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July 24, 2024

DATA REQUEST RESPONSE

LIBERTY UTILITIES (CALPECO ELECTRIC) LLC

Data Request No.: OEIS-P-WMP_2024-LU-001

Requesting Party: Energy Infrastructure Safety

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Subject: Q01. Regarding Liberty's Substation Defensible Space Target (WMP-VM-VFM-03)

Date Received: July 22, 2024

Due Date: July 25, 2024

Question 1:

Q01. Regarding Liberty's Substation Defensible Space Target (WMP-VM-VFM-03):

In Table 3-2 of its 2025 WMP Update, Liberty provided a "2025 Update Target" of 12 substations for Substation Defensible Space (WMP-VM-VFM-03).¹ In its 2025 Update under Section 3.2.15 "WMP-VM-VFM-03: Substation Defensible Space," Liberty stated that "[t]he 2025 target for substation defensible space did not change. Liberty does not establish targets for its VM substation defensible space WMP initiative."² Liberty's revised 2023-2025 WMP, submitted with the 2025 WMP Update, does not provide a target for this initiative in Table 8-17 "Liberty Vegetation Management Initiative Targets by Year" or in its narrative description of the Substation Defensible Space initiative beyond the statement that there will be a "minimum of two site visits" annually per facility.¹

- a. a. What is Liberty's 2025 target for substation defensible space? Provide both the number and the unit.
- b. b. If the target for 2025 is 12 substations, is Liberty planning to perform site visits at each substation twice a year, amounting to 24 site visits per year?
- c. c. Will the same routine maintenance described in the revised WMP (p. 230) be performed upon each site visit or will the full roster of routine maintenance be performed once, with tasks divided between two site visits?
- d. d. What is the planned frequency of the two site visits per facility (e.g., within a two-week period, six months apart, variable depending on maintenance required, etc.)?
- e. e. What criteria trigger additional site visits beyond the twice-yearly minimum (e.g., site conditions)?

Response to Question 1:

- a. 12 substations.
- b. Liberty intends to perform two site visits per substation to perform vegetation treatments.
- c. Liberty performs the same maintenance described in its WMP during both site visits.
- d. The first treatment is planned to occur between June 1st and September 30th and the second treatment is planned to occur between October 1 and December 31st.
- e. Two treatments are intended to manage vegetation regrowth and debris accumulation effectively during Spring, Summer and Fall months. If vegetation re-growth or debris accumulation occurs inside substation footprints or perimeters between planned treatments and is beyond what Liberty determines to be acceptable levels, Liberty will consider additional treatments to remove vegetation or debris accumulation.

¹ Liberty's 2023-2025 Wildfire Mitigation Plan (Clean, July 2024) (hereafter Liberty's 2023-2025 WMP), p. 206, pp. 230-231 (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56975&shareable=true>, accessed July 11, 2024).