LOG BEGINS JULY 3, 2025

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Liberty 2026-2028 Base WMP Discovery Log

Last updated:	8/25/2025																			
Log Count	Data Name	DR Part #	Date Request	Question No.	Question ID	Questions	Responses	Responder	Date Received	Final Folder Due	Date Sent	Links	Number of Attachments	Attachment title	Data Responsive?	WMP Section	Category	Subcategory
1	OIS	1	OIS-P-WMP_2025-Liberty-001	1	OIS-001-001	Q01. Regarding Vegetation Management Inspection Targets: a. Provide the total number of circuit miles for overhead distribution lines and 52.85 circuit miles of transmission line, totaling 1,039.70 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," "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.	The target unit for detailed inspections is miles inspected of overhead primary distribution and transmission voltage classes (12kV-230kV 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. Liberty's Vegetation Management Program includes a separate dedicated inspection cycle for all of its overhead primary distribution and transmission system per year. Since the inspection cycle for these assets is longer than a year, Liberty's WMP reports separately their annual progress towards completing its primary distribution system. These assets are then included in the target. b. The target unit for LiDAR inspections is miles inspected of overhead primary distribution and transmission voltage classes (12kV-230kV and 60kV-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.sharepoint.com/sites/LibertyOCR/Shared%20Documents/Forms/AllItems.aspx?id=%2FSites%2FLibertyOCR%2FShared%20Documents%2FDiscovery%2FLibertyWMP%2FDR%2DOIS%2D001%2DWMP%2D2025%2DLiberty%2DOIS%2D001%2Dq001.pdf			No	9	Vegetation Management and Inspections	
1	OIS	1	OIS-P-WMP_2025-Liberty-001	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 Standards; v. Vegetation Management Notification and Refusal Resolution Policy (VM-06); vi. Vegetation Management Inspection Manual (VM-07); vii. Pruning Specifications.	a. Refer to attachments "Liberty Response_DR-001-Q02-i" and "Liberty Response_DR-001-Q02-vi."	Jessica McHale	7/1/2025	7/7/2025	7/7/2025	https://liberty.sharepoint.com/sites/LibertyOCR/Shared%20Documents/Forms/AllItems.aspx?id=%2FSites%2FLibertyOCR%2FShared%20Documents%2FDiscovery%2FLibertyWMP%2FDR%2DOIS%2D001%2DWMP%2D2025%2DLiberty%2DOIS%2D001%2Dq002.pdf	2		No	9	Vegetation Management and Inspections	
1	OIS	1	OIS-P-WMP_2025-Liberty-001	3	OIS-001-003	Q03. Regarding Liberty's Pole Clearing Target (WMP-VM-1PM-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 SRA and FRA." Provide the following for the 4,900 poles: a. Are 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 4292 (i.e., poles not in the SRA); c. Are required to be cleared under PRC 4293 (i.e., poles in the Fire Hazard Severity Zone) and/or Liberty's standard operating procedures that require those poles to be cleared. d. 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. 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 of the approximately 4,900 poles targeted for pole clearing are required to be cleared under PRC 4293 and 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.sharepoint.com/sites/LibertyOCR/Shared%20Documents/Forms/AllItems.aspx?id=%2FSites%2FLibertyOCR%2FShared%20Documents%2FDiscovery%2FLibertyWMP%2FDR%2DOIS%2D001%2DWMP%2D2025%2DLiberty%2DOIS%2D001%2Dq003.pdf			No	9	Vegetation Management and Inspections	
1	OIS	1	OIS-P-WMP_2025-Liberty-001	4	OIS-001-004	Q04. Regarding Liberty's Wood and Slash Management Target (WMP-VM-1PM-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 capability 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 activities that will be performed to meet the wood and slash management target, including vegetation management activities; ii. Specific 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	Jessica McHale	7/1/2025	7/7/2025	7/7/2025	https://liberty.sharepoint.com/sites/LibertyOCR/Shared%20Documents/Forms/AllItems.aspx?id=%2FSites%2FLibertyOCR%2FShared%20Documents%2FDiscovery%2FLibertyWMP%2FDR%2DOIS%2D001%2DWMP%2D2025%2DLiberty%2DOIS%2D001%2Dq004.pdf			No	9	Vegetation Management and Inspections	
