



Liberty  
933 Eloise Avenue  
South Lake Tahoe, CA 96150  
Tel: 800-782-2506  
libertyutilities.com

November 21, 2022

Leslie Palmer, Director  
Safety and Enforcement Division  
California Public Utilities Commission  
505 Van Ness Avenue  
San Francisco, CA 94102

**Re: Liberty Post-Event Report on NV Energy Potential Public Safety Outage Management (“PSOM”) Event on October 21, 2022**

Dear Director Palmer:

Pursuant to an email dated November 4, 2022 from CPUC staff attorney Matthew Yergovich, Liberty Utilities (CalPeco Electric) LLC (“Liberty”) submits the attached Post-Event Report on the NV Energy Potential Public Safety Outage Management (PSOM) Event that ultimately did not occur on October 21, 2022. Because the CPUC’s regulations and guidelines do not address post-event reporting requirements regarding a PSOM event executed by a third party outside of California, Liberty requested CPUC guidance on this matter. The November 4, 2022 email directed Liberty to submit post-event reporting for this matter. In accordance with that guidance, Liberty submits the attached report, which has been verified by an officer of Liberty in pursuant to Rule 1.11 of the Commission’s Rules of Practice and Procedure. This report will also be distributed to the service list of Rulemaking (R.) 18-12-005.

The November 4, 2022 email from Matthew Yergovich posed a number of questions to Liberty, which Liberty will address below.<sup>1</sup> The CPUC’s questions and comments are italicized.

Liberty initially asked, “Is it the CPUC’s contention that it is a utility’s obligation to report on an event over which it has no ownership or control? What CPUC decisions or other authority support this position? Please cite specific language, so we may follow accordingly.” The CPUC responded:

***The first sentence of Resolution ESRB-8 states that the de-energization reasonableness, public notification, mitigation and reporting requirements are extended to all electric IOUs. The first sentence of D.19-05-042 establishes that the decision adopts de-energization (Public Safety Power Shut-off or PSPS) communication and notification guidelines for all electric IOUs along with enumerated updates. The Phase 2 (D.20-05-051), 3 (D.21-06-034) and other PSPS decisions similarly apply to such proactive power shutoffs. All these guidelines are rooted in the IOU’s safety obligations stemming from PUC section 451 and 399.2(a).***

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<sup>1</sup> The entirety of the November 4, 2022 email is attached hereto as Appendix A.



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Resolution ESRB-8, CPUC decisions, and the California Public Utilities Code govern only electric utilities in California. Consequently, these rules, regulations, and guidelines do not apply to NV Energy or NV Energy's PSOM events. The aforementioned sources do not address how or whether a utility (such as Liberty) should report on an event that is executed by a third-party non-California entity (such as NV Energy).

***Liberty indicated that it coordinated with Nevada Energy (NVE) regarding some aspects of these proactive safety deenergization event(s) (that we understand NVE calls "PSOM" and the Commission calls "PSPS") and therefore was involved with such event(s). Liberty's post event reporting should include details about such coordination. For example, did Liberty receive notice from NVE about such deenergization; has Liberty demanded/required the same?***

Contrary to Mr. Yergovich's assertion, Liberty never indicated that it coordinated with NV Energy about NV Energy's PSOM. If anything, Liberty repeatedly stressed to the CPUC that Liberty is **not** involved in any way with NV Energy's deliberation or decision-making process regarding NV Energy's PSOM event; the determination of whether to execute an NV Energy PSOM event resides with NV Energy only. Liberty cannot weigh in on whether NV Energy should implement a PSOM any more than Liberty's public safety partners can weigh in on whether Liberty should implement a PSPS. Such a decision is properly controlled solely by the power provider. Liberty did receive notice from NV Energy about NV Energy's potential PSOM event, which is documented in the attached report. Liberty did not "demand" or "require" this notice from NV Energy; Liberty has no such authority or control over NV Energy. Liberty does engage with NV Energy throughout the year to discuss communication timelines between NV Energy and Liberty when NV Energy is monitoring a possible PSOM event that would impact Liberty's electric system, which is also discussed in the attached report.

***Has Liberty alerted NVE to any factors that might affect the deenergization decisionmaking, like affected customer information or line risks/non-risks? Does Liberty coordinate with NVE to honor the important themes established in the Commission's body of regulations including noticing, reporting and mitigation of deenergization effects?***

NV Energy's de-energization decision-making regarding PSOM events is at NV Energy's sole discretion as the power provider. As such, Liberty has not inappropriately inserted itself into NV Energy's deliberation process. Liberty is not and cannot be responsible for NV Energy's noticing, reporting, and mitigation of de-energization effects.

***Can Liberty please confirm our definition of "PSOM" is correct or provide the correct definition? This can be provided in the post event report.***

Information about NV Energy's PSOM events may be found on NV Energy's website:  
<https://www.nvenergy.com/safety/psom>



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Per NV Energy's website, "Public Safety Outage Management (PSOM) means that NV Energy will shut off power in extreme fire-risk areas when certain environmental conditions are met in order to help prevent power lines and other equipment from causing a wildfire. NV Energy acknowledges that this is a difficult decision, and PSOM will only be used as a last resort."

In response to Liberty's question, "What should Liberty call this report, as it is not a PSPS post-event report?" the CPUC responded, ***"This is a public safety power shutoff event but it is unclear whether and to what extent Liberty coordinated with NVE in instituting the event on Liberty's lines. It is therefore a PSPS post event report."***

Liberty has unequivocally informed the CPUC that Liberty has no involvement with NV Energy's instituting NV Energy's PSOM events. A PSOM is not a PSPS. NV Energy—a third party outside of California that is not subject to CPUC jurisdiction—has total control over a PSOM event. A PSOM is not Liberty's event. In contrast, Liberty has control over and knowledge about its own PSPS events, which enables Liberty to provide the information required in PSPS post-event reporting. Because a PSOM is not Liberty's event, Liberty lacks certain information to provide the same level of detail in any post-PSOM reporting because such information is available only to NV Energy, the owner of the PSOM event.

***There are open questions about whether and to what extent Liberty informs the ultimate deenergization decisionmaking involved in these events. The post event reporting will inform us about this.***

Liberty does not participate in any decision-making regarding the implementation of NV Energy's PSOM event.

Liberty plans to continue our discussions with the CPUC on this issue of post-PSOM reporting, as there remains no established authority on how Liberty should proceed in these instances. Simply assigning all PSPS post-reporting requirements to an event over which Liberty has no control is neither reasonable nor practically feasible. Liberty looks forward to working collaboratively with the CPUC to develop a process that takes into consideration Liberty's lack of decision-making and control over NV Energy's PSOM events yet still supports customer awareness, safety, and furtherance of CPUC objectives.

Sincerely,

A handwritten signature in black ink, appearing to read "Jordan Parrillo".

Jordan Parrillo  
Manager, Regulatory Affairs  
Liberty



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cc: [ESRB\\_ComplianceFilings@cpuc.ca.gov](mailto:ESRB_ComplianceFilings@cpuc.ca.gov)

Anthony Noll, [Anthony.Noll@cpuc.ca.gov](mailto:Anthony.Noll@cpuc.ca.gov)



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**Liberty Utilities (CalPeco Electric) LLC  
Post-Event Reporting on NV Energy Potential Public Safety Outage  
Management (“PSOM”) Event on October 21, 2022**

