



Fire Prevention Plan for Overhead Electric Facilities

REVISION HISTORY

The Liberty Utilities (CalPeco Electric), LLC (U 933-E) (Liberty CalPeco) Wildfire Prevention Department (Department) updated the Fire Prevention Plan (FPP or Plan) October 2019.¹ The Department will oversee the execution of required training for Liberty CalPeco personnel and contractors prior to the 2020 fire season.

PURPOSE

In 2017 and 2018, California experienced some of the most destructive wildfires in its history. The combination of drought, extreme winds and build-up of dry vegetation contributed to increased wildland fires. The wildfire season and associated forest fire risk factors have increased due to warmer spring and summer temperatures, reduced snowpack, and earlier spring snowmelt, leading to higher levels of dry fuels. Liberty CalPeco recognizes that the operations, maintenance and construction on the electric grid, and characteristics of associated equipment may present an ignition risk. Our goal is to develop reasonable and actionable plans to mitigate ignition risks, be prepared to suppress small fires, keep our employees safe while working in wildland areas and provide general fire safety precautions for field operations.

Liberty CalPeco developed this Plan in compliance with Ordering Paragraph 3 of California Public Utilities Commission (CPUC) Decision (D.) 12-01-032 and the revisions of D.17-12-024 pursuant to General Order (GO) 166 Standard 11 and information specified in GO 166 Standard 1, Part E as applicable to Liberty CalPeco's service territory (See Attachment 1). The FPP identifies operational protocols for Liberty CalPeco overhead facilities that lie within Tiers 2 and 3 of the High Fire-Threat District (HFTD) Map adopted by the CPUC on January 19, 2018. The Plan delineates operational pathways in working with electrical assets and overhead facilities that may pose a fire ignition threat under notification of rated fire watch conditions.

The FPP establishes procedures to be followed by the utility for facilities in Tier 2 or 3 of the HFTD or during the Fire Precautionary Period, which is considered to be sustained by the Department of Forestry and Fire Protection (CAL FIRE). Due to the high alpine climate of Liberty CalPeco's electric service territory, late fall and winter months present a seasonal swing of reduced risk due to snow conditions as compared to spring and summer months. Liberty CalPeco personnel operate with consideration of stringent fire safety requirements for high risk areas and conditions. Currently, a combination of Red Flag Warning (RFW) notifications, interpretations from the Reax predictive tool, and information gathered from Liberty CalPeco weather stations will help determine avenues and countermeasures to mitigate the threat of utility-caused fire ignitions during

¹ Navigant Consulting, Inc., a Guidehouse company (Navigant) assisted Liberty CalPeco in preparing this report for filing, based on the information the utility provided. The information presented in this report represents Navigant's professional judgment based on the information available at the time this report was prepared with Liberty CalPeco's overall decision-making. Navigant is not responsible for the reader's use of, or reliance upon, the Plan, or any decisions based on the Plan. NAVIGANT MAKES NO REPRESENTATIONS OR WARRANTIES, EXPRESSED OR IMPLIED. Readers of this Plan are advised that they assume all liabilities incurred by them, or third parties, as a result of their reliance on the Plan, or the data, information, recommendations, and opinions contained in the report.

periods of “Low and Moderate,” “High,” “Very High” and “Extreme” fire ratings. (See Fire Potential Index.) These procedures include practices for field operations and maintenance (O&M) activities in applicable areas and conditions.

The FPP establishes procedures and routine operational practices that:

- 1) Provide employees and contractors an understanding of the enacted processes and procedures that will improve reliable and safe operation of overhead electric facilities in high-risk areas or under fire weather conditions;
- 2) Establish Liberty CalPeco standards of equipment and vehicle use and operations during fire risk seasons and work near potential ignition sources;
- 3) Determine work restrictions during cautionary periods issued by internal meteorological and predictive tools and RFWs, as designated by the National Weather Service (NWS);
- 4) Outline the operational and communication procedures when working adjacent to or immediately after a fire ignition within the service territory;
- 5) Present the future use of the Fire Potential Index (FPI) as it relates to additional risk measurements that may be warranted and discerning the appropriate operational procedures for field activities; and
- 6) Introduce general fire safety considerations and precautions for performing work in high risk areas and/or during high risk weather periods.

DEFINITIONS

Activity: Specific operation of a piece of equipment, such as a chainsaw or tractor.

Baseline Fire Tools: Items available to field personnel to prevent and quickly suppress small ignitions for a designated worksite. These tools include but are not limited to:

Fire Box: Container available at the worksite containing fire suppression equipment and additional as deemed appropriate for the performed activity.

Backpack Pump: Canister containing fire suppressant material.

