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June 12, 2024

DATA REQUEST RESPONSE

LIBERTY UTILITIES (CALPECO ELECTRIC) LLC Data Request OEIS-P-CO_2024-LU-001

Requesting Party: Office of Energy Infrastructure Safety
Originator: Sara S. Moore, Sr. Wildfire Safety Analyst
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Subject: Liberty 2024 Change Order Request
Date Received: June 7, 2024
Due Date: June 12, 2024

REQUEST NO. 1:

Regarding Liberty's Covered Conductor Installation (WMP-GDOM-GH-01) Target:

In Liberty's Change Order Request for Liberty Utilities' 2023-2025 Wildfire Mitigation Plan (May 2024) (2024 Change Order Request), Liberty requested a decrease in its Covered Conductor Installation target from 5.61 miles to 3.9 miles.

- a. Provide Liberty's estimate of the percent change in the 2024 overall system risk resulting from this target decrease.
- b. Does Liberty plan to install in 2025 the 1.71 miles removed from scope in 2024?

RESPONSE TO REQUEST NO. 1:

- a. Liberty does not currently have sufficient information to calculate the percent change in 2024 overall system risk resulting from this target decrease.
- b. Of the 1.71 miles removed from scope in 2024, Liberty plans to complete the Fallen Leaf D Covered Conductor Project (0.8 miles) in 2025.

REQUEST NO. 2:

Regarding Liberty's Traditional Overhead Hardening (WMP-GDOM-GH-05) Target:

In Liberty's 2024 Change Order Request, Liberty requested an increase in its Traditional Overhead Hardening target from 2.0 to 3.5 miles.

- a. Provide Liberty's estimate of the percent change in the 2024 overall system risk resulting from this target increase.

RESPONSE TO REQUEST NO. 2:

- a. Liberty does not currently have sufficient information to calculate the percent change in 2024 overall system risk resulting from this target increase.

REQUEST NO. 3:

Regarding Liberty's Microgrids (WMP-GDOM-GH-07) Target:

In Liberty's 2024 Change Order Request, Liberty requested a decrease in its Microgrids target from 1 to 0.

- a. How many miles of covered conductor does Liberty plan to install in place of this microgrid?
- b. Does Liberty plan to complete these miles of covered conductor installation in 2024?
- c. Are the miles associated with this project in 2024 included in the WMP-GDOM-GH-01 2024 target of 3.9 miles?
- d. If Liberty does not plan to complete these miles of covered conductor installation in 2024, provide the estimated completion date and the number of covered conductor miles per year Liberty expects to complete for each year of the covered conductor installation project.

RESPONSE TO REQUEST NO. 3:

- a. 1.1 miles.
- b. Yes.
- c. Yes.
- d. N/A.

REQUEST NO. 4:

Regarding Liberty's Equipment Settings to Reduce Wildfire Risk (WMP-GDOM-GO-01) Target:

In Liberty's 2024 Change Order Request, Liberty requested the establishment of a target of enabling 15 circuits with sensitive relay profile (SRP) in 2024.

- a. How many circuit miles do these 15 circuits cover?
- b. How did Liberty select the circuits on which to enable SRP? Discuss the circuit selection process, including the extent to which risk models and subject matter expertise were used.
- c. Provide Liberty's estimate of the percent change in the 2024 overall system risk resulting from the establishment of this new target.

RESPONSE TO REQUEST NO. 4:

- a. Approximately 440.5 miles.
- b. In selecting the circuits on which to enable SRP in 2024, Liberty utilized subject matter expertise and its wildfire risk mapping outputs. The first selection criteria included HFTD zone, with circuits in the highest risk HFTDs selected first (*e.g.*, Meyers circuits) followed by circuits that border the highest risk HFTDs (*e.g.*, Glenshire 7400, Stateline 3101). Certain circuits in these areas (*e.g.*, other Stateline circuits) were not included if they are primarily underground circuits. For circuits in the next highest risk HFTD, additional selection criteria included elevation, length of spans, and proximity to ski resorts and population centers.
- c. Liberty does not currently have sufficient information to calculate the percent change in 2024 overall system risk resulting from the establishment of this new target.