BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA

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Application of Liberty Utilities (CalPeco Electric) LLC (U 933-E) for Authority to Recover Costs Related to the 2020 Mountain View Fire Recorded in the Wildfire Expense Memorandum Account	Application 25-06-017

NOTICE OF *EX PARTE* MEETING OF THE PUBLIC ADVOCATES OFFICE

Pursuant to Rule 8.4 of the California Public Utilities Commission's (Commission's) Rules of Practice and Procedure, the Public Advocates Office at the California Public Utilities Commission (Cal Advocates) provides this notice of an *ex parte* meeting with Commissioner Darcie Houck's office.

The meeting occurred via Webex on Tuesday July 14, 2026, at 1 PM PDT and ended at 1:30 PM PDT. Attending on behalf of Commissioner Houck's office was Deputy Chief of Staff Victor Smith. Attending for Cal Advocates was Nathaniel Skinner, Deputy Director for Energy and Administration; Arthur "Iain" Fisher, Program Manager, Safety Branch; Matthew Karle, Program and Project Supervisor, Safety Policy Section; and Travis Foss, Staff Attorney.

During the meeting, Cal Advocates expressed serious concerns with the June 22, 2026, Proposed Decision, which approves imprudent actions. This sends a troubling message to the Commission's regulated utilities that imprudence will be rewarded with ratepayer funding.

Cal Advocates explained that on the day of the Mountain View ignition, Liberty ignored the increasingly severe fire weather conditions on the ground, and that Liberty's complete lack of situational awareness was by definition imprudent. Cal Advocates further explained that rather than utilizing its own ratepayer-funded weather station data, Liberty was blind to the actual weather conditions at the Walker, California ignition site. That blindness led to the utility making wrong decisions, ultimately resulting in the ignition. Liberty ignored reports from its own work crews on site that wind conditions were "unbelievable" and were causing wires to slap together. Liberty relied on a fire weather dashboard riddled with missing and erroneous data.

Liberty did not properly activate its PSPS protocols despite real time conditions meeting its own, CPUC-approved, conditions for activation.

Cal Advocates further explained that Liberty did not meet its Wildfire Mitigation Plan commitments for situational awareness, and did not follow its own PSPS protocol. Despite this, the Proposed Decision deems those policies and programs prudent.

Cal Advocates discussed that Liberty's imprudent operation of its electric assets dates back to the original acquisition of those assets in 2011. Liberty did not demonstrate on the record that it performed any due diligence to assess and document the state of the assets before its purchase. It took Liberty nine years to initiate a comprehensive asset survey, which it performed between April and August of 2020. This was highly irresponsible in light of the known history of wire slap on the circuit, and the circuit being Liberty's worst performing in 2016, 2017, and 2019. Liberty did not ultimately complete reconductoring work to mitigate ignition risk on the Topaz 1261 circuit until 2022.

Cal Advocates explained that the PD commits legal error in finding the utility's overall programs and policies were prudent, but nevertheless disallowing 25% cost recovery based on Liberty's failure to follow those programs and policies, and numerous other failings that the PD finds were within Liberty's control. A disallowance without imprudence findings is contrary to the plain reading of Public Utilities Code section 451.1. Liberty's serious failures to meet its commitments to situational awareness and follow its own PSPS protocols constitute imprudence and a fair weighing of the evidence calls for a larger disallowance.

Respectfully submitted,

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