

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



**FILED**

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Application of Liberty Utilities (CalPeco Electric)  
LLC (U 933-E) for Authority to Among Other Things,  
Increase Its Authorized Revenues for Electric Service,  
Update Its Energy Cost Adjustment Clause Billing  
Factors, Establish Marginal Costs, Allocate Revenues,  
And Design Rates, as of January 1, 2022.

Application 21-05-017  
(Filed May 28, 2021)

**AMENDED 2022 RISK SPENDING ACCOUNTABILITY REPORT OF  
LIBERTY UTILITIES (CALPECO ELECTRIC) LLC (U 933-E)**

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May 5, 2023

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

Application of Liberty Utilities (CalPeco Electric) LLC (U 933-E) for Authority to Among Other Things, Increase Its Authorized Revenues for Electric Service, Update Its Energy Cost Adjustment Clause Billing Factors, Establish Marginal Costs, Allocate Revenues, And Design Rates, as of January 1, 2022.

Application 21-05-017  
(Filed May 28, 2021)

**AMENDED 2022 RISK SPENDING ACCOUNTABILITY REPORT OF  
LIBERTY UTILITIES (CALPECO ELECTRIC) LLC (U 933-E)**

In accordance with California Public Utilities Code Section 591 and Decision (“D.”) 19-04-020, Liberty Utilities (CalPeco Electric) LLC (“Liberty”) hereby submits its Amended 2022 Risk Spending Accountability Report (“RSAR”) to include the RSAR tables that were inadvertently left off the initial filing, attached hereto as Appendix A.

Dated: May 5, 2023

Respectfully submitted,

/s/

\_\_\_\_\_  
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**Appendix A**

**Liberty Utilities (CalPeco Electric) LLC 2022 Risk Spending Accountability Report**

May 1, 2023

## **Liberty Utilities (CalPeco Electric) LLC (U-933-E)**

### **2022 Risk Spending Accountability Report**

Liberty Utilities (CalPeco Electric) LLC (U 933-E) (“Liberty”) submits its 2022 Risk Spending Accountability Report (“RSAR”) pursuant to Cal. Pub. Util. Code § 591 and California Public Utilities Commission (“Commission”) Decision (“D.”) 22-10-002.

#### **Background**

Cal. Pub. Util. Code § 591(a) states, “The commission shall require an electrical or gas corporation to annually notify the commission, as part of an ongoing proceeding or in a report otherwise required to be submitted to the commission, of each time since that notification was last provided that capital or expense revenue authorized by the commission for maintenance, safety, or reliability was redirected by the electrical or gas corporation to other purposes.”

Ordering Paragraph 5 of D.22-10-002 orders Liberty to file its annual RSAR on May 1 each year.

Liberty continues to report on spending in all safety, reliability, and maintenance programs, including the specific projects identified in its 2022 GRC Decision. This report provides a comparison of Liberty’s authorized and recorded 2021/2022 capital and 2022 O&M spending related to safety, reliability, and maintenance.

The last GRC in which capital and O&M spending was authorized was Liberty’s 2022 GRC (A.23-04-043), which was approved on April 27, 2023. The Decision authorized 2022-2024 capital and 2022 O&M spending.

In total, the 2022 GRC Decision authorized 2021/2022 capital expenditures of \$88.643 million, including \$64.134 million for SRM programs. Liberty recorded \$92.593 million in total capital expenditures, including \$66.617 million for SRM programs. The \$2.483 excess spending on SRM programs included higher costs than authorized for wildfire mitigation programs. The 2022 GRC Decision authorized \$19.348 million in SRM-related O&M expenses. Liberty recorded \$31.032 million in SRM-related O&M expenses. The overrun was mostly associated with ramping up of the WMP program. Liberty’s 2022 GRC forecast was based on Liberty’s 2021 WMP, while the work performed in 2022 was based on Liberty’s 2022 WMP.

Attachments 1 and 2 provide comparisons of Liberty’s 2021/2022 recorded and authorized capital expenditures and 2022 O&M expenses related to maintenance, safety, and reliability. Liberty’s detailed RSAR is attached to this filing.