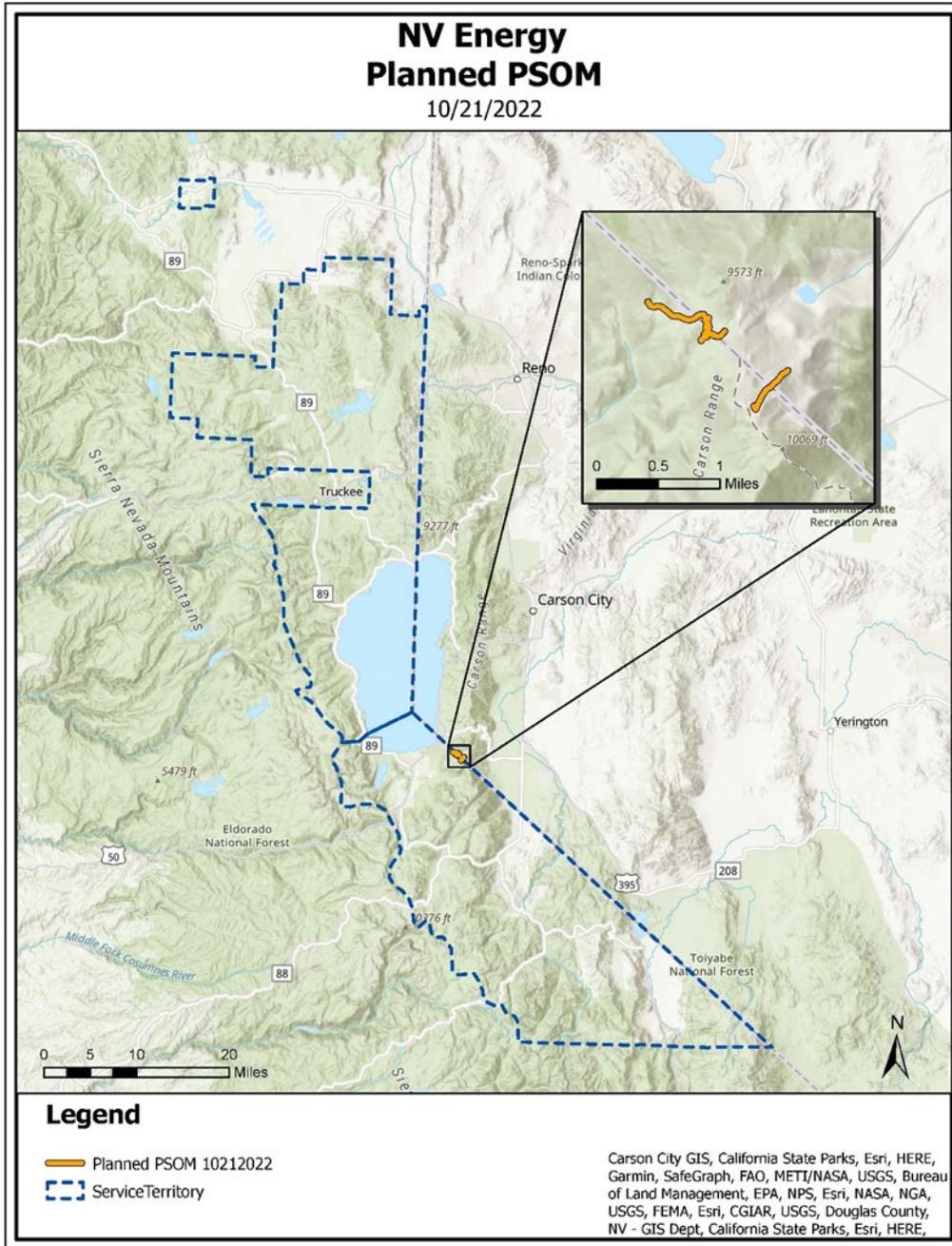
**Submitted to:  
California Public Utilities Commission  
Director of the Safety and Enforcement Division  
November 21, 2022**

## 1 Executive Summary

On October 19, 2022 at 6:14 p.m., NV Energy notified Liberty Utilities (CalPeco Electric) LLC (“Liberty”) that NV Energy was monitoring a potential Public Safety Outage Management (“PSOM”) event starting between 9:00 p.m. on October 21, 2022 and 1:00 a.m. on October 22, 2022 and ending at 3:00 p.m. on October 22, 2022. NV Energy’s PSOM event being monitored could have potentially impacted one Liberty customer in Liberty’s service territory. The map below depicts the Liberty area in El Dorado County that would have been impacted if NV Energy had executed NV Energy’s potential PSOM event. Liberty notified the potentially impacted customer on October 20, 2022 at 11:30 a.m. NV Energy determined that its PSOM event was ultimately not required.

The CPUC’s regulations and guidelines do not appear to contemplate post-event reporting requirements regarding a PSOM event executed by a non-California third party (NV Energy) that impacts Liberty’s power lines and customers. In this absence of explicit standards regarding a PSOM event executed by a non-California third party over which Liberty has no control, Liberty requested CPUC guidance on this matter. The CPUC provided email guidance on November 3-4, 2022 indicating that Liberty should submit post-event reporting for NV Energy’s potential PSOM event by November 21, 2022. Liberty hereby submits this Post-Event Report for NV Energy’s Potential PSOM Event on October 21, 2022 in accordance with this email guidance. In separate sections of this report, Liberty provides the information that it possesses regarding the NV Energy potential PSOM event on October 21, 2022.

Figure 1-1: Map of Potentially De-energized Liberty Area, October 21, 2022 NV Energy Potential PSOM Event



## 2 Decision-Making Process

NV Energy's PSOM events are executed at NV Energy's sole discretion. Liberty is not involved with NV Energy's decision-making regarding NV Energy's PSOM events.

### 2.1 Fuel Conditions

Not applicable.

### 2.2 Wind and Weather Conditions

Not applicable.

### 2.3 Description of alternatives considered including sectionalizing, patrols, and other mitigation

Not applicable.

### 2.4 Establish why the de-energization was a necessary, last resort mitigation measure

Not applicable.

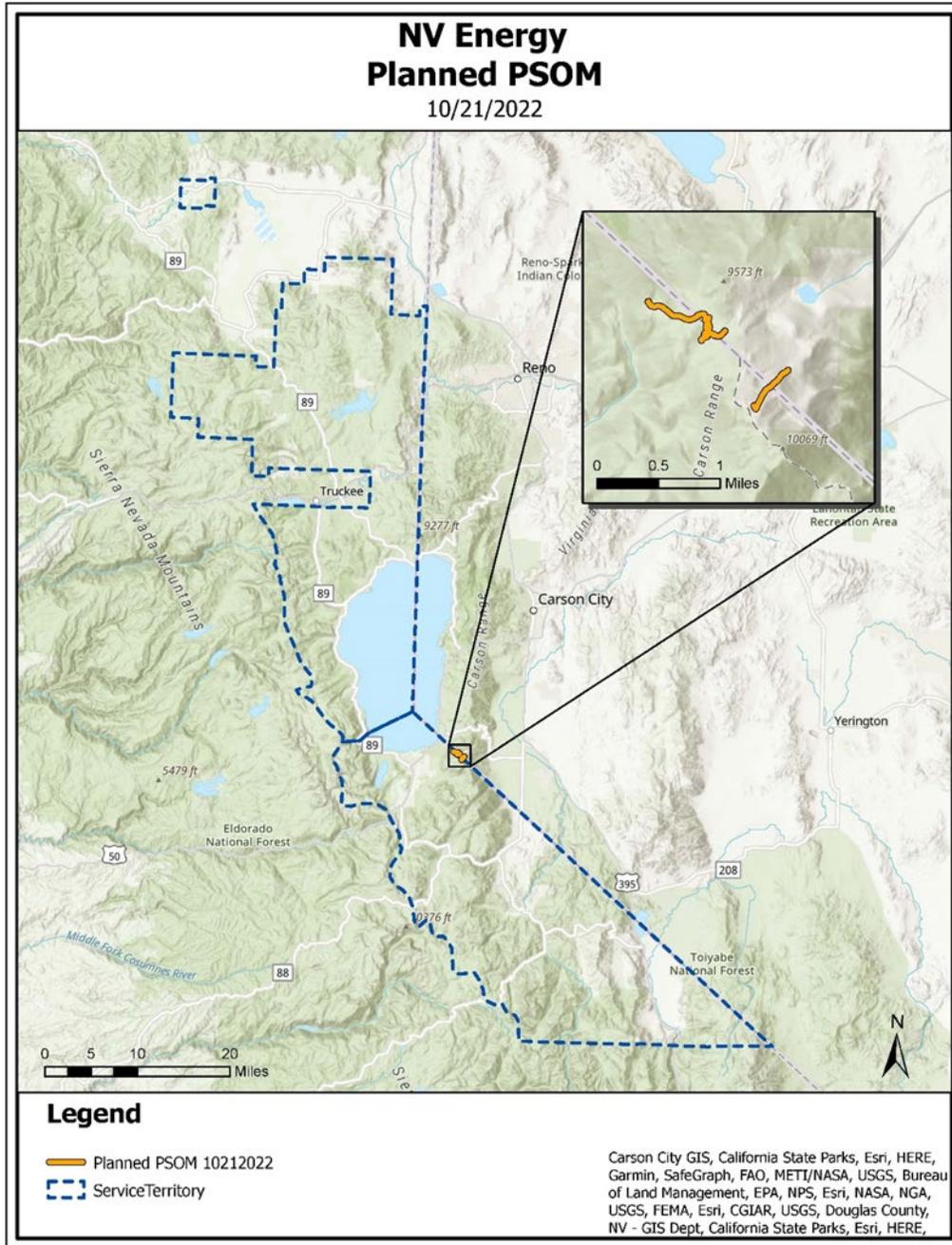
### 3 Description of the Event

On October 19, 2022 at 6:14 p.m., NV Energy notified Liberty that it was monitoring a potential PSOM event starting between 9:00 p.m. on October 21, 2022 and 1:00 a.m. on October 22, 2022 and ending at 3:00 p.m. on October 22, 2022. NV Energy's PSOM event being monitored could have potentially impacted one Liberty customer in Liberty's service territory. The map below depicts the Liberty area in El Dorado County that would have been impacted if NV Energy had executed its potential PSOM event. Liberty notified the potentially impacted customer on October 20, 2022 at 11:30 a.m., and, on October 21, 2022 at 1:20 p.m., NV Energy determined that its PSOM event was ultimately not required.

#### 3.1 De-Energization Event Summary

Figure 3-1 shows the location of the NV Energy's potential PSOM event on October 21, 2022.

Figure 3-1: Map of Potentially De-energized Liberty Area, October 21, 2022 NV Energy Potential PSOM Event



### 3.2 Potential Customer Impact

Table 3-1 lists down the potential customer impact at the circuit level for NV Energy's potential PSOM event on October 21, 2022. Ultimately, no Liberty customers were impacted because there was no NV Energy de-energization.

