

HEARING EXHIBIT SBUA-05

A.25-06-017

**Liberty's Responses to
SBUA-Liberty-DR-In Lieu of Cross
Examination**



Liberty Utilities (CalPeco Electric) LLC
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February 25, 2026

Liberty Utilities (CalPeco Electric) LLC

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

Small Business Utility Advocates

Data Request No.: SBUA-Liberty-DR-In Lieu of Cross Examination
Requesting Party: Small Business Utility Advocates
Originator: Ariel Strauss, ariel@utilityadvocates.org
James Birkelund, james@utilityadvocates.org
Date Received: February 9, 2026
Due Date: February 25, 2026

REQUEST NO. 1:

Confirm whether Liberty's exhibits served in this proceeding or data request responses identify Liberty as having been required to perform (under its own policies or otherwise) or having performed any circuit-specific engineering analysis prior to November 17, 2020, evaluating the risk of conductor contact on the Topaz 1261 circuit under high wind conditions. Respond "Yes" or "No." If "Yes," identify the analysis by citation, title, author, and date.

RESPONSE:

No, Liberty is not aware of any Liberty exhibits or data request responses in this proceeding identifying Liberty as having been required to perform or having performed prior to November 17, 2020 a Topaz 1261 Circuit-specific engineering analysis evaluating the risk of conductor-to-conductor contact on the Circuit under high wind conditions. As described in Exhibits LIB-3E at page 14 and LIB-10 at page 6, Liberty's facilities are designed and maintained to conform to General Order ("GO") 95 Heavy Loading Criteria, which require conductor clearances to be maintained under a temperature of 0°F and loading of 6 pounds per square foot, which equates to a wind speed of roughly 48 mph. Please refer to attachment *CONFIDENTIAL-Topaz Line Rebuild - Phase Five - As built.pdf* for an example of engineering requirements for the Topaz Line Rebuild, provided in response to Question 4 of CalAdvocates-LIB-A2506017-018, which was provided to SBUA with Question 1 of SBUA-Liberty-DR-01 and is attached hereto. See

Liberty's response to Question 2 regarding analysis related to the setting of the wind gust thresholds for Liberty's PSPS protocol.

REQUEST NO. 2:

Confirm whether Liberty's exhibits served in this proceeding or data request responses identify Liberty as having been required to perform (under its own policies or otherwise) or having performed any analysis correlating (a) historical outages involving conductor contact or suspected wire slap on the Topaz 1261 circuit with (b) historical wind speeds, prior to calibrating and establishing PSPS initiation thresholds or operational circuit settings. Respond "Yes" or "No." If "Yes," identify the citations for this analysis.

RESPONSE:

No, Liberty is not aware of any Liberty exhibits or data request responses in this proceeding identifying Liberty as having been required to perform or having performed an analysis correlating (a) historical outages involving conductor contact of suspected wire slap on the Topaz 1261 Circuit with (b) historical wind speeds, prior to calibrating and establishing PSPS initiation thresholds or operational circuit settings. As described in Exhibits LIB-3E, at page 34 and CA-05-SA, Exhibit 12, at page CA-05-0496, Liberty engaged a fire science and risk modeling consultant to develop its PSPS de-energization thresholds as set forth in Liberty's 2020 Wildfire Mitigation Plan, Exhibit CA-04-SA, Attachment 11, at page CA-04-1185. As described in Exhibit CA-05-SA, Attachment 8, at page CA-05-0366, Liberty's fire science and risk modeling consultant analyzed the relationship between wind gust speeds and electrical outages generally in establishing the wind gust thresholds for PSPS de-energization.

REQUEST NO. 3:

Confirm whether Liberty's exhibits served in this proceeding or data request responses identify Liberty as having been required (under its own policies or otherwise) to conduct or having conducted any circuit-specific study, modeling, simulation, or engineering review evaluating how the Topaz 1261 conductors would behave under forecasted or historically observed high wind conditions. Respond "Yes" or "No." If "Yes," identify the applicable citations.