Shovel: Rounded tip with a length of approximately 48 inches.

Wildland McLeod tool: Fire hand tool used for raking and scraping.

Fire Potential Index: Ranking system that aligns predetermined operational practices with elevated risks restrictions due to the threat of potential ignition. Liberty CalPeco has identified five tiers of risk: low and moderate fire risk, high fire risk, very high fire risk and extreme fire risk.

Fire Safety Leader: Designated field supervisor or crew member who has a ***dedicated*** role for fire safety requirement oversight during extreme fire risk working conditions.

Fire Safety Monitor: Designated field supervisor or crew member responsible for fire safety requirement oversight during Elevated Fire Risk working conditions.

Manager in Charge: Non-represented employee designated by Liberty CalPeco to implement this policy during normal hours of operation.

Mechanical Operations: Any activity that requires the use of motorized power equipment.

On-call Supervisor: Employee designated by Liberty CalPeco to implement this policy in the absence of the Manager in Charge.

Operating Area: Property on which active operations, including transportation, are to be conducted. The area within 100 feet of the traveled surface of roads is generally considered part of the Operating Area, whether or not it is included in the rights-of-way or easements.

Red Flag Warning (RFW): The National Weather Service will typically declare a RFW within a zone when wind gusts exceed 30 miles per hour (mph), and the relative humidity is less than 20 percent for more than three hours. Other factors considered include timber conditions and forecasts for weather elements, such as dry lightning. Typically, the RFW is issued for a specified period.

Fire Weather Watch: A National Weather Service notice which alerts land management agencies of the potential for a Red Flag event in the near future. A forecaster is reasonably confident that Red Flag criteria will be met. Fire Weather Watches are generally issued 12-72 hours in advance of an event, but can be issued in the first 12 hours for dry lightning events.

ASSESSMENT METHODOLOGY

Liberty CalPeco pursued a structured approach to determining whether an FPP was required for Liberty CalPeco facilities under the Rulemaking (R.) 08-11-005, as described in the final decision. The approach utilized the information collected to identify specific facilities that meet the Plan criteria for inclusion in the FPP. This Plan is sufficient for most routine work activities. In the event a project-specific fire plan is deemed necessary, the Project Manager, or Project Manager's designee, will coordinate with field crew to frame additional criteria. The assessment methodology for the FPP is described below.

- 1) **Liberty/Reax Fire Forecast:** Reax is a predictive tool that captures three main methods of fire weather condition measurement: Energy Release Component (ERC), wind gusts, and the Fosberg Fire Weather Index (FFWI). Liberty CalPeco will issue proactive patrols and inspection procedures during applicable work if a triggered scenario is revealed through the predictive software tool. When the Reax tool predicts potential fire weather conditions, the Manager in Charge or designee will refer to the tiered risk categories in this Plan and initiate operational protocols based on the determined rating.
- 2) **Red Flag Warnings:** Fire Weather Zone Boundaries were compared to Liberty CalPeco's service territory, and it was identified that the territory spans portions of three different zones. Liberty

CalPeco will monitor the applicable zones 271, Zone 272, and Zone 273. Historical data for the past 10 years' RFWs within each of these zones was collected for each occurrence, so that wind data could be collected and evaluated for each identified RFW.²

During Red Flag Events, Liberty CalPeco will monitor wind gusts at the peak elevation located at Bliss State Park using the link below or other available data.³

Liberty CalPeco has identified 46 Public Safety Power Shut-off (PSPS) zones that are based on isolation points within certain circuits or areas. If Reax forecasts for these zones that the ERC, wind, and FFWI will come within 80%, 90%, or 100% of the thresholds for de-energization, Liberty CalPeco will enact a PSPS upon or just before reaching 100%. During a PSPS event, Liberty CalPeco will suspend noncritical operational work to focus efforts on current conditions and proactive patrols after de-energizing and when restoring power. Liberty CalPeco adheres to the guidelines provided in R. 18-12-005, an open proceeding that prescribes utilities' PSPS processes, among other issues. Liberty CalPeco will provide updated protocols for internal PSPS practices in the 2020 version of its Wildfire Mitigation Plan.

- 3) **Liberty CalPeco Design Standards:** An engineer examined the Liberty CalPeco facilities design standards to evaluate the minimum standard for wind loading design. The design standard utilizes the criteria specified in GO 95 Section IV. However, this is a minimum design standard, and facilities are often oversized for a variety of reasons. Liberty CalPeco will review applicable wind loading design standards, monitor regulatory changes to standard design requirements, and update standards for minimum wind loading design criteria as deemed prudent.
- 4) **Wind Data:** NWS Remote Automatic Weather Stations were mapped for the area within 25 miles of the Liberty CalPeco service territory. Wind gust data from the NWS site is monitored for each RFQ. The station automatically records the maximum instantaneous gust over the past hour, while wind speed averages are recorded by the stations over 10-minute periods. Because it is not possible to discern if gusts lasted three seconds or more, it is assumed that all maximum gusts meet the three-second criteria to guard against underestimating a fire threat.

