



To: Wildfire Mitigation Plans Service List

Date: January 29, 2026

Re: TAHOE SPARK Comments on Liberty's 2026-2028 Base Wildfire Mitigation Plan

The Office of Energy Infrastructure Safety (Energy Safety) accepted stakeholder comments on the Liberty Utilities 2026-2028 Base Wildfire Mitigation Plan (Liberty's 2026-2028 Base WMP) through August 8, 2025.¹ TAHOE SPARK provided comments timely to Energy Safety regarding Liberty's 2026-2028 Base WMP but was unable to submit the comments to the 2026-2028 Base WMP Docket due to technical difficulties. TAHOE SPARK transmitted the comments directly to Energy Safety via e-mail on August 8, 2025.

TAHOE SPARK's comments are attached to this letter and uploaded to the 2026-2028 Base WMP Docket. Energy Safety is considering stakeholder comments, including TAHOE SPARK's, during the evaluation of Liberty's 2026-2028 Base WMP.

Sincerely,

Nicole Dunlap
Program Manager, Electrical Safety Policy Division
Office of Energy Infrastructure Safety

¹ Second Revised 2026-2028 Base WMP Schedule
(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=58453&shareable=true>).

BEFORE THE OFFICE OF ENERGY INFRASTRUCTURE SAFETY

TAHOE SPARK OPENING COMMENTS ON LIBERTY UTILITIES (CALPECO ELECTRIC) LLC 2026-2028 WILDFIRE MITIGATION PLAN DOCKET: 2026-2028-Base-WMPs

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Date: August 8, 2025

I. INTRODUCTION

TAHOE SPARK, a nonprofit representing Permanent Residents in Liberty Utilities' California service territory, submits these comments on Liberty's 2026–2028 Wildfire Mitigation Plan (WMP) pursuant to the requirements set forth in the Energy Safety Policy Division Process Guidelines (Version 1.0, February 2025). These comments reflect substantial deficiencies in Liberty's current approach to wildfire risk modeling, transparency, and infrastructure equity in a region where tourism-induced demand is both unaccounted for and uncompensated under population based policies.

II. SEASONAL RISK PATTERNS AND MISALIGNED COST RECOVERY

Liberty's territory is distinguished by extreme seasonal variability. According to the Tahoe Transportation District's (TTD) Corridor Plan, over 28 million person trips are made into the Tahoe Basin annually, with July and February surging to 11.8 and 4.7 million visitor trips respectively. These surges drive peak grid stress and amplify wildfire ignition risks during summer, as well as impact winter storm recovery risk and costs.

Despite clear seasonal load signals, Liberty's WMP treats the region as a homogenous population based residential zone. There is no risk segmentation by occupancy type, land use class, or seasonal duration. Permanent Residents—whose energy use is more stable and who remain to respond to emergencies and are affected by those the lasting impacts—are being assigned the costs of infrastructure and mitigation built to serve temporary populations. When wildfires ignite during peak visitor periods, many non-residents evacuate early, leaving Permanent Residents behind to bear the public health consequences from smoke exposure, degraded emergency response capacity, and prolonged disruptions.

Permanent population decline further compounds this imbalance. Kings Beach, for example, has lost over 50% of its resident population since 2000, while second homes and short-term rentals have expanded and increased risks and emergencies that are not population based. This demonstrates a growing disconnect between infrastructure funding responsibility and those driving demand and risk.

III. RECOMMENDATIONS FOR OEIS AND CPUC COORDINATION

We recommend the following technical reforms and oversight practices:

A. Detailed Occupancy-Based Risk Modeling

- Require Liberty to integrate Advanced Metering Infrastructure (AMI), Supervisory Control and Data Acquisition (SCADA), and Geographic Information System (GIS) datasets to model wildfire risk by verified occupancy type (permanent resident, short-term rental, second home, commercial size).
- Seasonal data overlays from the California Department of Transportation (Caltrans), Tahoe Regional Planning Agency (TRPA), TTD SMART mobility tools, or other reasonable data sources should be used to define tourism-induced load shapes and assign corresponding spatial and temporal risk.
- Liberty's current fire risk analysis assumes static population distribution and fails to account for surges in energy load and ignitions caused by visitor-induced behavior. Modeling should disaggregate wildfire ignition probability, peak usage, and infrastructure strain based on verified seasonal occupancy characteristics.
- OEIS should require probabilistic fire spread modeling that accounts for vegetation condition, ambient temperature, visitor density, circuit congestion, and structure age, with outputs calibrated against both historical wildfire data and forecasted growing visitor traffic, including day use from Nevada's growing adjacent day use population.