1	OIS	1	OIS-P-WMP_2025-Liberty-001	5	OIS-001-005	Q05. Regarding Extreme Event Scenarios: a. On page 61 of Liberty's 2026-2028 WMP, Liberty states that it is "assessing the ability of Firelight to account for extreme or high uncertainty scenarios." Provide the timeline, including milestones and associated dates, for when Liberty intends to complete this assessment and integrate six extreme scenarios into its risk modeling. b. Provide the following for each of the six extreme scenarios in Table 5-4 (Liberty Summary of Extreme Event Scenarios. Liberty includes the "Impact of climate change on long-term weather and vegetation conditions that impact fire behavior." Provide the timeline for integrating this scenario into Firelight and the associated dates.	a. Currently, Liberty does not have a timeline of when it intends to complete the assessment and integrate the extreme scenarios into its risk model. The assessment of extreme or high uncertainty scenarios is solely dependent on Technosylva's prioritization of risk modeling efforts and because these types of scenarios are difficult to model, Liberty does not have timeline. b. Currently, Liberty does not plan to evaluate climate change in its risk modeling framework.	Jessica McHale	7/1/2025	7/7/2025	7/7/2025	https://liberty.sharepoint.com/sites/LibertyOCR/Shared%20Documents/Forms/AllItems.aspx?id=%2FSites%2FLibertyOCR%2FShared%20Documents%2FDiscovery%2FLibertyWMP%2FDR%2DOIS%2D001%2DWMP%2D2025%2DLiberty%2DOIS%2D001%2Dq005.pdf			No	5	Risk Methodology and Assessment	
1	OIS	1	OIS-P-WMP_2025-Liberty-001	6	OIS-001-006	Q06. Regarding Risk Models: a. Provide the following for each wildfire risk driver measure and proximity to top risk-contributing circuits, shown in Table 5-6 (Liberty Top Risk Circuits: i. Provide the total number of circuits evaluated within Liberty's service territory; ii. Provide the total number of circuits evaluated within Liberty's service territory.	a. 1/10/2025 b. 5,000	Jessica McHale	7/1/2025	7/7/2025	7/7/2025	https://liberty.sharepoint.com/sites/LibertyOCR/Shared%20Documents/Forms/AllItems.aspx?id=%2FSites%2FLibertyOCR%2FShared%20Documents%2FDiscovery%2FLibertyWMP%2FDR%2DOIS%2D001%2DWMP%2D2025%2DLiberty%2DOIS%2D001%2Dq006.pdf			No	5	Risk Methodology and Assessment	
1	OIS	1	OIS-P-WMP_2025-Liberty-001	7	OIS-001-007	Q07. Regarding Risk Reduction On Top Circuits: a. Refer to Table 9-1 (Summary of Top 10 Circuits - Summary of Risk Reduction for Top Circuits (Liberty's 2026-2028 WMP, pages 103-104) wo Excel with the following additional columns: i. 2026 Grid Hardening Planned Circuit Mileage ii. 2027 Grid Hardening Planned Circuit Mileage iii. 2028 Grid Hardening Planned Circuit Mileage iv. 2026 Covered Conductor Planned Circuit Mileage v. 2027 Covered Conductor Planned Circuit Mileage vi. 2028 Covered Conductor Planned Circuit Mileage b. Identify whether "grid hardening" includes covered conductor for the circuit mileage provided.	a. Refer to attachment "Liberty Response_DR-001-Q07" b. Grid hardening refers to all WMP initiative activity included in Section 8.2 of Liberty's 2026-2028 Base WMP and includes covered conductor. Because grid hardening refers to all WMP initiative activities included in Section 8.2, overall grid hardening is not measured in circuit miles (e.g., overall miles includes the number of line attachment removals, the number of fuse replacements).	Jessica McHale	7/1/2025	7/7/2025	7/7/2025	https://liberty.sharepoint.com/sites/LibertyOCR/Shared%20Documents/Forms/AllItems.aspx?id=%2FSites%2FLibertyOCR%2FShared%20Documents%2FDiscovery%2FLibertyWMP%2FDR%2DOIS%2D001%2DWMP%2D2025%2DLiberty%2DOIS%2D001%2Dq007.pdf	1		No	5	Risk Methodology and Assessment	