**Liberty Utilities (CalPeco Electric) LLC**  
**2022 RSAR Capital Expenditures \$(thousands)**

	GRC-Authorized			Recorded			Variance			Variance Explanation	Program Status	Units		
	2021	2022	Total	2021	2022	Total	2021	2022	Total			Authorized	Recorded	
<b>Distribution</b>														
Pole Replacements Per Test	470	483	953	256	26	282	(214)	(457)	(671)	Fewer poles were identified than expected	Planned	n/a	n/a	No units to track
Overhead Failures/Services	1,692	1,738	3,430	813	3,023	3,836	(879)	1,285	406	Reactive account - work based on failures	Planned	n/a	n/a	No units to track
Underground Failures/Services	1,034	1,062	2,096	1,469	1,792	3,261	435	730	1,165	Reactive account - work based on failures	Planned	n/a	n/a	No units to track
Distribution Rebuilds – OH	2,296	2,500	4,796	834	804	1,638	(1,462)	(1,696)	(3,158)	Reactive account - work based on failures	Planned	n/a	n/a	No units to track
Distribution Rebuilds – UG	361	1,500	1,861	619	423	1,043	258	(1,077)	(818)	Reactive account - work based on failures	Planned	n/a	n/a	No units to track
Submersible Transformer Replace	500	5	505	582	33	615	82	28	110	Slight cost overrun	Planned	n/a	n/a	No units to track
Claims	419	430	849	(162)	368	206	(581)	(62)	(643)	Reactive account - work based on incidents	Planned	n/a	n/a	No units to track
Street & Highway Improvements	336	345	681	-	-	-	(336)	(345)	(681)	Reactive account - based on projects	Deferred	n/a	n/a	No units to track
<b>Total</b>	<b>7,108</b>	<b>8,063</b>	<b>15,171</b>	<b>4,412</b>	<b>6,469</b>	<b>10,880</b>	<b>(2,696)</b>	<b>(1,594)</b>	<b>(4,291)</b>					
<b>Substation</b>														
625/650 Phase 2B	7,074	-	7,074	6,254	2,890	9,144	(820)	2,890	2,070	Cost overrun	Planned	n/a	n/a	Specific project, no units to track
Portola Substation	-	-	-	31	619	651	31	619	651	Project timing moved up, project continues in 2023	Planned	n/a	n/a	Specific project, no units to track
Squaw Valley Substation	-	100	100	-	-	-	-	(100)	(100)	Project deferred to 2023-2024	Deferred	n/a	n/a	Specific project, no units to track
Squaw Valley/Tahoe City CBs	382	400	782	-	-	-	(382)	(400)	(782)	Project deferred to 2023-2024	Deferred	n/a	n/a	Specific project, no units to track
Stampede Substation	25	-	25	-	-	-	(25)	-	(25)	Project deferred to 2023-2024	Deferred	n/a	n/a	Specific project, no units to track
Stateline Substation	-	100	100	-	-	-	-	(100)	(100)	Project deferred to 2023-2024	Deferred	n/a	n/a	Specific project, no units to track
Prosser Substation	-	25	25	-	-	-	-	(25)	(25)	Project deferred to 2023-2024	Deferred	n/a	n/a	Specific project, no units to track
Substation Fencing	561	50	611	108	755	863	(453)	705	252	Cost overrun	Planned	n/a	n/a	Specific project, no units to track
Emergency Substation Equipment	625	642	1,267	248	363	611	(377)	(279)	(656)	Costs less than anticipated	Planned	n/a	n/a	Specific project, no units to track
Substation Spare Transformer	25	900	925	-	-	-	(25)	(900)	(925)	Project deferred to 2023-2024	Deferred	n/a	n/a	Specific project, no units to track
Other Substation Capital	332	96	428	0	234	235	(332)	138	(193)	Miscellaneous - reactive-based projects	Planned	n/a	n/a	Specific project, no units to track
<b>Total</b>	<b>9,024</b>	<b>2,313</b>	<b>11,337</b>	<b>6,642</b>	<b>4,862</b>	<b>11,504</b>	<b>(2,382)</b>	<b>2,549</b>	<b>167</b>					
<b>WMP Covered Conductor*</b>														
Tahoe City 7300	1,259	788	2,047	6	73	79	(1,253)	(715)	(1,968)	Project deferred to 2023-2024	Deferred	n/a	n/a	Specific project, no units to track
Topaz 1261	300	500	800	-	4	4	(300)	(496)	(796)	Project deferred to 2023-2024	Deferred	n/a	n/a	Specific project, no units to track
Meyers 3300	2,303	3,235	5,538	3,803	220	4,022	1,500	(3,015)	(1,516)	Costs lower than anticipated	Planned	n/a	n/a	Specific project, no units to track
Meyers 3400	4,990	3,000	7,990	6,870	4,754	11,624	1,880	1,754	3,634	Costs higher than anticipated	Planned	n/a	n/a	Specific project, no units to track
640A Line	-	50	50	65	6	71	65	(44)	21	Preliminary work, majority of costs in 2023-2024	Planned	n/a	n/a	Specific project, no units to track
640B Line	-	100	100	23	1	24	23	(99)	(76)	Preliminary work, majority of costs in 2023-2024	Planned	n/a	n/a	Specific project, no units to track
Brockway 5100	-	100	100	-	-	-	-	(100)	(100)	Project deferred to 2023-2024	Planned	n/a	n/a	Specific project, no units to track
Brockway 4202	644	293	937	663	901	1,565	19	608	628	Costs higher than anticipated	Planned	n/a	n/a	Specific project, no units to track
Stateline 2300	-	25	25	-	6	6	-	(19)	(19)	Preliminary work, majority of costs in 2023-2024	Planned	n/a	n/a	Specific project, no units to track
Hobart 7700	450	3,649	4,099	445	1,523	1,968	(5)	(2,126)	(2,131)	Project ongoing in 2023	Planned	n/a	n/a	Specific project, no units to track
<b>Total</b>	<b>9,946</b>	<b>11,740</b>	<b>21,686</b>	<b>11,875</b>	<b>7,488</b>	<b>19,363</b>	<b>1,929</b>	<b>(4,252)</b>	<b>(2,323)</b>					
<b>WMP Other*</b>														
Pole Replacements	4,500	4,500	9,000	5,335	6,727	12,061	835	2,227	3,061	Liberty replaced more poles than forecast	Planned	231	437	
Fuse Replacements	867	891	1,758	615	3,423	4,038	(252)	2,532	2,280	Liberty replaced more fuses than forecast	Planned	1,500	2,725	
Tree Attachments	560	573	1,133	657	1,025	1,682	97	452	549	Liberty removed more attachments than forecast	Planned	105	182	
Wire Upgrades	600	350	950	604	3,949	4,553	4	3,599	3,603	Liberty did significantly more upgrades than forecast	Planned	n/a	n/a	No units to track
Auto Reclosers	300	360	660	419	191	610	119	(169)	(50)		Planned	4	4	
CALFire Exempt Hardware	-	500	500	-	-	-	-	(500)	(500)	Project deferred to 2023-2024	Deferred	n/a	n/a	Specific project, no units to track
Substation Animal Guarding	804	300	1,104	719	719	1,437	(85)	419	333	Higher than anticipated costs	Planned	n/a	n/a	Specific project, no units to track
Weather Stations	-	135	135	3	18	21	3	(117)	(114)	Additional installations deferred to 2023	Deferred	n/a	n/a	Specific project, no units to track
DFA	-	150	150	18	48	66	18	(102)	(84)	Partially deferred to 2023/2024	Planned	n/a	n/a	Specific project, no units to track
HIFD	-	100	100	-	-	-	-	(100)	(100)	Project deferred to 2023-2024	Deferred	n/a	n/a	Specific project, no units to track
LIDAR	400	-	400	350	-	350	(50)	-	(50)	Costs slightly lower than forecast	Planned	n/a	n/a	Specific project, no units to track
T&E	50	-	50	47	4	51	(3)	4	1		Planned	n/a	n/a	Specific project, no units to track
<b>Total</b>	<b>8,081</b>	<b>7,859</b>	<b>15,940</b>	<b>8,768</b>	<b>16,102</b>	<b>24,870</b>	<b>687</b>	<b>8,243</b>	<b>8,930</b>					
<b>Total SRM Programs</b>	<b>34,159</b>	<b>29,975</b>	<b>64,134</b>	<b>31,696</b>	<b>34,920</b>	<b>66,617</b>	<b>(2,463)</b>	<b>4,945</b>	<b>2,483</b>					
<b>Total Other Capital</b>	<b>8,115</b>	<b>16,394</b>	<b>24,509</b>	<b>12,470</b>	<b>13,505</b>	<b>25,976</b>	<b>4,355</b>	<b>(2,889)</b>	<b>1,467</b>					
<b>Total Capital Spending</b>	<b>42,274</b>	<b>46,369</b>	<b>88,643</b>	<b>44,167</b>	<b>48,426</b>	<b>92,593</b>	<b>1,893</b>	<b>2,057</b>	<b>3,950</b>					

