

**LIBERTY UTILITIES (CALPECO ELECTRIC) LLC'S APPLICATION FOR  
CONFIDENTIAL DESIGNATION OF PURSUANT TO CALIFORNIA CODE OF  
REGULATIONS, SECTION 29200**

I, Jordan Parrillo, declare as follows:

1. I am the Manager of Regulatory Affairs for Liberty Utilities (CalPeco Electric) LLC ("Liberty"). As such, I am responsible for overseeing and reviewing Liberty's confidential materials in connection with Liberty's 2027 Base WMP and related supporting materials submitted to the Office of Energy Infrastructure Safety ("OEIS"). I am authorized to request confidential treatment via this application on behalf of Liberty.

2. I am making this declaration pursuant to California Code of Regulations Title 14, Division 17, Chapter 1, Article 3, § 29200 and in accordance with the confidentiality bases set forth and applicable California Public Utilities Commission's precedent that govern the submission of confidential documents.

3. The data covered by these confidentiality bases as described in the following paragraphs is not in the public domain or publicly known.

4. The redacted information includes detailed descriptions of Liberty's wildfire-risk modeling framework, including proprietary methodologies used to estimate likelihood, consequence, ignition probability, risk rankings, mitigation effectiveness, and prioritization of wildfire-mitigation investments.

5. The redacted material is non-public modeling assumptions, statistical approaches, machine-learning methodologies, analytical methodologies, outage-probability calculations, risk-scaling factors, benefit-cost methodologies, mitigation-effectiveness factors, and validation processes.

6. Listed below are the data for which Liberty is seeking confidential protection and the basis for the confidentiality request.

| <b>Location of Confidential Data (Document and Page)</b>                                                                                                    | <b>Description of Information that is Confidential</b>                                                                                                  | <b>Basis for Confidentiality</b>                                                                                                   |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------|
| Risk Methodology, prepared for Liberty by Filsinger Energy Partners, Appendix B-1, pages 35, 37-38, 39, 40, 44, 46-47, 50, 54-55, 56-58, 60-65, 69, 73, 87. | The identified pages contain sensitive, internal proprietary information and trade secrets developed by and for Liberty that is not publicly available. | Gov't Code §§ 7927.300, 7925.000, 7927.705, 7924.510(f), 7927.605, 7922.000, 7930.205; Civ. Code § 3426 et seq.; Evid. Code § 1060 |

7. The data covered by these confidentiality bases contains confidential intellectual property and trade secret information associated with proprietary processes developed exclusively by Filsinger Energy Partners for Liberty.

8. The information is not publicly available and cannot be readily duplicated without substantial effort, expense, and access to utility-specific operational data.

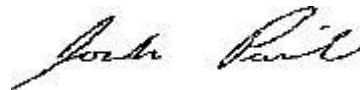
9. The methodologies and associated analytical approaches reflect substantial investment of resources and provide Liberty with proprietary tools used to evaluate, prioritize, and manage wildfire risk throughout its electrical system.

10. Public disclosure would provide third parties access to intellectual property and analytical methodologies that Liberty has developed or acquired at considerable cost. These harms outweigh any incremental public benefit that would result from public disclosure of the specific redacted information because sufficient information remains available in the publicly disclosed versions of Liberty's filings to allow OEIS to understand the nature and purpose of Liberty's wildfire risk-management program.

11. The data should be kept confidential indefinitely.

I certify under penalty of perjury that the information contained in this application for confidential designation is true, correct, and complete to the best of my knowledge.

Executed on August 31, 2026, North Lake Tahoe, California.



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**Jordan Parrillo**  
Manager, Regulatory Affairs  
Liberty Utilities (CalPeco Electric)  
LLC