



**OFFICE OF ENERGY INFRASTRUCTURE SAFETY**

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Caroline Thomas Jacobs, Director

April 12, 2022

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**SUBJECT: Liberty Utilities 2022 Wildfire Mitigation Plan Data Submittal**

Mr. Parrillo,

Pursuant to Energy Safety's Final 2022 Wildfire Mitigation Plan (WMP) Update Guidelines,<sup>1</sup> adopted on December 14, 2021,<sup>2</sup> utilities are required to submit their 2022 First Quarter (Q1) Quarterly Data Reports (QDRs) by May 1, 2022.

The 2022 WMP Guidelines provided a schedule and instructions for QDR submissions (included in Attachment 5), which required that non-spatial data submissions were to follow the schema of *Attachment 3: 2022 Performance Metrics Data Templates*. Further, the final 2022 WMP Guidelines removed the requirement for utilities to submit updated data, including 2022 and 2023 projections, concurrent with submission of a WMP.

Energy Safety reached out to Liberty Utilities (Liberty) to request that all available spatial and non-spatial data associated with Liberty's 2022 WMP filing be submitted on April 15, 2022. For any data that is not available on April 15, 2022, Energy Safety requested that Liberty submits this as part of its Q1 QDR submission on May 1, 2022. In response to Energy Safety's request, Liberty confirmed that the non-spatial data requirements can be submitted according to the timescale below:

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<sup>1</sup> Energy Safety's Final 2022 WMP Update Guidelines (accessed February 3, 2022):

<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=51912&shareable=true>.

<sup>2</sup> Energy Safety formally adopted the 2022 WMP Update Guidelines on December 14, 2021, during a public meeting held pursuant to Government Code 15475.6. The meeting agenda, slide deck, and a link to the video recording can be found here (accessed February 3, 2022): <https://energysafety.ca.gov/events-and-meetings/events/adoption-of-the-2022-wmp-update-guidelines/>.

<b>WMP non-spatial data requirements</b>	<b>Submission Date</b>
Table 1	4/15
Table 2	5/1
Table 3	4/15
Table 4	4/15
Table 5	4/15
Table 6	5/1
Table 7.1	5/1
Table 7.2	5/1
Table 8	5/1
Table 9	5/1
Table 10	5/1
Table 11	5/1
Table 12	5/1

With respect to spatial data, Liberty confirmed that all Geographic Information Systems (GIS) data will be submitted by May 1, 2022.

Based on the above, Energy Safety does not expect any data to be submitted with Liberty's WMP filing on May 6, 2022 because it will have already been submitted either on April 15 or May 1, 2022. This is providing the data is submitted in the updated format and with the new breakouts (High Fire Threat District (HFTD), non-HFTD) and also includes projections.

Energy Safety appreciates Liberty's cooperation and strict adherence to the timelines set forth above.

Sincerely,



Lucy Morgans  
Program Manager, Electric Safety Policy Division  
Office of Energy Infrastructure Safety