Pole appear to be erroneous.

To determine whether these poor record keeping practices extended beyond the Topaz circuit, Cal Advocates requested pole loading calculations for 20 randomly selected poles and towers. Liberty was able to produce pole loading calculations for only two.

IX. EXHIBIT CA-09: VEGETATION MANAGEMENT

Cal Advocates reviewed Liberty's vegetation management practices at the time of the ignition and found them to be largely consistent with industry standards and Commission regulations. There is no evidence that Liberty's vegetation management practices contributed to the Mountain View ignition, and Liberty's records in the area were adequate to show that it was performing inspections and mitigation work consistent with regulatory requirements and with its commitments in the 2020 Wildfire Mitigation Plan.

Liberty conducted vegetation management inspections and mitigation work to address the vegetation clearances near the site of the Mountain View ignition in September and October of 2020, and was able to produce records substantiating that the work had been completed.

X. EXHIBIT CA-10: LITIGATION AND CLAIMS RESOLUTION

Cal Advocates attempted to review Liberty's claims resolution practices, however Liberty's overly broad privilege claims limited review. Liberty asserts that attorney-

client privilege covers most of the initial claims.[9] And, Liberty asserts that it entered into settlement agreements with terms that render the entire agreements confidential, including the settlement amount. The only data Liberty provided in response to Cal Advocates discovery was the total settlement value for each plaintiff type.

From this limited data, Cal Advocates was able to conclude that Liberty settled subrogation claims for a much higher percentage than other utilities have done with similar subrogation claims in recent wildfires.

XI. EXHIBIT CA-11: LIBERTY'S COST RECOVERY PROPOSAL

Liberty has proposed to recover costs related to the Mountain View Fire over a three year amortization period, using a separate line item on customer bills. Liberty proposes to recover the $78.2 million via a 4.451 cent per kW/h surcharge, collected equally from all customer classes.

Liberty's customers face a substantial cumulative bill impact from the WEMA balance and Liberty's pending 2025 General Rate Case proceeding. Liberty's non-CARE permanent Residential customers would pay 52.0% more per month on average, an increase of $103.54. Residential CARE customers would face an average monthly bill increase of 36.9%, or $54.41.

XII. CONCLUSION

Liberty's practices exacerbated the likelihood of an ignition. Liberty was aware at the time of the ignition that the Topaz 1261 circuit was one of its least reliable circuits. Liberty indicates that the Topaz circuit frequently experienced conductor breaks and that splices to repair these breaks were common. There is evidence of splices on the Topaz 1261 circuit and the subject span, consistent with prior wire slap and conductor breaks. In response to the circuit's low reliability, Liberty paradoxically set higher PSPS thresholds for the Topaz circuit than for the remainder of its system.

[9] Liberty's response to data request CalAdvocates-LIB-A2406017-009, question 12. This source is attached to Ex. CA-09.

Liberty had real time weather data available showing deteriorating weather conditions on the morning of the ignition but instead relied entirely on forecast data and did not consider initiating a PSPS event. SCE saw the same weather conditions and determined that there was sufficient wildfire risk to necessitate de-energizing two nearby circuits.

Liberty was not prepared on the day of the ignition, despite the nearby Slink fire having only been contained four days prior. The Topaz 1261 circuit had an extensive history of wire slap, broken conductor, and splicing. Despite two phase-to-phase faults earlier in the day consistent with wire slap and worsening weather conditions, Liberty employed its normal operational settings on its reclosers at the time of the ignition. As a result, when arcing from the third phase-to-phase fault caused the subject span conductor to break and fall into grassy fuel, the line remained energized long enough to spark and ignite the Mountain View Fire.

APPENDIX A
QUALIFICATIONS OF WITNESS

PREPARED TESTIMONY AND QUALIFICATIONS

OF

MATTHEW A. KARLE

My name is Matthew A. Karle. My business address is 505 Van Ness Avenue, San Francisco, California. I am employed by the Public Advocates Office (Cal Advocates) as a Program and Project Supervisor in the Safety Branch.

I hold a Master of Arts degree in Government from California State University, Sacramento, and a Bachelor of Arts degree in Political Science from San Francisco State University.

I have testified before the California Public Utilities Commission (Commission) as an expert witness in numerous Commission regulatory proceedings. I have been an expert witness in the following areas and proceedings: Depreciation: PG&E 2014 GRC, PG&E 2015 GT&S, SCE 2015 GRC, SDG&E/SoCalGas 2016 GRC; Pipeline Corrosion Control: PG&E 2015 GT&S. Revenue Cycle Services Marginal Costs: PG&E 2017 GRC Phase 2; Customer Marginal Costs: SCE 2018 GRC Phase 2. Infrastructure Programs, SouthWest Gas 2021 GRC.

I have also authored comments to the Office of Energy Infrastructure Safety on SDG&E's 2020 and 2021 WMPs, PacifiCorp's 2021 WMP, and SCE's 2022 WMP.

This completes my prepared testimony.