



August 19, 2024

Lindsay Maruncic
President, California
Liberty Utilities (CalPeco Electric), LLC
701 National Ave
Tahoe Vista, CA 96148

Subject: Rejection and Order to Resubmit for Liberty Utilities, LLC, 2025 Wildfire Mitigation Plan Update

Ms. Maruncic:

The Office of Energy Infrastructure Safety (Energy Safety) rejects the Liberty Utilities, LLC, (Liberty) 2025 Wildfire Mitigation Plan Update (2025 WMP Update) submission dated July 8, 2024,¹ and orders Liberty to resubmit its 2025 WMP Update, pursuant to Public Utilities Code section 8386.3(a). Liberty's 2025 WMP Update does not conform to the submission requirements outlined in Energy Safety's 2025 WMP Update Guidelines² and a conforming plan must be submitted before Energy Safety can perform its substantive evaluation.

By September 3, 2024, Liberty must file a 2025 WMP Update submission that conforms to the requirements in Energy Safety's 2025 WMP Update Guidelines.

Opening comments on Liberty's resubmitted 2025 WMP Update are due by September 13, 2024. Energy Safety will consider all comments submitted in response to the Liberty 2025 WMP Update in its evaluation, including comments submitted for the initial July 8, 2024, version. Stakeholders may submit additional comments in response to the resubmitted Liberty 2025 WMP Update. Reply comments are due by September 20, 2024, and must be limited to issues raised and representations made in the opening comments of other stakeholders. Opening and reply comments must be submitted to the 2023-2025 Wildfire Mitigation Plan docket (#2023-2025-WMPs).³ Energy Safety's 2023-2025 WMP Process and

¹ [Liberty 2025 Wildfire Mitigation Plan Update](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56974&shareable=true)

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56974&shareable=true>, accessed July 23, 2024).

² [Energy Safety 2025 Wildfire Mitigation Plan Update Guidelines \(adopted Jan 2024, Published Feb. 2024\)](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56254&shareable=true)

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56254&shareable=true>, accessed July 26, 2024).

³ Submit comments via the Energy Safety e-filing system to the [2023-2025-WMPs docket](https://efiling.energysafety.ca.gov/eFiling/DocketInformation.aspx?docketnumber=2023-2025-WMPs)

(<https://efiling.energysafety.ca.gov/eFiling/DocketInformation.aspx?docketnumber=2023-2025-WMPs>, accessed July 23, 2024).

Evaluation Guidelines provide more information on submitting opening and reply comments.⁴

Sincerely,

A handwritten signature in black ink that reads "Tony Marino". The signature is written in a cursive, slightly slanted style.

Tony Marino
Acting Deputy Director | Electrical Infrastructure Directorate
Office of Energy Infrastructure Safety

Encl: Rejection and Order to Resubmit for Liberty Utilities, LLC, 2025 Wildfire Mitigation
Plan Update

⁴ [Energy Safety 2023-2025 Wildfire Mitigation Plan Process and Evaluation Guidelines \(Revised\) \(adopted Jan. 2024, published Feb. 2024\)](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56255&shareable=true), Section 6, pp. 10-12
(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56255&shareable=true>, accessed July 23, 2024).



OFFICE OF ENERGY INFRASTRUCTURE SAFETY
**REJECTION AND ORDER TO
RESUBMIT**

LIBERTY UTILITIES, LLC
2025 WILDFIRE MITIGATION PLAN UPDATE

August 19, 2024

1. Introduction

The Office of Energy Infrastructure Safety (Energy Safety) rejects the Liberty Utilities, LLC, (Liberty) 2025 Wildfire Mitigation Plan Update (2025 WMP Update) submission dated July 8, 2024.¹

Liberty's 2025 WMP Update does not conform to the submission requirements in Energy Safety's 2025 WMP Update Guidelines.² Consequently, Energy Safety rejects Liberty's 2025 WMP Update.

