

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

Order Instituting Rulemaking to Examine
Electric Utility De-Energization of Power
Lines in Dangerous Conditions.

Rulemaking 18-12-005
(Filed December 13, 2018)

**LIBERTY UTILITIES (CALPECO ELECTRIC) LLC'S (U 933-E)
DE-ENERGIZATION PHASE 2 GUIDELINES PROGRESS REPORT 1**

Dated: August 5, 2020

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Pursuant to Decision (“D.”) 20-05-051 Ordering Paragraph (“OP”) 4, Liberty Utilities (CalPeco Electric) LLC (“Liberty CalPeco”) presents this first of two reports on its progress in implementing of the Phase 2 updated and additional guidelines for the de-energization of electric facilities to mitigate wildfire risk. This progress report is arranged in the same manner as the guidelines set forth in D.20-05-051, Appendix A.

A. Working Groups and Advisory Boards

Liberty CalPeco will participate in the working groups that the large investor-owned utilities are required to convene. Liberty CalPeco hopes to learn from the information shared during these working groups to refine its de-energization protocols, if necessary.

Liberty CalPeco has established service territory-wide advisory boards to provide hands-on, direct advisory functions regarding all aspects of de-energization. These advisory boards are in each of the four regions served by Liberty CalPeco—the Sierra and Plumas County Board, Nevada and Placer County Board, the El Dorado County Board, and the Mono and Alpine County Board. Each of these service territory-wide advisory boards is comprised of public safety partners, communications and water service providers, local and tribal government officials, business groups, non-profit organizations, representatives of people/communities with access

and functional needs and vulnerable communities, and academic organizations. These advisory boards will advise on best practices for de-energization issues and safety, community preparedness, regional coordination, and the optimal use of existing and emerging technologies. The boards are chartered to meet quarterly, emulating the approach SDG&E has implemented with its wildfire advisory board. Liberty CalPeco plans to begin advisory board meetings in fall 2020.

B. De-Energization Exercises

On June 25, 2020, Liberty CalPeco held a comprehensive simulated Public Safety Power Shutoff (“PSPS”) exercise to test its PSPS protocols and procedures. The exercise, which was held virtually due to COVID-19, facilitated the testing of Incident Command System (“ICS”) response in a virtual setting. Participants walked through a multi-day PSPS simulation that targeted Liberty CalPeco’s Tier 3 region, one of the highest fire risk areas in its service territory. The key objectives of the exercises were to test the following:

- Usability and comprehensiveness of Liberty CalPeco’s PSPS Operations and Communications Playbooks and how they sync with ICS.
- Implementation of ICS in response to a PSPS scenario.
- Procedures for de-energization and re-energization in response to PSPS conditions.

After experiencing the initial scenario and four simulated days of updates, Liberty CalPeco conducted a post-event review to discuss successes and identify areas of improvement. In addition to 45 internal participants, Liberty CalPeco invited external partners from the CPUC, Governor’s Office of Emergency Services (“Cal OES”), California Department of Forestry and Fire Protection (“CAL FIRE”), local fire districts, public safety partners (“PSPs”), and critical infrastructure providers from all seven counties in its service territory. Overall, Liberty CalPeco received very positive assessments from external attendees regarding the format of the exercise.

Liberty CalPeco welcomes continued feedback and participation from its external

partners as it continues to strengthen its program. Liberty CalPeco will continue to coordinate with the CPUC, CalFire, CalOES, communications providers, representatives of people/communities with access and functional needs (“AFN”), and other PSPs to plan the next simulated de-energization exercise.

C. Who Should Receive Notice, When Should Notice Occur, and How Should Notice Occur?

Liberty CalPeco held PSPS Tabletop Functional Exercises June 25, 2020. Objectives for the tabletop included exercises for incident command, communications, and operational response. Liberty CalPeco invited Cal OES, county, and local governments to the exercises. Liberty CalPeco asked all attendees to provide input, so adjustments could be implemented.

Liberty CalPeco continues to invite Cal OES, county, and local governments to its PSPS and Wildfire Mitigation workshops to attend and/or to present. In addition, Liberty CalPeco has reached out to identify community based organizations to help reach its AFN populations. This list includes independent living homes.

