

**BEFORE THE OFFICE OF ENERGY INFRASTRUCTURE SAFETY
DOCKET 2022-SVM**

**LIBERTY UTILITIES (CALPECO ELECTRIC) LLC (U 933-E) 2022 SUBSTANTIAL
VEGETATION MANAGEMENT AUDIT CORRECTIVE ACTION PLAN RESPONSE**

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Pursuant to the Office of Energy Infrastructure Safety’s (“OEIS”) Audit of Liberty’s Substantial Vegetation Management (“SVM”) work in 2022, Liberty Utilities (CalPeco Electric) LLC (“Liberty”) submits this 2022 SVM Audit Corrective Action Plan Response addressing findings related to three of its twenty-one vegetation management initiatives (7.3.5.2 Detailed Inspections and Management Practices for Vegetation Clearances Around Distribution Electrical Lines and Equipment, 7.3.5.15 Identification and Remediation of “at-risk species,” and 7.3.5.18 Substation Vegetation Management).

I. LIBERTY RESPONSE AND CORRECTIVE ACTIONS FOR LIBERTY WILDFIRE MITIGATION PLAN INITIATIVE 7.3.5.2

In its audit of Liberty’s 2022 SVM work, OEIS included the following Finding and Corrective Actions related to Liberty’s Wildfire Mitigation Plan (“WMP”) Initiative 7.3.5.2: Detailed Inspections and Management Practices or Vegetation Clearances around Distribution Electrical Lines and Equipment:

Finding	Corrective Action
1. Liberty did not provide information consistent with the completion of its detailed inspection target of 221 circuit miles. (Statement #9)	Liberty must supply a corrective action response addressing the finding identified in statement 9.

Liberty complied with this initiative. The stated purpose of this initiative is to identify and prescribe tree work for at-risk species and hazard trees through comprehensive, detailed inspections. These inspections are also used to assess the effectiveness of other protocols in place to maintain adequate vegetation clearances and to locate and remove obvious hazards within the utility strike zone.

As described in Section 7.3.5.2 of Liberty’s 2022 WMP Update, Liberty employs a “defense-in-depth” strategy to mitigate vegetation threats and maintain clearances to reduce wildfire risk. The combination of both detailed and patrol inspections with maintenance activities forms a multifaceted approach to managing vegetation risk. In 2022, Liberty determined the need to increase its patrol inspections to address tree mortality on the system. Resources were diverted from completing targeted detailed inspection work to complete additional patrol inspections under Initiative 7.3.5.11, patrol inspections of vegetation around distribution electric lines and equipment, in excess of Liberty’s target. As indicated in Liberty’s non-spatial, Quarter 4 (“Q4”) Quarterly Data Report (“QDR”) from 2022, Liberty targeted 171 miles of patrol inspections in its 2022 WMP Update and completed 235 miles of patrol inspections. Liberty contends that the intent of this initiative was met because a large percentage of its detailed inspection target (95%) was completed, and because diversion of resources that would have been used to complete its detailed inspection target of 221 circuit miles was necessary to address the risk of tree mortality to the system in 2022.

II. LIBERTY RESPONSE AND CORRECTIVE ACTIONS FOR LIBERTY WMP INITIATIVE 7.3.5.15

In its audit of Liberty’s 2022 SVM work, OEIS included the following Findings and Corrective Actions related to Liberty WMP Initiative 7.3.5.15: Identification and Remediation of At-Risk Species:

Finding	Corrective Action
2. Liberty did not provide information consistent with the completion of its target to treat “at-risk species” along 238 circuit miles of its system in 2022. (Statement #31)	Liberty must supply a corrective action response addressing the finding identified in statement 31.

Liberty complied with this initiative. The stated purpose of this initiative is to identify, document, and mitigate trees that are located within the Utility Strike Zone and are expected to pose a risk to electric facilities based on the tree’s observed structural condition and site considerations. Initiative 7.3.5.15

focuses on the identification of hazard trees, and as indicated in Liberty’s 2022 WMP Update, the work under this initiative is closely tied to Initiative 7.3.5.16 – removal and remediation of trees with strike potential to electric lines and equipment. During planning of 2022 vegetation management work, Liberty determined the need to increase the removal and remediation of trees with strike potential to electric lines and equipment to address tree mortality on the system. Resources were diverted from completing targeted work under Initiative 7.3.5.15 to complete additional removal of trees with strike potential in excess of Liberty’s target for Initiative 7.3.5.16. As indicated in Liberty’s non-spatial, Q4 QDR from 2022, Liberty targeted the treatment of 171 miles, and completed 203 miles of removal and remediation of trees with strike potential to electric lines and equipment. Liberty contends that the intent of this initiative was met because a large percentage of its target under Initiative 7.3.5.15 (94%) was completed, and because diversion of resources that would have been used to complete its target of 238 miles was necessary to address the risk of tree mortality to the system in 2022.

III. LIBERTY RESPONSE AND CORRECTIVE ACTIONS FOR LIBERTY WMP INITIATIVE 7.3.5.18

In its audit of Liberty’s 2022 SVM work, OEIS included the following Findings and Corrective Actions related to Liberty WMP Initiative 7.3.5.18: Substation Vegetation Management:

Finding	Corrective Action
3. Liberty did not provide information consistent with the completion of treatment / vegetation management work at its 12 substations in 2022. (Statement #34)	Liberty must supply a corrective action response addressing the finding identified in statement 34.

Liberty’s Substation Vegetation Management initiative and Scope of Work and Specifications for Substation Vegetation Management (“Scope of Work”) were established in the fall of 2022, and no quantitative target was set for this initiative in 2022. As OEIS indicated in its audit of Liberty’s 2022 SVM work, Liberty was able to complete two of its 12 substation treatments in the fall of 2022 and deferred

work on the remaining substations to the following year due to weather conditions, as snowfall negated the need for further substation treatments that year. As indicated in Liberty's non-spatial, Q4 QDR from 2023, Liberty exceeded its 2023 target of 12 substation treatments for this initiative, completing 22 substation treatments. To address the corrective action requirement for this initiative, Liberty has updated its Scope of Work to reflect that adaptive substation vegetation management includes adjusting control methods, timing, or frequency of site visits due to weather, access, or other environmental constraints.

IV. CONCLUSION

Liberty appreciates this opportunity to provide its 2022 SVM Audit Response and looks forward to continuing to work with OEIS to help reduce the risk of wildfires.

Respectfully submitted,

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