Liberty must provide a 2025 WMP Update submission that conforms to the requirements in Energy Safety's 2025 WMP Update Guidelines. Section 3 of this document provides instructions and deadlines for Liberty's resubmission.

¹ [Liberty 2025 Wildfire Mitigation Plan Update](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56974&shareable=true)

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56974&shareable=true>, accessed July 23, 2024).

² [Energy Safety 2025 Wildfire Mitigation Plan Update Guidelines \(adopted Jan 2024, Published Feb. 2024\) \(hereafter 2025 WMP Update Guidelines\)](#)

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56254&shareable=true>, accessed July 26, 2024).

2. Non-Conforming Elements

Liberty's 2025 WMP Update does not conform to the submission requirements provided in Energy Safety's 2025 WMP Update Guidelines. The following list outlines the requirements that Liberty's 2025 WMP Update submission did not follow, as well as some specific examples of items Liberty improperly omitted from its 2025 WMP Update. Additionally, the list includes examples of substantive errors in Liberty's 2025 WMP Update submission. This is not a comprehensive list.

1. Liberty omitted the following sections from its 2025 WMP Update: under Section 1.1 Significant Updates: Section 1.1.1. "Top Risk-Contributing Circuit, Segments, or Spans" and Section 1.1.2. "Qualitative Updates."³
 - a. Section 1.1.1 must include the updated table included in Liberty's redlined WMP.
 - b. Section 1.1.2 must describe the various changes to the model indicated in the WMP Update and redlined WMP.
2. Each update to a target, objective, or expenditure must include a justification.⁴
 - a. Liberty updated completion dates for three Emergency Preparedness objectives without providing justifications for these updates (WMP-EP-02, WMP-EP-03, WMP-EP-04).⁵
 - b. Liberty requested a target decrease for WMP-GDOM-GH-02 "Undergrounding of electric lines and/or equipment," without providing justification.⁶
3. An electrical corporation may not add or delete 3- and 10-year objectives from its approved 2023-2025 Base WMP.⁷
 - a. Liberty removed two Emergency Preparedness objectives (WMP-EP-01 and WMP-EP-05) from its 2023-2025 Base WMP.⁸ Liberty stated that the two objectives were erroneously copied into its Base WMP from the Energy Safety

³ [2025 WMP Update Guidelines](#), pp. 7-11

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56254&shareable=true>, accessed July 26, 2024).

⁴ [2025 WMP Update Guidelines](#), p. 13

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56254&shareable=true>, accessed July 26, 2024).

⁵ [Liberty 2025 Wildfire Mitigation Plan Update](#), p. 10

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56974&shareable=true>, accessed July 23, 2024).

⁶ [Liberty 2025 Wildfire Mitigation Plan Update](#), p. 13

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56974&shareable=true>, accessed July 23, 2024).

⁷ [2025 WMP Update Guidelines](#), p. 13

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56254&shareable=true>, accessed July 26, 2024).

⁸ [Liberty 2023-2025 Base WMP \(R4, redacted\) \(redline version, July 8, 2024\)](#), pp. 320-321

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56976&shareable=true>, accessed Aug. 14, 2024).

2023-2025 WMP template;⁹ however, the language of one of the objectives (WMP-EP-01) does not match the template.¹⁰

4. An electrical corporation must report on progress required by the areas for continued improvement identified in Energy Safety's Decision on Liberty's 2023-2025 Base WMP for those areas in which the required progress specified reporting in the 2025 WMP Update.¹¹ In its 2025 WMP Update, Liberty did not provide complete responses for all areas for continued improvement that required reporting in the 2025 WMP Update.
 - a. In LU-23-18 "Weather Station Optimization,"¹² Energy Safety required Liberty to describe how the weather optimization tool was used to assess the density of weather stations in its service territory, provide any locations identified for additional weather stations installations, and include the number of weather stations planned for future installations of weather stations, based on its assessment. In Liberty's response to this area for continued improvement, Liberty did not describe how it used the weather optimization tool to locate four new weather stations, did not provide the locations of these additional weather stations, and did not describe how it used its assessment using the weather optimization tool to decide four weather stations were needed.¹³
 - b. In Liberty's response to LU-23-19 "Weather Station Maintenance, and Calibration,"¹⁴ Liberty did not provide the information required by the area for continued improvement.¹⁵ Liberty stated that it commenced its weather station maintenance and calibration program in January 2024, but that maintenance and calibration logs would not be available until after the project is completed in 2024. However, where any information is available on maintenance dates, calibrations, and timeframes for when the stations were down, Liberty must provide it for the first half of 2024.

