

**BEFORE THE OFFICE OF ENERGY INFRASTRUCTURE SAFETY
DOCKET 2023 WMP**

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

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Pursuant to the Office of Energy Infrastructure Safety (“OEIS”) Final 2023 Wildfire Mitigation Plan (“WMP”) Guidelines, Liberty Utilities (CalPeco Electric) LLC (“Liberty”) respectfully submits this reply to party comments on Liberty’s 2023 WMP. These comments respond to the recommendations to OEIS made by the Public Advocates Office (“Cal Advocates”), the Green Power Institute (“GPI”), and the California Department of Fish and Wildlife (“CDFW”).

I. REPLY TO CAL ADVOCATES’ COMMENTS

In Opening Comments, Cal Advocates makes several recommendations specific to Liberty’s 2023 WMP for the OEIS to consider. Liberty addresses these recommendations below.

A. Cal Advocates’ recommendations for Liberty to file a revised 2023 WMP should not be adopted.

Cal Advocates recommends that Liberty file a revised 2023 WMP that addresses issues related to Liberty’s asset inspection QA/QC program and Liberty’s detailed asset inspection program. Liberty should not be required to file a revised 2023 WMP based on the reasons provided by Cal Advocates.

First, Cal Advocates recommends that Energy Safety should direct Liberty to provide a plan in a revised 2023 WMP filing to increase its rate of QA/QC for asset inspections to a minimum of greater than its 2022 target of 0.5 percent. Liberty has already provided revised QA/QC targets in its 2023 for its asset inspection QA/QC programs in *Table 8-10: Liberty Asset Inspection QA/QC Program Sample Size and Units* of its 2023 WMP. For instance, Liberty’s sample size for detailed inspections of its overhead

system is 12 percent. Liberty’s target for its asset inspection QA/QC program is also provided in *Table 8-4: Liberty Asset Inspections Targets by Year* of its 2023 WMP.

Next, Cal Advocates recommends that Energy Safety should direct Liberty to provide target pass/fail rates for its asset inspection QA/QC program in a revised 2023 WMP filing. Liberty will provide target pass/fail rates for its asset inspection QA/QC program in subsequent WMP filings as soon as they are established. Liberty expects it to take two years of program implementation and data collection to determine the appropriate metrics and scoring criteria to measure performance, including establishing an Acceptable Quality Level (“AQL”) and Conformance Rate (“CR”).

Last, Cal Advocates recommends that Energy Safety should direct Liberty to file a revised WMP that describes Liberty’s plan to maintain the safety of its system while detailed asset inspections are halted. While Liberty will not be conducting detailed asset inspections on its overhead system in 2023, Liberty will remain in compliance with General Order 165 requirements and does not agree with Cal Advocates contention that “Liberty will effectively blindfold itself to discovery of potentially critical vulnerabilities for all of 2023.” Liberty will be performing detailed inspections on its underground system in 2023. Additionally, Liberty will be monitoring its system as part of its 2023 Resiliency Project, which will impact 15 feeders, or one-third of Liberty’s circuits. Liberty will also be performing patrol inspections of its entire system in 2023 and will continue to make repairs and replace poles across both Tier 2 and Tier 3 areas in its service territory in 2023.

B. Cal Advocates’ recommendations regarding additional quarterly reporting should not be adopted.

Cal Advocates recommends that Liberty include additional information in quarterly reporting to OEIS, particularly regarding its risk modeling and progress toward developing and implementing a risk-based decision-making framework. Liberty will continue to include information on its progress in risk modeling and implementing a risk-based decision-making framework in its annual WMP filings, as

required by OEIS guidelines. Additional quarterly reporting requirements should not be adopted. The WMP quarterly reporting requirements are established through the OEIS Data Guidelines, and new requirements should be considered and adopted through that process.

C. Cal Advocates’ recommendation regarding mitigating the potential harms of de-energization by NV Energy is unclear and should not be adopted.

Cal Advocates recommends that Energy Safety should direct Liberty to create a plan to mitigate the potential harms of de-energization by NV Energy. Cal Advocates contends that Liberty has not provided strategies for mitigating Public Safety Outage Management (“PSOM”) de-energizations from NV Energy and that there are actions that Liberty must take if NV Energy does make the decision to de-energize.¹ To be clear, NV Energy’s de-energization decision-making regarding PSOM events is at NV Energy’s sole discretion as the power provider to Liberty.

