

Liberty Utilities (CalPeco Electric) LLC 933 Eloise Avenue South Lake Tahoe, CA 96150 Tel: 800-782-2506

Fax: 530-544-4811

September 3, 2024

VIA OEIS E-FILING

Office of Energy Infrastructure Safety 715 P Street, 20th Floor Sacramento, CA 95814 efiling@energysafety.ca.gov

Pursuant to The Office of Energy Infrastructure Safety's August 19 Rejection and Order to Resubmit for Liberty Utilities 2025 Wildfire Mitigation Plan Update (Order to Resubmit) and Revised 2023-2025 Wildfire Mitigation Plan Process and Evaluation Guidelines (2025 WMP Update Guidelines), Liberty Utilities (CalPeco Electric) LLC ("Liberty") hereby provides to The Office of Energy Infrastructure Safety ("Energy Safety") its 2025 Update to Liberty's 2023-2025 Wildfire Mitigation Plan ("WMP"). Consistent with Energy Safety's Order to Resubmit and 2025 WMP Update Guidelines, the following documents are included with Liberty's 2025 WMP Update submission:

- 1) Liberty 2025 WMP Update_R1_Redlined
- 2) Liberty 2025 WMP Update_R1_Clean
- 3) Updated Liberty 2023-2025 Base WMP R6 Redlined (redacted version)
- 4) Updated Liberty 2023-2025 Base WMP R6 Clean (redacted version)
- 5) Updated Liberty 2023-2025 Base WMP R6 Redlined (confidential version)
- 6) Updated Liberty 2023-2025 Base WMP R6 Clean (confidential version)

Liberty has made the following changes to its 2025 WMP Update to address the non-conforming items identified in the Energy Safety Order to Resubmit:

- 1. Item 1: Updated Section 1.1.1 of Liberty's 2025 WMP Update to include Table 1-1: Liberty Top-Risk Circuits (from 2025 WMP Update submission). Added Section 1.1.2 of Liberty's 2025 WMP Update, including Table 1-3: Summary of Significant Updates to Liberty's Wildfire Risk Models.
- 2. Item 2: Updated Table 2-1 to clarify that the update to completion dates for Emergency Preparedness objectives for WMP-EP-02, WMP-EP-03, WMP-EP-04 to annual (including both June 2024 and June 2025) and included it as an ongoing objective in its 10-year plan. Liberty intends for this to be an annual ongoing objective. Updated Section 2.2.1.3 to include justification for its target decrease for WMP-GDOM-GH-02.
- 3. Item 3: Updated Table 2-1 to remove WMP-EP-01 and WMP-EP-05.
- 4. Item 4: Updated Sections 5.18, 5.19, and 5.20 to include additional information for LU-23-18, LU-23-19, and LU-23-20.

- 5. Item 5: Updated Section 2.1 to include information on a planned addition to weather forecasting and modeling to support Public Safety Power Shutoff condition monitoring.
- 6. Item 7: Updated Section 2.2.7 to include additional information for WMP-GDOM-AI-01.
- 7. Item 8: Updated Section 2.2.7 to fix an error with the 2025 target for WMP-GDOM-AI-01.
- 8. Item 9: Updated Section 2.2.10 to include additional information for WMP-GDOM-AI-04.
- 9. Item 10: Updated Sections 2.2.3.3, 2.2.5.3, 2.2.11, and 2.2.12.3 to include additional information for WMP-GDOM-GH12a, WMP-GDOM-GH12e, WMP-GDOM-AI-05, and WMP-GDOM-AI-06.
- 10. Item 11:Updated Sections 2.2.14.3, 2.2.15.3, 2.2.16.3, 2.2.17.3, 2.2.18.3, 2.2.19.3 to include additional information for WMP-VM-INSP-02, WMP-VM-VFM-03, WMP-VM-VFM-04, WMP-VM-VFM-05, WMP-VM-VFM-06, and WMP-VM-ESG-01.
- 11. Item 12: Updated Section 2.2.15.1 to include Liberty's 2025 target for WMP-VM-VFM-03.
- 12. Item 13: Updated Section 5.4 to include additional information for its response to LU-23-04.
- 13. Item 14: Updated Section 5.5. to include additional information for its response to LU-23-05.

Liberty has made the following changes to its Updated 2023-2025 WMP to address the non-conforming items identified in the Energy Safety Order to Resubmit:

- 1. Item 3: Updated Table 8-42 to include WMP-EP-01. Updated Table 8-43 to include WMP-EP-05.
- 2. Item 6: Updated Sections 8.1.2, 8.2.5, 8.1.7, and 6.4.2 to include proposed updates.
- 3. Item 8: Updated Table 8-4 to fix an error with the 2025 target for WMP-GDOM-AI-01.
- 4. Item 9: Updated Section 8.1.3.4 to include additional information for WMP-GDOM-AI-04
- 5. Item 12: Updated Table 8-17 to include Liberty's 2025 target for WMP-VM-VFM-03.

The public versions of the updated documents will also be posted to Liberty's webpage at the following link: https://libertyutilities.com/ca/wmp/

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

Jordan Parrillo
Manager of Regulatory Affairs
Liberty Utilities (CalPeco Electric) LLC
701 National Ave,
Tahoe Vista, CA 96148
Telephone: 530-721-7818
jordan.parrillo@libertyutilities.com