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DATA REQUEST RESPONSE
LIBERTY UTILITIES (LIBERTY)

Data Request No.: OEIS-P-WMP_2026-Liberty-008
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Subject: Risk Values and Unknown Outage Causes

Q01. Regarding Risk Values:

In Liberty's 2027 Base WMP, for Table 5-5 (p. 94), LU Table 5-6 (p. 95), and Table 6-1 (p. 113), Liberty provides only whole numbers for the percentage of risk and overhead miles values.

- a. Are these values limited based on rounding or use of significant figures?
 - i. If so, explain Liberty's procedures and assumptions that impact its rounding or use of significant figures in reporting its risk values.

Response:

- a. Liberty uses significant figures when presenting outputs from the risk model so as not to convey false precision. Given the many model layers and inputs that come together to produce a quantitative estimate of risk, and given the underlying uncertainty associated with model inputs (e.g., measured wind gust), Liberty does not believe it is appropriate to cite quantitative estimates to multiple decimal points. Doing so implies the level of risk can be precisely known, when a range or confidence interval may be more appropriate to report. Nevertheless, Liberty's Excel-based submission of the WMP tables contains an additional decimal place for risk percentage and overhead miles, and additional decimal places can be readily calculated by dividing by Liberty's reported total estimate of overall utility risk.

Q02. Regarding Unknown Outage Causes:

In response to OEIS Data Request 5 Question 1, Liberty states that 79 outages out of the 3,473 within the outage dataset were excluded due to being "unknown" causes. In Table 3-1 on page 23 of its 2027 Base WMP, Liberty includes 10.53% of ignitions in the HFTD with an "Unknown" risk and risk driver, and 5.26% of ignitions within the HFTD with an "Unknown" risk driver under contact from object.

- a. Provide the number of unknown ignitions used to calculate the percentages in Table 3-1.
- b. On page 21 of its 2027 Base WMP, Liberty states that the prioritization of risk drivers is also based on "outage data from January 2022 through December 2025" in order to "supplement the dataset for prioritizing ignition risk." How has this impacted the percentage of unknown values?
- c. Provide the number of unknown ignitions from January 2022 to December 2025.
- d. Given that the outage data set is from January 2022 to December 2025, while the ignition reporting data is from 2014 to 2025, has Liberty seen a decrease in the number of unknown ignitions since 2014?
- e. How has Liberty worked to decrease the number of unknown ignitions across its service territory?

Response:

- a. Two ignitions for the unknown risk driver and one ignition for the contact from object-related unknown risk driver.
- b. The outage data does not impact the percentage calculations. The % of ignitions in HFTD column is calculated from ignition data. When ignition data is not present for the particular risk driver (i.e., % of ignitions in HFTD equals 0%) outage data is used to inform the relative ranking of that risk driver.

It is also worth mentioning that the unknown outage causes that were dropped in reference to OEIS Data Request 5 Question 1 refer to Liberty's use of the outage dataset for training the probability of outage model. For identifying top risk drivers in Table 3-1, Liberty primarily relied on reported ignitions, and then reviewed the full set of outage records when ignition data was not available for the particular risk driver.

- c. Zero unknown ignitions are recorded between January 2022 to December 2025.
- d. Liberty has seen a decrease in unknown ignition causes from 2014 to 2025. As discussed in (b), the outage dataset does not affect the percentage of ignitions in the HFTD.
- e. Liberty has improved the unknown ignition rate by hiring for the Fire Prevention Specialist role in 2020. As part of the role, Liberty's Fire Prevention Specialist reports to the scene of wildland fires in the service territory and any potential ignitions related to Liberty's assets. In addition, Liberty created a dedicated ignition tracking application within its Fulcrum software and database. This allows Liberty employees across operations, wildfire prevention, and GIS to edit and maintain ignition-related records. As part of Liberty's Risk Assessment Improvement Plan, Liberty is drafting documentation for its Fire Ignition Investigation Procedure, which includes steps for how Liberty identifies and assesses potential ignition events, as well as following regulatory reporting requirements.