

**BEFORE THE OFFICE OF ENERGY INFRASTRUCTURE SAFETY
OF THE STATE OF CALIFORNIA**

Office of Energy Infrastructure Safety
Natural Resources Agency

**COMMENTS OF THE GREEN POWER INSTITUTE
ON THE DRAFT DECISION ON LIBERTY UTILITIES
2025 WILDFIRE MITIGATION PLAN UPDATE**

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Gregory Morris, Director
Zoe Harrold, Scientist
The Green Power Institute
a program of the Pacific Institute
2039 Shattuck Ave., Suite 402
Berkeley, CA 94704
ph: (510) 644-2700
fax: (510) 644-1117
gmorris@emf.net

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The Green Power Institute (GPI), the renewable energy program of the Pacific Institute for Studies in Development, Environment, and Security, provides these *Comments of the Green Power Institute on the Draft Decision on Liberty Utilities 2025 Wildfire Mitigation Plan Update*.

GPI reviewed the Draft Decision on Liberty Utilities 2025 Wildfire Mitigation Plan Update (WMP), issued on January 27, 2025. We provide comments on the following topics roughly in order of Draft Decision contents:

- Section 6.2.2.1 minor revision.
- In Appendix D, reference GPI’s contribution to the expectation for Liberty to provide information on its resonant grounding pilot.
- Record the expectation for Liberty to provide information on its resonant grounding pilot in the 2026-2028 WMP, and track its response, via an ACI.
- Update LU-23B-12 to require Liberty to justify pilot project scope of work.
- Academia-driven HD camera implementation timelines may not align with the applied context of the WMPs.

Comments

Section 6.2.2.1 minor revision.

Recommended minor revisions for Section 6.1.2.2 LU-23B-02: PSPS and Wildfire Risk Trade-Off, Energy Safety Evaluation are (underline in additions, deletions in strikethrough):

Given Liberty’s historically low amount of PSPS risk, Liberty adequately justified its prioritization of modeling asset risk before modeling PSPS risk. However, ~~that does it mean that~~ Liberty does ~~not~~ have ~~any~~ PSPS risk, as Liberty had multiple PSPS events in November 2024.¹

¹ Draft Decision on Liberty Utilities 2025 WMP Update, p. 13-14

In Appendix D, reference GPI’s contribution to the expectation for Liberty to provide information on its resonant grounding pilot.

GPI Comments on Liberty’s 2025 WMP Update recommended:

Require Liberty to provide an update on its resonant grounding pilot, including a summary of its assessment of future cost and needs as well as a justification for future proofing its substations to support a “Swedish neutral” without implementing a pilot to verify cost-benefit.²

This recommendation directly aligns with the Draft Decision statement that:

Energy Safety expects Liberty to provide updates regarding this technology, such as the outcomes of the cost and resource assessments and how it is considering resonant grounding during substation design, in its 2026-2028 Base WMP.³

GPI respectfully requests that we be recognized for this contribution in the Draft Decision Appendix D. Stakeholder Comments on the 2025 WMP Updates.

Record the expectation for Liberty to provide information on its resonant grounding pilot in the 2026-2028 WMP, and track its response, via an ACI.

The Draft Decision establishes that (emphasis added):

Liberty’s objective change for its resonant grounding pilot (WMP-GDOM-GH-06) changes the completion date from December 31, 2025, to TBD. Liberty stated it changed this completion date to assess future cost and resource needs. Though Liberty’s approved 2023-2025 Base WMP did not have targets associated with this objective, *Energy Safety expects Liberty to provide updates regarding this technology, such as the outcomes of the cost and resource assessments and how it is considering resonant grounding during substation design, in its 2026-2028 Base WMP.*⁴

GPI supports this call to continued action and reporting in the 2026-2028 WMP. We are concerned that the expectation may inadvertently get overlooked in the 2026-2028 WMP preparation and review process, which is anticipated to entail a very heavy workload through 2025, in addition to other wildfire and WMP related activities (e.g. RMWG). Memorializing this specific call to action and reporting in an ACI would ensure that Liberty addresses it in the 2026-

² GPI Comments on Group 2 2025 WMP Updates, p. 33-34

³ Draft Decision on Liberty Utilities 2025 WMP Update, p. 27

⁴ Ibid.

