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May 28, 2024

VIA OEIS E-FILING

OEIS Docket No. 2023-2025-WMPs

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Pursuant to The Office of Energy Infrastructure Safety's 2023-2025 WMP Process and Evaluation Guidelines, Liberty Utilities (CalPeco Electric) LLC ("Liberty") respectfully submits this Change Order Request for our 2023-2025 Wildfire Mitigation Plan ("WMP") in accordance with the guidance provided by the Office of Energy Infrastructure Safety ("Energy Safety") in the 2023-2025 WMP Process and Evaluation Guidelines. The submission consists of the following:

- Summaries and explanations of the proposed changes for 2024; and
- Proposed quarterly targets for 2024 WMP initiatives.

If you have any questions or require additional information, please contact me at:

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Liberty Utilities
2024 WMP Update Change Order Request

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1. Change Order

The Office of Energy Infrastructure Safety (“Energy Safety”) issued a final decision approving Liberty’s 2023-2025 Base Wildfire Mitigation Plan (“WMP”) on February 5, 2024. Energy Safety’s 2023-2025 WMP Process and Evaluation Guidelines (“Energy Safety Guidelines”) allow utilities to seek changes to approved mitigation initiatives as they gain experience and assess outcomes.¹ The Energy Safety Guidelines state that a utility must request a change order as soon as practicable after the WMP is approved and the utility determines a change is warranted.² One of the criteria specified in the Energy Safety Guidelines that would necessitate a change order is if the change represents a significant shift in either the strategic direction or purpose of an initiative.³ The Energy Safety Guidelines also allow utilities to update quarterly initiative targets for 2024 initiatives to assist in adjusting to the year-ahead approach.⁴

The change order process allows utilities to assess and update the most effective and efficient approach to mitigating its wildfire risk and acknowledges that approaches described in WMPs could change as utilities gain experience and assess outcomes. Pursuant to the change order process, Liberty requests approval of updated 2024 targets for seven WMP initiatives that Liberty considers significant changes per the Energy Safety Guidelines. Liberty also provides updated quarterly initiative targets for 2024 for 13 WMP initiatives.

¹ Office of Energy Infrastructure Safety 2023-2025 Wildfire Mitigation Plan Process and Evaluation Guidelines, Revised, January 2024, p. 22.

² *Id.* at p. 23.

³ *Id.*

⁴ *Id.* at p. 24.



1.1 Changes for 2024 WMP Initiatives

Liberty requests to update seven of its WMP initiative targets for 2024:

2024 WMP Initiative Target Update Requested	2024 Original Target	2024 Updated Target
Covered conductor installation	5.61 miles	3.9 miles
Undergrounding of electric lines and/or equipment	1.3 miles	0.0 miles
Traditional overhead hardening	2.0 miles	3.5 miles
Microgrids	1 microgrid	0 microgrids
Installation of system automation equipment	8 automatic reclosers	4 automatic reclosers
Line removal (in HFTD)	1.1 miles	0.0 miles
Equipment settings to reduce wildfire risk	-	15 circuits with SRP

1.1.1 Covered Conductor Installation (WMP-GDOM-GH-01)

The proposed target change for Covered Conductor Installation in 2024 is a reduction from 5.61 miles to 3.9 miles. The target reduction is due to a change in strategic direction that will prioritize Liberty’s Sensitive Relay Profile (“SRP”) Program as an expedited wildfire mitigation during the current WMP cycle. Liberty expects to cover more of its system with SRP over a shorter time and anticipates that this change will reduce wildfire risk within the current WMP cycle. Liberty will continue to assess and pursue covered conductor installation as a long-term wildfire mitigation initiative. Additionally, Liberty increased its traditional overhead hardening WMP initiative target from 2.0 miles to 3.5 miles as an offset of the reduced covered conductor installation.

Liberty forecasts capital expenditures to be reduced from \$8,627,427 to \$7,859,881 for the 2024 WMP year.

1.1.2 Undergrounding of Electric Lines and/or Equipment (WMP-GDOM-GH-02)

The proposed target change for Undergrounding of Electric Lines in 2024 is a reduction from 1.3 miles to 0.0 miles. The target reduction is due to a change in strategic direction based on project delays and permitting issues. In 2023, Liberty was unable to find a civil contractor that would meet the budget for the Tahoe Vista Rule 20 project planned for 2023. Liberty has adjusted its undergrounding plans to focus on the Tahoe Vista Rule 20 project during the current WMP cycle. Liberty is currently working with Placer County, CalTrans, and Civil Contractors to replan the project scope to fit the budget for a 2025 build. Liberty is also working



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through permitting and traffic control issues. CalTrans has indicated that a 2025 build could be challenging to permit due to traffic control issues.

Liberty forecasts capital expenditures to be reduced from \$8,482,680 to \$0 for the 2024 WMP year.

