

**BEFORE THE OFFICE OF ENERGY INFRASTRUCTURE SAFETY  
DOCKET 2020-SVM**

**LIBERTY UTILITIES (CALPECO ELECTRIC) LLC (U 933-E) 2020 SUBSTANTIAL  
VEGETATION MANAGEMENT AUDIT CORRECTIVE ACTION PLAN**

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Pursuant to the Office of Energy Infrastructure Safety’s (“OEIS”) Audit on Liberty’s Substantial Vegetation Management (“SVM”) Work in 2020, Liberty Utilities (CalPeco Electric) LLC (“Liberty”) submits this 2020 SVM Audit Corrective Action Plan.

**I. LIBERTY RESPONSE AND CORRECTIVE ACTIONS FOR LIBERTY WILDFIRE  
MITIGATION PLAN INITIATIVE 5.3.5.5**

In its audit of Liberty’s 2020 SVM work, OEIS included the following Finding and Corrective Actions related to Liberty Wildfire Mitigation Plan (“WMP”) Initiative 5.3.5.5: Fuel Management and Reduction of “Slash” from Vegetation Management Activities:

<b>Finding</b>	<b>Corrective Action</b>
1. Liberty failed to provide either a list of attendees or the dates of the workshops it hosted in 2020, beyond one annual Tahoe Fire and Fuels Team Workshop, to assist in the development of a fuel reduction and wood removal program that will reduce fire risk and benefit the local community and surrounding forest.	Liberty shall a) confirm whether it hosted any workshops besides the annual Tahoe Fire and Fuels Team Workshop provided, b) provide an explanation why it failed to provide the list of attendees and the dates of the workshop(s) it hosted in 2020, and c) detail Liberty’s process to ensure vegetation management operations are consistent with statements made in this initiative of the WMP.

Liberty has complied with this initiative. The stated purpose of the initiative is to plan and execute fuel management activities that reduce the availability of fuel in proximity to potential sources of ignition from vegetation management activities. Liberty provided several documents throughout the audit process to validate the veracity of statements made in its 2020 WMP, and Energy Safety reported multiple examples of findings to confirm the progress Liberty made to reduce fuel loads near utility assets. The single point of discrepancy is a forward-looking statement that was made regarding hosting workshops

with local subject matter experts. In its 2020 WMP, Liberty discussed the need to develop a methodology for fuels treatment that would align more closely with wildfire mitigation objectives and the joint goals of agency partners and the local community. Liberty planned to work with the local and state agency land managers and the local community to develop new fuel management treatments and intended to host workshops with the same stakeholders to assist in the development of a fuel reduction and wood removal program. Energy Safety found that Liberty did work with local agencies and the community to develop new standards for fuel reduction and slash treatment; however, due to circumstances that were unforeseeable when the 2020 WMP was developed, Liberty was unable to host workshops in 2020. These circumstances that were impossible to predict include the onset of a global pandemic and lock-down orders that required Liberty to close its offices for most employees in March 2020, with offices only recently reopened in summer 2022. Thus, Liberty was also not able to host in-person and in-field workshops throughout 2020. Liberty should not be penalized for a failure to anticipate a global pandemic and its resulting lockdowns. Notwithstanding pandemic conditions, Liberty has made significant progress collaborating with property owners and land managers to reduce the availability of fuel and has met the intent of the initiative as presented in Liberty's 2020 WMP and as defined by the 2020 WMP Guidelines.

Liberty provides the below responses to the specific Corrective Actions for this initiative:

a) Liberty did not host additional workshops aside from the annual Tahoe Fire and Fuels Team Workshop.

b) Liberty did not host additional workshops aside from the annual Tahoe Fire and Fuels Team Workshop and thus does not have a list of attendees and dates of additional workshops.

c) Liberty will continue to provide updates consistent with the best knowledge available at the time. To the extent vegetation management operations for this initiative are not precisely consistent with statements made in its WMP, for such reasons as an unforeseen global pandemic, Liberty will provide an

update and explanation in Section 5.3.5.5 of its WMP on its progress related to statements made in the prior year’s WMP.

