

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**

Order Instituting Rulemaking to Implement
Electric Utility Wildfire Mitigation Plans
Pursuant to Senate Bill 901 (2018).

Rulemaking 18-10-007
(Filed October 25, 2018)

**RESPONSE OF LIBERTY UTILITIES (CALPECO ELECTRIC) LLC (U 933 E) TO
ADMINISTRATIVE LAW JUDGE'S RULING SEEKING ADDITIONAL INFORMATION ON
WILDFIRE MITIGATION PLANS AND NOTICE REGARDING THE LOCATION OF
DOCUMENTS REFERENCED IN ITS WILDFIRE MITIGATION PLAN**

Sharon Yang
Director of Legal Services
Liberty Utilities (CalPeco Electric) LLC
9750 Washburn Road
Downey, CA 90241
Telephone: (562) 299-5120
Email: sharon.yang@libertyutilities.com

February 26, 2019

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Pursuant to the February 21, 2019 Administrative Law Judge’s Ruling Seeking Additional Information on Wildfire Mitigation Plans (Ruling), Liberty Utilities (CalPeco Electric) LLC (“Liberty CalPeco”) hereby submits this response, providing a word-searchable and modifiable version of Appendix A in its Wildfire Mitigation Plan attached hereto.

In addition, pursuant to the February 19, 2019 E-Mail Ruling Regarding Discovery/Data Requests and Other Supporting Information, Liberty CalPeco hereby provides notice that the documents referenced in Liberty CalPeco’s Wildfire Mitigation Plan filed February 6, 2019, will be located and available for review at the following website:

<https://california.libertyutilities.com/north-lake-tahoe/residential/safety/wildfire-mitigation-plan.html>

Respectfully submitted,

/s/ Sharon Yang

Sharon Yang
Director of Legal Services
Liberty Utilities (CalPeco Electric) LLC
9750 Washburn Road
Downey, CA 90241
Telephone: (562) 299-5120
Email: sharon.yang@libertyutilities.com

February 26, 2019

Appendix A
Wildfire Mitigation Plan



Liberty Utilities (CalPeco Electric), LLC

Wildfire Mitigation Plan



Liberty UtilitiesSM

Assisted by:

Navigant Consulting, Inc.
35 Iron Point Circle
Suite 225
Folsom, CA 95630

858.354.8333
navigant.com

Reference No.: 207670
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DISCLAIMER

The State of California and the California Public Utilities Commission (Commission or CPUC) mandated through Order Instituting Rulemaking (OIR) that the electric utilities develop a “Wildfire Mitigation Plan” pursuant to Senate Bill (SB) 901. In Rulemaking (R.) 18-10-007, The Commission provided a specific outline that the electric utilities were to follow in the development of their Wildfire Mitigation Plans. Electric utilities’ Wildfire Mitigation Plans (WMP or Plan) aim to reduce utility-posed wildfire risks while creating a process for review and implementation throughout the iteration filings of the Plan.

Liberty Utilities (CalPeco Electric), LLC (Liberty CalPeco) retained Navigant Consulting, Inc. (Navigant) as support in the development of their Wildfire Mitigation Plan. Navigant’s approach in supporting the development of Liberty CalPeco’s Wildfire Mitigation Plan included:

- **Data Requests:** Navigant requested data, reports, and prior plans to be incorporated into their proposed Plan.
- **Interviewed Liberty Personnel:** A series of interviews were held with Liberty CalPeco personnel to determine specific actions and strategies to be included along with site inspection of select equipment and infrastructure.
- **Plan Development:** Navigant developed a Wildfire Mitigation Plan based on the direction and information provided to Navigant by Liberty CalPeco.
- **Review of the Plan:** Liberty CalPeco reviewed and approved their Wildfire Mitigation Plan outlined in this report.

Navigant assisted Liberty CalPeco in preparing this report for filing, based on the information and plans the utility provided. The information presented in this report represents Navigant’s professional judgment based on the information available at the time this report was prepared with Liberty CalPeco’s overall decision-making. Navigant is not responsible for the reader’s use of, or reliance upon, the report, nor any decisions based on the report. NAVIGANT MAKES NO REPRESENTATIONS OR WARRANTIES, EXPRESSED OR IMPLIED. Readers of the report are advised that they assume all liabilities incurred by them, or third parties, as a result of their reliance on the report, or the data, information, findings and opinions contained in the report.