Liberty agrees that there are actions that it must take if NV Energy does make the decision to de-energize. Liberty does have plans to mitigate the impact to customers of these decisions, if possible. To the extent possible, Liberty will follow PSPS communications protocols if an NV Energy PSOM event impacts Liberty’s power lines and customers. Additionally, throughout the year, Liberty will engage and share best practices with NV Energy in the following ways:

- Outline communication timelines between NV Energy and Liberty during a possible PSOM event that would impact Liberty’s electric system; and
- Actively participate in NV Energy PSOM exercises.

II. REPLY TO GPI COMMENTS

In its opening comments, GPI makes several recommendations specific to Liberty’s 2023 WMP. Liberty addresses these recommendations below.

¹ Public Advocates Office Comments on Liberty 2023 WMP, p.17.

A. GPI's recommendation to file a revised 2023 WMP should not be adopted.

GPI recommends that Liberty submit a revised 2023 WMP because the link between updated risk modeling approaches, tools, and outputs and mitigation selection and prioritization are not well defined. GPI specifically recommends that Liberty develop a more comprehensive timeline and stepwise plan for developing specific risk modeling and assessment application capabilities.² Liberty will include a comprehensive timeline and plan for developing its risk modeling and risk-based decision-making capabilities in future WMP submissions. However, Liberty should not be required to file a revised 2023 WMP. As explained in its 2023 WMP, Liberty has made considerable advances in its wildfire risk modeling since the issuance of the OEIS Final 2023-2025 WMP Guidelines on December 6, 2022. Liberty is in the process of examining and analyzing its risk modeling outputs thus far to determine how best to inform decision-making and operational processes, which follows OEIS guidelines that not all risk assessment calculations and assessments need to be complete prior to the 2023 WMP submission. Furthermore, GPI's recommendation that Liberty file a revised 2023 WMP will literally divert Liberty resources away from the risk modeling improvements GPI recommends.

B. GPI's statement about lack of long-term risk mitigation progress in Liberty's high- and very-high-risk circuits is unfounded.

GPI states that it is most concerned with the lack of long-term risk mitigation progress in Liberty's high- and very-high-risk circuits located in the southern and northern areas of the Tahoe Basin and that it appears this trend will continue through the current three-year WMP cycle.³ GPI is wrong. Liberty has presented its plan in its 2023 WMP submission. To more effectively make timely improvements to its wildfire mitigation efforts, Liberty has added traditional overhead replacements and an expanded Sensitive Relay Profile program. Liberty continues to plan and complete its wildfire

² GPI Comments on SMJU WMPs, p.22.

³ GPI Comments on SMJU WPMs, p.32.

mitigation efforts with a continued focus on high and very- high risk circuits. For conventional overhead replacement projects, Liberty is currently targeting its highest risk circuit, the Topaz 1261 circuit. Three projects on that circuit have been completed in 2023: Cunningham, Larson, and Eastside. Additional projects for the Topaz 1261 circuit are being planned for 2024 and beyond. For covered conductor projects, Liberty intends to complete four projects in 2023: Celio A, Celio B, 7300 Phase 7, and 7300 Phase 8. The Celio projects are on a portion of the Meyers 3300 circuit, and the 7300 projects are a portion of the Tahoe City 7300 circuit. Both circuits are listed within the top six riskiest circuits based on Liberty’s most recent circuit risk assessment presented in Table 6-7: Liberty Top-Risk Circuits. In 2024, the planned covered conductor projects are the Fallen Leaf B, Angora, and 7300 Phase 9 projects. In 2025, the planned covered conductor projects are the Fallen Leaf C, Fallen Leaf D, and 7300 Phase 10 projects. The Fallen Leaf and Angora projects are portions of the 3400 circuit, which ranks as the third-highest risk circuit. The 7300 circuit is ranked as the fourth-highest with respect to risk. Liberty is also focused on high-risk circuits for other wildfire mitigation initiatives, including pole replacements and sensitive relay profiles.

III. REPLY TO CDFW COMMENTS

CDFW states that Liberty included a good discussion of procedures and processes for environmental compliance, including permitting roadblocks, and when consultation with environmental regulatory agencies occurs. Recommendations provided by CDFW include:

- Provide additional language in Section 5.4.5 to discuss environmental compliance measures related to vegetation management activities
- Clearly identify which agencies need to be consulted for review and approval of Plan activities to maintain compliance with Fish and Game Code

- Early consultation with CDFW by Liberty’s environmental and planning staff and early completion of all documentation necessary for CDFW’s discretionary review of activities covered under the Plan.

Liberty agrees with CDFW’s recommendations and will include language in its next annual WMP filing to update and clarify its WMP based on the comments provided.

IV. 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,

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