Liberty Utilities (CalPeco Electric) LLC Post Event Report on NV Energy's Potential PSOM Event

Table 3-1: Potential Liberty Customer Impact by Circuit of NV Energy Potential PSOM Event on October 21, 2022

<b>Circuit</b>	<b>Number of Liberty Customers Potentially Impacted</b>
Kingsbury 2800	1
<b>Total</b>	<b>1</b>

## 4 Damage and Hazards to Overhead Facilities

No damage or hazards to Liberty's system were observed for NV Energy's potential PSOM event on October 21, 2022.

## 5 Notifications

To the extent possible, Liberty will follow PSPS communications protocols if an NV Energy PSOM event impacts Liberty's power lines and customers. However, because Liberty does not have control over the execution of any NV Energy PSOM event, timing of notifications is dependent upon NV Energy's notifications to Liberty. During potential PSOM events, NV Energy communicates with Liberty as it would with a public safety partner. Thus, while NV Energy endeavors to notify Liberty of NV Energy's potential PSOM events as soon as NV Energy can, that notification may not arrive in time for conformance to Liberty's established communications protocols for Liberty's own PSPS events. Moreover, NV Energy is not subject to Resolution ESRB-8 and other California guidelines, rules, and regulations, so NV Energy may not operate on a notification schedule that synchronizes with Liberty's PSPS communications protocols. For NV Energy's potential PSOM event on October 21, 2022, NV Energy notified Liberty per the following timeline:<sup>2</sup>

- October 19, 2022 at 6:14 p.m.: NV Energy Report 1 – PSOM monitoring
- October 20, 2022 at 1:41 p.m.: NV Energy Report 2 – PSOM watch
- October 21, 2022 at 1:16 p.m.: NV Energy Report 3 – PSOM watch
- October 22, 2022 at 4:19 a.m.: NV Energy Report 4 – Cancelled PSOM

The following section describes the notifications, including content and timing, made subsequent to NV Energy's notification to Liberty that NV Energy was considering a PSOM event.

### 5.1 A description of all notices made, including notification to regulators, government agencies, public safety partners, local/tribal governments, and all customers.

#### 5.1.1 California Public Utilities Commission

Liberty notified the CPUC via email of NV Energy's October 21, 2022 potential PSOM event on October 21, 2022 at 5:30 p.m. and of NV Energy's decision not to de-energize on October 22, 2022 at 9:18 a.m. See Appendix C – Liberty Notifications to CPUC.

#### 5.1.2 State Warning Center

Liberty notified the State Warning Center via the Cal OES form on October 21, 2022 at 3:54 p.m. regarding NV Energy's October 21, 2022 potential PSOM event and potential de-energization of one Liberty customer. A subsequent call was made to the California State Warning Center to confirm that they received the notification.

#### 5.1.3 Community Based Organizations, Public Safety Partners, Tribal Communities and Critical Facilities (including telecommunication providers)

Not applicable.

#### 5.1.4 Customer Notifications

Liberty notified the one potentially impacted Liberty customer on October 20, 2022 at 11:30 a.m. and on October 21, 2022 at 1:20 p.m. regarding NV Energy's October 21, 2022 potential PSOM event.

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<sup>2</sup> Appendix B - NV Energy Notifications to Liberty of Potential PSOM Event

# Liberty Utilities (CalPeco Electric) LLC Post Event Report on NV Energy’s Potential PSOM Event

## 5.2 Notification Timeline

Table 5-1 summarizes the timeline of notifications regarding NV Energy’s potential PSOM event on October 21, 2022.

Table 5-1: Notification Timeline regarding NV Energy’s potential PSOM event on October 21, 2022

Date	Time	Recipient	Topic
10/20/2022	11:30 a.m.	All impacted Liberty customers (Heavenly Mountain Resort)	Notification of Possible NV Energy PSOM
10/21/2022	1:20 p.m.	All impacted Liberty customers (Heavenly Mountain Resort)	Follow-up Notification of Possible NV Energy PSOM
10/21/2022	3:54 p.m.	Cal OES	Notification of Possible NV Energy PSOM
10/21/2022	5:30 p.m.	CPUC	Notification of Possible NV Energy PSOM
10/22/2022	4:50 a.m. (resubmitted at 6:25 a.m.)	Cal OES	Notification of Cancelled NV Energy PSOM
10/22/2022	9:18 a.m.	CPUC	Notification of Cancelled NV Energy PSOM

## 5.3 Positive Customer Notifications

Not applicable. There were no Liberty Medical Baseline Customers (“MBL”) potentially impacted by NV Energy’s potential PSOM event on October 21, 2022.

## 5.4 Deviations from Notification Plans or Requirements (D.21-06-014)

Not applicable.

## 5.5 Plans for Correction in the Future (D.21-06-014)

Liberty does not have additional plans for correction based on NV Energy’s potential PSOM event on October 21, 2022.

## 5.6 False Communication

Liberty did not experience any false notifications during NV Energy’s potential PSOM event on October 21, 2022.

## 6 Local and State Public Safety Partner Engagement

Throughout the year, Liberty engages local and safety public safety partners to understand local needs, establish communication channels, and plan for events through tabletop and desktop exercises. Specifically, Liberty has cooperated and shared best practices with NV Energy in the following ways:

- Outline communication timelines between NV Energy and Liberty during a possible PSOM event that would impact Liberty's electric system;<sup>3</sup>
- NV Energy conducted a PSOM exercise during the timeframe of 4/29/22 – 5/5/2022. Liberty received notifications throughout the exercise and participated as an exercise observer.

Outside CPUC and Cal OES notifications, Liberty did not engage with local and state public safety partners during NV Energy's potential PSOM event on October 21, 2022.

### 6.1 Description of engagement

Not applicable.

6.2 List the names of all entities invited to the utility's Emergency Operations Center for a PSPS event, the method used to make this invitation, and whether a different form of communication was preferred by any entity invited to the utility's emergency operation center. (D.21-06-014)

Not applicable.

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<sup>3</sup> Appendix D – NV Energy Notification Outline

## 7 Complaints and Claims

As of November 21, 2022, Liberty has received no formal customer complaints or claims related to NV Energy's potential PSOM event on October 21, 2022.

## 8 Power Restoration

Not applicable.

## 9 Community Resource Centers

Due to the limited size and impact of NV Energy's potential PSOM event on October 21, 2022, Liberty did not plan to make community resource centers (CRCs) available during the event.

### 9.1 Location and hours of CRCs

Not applicable.

### 9.2 Any deviations and explanations from the CRC requirements including operation hours, ADA accessibility and equipment. (D.20-05-051)

Not applicable.

## 10 Mitigations to Reduce Impact to Customers

As described in Section 5, Liberty notified the one impacted Liberty customer that NV Energy was considering a PSOM event that could impact their service.

## 11 Lessons Learned from this Event

The following section describes, at a high level, any lessons learned or observations from NV Energy's potential PSOM event on October 21, 2022.

1. Liberty plans to continue discussions with the CPUC on the issue of post-PSOM reporting, as there remains no established authority on how Liberty should proceed in these instances. Simply assigning all PSPS post-reporting requirements to an event over which Liberty has no control is neither reasonable nor practically feasible. Liberty looks forward to working collaboratively with the CPUC to develop a process that takes into consideration Liberty's lack of decision-making and control over NV Energy's PSOM events yet still supports customer awareness, safety, and furtherance of CPUC objectives.
2. Liberty will add additional personnel with access to the OES portal and train them in portal submission procedures.
3. Liberty will call the CSWC to confirm receipt of the cancellation of the PSOM without de-energization.

## 12 Other Relevant Information

Liberty does not have any other relevant information to share at this time.

### 13 Officer Verification

I am an officer of the applicant corporation herein and am authorized to make this verification on its behalf. I am informed and believe that the matters stated in this foregoing document are true.

I declare under penalty of perjury that the foregoing is true and correct. Executed on this 21<sup>st</sup> of November, 2022 in Downey, California.

A handwritten signature in cursive script that reads "Edward Jackson".

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**Edward Jackson**  
**President, California**

14 Appendix A – CPUC Email Response from November 4, 2022

**From:** [Yergovich, Matthew](#)  
**To:** [Sharon Yang](#)  
**Cc:** [Jordan Parrillo](#); [Dan Marsh](#); [Eliot Jones](#); [Lee Kiolbasa](#); [Noll, Anthony](#); [Dunton, Drucilla "Dru"](#)  
**Subject:** RE: [EXTERNAL] Follow-up on Potential NV Energy PSOM Event from 10/21/2022  
**Date:** Friday, November 4, 2022 12:35:32 PM

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Sharon,

Our responses are highlighted below:

1. Is it the CPUC's contention that it is a utility's obligation to report on an event over which it has no ownership or control? What CPUC decisions or other authority support this position? Please cite specific language, so we may follow accordingly.

The first sentence of Resolution ESRB-8 states that the de-energization reasonableness, public notification, mitigation and reporting requirements are extended to all electric IOUs. The first sentence of D.19-05-042 establishes that the decision adopts de-energization (Public Safety Power Shut-off or PSPS) communication and notification guidelines for all electric IOUs along with enumerated updates. The Phase 2 (D.20-05-051), 3 (D.21-06-034) and other PSPS decisions similarly apply to such proactive power shutoffs. All these guidelines are rooted in the IOU's safety obligations stemming from PUC section 451 and 399.2(a).

