LOG BEGINS JULY 3, 2025

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Liberty 2026-2028 Base WMP Discovery Log

Log entered Count	YES/NO Daily Note	DR Set #	Data Request	Question No.	Question ID	Questions	Responses	Responder	Date Received	Final Due Date	Date Sent	Links	Number of Attachments	Attachment title	Data Required?	WMP Section	Category	Subcategory
1	OIIS	1	OIIS-P WMP_2025-Liberty-001	1	OIIS-001-001	Q01. Regarding Vegetation Management Inspection Targets: a. What is the total miles of overhead distribution lines and 52.85 circuit miles of transmission line, totaling 1,039.79 combined circuit miles of distribution and transmission overhead lines. In Table 9.2, Liberty provides a three-year total of 900 circuit miles for its "Vegetation Management Inspection Program - Detailed" and reports a cumulative quarterly target for 2026 QR of 700 circuit miles for its "Vegetation Management Program - LiDAR." b. Table 9.2 of its 2026-2028 WMP, for "Vegetation Management Program - Detailed", Liberty lists the "Inspection Type" as "Transmission and Distribution," "Area Inspected" as "Territory," and "Frequency" as "Three-year cycle." In the same table, for "Vegetation Management Program - LiDAR", Liberty lists the "Inspection Type" as "Distribution Only," "Area Inspected" as "Territory," and "Frequency" as "Annual." c. Does the "Three-Year Total" target for "Vegetation Management Program - Detailed" include all overhead circuit miles in Liberty's territory? If yes, explain the different number of circuit miles reported in Table 9.2 and the "Three-Year Total" target for "Vegetation Management Program - Detailed." If no, explain why Liberty does not include all overhead circuit miles in its three-year target for "Vegetation Management Program - Detailed." d. Does the "Cumulative Quarterly Target, 2026 QR" for "Vegetation Management Program - LiDAR" include all overhead circuit miles in Liberty's territory? If yes, explain the different number of circuit miles reported in Table 9.2 and the "Cumulative Quarterly Target, 2026 QR" target for "Vegetation Management Program - LiDAR." If no, explain why Liberty does not include all overhead circuit miles from its annual LiDAR program.	a. The target unit for detailed inspections is miles inspected of overhead primary distribution and transmission voltage classes (12kV-25kV and 60kV-115kV). The target does not include the secondary voltage class distribution lines that are included in Table 9.2 and are inspected by the vegetation management program's LiDAR inspection program. The total miles of overhead primary distribution and transmission system is approximately 700 miles. Liberty intends to complete LiDAR inspections of the total overhead primary distribution and transmission system annually. The target quantities lines along its primary distribution system. These secondary lines inspections are not included in the target. b. The target unit for LiDAR inspections is miles inspected of overhead primary distribution and transmission voltage classes (12kV-25kV and 60kV-115kV). The target does not include the secondary voltage class distribution lines that are included in Table 9.2. The total miles of overhead primary distribution and transmission system is approximately 700 miles. Liberty intends to complete LiDAR inspections of the total overhead primary distribution and transmission system annually.	Jessica McHale	7/1/2025	7/7/2025	7/7/2025	https://liberty-utilities.box.com/s/qwk5c7j3ynf1ln2f2ffxq1ozzzzzzzzz https://liberty-utilities.box.com/s/qwk5c7j3ynf1ln2f2ffxq1ozzzzzzzzz			No	9	Vegetation Management and Inspections	
