



June 15, 2022

Jordan Parrillo
Regulatory Affairs Manager
Liberty Utilities
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Subject: Office of Energy Infrastructure Safety Issuance of Rejection for Incompleteness and Order to Resubmit for Liberty Utilities' 2022 Wildfire Mitigation Plan Update

Dear Mr. Parrillo,

The Office of Energy Infrastructure Safety (Energy Safety) rejects Liberty Utilities' (Liberty) submission of its 2022 Wildfire Mitigation Plan Update (2022 Update). Pursuant to the 2022 Wildfire Mitigation Plan Update Guidelines, Energy Safety may immediately reject any WMP that does not satisfy initial completeness checks. In addition, Public Utilities Code (Pub. Util. Code) Section 8386.3(a), allows Energy Safety to require modification of a WMP before approval. Energy Safety effectuates this by issuing a Rejection for Incompleteness and Order to Resubmit.

Liberty's 2022 Update does not satisfy the completeness requirements delineated in the 2022 Wildfire Mitigation Plan Update Guidelines. Consequently, Energy Safety rejects Liberty's 2022 Update without any review of the substance of the 2022 Update submitted material.

Liberty shall revise and resubmit its 2022 Update by July 15, 2022, to include the missing elements and in accordance with the parameters noted in Energy Safety's Rejection for Incompleteness and Order to Resubmit.

Liberty may not amend or revise any other existing elements in its revised 2022 Update.

Stakeholders may submit comments on Liberty's revised 2022 Update within 30 calendar days of the resubmittal of Liberty's revised 2022 Update. Comments are due August 15, 2022. Reply comments are due 7 calendar days later on August 22, 2022, and shall be limited to issues raised and representations made in opening comments of other stakeholders. Opening

and reply comments must be submitted to the 2022 Wildfire Mitigation Plan Updates docket (#2022-WMPs).¹

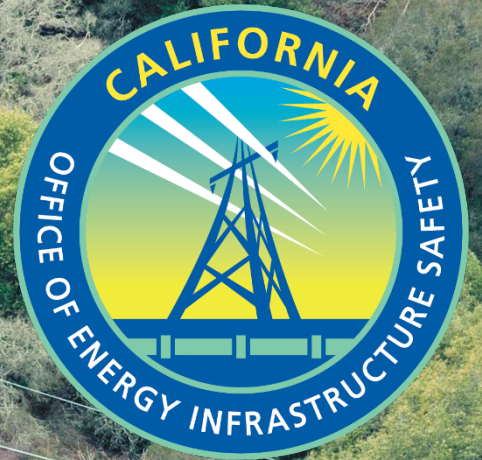
Sincerely,

A handwritten signature in black ink, appearing to read "Melissa Semcer". The signature is written in a cursive style with a large initial "M".

Melissa Semcer
Deputy Director | Electrical Infrastructure Directorate
Office of Energy Infrastructure Safety

Encl: Office of Energy Infrastructure Safety's Rejection for Incompleteness and Order to Resubmit for Liberty Utilities 2022 Wildfire Mitigation Plan Update

¹ Submit comments to the 2022-WMPs docket via the Energy Safety e-filing system here: <https://efiling.energysafety.ca.gov/EFiling/DocketInformation.aspx?docketnumber=2022-WMPs> (accessed June 10, 2022).



OFFICE OF ENERGY INFRASTRUCTURE SAFETY
**REJECTION FOR INCOMPLETENESS
AND ORDER TO RESUBMIT**
**LIBERTY UTILITIES 2022 WILDFIRE
MITIGATION PLAN UPDATE**

June 15, 2022

1. Introduction

Pursuant to Public Utilities Code (Pub. Util. Code) Section 8386.3(a), before approval of an electrical corporation's (hereafter "utility") Wildfire Mitigation Plan (WMP), the Office of Energy Infrastructure Safety (Energy Safety) may require modification of the WMP. Energy Safety effectuates this by issuing a Rejection for Incompleteness and Order to Resubmit.

Pursuant to the 2022 Wildfire Mitigation Plan Update Guidelines, "Energy Safety will first evaluate each electrical corporation's 2022 WMP Update as submitted for completeness based on the statutory requirements and adherence to the 2022 Guidelines," and "Energy Safety will reject without further review any WMP that does not satisfy initial completeness checks (i.e., incomplete, not fully referenced, or unsubstantiated statutory compliance check list)."²

Liberty Utilities' (Liberty's) 2022 WMP Update (2022 Update) submitted to Energy Safety's 2022 WMP docket (#2022-WMPs) on May 6, 2022, does not satisfy the completeness requirements. Consequently, Energy Safety rejects Liberty's 2022 Update without any review of the substance of the 2022 Update information submitted.

This Rejection for Incompleteness and Order to Resubmit documents the statutorily and/or guidelines-required elements missing from Liberty's 2022 Update. Liberty must revise its 2022 Update to include the missing elements according to the parameters set forth herein. Section 3 provides submission instructions and deadlines.

2. Missing Required Elements

Liberty is missing the following elements in its 2022 Update:

- **9.3 (appendix) Covered Conductor Installation Reporting**
- **9.4 (appendix) Undergrounding Implementation Reporting**

Additionally, in the following mitigation initiative sections,³ Liberty has failed to provide all the information required by the 2022 Guidelines.⁴ In many of the sections, Liberty exclusively refers to other portions of its WMP; however, the referenced text does not contain all the required information. In other sections, Liberty provides a short narrative that does not speak to all the required information. Incomplete sections include:

² Final 2022 Wildfire Mitigation Plan Update Guidelines, Attachment 5, p. 4 (accessed June 10, 2022): <https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=51912&shareable=true>.

