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Marybel Batjer
President
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102-3298

Dear President Batjer:

Thank you for the follow-up letter regarding Liberty's August 2021 Public Safety Power Shutoff (PSPS) Public Briefing. Liberty is committed to keeping the California Public Utilities Commission (CPUC), other state agencies, and the public informed about the status of our preparedness for the 2021 wildfire season and potential PSPS events. Liberty shares the same concern expressed in your letter for the safety and well-being of our customers and all Californians.

Below is Liberty's response to your August 31, 2021 letter:

1. **PSPS Decision Making:** An update on your company's plan to borrow and learn from PG&E, SCE, and SDG&E, and implement a more robust and sophisticated decision-making model.

In developing its PSPS decision making criteria, Liberty incorporated known fire and weather indices, such as Energy Release Component, Fosberg Fire Weather Index, Wind Speed, and Burning Index, which are used by other utilities. Liberty developed its PSPS decision-making model with Reax Engineering, which has worked with other California IOUs. Liberty first established PSPS thresholds in 2019 and provided this information in its 2019 Wildfire Mitigation Plan (WMP). At that time, the large IOUs (PG&E, SCE, and SDG&E) did not provide PSPS thresholds in their WMPs, and the small IOUs (Liberty, PacifiCorp, and Bear Valley) did provide PSPS thresholds in their WMPs. Since implementing its real-time fire weather monitoring program in 2019, Liberty remains open to engaging with other IOUs for information sharing and to further improve its PSPS decision-making. Liberty plans to actively participate in other IOU PSPS exercises.

2. **Medical Baseline Customers and Equipment:** An update on your company's plan to expand medical baseline program and support these customers during PSPS events by offering transportation and lodging services. In addition, please describe any plans you may have to deploy batteries to these customers and educate them on operating the batteries.

Liberty expects to file its Resiliency Program with the Commission in Q4 of 2021. The program is a Behind-the-Meter (BTM) Battery Storage Program that will be offered to Liberty's medical baseline (Greencross), Critical Facilities, and Large Commercial (A3) Customers. The program will be structured as a resiliency as a service (RaaS), where customers are expected to pay a monthly fee to Liberty for use of batteries during a winter storm outage or PSPS. For medical baseline customers, Liberty will provide this service at a significantly lower rate (\$10/month), and, for medical baseline customers who also qualify for Liberty's low-income California Alternate Rates for Energy (CARE) rate, the RaaS charge will be free (\$0). Liberty estimates that approximately 50% of its medical baseline customers qualify for the CARE rate. The battery systems will be owned and operated by Liberty, with the intention being that Liberty will optimize the batteries for the purpose of reducing the monthly demand charge under the NV Energy Services Agreement and apply the benefit to all Liberty customers.

In 2021, Liberty sent a survey to all 290 registered medical baseline customers. The result was a 30% response rate and an overwhelmingly positive response to the Resiliency Program concept. The details of the survey results will be provided in Liberty's Resiliency Program application. The survey results did highlight a small subset of the medical baseline customers who are either renting or living in a multi-dwelling home, where an installed battery might not be feasible. Liberty plans to provide resources to these customers to assist with having their own portable system or another alternative solution. Liberty is exploring additional support services to medical baseline customers during potential PSPS events, including transportation and lodging services. Liberty's difficult terrain and widespread service territory will make it challenging to provide transportation and shelter for all medical baseline customers during a PSPS event. However, Liberty will continue to work with its customers on this issue and seeks CPUC and stakeholder input on how to most efficiently and cost-effectively develop these additional transportation and shelter services. Liberty has also reached out to the other California IOUs to collaborate on best practices related to this issue.

3. **PSPS Exercises:** An update on your company's plan to conduct functional exercises, not tabletop exercises. This is especially important due to your company's lack of experience in PPS execution. Has your company conducted functional exercises specifically on operating Community Resource Centers (CRCs)? What actions are you taking to ensure CRCs will be operational, ideally located, and properly staffed if they are needed?

In coordination with the communities that Liberty serves, Liberty has established a network of Community Resource Centers (CRCs) to assist communities in real time during extreme weather events. The planning factors for meeting the safety needs for access and functional needs and vulnerable populations have included local demographic data, as well Liberty's database of medical baseline customers. The establishment of CRCs was informed by presentations and

discussions in seven Town Hall Meetings held in each of seven communities within Liberty's service area. The plan creation included consultation with regional local governments, advisory boards, public safety partners, representatives of people/communities with access and functional needs, tribal representatives, senior citizen groups, business owners, community resource organizations, and public health and healthcare providers. Liberty selected these CRC locations through a rigorous process, which included input from fire and meteorological experts, as well as identification of areas most prone to extreme weather, according to historical data. The CRCs will either have backup power or are located in areas that are contiguous to PSPS zones that would not be shut off in the event of a PSPS. Most CRCs are in fixed facility locations known to the public. The CRCs are compliant with the Americans with Disabilities Act (ADA) and meet the needs of people with access and functional needs, including medical baseline customers and other access and functional needs customers. 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 a.m. to 10:00 p.m. daily until power to the affected community has been restored. Liberty contractors will provide bottled water and snacks to impacted area residents. Liberty subject matter experts will collaborate with volunteer staff at activated CRCs to communicate real-time PSPS updates directly to impacted community members. Liberty has a functional exercise set up for October 28, 2021, which will include operating CRCs. This exercise was delayed due to Liberty's emergency response to the Caldor Fire.

