



July 1, 2024

Lindsay Maruncic
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Liberty Utilities (CalPeco Electric), LLC
701 National Ave
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SUBJECT: Office of Energy Infrastructure Safety Decision on Liberty Utilities Change Order Request in relation to its 2023-2025 Base Wildfire Mitigation Plan

Ms. Maruncic:

The Office of Energy Infrastructure Safety (Energy Safety) has evaluated Liberty Utilities' (Liberty) change order request pertaining to its 2023-2025 Base Wildfire Mitigation Plan (WMP) pursuant to the 2023-2025 WMP Process and Evaluation Guidelines (Dec. 6, 2022).¹ Energy Safety approves in part and rejects in part Liberty's change order request.

On February 5, 2024, Energy Safety approved² Liberty's 2023-2025 Base WMP.³ Liberty submitted a change order request on May 28, 2024.^{4,5} No stakeholders commented on Liberty's change order request.

¹ [Energy Safety's 2023-2025 Wildfire Mitigation Plan Process and Evaluation Guidelines \(Dec. 2022\) \(hereafter Process Guidelines\)](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53287&shareable=true) (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53287&shareable=true, accessed Jan. 30, 2024).

² [Decision on Liberty Utilities' 2023-2025 Wildfire Mitigation Plan \(Feb. 2024\)](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56276&shareable=true) (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56276&shareable=true, accessed June 14, 2024).

³ Liberty originally submitted its 2023-2025 WMP on May 5, 2023. As required by Energy Safety, Liberty submitted a final version of its 2023-2025 WMP on Feb. 15, 2024, that includes all previously submitted errata: [Liberty 2023 Wildfire Mitigation Plan \(Feb. 15, 2024\)](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56327&shareable=true) (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56327&shareable=true, accessed June 14, 2024).

⁴ [Change Order Request for Liberty's 2023-2025 Wildfire Mitigation Plan \(May 28, 2024\)](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56728&shareable=true) (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56728&shareable=true, accessed June 14, 2024).

⁵ Energy Safety's Decision on Liberty's 2023-2025 Base WMP referred Liberty to the 2023-2025 WMP Process and Evaluation Guidelines (Dec. 2022) for instructions on change orders ([Decision on Liberty Utilities' 2023-2025 Wildfire Mitigation Plan \[Feb. 2024\]](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56276&shareable=true), Section 2 "Introduction and Background," fn. 2, p. 2 & Section 3.6 "Change Order Requests," p. 8 [https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56276&shareable=true, accessed June 19, 2024]). The Process Guidelines required Liberty to submit its change orders within 10 days of Energy Safety's approval of its WMP if the approval is issued after November 1st. Liberty's change order request was untimely. In its discretion, Energy Safety nevertheless reviewed the change order request for its substance.

Below, Energy Safety provides a summary of its determination for each of the requested changes. Energy Safety evaluated the requested changes pursuant to the criteria set forth in Section 12.4 of the 2023-2025 WMP Process and Evaluation Guidelines. In executing its WMP, should an electrical corporation deviate from its approved plan, it will have the opportunity to explain or justify such deviations during the compliance process.

Table 1. Determinations for Liberty Requested Changes

Liberty Initiative ID and Title	Change Requested	Determination	Rationale
Covered Conductor Installation (WMP-GDOM-GH-01)	Liberty proposes to decrease its 2024 target from 5.61 to 3.9 circuit miles.	Rejected	The proposed change does not reduce risk.
Undergrounding of Electric Lines and/or Equipment (WMP-GDOM-GH-02)	Liberty proposes to decrease its 2024 target from 1.25 to 0 circuit miles.	Rejected	<p>The proposed change does not reduce risk.</p> <p>Liberty states the target change request is due to “project delays and permitting issues.”⁶ The reason for the requested change is that the initial target is no longer feasible.</p> <p>This is not an allowable reason to request a change in a target.⁷</p>

⁶ [Change Order Request for Liberty’s 2023-2025 Wildfire Mitigation Plan \(May 28, 2024\)](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56728&shareable=true), PDF p. 5 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56728&shareable=true, accessed June 14, 2024).

⁷ “Energy Safety may reject a change order request for any of the following reasons: Changes to approach or targets exclusively because full implementation may not be feasible”; “Changes to approach or targets exclusively because the electrical corporation expects to exceed or fail to meet its targets” per [Revised WMP Process Guidelines](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56255&shareable=true), Section 12.1 “Criteria for a Change Order Request,” p. 23 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56255&shareable=true, accessed June 14, 2024).

Liberty Initiative ID and Title	Change Requested	Determination	Rationale
Traditional Overhead Hardening (WMP-GDOM-GH-05)	Liberty proposes to increase its 2024 target from 2 to 3.5 circuit miles.	Approved	The proposed change responds to an updated understanding of risk and is likely to reduce wildfire risk.
Microgrids (WMP-GDOM-GH-07)	Liberty proposes to decrease its 2024 target from 1 to 0 microgrids.	Rejected	The proposed change does not reduce risk.
Installation of System Automation Equipment (WMP-GDOM-GH-08)	Liberty proposes to decrease its 2024 target from 8 to 4 automatic reclosers installed.	Rejected	The proposed change does not reduce risk.
Line Removal in HFTD (WMP-GDOM-GH-09)	Liberty proposes to decrease its 2024 target from 1.1 to 0 circuit miles.	Rejected	The proposed change does not reduce risk.

Liberty Initiative ID and Title	Change Requested	Determination	Rationale
Equipment Settings to Reduce Wildfire Risk (WMP-GDOM-GO-01)	Liberty proposes to establish a new 2024 target of 15 circuits enabled with sensitive relay profiles (SRP).	Approved	The proposed change responds to an updated understanding of risk and is likely to reduce wildfire risk.

Summary and Next Steps

Energy Safety approves two of Liberty's seven requests, affecting the following initiatives:

- Traditional Overhead Hardening (WMP-GDOM-GH-05)
- Equipment Settings to Reduce Wildfire Risk (WMP-GDOM-GO-01)

In accordance with the 2023-2025 WMP Process and Evaluation Guidelines, Liberty must include the approved changes to this target in future submissions to Energy Safety, including its 2025 WMP Update submission and future quarterly data reports. Liberty must also resubmit its 2024 Q1 and Q2 quarterly data reports with revisions to reflect these approved changes to the 2024-QDR docket prior to August 1, 2024.

Additionally, Liberty must revise its 2023-2025 Base WMP to reflect the approved two changes for 2024 and submit the revised WMP to the 2023-2025 WMP docket. This revised 2023-2025 Base WMP must represent the WMP approved by Energy Safety on February 5, 2024, with only the two changes noted above. It must not include any other changes not approved by this Change Order Decision.

Sincerely,



Suzie Rose
Program Manager, Electrical Safety Policy Division
Office of Energy Infrastructure Safety