1.1.3 Traditional Overhead Hardening (WMP-GDOM-GH-05)

The proposed target change for Traditional Overhead Hardening in 2024 is an increase from 2.0 miles to 3.5 miles. The target increase is due to a change in strategic direction that will increase traditional overhead hardening work as Liberty prioritizes its SRP Program as an expedited wildfire mitigation during the current WMP cycle and reduces covered conductor installation. Liberty expects to complete more traditional overhead hardening at lower cost compared to covered conductor installation. Liberty will continue to assess and pursue both as long-term wildfire mitigation initiatives. Based on assessments of WMP initiatives, traditional overhead hardening is a preferred method where there is additional space and less vegetation in parts of Liberty's service territory. Liberty anticipates that a similar risk reduction can be achieved with traditional overhead hardening when wide cross arms, additional poles to reduce span lengths, and modern build methods are possible.

Liberty forecasts capital expenditures to increase from \$2,068,318 to \$3,500,000 for the 2024 WMP year.

1.1.4 Microgrids (WMP-GDOM-GH-07)

The proposed target change for Microgrids in 2024 is a reduction from 1 microgrid project to 0 microgrid projects. The target reduction is due to a change in strategic direction that will replace the planned microgrid project with a covered conductor installation project planned for 2024. Upon further assessment of the planned microgrid project, the expected size, costs, and lead times for the microgrid were higher than anticipated. Liberty expects that it will complete the planned covered conductor project in a shorter amount of time than the planned microgrid project would have taken to complete, and thus can reduce the associated risk in a shorter amount of time.

Liberty forecasts capital expenditures to be reduced from \$1,500,000 to \$0 for the 2024 WMP year.



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1.1.5 Installation of System Automation Equipment (WMP-GDOM-GH-08)

The proposed target change for Installation of System Automation Equipment in 2024 is a reduction from 8 automatic reclosers to 4 automatic reclosers. The target reduction is due to Liberty's assessment of this WMP initiative in 2023. Liberty's initial 2023 target of 8 automatic reclosers was an estimation of the number of reclosers that would be established as part of Liberty's initial SRP program targeted for 10 circuits. After completion of an SRP study conducted by the University of Nevada at Reno ("UNR") for Liberty in 2023 and evaluation of the study recommendations by Liberty's operations teams, Liberty determined that there is not value beyond 5 reclosers for the initial SRP program. Similarly, Liberty's 2024 target of 8 automatic reclosers was an estimation of the number of reclosers that would be established as part of Liberty's SRP program in 2024. Liberty proposes to adjust its 2024 target for automatic recloser installation to be more consistent with the 2023 UNR Study results. Liberty will confirm the 2024 target for automatic reclosers subsequent to receiving the results of the 2024 UNR Study.

Liberty forecasts capital expenditures to be reduced from \$1,200,000 to \$600,000 for the 2024 WMP year.

1.1.6 Line Removal in HFTD (WMP-GDOM-GH-09)

The proposed target change for Line Removal in HFTD in 2024 is a reduction from 1.1 miles to 0.0 miles. The target reduction is due to a change in strategic direction that will replace a planned microgrid project with a covered conductor installation project planned for 2024 and thus the line removal that was planned as part of the microgrid project will not occur in 2024 as planned.

Liberty forecasts capital expenditures to be reduced from \$500,000 to \$0 for the 2024 WMP year.

1.1.7 Equipment Settings to Reduce Wildfire Risk (WMP-GDOM-GO-01)

Liberty proposes to establish a target for Equipment Settings to Reduce Wildfire Risk in 2024 to represent its SRP program implementation. Liberty proposes to establish a target of 15 circuits with SRP enabled in 2024. The establishment of this target is due to a change in strategic



direction that will prioritize Liberty’s SRP Program as an expedited wildfire mitigation during the current WMP cycle.

Liberty forecasts capital expenditures to increase from \$150,000 to \$800,000 for the 2024 WMP year.

1.2 2024 WMP Initiative Quarterly Targets

Per the Energy Safety Guidelines, Liberty requests to establish or update quarterly targets for 13 WMP initiatives for 2024:

2024 WMP Initiative Quarterly Target Requested	Quarter 2 2024 Target ⁵	Quarter 3 2024 Target ⁶
Detailed inspections of distribution electric lines and equipment	88 miles	176 miles
Intrusive pole inspections	0 poles	1,151 poles
Patrol inspections of distribution electric lines and equipment	589 miles	589 miles
Other discretionary inspections of distribution electric lines and equipment	0.6 miles	1.0 mile
Quality assurance / quality control of inspections	0% of detailed inspections	6% of detailed inspections
Substation inspections	24 substations	38 substations
Vegetation Management Inspection Program - Detailed	110 miles	165 miles
Vegetation Management Inspection Program - LiDAR	-	700 miles
Pole Clearing	700 poles	3,000 poles
Substation Defensible Space	12 substations	12 substations
Clearance	500 miles	700 miles
Fall-In Mitigation	70 miles	150 miles
Quality Assurance and Quality Control	120 miles	229 miles

⁵ Quarterly targets are cumulative.

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