⁹ [Liberty 2025 Wildfire Mitigation Plan Update](#), p. 10

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56974&shareable=true>, accessed July 23, 2024).

¹⁰ [Energy Safety 2023-2025 Wildfire Mitigation Plan Technical Guidelines \(December 6, 2022\)](#), p. 137 (examples of emergency preparedness objectives that Liberty stated it inadvertently included from Energy Safety's 2023-2025 WMP template—a Word document sent to the electrical corporations by Energy Safety via email in 2022—are identical to those in the Technical Guidelines)

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53286&shareable=true>, accessed August 7, 2024).

¹¹ [2025 WMP Update Guidelines](#), p. 17

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56254&shareable=true>, accessed April 29, 2024).

¹² [Energy Safety Decision on Liberty Utilities 2023-2025 Base Wildfire Mitigation Plan](#), p. 81

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56276&shareable=true>, accessed July 26, 2024).

¹³ [Liberty 2025 Wildfire Mitigation Plan Update](#), p. 39

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56974&shareable=true>, accessed July 23, 2024).

¹⁴ [Energy Safety Decision on Liberty Utilities 2023-2025 Base Wildfire Mitigation Plan](#), pp. 81-82

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56276&shareable=true>, accessed July 26, 2024).

¹⁵ [Liberty 2025 Wildfire Mitigation Plan Update](#), pp. 39-40

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56974&shareable=true>, accessed July 23, 2024).

- c. In Liberty’s response to LU-23-20 “Early Detection of Ignitions with HD Cameras,”¹⁶ Liberty did not provide the required outline of the development and implementation of policy and procedures for HD cameras in its service territory.¹⁷
5. The electrical corporation must describe its proposed updates in its 2025 WMP Update.¹⁸ Changes in the revised 2023-2025 Base WMP (redlined and clean) without an explanation in the WMP Update are not allowed. Updates that do not meet reportable update criteria are not allowed.¹⁹ Liberty included the following unexplained updates in its revised 2023-2025 Base WMP:
 - a. A planned addition to weather forecasting and modeling to support Public Safety Power Shutoff condition monitoring.²⁰
6. The electrical corporation must submit a redlined version of its 2023-2025 Base WMP showing proposed updates to the approved 2023-2025 Base WMP.²¹ Liberty’s redlined WMP is missing:
 - a. Target and objective updates for all grid design and system hardening initiatives that Liberty described in its 2025 WMP Update.
 - b. Updates to the microgrids objective that Liberty described in its 2025 WMP Update.
 - c. The new component of its Vegetation Management QA/QC program that Liberty described in its 2025 WMP Update.
 - d. Changes to Section 8.1.7 “Open Work Orders” to reflect Liberty’s response to LU-23-08 “Halting Detailed Distribution Inspections.”
 - e. Additionally, Liberty must include the following in its Revised Base WMP (redlined and clean):

¹⁶ [Energy Safety Decision on Liberty Utilities 2023-2025 Base Wildfire Mitigation Plan](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56276&shareable=true), p. 82 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56276&shareable=true, accessed July 26, 2024).

¹⁷ [Liberty 2025 Wildfire Mitigation Plan Update](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56974&shareable=true), pp. 40-41 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56974&shareable=true, accessed July 23, 2024).

¹⁸ [2025 WMP Update Guidelines](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56254&shareable=true), p. 3 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56254&shareable=true, accessed July 26, 2024).

