

**BEFORE THE OFFICE OF ENERGY INFRASTRUCTURE SAFETY  
DOCKET 2022 WMP**

**REPLY COMMENTS OF LIBERTY UTILITIES (CALPECO ELECTRIC) LLC (U 933-E)**

Jordan Parrillo  
Manager of Regulatory Affairs  
Liberty Utilities (CalPeco Electric) LLC  
701 National Ave,  
Tahoe Vista, CA 96148  
Telephone: 530-721-7818  
[Jordan.Parrillo@libertyutilities.com](mailto:Jordan.Parrillo@libertyutilities.com)

August 22, 2022

**BEFORE THE OFFICE OF ENERGY INFRASTRUCTURE SAFETY**  
**DOCKET 2022 WMP**

**REPLY COMMENTS OF LIBERTY UTILITIES (CALPECO ELECTRIC) LLC (U 933-E)**

Pursuant to the Office of Energy Infrastructure Safety (“OEIS”) 2022 Wildfire Mitigation Plan (“WMP”) Guidelines and OEIS Issuance of Rejection for Incompleteness and Order to Resubmit for Liberty Utilities’ 2022 WMP, Liberty Utilities (CalPeco Electric) LLC (“Liberty”) respectfully submits this reply to party comments on Liberty’s 2022 WMP Update. These comments respond to the recommendations to OEIS made by the Public Advocates Office (“Cal Advocates”) and the Green Power Institute (“GPI”).

**I. REPLY TO CAL ADVOCATES’ COMMENTS**

In Opening Comments, Cal Advocates makes several recommendations specific to Liberty’s 2022 WMP Update and future WMP submissions for the OEIS to consider. Liberty addresses these recommendations below.

**A. Cal Advocates’ recommended additional workplans and quarterly reports are duplicative of ongoing WMP reporting.**

Cal Advocates recommends Liberty produce a workplan to address incomplete 2021 goals under Grid Design and System Hardening, Vegetation Management, and Asset Inspection initiative categories. Cal Advocates also recommends subsequent quarterly updates to this workplan. Liberty already reports on targets and initiative progress in its WMP Updates each year in Section 7.3.3 and shows prior years’ targets as priority work in the following year, when applicable. Cal Advocates also recommends another workplan to address prioritization of covered conductor projects, with additional quarterly reporting. Liberty already submits initiative updates in its annual WMP submissions, including for the covered

conductor initiative, and quarterly updates on all WMP initiative progress in its Quarterly Initiative Updates (“QIU”). Cal Advocates’ recommended additional reporting is duplicative of Liberty’s existing reporting obligations.

**B. Liberty does not oppose increasing its planned Asset Inspection QA/QC Program target.**

Liberty’s Asset Inspection QA/QC Program target of 0.5% of all detailed inspections was chosen as an initial target for the program. Liberty does not oppose increasing its Asset Inspection QA/QC Program target as the program develops and progresses. Liberty includes initiative progress for its Asset Inspection QA/QC initiative in its QIU submissions to OEIS and thus does not oppose Cal Advocates recommendation to include this progress in its WMP quarterly reporting.

**C. Liberty does not oppose providing a breakdown of contract and in-house labor for vegetation management work in future WMP updates.**

Liberty does not oppose Cal Advocates’ recommendation to provide a breakdown in future WMP submissions of whether in-house or contract labor was utilized to perform vegetation management work and vegetation management QC inspections.

**D. Liberty does not oppose Cal Advocates’ recommendation to Energy Safety to hold discussions this year in its risk modeling group on appropriate fire simulation durations in risk models.**

Cal Advocates recommends the utilities collaborate to discuss an optimal fire spread simulation duration and provide analysis to support their chosen duration. Liberty does not oppose continued discussion of an optimal fire simulation duration in Energy Safety’s risk modeling group.

## **II. REPLY TO GPI’S COMMENTS**

In its opening comments, GPI makes several general recommendations for all small multi-jurisdictional utilities (“SMJU”) and several recommendations specific to Liberty’s 2022 WMP Update. Liberty addresses these recommendations below.

**A. Liberty supports collaborative efforts with other utilities to leverage existing data and ongoing studies relevant to WMP research efforts.**

GPI recommends collaborative efforts between utilities to utilize existing data and ongoing studies from one another. Liberty supports these efforts.

**B. Liberty does not oppose including tree species data in its risk modeling or vegetation management considerations.**

Liberty does not oppose including tree species data in risk modeling and vegetation management planning. However, a high- risk tree species does not directly indicate high risk trees, as the condition of the particular tree and other factors also inform how risky a tree is. Liberty has only a few variations in tree species in its service territory, but that does not mean that most trees are high risk.

**C. Additional risk modeling reporting prior to the next WMP update is unnecessary.**

GPI's recommendation of an additional plan and timeline for Liberty's Ignition Rate Model is unnecessary. Liberty is actively pursuing improvements to its Ignition Rate Model and consequence modeling and is assessing software solutions from vendors to assist in this effort. Liberty will provide updates on increased model sophistication, such as quantified wildfire consequence, in its next WMP update. GPI's recommendation to create additional risk modeling reports at this time would create unnecessary interim reporting.

**D. Liberty does not oppose GPI's recommendation to hold discussions regarding a standard fire spread model duration across utilities.**

As stated in Section I.D above, Liberty does not oppose discussion in Energy Safety's risk modeling group regarding a standard fire spread model duration across utilities.

**E. Liberty does not oppose GPI's recommendation to increase its Asset Inspection QA/QC rate.**

As stated in Section I.B above, Liberty does not oppose increasing its planned Asset Inspection QA/QC Program target as the program develops.

### III. CONCLUSION

Liberty appreciates this opportunity to respond to party Comments and looks forward to working with OEIS and other stakeholders to mitigate the risk of wildfires in California.

Respectfully submitted,

*/s/ Jordan Parrillo*

---

Jordan Parrillo  
Manager of Regulatory Affairs  
Liberty Utilities (CalPeco Electric) LLC  
701 National Ave,  
Tahoe Vista, CA 96148  
Telephone: 530-721-7818  
[Jordan.Parrillo@libertyutilities.com](mailto:Jordan.Parrillo@libertyutilities.com)

August 22, 2022