2	OIS	2	OIS-P-WMP_2025-Liberty-001	1	OIS-001-001	Regarding Liberty's Compliance Audit Program Objective and Sampling Statistics: a. On page 61 of Liberty's 2026-2028 WMP, Liberty states that it is "preparing for third-party compliance audits, are performed by qualified vendors." However, on page 200 Liberty does not include its qualified vendor Compliance Audit in Table 9-20. Similarly, on page 201 Liberty does not include its qualified vendor Compliance Audit in Table 9-21. a. Complete the table below to describe the program objective for Liberty's qualified vendor Compliance Audit. b. Complete the table below to provide sampling statistics for Liberty's qualified vendor Compliance Audit.	See DR response for tables.	Jessica McHale	7/8/2025	7/8/2025	7/8/2025	https://liberty.sharepoint.com/sites/LibertyOCR/Shared%20Documents/Forms/AllItems.aspx?id=%2FSites%2FLibertyOCR%2FShared%20Documents%2FDiscovery%2FLibertyWMP%2FDR%2DOIS%2D001%2DWMP%2D2025%2DLiberty%2DOIS%2D001%2Dq001.pdf			No	9	Vegetation Management and Inspections	
2	OIS	2	OIS-P-WMP_2025-Liberty-001	2	OIS-001-002	Regarding Liberty's Compliance Audit Pass Rate Calculation: a. On page 204-205 of its 2026-2028 Base WMP, Liberty states "as described in Section 9.11.2, Liberty uses the results of the external Compliance Audit as a metric to provide reasonable assurance that work is being completed as assigned and/or prescribed and complaints with applicable regulations." Liberty states "as described in Section 9.11.2, Liberty uses the results of the external Compliance Audit as a metric to provide reasonable assurance that work is being completed as assigned and/or prescribed and complaints with applicable regulations." a. Provide a list of the criteria that generate the Compliance Audit pass rate (e.g., regulation clearance distance (RCD), ANSI A300 standards, pre-inspection work accuracy, tree-crew work accuracy, etc.). b. If multiple criteria generate the Compliance Audit pass rate, explain how Liberty weights each criterion to calculate the pass rate.	Compliance Audit Criteria: Description Pass/Fail Action each auyer that has been evaluated from the sample crew, the count of trees that have been pruned and/or trees that are expected to encroach into the regulated clearance distances within 3 years. Tree within Regulated Clearance Distance Pass/Fail: Pass if no trees within regulated clearance distances (or for 12kv - 60kv, 10' for 120kv) within the evaluated sample The percentage of tree located within regulated clearance distances during the compliance audit. A measured aggressive distance during the compliance audit. A measured aggressive distance during the compliance audit.	Jessica McHale	7/8/2025	7/8/2025	7/8/2025	https://liberty.sharepoint.com/sites/LibertyOCR/Shared%20Documents/Forms/AllItems.aspx?id=%2FSites%2FLibertyOCR%2FShared%20Documents%2FDiscovery%2FLibertyWMP%2FDR%2DOIS%2D001%2DWMP%2D2025%2DLiberty%2DOIS%2D001%2Dq002.pdf			No	9	Vegetation Management and Inspections	
2	OIS	2	OIS-P-WMP_2025-Liberty-001	3	OIS-001-003	Regarding Design of Vine and Confidence Level for Quality Control of Detailed Inspections: a. On page 51 of its 2026-2028 Base WMP, Liberty states (we include confidence level in margin of error (MOE) for its audit of Detailed Inspections. Provide the following for Liberty's Audit of Detailed Inspections, or provide an explanation why it cannot be provided: i. The confidence level; ii. The MOE; and iii. The sample size.	Due to the small number of units, applying standard statistical parameters (e.g., 95% confidence level, 5% margin of error) results in disproportionately large sample sizes. To maintain efficiency and adequate oversight, a 10% sample size was applied for Detailed Inspections. This percentage aligns with the proportion used for Completed Tree Work.	Jessica McHale	7/8/2025	7/8/2025	7/8/2025	https://liberty.sharepoint.com/sites/LibertyOCR/Shared%20Documents/Forms/AllItems.aspx?id=%2FSites%2FLibertyOCR%2FShared%20Documents%2FDiscovery%2FLibertyWMP%2FDR%2DOIS%2D001%2DWMP%2D2025%2DLiberty%2DOIS%2D001%2Dq003.pdf			No	9	Vegetation Management and Inspections	
