

**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”) Issuance of Revision Notice for Liberty’s 2023-2025 Wildfire Mitigation Plan (“WMP”), Liberty Utilities (CalPeco Electric) LLC (“Liberty”) respectfully submits this reply to party comments on Liberty’s Revised 2023-2025 WMP. 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 on Liberty’s Revised 2023-2025 WMP, Cal Advocates makes recommendations specific to Liberty’s Revised 2023-2025 WMP for OEIS to consider. Liberty addresses several of these recommendations below.

A. Cal Advocates’ recommendation for additional quarterly reporting on Liberty’s wildfire risk modeling efforts should not be adopted.

Cal Advocates recommends that OEIS require Liberty to provide quarterly updates starting in Q4 2023 on its wildfire risk model transition. Cal Advocates’ recommendation for additional quarterly reporting is unnecessary and duplicative of ongoing efforts through the monthly OEIS Risk Modeling Working Group (“RMWG”) meetings. Liberty actively participates and provides extensive updates on selected risk modeling topics to stakeholders and OEIS through the RMWG meetings. Liberty also provides updates on its progress in risk modeling and implementing a risk-based decision-making framework in its annual WMP filings, as required by OEIS guidelines. The additional quarterly reporting recommended by Cal Advocates would create unnecessary interim reporting and will require

Liberty's limited resources to allocate their time to reporting each quarter instead of working on the necessary improvements to its increasingly sophisticated risk modeling efforts. Cal Advocates' recommendation for additional quarterly reporting on Liberty's wildfire risk modeling should not be adopted.

B. Cal Advocates' recommendation that OEIS should require Liberty to perform and submit additional analyses prior to final approval of Liberty's 2023-2025 WMP should not be adopted.

Cal Advocates states that Liberty's response to Critical Issue RN-LU-23-03 is incomplete and that Liberty's Revised 2023-2025 WMP does not comply with the OEIS Revision Notice. Specifically, Cal Advocates states that Liberty does not provide adequate analysis that compares options that Liberty could have applied to address its backlog of past-due asset work orders and that Liberty fails to examine the risk implications from reducing detailed asset inspections in 2023. Cal Advocates recommends that Liberty should be required to submit the two completed analyses prior to final approval of Liberty's 2023-2025 WMP. Contrary to Cal Advocates' assertion, Liberty's Revised 2023-2025 WMP does adequately address Critical Issue RN-LU-23-03 and Cal Advocates recommendation for additional analysis prior to approval of Liberty's 2023-2025 WMP should not be adopted.

In its Revised 2023-2025 WMP, Liberty explains that its decision to expedite the process to reduce its backlog of open work orders considered the following factors:

- Liberty planned to continue its detailed underground inspections in 2023.
- Liberty's full system survey completed in 2020 included all overhead lines that are normally inspected over a five-year period. Liberty will remain compliant with General Orders 95 and 165 during 2023 without completing any overhead detailed inspections.
- Liberty's assessed the safety risk of halting detailed overhead inspections in 2023 as minimal. In addition to previous inspections and repair work, Liberty will monitor its

system as part of its 2023 Resilience Project, which will impact 15 feeders, or one-third of Liberty's circuits. Liberty will also continue to make repairs and replace poles across both Tier 2 and Tier 3 areas in its service territory in 2023.

- Liberty's 2023 staffing has complied with asset management and inspection regulatory requirements and WMP implementation. Thus, Liberty did not attempt to obtain additional asset management workforce in 2023. As work on Liberty's Resilience Project concludes in 2023, resources will shift toward completing open and past due work orders.
- Liberty plans to complete repairs and associated work from its backlog of work orders by December 31, 2025.

Additionally, Liberty did complete some detailed overhead asset inspections that were not targeted in 2023. As reported in Liberty's Quarter 3 ("Q3") 2023 Quarterly Data Report ("QDR"), Liberty completed 167.65 miles of detailed inspections in Q3 2023, including 53 miles of overhead asset inspections. These additional unplanned detailed overhead asset inspections were targeted towards areas of Liberty's system in which the existing data from the 2020 System Survey is incomplete.

II. REPLY TO GPI COMMENTS

In Opening Comments on Liberty's Revised 2023-2025 WMP, GPI makes recommendations specific to Liberty's Revised 2023-2025 WMP for OEIS to consider. Liberty addresses one of GPI's recommendations below.

- A. Liberty clarifies that it does not plan to replace the current-limiting fuses that the vendor suggested should not be installed due to failures in the field (S&C Fault Tamers) with traditional expulsion fuses. Liberty will replace the S&C Fault Tamers with non-expulsion fuses (Expulsion Limiting Fuses produced by Eaton).**

GPI recommends that Liberty must clarify whether it still plans to replace the current-limiting fuses that the vendor suggested should not be installed due to failures in the field (S&C Fault Tamers) with traditional expulsion fuses. Liberty clarifies that it will not replace the S&C Fault Tamers with traditional expulsion fuses, and, as stated in its Revised 2023-2025 WMP, Liberty will replace the S&C Fault Tamers with Expulsion Limiting Fuses (“ELFs”) produced by Eaton, which are non-expulsion fuses. Also, as stated in its Revised 2023-2025 WMP, Liberty has installed 3,052 ELFs through Q3 2023. As Liberty continues to work toward a goal of zero expulsion fuses in its system, Liberty can utilize its Sensitive Relay Profile (“SRP”) program on higher fire threat days to reduce the ignition risk from expulsion fuse by using reclosers and breakers with fast trip settings that will trip faster than the fuses.

III. CONCLUSION

Liberty appreciates this opportunity to respond to stakeholder 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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