In addition to fire weather and fuels data from the NWS and United States Department of Agriculture National Fire Danger Rating System, Liberty CalPeco tracks instantaneous meteorological conditions received from the 10 weather stations in the service territory. Liberty CalPeco also proposes to install 20 additional weather stations during 2020. The server data capturing meteorological conditions will serve as a principle variable underlying the development of the FPI. Until the FPI is developed and adopted by Liberty CalPeco, operational designations for fire ratings will be derived from the meteorological data expressed above.

² Alerts may be monitored using the links below and Liberty CalPeco will make best efforts to subscribe to automatic alert notifications: <http://inws.wrh.noaa.gov/page/faq> and <https://inws.wrh.noaa.gov/alerts>.

³ Bliss State Park: <https://wrcc.dri.edu/cgi-bin/rawMAIN.pl?caCDLB>

- 5) **Mapping:** Tiers 2 and 3 of the HFTD are overlaid on the Liberty CalPeco service territory map. All Liberty CalPeco facilities are mapped without underground facilities, which are not subject to the Plan requirements. Operational work within Tier 2 and 3 of the HFTD or in response to issued RFWs are subject to more stringent fire safety requirements, as described in this Plan. The attached map complies with GO 95 Rule 21.2-D.
- 6) **Fire Potential Index (FPI):** The FPI is used as means to develop guidelines for utility and contractor operations and maintenance crews to follow under Liberty CalPeco's defined categories of wildfire risk. The Wildfire Prevention Department is responsible for determining and communicating the FPI on a daily basis. The current status of the FPI will be posted on the Liberty CalPeco intranet and will communicate the status to the Manager in Charge. The FPI rating framework is currently in development.

FIRE POTENTIAL INDEX

Liberty CalPeco is currently developing a FPI methodology that comprehensively assesses the fire risk utilizing several data points to influence operation and maintenance decisions related field work. The FPI forecasting application captures data from situational awareness tools and seven-day projections and will then present a fire ranking that aligns with a "Low", "Moderate", "High", "Very High" or "Extreme" fire potential. The FPI is scheduled for completion in 2020 and will be included in the FPP for the next filing cycle.

The five FPI Risk conditions are defined as follows:

Extreme Fire Risk: As determined by the Wildfire Prevention Department, Extreme Fire Risk is defined as periods of significant risk of wildfires and the associated ignition risks within Tier 2 or 3 of the HFTD. All O&M activities have stipulations, and significant fire mitigation activities are required. The Extreme Fire Risk status is indicated as "Red."

Very High Fire Risk: As determined by the Wildfire Prevention Department, Very High Fire Risk is defined as periods of increasing risk of wildfires and associated ignition risks within Tier 2 or 3 of the HFTD. Many O&M activities have stipulations and additional fire mitigation activities are required. The Very High Fire Risk status is indicated as "Orange."

High Fire Risk: As determined by the Wildfire Prevention Department, High Fire Risk is defined as periods of increasing risk of wildfires and associated ignition risks within Tier 2 or 3 of the HFTD. Many O&M activities have stipulations and additional fire mitigation activities are sometimes

required. The High Fire Risk status is indicated as “Yellow.”

Moderate Fire Risk: As determined by the Wildfire Prevention Department, Normal Fire Risk is defined as periods where the potential for wildfires and associated ignition risks are not elevated but still exist within Tier 2 or 3 of the HFTD. Some O&M activities may have stipulations and additional fire mitigation activities may be required. The FPI is indicated as “Green.”

Low Fire Risk: As determined by the Wildfire Prevention Department, Normal Fire Risk is defined as periods where the potential for wildfires and associated ignition risks are low but may sometimes still exist within Tier 2 or 3 of the HFTD. Some O&M activities may have stipulations and additional fire mitigation activities may be required. The Low Fire Risk status is the default operational state and the FPI is indicated as “Blue.”