RESPONSE:

No, Liberty is not aware of any Liberty exhibits or data request responses in this proceeding identifying Liberty as having been required to conduct or having conducted a Topaz 1261-specific study, modeling, simulation, or engineering review evaluating conductor behavior under forecasted or historically observed high wind conditions. As described in Exhibits LIB-3E at page 14 and LIB-10 at page 6, Liberty's facilities are designed and maintained to conform to GO 95 Heavy Loading Criteria, which require conductor clearances to be maintained under a temperature of 0°F and loading of 6 pounds per square foot, which equates to a wind speed of roughly 48 mph. Please refer to attachment *CONFIDENTIAL-Topaz Line Rebuild - Phase Five - As built.pdf* for an example of engineering requirements for the Topaz Line Rebuild, provided in response to Question 4 of CalAdvocates-LIB-A2506017-018, which was provided to SBUA with Question 1 of SBUA-Liberty-DR-01 and is attached hereto. See Liberty's response to Question 2 regarding analysis related to the setting of the wind gust thresholds for Liberty's PSPS protocol.

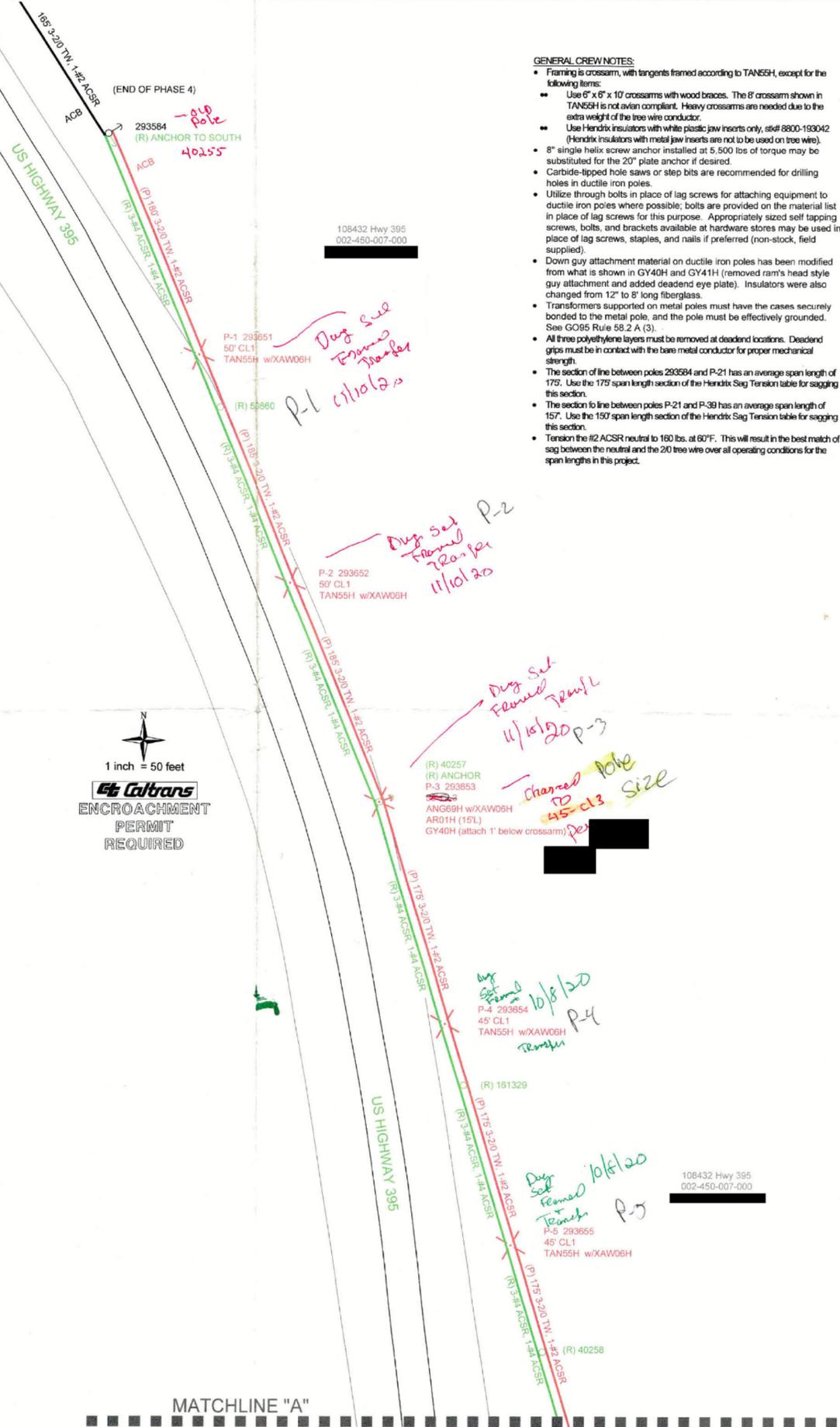
REQUEST NO. 4:

Confirm whether Liberty's exhibits served in this proceeding or data request responses identify Liberty having performed any engineering analysis, often referred to as "root cause", to determine the physical mechanism that caused the conductors to contact (including but not limited to, wind-driven blowout, galloping, tension conditions, hardware interaction, or other dynamic behavior) on November 17, 2020. If "Yes," identify the applicable citations.