1	OIIS	1	OIIS-P WMP_2025-Liberty-001	2	OIIS-001-002	Q02. Regarding Vegetation Management Procedures: a. Provide the most recent versions of the following procedures documents: i. Vegetation Management Plan (VM-01); ii. Hazard Tree Management Plan (VM-02); iii. Post Work Verification Procedure (VM-04); iv. Vegetation Management Standards; v. Vegetation Management Specification and Method Revisions Policy (VM-06); vi. Vegetation Management Inspection Manual (VM-07); vii. Pesticide Plan; b. Regarding Liberty's Pole Clearing Target (WMP-VM-VM-01): i. On page 170 of its 2026-2028 WMP, Liberty sets annual targets in 2026, 2027, and 2028 of 4,900 poles. On page 182 of its 2026-2028 WMP, Liberty states "[t]here are approximately 4,900 poles that require clearing on an annual basis in SRA and FRA." Explain why Liberty does not include in its 2026-2028 WMP: a. the required to be cleared under Public Resources Code (PRC) 4292 (i.e., poles in the SRA); b. Are not required to be cleared under PRC 4293 (i.e., poles not in the SRA); c. Are not required to be cleared under PRC 4293 but are required to meet minimum clearances and/or Liberty's standard operating procedures that require those poles to be cleared. ii. On page 170 of its 2026-2028 WMP, Liberty sets annual targets in 2026, 2027, and 2028 of 4,900 poles. On page 204 of its 2026-2028 Base WMP, Liberty set annual targets in 2023, 2024, and 2025 of 4,940 poles. Provide justification and details on planned or completed activities which support that the volume of poles clearing work required during Liberty's 2026-2028 WMP cycle will decrease by 40 poles.	a. Refer to attachments "Liberty Response_DR-001-Q02-1a" and "Liberty Response_DR-001-Q02-1b."	Jessica McHale	7/1/2025	7/7/2025	7/7/2025	https://liberty-utilities.box.com/s/qwk5c7j3ynf1ln2f2ffxq1ozzzzzzzzz https://liberty-utilities.box.com/s/qwk5c7j3ynf1ln2f2ffxq1ozzzzzzzzz	2		No	9	Vegetation Management and Inspections	
1	OIIS	1	OIIS-P WMP_2025-Liberty-001	3	OIIS-001-003	Q03. Regarding Liberty's Wood and Slash Management Target (WMP-VM-VM-02): On page 180 of its 2026-2028 Base WMP, Liberty sets annual wood and slash management targets of 240 acres for each year 2026, 2027, and 2028. On page 181, Liberty states, "Liberty has implemented a fuel Management Program as a proactive, preventative strategy to reduce wildfire risk by removing wood and treating brush and slash after vegetation maintenance is performed. Additional treatments that reduce surface fuels from previous activities and those that further reduce fuel loads are also implemented." a. Provide an outline that describes how Liberty plans to complete vegetation management work to meet its 240 acre annual wood and slash management target. The outline must include: i. Specify the number of acres that Liberty will perform additional fuel management work on and total material that was not generated by Liberty's own vegetation management activities; ii. Specify the diameter classes of woody vegetation to be treated under these activities and describe how each diameter class will be treated. b. The number of acres that Liberty will perform additional fuel management work on and total material that was not generated by Liberty's own vegetation management activities; c. Specify the diameter classes of woody vegetation to be treated under these activities and describe how each diameter class will be treated	a. Wood and slash management is a component of tree removal work and is dependent upon trees identified in the field during ground based inspections requiring mitigation, and landowner preference for wood removal. Liberty calculates wood material based off completed work orders with cleanup methods of 100% removal or cutting wood rounds into firewood lengths. Typically, if work occurs on a residential lot less than 0.25 acres the entire tree is cut. Typically, for larger parcels where wood and slash management is performed, Liberty calculates the area treated based on the length of the right of way for the span. In instances where wood and slash is treated on more than one or a location, Liberty records the acres for that location only once. Liberty has averaged about 2,233 tree removals per year since 2021 with 3.5 in trunking wood management just now work. To determine annual target, Liberty forecasts approximate acres treated based off historical numbers. 