\*The GRC forecast for WMP projects and programs was based on Liberty's 2021 WMP. Actual work performed in 2022 was based on Liberty's 2022 WMP.

**Liberty Utilities (CalPeco Electric) LLC**  
**2022 RSAR O&M Expenses \$(thousands)**

Account	2022 Expenses			
	Authorized	Recorded	Variance	
<b>Distribution Operation</b>				
581	Load Dispatching	636	588	(48)
582	Station Expenses	28	20	(8)
583	Overhead Line Expenses	89	482	393
584	Underground Line Expenses	56	52	(4)
585	Street Lighting/Signal Systems	2	2	-
586	Meters	9	29	20
588	Miscellaneous	2,211	2,389	178
	<b>Total</b>	<b>3,031</b>	<b>3,562</b>	<b>531</b>
<b>Distribution Maintenance</b>				
591	Structures	27	7	(20)
592	Station Equipment	82	497	415
593	Overhead Lines	2,000	2,973	973
594	Underground Lines	563	417	(146)
596	Street Lighting/Signal Systems	9	23	14
597	Meters	69	93	24
598	Miscellaneous	817	1,030	213
	<b>Total</b>	<b>3,567</b>	<b>5,040</b>	<b>1,473</b>
<b>Wildfire Mitigation</b>				
599	WMP Expenses	1,750	6,012	4,262
599	Vegetation Management	11,000	16,418	5,418
	<b>Total</b>	<b>12,750</b>	<b>22,430</b>	<b>9,680</b>
	<b>Total SRM O&amp;M</b>	<b>19,348</b>	<b>31,032</b>	<b>11,684</b>

Variance Analysis

Distribution Operations and Maintenance

Liberty did significantly more maintenance work on its distribution system than it forecast in the GRC due to findings in its full system survey to address GO 165 issues.

Wildfire Mitigation

Liberty has ramped up its work on its WMP plan work. The GRC forecast for wildfire mitigation was based on Liberty's 2021 WMP, but the work performed was based on Liberty's 2022 WMP.