PROCEDURE

General Safety Instructions for Utility and Contractor Crews

- **General Fire Awareness:** During the execution of work activities and use of company equipment and vehicles, all operating personnel must be actively aware and consider actions that may reduce fire risks and personal exposure.
 - Activities such as idling a vehicle near brush, grassland, or at-risk vegetation is prohibited, and drivers should always perform a perimeter check after exiting the vehicle and inspect underneath for potential fuel risk.
 - The Fire Safety Monitor/Leader should remain alert of crew vehicles traveling over low vegetation or brush.
 - Smoking is only permitted in site-specific designated areas or within a 10' clearance of any vegetation or grass.
 - When possible during days with high temperatures and low humidity, wet down adjacent vegetation when performing work with equipment that may spark or has an exposed exhaust system.
 - Consider the need to disable reclosers on potentially impacted equipment or de-energize circuits within the operating area to prevent potential sparks.
- **Safety Briefings:** When assigned to work within wildland areas, the tailboard safety briefing shall include review of the following:
 - 1. The current daily FPI Rating;
 - 2. Job site-specific fire risks;

- 3. Elimination of tasks that pose an elevated fire risk;
 - 4. Actions to reduce personal exposure; and
 - 5. Any other possible fire risk mitigation actions.
- **Fire Safety Tools Responsibility:** The crew leader must check the availability and condition of the baseline fire tools during the daily truck safety inspection and make fire suppression equipment readily accessible near operating areas.
 - **Tailboard Fire Briefings:** If, during the execution of work, the job site-specific fire risks are elevated, the crew leader shall stop work and hold a tailboard meeting to discuss revised actions. If warranted by elevated jobsite risk conditions, the crew leader may elect to declare the next highest level of Fire Potential Index Rating for the job site.
 - **Fire Reporting and Actions:**
 - All fires must be reported to 911, verify and be prepared to report your location.
 - If the work crew cannot quickly extinguish a minor fire or rapidly accelerating fire conditions are encountered, the crew leader shall immediately report the situation to dispatch and relocate the crew, equipment, and materials to a safe location.
 - All fires must be reported to dispatch and follow appropriate incident reporting requirements to the CPUC Safety Enforcement Division (SED).

Safety Instructions for Working Under Extreme Risk Index Conditions

When working under **Extreme** Risk Index conditions, the crew leader shall designate a crew member as a Fire Safety **Leader**. The Fire Safety **Leader** will not be assigned any job site tasks and will be assigned the specific duties of fire risk awareness and prevention, detecting and extinguishing minor fires, and placing the baseline fire tools in a location that is easily accessible by the work crew. Liberty CalPeco will utilize alerts from Reax to determine if a proactive patrol of electrical equipment and vegetation clearances is warranted. Liberty CalPeco will activate proactive fire patrols if forecasted conditions for Fosberg Fire Weather Index and Average Wind Gust reach 90% or greater for PSPS threshold.

Operating Procedures – Extreme Risk Index Conditions

As a general rule, all work should be suspended during Extreme Risk Index conditions		
Activity	Description	Stipulations
<i>Travel with Company Trucks and Vehicles</i>	Paved roads or bare improved roads	Assure fire safety precautions are followed.
	Off-road and unimproved roads	Not Allowed
<i>Facility Inspections and Patrols</i>	Driving inspections of poles, equipment, vegetation and security	Assign a Fire Safety Monitor
	Climbing inspections of poles, equipment, vegetation and security	Assign a Fire Safety Leader
<i>Overhead Line Corrective Maintenance and Repairs</i>	Replacement and/or installation of splices, fuses, lightning arrestors, and insulators	Perform only those activities that reduce wildfire risks and/or restore customer outages; assign a Fire Safety Leader
<i>Pole Setting and Removal</i>	Paved roads or bare improved roads	Perform only those activities that reduce wildfire risks and/or restore customer outages; assign a Fire Safety Leader
	Off-road and unimproved roads	Not allowed
<i>Replacing and Stringing Conductor</i>	Paved roads or bare improved roads	Perform only those activities that reduce wildfire risks and/or restore customer outages; assign a Fire Safety Leader
	Off-road and unimproved roads	Not allowed
<i>Vegetation Management Near Poles and Towers</i>	Use of powered hand tools (chainsaws and weed eaters) to clear low-lying vegetation and noxious and invasive plant control	Not allowed
<i>T&D Overhead Line Vegetation Management</i>	Minor maintenance tree trimming and associated branch removals using buckets and/or hand tools to maintain company clearance standards	Perform only those activities that reduce wildfire risks and/or restore Customer outages; assign a Fire Safety Leader

	Cycle trimming using buckets and/or hand tools to maintain company clearance standards	Not allowed
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Safety Instructions for Working Under Extreme Risk Index Conditions (cont'd.)