1. Diameter classes of woody vegetation treated are as follows: •0-3.5 - 6" DBH •3.5 - 12" = 12" DBH •12 - 24" = 24" DBH •24 - 36" = 36" DBH •36 - 48" = 48" DBH •48 - 60" = 60" DBH •60 - 72" = 72" DBH •72 - 84" = 84" DBH •84 - 96" = 96" DBH •96 - 108" = 108" DBH •108 - 120" = 120" DBH •120 - 132" = 132" DBH •132 - 144" = 144" DBH •144 - 156" = 156" DBH •156 - 168" = 168" DBH •168 - 180" = 180" and greater b. Liberty is unable to forecast the number of acres treated for projects where vegetation material is not generated through its vegetation management activities. However, Liberty actively develops and manages additional fuel management projects through collaborative groups of work and detailed specifications. These projects are implemented in coordination with agency partners and landowners, with storage calculated based on the specific project footprint. Liberty currently does an opportunistic approach to fuel reduction work and coordinates with its customers to support or contribute to fuel reduction efforts that align with its operational priorities. Liberty will also continue to support the U.S. Forest Service's Forest Resiliency Corridors projects located adjacent to Liberty's infrastructure. 1. Diameter classes of woody vegetation treated are as follows: •0-3.5 - 6" DBH •3.5 - 12" = 12" DBH •12 - 24" = 24" DBH •24 - 36" = 36" DBH •36 - 48" = 48" DBH •48 - 60" = 60" DBH •60 - 72" = 72" DBH •72 - 84" = 84" DBH •84 - 96" = 96" DBH •96 - 108" = 108" DBH •108 - 120" = 120" DBH •120 - 132" = 132" DBH •132 - 144" = 144" DBH •144 - 156" = 156" DBH •156 - 168" = 168" DBH •168 - 180" = 180" and greater	Jessica McHale	7/1/2025	7/7/2025	7/7/2025	https://liberty-utilities.box.com/s/qwk5c7j3ynf1ln2f2ffxq1ozzzzzzzzz https://liberty-utilities.box.com/s/qwk5c7j3ynf1ln2f2ffxq1ozzzzzzzzz			No	9	Vegetation Management and Inspections	
1	OIIS	1	OIIS-P WMP_2025-Liberty-001	4	OIIS-001-004	Q04. Regarding Liberty's Wood and Slash Management Target (WMP-VM-VM-02): On page 180 of its 2026-2028 Base WMP, Liberty sets annual wood and slash management targets of 240 acres for each year 2026, 2027, and 2028. On page 181, Liberty states, "Liberty has implemented a fuel Management Program as a proactive, preventative strategy to reduce wildfire risk by removing wood and treating brush and slash after vegetation maintenance is performed. Additional treatments that reduce surface fuels from previous activities and those that further reduce fuel loads are also implemented." a. Provide an outline that describes how Liberty plans to complete vegetation management work to meet its 240 acre annual wood and slash management target. The outline must include: i. Specify the number of acres that Liberty will perform additional fuel management work on and total material that was not generated by Liberty's own vegetation management activities; ii. Specify the diameter classes of woody vegetation to be treated under these activities and describe how each diameter class will be treated.	a. Liberty's 2026 WMP Base Plan states on page 180 that "Liberty has implemented a fuel Management Program as a proactive, preventative strategy to reduce wildfire risk by removing wood and treating brush and slash after vegetation maintenance is performed." Liberty's fuel management program is a collaborative approach to reduce fuel loads in the vicinity of Liberty's infrastructure. Liberty's fuel management program includes work on Liberty's own vegetation management activities, as well as work on other entities' lands. Liberty's fuel management program includes work on the U.S. Forest Service's Forest Resiliency Corridors projects located adjacent to Liberty's infrastructure. Liberty's fuel management program also includes work on other entities' lands that are not related to Liberty's own vegetation management activities. Liberty's fuel management program