³ Sections numbering is taken from Liberty's 2022 Update.

⁴ 2022 Update Guidelines, Attachment 2, p. 74.

- **7.3.6 Grid Operations and Protocols**

- *Section 7.3.6.3 (Crew-accompanying ignition prevention and suppression resources and services)* refers only to Section 7.3.6.4 which does not provide all the required information for this mitigation initiative.
- *Section 7.3.6.7 (Stationed and on-call ignition prevention and suppression resources and services)* refers only to Section 7.3.6.4 which does not provide all the required information for this mitigation initiative.

- **7.3.7 Data Governance**

- *Section 7.3.7.3 (Documentation and disclosure of wildfire-related data and algorithms)* refers only to Section 7.3.7.1 which does not provide all the required information for this mitigation initiative.
- *Section 7.4.7.4 (Tracking and analysis of risk event data)* refers only to Section 7.3.7.1 which does not provide all the required information for this mitigation initiative.

- **7.3.8 Resource Allocation Methodology**

- *Section 7.3.8.1 (Allocation methodology development and application)* refers only to Section 7.3.7.1 which does not provide all the required information for this mitigation initiative.
- *Section 7.3.8.2 (Risk reduction scenario development and analysis)* refers only to Section 7.3.7.1 which does not provide all the required information for this mitigation initiative.
- *Section 7.3.8.3 (Risk-spend efficiency analysis – not to include PSPS)* refers only to Sections 4.3 and 7.1 which do not provide all the required information for this mitigation initiative.

- **7.3.9 Emergency Planning and Preparedness**

- *Section 7.3.9.4 (Disaster and emergency preparedness plan)* includes only a short narrative that does not provide all the required information for this mitigation initiative.
- *Section 7.3.9.5 (Preparedness and planning for service restoration)* includes only a short narrative that does not provide all the required information for this mitigation initiative.
- *Section 7.3.9.6 (Protocols in place to learn from wildfire events)* includes only a short narrative that does not provide all the required information for this mitigation initiative.

- **7.3.10 Stakeholder Cooperation and Community Engagement**

- *Section 7.3.10.2 (Cooperation and best practice sharing with agencies outside California)* includes only a short narrative that does not provide all the required information for this mitigation initiative.
- *Section 7.3.10.3 (Cooperation with suppression agencies)* refers only to Sections 7.3.9.2 and 7.3.10.1 which do not provide all the required information for this mitigation initiative.

Liberty shall revise and resubmit its 2022 Update to include the missing elements noted above. **The revisions shall only include the missing elements.** Liberty may not amend or change any other elements in the 2022 Update. Any changes to the 2022 Update other than those requested will be disregarded in the substantive evaluation.

3. Conclusion and Next Steps

Liberty shall revise and resubmit its 2022 Update to Energy Safety by July 15, 2022.

Liberty must submit its revised 2022 Update to:

- 1) the Energy Safety Deputy Director at melissa.semcer@energysafety.ca.gov,
- 2) the 2022 Wildfire Mitigation Plan Updates docket (#2022-WMPs), and
- 3) the California Department of Forestry and Fire Protection at CALFIREUtilityFireMitigationUnit@fire.ca.gov (CAL FIRE).

Liberty must submit a redline and a clean version of its revised 2022 Update. For all updated auxiliary Excel files, Liberty must provide a clean version of the file and a change log that documents all adjustments to the file.

Submission files must use the naming conventions provided in the 2022 Guidelines.⁵ For example, “2022-07-15_LU_2022_WMP-Update_R1,” refers to Liberty’s 2022 Update, revision 1, submitted on July 15, 2022. The redlined version must be named “2022-07-15_LU_2022_WMP-Update_R1_redlined” and the auxiliary excel file “2022-07-15_LU_2022_WMP-Update_R1_Tables 1-12.”

Stakeholders may submit comments on Liberty’s revised 2022 Update within 30 calendar days of July 15, 2022. Reply comments are due 7 calendar days thereafter and shall be limited to issues raised and representations made in opening comments of other stakeholders. Opening and reply comments must be submitted to the 2022 Wildfire Mitigation Plan Updates docket (#2022-WMPs).

⁵Guidelines for Submission and Review of 2022 Wildfire Mitigation Plan Updates, Office of Energy Infrastructure Safety, Attachment 5, Electronic File Naming Convention with Examples, p.8.

The dates for this Rejection for Incompleteness and Order to Resubmit are:

Rejection for Incompleteness and Order to Resubmit:	June 15, 2022
Liberty's Revised 2022 Update Due:	July 15, 2022
Public and Stakeholder Comments Due:	August 15, 2022
Reply Comments Due:	August 22, 2022
Draft Decision Issued by Energy Safety:	September 12, 2022

Energy Safety has not conducted a substantive evaluation of Liberty's 2022 Update. The submission of a revised 2022 Update with the noted required elements does not guarantee the approval of Liberty's 2022 Update. Energy Safety will consider Liberty's revised 2022 Update, stakeholder comments, responses to data requests and the totality of the information before it to date before issuing a determination on Liberty's 2022 Update pursuant to Pub. Util. Code Sections 8386(b) and 8386.3(a).

If Liberty fails to submit a revised 2022 Update that includes all missing elements set forth in Section 2 by July 15, 2022, Energy Safety may deny Liberty's 2022 Update without further notice.

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