APPENDIX A. WILDFIRE MITIGATION STRATEGIES & PROGRAMS

§8386 (c) (3)(4)(8)(9): Wildfire Mitigation Strategies and Programs

Program/Strategy (§ 8386(c)(3))	Asset Addressed (Ex: line, poles, etc. (§ 8386(c)(3))	Annual Cost (Capital v. Expense) (Scoping Memo at 4: "In evaluating the proposed plans the Commission may weigh the potential cost implications of measures proposed in the plans")	Costs Currently Reflected in Revenue Requirement? (Provide Decision Reference) If for Only Part of Budget, Identify the \$ for that Part and Explain Part Not Previously Authorized (§ 8386(j))	Compliance Requirement? (Provide Code/GO Reference) If for Only Part of Budget, Identify the \$ for that Part and Explain Part that is Not Compliance	Identify any Aspects of Plan/Strategy and Associated Funding That is or Will Be Addressed in Another Case (Identify the Case (§ 8386(j))	Identify Memorandum Accounts Where Costs of Program/Strategy Are Being Tracked and Explain How Double Tracking is Prevented (§ 8386(j))	Previously Included in RAMP? (Provide Reference) (§ 8386 (c)(11))	Evaluation Metric(s) (§ 8386 (c)(4))	Assumptions Underlying Metric (§ 8386 (c)(4))	Categories: (1) Design and Construction, (2) Inspection and Maintenance, (3) Operational Practices, (4) Situational/C onditional Awareness, and/or (5) Response and Recovery
OPERATIONAL PRACTICES										
Automatic Reclosers & Fast-Curve Settings	Automatic Circuit Reclosers and Controls including SCADA	\$735,000 (total project) // Capital	Yes	NA	2019 GRC application pending approval	NA	NA	deployment schedule is on track for completion	<ul style="list-style-type: none"> • Remote monitoring of system assets promotes faster outage response • Supervisory controls will provide the settings necessary to reduce electrical ignition, while also helping to mitigate power outages 	(3) Operational Practice

Liberty Utilities (CalPeco Electric), LLC Wildfire Mitigation Plan

Elevated Weather Events Operations (e.g. during Red Flag Warnings)	All Circuit Recloser Settings; Trip Savers; At-Risk Circuits	Standard Business Operations // Expense	Yes	D.12-01-032 pursuant to R. 08-11-005; PU Code Sections 451 and 399.2(a)	NA	NA	NA	Number of Red Flag Warnings during fire season	Fire frequency will reduce by maintaining a hardened system and commitment to these operational practices	(3) Operational Practice
Wildfire Infrastructure Protection Teams	All System Assets	Standard Business Operations // Expense	Yes	PU Code Sections 451 and 399.2(a); GO 166	Pending 2019 GRC application	NA	NA	Coordination during risk events captured and tracked	Rationale: Ensure staff is prepared to mobilize in high-risk and emergency situations	(3) Operational Practice
PLANS FOR INSPECTION										
On-Ground Routine Inspections	All Equipment and Infrastructure Assets	Standard Business Operations // Expense	Yes	GO 165	Pending 2019 GRC application	NA	NA	NA	NA	(2) Inspection and Maintenance
Equipment Asset Inspections	Equipment Assets	Standard Business Operations // Expense	Yes	GO 165	Pending 2019 GRC application	NA	NA	Planned inspections are carried out	Rationale: Regular patrols that identify aging infrastructure or equipment that pose a fire risk	(2) Inspection and Maintenance
Vegetation Risk Inspections	All Assets near Vegetation	Approx. \$4 million annually (as part of the Vegetation Maintenance Expense)	Yes	GO 95, Rule 35 and Public Resources Code (PRC) 4293; D.17-12-024	Pending 2019 GRC application	Vegetation Management Balancing Account	NA	NA	NA	(2) Inspection and Maintenance