2	OIS	2	OIS-P-WMP_2025-Liberty-001	4	OIS-001-004	Regarding Quality Control Pass Rate Calculations: On page 204-205 of its 2026-2028 Base WMP, Liberty lists multiple conditions that it assigns to produce a final quality control pass rate after either a "single tree" or a "inadequate." On page 205 of its 2026-2028 Base WMP, Liberty indicates that the "Inspection Quality Control Pass Rate" is the average of the "Tree Work Quality Control Pass Rate" and "Tree Removal Quality Control Pass Rate." a. Describe how Liberty calculates the quality control pass rate of the "annual circuit relief" tree (i.e., indicate if Liberty uses logic in the average of all individual trees or pass/fail logic). Liberty calculates the target pass rate using another method. b. Describe how Liberty calculates the target pass rate.	The pass rate is calculated as the average of all condition scores for the sample units evaluated within each QC work type. See Section 9.11.4, Table 9-24, 9-25, 9-26, 9-27, and 9-28 of Liberty's 2026-2028 WMP.	Jessica McHale	7/8/2025	7/8/2025	7/8/2025	https://liberty.sharepoint.com/sites/LibertyOCR/Shared%20Documents/Forms/AllItems.aspx?id=%2FSites%2FLibertyOCR%2FShared%20Documents%2FDiscovery%2FLibertyWMP%2FDR%2DOIS%2D001%2DWMP%2D2025%2DLiberty%2DOIS%2D001%2Dq004.pdf			No	9	Vegetation Management and Inspections	
2	OIS	2	OIS-P-WMP_2025-Liberty-001	5	OIS-001-005	Regarding Minimum Educational Requirements: a. On page 137 of its 2026-2028 Base WMP, Liberty states that it requires a "bachelor's degree or equivalent" for Vegetation Management Supervisor, and System Arborist/Forester (e.g., degree in Forestry, Environmental Science, Natural Resources, Biology, etc.)? b. For positions with educational requirements, indicate each position and the level of education Liberty requires. c. For positions without educational requirements, indicate each position and describe why these positions do not have minimum educational requirements.	Generally, Liberty's minimum educational requirement for internal vegetation management positions is a bachelor's degree or equivalent. Relevant work experience may be an exception to the minimum educational requirement for these positions. All other vegetation management roles are staffed through contracted vendors, so these positions are technical in nature.	Jessica McHale	7/8/2025	7/8/2025	7/8/2025	https://liberty.sharepoint.com/sites/LibertyOCR/Shared%20Documents/Forms/AllItems.aspx?id=%2FSites%2FLibertyOCR%2FShared%20Documents%2FDiscovery%2FLibertyWMP%2FDR%2DOIS%2D001%2DWMP%2D2025%2DLiberty%2DOIS%2D001%2Dq005.pdf			No	9	Vegetation Management and Inspections	
2	OIS	2	OIS-P-WMP_2025-Liberty-001	6	OIS-001-006	Regarding Weather Station Optimization: a. Liberty's response to one for continual improvement (J-15-18 "Weather Station Optimization" Liberty indicated it has "engaged Eagle Rock Analytics to perform a weather station optimization analysis for its system to evaluate how well the network captures the diversity of climate conditions within Liberty's territory. b. Regarding Liberty's Eagle Rock Analytics study, Liberty stated that it expected to receive the Weather Station Optimization final analysis from Eagle Rock Analytics by the end of 2024, and that, "Liberty will provide the final analysis in its next WMP submission or in response to stakeholder requests". c. Provide the Weather Station Optimization report from Eagle Rock Analytics.	The results of the analysis performed by Eagle Rock Analytics were provided in the form of GIS data. Please refer to attachments "Liberty Response_DR-001-Q06-i" and "Liberty Response_DR-001-Q06-ii" for the weather station optimization analysis.	Jessica McHale	7/8/2025	7/8/2025	7/8/2025	https://liberty.sharepoint.com/sites/LibertyOCR/Shared%20Documents/Forms/AllItems.aspx?id=%2FSites%2FLibertyOCR%2FShared%20Documents%2FDiscovery%2FLibertyWMP%2FDR%2DOIS%2D001%2DWMP%2D2025%2DLiberty%2DOIS%2D001%2Dq006.pdf	2		No	Appendix D, Section 10	Areas for Continued Improvement, Situational Awareness and Forecasting	