When working under **Extreme** Risk Index conditions, the crew leader shall designate a crew member as a Fire Safety **Leader**. The Fire Safety **Leader** will not be assigned any job site tasks and will be assigned the specific duties of fire risk awareness and prevention, detecting and extinguishing minor fires, and placing the baseline fire tools in a location that is easily accessible by the work crew. Liberty CalPeco will utilize alerts from Reax to determine if a proactive patrol of electrical equipment and vegetation clearances is warranted. Liberty CalPeco will activate proactive fire patrols if forecasted conditions for Fosberg Fire Weather Index and Average Wind Gust reach 90% or greater for PSPS threshold.

Operating Procedures – Extreme Risk Index Conditions

As a general rule, all work should be suspended during Extreme Risk Index conditions		
<i>Reciprocating Construction Equipment</i>	Truck mounted compressors and/or generators	Assign a Fire Safety Leader
	Non-truck mounted compressors and/or generators	Not allowed
	Welders and grinders	Not allowed
<i>Blasting</i>	Blasting of rock with explosives	Not allowed

Safety Instructions for Working Under **Very High** Risk Index Conditions

When working under **Very High** Risk Index conditions, the crew leader shall designate a crew member as a Fire Safety Monitor or assign a Fire Safety **Leader**. In addition to the assigned work duties at the job site, the Fire Safety Monitor is responsible for fire risk awareness and prevention, detecting and extinguishing minor fires, and placing the baseline fire tools in a location that is easily accessible by the work crew. **The Fire Safety Leader will not be assigned any job site tasks and will be assigned the specific duties of fire risk awareness and prevention, detecting and extinguishing minor fires, and placing the baseline fire tools in a location that is easily accessible by the work crew.**

Operating Procedures – **Very High** Risk Index Conditions

As a general rule, work may be limited during Elevated Risk Index conditions		
Activity	Description	Stipulations
<i>Travel with Company Trucks and Vehicles</i>	Paved roads or bare improved roads	Assure fire safety precautions are followed.
	Off-road and unimproved roads	Perform only those activities which reduce wildfire risks and/or restore Customer outages; assign a Fire Safety Monitor
<i>Facility Inspections and Patrols</i>	Driving inspections of poles, equipment, vegetation and security	Assure fire safety precautions are followed
	Climbing inspections of poles, equipment, vegetation and security	Assign a Fire Safety Monitor
<i>Overhead Line Corrective Maintenance and Repairs</i>	Replacement and/or installation of splices, fuses, lightning arrestors and insulators	Perform only those activities which reduce wildfire risks and/or restore Customer outages; assign a Fire Safety Monitor
<i>Pole Setting and Removal</i>	Paved roads or bare improved roads	Assign a Fire Safety Monitor
	Off-road and unimproved roads	Perform only those activities which reduce wildfire risks and/or restore Customer outages; assign a Fire Safety Leader
<i>Replacing and Stringing Conductor</i>	Paved roads or bare improved roads	Assign a Fire Safety Monitor
	Off-road and unimproved roads	Perform only those activities which reduce wildfire risks and/or restore Customer outages; assign a Fire Safety Leader
<i>Vegetation Management Near Poles and Towers</i>	Use of powered hand tools (chainsaws and weed eaters) to clear low-lying vegetation and noxious and invasive plant control	Perform only those activities which reduce wildfire risks and/or restore Customer outages
<i>T&D Overhead Line Vegetation Management</i>	Minor maintenance tree trimming using buckets and/or hand tools to maintain company clearance standards	Perform only those activities which reduce wildfire risks and/or restore Customer outages; assign a Fire Safety Monitor
	Cycle trimming and associated tree/branch removals using buckets and/or hand tools to maintain company clearance standards	Perform only those activities which reduce wildfire risks and/or restore Customer outages; assign a Fire Safety Leader
<i>Reciprocating Construction Equip.</i>	Truck/trailer-mounted compressors and/or generators	Assign a Fire Safety Monitor
	Non-truck-mounted compressors and/or generators	Not allowed

	Welders and grinders	Not allowed
Blasting	Blasting of rock with explosives	Not allowed

Safety Instructions for Working Under **High** Risk Index Conditions

When working under **High** Risk Index conditions, the crew leader shall designate a crew member as a Fire Safety Monitor. In addition to the assigned work duties at the job site, the Fire Safety Monitor is responsible for fire risk awareness and prevention, detecting and extinguishing minor fires, and placing the baseline fire tools in a location that is easily accessible by the work crew.