D. Community Resource Centers

In coordination with the communities that it serves, Liberty CalPeco has established a network of Community Resource Centers (“CRCs”) to assist communities in real time during extreme weather events. Meeting the safety needs for AFN and vulnerable populations requires assembling and analyzing local demographic data, as well as the company database of medical baseline (“MBL”) customers. The establishment of CRCs was informed by presentations and discussions in seven town hall meetings held in each of seven communities in the service area. Plan creation included consultation with regional local government, advisory boards, PSPs, AFN representatives, tribal representatives, senior citizen groups, business owners, community resource organizations, and public health and healthcare providers.

If Liberty CalPeco anticipates an extended power shutoff, CRCs will be opened in affected areas. The CRC locations were identified through a process that included input from fire and meteorological experts and consideration of those areas most prone to extreme weather, as

indicated by historical data. CRCs will have back-up power and are located in areas that are contiguous to zones that would not be shut off in the event of a PSPS event.

All CRCs are located in fixed facility locations known to the public. They are Americans with Disabilities Act-compliant and meet the needs of AFN, medical baseline, and other utility customers. Federal Emergency Management Agency June 2020 Mass Care Emergency Assistance Pandemic Planning Considerations were consulted to confirm the CRCs have adequate space for estimated occupancy and comply with social distancing and public health protocols.

Each CRC site meets fire codes and has at least two egress routes. Once activated, CRCs will operate in 14-hour shifts from 8:00 AM to 10:00 PM daily, until power to the affected community has been restored. The CRCs will provide device charging stations, cellular network services, chairs, and restrooms. Volunteer organizations will provide bottled water and snacks to area residents. Pre-identified Liberty CalPeco subject matter experts will collaborate with volunteer staff at activated CRCs to communicate real-time PSPS updates directly to impacted community members.

E. Restoration of Power Service Upon Conclusion of Public Safety Need for De -Energization

Liberty CalPeco will restore power service upon conclusion of a de-energization event according to guidance described in D.20-05-051 Appendix A, Section (e).

F. Transportation, Communications, and Water System Resilience

Liberty CalPeco's Wildfire Prevention Department has worked to fulfill its responsibility to safeguard its PSPs, critical infrastructure, and critical facilities from being significantly impacted during potential PSPS events.

The team has coordinated with fire departments, law enforcement agencies, public safety access points, communications/telecommunications providers, hospitals, water and sewer utilities, public transportation agencies, and schools. Liberty CalPeco has reached out to local, tribal, federal, state, county and private sectors to determine if critical facilities are equipped with

back-up power.

Liberty CalPeco's service area is primarily in the alpine climate of the Sierra Nevada Mountains of Northern California. Climate conditions range from mild summers to frequent blizzard conditions during long winters. Given these conditions, all of the PSPs and most of the water and sewer utility providers have back-up power generation.

Since March 2020, Liberty CalPeco has reached out to all PSPs and others listed above in its Tier 3 high fire-threat district ("HFTD") to verify back-up power generation capability. Liberty CalPeco is now focused on providing that level of capacity with those organizations and agencies in the larger service area. Following completion of this effort, Liberty CalPeco will determine whether there may be advantages to a coordination program to increase resiliency for MBL and AFN customers.

Additionally, the PSPS Resiliency Corridor Program, which is in development, will utilize a combination of infrastructure hardening and back-up generation to leverage existing underground lines during PSPS events. This can be accomplished through the strategic placement of back-up generation or hardening of overhead power lines to enable underground portions of a circuit to remain energized during PSPS events. The program will prioritize existing underground lines that primarily feed service-providing commercial customers, such as grocery stores, pharmacies, and gas stations. The program will allow some of these critical businesses to remain open during PSPS events and provide valuable services to customers during potential outages.

G. Medical Baseline and Access and Functional Needs Populations

To assist customers and communities during the COVID-19 public health emergency, Liberty CalPeco has suspended service disconnections for non-payment. This temporary suspension includes residential and business customers. Customers who have questions or who may be facing potential hardship are encouraged to contact the customer service departments. Liberty CalPeco offers a variety of payment options and can assist customers with payment

arrangements if needed.