We acknowledge there are assumptions throughout these regulations that the IOU was involved in deenergizing its lines. However, the post-event reporting informs the Commission about such decisionmaking. Liberty indicated that it coordinated with Nevada Energy (NVE) regarding some aspects of these proactive safety deenergization event(s) (that we understand NVE calls "PSOM" and the Commission calls "PSPS") and therefore was involved with such event(s). Liberty's post event reporting should include details about such coordination. For example, did Liberty receive notice from NVE about such deenergization; has Liberty demanded/required the same? Has Liberty alerted NVE to any factors that might affect the deenergization decisionmaking, like affected customer information or line risks/non-risks? Does Liberty coordinate with NVE to honor the important themes established in the Commission's body of regulations including noticing, reporting and mitigation of deenergization effects?

Can Liberty please confirm our definition of "PSOM" is correct or provide the correct definition? This can be provided in the post event report.

2. If it is the CPUC's position that Liberty should submit a post-event report for this potential NV Energy PSOM event (and other future NV Energy PSOM events),
  - a. What information should Liberty include in the report? We have indicated below what Liberty is able to provide:
    - i. Executive Summary – Possible to provide
    - ii. Decision-Making Process – Not applicable. See above. We have questions about whether and to what extent Liberty provided or attempted

to provide important information to NVE to inform the deenergization decisionmaking.

- iii. Description of Event – Possible to provide
  - iv. Damage and Hazards to Overhead Facilities – Not applicable. This is applicable. Liberty should report as pertinent to Liberty's lines/facilities.
  - v. Notifications – Possible to provide
  - vi. Local and State Public Safety Partner Engagement – Possible to provide
  - vii. Complaints and Claims – Possible to provide
  - viii. Power Restoration – Possible to provide
  - ix. Community Resource Centers – Possible to provide
  - x. Mitigations to Reduce Customer Impact – Not applicable. This is applicable. We are curious about what efforts Liberty undertakes to mitigate/reduce customer impact.
  - xi. Lessons Learned from this Event – Possible to provide
- b. What should Liberty call this report, as it is not a PSPS post-event report? This is a public safety power shutoff event but it is unclear whether and to what extent Liberty coordinated with NVE in instituting the event on Liberty's lines. It is therefore a PSPS post event report.
  - c. Should this report be distributed to the R.18-02-005 service list? All PSPS distribution requirements should be met.
  - d. Should this report be included in any post-season reporting? All post-season reporting requirements should be met.
  - e. If an NV Energy PSOM event coincides with a Liberty PSPS event, is Liberty obligated to submit two post-event reports? Post event reporting is extremely fact specific but we encourage more reporting (two event reports) if there are any questions about whether these are separate events.
3. Again, as stated above—to the extent possible—Liberty will follow PSPS communications protocols if an NV Energy PSOM event impacts Liberty's power lines and customers. However, because Liberty does not have control over the execution of any NV Energy PSOM event, timing of notifications is dependent upon NV Energy's notifications to Liberty. During potential PSOM events, NV Energy communicates with Liberty as it would with a public safety partner. Thus, while NV Energy endeavors to notify Liberty of NV Energy's potential PSOM events as soon as NV Energy can, that notification may not arrive in time for conformance to Liberty's established communications protocols for its own PSPS events. Moreover, NV Energy is not subject to Resolution ESRB-8 and other California guidelines, rules, and regulations, so NV Energy may not operate on a notification schedule that synchronizes with Liberty's PSPS communications protocols. We look forward to learning more about Liberty's communication and coordination with NVE regarding these events.
4. During our call this morning, Matt argued that Liberty should insert itself into NV Energy's decision-making process for a PSOM event that could potentially impact the Liberty system. Is this the CPUC's position? Practically speaking, Liberty does not understand how it can adhere to this directive. As mentioned above, Liberty is the equivalent of a public safety partner who receives notification that NV Energy's PSOM event is being contemplated. Whether NV Energy decides to execute a PSOM event is at NV Energy's sole discretion; NV Energy alone decides what to do with its system. There are open questions about whether and to what extent

Liberty informs the ultimate deenergization decisionmaking involved in these events. The post event reporting will inform us about this.

5. Liberty respectfully requests an extension of 10 days from the CPUC's response to this email to submit any required post-event report for the October 21, 2022 potential NV Energy PSOM event. Yes, Liberty may have 10 business days from this email to submit post-event reporting for this event, that is, until the end of day on Monday, November 21<sup>st</sup>. Thank you for your ongoing communication and for working with us on this.

Thank you.

-Matt

Matthew S. Yergovich  
Staff Attorney  
State/Federal Advisory  
California Public Utilities Commission  
415-596-3474

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**From:** Sharon Yang <Sharon.Yang@libertyutilities.com>

**Sent:** Wednesday, November 2, 2022 11:06 PM

**To:** Noll, Anthony <Anthony.Noll@cpuc.ca.gov>; Dunton, Drucilla "Dru" <Drucilla.Dunton@cpuc.ca.gov>; Yergovich, Matthew <Matthew.Yergovich@cpuc.ca.gov>

**Cc:** Jordan Parrillo <Jordan.Parrillo@libertyutilities.com>; Dan Marsh <Dan.Marsh@libertyutilities.com>; Eliot Jones <Eliot.Jones@libertyutilities.com>; Lee Kiolbasa <Leonard.Kiolbasa@libertyutilities.com>

**Subject:** RE: [EXTERNAL] Follow-up on Potential NV Energy PSOM Event from 10/21/2022

**CAUTION:** This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Hi Dru, Tony, and Matt.

Thank you for speaking with us this morning about the October 21, 2022 potential NV Energy Public Safety Outage Management (PSOM) event and possible post-event reporting related to PSOMs generally. We reiterate that, to the extent possible, Liberty will follow PSPS communications protocols if an NV Energy PSOM event impacts Liberty's power lines and customers. Liberty takes any event that impacts our customers very seriously. We do not agree with Matt's characterization of our request for written authority and guidance on this matter and our clarity-seeking questions as "shrugging our shoulders." To the contrary, our line of inquiry demonstrates our concern about customer awareness, safety, and compliance with CPUC objectives.

The CPUC's guidelines do not appear to contemplate the situation at hand. In this absence of explicit

standards regarding a PSOM event executed by a non-California third party, Liberty wishes to understand what the CPUC expects from us and how we should handle the instant matter and others like it going forward.

Dru asked that we put our questions in an email. They are as follows:

1. Is it the CPUC's contention that it is a utility's obligation to report on an event over which it has no ownership or control? What CPUC decisions or other authority support this position? Please cite specific language, so we may follow accordingly.
2. If it is the CPUC's position that Liberty should submit a post-event report for this potential NV Energy PSOM event (and other future NV Energy PSOM events),
  - a. What information should Liberty include in the report? We have indicated below what Liberty is able to provide:
    - i. Executive Summary – Possible to provide
    - ii. Decision-Making Process – Not applicable
    - iii. Description of Event – Possible to provide
    - iv. Damage and Hazards to Overhead Facilities – Not applicable
    - v. Notifications – Possible to provide
    - vi. Local and State Public Safety Partner Engagement – Possible to provide
    - vii. Complaints and Claims – Possible to provide
    - viii. Power Restoration – Possible to provide
    - ix. Community Resource Centers – Possible to provide
    - x. Mitigations to Reduce Customer Impact – Not applicable
    - xi. Lessons Learned from this Event – Possible to provide
  - b. What should Liberty call this report, as it is not a PSPS post-event report?
  - c. Should this report be distributed to the R.18-02-005 service list?
  - d. Should this report be included in any post-season reporting?
  - e. If an NV Energy PSOM event coincides with a Liberty PSPS event, is Liberty obligated to submit two post-event reports?
3. Again, as stated above—to the extent possible—Liberty will follow PSPS communications protocols if an NV Energy PSOM event impacts Liberty's power lines and customers. However, because Liberty does not have control over the execution of any NV Energy PSOM event, timing of notifications is dependent upon NV Energy's notifications to Liberty. During potential PSOM events, NV Energy communicates with Liberty as it would with a public safety partner. Thus, while NV Energy endeavors to notify Liberty of NV Energy's potential PSOM events as soon as NV Energy can, that notification may not arrive in time for conformance to Liberty's established communications protocols for its own PSPS events. Moreover, NV Energy is not subject to Resolution ESRB-8 and other California guidelines, rules, and regulations, so NV Energy may not operate on a notification schedule that synchronizes with Liberty's PSPS communications protocols.
4. During our call this morning, Matt argued that Liberty should insert itself into NV Energy's decision-making process for a PSOM event that could potentially impact the Liberty system. Is this the CPUC's position? Practically speaking, Liberty does not understand how it can adhere to this directive. As mentioned above, Liberty is the equivalent of a public safety partner who receives notification that NV Energy's PSOM event is being contemplated. Whether NV Energy

decides to execute a PSOM event is at NV Energy's sole discretion; NV Energy alone decides what to do with its system.