¹⁹ [2025 WMP Update Guidelines](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56254&shareable=true), p. 3 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56254&shareable=true, accessed April 29, 2024).

²⁰ Liberty 2023-2025 Base WMP (R4, redacted) (redline version, July 8, 2024), p. 420 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56976&shareable=true, accessed Aug. 14, 2024).

²¹ [2025 WMP Update Guidelines](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56254&shareable=true), p. 4 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56254&shareable=true, accessed April 29, 2024).

- i. The original table “Liberty Top-Risk Circuits” from its approved Base WMP, showing Liberty’s top 5 percent risk circuits.²² This table must be included unchanged from Liberty’s approved Base WMP.²³
 - ii. The updated Table 6.5 showing the top 5 percent risk circuit tables titled Table 6-5.B “Summary of Top-Risk Circuits, Segments, or Spans – Updated” showing the updated segment ranking that Liberty should have provided in its 2025 WMP Update under Section 1.1.1 “Top Risk-Contributing Circuit, Segments, or Spans” in Table 1-1 “Top 5% Ignition Risk Circuits/Segments/Spans” and Table 1-2 “Top 5% PSPS Risk Circuits/Segments/Spans.”²⁴ In the redlined version, Table 6-5.B must be shown as a tracked addition.
7. Liberty did not provide sufficient justification for its request for a 566 percent increase in projected expenditures for WMP-GDOM-AI-01 “Detailed inspections of distribution electric lines and equipment.”²⁵
8. Liberty included a non-reportable target update for WMP-GDOM-AI-01 “Detailed inspections of distribution electric lines and equipment” (260.9 miles to 260.4 miles, a change of less than 10 percent).²⁶
9. Liberty did not provide sufficient justification for updates to WMP-GDOM-AI-04 “Other discretionary inspections of distribution electric lines and equipment.” Liberty did not include details on what these inspections entail.²⁷
10. Liberty did not provide sufficient justification for five updates to grid design, operations, and maintenance projected initiative expenditures: justifications are identical (or nearly identical) and insufficient for requested updates to projected expenditures for WMP-GDOM-GH-12a “Tree attachment removal,” WMP-GDOM-GH-12b “Open wire/grey wire,” WMP-GDOM-AI-05 “Quality assurance / quality control of inspections,” and WMP-GDOM-AI-06 “Substation inspections.”²⁸

²² [Liberty 2023-2025 Base WMP \(R4, redacted\) \(redline version, July 8, 2024\)](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56976&shareable=true), pp. 16-18 (the original Table 6-5 was deleted here) (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56976&shareable=true, accessed Aug. 14, 2024).

²³ [Liberty 2023-2025 Wildfire Mitigation Plan \(Feb. 2024\)](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56327&shareable=true), p. 96 (numbered here as Table 6-7, corrected to Table 6-5 in the revised WMP) (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56327&shareable=true, accessed Aug. 7, 2024).

²⁴ [2025 WMP Update Guidelines](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56254&shareable=true), pp. 9-10 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56254&shareable=true, accessed April 29, 2024).

²⁵ [Liberty 2025 Wildfire Mitigation Plan Update](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56974&shareable=true), p. 15 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56974&shareable=true, accessed July 23, 2024).

²⁶ [2025 WMP Update Guidelines](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56254&shareable=true), p. 13 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56254&shareable=true, accessed April 29, 2024).

²⁷ [Liberty 2025 Wildfire Mitigation Plan Update](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56974&shareable=true), p. 17 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56974&shareable=true, accessed July 23, 2024).

²⁸ [Liberty 2025 Wildfire Mitigation Plan Update](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56974&shareable=true), pp. 14-18 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56974&shareable=true, accessed July 23, 2024).