B. Transparent Infrastructure Project Tracking

- Require geospatial publication of all completed and pending WMP-funded projects, with project-specific risk scores, cost, and verification of installation. Projects must be accompanied by documentation of cost-effectiveness, completion status, and fire risk reduction contribution. Require back up battery programs.
- Mandate reconciliation of forecasted versus completed projects, especially for tree-to-pole replacements, undergrounding, and vegetation management, where Liberty has previously received cost recovery and grants without substantiating performance, cost allocation, or locational accounting yet continues to request additional cost recovery.
- Ensure accountability for delayed or neglected projects, such as tree attachment work that remained incomplete for over four years despite repeated community outreach and safety concerns. One such tree, dead for more than a decade and riddled with woodpecker holes, posed a serious hazard. Firefighters and residents flagged the risk repeatedly, and Liberty staff ultimately acknowledged that removing the service line could cause the tree to collapse onto the home but did not complete the work for more than a year later—underscoring the urgent need for timely, risk-informed infrastructure action.



C. Demand-Driven Cost Attribution Framework

- Recommend that the California Public Utilities Commission (CPUC) utilize rulemaking to develop a Destination Visitor Induced Demand (DVID) fee or fixed seasonal surcharge for wildfire mitigation infrastructure costs.
- The DVID framework should be based on verifiable seasonal occupancy metrics and targeted toward high-impact zones identified through integrated modeling.

D. Return on Equity and Insurance Review

- Support recommendations by the Public Advocates Office (Cal Advocates), Small Business Utility Advocates (SBUA), The Utility Reform Network (TURN), and TAHOE SPARK to reduce Liberty's Return on Equity (ROE) to 9.5%, contingent on demonstrable cost causation alignment and mitigation completion.
- Require full disclosure of Liberty's wildfire insurance procurement terms, premium structures, and risk underwriting assumptions. Liberty's current wildfire insurance cost increase—from \$7.96 million to over \$31 million—should be placed under the Wildfire Expense Memorandum Account (WEMA) for refund review.

E. Enhanced Notification and Coordination Protocols

- Require Liberty to implement multilingual, multi-channel maintenance, PSPS and fire mitigation notification protocols inclusive of Public Utility Districts (PUDs), fire protection districts, public land management agencies, school districts, healthcare providers, and emergency shelters.
- OEIS should mandate simulation exercises and real-time interagency communication plan testing to ensure readiness and cross-jurisdictional collaboration during high-risk periods.

IV. REGIONAL REPRESENTATION AND PLANNING ALIGNMENT

Liberty Utilities operates in a multi-jurisdictional, tourism-dominated geography, yet its wildfire mitigation framework does not reflect the primary sources of risk nor the disproportionate financial burden placed on year-round residents. The current WMP lacks a transparent governance framework that would allow Permanent Residents—who face the ongoing consequences of wildfire exposure, evacuation disruptions, and economic displacement—to meaningfully participate in planning.

OEIS and CPUC must jointly address this equity imbalance by:

- Developing occupancy-sensitive WMP standards that include mandatory disaggregation of fire risk and infrastructure investments by residency type and visitor volume;
- Advancing modeling platforms tailored for Multi-Jurisdictional Investor-Owned Utilities (MJIOUs) not served by the California Independent System Operator (CAISO), with consideration for winter-peaking load and regional isolation;
- Incorporating seasonal tourism, land ownership and recreation/day use risk, communication limitations, and roadway traffic data to prioritize wildfire mitigation investments in accordance with actual use and impact of megaregional growth;
- Requiring Liberty to transparently classify infrastructure built for visitor-serving or commercial expansion separate from residential baseline need, to prevent inappropriate cost and risk shifts.

V. CONCLUSION

Liberty's current WMP perpetuates a pattern of disproportionate cost assignment to full-time residents while failing to address the systemic wildfire risks generated by peak-season visitation. Without occupancy-based modeling, targeted risk attribution, and project-level transparency, the plan cannot achieve equitable or effective outcomes.

OEIS has the authority and analytical framework to correct this trajectory. We urge the Office to adopt and forward these recommendations to CPUC and require that future WMPs by Liberty integrate detailed seasonal modeling, visitor demand cost sharing, and stakeholder-responsive planning processes.

We respectfully request OEIS extend the public comment period for Liberty's WMP and participate in GRC, Residential Demand Fee and rulemaking stakeholder workshops to support a more technically sound and regionally representative fire risk mitigation framework. TAHOE

SPARK requests confirmation of inclusion in the docket service list and will participate in all public workshops and engagement processes relevant to Liberty's wildfire mitigation planning, cost causation, and risk discussions as needed.

Respectfully submitted,

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