5. Liberty respectfully requests an extension of 10 days from the CPUC's response to this email to submit any required post-event report for the October 21, 2022 potential NV Energy PSOM event.

Thank you.

**Sharon Yang | Liberty Utilities (West Region) | Director of Legal Services**  
P: 562-805-2014 | C: 530-721-0888 | E: [Sharon.Yang@libertyutilities.com](mailto:Sharon.Yang@libertyutilities.com)

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**From:** Jordan Parrillo <[Jordan.Parrillo@libertyutilities.com](mailto:Jordan.Parrillo@libertyutilities.com)>

**Sent:** Friday, October 28, 2022 3:56 PM

**To:** Noll, Anthony <[Anthony.Noll@cpuc.ca.gov](mailto:Anthony.Noll@cpuc.ca.gov)>; Dunton, Drucilla "Dru" <[Drucilla.Dunton@cpuc.ca.gov](mailto:Drucilla.Dunton@cpuc.ca.gov)>

**Cc:** Dan Marsh <[Dan.Marsh@libertyutilities.com](mailto:Dan.Marsh@libertyutilities.com)>; Sharon Yang <[Sharon.Yang@libertyutilities.com](mailto:Sharon.Yang@libertyutilities.com)>; Eliot Jones <[Eliot.Jones@libertyutilities.com](mailto:Eliot.Jones@libertyutilities.com)>; Lee Kiolbasa <[Leonard.Kiolbasa@libertyutilities.com](mailto:Leonard.Kiolbasa@libertyutilities.com)>; Yergovich, Matthew <[Matthew.Yergovich@cpuc.ca.gov](mailto:Matthew.Yergovich@cpuc.ca.gov)>

**Subject:** RE: [EXTERNAL] Follow-up on Potential NV Energy PSOM Event from 10/21/2022

Hi Tony,

We would like to discuss this matter further to gain clarification, as there are no reporting requirements for PSOM events. PSOM events are not PSPS events. PSOM events are not controlled by Liberty, regardless of the underlying intent of such events. PSOM events are always executed at NV Energy's discretion, not Liberty's, and Liberty has no involvement with NV Energy's decision-making.

We would like to know if it is the CPUC's contention that it is a utility's obligation to report on an event over which it has no ownership and what decisions support this position.

Thanks,  
Jordan

**Jordan Parrillo | Liberty Utilities (California) | Manager, Regulatory Affairs**  
P: 530-721-7818 | C: 609-610-4198 | E: [Jordan.Parrillo@libertyutilities.com](mailto:Jordan.Parrillo@libertyutilities.com)

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**From:** Noll, Anthony <[Anthony.Noll@cpuc.ca.gov](mailto:Anthony.Noll@cpuc.ca.gov)>

**Sent:** Thursday, October 27, 2022 2:42 PM

**To:** Jordan Parrillo <[Jordan.Parrillo@libertyutilities.com](mailto:Jordan.Parrillo@libertyutilities.com)>; Dunton, Drucilla "Dru" <[Drucilla.Dunton@cpuc.ca.gov](mailto:Drucilla.Dunton@cpuc.ca.gov)>

**Cc:** Dan Marsh <[Dan.Marsh@libertyutilities.com](mailto:Dan.Marsh@libertyutilities.com)>; Sharon Yang <[Sharon.Yang@libertyutilities.com](mailto:Sharon.Yang@libertyutilities.com)>; Eliot Jones <[Eliot.Jones@libertyutilities.com](mailto:Eliot.Jones@libertyutilities.com)>; Lee Kiolbasa <[Leonard.Kiolbasa@libertyutilities.com](mailto:Leonard.Kiolbasa@libertyutilities.com)>; Yergovich, Matthew <[Matthew.Yergovich@cpuc.ca.gov](mailto:Matthew.Yergovich@cpuc.ca.gov)>

**Subject:** RE: [EXTERNAL] Follow-up on Potential NV Energy PSOM Event from 10/21/2022

Hi Jordan,

Both an NVE PSOM and PSPS are utility initiated pro-active de-energizations to prevent wildfires so while they have different names they are the same in intent and ultimate goal. As you point out that if NVE was wholly responsible for the deenergization decision making then such explanation should be provided in Liberty's reporting to the Commission and areas of the post event report that are outside of Liberty's knowledge should be noted.

I have added Matt Yergovich from our legal division if there more detailed questions of CPUC requirements. Happy to talk also if that helps.

Thanks,  
Tony

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**From:** Jordan Parrillo <[Jordan.Parrillo@libertyutilities.com](mailto:Jordan.Parrillo@libertyutilities.com)>

**Sent:** Thursday, October 27, 2022 1:20 PM

**To:** Noll, Anthony <[Anthony.Noll@cpuc.ca.gov](mailto:Anthony.Noll@cpuc.ca.gov)>; Dunton, Drucilla "Dru" <[Drucilla.Dunton@cpuc.ca.gov](mailto:Drucilla.Dunton@cpuc.ca.gov)>

**Cc:** Dan Marsh <[Dan.Marsh@libertyutilities.com](mailto:Dan.Marsh@libertyutilities.com)>; Sharon Yang <[Sharon.Yang@libertyutilities.com](mailto:Sharon.Yang@libertyutilities.com)>; Eliot Jones <[Eliot.Jones@libertyutilities.com](mailto:Eliot.Jones@libertyutilities.com)>; Lee Kiolbasa <[Leonard.Kiolbasa@libertyutilities.com](mailto:Leonard.Kiolbasa@libertyutilities.com)>

**Subject:** [EXTERNAL] Follow-up on Potential NV Energy PSOM Event from 10/21/2022

**CAUTION:** This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Hi Tony,

I have called and left voicemails for both you and Dru. I'm following up regarding your previous guidance on October 21, 2022 related to a potential NV Energy Public Safety Outage Management (PSOM) event, which did not ultimately occur, as communicated to the CPUC and notified through the Cal OES notification portal.

During the NV Energy PSOM watch, you suggested that Liberty treat this as a small scale PSPS, including state notifications, customer communication, and post-event reporting. Liberty requests that the CPUC provide the regulatory requirements related to your guidance. Specifically, Liberty is not aware of any CPUC decisions or regulatory requirements to submit a PSPS post-event report for an NV Energy PSOM event or watch.

To be clear, an NV Energy PSOM event is not a PSPS. The execution of a PSOM event is determined solely by NV Energy, not by Liberty. To the extent possible, Liberty will follow its communication protocols if an NV Energy PSOM event impacts Liberty's power lines and customers. However, for any NV Energy PSOM event, Liberty does not have access to much of the required information for a PSPS post-event report (e.g., decision-making process, fuel conditions, weather conditions, alternatives considered, NV Energy engagement with public safety partners, etc.) and does not have a means to compel this information from NV Energy, the utility in control of the decision and the

event.

Please feel free to give me a call at 530.721.7818 if you have time to discuss.

Thanks,  
Jordan

**Jordan Parrillo** | [Liberty Utilities \(California\)](#) | Manager, Regulatory Affairs  
P: 530-721-7818 | C: 609-610-4198 | E: [Jordan.Parrillo@libertyutilities.com](mailto:Jordan.Parrillo@libertyutilities.com)

## 15 Appendix B – NV Energy Notifications to Liberty of Potential PSOM Event



NV Energy Public Safety Outage Management (PSOM)  
Notification Form

Report Date	<b>October 19, 2022</b>	Report Time	<b>17:30 Hours</b>
Report Number	<b>PSOM- 2022 - N - Report # 1</b>		

Notification Type			
De-Energization Potential (192 hours)	<b>X</b>	De-Energization Potential (96 Hours)	
Decision to De-Energize (48 hours)		De-Energization Initiated	
Initiated Assessment to Re-Energize		All Lines Re-Energized	
De-Energization Event Cancelled			
Is this an update notification?			
	Yes	No	<b>X</b>
If "yes", provide an update number:			

Maps of impacted areas:	<a href="https://www.nvenergy.com/safety/psom">https://www.nvenergy.com/safety/psom</a>
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**Potential Impact**

County	Location	Zone	# of Customers	Estimated De-energization Time	Actual Time of De-energization	Estimated Time of Re-energization
<b>Carson City/Douglas County</b>	<b>Glenbrook</b>	<b>Glenbrook</b>	<b>1,148</b>	<b>Between 2100 on Oct. 21 and 0100 on Oct. 22</b>	<b>TBD</b>	<b>Oct. 22, 2022, approx. 1500</b>
<b>Douglas County</b>	<b>Stateline</b>	<b>Heavenly</b>	<b>2</b>	<b>Between 2100 on Oct. 21 and 0100 on Oct. 22</b>	<b>TBD</b>	<b>Oct. 22, 2022, approx. 1500</b>
Total Number of Customers:			<b>1,150</b>			
Number of Green Cross Customers:			<b>2</b>			
Projected end date of event:			<b>October 22, 2022 approx.. 1500 hours</b>			

List of impacted Critical Infrastructure: (including, but not limited to, hospitals, fire stations, police stations, water treatment facilities, schools, communications facilities etc.)