**II. LIBERTY RESPONSE AND CORRECTIVE ACTIONS FOR LIBERTY WMP INITIATIVE 5.3.5.15**

In its audit of Liberty’s 2020 SVM work, OEIS included the following Findings and Corrective Actions related to Liberty WMP Initiative 5.3.5.15: Remediation of At-Risk Species:

<b>Finding</b>	<b>Corrective Action</b>
2i. Liberty targeted treating 380 miles under this initiative in its approved 2020 WMP, but Liberty’s fourth quarter QIU for 2020 stated Liberty targeted 230 miles.	Liberty shall a) explain why there is a discrepancy between Liberty-submitted documents, the 2020 WMP and the fourth quarter 2020 QIU regarding the applicable target for this initiative, b) specify whether Liberty followed Energy Safety’s established “Change Order” process to initiate such a target change, and if not, explain why, and c) detail Liberty’s process to ensure the initiative targets claimed are consistent across all reporting documents such as, but not limited to, the WMP and the QIU.
2ii. Liberty failed to provide documentation supporting completion of 380 miles under this initiative in its 2020 WMP.	Liberty shall a) provide an explanation why it was unable to provide supporting documentation in a way that allowed Energy Safety to confirm target completion, and b) detail Liberty’s process to ensure vegetation management record keeping practices (for Liberty staff and its contractors) allow for cross-confirmation against targets claimed in documents and reports provided to Energy Safety.

Liberty provides the below responses to the specific Corrective Actions for this initiative:

2i.a) Liberty’s 2020 WMP set a target of 380 miles to be treated for remediation of at-risk species, and explains that Liberty was unable to separate costs between initiatives related to pruning trees for line clearance (WMP Initiative 5.3.5.16) and trees removed for strike potential (WMP Initiative 5.3.5.20). The 380 target miles under this initiative in its approved 2020 WMP is inclusive of all tree work Liberty projected completing for the year. The California Public Utilities Commission (“CPUC”) Wildfire Safety

Division's Guidance Resolution WSD-002 ("Resolution") on Liberty's 2020 WMP was clear in its directive that such aggregation was a deficiency that needed to be corrected per Section 5.4.3. Aggregation of Initiatives (Guidance-5, Class B). Resolution WSD-002 further provided the Condition that programs outlined in Section 5.3 of Liberty's WMP were to be disaggregated and reported individually for each initiative. Later guidance in WSD Guidance on the Remedial Compliance Plan & Quarterly Report Process Set Forth in Resolution WSD-002 included the requirement that Liberty satisfy the requirements of WSD-002 Condition Guidance-5 with the filing of a Quarterly Report. Liberty's fourth quarter Quarterly Initiative Update ("QIU") for 2020 was the first quarterly report in which the deficiency identified in Guidance-5 was resolved.

2i.b) Due to the understanding that Liberty was not initiating a change to its WMP, but satisfying the requirements of WSD Order, Liberty did not recognize the Quarterly Report as a "Change Order" per Section 5.6 of the Resolution.

2i.c) Liberty will continue to provide updates in accordance with the current guidance provided by OEIS. To the extent vegetation management initiative targets claimed in its WMP change based on OEIS guidance or internal considerations, Liberty will provide updates and explanations across all reporting documents, including its QIU filings and in Section 5.3.5 of its annual WMP filing.

2ii.a) Energy Safety recognizes the lack of precedent by which the SVM Audit was executed and expects further refinement as it continues to develop the process by which Liberty can expect to be evaluated. The 2020 SVM Audit of Liberty is the first time Energy Safety specified the need for Liberty to provide documentation to support the aggregate of initiatives into the broader program. Liberty was operating under the assumption that data was to be reported pursuant to the requirements of the updated guidance and quarterly report process set forth in Resolution WSD-002 and WSD Guidance on the Remedial Compliance Plan & Quarterly Report Process Set Forth in Resolution WSD-002.

2ii.b) Liberty will continue to evaluate and update its record keeping practices to better allow for tracking progress against targets and looks forward to continued collaboration with Energy Safety as it seeks to improve the audit process, which will in turn afford Liberty the ability to provide documentation of its program achievements with a greater level of consistency.

### **III. CONCLUSION**

Liberty appreciates this opportunity to provide its 2020 SVM Audit Corrective Action Plan and looks forward to continuing to work with OEIS to help reduce the risk of wildfires.

Respectfully submitted,

*/s/ Jordan Parrillo*

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