2	OIS	2	OIS-P-WMP_2025-Liberty-001	7	OIS-001-007	Regarding Risk Reduction Values Presented in Table 9-1: a. Some risk reduction values are presented as negative, implying an increase in risk within the service territory. i. Explain if the model was for these values not to include a negative sign ii. Explain why these values are negative. iii. List reduction/mitigation scenarios reported in Table 9-1 where risk is a service territory level and should represent how much impact an activity has that year on its service territories. Are the risk reduction values reported in Table 9-1 calculated at a service territory level or circuit/segment level? b. Liberty's Risk Reduction Plan includes mitigation for certain activities, such as covered conductor installation, appears to remain constant (e.g., 0.2%) over multiple years despite varying annual circuit mile targets. Provide calculations in an Excel file of each calculated risk reduction per year and per activity.	a. The negative values presented in the risk reduction results are outputs from the risk model and reflect statistically non-significant changes in risk. These values do not indicate an actual increase in risk but rather result from the inherent variability in the simulation process. i. The model, developed by Enspace, employs a stochastic simulation methodology. This approach incorporates randomness to account for uncertainty in future outcomes. Each scenario is simulated 100 times, and in each iteration, the probability of a risk event is randomly selected at the segment level. This process generates a distribution of risk values for each treatment scenario. Negative values may occur when the treatment level is insufficient to produce a consistent and measurable reduction in risk across all simulated futures. In such cases, small improvements may be obscured by the variability introduced through random sampling. In these instances, the model interprets the outcome as a statistically insignificant change, rather than a true increase in risk attributable to the mitigation activity. When all initiatives are simulated in combination, the cumulative treatment demonstrates a clear and consistent reduction in risk. However, when initiatives are evaluated individually, their isolated impact on the service territory level may be too small to register as statistically significant within the model's variability. Increasing the number of simulation iterations could reduce this variability, as the average risk value tend to converge with more runs. ii. Refer to attachment "Liberty Response_DR-001-Q07" for the requested list of mitigations. iii. Risk reduction was calculated and reported in Table 9-1 as a three-year average over the 2026-2028 Wildfire Mitigation Plan. b. Please refer to attachment "Liberty Response_DR-001-Q07" for the results of the simulations of each calculated risk reduction per year and per activity. Additional information regarding calculations is provided in Section 2.2: Utility Risk Model of the Phase 1 Implementation of SWMPRM Tools and WMP Support (2021) Final Report.	Jessica McHale	7/8/2025	7/8/2025	7/8/2025	https://liberty.sharepoint.com/sites/LibertyOCR/Shared%20Documents/Forms/AllItems.aspx?id=%2FSites%2FLibertyOCR%2FShared%20Documents%2FDiscovery%2FLibertyWMP%2FDR%2DOIS%2D001%2DWMP%2D2025%2DLiberty%2DOIS%2D001%2Dq007.pdf	1		No	5	Risk Methodology and Assessment	
2	OIS	2	OIS-P-WMP_2025-Liberty-001	8	OIS-001-008	Regarding Traditional Overhead Hardening (WMP-GDOM-GH-01): On page 115 of its 2026-2028 Base WMP, Liberty states, "Traditional overhead hardening typically includes installation of stronger poles, modern conductor, shorter spans, increased phase spacing, reduced sag, and hardware upgrades such as brackets, insulators, and crossarms. These upgrades enhance the resilience of the electric system against environmental stressors." a. Provide a complete description of the scope of work planned for the 5.2 circuit miles of this activity. i. What percentage of these miles will replace existing bare wire conductor? ii. Describe the difference between "bare" and "covered" conductor