County	Location(s)/ Description of Infrastructure	Estimated Time of Restoration
Douglas/Glenbrook PDZ	At&T Wireless Unit	See Above
Douglas/Glenbrook PDZ	Douglas County-Public Works	See Above

Douglas/Glenbrook PDZ	Tahoe Douglas Fire District	See Above
Douglas/Glenbrook PDZ	T-Mobile West Corporation	See Above
Douglas/Glenbrook PDZ	Zephyr Cove Elementary School	See Above
Douglas/Glenbrook PDZ	George Whittell High School	See Above
Douglas/Glenbrook PDZ	Douglas County-Public Works	See Above
Douglas/Glenbrook PDZ	Verizon Wireless	See Above

## Public/ Customer Notification Information and Report

Proposed Public Notification Language (List by Customer Type)			
<ul style="list-style-type: none"> <li>• High winds are being forecast for the Glenbrook and Heavenly PSOM zones this weekend.</li> <li>• Based on current weather trends, we are Monitoring for a potential Public Safety Outage event.</li> <li>• This outage will impact approximately 1,150 customers.</li> <li>• The PSOM event is possible starting between 2100 on Oct. 21 and 0100 on Oct. 22 and lasting until Sunday, October 23 at 1500. <ul style="list-style-type: none"> <li>○ This timeframe includes the duration of the weather event and the time it will take NV Energy crews to make repairs to the damaged equipment and inspect lines and other equipment for damage, vegetation, or debris to safely restore power.</li> </ul> </li> <li>• During a PSOM event, power is shut off for safety to help prevent power lines, or debris blowing into power lines, and other equipment from causing a wildfire when certain environmental conditions are met.</li> <li>• Safety is NV Energy's highest priority. PSOM is a key measure of defense to help protect the community and environment from wildfires.</li> <li>• Factors that contribute to a PSOM event include weather conditions, vegetation levels that can be used as fuel for a fire, field observations, guidance from local fire departments and other first responders.</li> <li>• We continue to monitor the fire weather conditions and will provide regular updates regarding the outage event.</li> <li>• Based on experience, wind conditions have escalated quickly without notice.</li> <li>• The PSOM event may be cancelled if weather conditions change.</li> <li>• NV Energy will provide advance notice to Green Cross customer in the area and will offer them generators or hotel accommodations during the PSOM event.</li> <li>• There is one Green Cross customer in the Glenbrook PSOM Zone and none in the Heavenly PSOM Zone.</li> <li>• Additional information including PSOM updates, PSOM criteria, preparedness information and PSOM Zone maps can be found at <a href="http://nvenergy.com/PSOM">nvenergy.com/PSOM</a>.</li> </ul>			
Method of Public Notification (Check All That Apply)			
Automated Notification System: SMS/ Text Message	X	Automated Notification System: Voice Message/ Phone	X
Automated Notification System: E-mail	X	Personnel Phone Call	X
Media Outreach	X	Social Media	X
Stakeholder Coordination:	X	Local Government Coordination	X

Other – Please Specify:

Entities to be Notified – including Key Customers and Stakeholders

**Disclaimer**

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NV Energy Public Safety Outage Management (PSOM)  
Notification Form

Report Date	<b>October 20, 2022</b>	Report Time	<b>13:00 Hours</b>
Report Number	<b>PSOM- 2022 – North Event 7 - Report 2</b>		

Notification Type			
De-Energization Potential (192 hours)		De-Energization Potential (96 Hours)	<b>X</b>
Decision to De-Energize (48 hours)		De-Energization Initiated	
Initiated Assessment to Re-Energize		All Lines Re-Energized	
De-Energization Event Cancelled			
Is this an update notification?			
	Yes	<b>X</b>	No
If "yes", provide an update number:			

Maps of impacted areas:	<a href="https://www.nvenergy.com/safety/psom">https://www.nvenergy.com/safety/psom</a>
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**Potential Impact**

County	Zone	Sub-Zone	# of Customers	Estimated De-energization Time	Actual Time of De-energization	Estimated Time of Re-energization
Carson City/Douglas County	Glenbrook	Glenbrook East - Spooner	1,229	Between 2100 on Oct. 21 and 0100 on Oct. 22	TBD	Oct. 22, 2022, approx. 1500
Douglas County	Heavenly	Heavenly	8	Between 2100 on Oct. 21 and 0100 on Oct. 22	TBD	Oct. 22, 2022, approx. 1500
Douglas / Carson	Carson - Genoa	South Carson City - Clear Creek	581	Between 2100 on Oct. 21 and 0100 on Oct. 22	TBD	Oct. 22, 2022, approx. 1500
Douglas / Carson	Stateline (formerly Roundhill)	Upper Kingsbury ONLY	1,500	Between 2100 on Oct. 21 and 0100 on Oct. 22	TBD	Oct. 22, 2022, approx. 1500
Total Number of Customers:			1,150			
Number of Green Cross Customers:			2			
Projected end date of event:			October 22, 2022 approx. 1500 hours			

List of impacted Critical Infrastructure: (including, but not limited to, hospitals, fire stations, police stations, water treatment facilities, schools, communications facilities etc.)

County	Location(s)/ Description of Infrastructure	Estimated Time of Restoration
Douglas/Glenbrook PDZ	At&T Wireless Unit	See Above
Douglas/Glenbrook PDZ	Douglas County-Public Works	See Above
Douglas/Glenbrook PDZ	Tahoe Douglas Fire District	See Above
Douglas/Glenbrook PDZ	T-Mobile West Corporation	See Above
Douglas/Glenbrook PDZ	Zephyr Cove Elementary School	See Above
Douglas/Glenbrook PDZ	George Whittell High School	See Above
Douglas/Glenbrook PDZ	Douglas County-Public Works	See Above
Douglas/Glenbrook PDZ	Verizon Wireless	See Above

### Public/ Customer Notification Information and Report

Proposed Public Notification Language (List by Customer Type)
<p><b>PSOM Watch Northern Nevada – October 20, 2022</b></p> <ul style="list-style-type: none"> <li>• Based on current fire weather forecasts that include high winds and dry conditions for some parts of the Lake Tahoe area, a Public Safety Outage Management (PSOM) WATCH is in effect for the following PSOM Zones <b>only</b>: <ul style="list-style-type: none"> <li>○ <a href="#">Heavenly</a> (8 customers)</li> <li>○ <a href="#">Glenbrook</a> (1,229 customers)</li> <li>○ <a href="#">Carson-Genoa</a> (581 customers)</li> </ul> </li> <li>• <a href="#">Stateline</a> – Upper Kingsbury area <b>only</b> (1,500 customers) <ul style="list-style-type: none"> <li>○ This means a PSOM event is possible starting sometime between 9 p.m. on Friday, October 21 and 1 a.m. on Saturday, October 22 and lasting until Saturday, October 22 at 3 p.m.</li> <li>○ This timeframe includes the duration of the weather event and the time it will take NV Energy crews to inspect lines and other equipment for damage, vegetation, or debris in order to safely restore power.</li> </ul> </li> <li>• Customers who are affected by the PSOM WATCH will receive a call, text and/or email.</li> <li>○ Customers are encouraged to prepare a safety plan. Preparation tips are available at <a href="http://nvenergy.com/psom">nvenergy.com/psom</a></li> <li>• Safety is NV Energy’s highest priority. PSOM is a key measure of defense to help protect the community and environment from wildfires.</li> <li>• During a PSOM event, power is shut off for safety to help prevent power lines, or debris blowing into power lines, and other equipment from causing a wildfire when certain environmental conditions are met.</li> <li>• Factors that contribute to a PSOM event include weather conditions, vegetation levels that can be used as fuel for a fire, field observations, guidance from local fire departments and other first responders.</li> <li>• We continue to monitor the fire weather conditions and will provide regular updates to impacted customers regarding the status of the PSOM outage event.</li> <li>• Based on the scope/location of the actual weather event, NV Energy may only shut off power to parts of a PSOM Zone.</li> <li>• The PSOM WATCH may be cancelled if weather conditions change.</li> <li>○ Customer Resource Centers (CRC) will be open during the outage event from 9 a.m. to 6 p.m. or until power is restored at: Whittell High School, 240 Warrior Way, Zephyr Cove, NV 89448</li> <li>• The CRC will offer charging devices, light snacks, water, and outage updates.</li> </ul>

- NV Energy is working to provide notice to its Green Cross customers in the area and has offered them hotel accommodations if a PSOM event is initiated.
- Additional information including PSOM updates, PSOM criteria, preparedness information and PSOM Zone maps can be found at [nvenergy.com/PSOM](http://nvenergy.com/PSOM).