5	CPUC - SPD	5	SPD LIB-WMP2021G-001	9	SPD-001-Q09	On page 66 of the 2019-2028 Base WMP, Liberty notes that Section 5.1 includes circuits contributing greater than or equal to 1% of Overall Utility Risk. According to Liberty's Quarterly Data Reports, the TWI7200 circuit is 4-HFTD Tier 2 and represents about 0.67% (~8.8 miles total) of Liberty's grid. SPD calculated that this circuit experienced 14 unplanned outages, representing over 2.5M in CMI in 2014 and the first 3 months of 2015 (13 months total). a.Explain how Liberty determined that TWI7200 satisfies (or satisfies a portion of) or outage program risk.	a.Liberty did not calculate ignition/fire risk or outage program risk. The Utility Risk is less than 1% of the overall utility risk so Liberty did not exhibit the risk for TWI7200.	Kazmierski, Lance	7/21/2023	7/27/2023	7/27/2023	https://California.StarNetOnline.com/uploads-5/Liberty%20Wa...mmary%20Data%20Request%20-%20SPD%20-%20Q09.pdf			No	6	Wildfire Mitigation Strategy Development	
6	CPUC - SPD	6	SPD LIB-WMP2021G-001	10	SPD-001-Q10	On page 69 of the 2019-2028 Base WMP, Liberty indicates that Utility Risk ("UR") is calculated using the formula: PSPS Risk = Pre-Risk(LS) +UR a.Explain why Liberty does not include Fire Risk in the formula. b.Explain why Liberty only includes the PSPS Risk portion of Outage Program Risk when calculating Utility Risk. c.Explain why in the formula of Outage Program Risk Liberty divides the sum of SRP Outage Risk and PSPS Risk by two. d.Explain why Liberty does not factor Fire contribution to the calculation of Utility Risk? e.If so, explain how. f.If not, explain why not. g.Reconcile why Figure 5-1 shows Asset Failure Risks contributing to Utility Risk, but the formula on page 69 does not include Asset Failure Risk.	a.The average is taken to normalize to a common scale from 0 to 1 so that the metrics can be implemented into the total risk without any circuit disproportionately influencing the final score. b.Liberty's Utility Risk is a measure of risk to the utility from PSPS events. c.The average is taken to normalize to a common scale from 0 to 1 so that the metrics can be implemented into the total risk without any circuit disproportionately influencing the final score. d.The Probability of Asset Failures brought into Wildfire Likelihood which falls under the Fire Risk Metrics. e.N/A. f.N/A. g.Figure 5-1 presents a conceptual overview of the Risk Based Decision Making Framework, which includes Asset Failure Risk, Fire Risk, and PSPS Risk. Asset Failure Risk is not included in the utility risk formula, because its effects are already embedded in the wildfire risk and outage program risk. Liberty's Risk Based Decision Making Framework is used to identify and prioritize mitigations that reduce Utility Risk. Figure 5-1 is a broader depiction of how Asset Failure Risk informs decision making. The formula for utility risk more accurately reflects the conceptual model used to generate risk scores.	Kazmierski, Lance	7/21/2023	7/27/2023	7/27/2023	https://California.StarNetOnline.com/uploads-5/Liberty%20Wa...mmary%20Data%20Request%20-%20SPD%20-%20Q10.pdf			No	5	Risk Methodology and Assessment	
6	CPUC - SPD	6	SPD LIB-WMP2021G-001	11	SPD-001-Q11	In response to ACI Q-21b (Q-1330.04), Liberty states that it conducted 3.1 miles of fixed wing drone infrared inspections on its transmission assets. a.Provide a list of assets where these inspections happened, and include the following: i.Circuit Segment ID i.Circuit ID i.Asset ID i.Asset Type i.Longitude i.Lat i.Date i.Reason why Liberty does not plan to conduct additional infrared inspections during the 2019-2028 WMP cycle.	a.Circuit Segment ID (C1:1330.04), (C1:1330.04 & C2:1330.04) b.Circuit ID 6830 & 1077 c.Latitude (C1:38.0954000,-122.0815000,-122.0815000,-122.0815