installed from the existing conductor being replaced. iii. Explain how covered conductor differs from "modern conductor." Includes a description of the insulation Liberty uses for covered conductor. b. Additionally, on page 114 of its 2026-2028 Base WMP, Liberty states that "traditional overhead hardening remains a cost-effective and versatile approach, particularly in areas where forest density or terrain constraints make covered conductor or undergrounding impractical." i. Explain why it is not feasible to replace the existing bare wire conductor with covered conductor in these locations. ii. Lastly, in its response to JCI-11-23-B-06 (Effectiveness of Service Relay Profile ("SRP") and Traditional Hardening), Liberty noted "Normal Replacement Baseline" as a project (Appendix D, Table 1-2: Comparison of Risk Calculations). i. Explain how "Normal Replacement Baseline" is the correct offsetting project to traditional overhead hardening activity.	a. Liberty assumed a 50% reduction in the Probability of Ignition (POI) for covered conductor in its 2026-2028 Wildfire Mitigation Plan based on a combination of factors, including subject matter expertise, joint IOU working groups, and industry research. Additional supporting reference include: • "Ignition Performance of Overhead Conductors" (Electric Power Research Institute, 2021) • "Wildfire Risk Reduction Through Hardening Electric Infrastructure" (Xu et al., 2023) • "Wildfire Risk Reduction Through Hardening Electric Infrastructure" (Xu et al., 2023) b. Refer to attachment "Liberty Response_DR-001-Q08-i." c. Refer to attachment "Liberty Response_DR-001-Q08-ii."	Jessica McHale	7/8/2025	7/11/2025	7/16/2025	https://liberty.sharepoint.com/sites/LibertyOCR/Shared%20Documents/Forms/AllItems.aspx?id=%2FSites%2FLibertyOCR%2FShared%20Documents%2FDiscovery%2FLibertyWMP%2FDR%2DOIS%2D001%2DWMP%2D2025%2DLiberty%2DOIS%2D001%2Dq008.pdf			No	8	Grid Design, Operations, and Maintenance	
2	OIS	2	OIS-P-WMP_2025-Liberty-001	9	OIS-001-009	Regarding Emerging Grid Hardening Technology Installations and Pilot Program: On page 115 of its 2026-2028 Base WMP, Liberty states "Traditional overhead hardening typically includes installation of stronger poles, modern conductor, shorter spans, increased phase spacing, reduced sag, and hardware upgrades such as brackets, insulators, and crossarms. These upgrades enhance the resilience of the electric system against environmental stressors." a. Provide a complete description of the scope of work planned for the 5.2 circuit miles of this activity. i. What percentage of these miles will replace existing bare wire conductor? ii. Describe the difference between "bare" and "covered" conductor installed from the existing conductor being replaced. iii. Explain how covered conductor differs from "modern conductor." Includes a description of the insulation Liberty uses for covered conductor. b. Additionally, on page 114 of its 2026-2028 Base WMP, Liberty states that "traditional overhead hardening remains a cost-effective and versatile approach, particularly in areas where forest density or terrain constraints make covered conductor or undergrounding impractical." i. Explain why it is not feasible to replace the existing bare wire conductor with covered conductor in these locations. c. Lastly, in its response to JCI-11-23-B-06 (Effectiveness of Service Relay Profile ("SRP") and Traditional Hardening), Liberty noted "Normal Replacement Baseline" as a project (Appendix D, Table 1-2: Comparison of Risk Calculations). i. Explain how "Normal Replacement Baseline" is the correct offsetting project to traditional overhead hardening activity.	Currently, Liberty is not piloting or evaluating specific emerging grid hardening technologies. As a smaller utility with limited resources, Liberty leverages research and pilot results from larger IOUs to inform the future adoption of technologies. Liberty actively participates in joint IOU calls and working groups to stay aligned with proven, cost-effective technologies.	Jessica McHale	7/8/2025	7/11/2025	7/16/2025	https://liberty.sharepoint.com/sites/LibertyOCR/Shared%20Documents/Forms/AllItems.aspx?id=%2FSites%2FLibertyOCR%2FShared%20Documents%2FDiscovery%2FLibertyWMP%2FDR%2DOIS%2D001%2DWMP%2D2025%2DLiberty%2DOIS%2D001%2Dq009.pdf			No	8	Grid Design, Operations, and Maintenance	