11. Liberty did not provide sufficient justification for six updates to vegetation management projected initiative expenditures: justifications are identical and insufficient for requested updates to projected expenditures for WMP-VM-INSP-02 “VM Inspection Program – Patrol,” WMP-VM-VFM-03 “Substation Defensible Space,” WMP-VM-VFM-04 “Fire-Resilient-Right-of-Ways,” WMP-VM-VFM-05 “Clearance,” WMP-VM-VFM-06 “Fall-in Mitigation,” and WMP-VM-ESG-01 “VM Enterprise Management System.”²⁹
12. Liberty's justification for its WMP-VM-VFM-03 “Substation Defensible Space” target in Section 3.2.15.1 conflicts with information provided in response to an Energy Safety data request.³⁰ Liberty must clarify in its WMP Update that it has a 2025 target for WMP-VM-VFM-03 “Substation Defensible Space.” This includes adding this target to Tables 8-17 and 8-18 of Liberty's revised 2023-2025 Base WMP with the appropriate unit (e.g., number of inspections).
13. Liberty included in its WMP Update the required overview of the vendor risk modeling software along with implementation milestones and dates but did not indicate where in Liberty's revised 2023-2025 Base WMP this information is located, only stating “Liberty provides additional information [...] throughout Section 6 of its updated 2023-2025 WMP.”³¹
14. Liberty included in its WMP Update response to area for continued improvement LU-23-05 “Cross-Utility Collaboration on Best Practices for Inclusion of Climate Change Forecasts in Consequence Modeling, Inclusion of Community Vulnerability in Consequence Modeling, and Utility Vegetation Management for Wildfire Safety”³² mention of cross-utility collaboration but did not provide details. In its resubmission, Liberty must explain any cross-utility collaboration it engaged in since filing its Base 2023-2025 WMP, including both its participation in Energy Safety-sponsored activities and any collaboration with the other utilities outside of Energy Safety-sponsored activities.

²⁹ [Liberty 2025 Wildfire Mitigation Plan Update](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56974&shareable=true), pp. 18-20

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56974&shareable=true>, accessed July 23, 2024).

³⁰ Data Request [OEIS-P-WMP-2024-LU-001](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57080&shareable=true), Question 1

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57080&shareable=true>, accessed July 30, 2024).

³¹ [Liberty 2025 Wildfire Mitigation Plan Update](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56974&shareable=true), p. 26

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56974&shareable=true>, accessed July 23, 2024).

³² [Liberty 2025 Wildfire Mitigation Plan Update](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56974&shareable=true), pp. 27-28

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56974&shareable=true>, accessed July 23, 2024).

3. Conclusion and Next Steps

Liberty must submit a 2025 WMP Update to Energy Safety's 2023-2025 WMP docket that conforms to Energy Safety's 2025 WMP Update Guidelines, pursuant to the schedule below. Liberty's resubmitted 2025 WMP Update will be the subsequent version of its 2025 WMP Update submission and must be named accordingly, e.g., Liberty 2025 WMP Update R1.

Opening and reply comments on Liberty's resubmitted 2025 WMP Update must be provided in accordance with Energy Safety's 2023-2025 WMP Process and Evaluation Guidelines. For Liberty only (not for other Group 2 electrical corporations), the schedule below supersedes the schedule published by Energy Safety on January 26, 2024.³³

The schedule for this Rejection and Order to Resubmit is as follows:

| | |
|---|--------------------|
| Liberty's resubmitted 2025 WMP Update due: | September 3, 2024 |
| Opening comments due on Liberty 2025 WMP Update: | September 13, 2024 |
| Reply comments due on Liberty 2025 WMP Update: | September 20, 2024 |
| Draft Decision on Liberty 2025 WMP Update issued no later than: | November 30, 2024 |

Liberty's submission of a 2025 WMP Update that conforms with the submission instructions in Energy Safety's 2025 WMP Update Guidelines does not guarantee the approval of Liberty's 2025 WMP Update.

³³ [2025 WMP Update Schedule \(January 26, 2024\)](#)

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56209&shareable=true>, accessed July 24, 2024).

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