

**BEFORE THE OFFICE OF ENERGY INFRASTRUCTURE SAFETY  
DOCKET 2023-2025-WMPs**

**COMMENTS OF LIBERTY UTILITIES (CALPECO ELECTRIC) LLC (U 933-E) ON OFFICE  
OF ENERGY INFRASTRUCTURE SAFETY DRAFT DECISION ON LIBERTY 2023-2025 WMP**

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January 11, 2024

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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 these comments on the OEIS Draft Decision on Liberty 2023-2025 WMP (OEIS Draft Decision).

**I. FIGURE 5.2-1 IN THE OEIS DRAFT DECISION IS INCORRECT FOR LIBERTY’S SERVICE TERRITORY.**

Figure 5.2-1: Cross-Utility Miles of Overhead Distribution Lines is incorrect in the OEIS Draft Decision. The figure appears to correlate to Table 5-2: Overview of Key Liberty Electrical Equipment in Liberty’s 2023-2025 WMP. However, the breakdown in the OEIS Draft Decision of the number of miles of distribution lines in high-fire threat districts (HFTD) and non HFTD does not correlate to the information Liberty’s provided in Table 5-2 of its 2023-2025 WMP. OEIS should revise Figure 5.2-1 to reflect the information provided in Table 5-2 of Liberty’s 2023-2025 WMP.

**II. THE OEIS DRAFT DECISION MISSTATES THAT LIBERTY REPORTED ONE CATASTROPHIC WILDFIRE THAT WAS ATTRIBUTED TO ITS FACILITIES OR EQUIPMENT FROM 2015-2022.**

In its Final 2023 WMP Guidelines, OEIS states that in Section 5.3.2, electrical corporations must report information on electrical corporation ignited catastrophic wildfires, including “catastrophic wildfire ignitions reported to the CPUC that may be attributable to facilities or equipment owned by the electrical corporation and where the cause of the ignition is still under investigation.”<sup>1</sup> Based on these OEIS

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<sup>1</sup> OEIS 2023-2025 Wildfire Mitigation Plan Technical Guidelines, December 6, 2022, page 19.

guidelines, Liberty reported that in the past 20 years, Liberty has experienced one catastrophic wildfire in its service territory that fits the criteria defined by OEIS and that the cause of ignition for that wildfire is still under investigation.<sup>2</sup> However, in the OEIS Draft Decision, OEIS states that “Liberty reported one catastrophic wildfire that was attributed to its facilities or equipment from 2015-2022.” This statement is incorrect, as Liberty reported one catastrophic wildfire in its service territory over the past 20 years, in which the cause of ignition is still under investigation. OEIS should revise the statement in its final decision to state, “Liberty reported one catastrophic wildfire in its service territory that fits the criteria defined by OEIS; the cause of ignition for that wildfire is still under investigation.”

### **III. LIBERTY HAS COMPLETED ALL PAST DUE VEGETATION MANAGEMENT WORK ORDERS AS OF JANUARY 2024.**

The Area for Continued Improvement LU-23-17 requires Liberty to report progress toward eliminating past-due vegetation management work orders and to provide a plan and timeline for eliminating the past-due work orders. As reported in Liberty’s Quarter 3 WMP Quarterly Data Report (“QDR”), Liberty had seven work orders identified as past due at the end of Quarter 3. As of January 2024, those seven work orders have been completed. Liberty has met the required progress for Area for Continued Improvement LU-23-17 and can provide this information in its 2025 WMP Update.

### **IV. THE REQUIRED PROGRESS FOR AREA FOR CONTINUED IMPROVEMENT LU-23-10 IS NOT CLEAR.**

The Area for Continued Improvement LU-23-10 requires Liberty to either develop a plan to increase its detailed asset inspections in higher wildfire risk areas or demonstrate that its existing inspection program adequately addresses risk by analyzing the number of Level 1 or critical issues found during detailed inspections. Liberty does not understand how an analysis of Level 1 or critical issues found during detailed inspections would support the decision to maintain its detailed asset

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<sup>2</sup> 2023-10-06\_Liberty\_2023\_WMP\_R2, October 6, 2023, page 40.

inspection frequency at General Order frequencies. It appears that the OEIS-required progress for this analysis is incomplete. Liberty requests that OEIS clarify its expectations for this analysis with further information and guidance.

**V. CONCLUSION**

Liberty appreciates this opportunity to comment on the OEIS Draft Decision and looks forward to working with OEIS and other stakeholders to mitigate the risk of wildfires in California.

Respectfully submitted,

*/s/ Jordan Parrillo*

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