4. **Wildfire Mitigation:** Please provide an update on your planned vegetation management activities for this year. When will the work be completed?

Liberty describes the following nine vegetation management and inspection activities in its 2021 Wildfire Mitigation Plan (WMP) Update:

1. Efforts to manage community and environmental impacts
2. Detailed inspections of vegetation
3. Fuel management and reduction of slash
4. LiDAR inspections of vegetation
5. Patrol inspections of vegetation
6. Quality assurance/quality control
7. Remediation of at-risk species
8. Removal and remediation of trees with strike potential
9. Vegetation management to achieve clearances around electric lines and structures

When developing its annual vegetation management plan, Liberty forecasts the amount of work that can be accomplished within the calendar year and sets targets for each activity included in the WMP. Although this summer has required that many vegetation management crews be redirected from planned activities to meet the demand for resources needed to respond to wildfires in the region, Liberty is working to complete the vegetation management activity projections in its 2021 WMP Update by the end of the year. The table below provides the 2021 projected progress for each initiative and the actual progress accomplished for the year as of June 30, 2021. An additional update on planned management activities will be available when Liberty submits its forthcoming 2021 Q3 Quarterly Initiative Update.

Vegetation Management Initiative Activity	Unit of Measure	2021 Projection	2021 Actual¹
Efforts to Manage Community and Environmental Impacts	Line Miles Treated	13	0
Detailed Inspections of Vegetation	Line Miles Inspected	207	76.7
Fuel Management and Reduction of Slash	Tons of Biomass Removed	2100	106.8
LiDAR Inspections of Vegetation	Line Miles Inspected	730	0
Patrol Inspections of Vegetation	Line Miles Inspected	150	59.1
Quality Assurance/Quality Control	Line Miles Inspected	136	0
Remediation of At-Risk Species	Line Miles Treated	230	134.8
Removal and Remediation of Trees With Strike Potential	Line Miles Treated	150	116
Vegetation Management to Achieve Clearances Around Electric Lines and Structures	Line Miles Treated	328	298.5
¹ 2021 actual work accomplished through June 30 th			

5. **Access and Functional Needs (AFN) customers:** How are you working to identify the number of AFN customers in your service territory beyond self-identification, especially in high fire risk areas?

In addition to developing a website for AFN customer self-identification that will go live this month, Liberty has identified and contacted the following types of businesses to identify medical baseline customers in its service area:

- Home oxygen companies
- Dialysis providers
- Home healthcare services
- Skilled nursing facilities
- VA community care
- Food bank and family resources providers

Liberty also utilizes bill inserts, emails, social media, and paid advertising (print, digital, and radio) to inform and encourage enrollment.

Furthermore, Liberty will add two new positions to support community-based organization (CBO) and AFN outreach. The two new positions and responsibilities are as follows:

1. *Community Outreach Coordinator (Bilingual):* This position will support the outreach, planning, implementation, and reporting of Liberty’s public purpose programs to its customers. This position will be responsible for exploring innovative solutions to support Liberty’s low-income and AFN populations.

2. *Business and Community Development Manager*: This position will strengthen and expand AFN, tribal communities, Public Safety Partners, and CBO partnerships throughout Liberty's service territory. Through community relationship-building, this position will identify and develop community resource center (CRC) locations throughout Liberty's service territory and will promote messaging of PSPS and wildfire readiness with key external stakeholders.

Liberty is also participating in AFN and IOU Leadership Council working groups to collaborate with stakeholders and determine best practices for supporting AFN populations.

6. **PSPS Thresholds**: What is the range of wind thresholds at which you would consider calling a PSPS event? How is covered conductor increasing those thresholds? Please provide specific numbers.

The current range of wind thresholds at which Liberty considers calling a PSPS event starts at 40 miles per hour. Liberty does not currently have enough covered conductor installed to impact a PSPS event and has not yet established specific wind thresholds for covered conductor. Wind thresholds for lines with covered conductor will be higher than thresholds for bare conductor. Liberty is currently participating in a joint IOU workstream and reviewing peer utilities' assessments on the effectiveness of covered conductor to better understand how other IOUs' PSPS thresholds are impacted when covered conductor is utilized.

Please let us know if you have any questions or require additional information.

Sincerely,



Chris Alario
President
Liberty Utilities