Operating Procedures – **High** Risk Index Conditions

As a general rule, work may be limited during Elevated Risk Index conditions		
Activity	Description	Stipulations
Travel with Company Trucks and Vehicles	Paved roads or bare improved roads	Assure fire safety precautions are followed.
	Off-road and unimproved roads	Perform only those activities which reduce wildfire risks and/or restore Customer outages; assign a Fire Safety Monitor
Facility Inspections and Patrols	Driving inspections of poles, equipment, vegetation and security	Assure fire safety precautions are followed
	climbing inspections of poles, equipment, vegetation and security	Assign a Fire Safety Monitor
Overhead Line Corrective Maintenance and Repairs	Replacement and/or installation of splices, fuses, lightning arrestors and insulators	Perform only those activities which reduce wildfire risks and/or restore Customer outages; assign a Fire Safety Monitor
Pole Setting and Removal	Paved roads or bare improved roads	Assign a Fire Safety Monitor
	Off-road and unimproved roads	Perform only those activities which reduce wildfire risks and/or restore Customer outages; assign a Fire Safety Monitor
Replacing and Stringing Conductor	Paved roads or bare improved roads	Assign a Fire Safety Monitor
	Off-road and unimproved roads	Perform only those activities which reduce wildfire risks and/or restore Customer outages; assign a Fire Safety Monitor
Vegetation Management Near Poles and Towers	Use of powered hand tools (chainsaws and weed eaters) to clear low-lying vegetation and noxious and invasive plant control	Perform only those activities which reduce wildfire risks and/or restore Customer outages
T&D Overhead Line Vegetation Management	Minor maintenance tree trimming using buckets and/or hand tools to maintain company clearance standards	Perform only those activities which reduce wildfire risks and/or restore Customer outages; assign a Fire Safety Monitor
	Cycle trimming and associated tree/branch removals using buckets and/or hand tools to maintain company clearance standards	Perform only those activities which reduce wildfire risks and/or restore Customer outages; assign a Fire Safety Monitor
Reciprocating Construction Equip.	Truck/trailer-mounted compressors and/or generators	Assign a Fire Safety Monitor
	Non-truck-mounted compressors and/or generators	Assign a Fire Safety Monitor
	Welders and grinders	Not allowed

<i>Blasting</i>	Blasting of rock with explosives	Not allowed
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Safety Instructions for Working Under Low / Moderate Risk Index Conditions

When working under Low/Moderate Risk Fire Index conditions, workers should still maintain high awareness of the fire risk and safety hazards within the operating area.

Operating Procedures – Low / Moderate Risk Index Rating

As a general rule, work can proceed during Normal Risk Index conditions following General Safety Instructions		
Activity	Description	Stipulations
<i>Travel with Company Trucks and Vehicles</i>	Paved roads or bare improved roads	No restrictions
	Off-road and unimproved roads	No restrictions
<i>Facility Inspections and Patrols</i>	Driving and climbing inspections of poles, equipment, vegetation and security	No restrictions
<i>Overhead Line Corrective Maintenance and Repairs</i>	Replacement and/or installation of splices, fuses, lightning arrestors and insulators	No restrictions
<i>Pole Setting and Removal</i>	Paved roads or bare improved roads	No restrictions
	Off-road and unimproved roads	No restrictions
<i>Replacing and Stringing Conductor</i>	Paved roads or bare improved roads	No restrictions
	Off-road and unimproved roads	No restrictions
<i>Vegetation Management Near Poles and Towers</i>	Use of powered hand tools (chainsaws and weed eaters) to clear low-lying vegetation and noxious and invasive plant control	No restrictions
<i>T&D Overhead Line Vegetation Management</i>	Minor maintenance tree trimming using buckets and/or hand tools to maintain company clearance standards	No restrictions
	Cycle trimming and associated tree/branch removals using buckets and/or hand tools to maintain company clearance standards	No restrictions
<i>Reciprocating Construction Equipment</i>	Truck mounted compressors and/or generators	No restrictions
	Non-truck mounted compressors and/or generators	Assign a Fire Safety Monitor
	Welders and grinders	Assign a Fire Safety Monitor
<i>Blasting</i>	Blasting of rock with explosives	Truck must have permit with restrictions; assign a Fire Safety Monitor

ACTIVE FIRE SAFETY PRECAUTIONS

Liberty CalPeco values safety as a core competency of field and hot work performed in high risk areas. For all contractors and utility personnel, these precautions exist for critical work performed within Tiers 2 and 3 of the HTFD under threat of wildland fire. If a small fire ignites call 911 and be prepared to verify and provide your location. If rapid suppression is not achieved by field personnel, field crew are directed to stop work, retreat to a safe area adjacent to the work site, immediately notify dispatch services, and alert nearby agencies and entities.