RESPONSE:

No, Liberty is not aware of any Liberty exhibits or data request responses in this proceeding identifying Liberty as having been required to perform or having performed a "root cause" analysis to determine the physical mechanism that caused the conductors to contact. Please see Liberty's response to CalAdvocates-LIB-A2506017-026 Q1, which was provided to SBUA in response to Question 1 of SBUA-Liberty-DR-01. As described therein, Liberty is not aware of any formal root cause evaluation of the phase-to-phase contact on November 17, 2020. Liberty concluded that the phase-to-phase contact on November 17, 2020, was likely the result of chaotic movement of the conductors in very high winds. Liberty did not identify any failed equipment on the Subject Span that would explain the phase-to-phase contact. As described in Exhibit LIB-3E at page 15, the conductor clearances were consistent with Liberty's standards and exceeded GO 95 requirements. Post-fire field measurements recorded radial clearances of 54 inches between the center and field conductors and between the center and road conductors.

SOURCE:
TOPAZ 1261 CIRCUIT
7.2/12.5 KV NORM OUT OF TOPAZ SUB



- GENERAL CREW NOTES:**
- Framing is crossarm, with tangents framed according to TAN55H, except for the following items:
 - Use 8" x 6" x 10' crossarms with wood braces. The 8' crossarm shown in TAN55H is not avian compliant. Heavy crossarms are needed due to the extra weight of the tree wire conductor.
 - Use Hendrix insulators with white plastic jaw inserts only, sk# 8800-193042 (Hendrix insulators with metal jaw inserts are not to be used on tree wire).
 - 8" single helix screw anchor installed at 5,500 lbs of torque may be substituted for the 20" plate anchor if desired.
 - Carbide-tipped hole saws or step bits are recommended for drilling holes in ductile iron poles.
 - Utilize through bolts in place of lag screws for attaching equipment to ductile iron poles where possible; bolts are provided on the material list in place of lag screws for this purpose. Appropriately sized self tapping screws, bolts, and brackets available at hardware stores may be used in place of lag screws, staples, and nails if preferred (non-stock, field supplied).
 - Down guy attachment material on ductile iron poles has been modified from what is shown in GY40H and GY41H (removed ram's head style guy attachment and added deadend eye plate). Insulators were also changed from 12" to 8" long fiberglass.
 - Transformers supported on metal poles must have the cases securely bonded to the metal pole, and the pole must be effectively grounded. See GOR5 Rule 58.2 A (3).
 - All three polyethylene layers must be removed at deadend locations. Deadend grips must be in contact with the bare metal conductor for proper mechanical strength.
 - The section of line between poles 293564 and P-21 has an average span length of 175'. Use the 175' span length section of the Hendrix Sag Tension table for sagging this section.
 - The section of line between poles P-21 and P-39 has an average span length of 157'. Use the 150' span length section of the Hendrix Sag Tension table for sagging this section.
 - Tension the #2 ACSR neutral to 160 lbs. at 60°F. This will result in the best match of sag between the neutral and the 2/0 tree wire over all operating conditions for the span lengths in this project.

1 inch = 50 feet
ENCROACHMENT PERMIT REQUIRED

MATCHLINE "A"

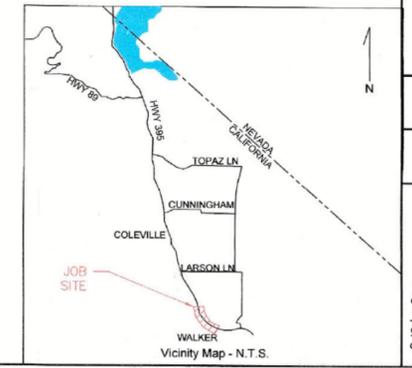
LIBERTY UTILITIES TO FURNISH AND INSTALL:

- Approx. 6,515 ckt. ft. of 3 phase o/h primary conductor c/o 3-2/0 ACSR tree wire (approx. 21,500 cbl. ft.) and 1-#2 ACSR neutral (approx. 7,167 cbl. ft.)
 - Approx. 430 ckt. ft. (473 cbl. ft.) of 2/0 TX o/h secondary
 - Three (3) 1 phase 15 kVA o/h transformers, 7.2/12.5kV, 120/240V, stk. # 80-7101-3 banked wye-delta for straight 240V service
 - Five (5) 1 phase 25 kVA o/h transformers, 7.2/12.5kV, 120/240V, stk. # 80-7151-3
 - Two (2) 1 phase o/h transformers (one 25kVA stk. # 80-7151-3 and one 50kVA stk. # 80-7251-3), 7.2/12.5kV, 120/240V, banked open wye-open delta for 120/240V single phase and 240V three phase service
 - One (1) 1 phase 50 kVA o/h transformer, 7.2/12.5kV, 120/240V, stk. # 80-7251-3
 - Two (2) 45 ft CL1 wood poles
 - One (1) 45 ft CLH1 wood pole
 - Two (2) 50 ft CL3 wood poles
 - Two (2) 50 ft CL2 wood poles
 - Eleven (11) 50 ft CL1 wood poles
 - Two (2) 50 ft CLH1 wood poles
 - One (1) 55 ft CL3 wood pole
 - One (1) 55 ft CL1 wood pole
 - Seventeen (17) 50 ft CLH1 ductile iron poles
 - One (1) primary anchor c/o 20" plate, 1" rod, 1/2" E.H.S. down guy, and lead length as shown on the drawing
 - Seven (7) primary anchors c/o 20" plate, 1" rod, 3/8" E.H.S. down guy, and lead lengths as shown on the drawing
 - One (1) 3/8" E.H.S. primary down guy to existing anchor (anchor may be reused if inspected and accepted by Liberty)
 - Seven (7) secondary anchors c/o 20" plate, 1" rod, 3/8" E.H.S. down guy, and lead lengths as shown on the drawing
 - Two (2) 3/8" E.H.S. secondary down guys to existing anchors (anchors may be reused if inspected and accepted by Liberty)
 - Three (3) street lights relocated from existing poles to new poles as shown on the drawing
 - Approx. 380 ft of 3/8" span guy
 - Stand-off brackets and lag screws for risers
 - Twenty-one (21) Fused cutouts (fuse size and type at each location is shown on drawing)
 - One (1) fixed capacitor bank relocated from existing pole and mounted to a new pole at the alternate location shown on the drawing
 - Twelve (12) 8" x 5/8" ground rods, one each at transformer and riser pole location, and as shown to meet the 4 grounds per mile requirement for a grounded wye system
- Follow all applicable Liberty Utilities standards and California GO 95 requirements

LIBERTY UTILITIES TO REMOVE:

- Approx. 6,515 ckt. ft. of 3 phase o/h primary conductor c/o 3-#4 ACSR and 1-#4 ACSR
- Approx. 690 ckt. ft. of 3-#2 ACSR open wire secondary
- Approx. 120 ckt. ft. of #2 TX o/h secondary
- One (1) 1 phase 15 kVA o/h transformer, 7.2/12.5kV, 120/240V
- Three (3) 1 phase 15 kVA o/h transformers, 7.2/12.5kV, 120/240V, banked wye-delta for straight 240V service
- Five (5) 1 phase 25 kVA o/h transformers, 7.2/12.5kV, 120/240V
- Two (2) 1 phase 25 kVA o/h transformers, 7.2/12.5kV, 120/240V, banked open wye-open delta for 120/240V single phase and 240V three phase service
- Nine (9) 35 ft wood poles
- Seventeen (17) 40 ft wood poles
- Six (6) 45 ft wood poles
- Twelve (12) single anchors, rods, and down guys

LIBERTY	11'	13'	15'
NEUTRAL	6'	6'	6'
PHONE/CABLE	22'	24'	26'
POLE TREE	45'	50'	55'



2 working days
Call before you Dig.
 Dial 811

SYMBOLS NOT TO SCALE AND DO NOT NECESSARILY REPRESENT ACTUAL LOCATION OF FACILITIES.