Liberty CalPeco will collaborate with public safety partners, local governments, and representatives of AFN communities to identify assistance (including evacuation plans) required by current and potentially eligible MBL customers during de-energization events. Liberty CalPeco also plans to address these issues during meetings with its advisory boards, which will include PSPs, communications and water service providers, local and tribal government officials, business groups, non-profit organizations, and representatives of people/communities with AFN and vulnerable communities.

To identify MBL customers for an event, Liberty CalPeco pulls a list of master meter locations to determine if these meters are in the PSPS de-energization zone. Each master meter has a database that provides behind-the-meter information. From this database, Liberty CalPeco can determine if there are MBL customers, who they are, and what units they occupy. Contact information can be generated through each customer's Medical Baseline Customer application. The MBL notification sequence is as follows:

1. Everbridge Notification
2. If no positive contact, phone call to customer from customer service representative.
3. If no positive contact, physical site visit to the residence.
4. If no positive contact, door hanger notification left at the residence.

Liberty CalPeco has notified nine tribal communities of its Wildfire Mitigation Plan and PSPS process. It has received responses from three. Liberty CalPeco sent these communities materials on the PSPS protocol, as well as a link to the website that explains the Wildfire Mitigation Plan. One tribe stated it does not have any communities in Liberty CalPeco's service area; however, it may be unaware of some citizens. Liberty CalPeco continues to follow up with the other tribal communities and is awaiting responses.

H. Transparency

Liberty CalPeco has revamped its Wildfire Mitigation website to provide both regulatory

and customer information. Liberty CalPeco is working on a section of the website that will highlight and explain each wildfire mitigation effort/project—completed, in progress, and/or planned—that will reduce wildfire risk and the likelihood of a PSPS. In addition, Liberty CalPeco produces an annual consumer wildfire mitigation brochure, provided as Attachment A. The brochure includes progress, milestones met, and other updates in each edition. Finally, all wildfire mitigation efforts are reviewed and discussed during town halls and other stakeholder meetings.

I. Definitions

Liberty CalPeco includes public safety answering points in the definition of critical facilities, so 9-1-1 emergency services receive priority notification and any additional assistance necessary to promote resiliency during de-energization events. Liberty CalPeco also includes the transportation sector (including facilities associated with automobile, rail, aviation, major public transportation, and maritime transportation for civilian and military purposes) in its list of critical facilities.

Respectfully submitted,

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Appendix A

2020 Wildfire Mitigation Plan Brochure

INFRASTRUCTURE HARDENING

Infrastructure hardening is an ongoing system infrastructure improvement and replacement process aimed at lowering the potential of fires sparked by electric infrastructure. These improvements will require several years to implement and will include some of the following projects:

COVERED CONDUCTORS

Covered conductors are wires surrounded by layers of insulated coverings that protect from contact while energized. Although bare wires have traditionally been used in California as a reliable, cost-effective solution, Liberty Utilities will be replacing bare conductors with covered conductors in high fire risk areas to reduce wildfire risk.

POLE LOAD TESTING & REPLACEMENT

Liberty Utilities understands that failing poles pose safety, reliability and fire risks. To prevent pole failure, Liberty Utilities is accelerating the testing and replacement of poles systemwide.

FUSE REPLACEMENT

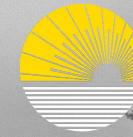
Conventional fuses, when operated, expel hot particles and gases, which can start fires. In contrast, current limiting fuses, traditionally used for protecting "equipment," expel no materials and provide for a high level of reliability. In order to mitigate the risk of wildfire, Liberty Utilities proposes to replace conventional fuses with current limiting fuses on much of its system over the coming years.

REPLACEMENT OF BROCKWAY SUBSTATION

The Brockway Substation in Kings Beach is a 60-year-old facility that was constructed with wooden poles and cross arms and obsolete oil-circuit breakers. This facility has been deemed a fire hazard and is scheduled to be decommissioned and replaced.

UNDERGROUNDING

Liberty Utilities continues to underground sections of the power grid and will do so for the next few years.