2	OIS	2	OIS-P-WMP_2025-Liberty-001	10	OIS-001-010	Regarding Traditional Overhead Hardening (WMP-GDOM-GH-01): On page 115 of its 2026-2028 Base WMP, Liberty states "Traditional overhead hardening typically includes installation of stronger poles, modern conductor, shorter spans, increased phase spacing, reduced sag, and hardware upgrades such as brackets, insulators, and crossarms. These upgrades enhance the resilience of the electric system against environmental stressors." a. Provide a complete description of the scope of work planned for the 5.2 circuit miles of this activity. i. What percentage of these miles will replace existing bare wire conductor? ii. Describe the difference between "bare" and "covered" conductor installed from the existing conductor being replaced. iii. Explain how covered conductor differs from "modern conductor." Includes a description of the insulation Liberty uses for covered conductor. b. Additionally, on page 114 of its 2026-2028 Base WMP, Liberty states that "traditional overhead hardening remains a cost-effective and versatile approach, particularly in areas where forest density or terrain constraints make covered conductor or undergrounding impractical." i. Explain why it is not feasible to replace the existing bare wire conductor with covered conductor in these locations. c. Lastly, in its response to JCI-11-23-B-06 (Effectiveness of Service Relay Profile ("SRP") and Traditional Hardening), Liberty noted "Normal Replacement Baseline" as a project (Appendix D, Table 1-2: Comparison of Risk Calculations). i. Explain how "Normal Replacement Baseline" is the correct offsetting project to traditional overhead hardening activity.	a. Liberty assumed a 50% reduction in the Probability of Ignition (POI) for covered conductor in its 2026-2028 Wildfire Mitigation Plan based on a combination of factors, including subject matter expertise, joint IOU working groups, and industry research. Additional supporting reference include: • "Ignition Performance of Overhead Conductors" (Electric Power Research Institute, 2021) • "Wildfire Risk Reduction Through Hardening Electric Infrastructure" (Xu et al., 2023) • "Wildfire Risk Reduction Through Hardening Electric Infrastructure" (Xu et al., 2023) b. Refer to attachment "Liberty Response_DR-001-Q08-i." c. Refer to attachment "Liberty Response_DR-001-Q08-ii."	Jessica McHale	7/8/2025	7/11/2025	7/16/2025	https://liberty.sharepoint.com/sites/LibertyOCR/Shared%20Documents/Forms/AllItems.aspx?id=%2FSites%2FLibertyOCR%2FShared%20Documents%2FDiscovery%2FLibertyWMP%2FDR%2DOIS%2D001%2DWMP%2D2025%2DLiberty%2DOIS%2D001%2Dq010.pdf			No	8	Grid Design, Operations, and Maintenance	
2	OIS	2	OIS-P-WMP_2025-Liberty-001	11	OIS-001-011	Regarding Total Utility Risk: a. Refer to Figure 1-1 of Liberty's 2026-2028 Base WMP and page 7 of the Enspaen report (Attachment 01), there are two figures depicting the components of total utility Risk. i. Explain why Figure 1-1 WMH Framework (Liberty's Base 2026-2028 WMP, page 41) includes an additional "Asset Failure Risk" while the Utility Risk calculation in Section 1.2.2.3 (Liberty's Base 2026-2028 WMP, page 49) does not include that risk. ii. Explain why Figure 1-2: WMH Framework (Liberty's Base 2026-2028 WMP, page 42) and Figure 3: Overview of the Risk Framework for Liberty Utilities in SWRPRM (Attachment 01, Enspaen Report, page 7) seem to be depicting different frameworks for Liberty's risk model. iii. Describe the differences depicted, and why such differences exist. iv. Which figure more accurately depicts Liberty's risk modeling framework?	Refer to attachment "Liberty Response_DR-001-Q11"	Jessica McHale	7/8/2025	7/8/2025	7/8/2025	https://liberty.sharepoint.com/sites/LibertyOCR/Shared%20Documents/Forms/AllItems.aspx?id=%2FSites%2FLibertyOCR%2FShared%20Documents%2FDiscovery%2FLibertyWMP%2FDR%2DOIS%2D001%2DWMP%2D2025%2DLiberty%2DOIS%2D001%2Dq011.pdf			No	5	Risk Methodology and Assessment	
