LOG BEGINS JULY 3, 2025

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Liberty 2026-2028 Base WMP Discovery Log

Log updated 8/11/2025																				
Log Count	Data Name	DR Set #	Date Request	Question No.	Question ID	Question	Response	Responder	Date Received	Final Follow Due	Date Sent	Links	Number of Attachments	Attachment Info	Data Required?	WMP Section	Category	Subcategory
1	OIS	1	OIS-P WMP_2025-Liberty-001	1	OIS-001-001	Q01. Regarding Vegetation Management Inspection Targets: a. On page 61 of Liberty's 2026-2028 WMP, Liberty states that it will circuit index of overhead distribution lines and 52.85 circuit miles of transmission lines, totaling 1,035.70 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? d. 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." e. If no, explain why Liberty does not include all overhead circuit miles in its three-year target for "Vegetation Management Program - Detailed." f. Does the "Cumulative Quarterly Target, 2026 QR" for "Vegetation Management Program - LiDAR" include all overhead circuit miles in Liberty's territory? g. 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." h. Provide the number of circuit miles of overhead circuit miles there are annual LiDAR targets.	a. The target unit for detailed inspections is miles. Inspected of overhead primary distribution and transmission voltage classes (115kV, 230kV, and 500kV-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. Detailed inspections are a third of its overhead primary distribution and transmission system per year. Liberty's detailed inspections are a third of its overhead primary distribution and transmission system per year. Liberty's inspection cycle is based on its primary distribution system. These percentages have inspections, and not included in the target. b. The target unit for LiDAR inspections is miles. Inspected of overhead primary distribution and transmission voltage classes (115kV, 230kV, and 500kV-115kV). The target does not include the secondary voltage class distribution lines that are included in Table 9-2. c. The total miles of overhead primary distribution and transmission circuits 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/qwk5c7j3ynb7ji2ll9ie2ozzhq7ii2ll/files/1922962202962 https://liberty-utilities.box.com/s/qwk5c7j3ynb7ji2ll9ie2ozzhq7ii2ll/files/1922962202962		No		9	Vegetation Management and Inspections	
1	OIS	1	OIS-P WMP_2025-Liberty-002	2	OIS-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 Audits; v. Vegetation Management Notification and Work Restoration Policy (VM-06); vi. Vegetation Management Inspection Manual (VM-07); vii. Pole Clearing Procedure.	a. Refer to attachments "Liberty Response_DR-001-Q02-i-vi" and "Liberty Response_DR-001-Q02-vii."	Jessica McHale	7/1/2025	7/7/2025	7/7/2025	https://liberty-utilities.box.com/s/qwk5c7j3ynb7ji2ll9ie2ozzhq7ii2ll/files/1922962202962 https://liberty-utilities.box.com/s/qwk5c7j3ynb7ji2ll9ie2ozzhq7ii2ll/files/1922962202962	2		No		9	Vegetation Management and Inspections	
1	OIS	1	OIS-P WMP_2025-Liberty-003	3	OIS-001-003	Q03. Regarding Liberty's Pole Clearing Target (WMP-VM-VM-01): a. 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 5Bn and PNC." b. Are all poles that require annual clearing included in the 4,900 pole target? c. Are required to be cleared under Public Resources Code (PRC) 4292 (i.e., poles in the PRC)? d. Are not required to be cleared under PRC 4292 (i.e., poles not in the PRC). e. Are required to be cleared under PRC 4293 (i.e., poles at least as high as the conductors and/or Liberty's standard operating procedures that require those poles to be cleared. f. 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 potential or completed activities which support that the volume of pole clearing work required during Liberty's 2026-2028 WMP cycle will decrease by 40 poles.	a. Of the approximately 4,900 poles targeted for pole clearing, approximately 4,100 are required to be cleared under Public Resources Code (PRC) 4292. b. Of the approximately 4,900 poles targeted for pole clearing, approximately 450 are not required to be cleared under Public Resources Code (PRC) 4292. c. Approximately 350 poles are required to be cleared under PRC 4293 (i.e., poles at least as high as the conductors and/or Liberty's standard operating procedures that require those poles to be cleared. d. Liberty updated its annual pole clearing target to 4,900 to account for fluctuations in poles from ongoing pole replacement work and system upgrades.	Jessica McHale	7/1/2025	7/7/2025	7/7/2025	https://liberty-utilities.box.com/s/qwk5c7j3ynb7ji2ll9ie2ozzhq7ii2ll/files/1922962202962 https://liberty-utilities.box.com/s/qwk5c7j3ynb7ji2ll9ie2ozzhq7ii2ll/files/1922962202962		No		9	Vegetation Management and Inspections	
1	OIS	1	OIS-P WMP_2025-Liberty-004	4	OIS-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 203, Liberty states, "Liberty has implemented a fuel Management Program as a proactive/preventative approach to reduce wildfire risks 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. Specific tasks and activities that are required to complete vegetation management work to meet the wood and slash management target; ii. Specify the diameter classes of woody vegetation to be treated under these activities and describe how each diameter class will be treated; iii. 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; iv. 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 acres treated 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 lot size is counted. For larger parcels where wood and slash remains on the property, 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 counts the acre for that location only once. Liberty has averaged about 1,233 tree removals per year since 2021 with 13.6 inching 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: • • •

5	CPUC - SPD	5	SPD-LIB-WMP2026-001	9	SPD-001-Q09	On page 69 of the 2019-2028 Base WMP, Liberty notes that Table 5-1 includes circuits contributing greater than or equal to 1% of Overall Utility Risk. According to Liberty's Quarterly Data Reports, the TWH1500 circuit is in HFTD Tier 2 and represents about 0.86% of Overall Utility Risk. Provide a complete list of all circuits in HFTD Tier 2 and HFTD Tier 3 that represent at least 0.86% of Overall Utility Risk. Provide the following information for each circuit: a. Circuit name and number; b. Circuit length; c. Number of customers served; d. Circuit voltage; e. Circuit Risk Value; f. Circuit Risk Value as a percentage of Overall Utility Risk; g. Circuit Risk Value as a percentage of HFTD Tier 2 Risk; and h. Circuit Risk Value as a percentage of HFTD Tier 3 Risk.	a. Liberty did not calculate zero wildfire ignition 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 TWH1500.	Kumamoto Larrar	7/11/2023	7/17/2023	7/17/2023	https://California.StarfleetOnline.com/uploads/5.0/wiki/SDG%26E/wiki%2F0%2F0%2F0%2Fq_%2F0%2F0-q09.docx%2F0%2F0%2Fq_%2F0%2F0-q09.docx%2F0%2F0%2Fq_%2F0%2F0-q09.docx