Liberty Utilities
 833 Howe Ave
 South Lake Tahoe
 California 96150
 Phone: (530) 954-3281
 Fax: (530) 544-4811

MWP - Topaz 1261 Reconductor - Phase 5
Liberty Utilities
 Job Number: 8800-0120-0348
 Service Number: 8800-0120-0063, 8800-0120-0073

Planner:	
Customer:	
Liberty Utilities	

No.	Revision	Date	Drawn	Checked	Reviewed	Engineer
1	BASE	6/22/20				
2	ELECTRIC	6/28/20				
3	40% Design for permitting & right-of-way	7/10/20				
4	100% Design	7/29/20				
5						
6						

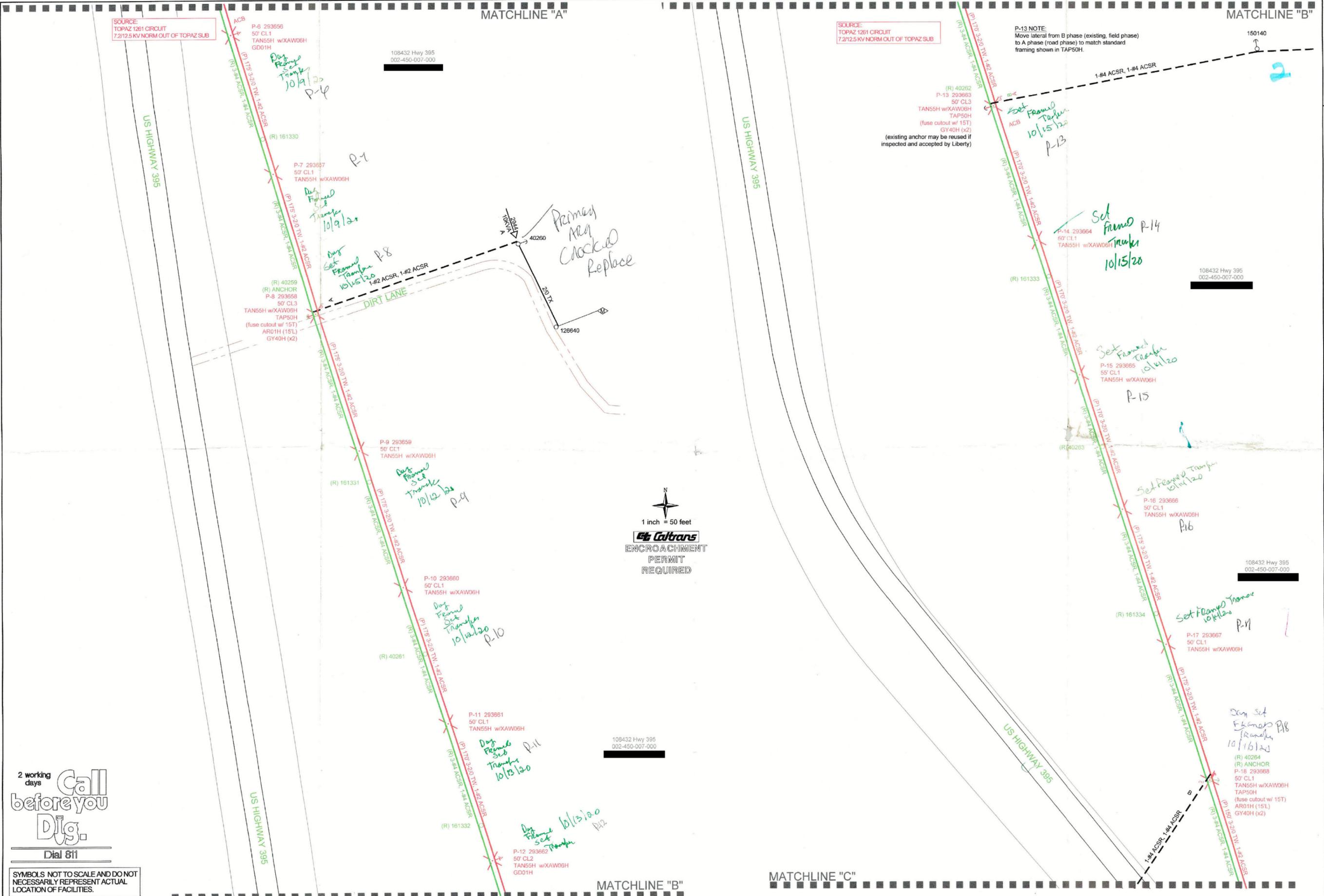
7/30/20
 Page 1 of 6

1
 1090
 3th
 sk.