3	OIS	3	OIS-P-WMP_2025-Liberty-001	1	OIS-001-001	Regarding Probability of Ignition: On page 57 of Liberty's 2026-2028 Base WMP, POI is noted as synonymous with "burn likelihood" and "ML," which Energy Safety assumes stands for Wildfire Likelihood. However, on page 62 of Liberty's 2026-2028 Base WMP, the ML row of the table lists the Probability of Ignition is an input. On page 65 of Liberty's 2026-2028 Base WMP, the "Probability of Ignition" (POI) is equated with "ML," which Energy Safety assumes stands for Wildfire Consequence. a. Please explain the difference between POI and ML, as used in Liberty's WMP. a. Liberty's Fire POI calculated by Technosylva is derived from the AFI (probability of at least fifteen acres burned) and weather sampling from Technosylva (mentioned in the Enspaen report, Appendix B, page 11). i. Describe why scaling of the POI (Technosylva from Liberty's 2026-2028 Base WMP, page 44) is based on the 80th percentile of the POI.	a. Probability of Ignition (POI) is derived from Technosylva Firelight. POI represents the likelihood that an ignition occurs, such as a failed asset, will result in a fire requiring suppression. It is a static metric calculated at specific ignition points. Wildfire Likelihood (WL), as Enspaen Risk Asset Tool (ERAT) models that incorporates POI as an input to the WL model. WL also incorporates condition modifiers to produce a refined asset specific score and states of mitigation activity. b. Wildfire Consequence is not derived from Probability of Asset Failure. c. The scaling of POI is based on the 80th percentile of POI to increase the sample size of events that could occur. Liberty made the decision to make the risk model less risk adverse to show POI on a slightly broader spectrum to magnify risk. This decision was made for reasons due to the small pool of data relating to utility caused ignitions in Liberty's service territory.	Jessica McHale	7/8/2025	7/11/2025	7/16/2025	https://liberty.sharepoint.com/sites/LibertyOCR/Shared%20Documents/Forms/AllItems.aspx?id=%2FSites%2FLibertyOCR%2FShared%20Documents%2FDiscovery%2FLibertyWMP%2FDR%2DOIS%2D001%2DWMP%2D2025%2DLiberty%2DOIS%2D001%2Dq001.pdf			No	5	Risk Methodology and Assessment	
3	OIS	3	OIS-P-WMP_2025-Liberty-001	2	OIS-001-002	Regarding Wildfire Consequence: a. On page 57 of Liberty's 2026-2028 Base WMP, the Enspaen Report (Attachment 01), there are two figures depicting the components of total Utility Risk. i. Explain why Figure 1-1: WMH Framework (Liberty's Base 2026-2028 WMP, page 41) includes an additional "Asset Failure Risk" while the Utility Risk calculation in Section 1.2.2.3 (Liberty's Base 2026-2028 WMP, page 49) does not include that risk. ii. Explain why Figure 1-2: WMH Framework (Liberty's Base 2026-2028 WMP, page 42) and Figure 3: Overview of the Risk Framework for Liberty Utilities in SWRPRM (Attachment 01, Enspaen Report, page 7) seem to be depicting different frameworks for Liberty's risk model. iii. Describe the differences depicted, and why such differences exist. iv. Which figure more accurately depicts Liberty's risk modeling framework?	a. 100% of circuits will have EPI implemented by the end of 2025. b. Liberty's Wildfire Risk Model (WRM) does not include "Asset Failure" calculation, though it is not stated explicitly as "WF risk." Instead, it is represented as WFI (Enhanced Powerline Safety Settings) availability within the PSPS Likelihood module of the EnterprisePRM Risk Assessment Tool (ERAT). In the model, WF is treated as a conditional circuit-level characteristic and is integrated into Utility Risk through its influence on PSPS Likelihood. c. WF is already included in Liberty's risk modeling.	Jessica McHale	7/8/2025	7/11/2025	7/16/2025	https://liberty.sharepoint.com/

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