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April 22, 2025

***VIA OEIS E-FILING***

***OEIS Docket No. 2023-2025-WMPs***

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Pursuant to the Office of Energy Infrastructure Safety's ("Energy Safety") 2023-2025 Wildfire Mitigation Plan ("WMP") Process and Evaluation Guidelines and the Energy Safety Final Decision on Liberty's 2025 WMP Update, Liberty Utilities (CalPeco Electric) LLC ("Liberty") respectfully submits this Change Order Request for its 2025 WMP Update. The submission consists of the following:

- Summaries of the proposed change for 2025;
- Explanations of the proposed change for 2025; and
- Proposed quarterly targets for one 2025 WMP initiative.

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

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# **Liberty Utilities (CalPeco Electric) LLC 2025 WMP Update Change Order Request**

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## 1. Change Order

The Office of Energy Infrastructure Safety (“Energy Safety”) issued a final decision approving Liberty’s 2025 Wildfire Mitigation Plan (“WMP”) Update on April 8, 2025. Energy Safety’s 2023-2025 WMP Process and Evaluation Guidelines (“Energy Safety Guidelines”) allow utilities to seek changes to approved mitigation initiatives as they gain experience and assess outcomes.<sup>1</sup> The Energy Safety Guidelines state that a utility must request a change order as soon as practicable after the WMP is approved and the utility determines a change is warranted.<sup>2</sup> The change order process allows utilities to assess and update the most effective and efficient approach to mitigating its wildfire risk and acknowledges that approaches described in WMPs could change as utilities gain experience and assess outcomes.

The Energy Safety Final Decision on Liberty’s 2025 WMP Update states that Liberty must submit a change order request within 10 business days of Energy Safety’s issuance of its final decision.<sup>3</sup> One of the criteria specified in the Energy Safety Guidelines that would necessitate a change order is if the change represents a significant shift in either the strategic direction or purpose of an initiative.<sup>4</sup> The Energy Safety Guidelines also allow utilities to update quarterly initiative targets for initiatives to assist in adjusting to the year-ahead approach.<sup>5</sup>

Pursuant to the change order process, Liberty requests approval of an updated 2025 target for one WMP initiative that Liberty considers a significant change per the Energy Safety Guidelines.

Liberty is also providing updated quarterly initiative targets for 2025 for the same initiative.

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<sup>1</sup> Office of Energy Infrastructure Safety 2023-2025 Wildfire Mitigation Plan Process and Evaluation Guidelines, Revised, January 2024, page 22.

<sup>2</sup> Office of Energy Infrastructure Safety 2023-2025 Wildfire Mitigation Plan Process and Evaluation Guidelines, Revised, January 2024, page 23.

<sup>3</sup> Office of Energy Infrastructure Safety Decision on Liberty 2025 Wildfire Mitigation Plan Update, April 2025.

<sup>4</sup> Office of Energy Infrastructure Safety 2023-2025 Wildfire Mitigation Plan Process and Evaluation Guidelines, Revised, January 2024, page 23.

<sup>5</sup> Office of Energy Infrastructure Safety 2023-2025 Wildfire Mitigation Plan Process and Evaluation Guidelines, Revised, January 2024, page 24.



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## 1.1 Change Order Request for 2025 WMP Initiatives

Liberty requests to update one of its WMP initiative targets for 2025:

2025 WMP Initiative Target Update Requested	2025 Original Target	2025 Updated Target
Detailed Inspections of Distribution Electric Lines and Equipment	260.4 miles	183.9 miles

### 1.1.1 Detailed Inspections of Distribution Electric Lines and Equipment (WMP-GDOM-AI-01)

The proposed 2025 target change for Detailed Inspections of Distribution Electric Lines and Equipment is a reduction from 260.4 circuit miles to 183.8 circuit miles. This target reduction is the result of Liberty's optimization of its detailed asset inspection schedule.

Liberty's past inspection schedule was based on a five-year cycle, and its detailed asset inspection targets, including the original 2025 target of 260.4 miles, were based on inspecting 20% of the circuit miles in its system each year.

Through experience and assessment of its practices, Liberty has revised its inspection scheduling process to account for two factors unique to Liberty:

- 1) Liberty's assets are not distributed evenly across its service territory. Some areas of its system have a much higher density of electric assets than others.
- 2) Liberty's past inspection process scheduled inspection of distribution and transmission assets at different times and did not account for the geographic proximity of the distribution assets and the transmission assets.

Liberty's inspection schedule is still based on a five-year cycle; however, the target calculation for inspections is now based on the number of electric assets rather than circuit miles. Liberty is also simultaneously inspecting distribution and transmission assets that are in the same corridor of its system. Both of these changes will optimize inspection efforts and improve the efficiency of the completed inspections year over year.



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### Liberty's Proposed Target Change Will Not Negatively Impact Risk Reduction

The following table summarizes Liberty's original annual targets for Detailed Inspections of Distribution Electric Lines and Equipment found in its 2023-2025 WMP:

	2023 Target	2024 Target	2025 Target (original)	Total: 2023- 2025 WMP Cycle
Detailed Inspections of Distribution Electric Lines and Equipment	156.4 miles	264.2 miles	260.4 miles	681 miles

Liberty exceeded its targets for this initiative in 2023 and 2024, and the proposed updated target would not have a negative impact on overall risk reduction in the 2023-2025 WMP cycle. As the following table shows, Liberty will still be on track to exceed its targeted total for this initiative in the 2023-2025 WMP cycle:

	2023 Actual	2024 Actual	2025 Target (proposed)	Total: 2023-2025 WMP Cycle
Detailed Inspections of Distribution Electric Lines and Equipment	181.4 miles	363.5 miles	183.9 miles	728.8 miles

## 1.2 2025 WMP Initiative Quarterly Targets

In alignment with the proposed target change in Section 1.1 above, Liberty requests to establish quarterly targets for one WMP initiative for 2025:

2025 WMP Initiative Quarterly Target Requested	Quarter 2 2025 Target	Quarter 3 2025 Target
Detailed Inspections of Distribution Electric Lines and Equipment	45 miles	150 miles