bsb21

No.	Revision	Date	Drawn	Checked	Engineer
1	BASE	6/22/20			
2	ELECTRIC	6/29/20			
3	40% Design for permitting & right-of-way	7/10/20			
4	100% Design	7/30/20			
5					
6					

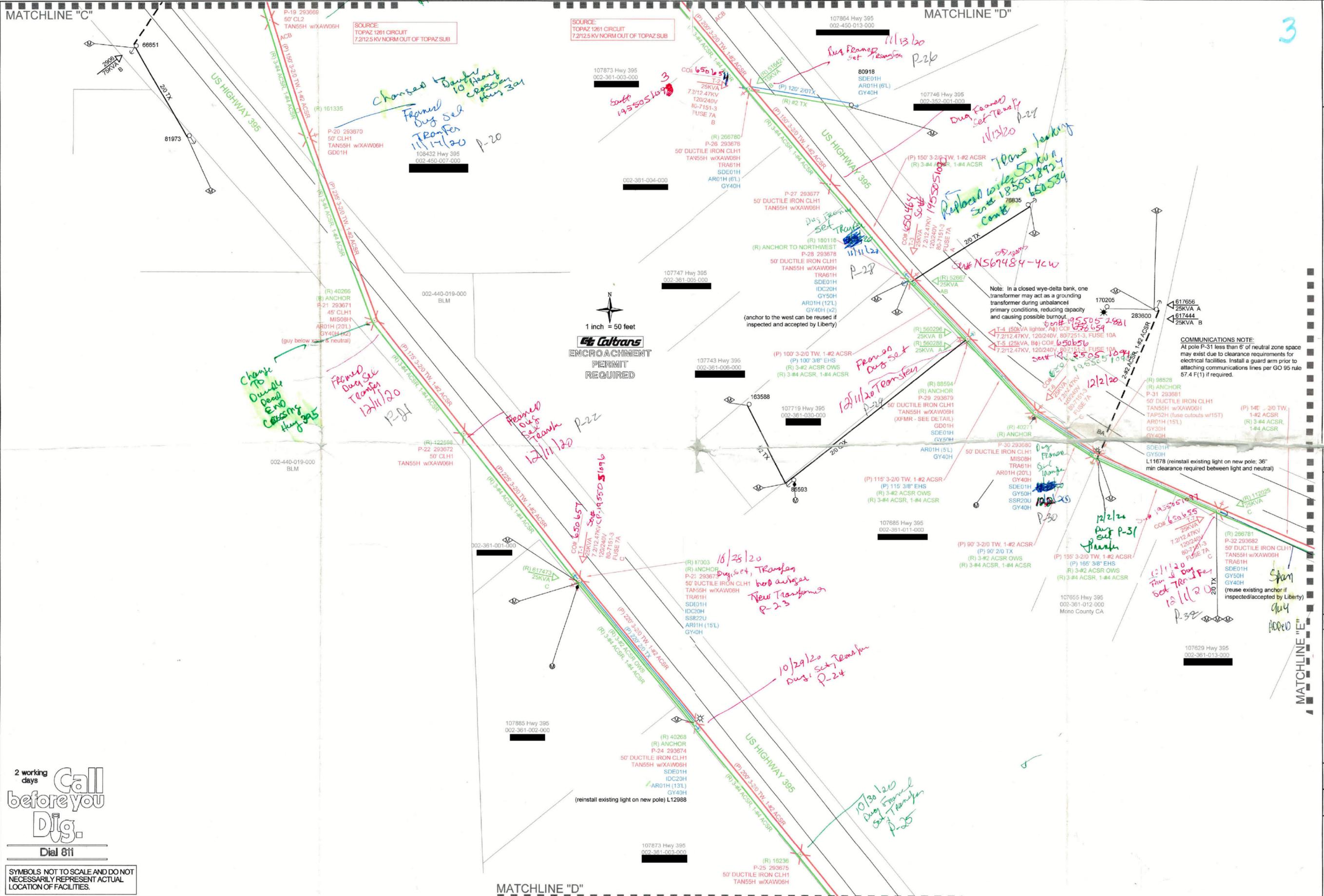
Customer: Liberty Utilities



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Planner:	
Customer:	Liberty Utilities
No.	Revision
1	BASE
2	ELECTRIC
3	40% Design for permitting & right-of-way
4	100% Design
Date	6/22/20
Drawn	
Designer	
Review	
Engineer	
7/30/20	
Page 3 of 6	



2 working days
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