Liberty Utilities (CalPeco Electric), LLC Wildfire Mitigation Plan

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SYSTEM HARDENING										
Pole Loading & Replacement	All Distribution Poles	\$16,765 is spent on software license costs; 2 hours per pole evaluation at \$50 per hour; \$12,000 - \$15,000 per pole // Capital	Yes	GO 95 Rule 44	NA	Proposed Wildfire Mitigation Memorandum Account	NA	Number of pole replacements	Rationale: Determine if structural integrity of the pole is within calculated threshold	(1) Design and Construction
Covered Conductors	Prioritized Lines; Tahoe City Line 7300; Topaz Line 1261	Between \$614,000 and \$1,228,000 per year: -Overhead construction costs + additional costs via (1-2 miles) covered wire are \$614,000 per mile // Capital	Yes	NA	NA	Proposed Wildfire Mitigation Memorandum Account	NA	Determine if plan is on schedule	Rationale: Mitigate contact of ignition source (heat) by covering the wire.	(1) Design and Construction

Liberty Utilities (CalPeco Electric), LLC Wildfire Mitigation Plan

Fusing	Replace Conventional Fuses	\$721, 550 // Capital	No	NA	NA	Proposed Wildfire Mitigation Memorandum Account	NA	Determine if plan is on schedule	Rationale: Mitigate downed wires and reduce energy at potential fault locations	(1) Design and Construction
Substation Design Hardening	Brockway Substation; Stateline Substation	\$16,500,000 for total proposed costs // Capital	No	GO 174	Brockway presented in 2019 GRC application	Proposed Wildfire Mitigation Memorandum Account	NA	Assess reliability and safety improvements	Rationale: Modernize aging capital infrastructure to mitigate fire risk	(1) Design and Construction
Tree Attachment Removal	All Tree Attachments	\$7,000 per pole/tree for attachment removal; yielding \$420,000 annually // Expense	No	NA	NA	Proposed Wildfire Mitigation Memorandum Account	NA	Number of service tree attachments removed per year	• Pole attachment risks exist throughout the utility's distribution system	(1) Design and Construction

Liberty Utilities (CalPeco Electric), LLC Wildfire Mitigation Plan

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VEGETATION MANAGEMENT										
Routine Vegetation Maintenance	All Assets near Vegetation	Approx. \$4 million annually // Expense	Yes	GO 95 Rule 35; Public Resources Code Sections 4292 & 4293	Pending 2019 GRC application	Vegetation Management Balancing Account	NA	Assess value after increasing budget in inspection procedures; clearances	Determine if an increase or decrease in vegetation follow-up results from increase budget.	(2) Inspection and Maintenance
Tree Mortality Removal Project	All Assets near Affected Vegetation	>\$1 million annually // Expense	No	GO 95 Rule 35; Public Resources Code Section 4293	E-3238	Proposed Tree Mortality CEMA	NA	NA	NA	(2) Inspection and Maintenance

Liberty Utilities (CalPeco Electric), LLC Wildfire Mitigation Plan

Forest Resiliency Corridor Development	All Assets within the ROW Corridor	Proposed Liberty CalPeco required contribution for grant: \$661,030 // Expense	No	GO 95 Rule 35; Public Resources Code Sections 4292 & 4293; Executive Order N-05-19	Pending 2019 GRC application	Proposed Wildfire Mitigation Memorandum Account	NA	NA	NA	(2) Inspection and Maintenance
SITUATIONAL AWARENESS										
Weather Stations	13 Weather Station being installed	\$75,000 averaged annually; total approx. cost for all 13 stations: \$148,720 // Capital	No	NA	NA	Proposed Wildfire Mitigation Memorandum Account	NA	Number of weather stations installed	Rationale: Improves forecasting and de-energization and restoration plans	(4) Situational / Conditional Awareness
Weather Monitoring	All Assets	Standard Business Operations // Expense	Yes	D.12-01-032 pursuant to R. 08-11-005; ESRB-8	NA	Proposed Wildfire Mitigation Memorandum Account	NA	NA	NA	(4) Situational / Conditional Awareness
RESPONSE & RECOVERY										
PSPS Events	All Assets	Standard Business Operations // Expense	Yes	NA	R. 18-12-005	NA	NA	Monitor the number of PSPS events over time as an indicator of changing climatic and weather patterns	Determine the effective of procedures for PSPS events.	(5) Response and Recovery
Post Incident Recovery, Restoration & Remediation	All Assets	Standard Business Operations // Expense	Yes	Resolutions M-4833 & M-4835	R. 18-03-011 & R. 18-12-005	NA	NA	NA	NA	(5) Response and Recovery