

**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)

**LIBERTY UTILITIES (CALPECO ELECTRIC) LLC'S (U 933-E) QUARTERLY REPORT ON
2020 WILDFIRE MITIGATION PLAN FOR QUARTER 3**

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December 9, 2020

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Pursuant to the Wildfire Safety Division (WSD) Resolutions WSD-002 and WSD-007 ratified on June 11, 2020, associated with Rulemaking (“R.”) 18-10-007, Liberty Utilities (CalPeco Electric) LLC (“Liberty”) hereby files this Quarterly Report on the Liberty 2020 Wildfire Mitigation Plan (2020 WMP). This Quarterly Report addresses the ongoing reporting requirements identified in WSD Condition LIB-5 and WSD Condition Guidance-10. Additionally, Liberty provides updated Quarter 3 (Q3) data for 2020 WMP progress and performance metrics.

I. LIBERTY SPECIFIC DEFICIENCIES IDENTIFIED IN WSD-007

A. Deficiency (LIB-5, Class B): *Data Governance*

Liberty’s data governance program including its GIS data and asset inventory requires improvement before the 2021 WMP filing. Liberty is directed to:

- 1) Include in quarterly reports to the WSD updates on the progress of its data governance upgrades, until Liberty’s system-wide survey, asset inventory database, and upgrades to its GIS system have modernized or Liberty is otherwise directed.

i. Liberty Response to LIB-5 Condition:

With this Quarterly Report, Liberty includes an updated version of the GIS status report file

provided by WSD: “WSD_GIS_DataSchema_StatusReport_20201209”.

II. IOU GUIDANCE IDENTIFIED IN WSD-002

A. Deficiency (Guidance-10, Class B): *Data issues – general*

Although the availability of data, including GIS data, provides unprecedented insight into utility infrastructure and operations, inconsistencies and gaps in the data present a number of challenges and hurdles. As it relates to GIS data, electrical corporation submissions often had inconsistent file formats and naming conventions, contained little to no metadata, were incomplete or missing many data attributes and utilized varying schema. These deficiencies rendered cross-utility comparisons impossible without substantive, resource- and time-consuming manipulation of the data. Additional data challenges included varying interpretations of WMP Guideline data requirements, leading to inconsistency of data submitted.

Electrical corporations shall ensure that all future data submissions to the WSD adhere to the data taxonomy and schema developed by the WSD.

i. Liberty Response to Guidance-10 Condition:

As stated in Liberty’s response to the LIB-5 Condition, Liberty includes with this Quarterly Report an updated version of the GIS status report file provided by WSD: “WSD_GIS_DataSchema_StatusReport_20201209”. Additionally, Liberty provides GIS files in accordance with the WSD GIS data reporting requirements that show asset inspection work completed to date in the data folder: “LU_20201209.gdb”. Liberty is unable to provide some of the GIS data reporting requirements because Liberty is implementing a new enterprise GIS system upgrade that will enhance Liberty’s ability to collect, store, and report crucial WMP data. The system is scheduled to go live in August 2021. This implementation was initiated before the WSD data requirements were known and is a complex undertaking involving multiple stakeholders throughout the organization. Because Liberty’s existing GIS system is in the processes of a complete overhaul, including a total redesign of the geodatabase (“GDB”) schema and a complete migration from the geometric network to the utility network

(“UN”), this is causing complications with converting the existing GDB schema to the UN GDB schema and the WSD GDB schema. Eventually, Liberty’s existing geometric network geodatabase will be non-existent and converted to the UN version. Liberty’s consultants understand the situation and have the sample of the WSD GDB and schemas and are working with Liberty to provide the necessary workflows to transmit Liberty UN format into the WSD geometric network format. Liberty has provided the asset lines and points in the WSD GDB and will continue to update this data and add additional non-electric distribution features and layers, including weather stations and cameras, to the WSD schema. This work will have to be redone when Liberty’s UN version is deployed.

III. NON-SPATIAL DATA SUBMISSION

A. Liberty WMP Progress and Performance Metrics

Liberty provides updated data through Q3 2020 on progress and performance metrics related to Liberty’s 2020 WMP in the following file: “WMP Progress Tracking 2020_20201209_FINAL”.

IV. CONCLUSION

Liberty appreciates this opportunity to provide this Quarterly Report on its 2020 WMP and looks forward to working with the Commission and other stakeholders to advance Liberty’s wildfire mitigation planning efforts.

Respectfully submitted,

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