**Method of Public Notification (Check All That Apply)**

Automated Notification System: SMS/ Text Message	X	Automated Notification System: Voice Message/ Phone	X
Automated Notification System: E-mail	X	Personnel Phone Call	X
Media Outreach	X	Social Media	X
Stakeholder Coordination:	X	Local Government Coordination	X

Other – Please Specify:

**Entities to be Notified – including Key Customers and Stakeholders**

**Disclaimer**

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NV Energy Public Safety Outage Management (PSOM)  
Notification Form

Report Date	<b>October 21, 2022</b>	Report Time	<b>13:00 Hours</b>
Report Number	<b>PSOM- 2022 – North Event 7 - Report 3</b>		

Notification Type			
De-Energization Potential (192 hours)		De-Energization Potential (96 Hours)	
Decision to De-Energize (48 hours)	X	De-Energization Initiated	
Initiated Assessment to Re-Energize		All Lines Re-Energized	
De-Energization Event Cancelled			
Is this an update notification?			
Yes	X	No	
If "yes", provide an update number:		<b>3</b>	
Maps of impacted areas:		<a href="https://www.nvenergy.com/safety/psom">https://www.nvenergy.com/safety/psom</a>	

**Potential Impact**

County	Zone	Sub-Zone	# of Customers/ GCC / Major	Estimated De-energization Time	Actual Time of De-energization	Estimated Time of Re-energization
Carson City/Douglas County	Glenbrook	Glenbrook East - Spooner (2600)	75 / 0 / 0	Between 2100 on Oct. 21 & 0100 on Oct. 22	TBD	Oct. 22, 2022, approx. 1500
Douglas County	Heavenly	Kingsbury 2800	2 / 0 / 1	Between 2100 on Oct. 21 & 0100 on Oct. 22	TBD	Oct. 22, 2022, approx. 1500
Douglas / Carson	Carson - Genoa	South Carson City - Clear Creek (Curry St 1280)	14 / 0 / 0	Between 2100 on Oct. 21 & 0100 on Oct. 22	TBD	Oct. 22, 2022, approx. 1500
Douglas / Carson	Stateline (formerly Roundhill)	Upper Kingsbury ONLY (Roundhill 1502 sec. 5-9)	1510 / 0 / 0	Between 2100 on Oct. 21 & 0100 on Oct. 22	TBD	Oct. 22, 2022, approx. 1500
Washoe	Incline	Mt Rose 4200 OH Only	1 / 0 / 0	Between 2100 on Oct. 21 & 0100 on Oct. 22	TBD	Oct. 22, 2022, approx. 1500
Total Number of Customers:			1,602			
Number of Green Cross Customers:			0			
Major Accounts			1			
Projected end date of event:			October 22, 2022 approx. 1500 hours			

List of impacted Critical Infrastructure: (including, but not limited to, hospitals, fire stations, police stations, water treatment facilities, schools, communications facilities etc.)

County	Location(s)/ Description of Infrastructure	Estimated Time of Restoration
	Currently being updated, will send as soon as available.	

### Public/ Customer Notification Information and Report

Proposed Public Notification Language (List by Customer Type)
<p>Based on updated fire weather forecasts that include high winds and dry conditions for parts of Lake Tahoe, a Public Safety Outage Management (PSOM) WARNING is in effect for the <b>ridgeline areas of the following PSOM Zones only:</b></p> <ul style="list-style-type: none"> <li>○ <a href="#">Heavenly</a> (2 customers)</li> <li>○ <a href="#">Glenbrook</a> – Spooner area <b>only</b> (76 customers)</li> <li>○ <a href="#">Carson-Genoa</a> – South Carson City/Clear Creek area <b>only</b> (14 customers)</li> <li>○ <a href="#">Stateline</a> – Upper Kingsbury area <b>only</b> (1,505 customers)</li> <li>● <a href="#">Incline</a> – Mt. Rose area only (1 customer)</li> </ul> <p><b>The PSOM WATCH has been cancelled for the customers in the above zones who are not in the impacted areas.</b></p> <p>This means a PSOM event is possible starting sometime between 9 p.m. on Friday, October 21 and 1 a.m. on Saturday, October 22 and lasting until Saturday, October 22 at 3 p.m.</p> <p>This timeframe includes the duration of the weather event and the time it will take NV Energy crews to inspect lines and other equipment for damage, vegetation or debris in order to safely restore power. Customers who are affected by the PSOM WARNING will receive a call, text and/or email. Customer who are in an area where the PSOM WATCH has been cancelled will receive a call, text and/or email.</p> <p>Customers are encouraged to prepare a safety plan.</p> <p>Preparation tips are available at <a href="http://nvenergy.com/psom">nvenergy.com/psom</a></p> <p>Safety is NV Energy’s highest priority. PSOM is a key measure of defense to help protect the community and environment from wildfires.</p> <p>During a PSOM event, power is shut off for safety in order to help prevent power lines, or debris blowing into power lines, and other equipment from causing a wildfire when certain environmental conditions are met.</p> <p>Factors that contribute to a PSOM event include weather conditions, vegetation levels that can be used as fuel for a fire, field observations, guidance from local fire departments and other first responders.</p> <p>We continue to monitor the fire weather conditions and will provide regular updates to impacted customers regarding the status of the PSOM outage event.</p> <p>Based on the scope/location of the actual weather event, NV Energy may only shut off power to parts of a PSOM Zone.</p> <p>The PSOM WARNING may be cancelled if weather conditions change.</p> <p>Customer Resource Centers (CRC) will be open during the outage event from 9 a.m. to 6 p.m. or until power is restored at:</p> <ul style="list-style-type: none"> <li>○ Whittell High School, 240 Warrior Way, Zephyr Cove, NV 89448</li> </ul> <p>The CRC will offer charging devices, light snacks, water and outage updates.</p> <p>NV Energy is working to provide notice to its Green Cross customers in the area and has offered them hotel accommodations if a PSOM event is initiated.</p> <p>Additional information including PSOM updates, PSOM criteria, preparedness information and PSOM Zone maps can be found at <a href="http://nvenergy.com/PSOM">nvenergy.com/PSOM</a>.</p>
Method of Public Notification (Check All That Apply)

Automated Notification System: SMS/ Text Message	X	Automated Notification System: Voice Message/ Phone	X
Automated Notification System: E-mail	X	Personnel Phone Call	X
Media Outreach	X	Social Media	X
Stakeholder Coordination:	X	Local Government Coordination	X
Other – Please Specify:			
<b>Entities to be Notified – including Key Customers and Stakeholders</b>			

**Disclaimer**

*This document and the data included herein are intended for the sole use of the intended recipient(s). The above data is based on an assessment in wildfire risk tiers in NV Energy's service territory. NV Energy is not responsible for any missing data. Supporting data is collected by NV Energy personnel and its agents using several different data sources. Notwithstanding that, NV Energy makes no representations or warranties, express or implied, of the accuracy or completeness of the information herein. NV Energy is not liable for any use or reliance upon any of the information.*



NV Energy Public Safety Outage Management (PSOM)  
Notification Form

Report Date	<b>October 22, 2022</b>	Report Time	<b>0430 Hours</b>
Report Number	<b>PSOM- 2022 – North Event 7 - Report 4</b>		

Notification Type			
De-Energization Potential (192 hours)		De-Energization Potential (96 Hours)	
Decision to De-Energize (48 hours)		De-Energization Initiated	X
Initiated Assessment to Re-Energize		All Lines Re-Energized	
De-Energization Event Cancelled			
Is this an update notification?			
	Yes	X	No
If "yes", provide an update number:		4	
Maps of impacted areas:		<a href="https://www.nvenergy.com/safety/psom">https://www.nvenergy.com/safety/psom</a>	

**Potential Impact**

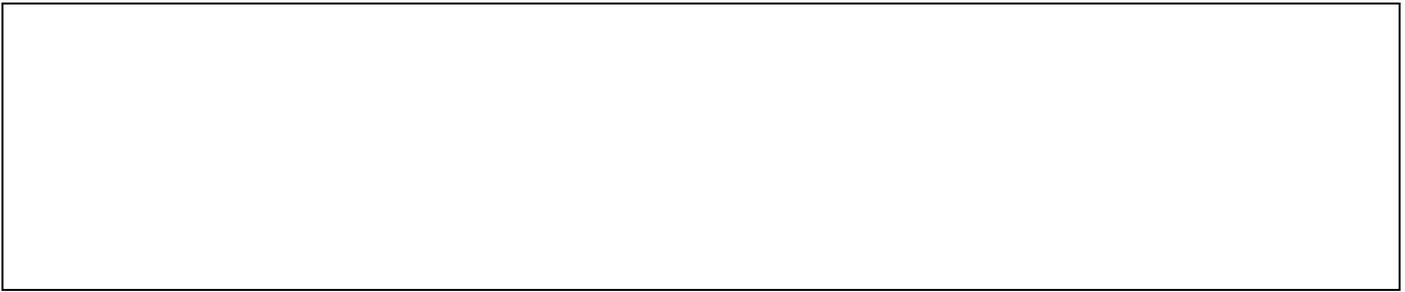
County	Zone	Sub-Zone	# of Customers/ GCC / Major	Estimated De-energization Time	Actual Time of De-energization	Estimated Time of Re-energization
Carson City/Douglas County	Glenbrook	Glenbrook East – Spooner (2600)	76 / 0 / 0	Between 2100 on Oct. 21 & 0100 on Oct. 22	Oct 22 0213	Oct. 22, 2022, Approx.. 1500
Douglas County	Heavenly	Kingsbury 2800	2 / 0 / 1	Between 2100 on Oct. 21 & 0100 on Oct. 22	CANCELLED	Oct. 22, 2022, Approx.. 1500
Douglas / Carson	Carson – Genoa	South Carson City – Clear Creek (Curry St 1280)	14 / 0 / 0	Between 2100 on Oct. 21 & 0100 on Oct. 22	Oct 22 0336	Oct. 22, 2022, Approx.. 1500
Douglas / Carson	Stateline (formerly Roundhill)	Upper Kingsbury ONLY (Roundhill 1502 sec. 5-9)	1510 / 0 / 0	Between 2100 on Oct. 21 & 0100 on Oct. 22	CANCELLED	Oct. 22, 2022, Approx.. 1500
Washoe	Incline	Mt Rose 4200 OH Only	1 / 0 / 0	Between 2100 on Oct. 21 & 0100 on Oct. 22	Oct 21 1015	Oct. 22, 2022, Approx.. 1500
Total Number of Customers:			4,602 91			
Number of Green Cross Customers:			0			
Major Accounts			4 0			
Projected end date of event:			October 22, 2022 approx. 1500 hours *See comment below			

List of impacted Critical Infrastructure: (including, but not limited to, hospitals, fire stations, police stations, water treatment facilities, schools, communications facilities etc.)