2028 WMP and that OEIS and stakeholders track and review progress over time. Areas of Continued Improvement identify expectations for specific improvements to utility WMPs and track the progress of a utility towards fulfilling the expectation. Accordingly, GPI recommends tracking Liberty’s progress “to provide updates regarding [resonant grounding], such as the outcomes of the cost and resource assessments and how it is considering resonant grounding during substation design, in its 2026-2028 Base WMP” via a new ACI.

Update LU-23B-12 to require Liberty to justify pilot project scope of work.

LU-23B-12 addresses Additional Inspection Practices. The Energy Safety Evaluation finds deficits in Liberty’s response, including a lack of timelines and milestones, as well as issues with the scope of the pilot project and expected find rates.⁵ The Draft Decision issues ACI LU-25U-06 to update expectations and track continued progress in this area.⁶ GPI generally supports this ACI. We recommend updating LU-25U-06 to also require that Liberty justify (and revise as needed) the pilot projects scope of work, including how the work scopes are right sized to ensure timely and usable outputs that inform downstream program-level implementation and decision making.

Academia-driven HD camera implementation timelines may not align with the applied context of the WMPs.

The Draft Decision finds that

...Liberty has continually reported, since its 2021 WMP Update, that it would partner/adopt HD wildfire cameras each year for early detection of wildfires....In its 2025 WMP Update, Liberty provided information related to the ongoing delays due to its working agreement with University of Nevada Reno (UNR) to fund the maintenance of existing HD cameras through the Alert Wildfire program. While Liberty stated that there was an initial delay in executing this agreement due to UNR exploring privatization of the Alert Wildfire program, UNR ultimately did not proceed with privatization. UNR provided Liberty with a view shed analysis for proposed locations of existing cameras for Liberty to adopt into its system, as well as locations where current coverage is lacking for future HD camera consideration. Given the initial delay, Liberty is currently waiting for an updated proposal from UNR that will outline the future development of

⁵ Ibid, p. 33

⁶ Ibid, p. 62

policy and procedures for the HD cameras. In its 2025 WMP Update, Liberty provided an outline of initial policies and procedures that Liberty is in the process of developing for the Alert Wildfire program.... Liberty has sufficiently responded to this area for continued improvement.⁷

GPI is concerned that this delay may be linked in part to a difference between academia-driven timelines versus wildfire mitigation application and compliance driven timelines. Academia is not beholden to Energy Safety expectations or utility wildfire mitigation requirements and liability. Consequently, academia-driven deadlines are not necessarily established, or conformed to, in alignment with utility wildfire mitigation application requirements and expected risk reduction timelines. And, while the prior delays were explained, the issue is not resolved. Liberty is still waiting for an updated proposal that will solidify if and when UNR HD cameras, and associated policy and procedures, are in place to result in a utility application that supports wildfire risk reduction. The timeline appears to hinge on an academic-driven timeline, such that it is not clear when UNR Principal Investigators, independent of OEIS oversight, will provide an updated proposal and whether their internal timeline considers Liberty's wildfire risk reduction requirements. Given years of delay, which is not resolved and is ongoing, GPI recommends keeping ACI LU-23B-20: Early Detection of Ignitions with HD Cameras open for the purpose of tracking progress on this proposed mitigation through the 2026-2028 WMP cycle. Keeping ACI open for the purpose of continued reporting on unresolved issues is a standard practice and should be applied in the case of LU-23B-20.

⁷ Ibid, pp. 51-52

Conclusions

We urge the OEIS to adopt our recommendations herein.

Dated February 18, 2025.

Respectfully Submitted,

A handwritten signature in blue ink that reads "Gregory Morris". The signature is written in a cursive style and is positioned above a solid horizontal line.

Gregory Morris, Director
The Green Power Institute
a program of the Pacific Institute
2039 Shattuck Ave., Suite 402
Berkeley, CA 94704
ph: (510) 644-2700
e-mail: gmorris@emf.net