All contractors and utility personnel working adjacent to active wildland fires should consider the following:

- Use Personal Protective Equipment (P.P.E.) when directed to work within, or adjacent to uncontrolled fire perimeter.
- Maintain communication lines through operational protocols when a fire ignites. This includes correspondence made with office and dispatch centers, local law and fire agencies, customers, and impacted jurisdictions, if any.⁴ The Incident Commander (IC), once designated, should coordinate and effectuate these activities.
- Take increased precaution when driving near flames or in smoky conditions. Road obstructions may pose a risk, and drivers and crew should have a general awareness of nearby access and evacuation routes.
- Determine if any potentially impacted electrical assets will pose a risk to spreading the active wildland fire and de-energize if necessary or if requested by fire agency. Field crews should adhere to Liberty CalPeco procedures where applicable.
- Perform any routine investigations after fire suppression. Report incident data to SED and execute necessary reporting procedures as part of Liberty CalPeco business practices.

ATTACHMENTS

- 1) Attachment 1- Liberty CalPeco service territory map
- 2) Attachment 2- Liberty CalPeco service territory overlaid with the HFTD

⁴ Notifications to customers during and post-fire suppression should occur in English and Spanish.

LIBERTY UTILITIES SERVICE TERRITORY MAP



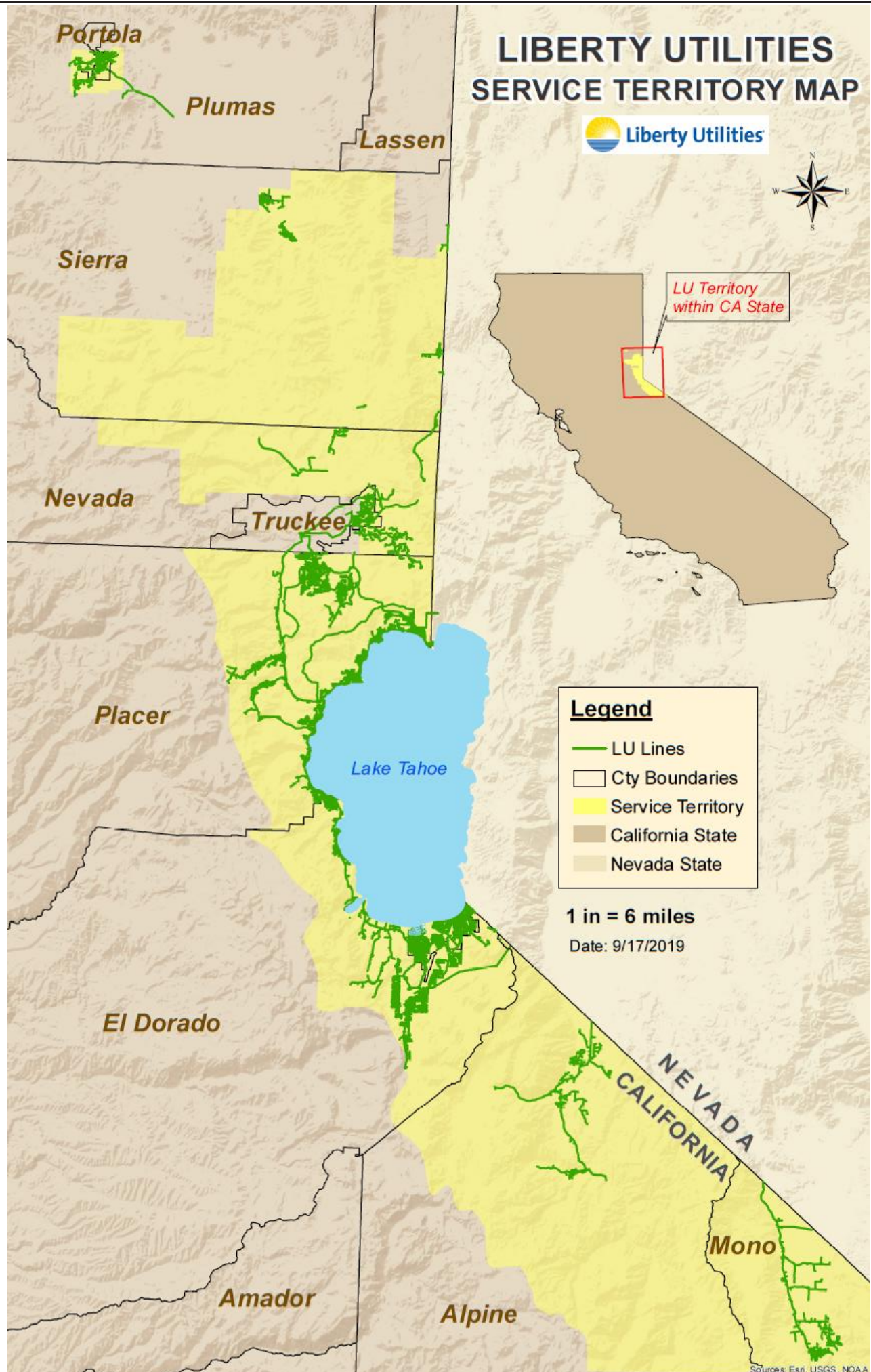
LU Territory
within CA State

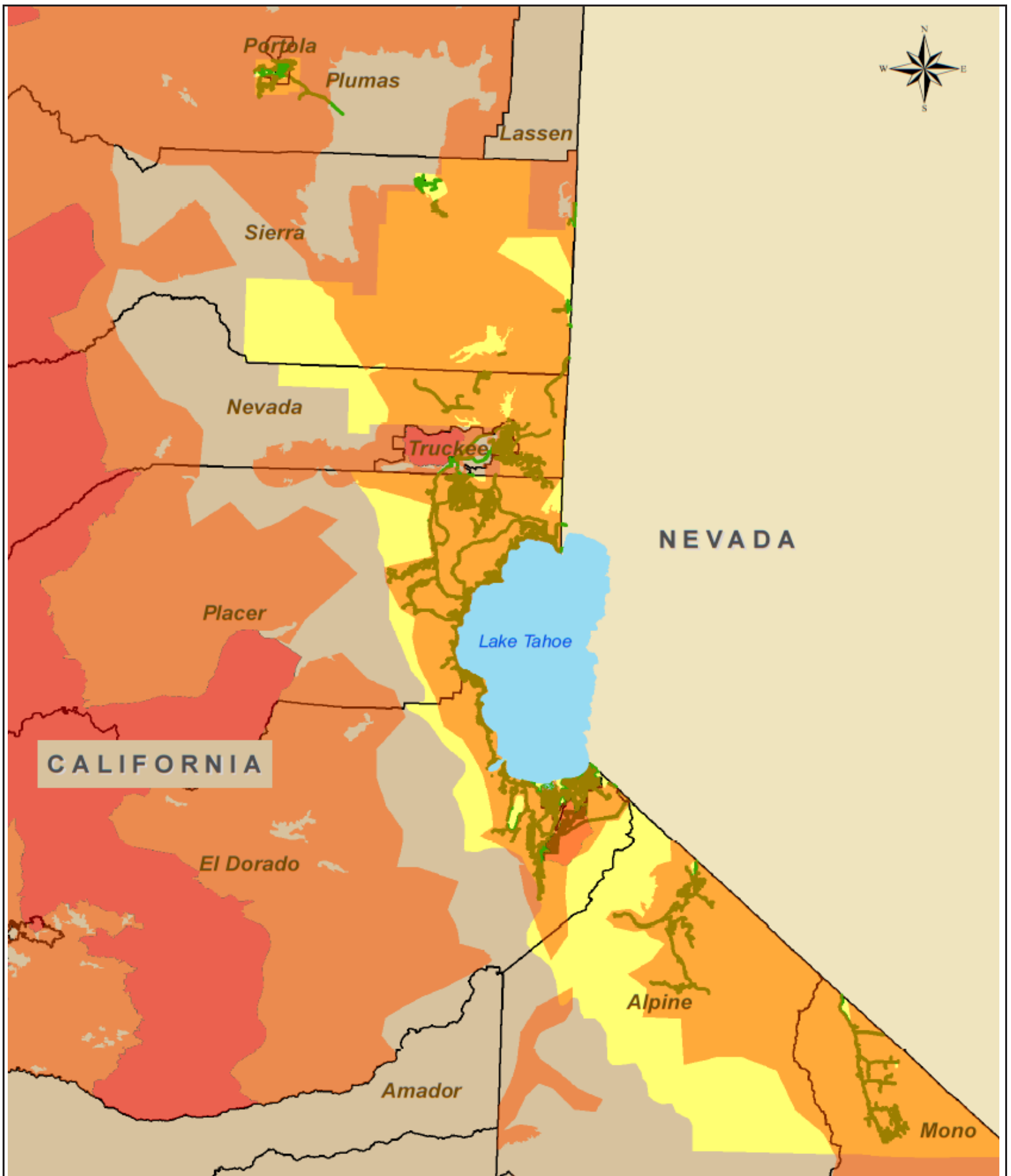
Legend

- LU Lines
- Cty Boundaries
- Service Territory
- California State
- Nevada State

1 in = 6 miles

Date: 9/17/2019





Legend

- LU Lines
- California
- Nevada
- Service Territory
- Tier 2 Fire Threat
- Tier 3 Fire Threat

**HIGH FIRE THREAT WITHIN
LIBERTY UTILITIES
SERVICE TERRITORY**

Date: 6/27/2019

1 in = 11 miles

Liberty Utilities
701 National Ave
Tahoe Vista, CA 96148