Liberty Utilities



WILDFIRE MITIGATION PLAN

WHAT YOU NEED TO KNOW

Liberty Utilities is taking precautionary steps to protect the community from wildfires by implementing a robust wildfire mitigation plan. The best way to stay informed about power shutoffs, vegetation management and system upgrades is to ensure your personal contact information Liberty Utilities has on file is up-to-date.

To update your contact information, customers can:



1-800-782-2506:



LibertyUtilities.com

Catastrophic wildfires have become all too common in California. To mitigate the risk of wildfires in the communities we serve, Liberty Utilities is taking aggressive steps to keep you and your family safe.

As seen in recent years, a single spark can quickly turn into a fire capable of destroying entire communities.

Liberty Utilities is acutely aware of the significant fire risk in the Lake Tahoe Basin and surrounding forested areas that make up its service territory. Drought and bark beetle infestation have devastated portions of our local forest, slowly suffocating the life out of the trees that dot our landscape. These dying trees now serve as ideal fuel for the wildfires that threaten our community's safety.

There are measures we can take to protect the local community from the threat of wildfire, which is why Liberty Utilities recently implemented a wildfire mitigation plan that was developed to address local factors that could put our region at risk.

LOCAL AND RESPONSIVE. WE CARE.

The spark of a wildfire can come from a cigarette butt, a campfire or even electric infrastructure. It is impossible to predict when or where a wildfire may start, but certain factors such as an evolving climate, dry forests and high wind conditions have most of the Golden State on high alert.

Here are a few steps Liberty Utilities is taking to protect you and your family:

VEGETATION MANAGEMENT

INSPECTION

Liberty Utilities' crews are deployed year-round throughout the region to inspect trees and vegetation in the vicinity of power lines. In order to comply with state law and safety best practices, any trees or branches that have grown too close to power lines will be trimmed or removed to mitigate any wildfire risk.

The majority of the tree and vegetation management work is executed from May through October, but work continues through the winter months and can include the daunting task of removing vegetation debris after snow storms.

Liberty Utilities has increased its vegetation management program investment to approximately

\$6 MILLION ANNUALLY

to ensure all trees and vegetation near power lines are trimmed or removed within the appropriate time frame.

REMOVAL & NOTIFICATION

When trees are identified for trimming, crews are instructed to prune branches and vegetation back to a minimum of 12 feet from the high voltage power lines to ensure adequate clearance is maintained over the maintenance cycle period. Crews will additionally identify any trees for removal that are dead, diseased or structurally unsound, despite being within the acceptable clearance zone, if they have the potential to fall on power lines.

When trees need to be removed, Liberty Utilities and its contractors will notify the property owner prior to starting work via a doorhanger.

Customers should never attempt to conduct the tree trimming activities themselves, due to the risk of coming in contact with power lines during the process.

Liberty Utilities offers complimentary tree-trimming services to customers who believe a tree or branch may be hazardous to nearby electric infrastructure. If you spot a tree or branch you feel may be a hazard, submit a tree trimming request at LibertyUtilities.com or



Call 530-546-1787



PUBLIC SAFETY POWER SHUTOFF

A Public Safety Power Shutoff (PSPS) is the process by which an electric utility may proactively turn off power in certain areas when and where weather conditions create a high wildfire risk. The implementation of a PSPS, which is becoming more and more frequent, is supported by the State of California as a safety best practice.

WEATHER & ENVIRONMENTAL CONDITIONS

Liberty Utilities has deployed weather stations throughout the local service area, and collaborates with fire weather experts, the National Weather Service, and local fire officials to monitor local weather conditions.



PUBLIC SAFETY POWER SHUTOFF CRITERIA

While no single factor will drive a Public Safety Power Shutoff, some factors include:

- ✓ RED FLAG WARNING
- ✓ LOW HUMIDITY
- ✓ DRY FUEL CONDITIONS
- ✓ FORECAST SUSTAINED WINDS & GUSTS
- ✓ HEAT/TEMPERATURE

NOTIFICATION

In the event that a PSPS is a possibility, Liberty Utilities will alert customers, local government and safety agencies of the potential need to shut off power and keep the community apprised as weather conditions evolve. Customers are encouraged to follow the utility on Twitter (@LibertyUtil_CA) and Facebook (@LibertyUtilitiesLT) to receive timely updates on power outages, planned or unplanned.