County	Location(s)/ Description of Infrastructure	Estimated Time of Restoration
	Currently being updated, will send as soon as available.	

### Public/ Customer Notification Information and Report

Proposed Public Notification Language (List by Customer Type)			
<p>Based on updated fire weather forecasts that include high winds and dry conditions for parts of Lake Tahoe, a Public Safety Outage Management (PSOM) is in effect for the <b>ridgeline areas of the following PSOM Zones only</b>:</p> <ul style="list-style-type: none"> <li>○ <a href="#">Glenbrook</a> – Spooner area <b>only</b> (76 customers)</li> <li>○ <a href="#">Carson-Genoa</a> – South Carson City/Clear Creek area <b>only</b> (14 customers)</li> <li>● <a href="#">Incline</a> – Mt. Rose area only (1 customer)</li> </ul> <p><b>The PSOM WATCH has been cancelled for the customers in the above zones who are not in the impacted areas. The PSOM is also cancelled for Stateline and Heavenly.</b></p> <p><i>Patrols are expected to start at 1000 (or sooner weather permitting) on the three de-energized segments. Original estimated time of restoration was 1500 but actual restoration may occur sooner due to reduced PSOM area.</i></p> <ul style="list-style-type: none"> <li>○ This timeframe includes the duration of the weather event and the time it will take NV Energy crews to inspect lines and other equipment for damage, vegetation or debris in order to safely restore power.</li> <li>● Customer Resource Centers (CRC) will be open during the outage event from 9 a.m. to 6 p.m. or until power is restored at: <ul style="list-style-type: none"> <li>○ Whittell High School, 240 Warrior Way, Zephyr Cove, NV 89448</li> </ul> </li> <li>● The CRC will offer charging devices, light snacks, water and outage updates.</li> <li>● NV Energy is working to provide notice to its Green Cross customers in the area and has offered them hotel accommodations if a PSOM event is initiated.</li> <li>● Additional information including PSOM updates, PSOM criteria, preparedness information and PSOM Zone maps can be found at <a href="http://nvenergy.com/PSOM">nvenergy.com/PSOM</a>.</li> </ul>			
Method of Public Notification (Check All That Apply)			
Automated Notification System: SMS/ Text Message	X	Automated Notification System: Voice Message/ Phone	X
Automated Notification System: E-mail	X	Personnel Phone Call	X
Media Outreach	X	Social Media	X
Stakeholder Coordination:	X	Local Government Coordination	X
Other – Please Specify:			
Entities to be Notified – including Key Customers and Stakeholders			



**Disclaimer**

*This document and the data included herein are intended for the sole use of the intended recipient(s). The above data is based on an assessment in wildfire risk tiers in NV Energy's service territory. NV Energy is not responsible for any missing data. Supporting data is collected by NV Energy personnel and its agents using several different data sources. Notwithstanding that, NV Energy makes no representations or warranties, express or implied, of the accuracy or completeness of the information herein. NV Energy is not liable for any use or reliance upon any of the information.*

## 16 Appendix C – Liberty Notifications to CPUC

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**From:** Dan Marsh  
**Sent:** Saturday, October 22, 2022 9:18 AM  
**To:** pspnotification@cpuc.ca.gov  
**Cc:** anthony.noll@cpuc.ca.gov; Dunton, Drucilla "Dru"; Lee Kiolbasa; Eliot Jones; Jordan Parrillo  
**Subject:** Update to NV Energy PSOM Event

The previously planned NV Energy PSOM event that would have impacted one Liberty customer did not occur, and NV Energy has informed Liberty that the event is cancelled and has no plans to de-energize at this time.

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**From:** Dan Marsh  
**Sent:** Friday, October 21, 2022 5:29:31 PM  
**To:** pspnotification@cpuc.ca.gov <pspnotification@cpuc.ca.gov>  
**Cc:** anthony.noll@cpuc.ca.gov <anthony.noll@cpuc.ca.gov>; Dunton, Drucilla "Dru" <Drucilla.Dunton@cpuc.ca.gov>; Lee Kiolbasa <Leonard.Kiolbasa@libertyutilities.com>; Eliot Jones <Eliot.Jones@libertyutilities.com>; Jordan Parrillo (Jordan.Parrillo@libertyutilities.com) <Jordan.Parrillo@libertyutilities.com>  
**Subject:** NV Energy PSOM Event

Good Evening,

Liberty Utilities (CalPeco Electric) LLC ("Liberty") is notifying the California Public Utilities Commission that one Liberty customer will be impacted by an upstream de-energization event caused by NV Energy implementing a Public Safety Outage Management ("PSOM") event in portions of its service territory. NV Energy's PSOM event will result in one Liberty customer (with two connections that are not currently in use) being out of power. This event is not a PSPS. NV Energy's PSOM event is anticipated to start at 10:00 pm this evening and conclude by 3:00 pm tomorrow afternoon. The customer is aware of the NV Energy PSOM event.

**Dan Marsh | Liberty Utilities (California) | Senior Manager, Rates and Regulatory Affairs**  
P: | C: 530-721-2435 | E: [Dan.Marsh@libertyutilities.com](mailto:Dan.Marsh@libertyutilities.com)  
701 National Ave, Tahoe Vista, California 96148

## 17 Appendix D – NV Energy Notification Outline

*Purpose:* To outline a communication and coordination timeline between NVE, RC West Truckee Donner Public Utility (TDPUD), Plumas Sierra Utility, and Liberty during a possible PSOM event that would impact TDPUD and Liberty’s electric distribution grid.

### Impacted lines by Utilities

TDPUD – North Truckee 101 Transmission line, Summit Metering Stations 102 Transmission lines, and Truckee Summit Metering Station 607 Transmission

Liberty - North Truckee 101 Transmission line, Summit Metering Stations 102 Transmission lines, Truckee Summit Metering Station 607 Transmission, Buckeye-Meyers 111, Incline Village PDZ, Stateline PDZ, California 204, Muller 1296, and Topaz 1261, 112 Buckeye to Roundhill, Kingsbury 2800 (Heavenly PDZ)

Plumas Sierra – 619 Transmission Line

RC West – All transmission outages

### Notification Timeline

- 4-6 Days out from event:
  - An email notification with an external stakeholder form from NV Energy will be sent to TDPUD/ Liberty/ Plumas Sierra contacts.
  - RC West will be communicated with through ESCC via established protocols
  
- 2-3 Days out from event:
  - An email notification with an external stakeholder form from NV Energy will be sent to TDPUD/ Liberty/ Plumas Sierra contacts.  
*\*\* Information will be added to the email about additional communication to be held within 48 hours of the event.*
  - TDPUD/ Liberty/ Plumas Sierra representative is invited to NV Energy’s Emergency Response Organization (ERO) calls or called to be told about the incoming weather.  
*\*\* TDPUD/ Liberty will ensure the other is informed and will be available and on the update call*
  
- 0-2 Days out from event:
  - A daily call from an NV Energy POC to TDPUD/ Liberty/ Plumas Sierra contacts to discuss the event and give the below information (as available).
    - Agenda
      - Estimated de-energized time and duration
      - Probability
      - Impacted area or lines

- See above listed possible impacted lines for each utility
- TDPUD/ Liberty/ Plumas Sierra to identify a single POC for NVE to communicate directly with through the remaining steps of the event.

*\*\* Set standard time for daily update calls*

*\*\* CANNOT have call between 1600-1700 due to Liberty restrictions*

- De-energization – at time of actual de-energization
  - NVE will make a phone call directly to TDPUD/ Liberty/ Plumas Sierra POC that has been pre-established
- Weather decreased notification
  - NVE will make a phone call directly to TDPUD/ Liberty/ Plumas Sierra POC that has been pre-established
    - NVE will let TDPUD/ Liberty/ Plumas Sierra know that the weather decreased around the transmission line and NVE is preparing to patrol
- Patrols
  - NVE will make a phone call directly to TDPUD/ Liberty/ Plumas Sierra POC that has been pre-established to let them know NVE has begun patrols of the transmission line
- Ready to re-energize
  - NVE will make a phone call directly to TDPUD/ Liberty/ Plumas Sierra POC that has been pre-established to let them know NVE has finished patrols and are ready to re-energize the transmission line.