

**BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF CALIFORNIA**

Order Instituting Rulemaking to Implement  
Electric Utility Wildfire Mitigation Plans Pursuant  
to Senate Bill 901 (2018).

Rulemaking 18-10-007  
(filed October 25, 2018)

**REPLY COMMENTS OF LIBERTY UTILITIES (CALPECO ELECTRIC) LLC (U 933-E)**

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April 16, 2020

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Pursuant to Resolution WSD-001, issued January 16, 2020, Liberty Utilities (CalPeco Electric) LLC (“Liberty CalPeco”) respectfully submits these Reply Comments responding to party Comments on Liberty CalPeco’s 2019 Wildfire Mitigation Plan (“WMP”). These comments respond to recommendations to the Wildfire Safety Division (“WSD”) made by Public Advocates Office (“Cal Advocates”) and Rural County Representatives of California (“RCRC”).

**I. REPLY TO CAL ADVOCATES’ COMMENTS**

In Opening Comments, Cal Advocates states, “Liberty’s WMP consists of a comprehensive evaluation of resources capabilities and system-wide assets to reduce overall risk.”<sup>1</sup> Cal Advocates also “recommends that the WSD approve Liberty’s 2020 WMP on the condition that Liberty provide quarterly progress reports on its system-wide survey, inventory database, and upgrades to its GIS system.”<sup>2</sup> Liberty CalPeco does not oppose these conditions.

While Cal Advocates does not make any specific recommendations related to Liberty CalPeco’s 2020 WMP and supports its approval, it does make some recommendations to WSD related to Liberty

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<sup>1</sup> Cal Advocates Opening Comments, p. 36.

<sup>2</sup> Cal Advocates Opening Comments, p. 39.

CalPeco's 2021 WMP. Cal Advocates recommends that WSD should require Liberty CalPeco to submit a new three-year plan and provide a full GIS asset survey,<sup>3</sup> address the issue of resource and staffing constraints,<sup>4</sup> and provide and clearly label all geospatial data in its next WMP submission.<sup>5</sup>

**A. Liberty CalPeco has always planned to submit a revised three-year plan in its 2021 WMP based on the results of the asset inventory survey**

Liberty CalPeco intends to complete a full system survey in 2020 that will provide a complete look at the system and enable Liberty CalPeco to identify and mitigate hazards at a programmatic level on a system-wide basis in 2021. Liberty CalPeco has always planned to submit a new three-year plan in its 2021 WMP filing based on the results of the system survey.

Liberty CalPeco has made significant progress already. Liberty CalPeco issued an RFP and initiated a pilot project earlier this month to begin the survey and test the application that will be used to capture data. In addition to the survey, Liberty CalPeco's chosen contractor will also complete a system-wide inspection of all overhead equipment to identify necessary equipment repairs and replacements. Liberty CalPeco will evaluate all of this information in developing a revised plan to be included in the 2021 WMP.

**B. Liberty CalPeco has made significant progress in building its WMP team and has filled seven of the 10 positions included in its 2020 WMP**

In its 2020 WMP, Liberty CalPeco discussed its plan to hire 10 additional employees this year to create a wildfire mitigation team.<sup>6</sup> Seven of the 10 positions have already been filled. Liberty CalPeco expects to complete its wildfire mitigation hiring in the next few months.

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<sup>3</sup> Cal Advocates Opening Comments, p. 38.

<sup>4</sup> Cal Advocates Opening Comments, p. 54.

<sup>5</sup> Cal Advocates Opening Comments, p. 37.

<sup>6</sup> Liberty CalPeco WMP, p. 108.

In its 2021 WMP, Liberty CalPeco will continue to share its plans for meeting resource needs to complete all the forecast programs and projects identified to best mitigate wildfire risk in its service territory.

**C. Liberty CalPeco’s geospatial data will be significantly improved in its 2021 WMP**

This year’s completion of the system survey will also yield the benefit of improved geospatial data that Liberty CalPeco can provide. Liberty CalPeco anticipates that the geospatial data it provides in its 2021 WMP will be significantly better than what was provided in the 2020 WMP. As Liberty CalPeco undertakes the system survey this year, Liberty CalPeco will update its geographic information system (“GIS”) with additional fields and details that the Commission and other parties wish to see, and this data will also help Liberty CalPeco better forecast and plan its WMP work in 2021 and beyond.

**II. REPLY TO RCRC’S COMMENTS**

In Opening Comments, RCRC incorrectly states that Liberty CalPeco “does not necessarily consider undergrounding as an alternative outside the Rule 20 program.”<sup>7</sup> As explained in its WMP, Liberty CalPeco considered undergrounding lines as a potential alternative to covered conductor.<sup>8</sup> While Liberty CalPeco included no specific undergrounding projects in its 2020 WMP, “underground projects may be evaluated in the future if they will greatly reduce risk in a particular area and are deemed cost-effective.”<sup>9</sup>

**III. CONCLUSION**

Liberty CalPeco appreciates this opportunity to respond to party Comments and looks forward to working with the Commission and other stakeholders to mitigate the risk of wildfires in California.

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<sup>7</sup> RCRC Opening Comments, p. 4.

<sup>8</sup> Liberty CalPeco WMP, p. 56.

<sup>9</sup> Liberty CalPeco WMP, p. 56.

Respectfully submitted,

*/s/ Dan Marsh*

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